

BLAAUWBERG

DISTRICT PLAN

Integrated district spatial development framework
and environmental management framework

APPROVED - Vol. 4: Annexures



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**CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD**

TABLE OF CONTENTS

Technical Annexure 1: Consolidated Terms, Acronyms and Definitions	4
Technical Annexure 2: Scope of the District SDF Review.....	22
Technical Annexure 3: Legal Policy and Context.....	39
Technical Annexure 4: Environmental Management	44
Technical Annexure 5: Ground Water Protection-Potentially Contaminating Activities	62
Technical Annexure 6: Methodology and Definitions for Human Settlements.....	66
Technical Annexure 7: Methodology for Transport Route Designations	77
Technical Annexure 8: Methodology Towards Designation Of Nodal Hierarchy And Typologies.....	84
Technical Annexure 9: Background and Methodology for Spatial Transformation Delineation	102
Technical Annexure 10: Defining Criteria for the Identification of the DFAs, USFAs and EFAs.....	112
Technical Annexure 11: Land Use Model 2040 Key Assumptions	130
Technical Annexure 12: Implementation Mechanisms Draft Baseline Report.....	136
Technical Annexure 13: Generic Environmental Management Programme for Development Projects within the Atlantis Urban Area (hyperlink)	270
Technical Annexure 14: Public Comments and Responses	271

LIST OF FIGURES

Figure 1: IDP pillars and transformation priorities	40
Figure 2: 2012 versus 2017 long-term spatial vision	41
Figure 3: The Basic Accessibility Grid	77
Figure 4: The comprehensive City Accessibility	78
Figure 5: Cape Town's Accessibility Grid (as per CTMSDF, 2018)	79
Figure 6: Facilities nodal description and hierarchy	90
Figure 7: Spatial anatomy of the Blue Turtle	103
Figure 8: Spatial Transformation Areas (extract from CTMSDF, 2018)	106
Figure 9: Types of Property Development	137
Figure 10: Key Tasks	138
Figure 11: Application Process.....	155
Figure 12 Application Process.....	163
Figure 13: Application Process.....	170
Figure 14: Criteria for PT1 and PT2 areas.....	175
Figure 15: Additional criteria for PT1 and PT2 areas.....	175

Figure 16: PT Zones.....	177
Figure 17: Existing and Proposed UDZ Areas within the City of Cape Town.....	179
Figure 18 Depiction of a typical development application process.....	191
Figure 19 Three step consultative process for applications.....	191
Figure 20 Guidelines for assessing land use applications.....	194
Figure 21 Application Process.....	199
Figure 22 Overview of the relationship between the City, SRA and the member.....	205
Figure 23: Overview of the CLDP Methodology.....	209
Figure 24: Methodology.....	218
Figure 25: MURP Areas	218
Figure 26 Applying an Overlay Zone	223
Figure 27: Land Readjustment Scheme (Worldbank, 2015)	252
Figure 28: TAPs.....	254
Figure 29: Urban Redevelopment Scheme (Worldbank, 2015)	256
Figure 30: Land Identification Protocol Process Diagram.....	259
Figure 31: CoCT land pipeline for public investment	260

LIST OF TABLES

Table 1: Listed Activities triggered outside Urban Areas but not inside Urban Areas: i.e. the activities below are excluded inside NEMA Urban Areas.....	51
Table 2: Listed Activities that are different inside and outside Urban Areas.....	56
Table 3: List of Potentially Contaminating Activities	62
Table 4: Criteria to be used to guide the identification of land for subsidised and gap housing.....	74
Table 5: Criteria for categorisation of informal settlements upgrade/support.....	76
Table 6: Transport designations and symbology.....	82
Table 7: Alignment and hierarchy of the accessibility grid and areas of intensification	86
Table 8: Transit (Rail and IRT trunk) station precinct typology	87
Table 9: Community services and health precincts per area.....	88
Table 10: Community services within nodal hierarchy	91
Table 11: Scale/ Hierarchy of Nodes	94
Table 12: Existing Typologies of Nodes/ Precinct Areas	95
Table 13: Typology and characteristics of Nodes.....	98
Table 14: Role and function, characteristics of nodes.....	100
Table 15: Scoring Matrix.....	146
Table 16: Available Mechanisms and Policy Reference	150
Table 17 Proposed Mechanisms and Expected Timeframes	221
Table 18 Local Application Framework.....	266

TECHNICAL ANNEXURE 1: CONSOLIDATED TERMS, ACRONYMS AND DEFINITIONS

The following list of acronyms and definitions is not specific to this document but applicable to the entire suite of SDF documents.

Acronyms and Terms

ACRONYMS	TERM
ACSA	Airport Company South Africa
AOLS	Airport obstacle limitation surfaces
BEPP	Built Environment Performance Plan
BNG	Breaking New Ground (housing developed in terms of the Integrated Residential Development Programme)
BPO	Business Process Outsourcing
BRT	Bus Rapid Transit
CBD	Central Business District
CDC	Community Day Centre
CDF	Conservation Development Framework
CDS	City Development Strategy
CEF	Capital expenditure framework
CFRPAWHS	Cape Floral Region Protected Areas World Heritage Site
CID	City Improvement District
CIF	Capital investment framework
CLDP	Catalytic Land Development Programme
CMA	Cape Metropolitan Area
CoCT	City of Cape Town
COVID-19	Corona virus disease 2019
CPUT	Cape Peninsula University of Technology
CRU	Community Residential Units
CSHIP	Community Services and Health Infrastructure Plan
CSIR	Council for Scientific and Industrial Research
CTIA	Cape Town International Airport
CTICC	Cape Town International Convention Centre
CTMSDF	Cape Town Municipal Spatial Development Framework
CTOD	Comprehensive Transport Orientated Development
dba	Noise level measured in decibel
DEADP	Department of Environment Affairs and Development Planning
DGA	Discouraged Growth Areas as per the MSDF
DMS	Development Management Scheme
DOT	Department of Transport (National)
Du/HA	Dwelling units per hectare (density measure)
DWS	Department of Water and Sanitation
ECAMP	Economic Areas Management Programme
ECD	Early Childhood Development
EIA	Environmental Impact Assessment
EIMZ	Environmental Impact Management Zone
EIP	Environmental Implementation Plan
EMF	Environmental Management Framework
EMP	Environmental Management Plan (in terms of Section 11 of NEMA)

FLISP	Finance Linked Individual Subsidy Programme
GABS	Golden Arrow Bus Service
GIS	Geographic Information System
HIA	Heritage Impact Assessment
HSS	Human Settlements Strategy
ICT	Information communication technology
ICMA	Integrate dCoastal Management Act
IDA	Incremental Development Areas
IDP	Integrated Development Plan (in terms of the MSA)
IDZ	Industrial development zone
IEM	Integrated Environmental Management
IGA/ IGCA	Incremental Growth and Consolidation Areas as per the MSDf
IHSF	Integrated Human Settlement Framework
IKNEP	Integrated Koeberg Nuclear Emergency Plan
IPDF	Infrastructure Planning and Delivery Framework
IPPs	Independent Power Producers
IPTN	Integrated Public Transport Network
IRDP	Integrated Residential Development Programme
IRT	Integrated Rapid transit
IT	Information Technology
ITP	Integrated Transport Plan
IUDF	Integrated Urban Development Framework
KNPS	Koeberg Nuclear Power Station
LAP	Land Assembly Programme
LFTEA	Less Formal Townships Act 113 of 1991
LGTA	Local Government Transition Act
LUM(2040)	Land Use Model (2040)
LUMS	Land use management system
LUPA	Land Use Planning Act(No. 3 of 2014)
LUPO	Land Use Planning Ordinance (1985)
MBT	Mini Bus Taxis
MPA	Marine Protected Areas
MPBL 2015	Municipal Planning By Law, 2015 (City of Cape Town)
MPT	Municipal Planning Tribunal
MSA	Municipal Systems Act (No 32 of 2000)
MSDF	Municipal Spatial Development Framework
MTIF	Medium Term Infrastructure Framework
MTREF	Medium Term Revenue and Expenditure Framework
MURP	Mayoral Urban Renewal Programme
NDP	National Development Plan
NEMA	National Environmental Management Act (No 107 of 1998)
NEMBA	National Environmental Management: Biodiversity Act, Act 10 of 2004
NGO	Non-Governmental Organisation
NHRA	National Heritage Resources Act (No 25 of 1999)
NLTA	National Land Transport Act (No 5 of 2009)
NNR	National Nuclear Regulator
NPA	National Ports Authority
NSDF	National Spatial Development Framework
PAZ	Precautionary Action Zone
PGDS	Provincial Growth and Development Strategy
PGWC / WCG	Provincial Government Western Cape

PHA	Philippi Horticultural Area
PHSHDA	Priority Human Settlements Housing Development Area
PIIF	Public Infrastructure Investment Framework
PNE	Protected Natural Environment
POA	Philippi Opportunity Area
POS	Public open space
PPM	Project portfolio management
PRASA	Passenger Rail Agency of South Africa
PSDF	Provincial Spatial Development Framework
PT	Public Transport
PTP	Public Transport Plan
RAG	Road Access Guideline
SAHRA	South African Heritage Resources Agency
SANDF	South African National Defence Force
SANParks	South Africa National Park
SANRAL	South African National Roads Agency Ltd
SANS	South African National Standard
SCBD	Secondary Central Business District
SDF	Spatial Development Framework
SDG	Sustainable Development Goals
SDS	Social Development Strategy
SEVI 2020	Socio Economic Vulnerability Index
SEZ	Special Economic Zone
SMF	Strategic Management Framework
SMME	Small, medium and micro enterprises
SOE	State Owned Entity
SPC	Spatial Planning Category
SPLUMA	Spatial Planning and Land Use management Act (Act No. 16 of 2013)
SRA	Special Rating Area
SSEG	Small-Scale Embedded Generation
STA	Spatial Transformation Areas
TAP(S)	Transit Accessible Precincts
TIA	Transport Impact Assessment
TMNP	Table Mountain National Park
TPC	Town-planning compliant
TRA	Temporary Relocation Area
TRUP	Two Rivers Urban Park
UCI	Urban Catalytic Investment
UCT	University of Cape Town
UDE	Urban Development Edge
UDP	Urban Development Policy
UIC	Urban Inner Core as per the MSDF
UISP	Upgrade of Informal Settlement Programme
ULO	Draft Unlawful Land Occupation Framework
UPDLI	Undeveloped and Partially Developed Land Inventory
US	University of Stellenbosch
UWC	University of the Western Cape
VPADD	Voluntary proactive deal driven
VPUU	Violence Prevention through Urban Upgrade
WiFi	Wireless Fidelity
WSUD	Water-sensitive urban design
WWTW	Waste water treatment works

Please see list of terms and definitions for acronyms not found on the list above

Terms and definitions

TERM	DEFINITION
Active interface	Refers to street frontages where there is an active visual engagement between those in the street and those on the ground floors of buildings. This quality is assisted where the front facade of buildings, including the main entrance, faces and opens towards the street, and also where ground floor uses accommodate activities that provide a level of interaction between pedestrians and the building uses including cafes/restaurants, shops, offices etc.
Adaptation	In the context of climate change, in human systems, the process of adjustment to actual or expected climate and its effects, in order to moderate harm or exploit beneficial opportunities; in natural systems it means the process of adjustment to actual climate and its effects; human intervention may facilitate adjustment to expected climate and its effects.
Affordable housing	Traditionally, affordable housing refers to housing with prices or values below the overall open market value, and which targets below-average incomes. This is a function of context and, in well-located areas of the City; unit prices are significantly higher than elsewhere, thus increasing the affordability threshold. The Provincial Inclusionary Housing Policy Framework points out that the affordability gap – the mismatch between what most households can afford versus the price most properties are available for - may differ across towns. Affordable housing should be primarily targeted at households earning between R3,500 a month and the upper threshold of the Financial Sector Code Affordable Housing Standards, currently R27 200 in 2023 (in 2018, these were households typically earning R22,000 or more). The 2021 Financial Sector Code Affordable Housing Standards define the affordable housing target market as households earning an upper income limit of R26,100 (rounded) (BASA, 2021). Any housing provision that complies with the definition of the Financial Services Sector, annually updated by using the midpoint between the Consumer Price Index and Building Cost Index, is considered as Affordable Housing in terms of the MSDF. With contributions from the State – in subsidies, land, or other development incentives – the National Department of Human Settlements' upper threshold of R22,000 can be applied and a deeper reach into the lower income bands of the affordable housing market can be achieved.
Alternative energy	energy sourced from a supply other than from a direct connection to a municipal or ESKOM electricity distribution network, including, but not limited to, (a) electricity from portable or rooftop or ground-mounted photovoltaic system, (b) liquid-petroleum gas (LPG), (c) solar water heaters.
Aquifer	Area identified as reflecting the physical extent of a water-bearing layer of soil, sand, gravel or rock that will yield significant usable quantities of water. A ground-level protection zone is required to prevent pollutants from leaching into the water supply
Aquifer Protection Zone (Or Groundwater Protection Zone)	City of Cape Town commissioned Umvoto to conduct a Groundwater Protection Zones and Vulnerability Mapping study in 2020 which identified aquifer resource protection zones based on extraction points where water is least likely to be contaminated and which provide time to clean up or address any potential contamination. These zones form part of much larger Strategic Water Source Areas (SWSAs), both surface and groundwater, delineated by the Water Research Commission in 2017. Surface SWSAs are areas of land that supply a disproportionate quantity of mean annual surface water runoff in relation to their size. Groundwater SWSAs are areas with high groundwater availability as well as where groundwater forms a nationally important resource. The Aquifer Resource Protection Zones are shown on MSDF map 5c to highlight where land uses must be controlled into the future rather than the SWSAs as there is no way to limit land uses and protect the entire SWSA extent.
Areas of Agricultural significance	Areas of high potential and unique agricultural land worthy of long-term protection given unique production, cultural and heritage attributes. This includes land that is currently cultivated, has been cultivated within the past 10 years, has the soil potential to be cultivated or be regarded as high-value grazing land, and contributes to food security, irrespective of extent. This can include non-arable land that supports the ecological support system.
Areas of Coincidence	Areas of coincidence are where there are compelling urban efficiency, social and economic reasons to pursue development and where core biodiversity may be impacted as a result.

Backyard dwelling	Backyard dwellings refer to informal structures on formal, residential erven, regardless of ownership. These structures are used for habitation and may be positioned behind, in front or next to the primary dwelling.
Biodiversity	Biological wealth of a specified geographic region including the different marine, aquatic and terrestrial ecosystems, communities of organisms within these, and their component species, number and genetic variation.
Biodiversity Network (BIONET)	The map of protected and critical biodiversity areas (including natural vegetation remnants and wetlands) for the city, based on the fine-scale systematic conservation plan, in accordance with the legal requirements. The network of the City's biodiversity areas (prioritised using a scientific and systematic fine-scale conservation planning method, in accordance with the legal requirements). Includes Protected Areas, open water courses, wetlands and indigenous vegetation.
Bioregion	A geographic region or area containing whole or nested ecosystems and that is characterised by its landforms, vegetation cover, human culture and history and declared by the Minister in terms of the National Environmental Management: Biodiversity Act, Act 10 of 2004 (NEMBA).
Bioregional plan	A legislated biodiversity plan, aimed at assisting with the management and conservation of South Africa's biological diversity, declared in terms of Chapter 3 of NEMBA. The aim of the plan is to provide a map of biodiversity priorities with accompanying land use decision making guidelines.
Biosphere Reserve	An area of regional biodiversity significance that's part of a global network organised by UNESCO. Core biodiversity areas are surrounded by buffer zones where local communities are permitted sustainable use of the natural resources.
Brownfield Intensification	Enhancing the productivity or profitability of a brownfield site (vacant and underutilised) areas generally located within the urban foot print/ built-up area. May include intensification and densification of the site. Intensification may include redevelopment that means the process of rehabilitating a particular piece of land for new uses after the former use has been discontinued.
Bulk Engineering Services	Means an engineering service provided to multiple users in the municipal area and includes the land required for the construction of bulk engineering services. Bulk services include mega distribution lines of bulk water or sewer and tapers down via link infrastructure to reticulation networks (which serve the individual erven).
Business Node	A business node is a concentration of economic activity which meets the two technical thresholds applied by the City's ECAMP Diagnostic Model: contiguous non-residential property with 1 000 work places and valued at no less than R50 million.
Carbon Neutral	Limiting the carbon emissions produced city wide to a point of neutrality from energy use, transport, and waste than can be absorbed or offset. The City of Cape Town has committed to being carbon neutral by 2050, meaning that it will not emit more carbon from energy use, transport, and waste than can be absorbed or offset.
Carbon sequestration	The process by which carbon sinks remove carbon dioxide (CO ₂) from the atmosphere.
Carbon sink	Anything that absorbs more carbon from the atmosphere than it releases, including plants, the ocean and soil.
Cemetery	A place for the burial of human remains, and may include ancillary buildings such as an office and chapel, but does not include a crematorium.
Character (of a place)	Collection of qualities and features that are distinctive to a place or area and in this case is used to distinguish period of establishment or pattern of settlement
Circular Economy	An industrial system that is restorative or regenerative by intention and design. It replaces the end-of-life concept with restoration, shifts towards the use of renewable energy, eliminates

	the use of toxic chemicals, which impair reuse and return to the biosphere, and aims for the elimination of waste through the superior design of materials, products, systems, and business models. (World Economic Forum definition)
City	means the City of Cape Town, a municipality established by the City of Cape Town Establishment Notice No. 479 of 22 September 2000, issued in terms of the Local Government: Municipal Structures Act, 1998, or any structure or employee of the City acting in terms of delegated authority;
Civic Clusters	Concentration of public facilities (e.g. schools, clinics, libraries) located in close proximity to one another. Various scales depending on the role and function within the locational context.
Civic Precinct	Concentration of public facilities (e.g. schools, clinics, hospitals, parks, city hall, courthouses, post offices, etc.) located in close proximity.
Climate change	Climate change refers to any change in climate over time, whether due to natural variability or as a result of human activity (IPCC 4th Assessment).
Climate Change Adaptation	The process of adjustment to actual, or expected, climate change and its effects. In human systems, adaptation seeks to moderate or avoid harm or exploit beneficial opportunities. In some natural systems, human intervention may facilitate adjustment to expected climate and its effects (IPCC Glossary, 5th Report).
Climate Change Mitigation	The process of adjustment to actual or expected climate and its effects. In human systems, adaptation seeks to moderate or avoid harm or exploit beneficial opportunities. In some natural systems, human intervention may facilitate adjustment to expected climate and its effects (IPCC Glossary, 5th Report). A human intervention to reduce emissions or enhance the sinks of greenhouse gases in the context of climate change.
Coastal Defence	Any natural or artificial structure that is designed or maintained with the view to providing protection for coastal infrastructure against coastal processes, such as coastal erosion, high seas, wind-blown sand etc.
Coastal Edge	Demarcated area around the coast, primarily to protect coastal resources, and to avoid hazards and financial risks pertaining to areas at risk from coastal processes. The coastal edge also represents the coastal management line as contemplated in section 25 of the Integrated Coastal Management Act, (Act No. 36 of 2014).
Coastal Node	Concentrated development at a specific coastal location.
Coastal Processes	Means environmental processes that affect or impact on the shoreline including erosion and accretion, storm surges, sea-level rise, dune and estuary mouth migration and the Aeolian movement of sand.
Coastal inundation areas on Climate Change Map	Coastal inundation areas reflect temporary areas of impact resulting from simultaneous occurrence of an extreme tide and extreme storm, an event with a nominal return period of 500 years. <i>Source: Fairhurst, L. 2008. Global climate change and adaptation: a sea-level rise risk assessment. Phase two: Final Report – Risk and Impact Identification.</i>
Commercial	General business activity and mixed-use development of a medium to high intensity. Whilst the focus of development of these areas is mostly office and retail development; a mix of uses including high and medium density residential development could be appropriate in these areas. Industrial development is generally not suitable in these areas.
Community Facilities	Public spaces and other required facilities where members of a community gather for recreational, educational, social, health and cultural activities. It includes parks and recreational areas, sports fields, community halls, libraries, clinics and public squares. It also includes functions rendered by provincial and national departments such as magistrates' courts, police stations, social services offices, home affairs and labour affairs offices.
Community Park	An intermediate size park, that serves the needs of the 1 or 2 local communities or suburbs. May include passive and active recreation areas, small scale kick-about areas, multi-purpose hard courts and playground equipment.
Connective infrastructure	Network infrastructure and services which enhance the accessibility and growth potential of nodes, including public transport, broadband and bulk infrastructure.

Connector route	These connect different areas of the city and have a greater mobility function than development corridor main roads. They are typically characterised by comparatively high volumes of faster-moving traffic, although this may vary considerably across a variety of different road types in different areas. These may accommodate a mixed activity/ mobility function, but their role in accommodating activity is generally confined only to nodal areas (or in more outlying areas 'villages'). In some instances, direct access to abutting land uses and residential properties is provided along connector routes.
Constrained land	Land in which development potential is constrained by locational and/or regulatory factors, including cemeteries, infrastructure, high potential agricultural land, flood plains, noise contours, parks, biodiversity areas, freeway and railway buffers, servitudes, bulk dams, nature reserves, water bodies and inaccessible pockets. It does not consider ownership or development rights which, in turn, relate to availability rather than Developability.
Context	The broader environment within which a development or site is located. Context is a broad term and can refer to natural systems, topography, the social and economic environment, the built environment, access, public institutions, public space, and public utility services.
Critical Biodiversity Area(CBA)	Critical Biodiversity Areas are terrestrial and aquatic features in the landscape that are critical for conserving biodiversity and maintaining ecosystem functioning, and that are required to meet biodiversity targets (for biodiversity patterns and ecological process features).
Critical Ecological Support Area (CESA)	Natural and rural areas with biodiversity importance which are essential for management consolidation, connectivity and viability of biodiversity in CBAs and protected areas. These are not essential for meeting biodiversity targets but play an important role in supporting the ecological functioning of CBAs and/or in delivering ecosystem services.
Critical Natural Asset (CNA).	Protected and Conservation Areas, irreplaceable Core 1 Critical Biodiversity Areas found outside of designated New Development Areas, Philippi Horticultural Area, land seaward of the Coastal Edge, and mountainous areas performing an agriculturally-significant, Biodiversity or catchment function.
Cultural landscape	Sites, areas, places, settlements and urban and rural landscapes of historical significance, vistas and scenic beauty and places of spiritual, cultural and historic significance.
Decarbonisation	Meaning the process by which countries, individuals or other entities aim to achieve zero fossil carbon existence. Typically refers to a reduction of the carbon emissions associated with electricity, industry and transport.
Densification	Increased use of space, both horizontally and vertically, within existing residential areas/properties and new developments, accompanied by an increased number of units and/or population threshold.
Destination place	A place that forms a significant landmark or area of attraction and is part of the unique identity of Cape Town. Due to these qualities, these places hold potential for exploiting economic opportunities particularly in relation to their role as destinations for locals and tourists.
Development Charges (DCs)	A development charge is a once-off capital charge paid by developers to the City of Cape Town to cover the cost of municipal services. The City has a Development Charges Policy. The desired outcome of Development Charges Policy is to: a) recover the portion of the capital cost of economic infrastructure that is attributable to particular developments; b) enable the provision of economic infrastructure in a timely and sufficient manner to support land development; and c) provide economic infrastructure in the most cost effective manner taking into consideration scarce resources and effective urban form.
Developable Land	Developable land is land falling inside the urban edge of 2016 which was neither developed nor constrained.
Development Corridor	Typified by intensified and diversified land use, these corridors reflect the targeted, prioritised areas earmarked for the largest spectrum of land use mix associated with the highest density of population and employment. They are inclusive of Integration Zones and link diverse economic nodes - ranging from mature and developing to emerging, and across a hierarchy of function and services levels (metropolitan and sub-metropolitan).

Development Focus Areas (DFA)	Areas targeted for urban restructuring and planning focus in the short - medium term that have the highest potential spatial transformative impact with dedicated budget, planning or investment to facilitate development. See Priority Local Facilitation Areas (PLFA).
Development Management Scheme (DMS)	A scheme consisting of scheme regulations and a register with (or without) a zoning map.
Development Route	Characterised by strip and/or nodal urban development along most sections of the route. This comprises (should/can comprise) medium to high intensity mixed use development in identified urban nodes, with primarily (or almost exclusively) medium to high residential development between these node areas. These roads are characterised by direct access and interrupted movement flows, especially at bus and taxi stops and traffic lights.
Diversification of land use	Refers to a mixture of land uses in an area. Refer to Technical Supplement B.
District Node	An area characterised by the intensity (density), mix (diversity) and clustering of urban activities and land use found within them. Nodes often contain central access points to municipal or other services (sub-council offices, and other services points) and centrally located community facilities (courts, hospitals/ clinics, libraries, community halls, sports arenas).
District Plan	Document which includes the integrated District Spatial Development Framework and the Environmental Management Framework
District / Regional Park	A large park with a variety of recreational facilities. Serves the needs of several surrounding communities/ or suburbs in a regional context. People may travel some distance to access. Generally multi-functional. Can include active and passive recreational facilities, informal sports facilities such as kick-about areas, multipurpose hard surfaces and playground equipment. Can include a special interest component such as a river, waterbody and wetland or biodiversity area.
District spatial development framework (DSDF)	As contemplated in Chapter 3, Part 3 of the City of Cape Town Municipal Planning By- Law, 2015, as amended. Document which includes integrated District Spatial Development Framework (DSDF) and Environmental Management Framework (EMF)
Ecological services	Services that indirectly accrue from the natural environment, and do not have direct market values. Can include flood attenuation, natural drainage and erosion prevention, wastewater management through biological treatment, air quality management and filtration, carbon sequestration, and biodegradable waste disposal.
Ecological buffer	Strip of land adjacent to a watercourse, wetland or vlei, required for the protection and enhancement of aquatic and riparian ecosystem integrity and functioning.
Economic agglomeration	A concentration of businesses and people increases productivity both by putting upward pressure on the price of land, thus driving businesses to become more productive and people to become more skilled, and also through the agglomeration benefits to which close proximity of firms gives rise. Valuable agglomeration economies, which help to sustain Cape Town's prominent regional position, are crucially dependent on effective infrastructure.
Economic potential areas	Areas anchored by 'opportunity' or 'growth' business nodes which exhibit an above-average location potential, and typically characterised by economic agglomeration.
Ecosystem	Means a dynamic complex of animal, plant and micro-organism communities and their non-living environment interacting as a functional unit.
Ecosystem services	Ecosystem services are the many and varied benefits to people derived from the natural environment and from healthy ecosystems. They include provisioning (e.g. water supply), regulating (e.g. flood control), supporting (e.g. habitat provision) and cultural (e.g. recreation) services. Refers to the benefits people derive from ecosystems. They include provisioning, regulating, supporting, and cultural services.

	1. Provisioning services are the benefits to people that can be extracted from nature, e.g. food and water. 2. Regulating services are the benefits provided by ecosystem processes that moderate natural phenomena, e.g. water purification, erosion and flood control, and climate regulation. 3. Supporting services are those services that support processes to enable basic sustenance of life, e.g. the provision of habitat, water cycling, nutrient cycling, photosynthesis, and soil formation. 4. Cultural services are the non-material benefits from nature that contribute to the development and cultural enhancement of people, knowledge building, creativity and recreation.
Employed	Persons who work for pay; profit or family gain in the reference period.
Environmental Focus Areas (EFAs)	Spatially targeted areas with critical environmental significance (in terms of national conservation targets) outside of formally protected areas which have been identified as priority areas for investment and/or protection in the short to medium term. See Priority Local Facilitation Areas (PLFA).
External Engineering service	Means municipal engineering services situated outside the boundaries of a land parcel/area required to serve the use and development of the land parcel and is either a bulk engineering service or link engineering service.
Fire Risk Lines	Two sources were combined to delineate Fire Risk Lines: the 'Wildland-Urban Interface' (WUI) - as per the GEF Fynbos Fire Project and defined as the risk level to communities where urban development areas intermingle with flammable wildlands. It represents itself in different risk levels to residents and their assets in terms of exposure to death or injury and damage from wildland fires. The line represents the life risk to residents and was methodologically delineated in a similar fashion from Gordon's Bay to Melkbosstrand on the outer edges of the built-up area. The line should be considered as indicative of locations where vegetation fires are difficult and operationally complex and expensive to fight considering the locational context of the natural environment and operational constraints of practical firefighting. The WUI was supplemented on the Peninsula by the fire breaks of the Table Mountain National Park whilst no line exists for the Cape Flats coastal area.
Floodline	A line on a map depicting water levels likely to be reached by a flood having a specified recurrence interval.
Floor factor (FF)	The factor (expressed as a proportion of 1) which is prescribed for the calculation of maximum floor space of a building or buildings permissible on a land unit. If the floor factor is known, the maximum permissible floor space can be calculated by multiplying the floor factor by the area of the land unit.
Food security	Food security is a situation that exists when all people, at all times, have physical, social and economic access to sufficient, safe and nutritious food that meets their dietary needs and food preferences for an active and healthy life. (HLPE, 2020: 10)[1].
Food Security Assets	Any space, resource or process, which contributes to achieving food security.
Food Security Threat	Food Security Threat Any space, resource or process, which threatens the achievement of food security.
Food Sensitive Planning	Food sensitive planning emerged from water sensitive design and involves an active strategy whereby food security and food system impacts are considered in all planning processes. Food sensitive planning includes specific food and planning related activities.(e.g. zoning for agricultural activities, inclusion of supportive infrastructure for food preparation and storage in trading spaces). It also includes a consideration of food in other planning activities. (e.g. precinct planning, solid waste management). Food sensitive planning spans physical planning, spatial planning, urban design and governance planning.
Form	The layout (structure and urban grain), density, scale (height and massing), appearance (materials and details) and landscape of development.

Functional Area (for the purpose of the CITP)	The Functional Area for the purpose of the Comprehensive Integrated Transport Plan (CITP) is the area of the City, together with the areas of those other municipalities with whom the City has a transport planning relationship. This area has been agreed in the Western Cape Growth and Development Strategy and the Western Cape Land Transport Framework, and is defined in the CITP.
Functional Area (for the purpose of the GCMRSIF)	Functional area to be defined in terms of the Greater Cape Metropolitan Regional Spatial Implementation Framework
Gap housing	Housing for households with a monthly income of between R3 500 and R10 000, who fall outside the government housing subsidy income limit of R3 500 per month, and find it difficult to access housing in the private market.
Gateways	A place or settlement through which tourists typically first visit on their way to a <u>tourist attraction</u> or <u>tourism region</u> . Tourist gateways may not offer significant attractions themselves. Although the term suggests that they must be passed through en route, a gateway may not be the only way to reach the tourist destination
Green Economy	Expanded economic opportunities created through the provision of goods and services, and the use of production processes, that are more resources efficient, enhance environmental resilience, optimise the use of natural assets, and promote social inclusivity.
Green Infrastructure Corridors	Green corridors connect fragments of green space with the aims of enabling species dispersal and limiting animal and plant population isolation; assisting with climate change adaptation; flood prevention; urban ventilation and supporting healthier public environments. Corridors connect fragments of natural and green space within the urban environment and provide a range of services that provide benefits and opportunities for people and nature. These include enabling species dispersal, limiting biodiversity isolation due to habitat fragmentation, assisting with climate change adaptation, improving livability, and providing for social and recreational connection and mobility.
Green infrastructure (GI)	Natural and semi-natural open spaces, natural ecological and 'engineered' ecological systems, with other environmental features, that integrate with the built environment, to provide a wide range of ecological, community and infrastructure services. GI provides ecosystem services and can be present on a continuum from large scale naturally functioning systems to small scale urban elements (e.g. trees or a bioswale within a development). GI can help assist with the amelioration of urban development impacts. GI assets ideally form an interconnected network within the urban environment.
Green Infrastructure Programme (GIP)	A City programme whose purpose is the protection and enhancement of existing natural assets and the promotion of new green infrastructure (GI) assets, in order to underpin Cape Town's sustainability, enhance the city's living environment and improve its resilience to the effects of climate change
Green Infrastructure Network (GINet)	Spatial representation of natural and green open spaces (>1ha) in the city, the benefits they provide and the opportunities they present, in terms of selected predefined ecosystem services. They form a network through the connection via existing and potential ecological and green corridors/ greenways. The intention of the GINet is to guide development
Gross Base Density	The average number of dwelling units per hectare across large city district areas or the city as a whole, excluding land-extensive uses such as agricultural and rural land and large natural areas/nature reserves/parks.
Gross Lettable Area (GLA)	The area of a building as per the MPBL, 2015 designed for, or capable of, occupancy and/or control by tenants, measured from the centre line of joint partitions to the inside finished surface of the outside walls, and shall exclude the following: (a) all exclusions from the definition of floor space; (b) toilets;

	(c) lift shafts, service ducts, vertical penetrations of floors; (d) lift motor rooms and rooms for other mechanical equipment required for the proper functioning of the building; (e) areas reasonably used in connection with the cleaning, maintenance and care of the building, excluding dwelling units for caretakers, supervisors, cleaners or maintenance staff; and (f) Interior parking and loading bays.
Growth Node	A business node which exhibits above-average market performance and above-average location potential as measured by the City's ECAMP Diagnostic Model.
Heritage Conservation Area	Area identified for protection based on its cultural, historical and environmental value and which may, or may not yet, have been formally protected under the NHRA (S31) or under the Heritage Protection Overlay zoning (MPBL).
Heritage Exemption Area	A defined geographical areas where the requirements for heritage permissions have been exempted in terms S34 or S38 of the NHRA and have been published in the government gazette.
Heritage Protection Overlay Zone (HPOZ)	The area identified for the protection of its heritage qualities managed under the Heritage Protection Overlay Zoning of the DMS MPBL. It has been formally protected by means of a gazette notice.
Heritage Inventory	Compiled by the local authority (in this case The City) and contains all heritage resources within its area of jurisdiction.
Heritage Register	A register maintained by the provincial heritage resources authority (in this case HWC) that lists all heritage resources considered to be conservation worthy.
Heritage Resource	Any place or object of cultural significance, according to the NHRA, unique, non-renewable and precious locations includes sites and landscapes of historical significance, areas of scenic beauty, and places of spiritual or cultural importance.
Historic Urban Landscape	An urban landscape that has been formed over time and that is characterized by historical layering of architectural features and cultural values.
Household	A household is a group of persons who live together and provide themselves jointly with food or other essentials for living, or a single person who lives alone. Note that a household is not necessarily the same as a family.
Inclusionary Housing	Policy directive or approach that seeks to leverage the development application process for new residential or commercial developments to secure the construction and perpetual availability of affordable housing in an integrated manner. (See also Affordable Housing)
Incremental densification	Small-scale densification that has a minimal impact on the urban fabric, e.g. subdivision or secondary dwelling units, but translates into higher densities over time.
Institutional open space	These are green open spaces within existing institutional areas, that may not be zoned public open space but provide open space services, these include sportsfields and other open space at schools, sports clubs, hospital sites or university campuses etc.
Internal Engineering Services	All engineering services network points related to the internal distribution network inside a land parcel. Link services connect this internal network to the bulk network.
Inward Growth	Urban development that occurs within the existing urban footprint and infill development of developable land within the current urban periphery.
IRT Feeder Route	A secondary and usually smaller carrying route of an Integrated Rapid Transit system, which feeds the main trunk route.
IRT Trunk Route	A primary carrying route of an Integrated Rapid Transit system with a higher than average large travel demand

Labour absorption rate	Employed persons as a percentage of the working age population.
Labour force	Employed persons plus unemployed persons.
Labour force participation rate	Labour force as a percentage of the working age population.
Land consumption	The rate of conversion from developable to developed land, premised on definition of each.
Land Development	'Land development' means the erection of a building or structure on land or the change in use of land, including township establishment, the rezoning, the subdivision or consolidation of land or any deviation from the land use or use permitted in terms of the development management scheme, and 'development of 'land' and 'develop land' have corresponding meanings.
Land redistribution	Means land redistributed to the landless poor, labour tenants, farm workers, and emerging farmers for residential and productive uses to increase livelihoods and improve quality of life.
Land reform	Encompasses three interrelated components, namely land restitution, land tenure and land redistribution.
Land Unit	Refers to any portion of the Parent Property, or a Section as defined in the Sectional Titles Act, 1986 (Act No. 95 of 1986), situated on the Parent Property, registered or capable of being registered in the Cape Town deeds registry, and includes but is not limited to an "erf" (howsoever zoned) or "sectional title unit"
Land use Intensification	Refers to achieving a greater degree of uses (commercial, industrial and residential) through the increased use of space, both horizontally and vertically, within existing areas or properties and new developments, accompanied by an increased number of units and/or population thresholds, in accessible, high opportunity locations.
Location potential	Composite metric generated annually by the City's ECAMP Diagnostic Model to gauge the level of alignment between a business node's locational assets and constraints, and the generic requirements of the main non-residential property classes -- industrial, office and retail. It consists of agglomeration (scale, intensity and complexity of economic activity), room for growth, proximity to suppliers, markets and gateways, level of infrastructure constraint and congestion, incidence of business burglaries and robberies and access to workers and disposable income.
Marginalised Areas	Areas characterised by predominantly low-income communities including significant informal settlements and/or other neighbourhoods classified as needy or very needy by the City's Socio-Economic Index.
Market Failure	In economics, market failure is a situation in which the allocation of goods and services is not efficient. Externalities result from market failure. A market (e.g. land market) is said to have significant externalities when the true gains and losses associated with the consumption of a product (e.g. land) differs from the private cost. Externalised costs result in inefficient market outcomes. Most mainstream economists believe that there are circumstances in which it is possible for government to improve inefficient market outcomes. Poorly implemented attempts to correct market failure may lead to an inefficient allocation of resources, called government failure.
Market performance	Composite metric generated annually by the City's ECAMP Diagnostic Model to gauge the business node's level of economic performance, using a range of property market indicators including rentals, vacancy, building development and property churn.
Metropolitan Node	An area characterised by the intensity (density), mix (diversity) and clustering of urban activities and land use found within them. Nodes often contain central access points to municipal or other services (sub-council offices, and other services points) and centrally located community facilities (courts, hospitals/ clinics, libraries, community halls, sports arenas).

Mitigation (Climate Change)	Means, in the context of climate change, a human intervention to reduce emissions or enhance the sinks of greenhouse gases.
Marine Protected Area/ No Take Zones	An area of coastline or ocean that is specially protected for the benefit of people and nature; No-Take Zones are where no fishing or extractive activities are allowed.
Mixed land use	Area of existing or proposed horizontal or vertical integration of suitable and compatible residential and non-residential land uses within the same area or on the same parcel of land; implies contextually appropriate intensity of land uses amongst others. Also referred to as land use diversity.
Mobility	The ease with which people can travel with minimal delay on a route.
Multifunctional	The combination of different yet compatible functions within one physical framework to serve a variety of social and community groups; allow for a wider range of facilities that reinforce one another in close proximity, offering greater access to potential users. Differentiation in activity may be physical (different activities on different floors or premises of the same building) or in time (using the same facility for different activities, but at different times).
Municipal financial sustainability	The financial ability to deliver services, develop and maintain the infrastructure required by its residents without unplanned increases in rates and taxes or a reduction in the level of services and the capacity to absorb financial shocks caused by natural, economic and other adversities without external financial assistance.
Neighbourhood Park	A small-scale park serving the needs of the immediate local neighbourhood. May include passive and active recreation areas, small-scale kick-about areas and playground equipment and may be no more than a couple of items of play equipment.
Net Zero Carbon Building	A building that is highly energy-efficient and the remaining energy demand is met by renewable energy, on-site or off-site, so that there are zero net carbon emissions associated with the operational energy of a building on an ongoing annual basis.
New Development Area (NDA).	An area earmarked for future development. undeveloped and partially developed land parcels that are suited for future residential or non-residential urban development, which were identified through a technical investigative process for the City's 2040 Land Use Model in order to determine the required supply and quantum of residential and non-residential development to accommodate the projected future growth of population in Cape Town.
Nodal Development	Significant and concentrated development in terms of scale, location, impact, diversity and agglomeration of functions (facilities, services and economic activities).
Non-motorised transport (NMT)	Transport modes that are not motorised, e.g. walking and cycling.
Not economically active	Persons who were neither employed or unemployed (e.g. full-time students; retired persons; and homemakers who did not want to work).
Noxious industry	A trade, use or activity that is offensive, poisonous or potentially harmful because of fumes, emissions, smell, vibration, noise, waste products, nature of material used, processes employed, or other cause and is considered to be a potential source of danger, nuisance or offence to the general public or persons in the surrounding area
Opportunity Node	A business node, which exhibits above-average location potential but below-average market performance as measured by the City's ECAMP Diagnostic Model.
Other Ecological Support Area (OESA)	Transformed (e.g. extensive agriculture) sites with conservation importance.

Overlay zone	As per MPBL, 2015, Item 159 to 191, a category of zoning applicable to a particular area or land unit which: (i) stipulates development rules in addition to the underlying zone or base zone requirements, which may be more or less restrictive; (ii) may include provisions and development rules relating to primary -, additional -or consent uses, limitations in addition to the underlying base zone, subdivision and sub divisional areas, special planning areas, development incentives, urban form, urban renewal, heritage and environmental protection, etc.
Package-of-plans	As per the MPBL, 2015, The hierarchy of plans specified in terms of the provisions in item 136 of the Development Management Scheme, and applies to areas generally referred to as special planning areas.
Period	Refers to a period of time (date) when a place or area was established or developed
Population density	The number of people per given area, e.g. square kilometre.
Population growth	This is a change in the size of the population (increase or decrease) of a particular place at defined time as a function of births, deaths and net migration.
Potable water	Water intended to be used for drinking or domestic purposes, such as preparing food, and washing.
Precautionary Areas	Means areas that should be discouraged from urban developments, as indicated in Table 8.
Priority Local Facilitation Area (PLFA)	Spatially targeted areas identified in the DSDFs that provide the district / local level basis for spatial prioritisation and aim to guide implementation through directing public investment, incentives, budgets and planning focus for the short to medium term. These include the Development Focus Areas (DFAs), Urban Support Focus Areas (USFAs) as well as Environmental Focus Areas (EFAs).
Proposed Heritage Overlay Zone (PHOZ)	Specific landscape qualities or clusters of heritage resources motivate for protect places of environmental or cultural interest. The inclusion of these in spatial plans is compliant with the NHRA definition of Heritage areas where in Section 31. (1) A planning authority must at the time of revision of a town or regional planning scheme, or the compilation or revision of a spatial plan, or at the initiative of the provincial heritage resources authority where in the opinion of the provincial heritage resources authority the need exists, investigate the need for the designation of heritage areas to protect any place of environmental or cultural interest.
Public space open	Land which is designated as public open space, under the ownership of the City or other organ of state, with or without access control, and which is set aside for the public as an open space for recreation or outdoor sport, including a park, playground, public or urban square, picnic area, public garden, nature area including ancillary buildings, infrastructure and uses.
Public transport interchange (PTI)	Supports the transfer of public transport users between modes (rail/bus/taxi) but also functions to support economic activity.
Resilience	The capacity of social, economic and environmental systems to cope with a hazardous event or trend or disturbance, responding or reorganising in ways that maintain their essential function, identity and structure while also maintaining the capacity for adaptation, learning and transformation.
Resource efficiency	The rate at which finite and scarce resources are consumed relative to economic and population growth.
Resorts	A place that is frequented for holidays or recreation or for a particular purpose.
Risk activity	An undertaking where the material handled or the process carried out is liable to cause combustion with extreme rapidity, give rise to poisonous fumes, or cause explosions, and includes major hazardous installations and activities involving dangerous and hazardous substances that are controlled in terms of national legislation.

Roofscape	The distinguishing character of a particular street or area as viewed along the skyline or horizon and is formed by roof shape and repetitive patterning.
Rural living estates	Extensive land units (ranging in size) located inside the urban edge.
Rivers & streams	Refers to watercourses of all sizes that flow in a natural channel regularly or intermittently as well as its bed and banks.
Scenic Routes	Scenic routes are public roads that traverse areas of outstanding scenic quality or that provide a view of scenic areas. Scenic routes facilitate appreciation of Cape Town's natural, built and cultural heritage, and in themselves have become attractions. Two types of scenic routes exist – SR1 routes, which are limited access routes that traverse areas of high scenic quality and SR2 routes which traverse areas of high scenic quality and are frequently accessed.
Scenic Drive	Scenic Drives frequently link major tourist destinations such as Table Mountain, Cape Point, Kirstenbosch, the Winelands, and the beaches around the Peninsula, and enhance experience of these destinations.
Sea-level rise	An increase in the mean level of the ocean. Eustatic sea-level rise is a change in global average sea level brought about by an increase in the volume of the world's oceans. Relative sea-level rise occurs where there is a local increase in the level of the ocean relative to the land, which might be due to ocean rise or land level subsidence. In areas subject to rapid land-level uplift, relative sea level can fall (IPCC 4th assessment).
Setting	The surroundings in which a heritage resource is situated and which influences the experience of the resource. It can include e.g. backdrop (natural or man-made) or the immediate landscape in which it is situated.
Significant negative impact	In relation to development, when a proposal has the potential to: negatively impact on the structure of a neighbourhood or part of the city; detrimentally alter the character of a neighbourhood; cause undue inconvenience for public access; limit adjacent property owners ability to enjoy or realise the rights they are entitled to; or undermine the market value of an adjacent properties of a neighbourhood as a whole.
Smallholding	Refers to a property, whether improved or not by the construction of a dwelling, not large enough to support a commercially viable farming operation, but able to provide a subsistence level of output for the owner thereof.
Spatial concept	A concept used to describe a particular set of spatial features (e.g. urban node, civic precinct).
Spatial efficiency	The private and public benefit of urban development and attendant infrastructure, relative to its lifecycle cost.
Spatial Targeting	Is the deliberate act of focusing government and private sector interventions, services, infrastructure development or policy responses into a specific geographical area. This area-based approach generally seeks to maximise the impact of an urban or regional policy initiative, and can be applied at a range of scales
Spatial transformation	The process of reversing the negative impacts of apartheid spatial planning (spatial fragmentation, inefficient urban form, racial segregation and ghettos of poverty etc.). Integrating communities and increasing opportunities to a greater number of people in highly connected areas are among the key outcomes of spatial transformation. Renouncing the creation of new low-income communities on the periphery of the city is also a key principle to avoid the need for these groups to spend a disproportionate amount of household income on transport and remain distant and dislocated from the socio-economic benefits and amenities associated with central urban locations.
Special/ Destination Place	A landmark or a location that forms a significant point or area of attraction which contributes to the unique identity of Cape Town
Storm surge	An abnormal rise of water generated by a storm, over and above the predicted astronomical tides (http://www.nhc.noaa.gov/surge/).

Streetscape	The distinguishing character of a particular street as created by the elements at ground floor, including building frontages, setbacks, materials, form, road space, landscaping, street furniture, etc.
Strip development	Mixed-use development usually located along activity routes and activity streets and some developmental routes.
Structuring element	Spatial aspect that provides structure or form to urban development (e.g. a main road provides structure to which land uses respond).
Structuring open space	Open space which is not part of the biodiversity network or significant agricultural areas, but has been identified to promote access to open space for active and passive recreation. Whilst the focus is on areas that are usable and accessible for most of the year, the identification has included cemeteries, detention ponds, servitudes, river corridors and road reserves in order to promote the notion of a linked open space system.
Sub place	Second (lowest) level of the place name category, determined by Statistics South Africa, namely a suburb, section or zone of an (apartheid) township, smallholdings, village, ward or informal settlement.
Subsidised housing	Housing supplied in terms of the National Department of Housing's housing subsidy scheme.
Tenure blind design	A design practice that purposely masks the differences in income and tenure through the use of similar design and architecture throughout the development. This facilitates the development of integrated communities.
Tourism Development Areas	Refers to Tourism Areas which were Identified in the 2004 Tourism Development Framework and it indicated where tourism activities took place (Nodal Hierarchy).
Townscape	The distinguishing character of an urban area or urban landscape, usually relating to a neighbourhood or defined geographical area.
Transit Corridors	Transportation corridors include one or more routes that connect centers of economic activity. The routes have different alignments but common transfer points and common ends, which are gateways that allow traffic to enter or exit the corridor.
Transit Oriented Development (TOD)	Transit-oriented development (TOD) is a multifaceted and targeted strategic land development approach to improved urban efficiencies and sustainability by integrating and aligning land development and public transport services provision. It promotes inward growth and compact city form with an emphasis on building optimum relationships between urban form, development type, development intensity, development mix and public transport services to create a virtuous cycle of benefits over the long term as described in the City of Cape Town TOD Strategic Framework. Different TOD objectives, tools and outcomes are applicable at metropolitan, corridor, nodal, precinct and project scales.
Unemployed	Persons who do not work, but who looked for work and were available to work in the reference period.
Unemployment Rate	Unemployed persons as a percentage of the labour force.
Urban Development	Buildings and infrastructure with a residential purpose as well as offices, shops, community facilities and other associated buildings, infrastructure and public open space necessary to provide for the proper functioning of urban areas and amenity and recreation. The term 'urban development' includes golf estates, vineyard estates with a residential component, equestrian estates with a residential component, rural living estates, eco-estates, gated communities and regional shopping centres. Urban development excludes noxious industry and generally excludes land for industrial purposes. However, service trades that are compatible with mixed-use development and that generate a low impact on surrounding urban uses may be permissible if the nature and type of industry is deemed to form an integral part of an area demarcated for urban development purposes.

Urban Development Edge (UDE)	A demarcated edge line defining the outer limits of urban development for a determined period of time; there are two types of edge lines, namely urban development edge lines and coastal edge lines, - the former being a medium- to long-term edge line, where the line has been demarcated in a position to phase urban growth appropriately, or to protect natural resources. The latter being the coastal management line as contemplated in section 25 of the National Environmental Management: Integrated Coastal Management Act, 2008(Act No. 24 of 2008).
Urban Development Zone (UDZ)	The Urban Development Zone is an area demarcated in accordance with the Income Tax Act, Act 58 of 1962 as amended by the Revenues Laws Amendment Act, Act 45 of 2003. In terms of this incentive, taxpayers who construct, improve or purchase a building or part of a building from a developer within this area will be allowed to claim a reduction in taxable income.
Urban footprint	The total spatial extent of existing urban development.
Urban Footprint/ Built-Up/ Built-Area	The total spatial extent of existing urban development.
Urban Heat Island Effect	Where a metropolitan area is significantly warmer due to the heat absorbed by hard surfaces.
Urban management	Urban management involves the area-based involvement of and coordination with end users in the implementation, operation and maintenance of public facilities and services. In the local context, this may include the establishment of City Improvement Districts, Area Coordination Teams or Mayoral Urban Regeneration Programmes. In the long term successful urban management fosters a culture of joint accountability between the City and local stakeholders, reducing the potential of tension usually associated with top-down service delivery.
Urban Node	Area characterised by the intensity, mix and clustering of activities/land uses (including commercial/business development and associated employment opportunities, higher-order services and higher residential densities).
Urban Restructuring Zone	A well-located area where the national housing department's Capital Restructuring Grant subsidy, as defined in terms of the Social Housing Act, Act 16 of 2008, applies.
Urban Support Focus Areas (USFAs)	Spatially targeted areas that are faced with a combination of challenges including but not limited to infrastructure failure and service delivery challenges; high socio-economic need and crime rates and require a co-ordinated public investment and planning approach in the short to medium term. See Priority Local Facilitation Areas (PLFAs).
Vulnerability	The degree to which a system or population is susceptible to, or unable to cope with, adverse events.
Waste Management Facility	Means a place, infrastructure, structure or containment of any kind wherein, upon or at which a waste management activity takes place and includes a waste transfer station, container yard, landfill site, incinerator, a recycling or a composting facility.
Water Sensitive City	A Water Sensitive City is a settlement that serves as a potential water supply catchment, providing a range of different water sources at a range of different scales, and for a range of different uses; provides ecosystem services and a healthy natural environment, thereby offering a range of social, ecological, and economic benefits; and consist of water sensitive communities where citizens have the knowledge and desire to make wise choices about water, are actively engaged in decision-making, and demonstrate positive behaviours such as conserving water at home and not tipping chemicals down the drain.
Water-sensitive urban design	Minimises disruption of the natural water cycle by reducing runoff, attenuating flooding, and treating runoff before discharge into the receiving waters, whilst at the same time increasing the amenity value of water systems, and reducing the cost of water infrastructure.
Working age population	Persons aged 15-64 years.

Water-sensitive urban design	Minimises disruption of the natural water cycle by reducing runoff, attenuating flooding, and treating runoff before discharge into the receiving waters. At the same time, it increases the amenity value of water systems, and reduces the cost of water infrastructure.
World Heritage Site	A natural or man-made site, area, or structure recognized as being of outstanding universal value to humanity as recognised by UNESCO.
Zoning	A category of directions setting out the purpose for which land may be used and the land use restrictions (e.g. height limits, building lines, bulk, and coverage) applicable in respect of the said category of directions by the scheme regulations.
Zoning scheme	A scheme comprising the development management scheme, zoning map and the zoning register. The zoning scheme applies to all land in the geographic area of the city.

TECHNICAL ANNEXURE 2: SCOPE OF THE DISTRICT SDF REVIEW

In addition to the changes required to the District SDFs in terms of the CTMSDF and more recent legislation, policy and strategy developments, the scope of the District SDF Review will generally be limited to the following areas:

1. A shift in focus from a strong policy document to include a strong implementation and enablement agenda incorporating and in some way directing, by providing strategic and holistic guidance, the sector departmental work;
2. The SDF content and process requirements that has to be changed emanating from inter alia the Spatial Planning and Land Use Management Act, Act 16 of 2013 (SPLUMA); Western Cape Land Use Planning Act, Act No. 3 of 2014 (LUPA); and the City of Cape Town Municipal Planning By-law (MPBL), 2015.
3. The requirements of a District SDF as set out in Section 20 and 21 of the SPLUMA and Section 10 of LUPA are attached in Appendix 1. Section 21 of SPLUMA: specifies certain elements for a review including (Appendix 1):
 - Reviewed population growth estimates for the next 5 years;
 - Estimates of economic activity and employment trends; and
 - Requirements for engineering infrastructure and services provision for existing and future development need to be included in an SDF review;
4. The Review of the District SDF will indicate how the City intends to intervene in its particular geographic space by means of the following SPLUMA principles, namely: See Appendix 2.
 - **Spatial justice:** reverse historic spatial planning patterns to prevent ghettoization and segregation, and the unfair allocation of public resources, to ensure that the needs of the poor are prioritised
 - **Spatial sustainability:** support sustainable patterns of consumption and production to prevent damage to the natural environment.
 - **Spatial resilience:** Reduce vulnerability to environmental degradation (natural and potentially also identified semi-natural environments), resource scarcity and climatic shocks by protecting and replenishing the ecological systems.
 - **Spatial quality:** Improve the aesthetic and functional features of the built environment to create livable, vibrant and valued places that allow for access and inclusion of all peoples.
 - **Spatial efficiency:** Support productive activity and jobs and minimise burdens on business. (Efficient transportation of people and goods, “easy” regulatory procedures)

- **Good Administration:** Cooperation amongst state institutions to advance service delivery, address poverty and realise the constitutional rights of citizens and the above principles.
5. Section 11(1) of the MPBL (Appendix 3) sets out, as it relates to the content requirements of the District SDF, that the District SDF must:
- Align to and refine the CTMSDF by incorporating local information that may require a subsequent change to the CTMSDF. In this regard the District SDF will be a refinement of the proposals and guidelines of the CTMSDF. The District SDF will therefore take into account: a) changing local, national and global dynamics; b) impacts of climate change and other major events; c) population, residential and economic growth trends; d) new and updated information (natural resources and infrastructure provision);
 - Align to municipal SDF;
 - Identify and depict important spatial elements
 - Provide land use guidelines that relate to :
 - i) Desirable land use patterns;
 - ii) Appropriate development densities and urban form;
 - iii) Provision of public open space and public facilities
 - iv) Environmentally sensitive areas; and
 - v) High potential agricultural land;
 - Show how spatial restructuring and integration will be achieved by indicating:
 - i) Areas where public and private development should be prioritised and facilitated;
 - ii) Areas where strategic intervention is required to enable desired changes to land use or urban form;
 - iii) Locations of future publicly-funded housing developments;
 - iv) Key infrastructure requirements to enable development of areas that have been prioritised
 - Support the CTMSDF by depicting spatially the coordinating alignment and integration of relevant sectoral plans and policies
 - In addition, the district SDFs will also include:
 - Implementation plans; and
 - Identify local areas requiring detailed planning.
6. In addition, the MPBL states the requirement to consider records of the CTMSDF-deviations, new legislation and recently Council-adopted strategies as well as comments received during the review process

7. Legislative and national policy changes since 2012, to be included in the review of the District SDFs, include:
 - Spatial Planning and Land Use Management Act, 2013, (Act 16 of 2013) ("SPLUMA");
 - Western Cape Land Use Planning Act, 2014 (Act 3 of 2014 ("LUPA);
 - City's Municipal Planning By-Law, 2015 (MPBL);
 - The repeal of the Land Use Planning Ordinance, No. 15 of 1985 (LUPO);
 - National Development Plan (NDP) and Integrated Urban Development Framework (IUDF);
 - Provincial Cabinet approval of the Western Cape Provincial Spatial Development Framework; and the Bioregional Plan 2015; and
 - Sector specific amendments to policy and legislation.

8. City of Cape Town strategies and policies that were approved since 2012 that have been incorporated include:
 - CTMSDF that incorporated the Transit Orientated Development (TOD) Strategic Framework;
 - Master planning for the different utility services;
 - City's adoption of the Environmental -, Economic Growth- and Social Development Strategies (ES, EGS and SDS);
 - City's approval of the Integrated Public Transportation Network (IPTN) and the approval of designated Public Transport Zones (PT Zones);
 - City's initiation of Integration Zone Planning and Investment Strategies and collaborative inter-governmental catalytic projects and programmes as reflected in the City's annual Built Environment Performance Plan (BEPP); and
 - New policies underway, e.g. Environmental Policy/ Sector Plan, Human Settlement Strategy, New Water Plan, etc.

9. Alignment to the CTMSDF and refine the CTMSDF by incorporating local information that may require a subsequent change to the CTMSDF. In this regard the District SDF will be a refinement of the proposals and guidelines of the CTMSDF by:
 - Reviewing, refining and identify ways to implement at a local level the CTMSDF vision, objectives, policy guidelines for the local context;
 - Aligning with the following CTMSDF guiding strategies:
 - Spatial strategy 1: Build an inclusive, integrated, vibrant city.
 - Spatial strategy 2: Manage urban growth, and create a balance between urban development and environmental protection.
 - Spatial strategy 3: Plan for employment, and improve access to economic opportunities.
 - Confirming the cadastral extent and delineation of Spatial Transformation Areas (STAs), i.e. Urban Inner Core, Incremental Growth and Consolidation Areas;

- Confirming the location, designation, and extent of district and local nodes, e.g. civic, transport, economic development, and environmental or corridors; and
 - Contextualise the land use model underpinning the CTMSDF at a district scale.
 - Providing more detailed guidance for the identified areas once the above hierarchy of nodes have been established. This will lead to more local area planning of the identified area, through local policy plans (e.g. Local SDFs), precinct plans or public investment frameworks, as required. However, this level of detailed planning has to be informed by, if it is to be relevant, amongst others, much needed updated land use and IPTN modelling and infrastructure planning.
10. The retention of and use as departure points the key strategies and policy statements of the approved CTMSDF and that these remain the basis of the review. See Appendix 4.
11. Investigations, similar to a land analysis, to inform decision making pertaining to the use and disposal of land. This will require a thorough understanding of the population dynamics, the availability and high level suitability of land, linked to the need for community and social facilities, including green infrastructure assets.

The aim is that this will result in proposals for: overall space planning; the identification of land that should not be disposed of; and allocation of land for particular land use needs, e.g. school, clinics, housing, green open spaces and recreational spaces, etc.

12. A strong focus on Local economic development planning by, amongst others:
- Using land use models (TOD), to direct where different types of land uses ought to be located, e.g. residential or non-residential land uses for city efficiency and sustainability;
 - Identifying sites (land), nodes and corridors (from city structure) that could help to stimulate economic development;
 - Through community inputs, identify strategic locations for economic development opportunity projects, e.g. incubation hubs, emerging entrepreneur support venues for workshops and retail, community gardens, and major projects;
 - Introduce policies and incentives to support and stimulate current and future economic areas, e.g. special enterprise areas, UDZ;
 - Introducing guidelines for the location and use of certain uses, e.g. taverns and house shops; and
 - Providing a platform for local area economic development projects formulation it into a policy and enablement plan (SDF);

- Identify areas to introducing overlay / base zones or incentives for micro or larger economic enterprises, e.g. main roads like Spine Road, Bellville, or TOD base zone etc.;
- Identify areas for proactive rezoning for economic development opportunities, e.g. as was done for Langa;
- Investigating the development of an economic index for land and its location to help business decision marketing; and
- Investigating special community development agencies / SPVs to implement projects and manage development processes.

13. An updated understanding of the development context, taking into account:

- Changing local, national and global dynamics;
- Impacts of climate change and other major events;
- Population, residential and economic growth trends; and
- New and updated information (natural resources and infrastructure provision).

14. Proposals for the repeal of outdated and conflicting policies, e.g. policies that contradict the recent policy shifts of the City.

15. The investigation of mechanisms to boost the right kind of implementation in the right areas. This could include:

- Environment: the EMF to be enhanced to identify areas for exclusion from the requirement to apply for environmental authorisation for selected listed activities in specific geographical areas (for example Atlantis)
- Heritage: Exclusion of areas from the application of Section 24 Heritage triggers, e.g. amongst others, the need for a HIA authorisation for consolidation of three erven or a development greater than 5000m²;
- Land use management: Identification of areas to be given additional/ special development guidelines, e.g. automatic additional rights or reduced / no public participation processes;
- Water use licence general authorisations; and
- Incentives to stimulate the right kind of development in the right location.

These mechanisms will require more detailed work from the respective line departments to inform the District SDF proposals and processes.

Note: Urban management, social and local economic development processes should ideally be initiated, led by the appropriate departments. These processes may run in parallel and draw from the infrastructure of the District SDF Review process to develop appropriate district level strategies for their respective intervention programmes. This is to ensure not only built environment interventions but also a range of parallel interventions, covering the holistic needs of the communities, be formulated for implementation.

Appendixes:

Appendix 1: Requirements of an SDF: SPLUMA Sections 20 and 21 & LUPA Section 10

Appendix 2: Principles Extracted from SPLUMA

Appendix 3: Section 11(1) of the MPBL

Appendix 4: CTMSDF: Key strategies and policy statements

Appendix 1: Requirements of a Spatial Development Framework, SPLUMA Sections 20 and 21 and LUPA Section 10

Preparation of a Municipal Spatial Development Framework (MSDF)

20. (1) The Municipal Council of a municipality must by notice in the Provincial Gazette adopt a municipal spatial development framework for the municipality.

(2) The municipal spatial development framework must be prepared as part of a municipality's integrated development plan in accordance with the provisions of the Municipal Systems Act.

(3) Before adopting the municipal spatial development framework contemplated in subsection (1) and any proposed amendments to the municipal spatial development framework, the Municipal Council must—

- (a) give notice of the proposed municipal spatial development framework in the Gazette and the media;
- (b) invite the public to submit written representations in respect of the proposed municipal spatial development framework to the Municipal Council within 60 days' after the publication of the notice referred to in paragraph (a);
and
- (c) consider all representations received in respect of the proposed municipal spatial development framework.

Content of a Municipal Spatial Development Framework (MSDF)

21. A Municipal Spatial Development Framework must —

- (a) give effect to the development principles and applicable norms and standards set out in Chapter 2;
- (b) include a written and spatial representation of a five-year spatial development plan for the spatial form of the municipality;
- (c) include a longer term spatial development vision statement for the municipal area which indicates a desired spatial growth and development pattern for the next 10 to 20 years;
- (d) identify current and future significant structuring and restructuring elements of the spatial form of the municipality, including development corridors, activity spines and economic nodes where public and private investment will be prioritised and facilitated;

- (e) include population growth estimates for the next five years;
- (f) include estimates of the demand for housing units across different socio-economic categories and the planned location and density of future housing developments;
- (g) include estimates of economic activity and employment trends and locations in the municipal area for the next five years;
- (h) identify, quantify and provide location requirements of engineering infrastructure and services provision for existing and future development needs for the next five years;
- (i) identify the designated areas where a national or provincial inclusionary housing policy may be applicable;
- (j) include a strategic assessment of the environmental pressures and opportunities within the municipal area, including the spatial location of environmental sensitivities, high potential agricultural land and coastal access strips, where applicable;
- (k) identify the designation of areas in the municipality where incremental upgrading approaches to development and regulation will be applicable;
- (l) identify the designation of areas in which—
 - (i) more detailed local plans must be developed; and
 - (ii) shortened land use development procedures may be applicable and land use schemes may be so amended;
- (m) provide the spatial expression of the coordination, alignment and integration of sectoral policies of all municipal departments;
- (n) determine a capital expenditure framework for the municipality's development programmes, depicted spatially;
- (o) determine the purpose, desired impact and structure of the land use management scheme to apply in that municipal area; and
- (p) include an implementation plan comprising of—
 - (i) sectoral requirements, including budgets and resources for implementation;
 - (ii) necessary amendments to a land use scheme;
 - (iii) specification of institutional arrangements necessary for implementation;

(iv) specification of implementation targets, including dates and monitoring indicators; and

(v) specification, where necessary, of any arrangements for partnerships in the implementation process.

Appendix 2: The Spatial Planning and Land Use Management Act Principles

The following principles apply to spatial planning, land development and land use management:

(a) The principle of spatial justice, whereby—

- (i) Past spatial and other development imbalances must be redressed through improved access to and use of land;
- (ii) Spatial development frameworks and policies at all spheres of government must address the inclusion of persons and areas that were previously excluded, with an emphasis on informal settlements, former homeland areas and areas characterised by widespread poverty and deprivation;
- (iii) Spatial planning mechanisms, including land use schemes, must incorporate provisions that enable redress in access to land by disadvantaged communities and persons;
- (iv) land use management systems must include all areas of a municipality and specifically include provisions that are flexible and appropriate for the management of disadvantaged areas, informal settlements and former homeland areas;
- (v) Land development procedures must include provisions that accommodate access to secure tenure and the incremental upgrading of informal areas; and
- (vi) a Municipal Planning Tribunal considering an application before it, may not be impeded or restricted in the exercise of its discretion solely on the ground that the value of land or property is affected by the outcome of the application;

(b) The principle of spatial sustainability, whereby spatial planning and land use management systems must—

- (i) promote land development that is within the fiscal, institutional and administrative means of the Republic;
- (ii) Ensure that special consideration is given to the protection of prime and unique agricultural land;
- (iii) uphold consistency of land use measures in accordance with environmental management instruments;
- (iv) Promote and stimulate the effective and equitable functioning of land markets;

(v) Consider all current and future costs to all parties for the provision of infrastructure and social services in land developments;

(vi) Promote land development in locations that are sustainable and limit urban sprawl; and

(vii) Result in communities that are viable;

(c) The principle of efficiency, whereby—

(i) land development optimises the use of existing resources and infrastructure;

(ii) decision-making procedures are designed to minimise negative financial, social, economic or environmental impacts; and

(iii) development application procedures are efficient and streamlined and timeframes are adhered to by all parties;

(d) The principle of spatial resilience, whereby flexibility in spatial plans, policies and land use management systems are accommodated to ensure sustainable livelihoods in communities most likely to suffer the impacts of economic and environmental shocks; and

(e) The principle of good administration, whereby—

(i) all spheres of government ensure an integrated approach to land use and land development that is guided by the spatial planning and land use management systems as embodied

in this Act;

(ii) all government departments must provide their sector inputs and comply with any other prescribed requirements during the preparation or amendment of spatial development frameworks;

(iii) the requirements of any law relating to land development and land use are met timeously;

(iv) the preparation and amendment of spatial plans, policies, land use schemes as well as procedures for development applications, include transparent processes of public participation that afford all parties the opportunity to provide inputs on matters affecting them; and

(v) policies, legislation and procedures must be clearly set in order to inform and empower members of the public.

Appendix 3: Section 11(1) of the Municipal Planning By-Law (2015)

District Spatial Development Frameworks (DSDFs)

(1) The Municipal Council may adopt a District Spatial Development Framework for a specified geographic area within the geographical area of the City.

(2) A District Spatial Development Framework must –

- (a) align with and give further effect to the municipal spatial development frameworks;

- (b) identify and depict on a map current and future significant elements which give structure or spatial order to a settlement including road circulation networks, public transport systems, public open spaces, public facilities, and external engineering services;

- (c) provide land use management guidelines that relate to –

- (i) desirable land use patterns;

- (ii) appropriate development densities and urban form;

- (iii) provision of public open space and public facilities;

- (iv) environmentally sensitive areas; and

- (v) high potential agricultural land;

- (d) Provide a spatial representation to support spatial restructuring and integration within the district by indicating –

- (i) areas where public and private development should be prioritised and facilitated;

- (ii) areas where strategic intervention is required to enable desired changes to land

- use or urban form;

- (iii) locations of future publicly-funded housing developments;

- (iv) key infrastructure requirements to enable development of areas that have been

- prioritised;

- (e) Support the municipal spatial development framework by depicting spatially the coordination, alignment and integration of relevant sectoral plans or policies of City departments;

- (f) Include an implementation plan setting out how the proposals of the district spatial development framework is to be achieved; and

(g) Identify areas where more detailed local spatial development frameworks must be developed.

Appendix 4: Cape Town Metropolitan Spatial Development Framework

Key Strategies:

1. Spatial strategy 1: Building an inclusive, integrated, vibrant city

The City is intent on building a more inclusive, integrated and vibrant city that addresses the legacies of apartheid. Key commitments are to address existing imbalances in the distribution of different types of residential development and avoid the creation of new structural imbalances in the delivery of services. The desired outcomes are a greater mix of income groups, land uses, population density, and the adequate and equitable provision of social facilities, recreational spaces and public institutions.

Imperatives for this spatial strategy are:

- Transforming informal settlements into economically and socially integrated neighbourhoods;
- Forging public-private partnerships to provide and diversify integrated housing delivery;
- Identifying, conserving and managing the heritage resources, cultural landscapes, scenic routes and destination places fundamental to Cape Town's unique sense of place in line with legal requirements, including those of the National Heritage Resources Act;
- Celebrating Cape Town's diverse historical legacies through appropriate management of urban form, architectural design, signage and artwork, and the various land use management tools provided for in the Development Management Scheme;
- Maintaining and creating quality, safe open space systems and public spaces, utilising partnerships and commitments from both the public and private sector to optimise existing facilities, whilst strategically locating new ones; and
- Planning and managing collaboratively in creative and innovative management arrangements to ensure operational sustainability and reduce operational costs.

2. Spatial strategy 2: Manage urban growth, and create a balance between urban development and environmental protection

The City actively promotes an urban form with higher densities and mixed land use patterns within an urban inner core, supported by an extensive and efficient bus rapid transit (BRT) and rail network. Through this form, it wants to achieve developmental outcomes such as more sustainable use of land and natural resources, lower carbon emissions, more efficient use of infrastructure, effective and efficient public transport systems and social amenities.

Imperatives for this spatial strategy are:

- Making more efficient use of non-renewable resources, such as land, water and biodiversity, including protecting and maintaining existing surface and groundwater resources and sustainably managing existing and future water supplies;
- Using the natural environment to support spatial justice by enhancing access for all citizens to a quality open space network, offering community, recreational, non-motorised transport and economic opportunities;
- Avoiding or appropriately managing any negative development impact on natural resources, considering their finite nature and the costs relating to rehabilitating or mitigating degraded natural areas;
- Taking into account biodiversity, aquatic resources and networks as well as agricultural areas when planning new development; and
- Actively pursuing national biodiversity targets as well as those identified in the City's Bioregional Plan.

3. Spatial strategy 3: Plan for employment, and improve access to economic opportunities

Cape Town's current and future spatial form and function supports or inhibits the city's immediate and longer-term economic prospects. The extent to which Cape Town realises its spatial development goals is, directly linked to its ability to sustain employment-generating economic growth in the medium term and to reduce accessibility costs for the urban poor.

Imperatives for this spatial strategy are:

- Establishing and maintaining a liveable, vibrant and productive urban environment through effective urban management and the facilitation of integrated transport and land use;
- Creating and attracting 'job-rich' investment that will ensure integrated, sustainable communities by providing new and maintaining existing infrastructure.
- Providing services aimed at promoting social cohesion and enhancing social mobility in identified areas in greatest need;
- Facilitating economic growth and responding appropriately to the spatial needs of the economic sectors that are attracted to and operate in Cape Town

Policy Statements:

SPATIAL STRATEGY 1: BUILDING AN INCLUSIVE, INTEGRATED, VIBRANT CITY	
POLICY NO.	POLICY STATEMENT
P1	Support the intensification and diversification of land use in areas supportive of transit-oriented development
P2	Ensure that development proposals provide an adequate and equitable distribution of social facilities, recreational space and public institutions
P3	Redress existing imbalances in the distribution of different types of residential development, and actively pursue integration outcomes in future decision-making.
P4	Transform marginalised areas and informal settlements into economically and socially integrated neighbourhoods.
P5	Encourage public/private partnerships to develop integrated human settlements and diversify housing delivery.
P6	Support incremental housing delivery methods and tenure in support of a single property market.
P7	Respond to informality by proactively addressing current regulatory challenges.
P8	Unlock employment-generating and livelihood opportunities within the city's marginalised areas
P9	Support private sector development initiatives in Integration Zones and areas of economic potential that are easily accessible from the city's marginalised areas.
P10	Identify land for land reform and publicly-led housing delivery programmes.
P11	Promote quality urban design and contextual fit.
P12	Identify, conserve and manage heritage resources, including cultural landscapes.
P13	Ensure access to and provide information about public heritage resources.
P14	Create an enabling environment for urban regeneration that allows buildings and sites of historical and architectural significance to make a positive contribution to the economy and quality of urban life.
P15	Celebrate Cape Town's diverse historical legacies through urban form, architectural design, interpretive / information signage and, where appropriate, artwork.
P16	Provide positive spaces for cultural and social ceremonies and life-related events.
P17	Carefully manage land uses and interventions along identified scenic routes, and in places of scenic and visual quality.
P18	Provide efficient access to destination places where potential exists, especially in or near areas of high social need.

SPATIAL STRATEGY 2: MANAGE URBAN GROWTH, AND CREATE A BALANCE BETWEEN URBAN DEVELOPMENT AND ENVIRONMENTAL PROTECTION

POLICY NO.	POLICY STATEMENT
P19	Promote appropriate land use intensity.
P20	Enable resource efficient development.
P21	Direct urban growth away from risk areas/activities.
P22	Discourage urban growth in areas at risk from natural hazards/coastal processes which are expected to be amplified by climate change impacts.
P23	Increase efforts to protect and enhance biodiversity networks at all levels of government.
P24	Reduce the impact of urban development on river systems, wetlands, aquifers, aquifer recharge areas and discharge areas.
P25	Promote risk averse and sustainable urban development along the coast.
P26	Protect valuable agricultural areas, viable farmed areas and horticultural areas from urban encroachment, and support urban agriculture.
P27	Adopt a proactive planning approach to mining resource management.
P28	Support appropriate development and activities in rural areas, and in and around unique and culturally significant rural settlements.
P29	Rationalise and proactively manage smallholdings.

SPATIAL STRATEGY 3: PLAN FOR EMPLOYMENT, AND IMPROVE ACCESS TO ECONOMIC OPPORTUNITIES

POLICY NO.	POLICY STATEMENT
P30	Support investors through improved information, cross-sectoral planning and the removal of red tape.
P31	Introduce land use policies and mechanisms that will support the development of small businesses (both informal and formal).
P32	Strengthen and improve access to existing business nodes through area-based interventions which are geared towards local assets and constraints.
P33	Encourage uptake of available incentives to encourage investment in the Urban Inner Core.
P34	Promote regional economic planning.
P35	Maintain, improve and expand an integrated public transport service informed by the transport network.
P36	Ensure that new urban development is supported by appropriate public transport infrastructure and services.
P37	Include walking and cycling as essential components of land use planning.
P38	Review parking policies to encourage use of the most context-specific and appropriate modal travel choice.
P39	Reinforce and enhance metropolitan development corridors.
P40	Encourage medium-higher density forms of urban development to locate on bus, rail or intermodal stations as well as along corridors and in nodes.
P41	Support the complementary development of the area surrounding CTIA airport in order to further leverage its benefits and opportunities.
P42	Create and manage a functional interface between ports/harbours.

TECHNICAL ANNEXURE 3: LEGAL POLICY AND CONTEXT

3.1. Legislative Context

The legislative context applicable to the District SDFs has changed considerably since 2012. Under the previous planning regime, the Western Cape Government determined a number of municipal planning matters in terms of the Development Facilitation Act, Act 67 of 1995 and the Land Use Planning Ordinance, 15 of 1986 (LUPO). These have subsequently been repealed and replaced by SPLUMA in 2013, the Western Cape Land Use Planning Act, Act 3 of 2014 (LUPA) and the City's Municipal Planning By-Law, 2015 (MPB-L).

- Entrenchment of the autonomous mandate of municipalities in municipal planning¹ (land development, land use management, MSDF approval) with dual approval by the provincial government no longer applicable.
- Establishment of Municipal Planning Tribunals and Appeals structures by municipalities to determine land development applications.
- Development of a single and inclusive land use scheme for the entire municipality;
- Development of SDFs by all three spheres of government, guided by development principles;
- Strengthened intergovernmental support through enforcement, compliance and monitoring.
- Increasing alignment of authorisations processes where necessary on policies and legislation impacting land development applications and decision-making.

In addition to these laws a range of legal informants influence spatial planning in the heritage, environmental, transport and agricultural sectors. This legislation is outlined in Table D2 of the MSDF 2018.

3.1.1. National and Regional Planning Informants

The District SDFs is developed and aligned to the MSDF and as such is aligned to a range of national and provincial planning informants including:

- National Development Plan -2030
- Integrated Urban Development Framework (2015)
- Provincial Spatial Development Framework (2015)
- Bioregional Plan (2015)
- Greater Cape Metropolitan Regional Spatial Implementation Framework 2017

The details of these informants is contained in *Technical Supplement D* of the MSDF 2018.

¹ Municipal competencies are contained in Schedule 4B and 5B of the Constitution of the Republic of South Africa, 1996

3.1.2. Metropolitan Planning Informants

The District SDFs seeks to detail and give greater expression to the strategies, proposals and transformation focus of the MSDF 2018. Proposals regarding land development and public investment in space have thus been informed by:

A. The spatial principles of inward growth and investment and the transformation vision reflected in the IDP and MSDF

The IDP transformation priorities manifest in and are impacted by the built environment. Ensuring spatial transformation via dense and transit-oriented growth and development, anchored by an efficient, integrated transport system and in turn building integrated communities are fundamental to the Metropolitan Planning Outlook and in turn this District Plan review which must align to the MSDF.

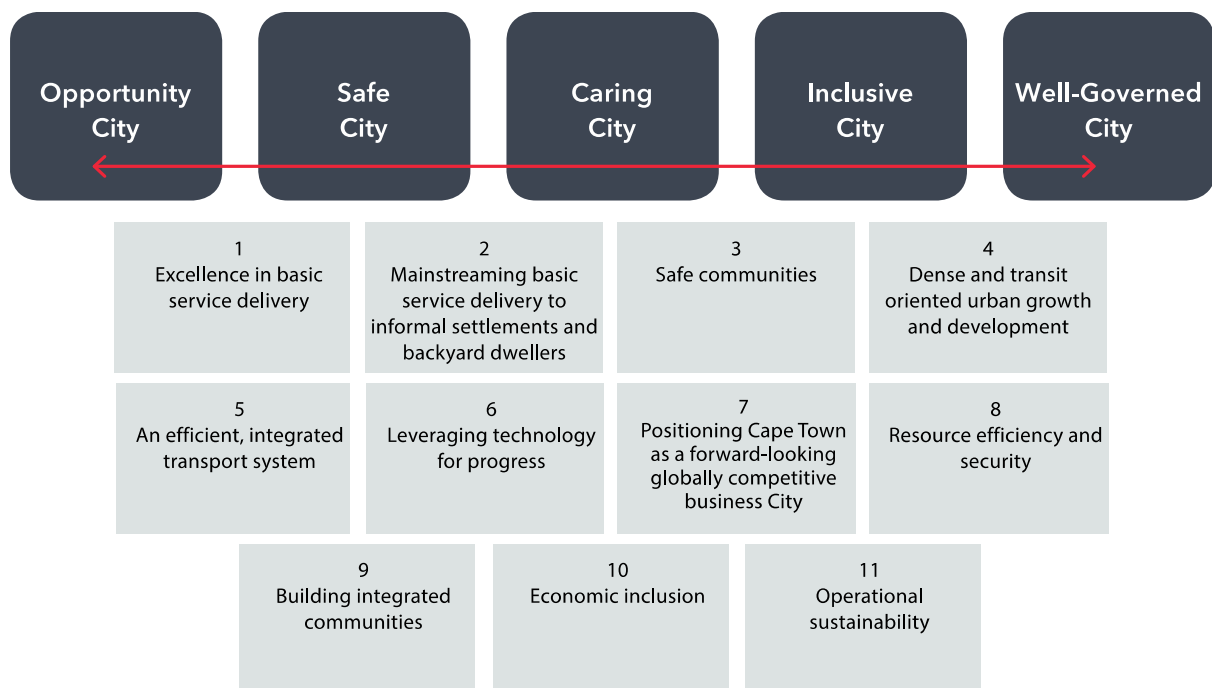


Figure 1: IDP pillars and transformation priorities

The City's spatial transformation focus is on **inward growth and investment** to support infrastructure in support dense, diverse and transit oriented land uses. The Vision for spatial development in the City is as follows:

"The City is intent on building – in partnership with the private and public sector – a more inclusive, integrated and vibrant city that addresses the legacies of apartheid, rectifies existing imbalances in the distribution of different types of residential development, and avoids the creation of new structural imbalances in the delivery of services. Key to achieving this spatial transformation is transit-oriented development (TOD) and the densification and diversification of land uses." MSDF 2018

Connected, inward growth is the most cost-effective way of reducing the social and economic costs of the current inefficient urban form. The MSDF motivates for land use intensification based on transit-oriented development (TOD). With public transport and the optimisation of associated locational benefits fundamental to the restructuring and spatial transformation agenda in Cape Town, Council approved the Comprehensive TOD land use scenario. This forms the strategic and policy basis for Cape Town to transform the sprawling, predominantly low density, mono-use city by reducing travel times and increasing the efficiency of infrastructure networks with benefits to all.

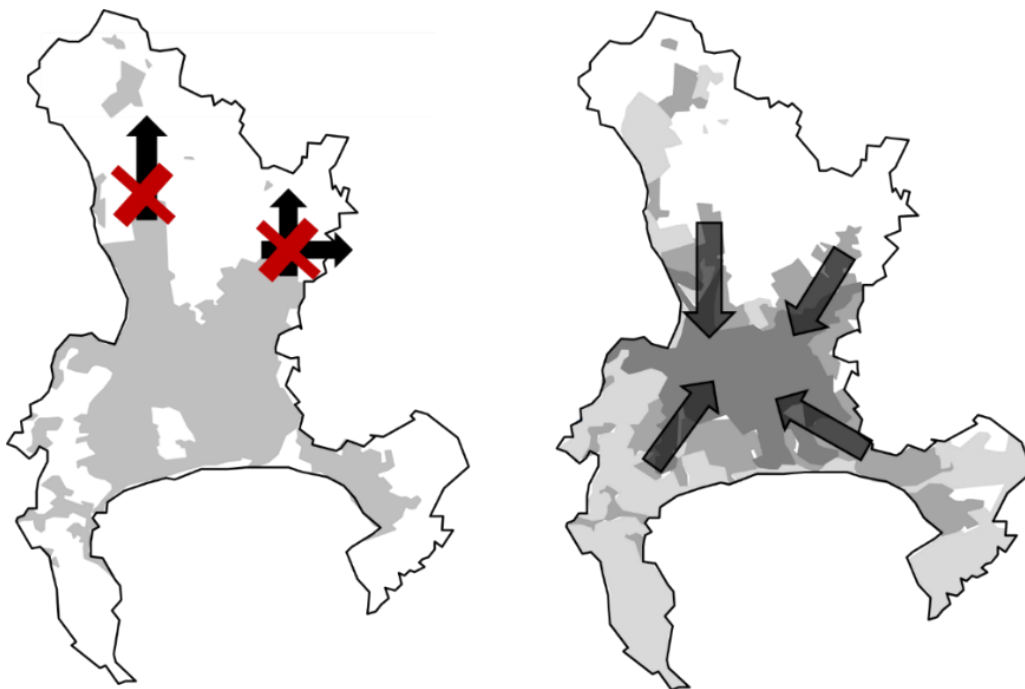


Figure 2: 2012 versus 2017 long-term spatial vision

B. The land uses, structuring elements and areas of intensification proposed

The dense, transit oriented growth vision for the City implies a greater mix of residential and non-residential land use (diversification) through the increased use of space, both vertically and horizontally (densification). This can be achieved within existing areas or properties and new developments with an increased number of dwelling units and should be encouraged in locations with good public transport access, concentrations of employment, commercial development and other amenities.

Development corridors, areas of densification and land use intensification and transit accessible precincts (TAPS), are important spatial restructuring elements in the MSDF, acting as generators and attractors of people and trips, contributing to economic growth and public transport viability. One of the key roles of the District plan is to differentiate between these conceptual structuring elements to ensure the areas of intensification are appropriately nuanced according to the development needs and growth trends in the district.

Infrastructure capacity, renewal and provision will also impact the structure of Cape Town's urban form and must be aligned with projected land use intensification. Prioritising areas where infrastructure investment is needed to support appropriate intensification will be a key outcome of the District Plan process.

C. The investment rationale proposed in the description Spatial Transformation areas

The City is committed to "employing a range of new generation urban growth management tools and processes" and considering "the designation of priority areas, managed growth areas and protection areas with associated development parameters and procedural guidelines". Spatial transformation is based on reversing the impact of apartheid spatial planning by creating more opportunities for more people in highly connected areas. Further, it seeks to counter the creation of new low-income communities on the periphery of the city and the need for the poor to spend a disproportionate amount of their income on transport. The basis for growth management in the City is established via four primary Spatial Transformation Areas (STAs). The Unique areas (area x in this district) where the visions and transformation focus must be prioritised locally, is excluded from these transformation areas.

- An Urban Inner Core (estimated 17% of geographic area of the City) – UIC;
- Incremental Growth and Consolidation Areas (20%) – IGA;
- Discouraged Growth Areas (28%) – DGA;
- Critical Natural Areas (34%) – CNA

Map 4 and Tables 3 and 4 in the MSDF highlight the informants, intended outcomes and investment focus of the Spatial Transformation areas.

D. Development Directives:

The development directives are those environmental, resource, heritage and risk related spatial aspects ordinarily governed by additional or parallel regulatory processes beyond those associated with land use process and applications made via the MPB-L. It is envisaged that the District Plans will provide more detail to the development directives through the Green Infrastructure Plan. Adding further weight, the EMF component which remains in place from the 2012 DP.

E. Strategies and policy guidelines

The Spatial Strategies in the MSDF emanate directly from the IDP and include:

Spatial strategy 1: Build an inclusive, integrated, vibrant city.

Spatial strategy 2: Manage urban growth, and create a balance between urban development and environmental protection

Spatial strategy 3: Plan for employment, and improve access to economic opportunities.

Collectively, they provide the spatial direction that:

- Establishes a corporate spatial perspective which informs the review of this District plan and other sector plans;
- Informs submissions and motivations for development proposals and applications from the public and private sector; and
- Directly affects the assessment of applications under delegation or via the Municipal Planning Tribunal.

A comprehensive list of policies associated with these three strategies is included in Technical Supplement A of the MSDF.

TECHNICAL ANNEXURE 4: ENVIRONMENTAL MANAGEMENT

4.1 Green Infrastructure

Green Infrastructure (GI) can be defined as “a *strategically planned, designed, and managed network of natural open spaces and ‘engineered’ ecological systems, with other environmental features, which provide ecological, community and infrastructure services.*”

The City has embarked on the development of a Green Infrastructure Programme (GIP), the purpose thereof being the protection and enhancement of existing natural assets and the promotion and creation of new GI assets, in order to underpin the sustainability of Cape Town, enhance the city's living environment and improve its resilience to the effects of climate change.

A component of the GIP is the preparation of a Green Infrastructure Network (GINet), based on natural assets and green open spaces in the city, the benefits they provide, and the opportunities that they present in terms of selected predefined ecosystem services (ES). They form a network through connection via existing and potential green corridors.

The approach taken to the mapping of the GINet, has utilised officials' local knowledge to identify, via a series of questions and criteria, those areas in the city that can be considered to be GI, by qualifying and quantifying their relative ES value for predefined ES. The spaces considered are based on typologies, are generally greater than 1ha in size, and are in both public and private ownership.

The output of that mapping exercise is the Green Infrastructure Network (GINet). This layer is intended to be an informant when considering land-use and development applications, and should be taken into consideration when evaluating proposals.

Each space, displayed in varying shades of green, can be ‘interrogated’ for the information relating to it, and its ascribed value. This space specific information needs to be considered when conceptualising, designing, planning and ultimately developing a property which has been identified as providing GI services. A GINet viewer is being created, which will be available on the CityMap Viewer.

The space specific information displayed, reflects the responses to 9 general questions and 23 ecosystem evaluation questions (see below), that were posed for each space. It also provides the contribution made to the 3 ecosystem service themes the questions have been grouped into, namely infrastructural, ecological and social services. Infrastructural questions relate to water and coastal zone protection aspects, and essentially investigate ES that provide nature-based solutions that support areas which would otherwise need hard or grey infrastructure interventions if lost. Ecological questions relate to ecological-related ES, e.g. habitat and connectivity, species; and social questions relate to social-cultural ES, including how the space is used.

The evaluation questions are rated in terms of the space providing none, low, medium or high contribution of the service, and the scores from each question are then totalled to provide a Total GI value, which is translated into a level of Total GI provided by the space. The level of Total GI of each space is categorised into low, low-medium, medium, medium-high, high or very high.

It is important to note that the **Total GI** rating is the **cumulative score** of the 23 questions relating to the various ecosystem services. **A lower rating does not imply that a space is not important**; it may be very important for a specific ecosystem service.

Scores have also been normalised to determine the contribution of each theme to the total GI value. Where these contribute more than 10% of the total GI value, they are regarded as being a key service provision component (theme). The information can also be selected to display as per the ecosystem service provision components or themes.

Potential to improve a space is identified for selected ecosystems services only – indicated by an asterisk (*) on the list of questions below. Where potential is present this is noted, but not allocated a rating. On the mapping (on the forthcoming GI Viewer), potential is indicated by a cross hatching over the Total GI value. It is important to note that a low GI value does not mean that the space does not have value in terms of its potential - where focussed interventions could improve the space's ES provision and that of adjacent or surrounding GI assets.

Additional information has been captured as relevant from discussions during the evaluation session.

A summary of the questions posed is below.

General questions (9)

Q	
1	Does this space have a wetland/seep/stormwater pond/dam, etc.?
2	Is this space within the Coastal Urban Edge?
3	Is this space part of the terrestrial Biodiversity Network?
4	Does this space include a river/stream (natural, semi-natural, canalised, channelized)?
5	Is this space a Nature Reserve / Conservation Area / Protected Natural Environment?
6	Is this space accessible to the public?
7	Does it have the potential to provide industrial and building resources (i.e. coincides with mapped resources – e.g. silica sand, timber, building sand, kaolin)?
8	Is this space perceived as safe?
9	Does this space have trees (>3m in height)? If yes, what is their percentage canopy cover? (none = 0% or negligible; low = 5-15%; medium = 15-50%; high = >50%)

Ecosystems service questions (23)

Q		Infrastructural questions
1	*	Does the space assist with water assimilation and purification? To what extent?
2		Is this space above a sand aquifer?
3		Does the space contribute to water infiltration? To what extent?
4	*	Does the space assist with flood control? To what extent?
5		Does the space provide water? To what extent?
6	*	Does the space offer protection/buffering of built infrastructure against coastal processes or during coastal storm events? To what extent?

Q		Ecological questions
7		Does this space have indigenous vegetation? What relative percentage does it cover? (none = 0%; low = 5-25%; medium = 25-65%; high => 65%)
8		Does the space have threatened flora? How important is the flora?
9		Is the space evidently used by fauna listed as species of conservation concern or large fauna? To what extent?
10		Is this space evidently an indigenous faunal breeding, roosting, nursery, or den site (important for lifecycle / reproduction)? To what extent?
11	*	Is this space used for or does it provide opportunity for ecological connectivity? To what extent?
12		Is this space an area of high conservation value or, if not, does it act as a buffer to areas of high conservation value? To what extent?
13		Does this space support or allow for coastal processes? To what extent?

Q		Social questions
14		Do the trees in this space have a social, economic and/or cultural function? If yes, to what extent?
15		Is this space used for spiritual or cultural rituals and/or activities? If yes, to what extent?
16	*	Is this space being used for general public recreational/activities? If yes, to what extent?
17		Does this space have any cultural or heritage value or significance? What is its relative significance?
18	*	Is this space used for environmental education or research purposes? To what extent?
19		Do tourists visit this space or is it along a significant tourist route? To what extent?
20		Is there a significant viewshed or vista from the space adding aesthetic appeal? What is the relative value of the viewshed?
21		Does this space have aesthetic appeal and/or provide a sense of place or identity? What is the relative value?
22		Are natural resources harvested or extracted from this space for subsistence purposes? (e.g. Sand, medicinal plants, food/fish, kelp, mussels) To what extent?
23		Is the space used for agricultural or producing food? To what extent?

GI mapping and evaluation was undertaken during October 2018 – December 2019, using the February 2018 aerial photography as the basis for delineating spaces for evaluation. Open space that had been subsequently invaded, or for which development was at an advanced stage of planning approval, was excluded from the mapping exercise. Additional information captured has been edited in 2020. An update to the mapping was undertaken in 2021. This utilised 2021 aerial photography, in both a desktop comparison with 2018 aerial photography to determine change, as well as engagements with district staff.

Potential GINet corridors were mapped in 2020. These corridors run through the GIP polygons and form best-fit linkages in order to connect green spaces across the city. It takes ecological factors, as well as social and infrastructural factors into account. The corridor mapping was refined in 2021 to designate major green corridors i.e. existing connections associated with conserved areas or features (e.g. watercourses, road reserves, utility servitudes, tree-line streets), and 'flexible green corridors', which indicates that connection is required to be retained or created over that space, but that the actual alignment of the corridor needs definition and to be taken into account during a development/ redevelopment process. Ongoing refinement of corridors is planned.

Having well-maintained corridors in the city is essential to avoiding habitat fragmentation, promoting environmental connectivity, providing space for recreation and other activities, etc. The methodology and approach to creating the corridors is available.

4.2 Details of a proposed NEMA Urban Area for the City of Cape Town

4.2.1 What is the NEMA Urban Area?

The Listed Activities contained in the National Environmental Management Act (NEMA) Environmental Impact Regulations (2014, as amended), make provision for the adoption, by the Competent Authority (Department of Environmental Affairs & Development Planning) of a NEMA Urban Area. It is important to note that the NEMA Urban Area is something completely different to the Urban Edge typically portrayed in spatial development frameworks, although, in many cases they may be the same thing (the ideal situation). The main reason for this provision was to enable certain of the Environmental Impact Assessment (EIA) Regulations listed activities to take place within urban areas without the requirement to obtain environmental authorisation – and thus facilitate provision of infrastructure and services. The assumption behind this, is that urban environments are generally less sensitive to development, but in cities like Cape Town, this is not always the case. The provision for exclusion of some development activities when located within adopted NEMA Urban Areas (e.g. water and sewage pipelines) (see Addendum 1) from requiring environmental authorisation, can facilitate urban development. However, if the area in which these services are to be provided has, for example, critically endangered vegetation, removal of such vegetation for the pipeline will still trigger the requirement for an environmental authorisation and the associated Basic or Full Scoping EIA process.

The Listed Activities (2014, as amended) define NEMA Urban areas as:

'areas situated within the urban edge (as defined or adopted by the Competent Authority), or in instances where no urban edge or boundary has been defined or adopted, it refers to areas situated within the edge of built up areas'.

However, the Department of Environmental Affairs & Development Planning (DEA&DP), have indicated, that the City of Cape Town may propose a NEMA Urban Area according to the intent and objectives of its Integrated District Spatial Development Frameworks/Environmental Management Frameworks (SDFs/EMFs). They will then decide if it may be 'adopted' as a NEMA Urban Area. The Urban Edge, as proposed in the District SDFs/EMFs would also need to be adopted by DEA&DP.

4.2.2. Why should the City of Cape Town have an adopted NEMA Urban Area?

The main reason for having an 'adopted' NEMA Urban Area, is that there are a number of listed activities (i.e. activities in the NEMA EIA Regulation Listing Notices) that are excluded from requiring authorisation if they fall within an 'adopted' NEMA urban area. A list of these 'excluded' activities is given in Addendum 1. The CCT does not, as yet, have an 'adopted' NEMA Urban Area. This results in inconsistent decision making as to what is inside or outside the NEMA Urban Area. It is therefore better to have an agreed and adopted NEMA Urban Area, which will provide more certainty to developers, including the City. The revision of the district Spatial Development Plans, and their ultimate adoption as Environmental Management

Instruments (including an adopted NEMA Urban Area) provides an opportunity to remove yet one more area where there can be inconsistencies in decision making.

4.2.3. How does the NEMA Urban Area relate to the City of Cape Town Urban Edge?

The ideal situation is that the City's Urban Edge, and the NEMA Urban Area are the same, making for easy decision making. The City has undertaken workshops in the City's planning districts to try to maximise the extent to which the two coincide. There are however some areas where they are different, particularly if there is a large rural area or a conservation area adjacent to the Urban Edge, where urban development is not intended. It is possible, that through further consultation and revisions, that the Urban Edge and Urban Area could be the same.

4.2.4. Why does the NEMA Urban Area sometimes cover areas that may be considered environmentally sensitive?

It is very important to note that the NEMA Urban Area, as depicted in the City of Cape Town SDFs/EMFs does **not** indicate desirability or intent to develop an area. This is something that is often misunderstood, and can lead to confusion. The *Development Focus Areas* and more specifically, the *New Development Areas*, as depicted in the District SDFs/EMFs are where development is to be encouraged and supported.

It is, however recognised, that by placing the NEMA Urban Area designation over an environmentally sensitive environment, one may eliminate the need for an environmental authorisation process if only NEMA Urban Area excluded activities are applicable. Most sensitive areas will however, have either indigenous vegetation, or wetlands and streams that will trigger the requirement for an environmental authorisation. Other legislation, such as the National Water Act (Act 36 of 1998) and the National Heritage Resources Act (Act 25 of 1999) will also require authorisations with associated studies where wetlands and water courses are affected, or in the case of the National Heritage Resources Act (Act 25 of 1999), where cultural, archaeological and palaeontological assets may be affected, including visual impact and sense of place. In addition, it is also very important that the City, in its District SDFs/EMFs and supporting documents, clearly identify sensitive areas and ensure, through a variety of means, that their key characteristics and functioning are maintained, for example through identification of risk areas and edges such as floodplains, expanding the protected area network, and well implemented policies, strategies and by-laws. In addition, the Environmental Management Department is able to request specific studies to be done as part of the land use process.

So one may ask, why place the NEMA Urban Area over sensitive areas? The main reasons are that:

- In some instances, it is possible to do developments without affecting the sensitive components (for example placing infrastructure in already developed areas or along roads and servitudes).
- There can be significant cost and time savings if only the essential studies are done.

To ensure that there are no unintended consequences, it is essential that the City continue to improve its methods of retaining and improving all natural and semi-natural areas that provide ecological and infrastructural services. This includes ensuring all sensitive areas have the correct zoning. The developing Green Infrastructure Network, the Environmental Strategy and incorporation of environmental requirements into policies, procedures and by-laws across the city (all underway) will all play a role in improving the City's ability to protect and enhance its natural systems.

4.3 The Proposed Exclusions from the Trigger Activities Listed in Section 24 of NEMA

Given below are summarised descriptions of the Listed Activities contained in the Environmental Impact Assessment Regulations Listing Notices (2014, as amended) that are excluded from requiring environmental authorisation when they are located within an adopted NEMA Urban Area.

Table 1 gives those Listed Activities that are excluded when they take place in adopted NEMA Urban Areas. Table 2 gives those Listed Activities that are different (i.e. have different thresholds) when taking place inside or outside NEMA Urban Areas.

In all cases, the requirement for an environmental authorisation would still be applicable if any other Listed Activity is to take place, which does not have the Urban Area exclusion provision. For example, removal of critically endangered vegetation, or development in wetlands would still require environmental authorisation if the Listed Activity thresholds apply. The comments in the right hand column emphasise this fact. Please refer to the accompanying explanatory text.

Please note: These activity descriptions have been summarised from the EIA Regulations: please refer to the EIA Regulations for the full description.

Table 1: Listed Activities triggered outside Urban Areas but not inside Urban Areas: i.e. the activities below are excluded inside NEMA Urban Areas

Listing Notice (LN) & Activity Number	Activity	Comments/Implications
LN1, A1	Development of facilities or infrastructure for photovoltaic installations: - Where the electricity output is more than 10MW but less than 20MW <u>or</u> - Where the electricity output is 10MW or less but the extent of the facility covers an area in excess of 1ha.	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m ² or more endangered or critically endangered indigenous vegetation) and possibly the National Water Act (NWA).

L1, A9	Water & stormwater pipelines exceeding 1 000m in length: • With an internal diameter of 0,36m or more or • With a peak throughput of 120l/s or more	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m ² or more endangered or critically endangered indigenous vegetation) and possibly the NWA.
L1, A10	Pipelines for bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes, exceeding 1 000m in length: • With an internal diameter of 0,36m or more or With a peak throughput of 120l/s or more	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m ² or more endangered or critically endangered indigenous vegetation) and possibly the NWA. Any development in close proximity to watercourses will require a Water Use Licence (WUL) in terms of NWA.
L1, A12	Construction of dams, weirs, infrastructure or structures exceeding 100m ² in size • In a watercourse, • In front of a development setback or • Within 32m of a watercourse (where there is no development setback).	If construction takes place in the watercourse, NEMA will still be triggered (L1, A19) and the NWA will be triggered. The NWA will also be triggered if development does not take place in the watercourse but may negatively impact on the watercourse.
L1, A17	Development of fixed or floating jetties and slipways, tidal pools, embankments, rock revetments or stabilising structures including stabilising walls or infrastructure or structures with a development footprint of 50m ² or more.	L1, A19A will still be triggered if 5m ³ material or more is removed from, deposited into or moved in the sea, littoral active zone, 100m inland from the high-water mark of the sea, an estuary, the seashore.
L1, A24	New roads: • For which an EA was obtained for the route determination in terms of activity 5 in Government Gazette Notice 386 of 2006 or activity 18 in Government Notice 545 of 2010 or • With a reserve wider than 13,5m, or with no reserve where the road is wider than 8m	Even inside Urban Areas, if the new road requires the removal of 300m ² or more of endangered or critically endangered indigenous vegetation or requires construction to take place in a watercourse, NEMA will still be triggered. The NWA may also be triggered.

L1, A36	Expansion of photovoltaic installations where: • Electricity output will be increase by 10MW or more or • Regardless the increased output, the development footprint will be expanded by 1ha or more	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m² or more endangered or critically endangered indigenous vegetation) and possibly the NWA.
L1, A45	Expansion of water or storm water pipelines where existing infrastructure: • Has an internal diameter of 0,36m or more or • Has a peak throughput of 120l/s or more and ◦ Where the facility or infrastructure is expanded by more than 1 000m in length or ◦ Where the throughput capacity of the facility or infrastructure will be increased by 10% or more.	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m² or more endangered or critically endangered indigenous vegetation) and possibly the NWA.
L1, A46	Expansion of sewage, effluent, process water, waste water, return water, industrial discharge or slimes pipelines where existing infrastructure: • Has an internal diameter of 0,36m or more or • Has a peak throughput of 120l/s or more and ◦ Where the facility or infrastructure is expanded by more than 1 000m in length or Where the throughput capacity of the facility or infrastructure will be increased by 10% or more.	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m² or more endangered or critically endangered indigenous vegetation) and possibly the NWA. Any development in close proximity to watercourses will require a WUL in terms of NWA anyway.

L1, A48	Expansion of structures, infrastructure, dams or weirs where the footprint or water surface area is expanded by 100m ² or more.	If expansion requires the removal of indigenous vegetation or takes place in watercourses, NEMA will still be triggered. Construction in a watercourse will also trigger the NWA.
L1, A54	Expansion of facilities in the sea, an estuary, within the littoral active zone, in front of a development setback or if no development setback exists, within a distance of 100m inland of the high-water mark of the sea.	Expansion activities in these areas requiring the removal, moving or infilling of 5m ³ or more material in these areas will still trigger NEMA.
L1, A56	Widening of a road by more than 8m, or lengthening of a road by more than 1km: • Where the existing reserve is wider than 13,5m or • Where no reserve existing, where the existing road is wider than 8m.	If the widening or lengthening takes place in an environmentally sensitive area, the removal of 300m ² or more endangered or critically endangered vegetation will still be a trigger. Construction in a watercourse will also trigger NEMA and the NWA.
L2, A1	Photovoltaic installations, with an electricity output of 20MW or more.	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m ² or more endangered or critically endangered indigenous vegetation) and possibly the NWA.
L2, A27	Development of a road • With a reserve wider than 30m or • Catering for more than one lane of traffic in both directions.	If the new road is located in an environmentally sensitive area, the removal of 300m ² or more endangered or critically endangered vegetation will still be a trigger. Construction in a watercourse will also trigger NEMA and the NWA.
L3, A1	Billboards exceeding 18m ² in size.	If the construction of the billboards requires the removal of 300m ² or more of endangered or critically endangered indigenous vegetation, NEMA will still be triggered. Any development in watercourses will also trigger NEMA and the NWA.
L3, A7	Aircraft landing strips and runways 1,4km and shorter.	If the activity requires the removal of 300m ² of endangered or critically endangered indigenous vegetation, NEMA will still be triggered. Any development in watercourses will also trigger NEMA and the NWA.
L3, A8	Development and related operation of above ground cableways and funiculars.	If the activity requires the removal of 300m ² or more of endangered or critically endangered indigenous vegetation, NEMA will still be triggered. Any development in watercourses will also trigger NEMA and the NWA.

L3 A14	Development of dams, weirs, infrastructure or structure with a footprint exceeding 10m² where development occurs: • Within a watercourse, • In front of a development setback, • If no development setback has been adopted, within 32m of the watercourse.	If the activity requires the removal of 300m² or more of endangered or critically endangered indigenous vegetation, NEMA will still be triggered. Any development in watercourses will also trigger NEMA (infilling, removal or moving of more than 10m³ in the watercourse) and the NWA.
L3, A19	Expansion of runways or aircraft landing strips where the expanded aircraft of landing strip will be longer than 1,4km in length.	If the expansion requires the removal of 300m² or more of endangered or critically endangered indigenous vegetation, NEMA will be triggered. Any development in watercourses will also trigger NEMA (infilling, removal or moving of more than 10m³ in the watercourse) and the NWA.
L3, A20	Expansion and related operation of above ground cableways and funiculars where the development footprint will be increased.	If the expansion requires the removal of 300m² or more of endangered or critically endangered indigenous vegetation, NEMA will be triggered. Any development in watercourses will also trigger NEMA (infilling, removal or moving of more than 10m³ in the watercourse) and the NWA.
L3, A23	Expansion of dams, weirs, structures or infrastructure by 10m² where expansion occurs • Within a watercourse, • In front of a development setback, • If no development setback exists, within 32m of the watercourse.	If the expansion requires the removal of 300m² or more of endangered or critically endangered indigenous vegetation, NEMA will be triggered. Any development in watercourses will also trigger NEMA (infilling, removal or moving of more than 10m³ in the watercourse) and the NWA.

Table 2: Listed Activities that are different inside and outside Urban Areas

Listing Notice & Activity Number	Activity	Comments/Implications
L1. A5	Development of facilities or infrastructure for the concentration of poultry and chicks younger than 20 days.	The thresholds are different for inside and outside Urban Areas, farms/facilities inside Urban Areas have a lower threshold than outside Urban Areas. If the farm/facility is inside the urban area the activity will trigger faster.
L1, A11	Development of facilities or infrastructure for the transmission and distribution of electricity.	This activity triggers inside and outside the urban area, the thresholds are just different. If this activity does not trigger in an environmentally sensitive area, the removal of 300m ² or more endangered or critically endangered indigenous vegetation or construction in watercourses will trigger NEMA. Construction in watercourses will also trigger the NWA.
L1, A28	Residential, mixed, retail, commercial, industrial or institutional development where land was used for agriculture, game farming, equestrian purposes or afforestation on or after 1 April 1998.	This activity has different thresholds for inside and outside the urban area. Inside the urban area the threshold to trigger the activity is higher than outside the urban area making it easier to transform the land inside the urban area. If construction takes place in watercourses, NEMA will trigger. The NWA will be triggered if construction takes place in watercourses or in close proximity to watercourses.
L1, A40	Expansion and related operation of facilities for the concentration of poultry, excluding chicks younger than 20 days.	The thresholds are different for inside and outside Urban Areas, farms/facilities inside Urban Areas have a lower threshold than outside Urban Areas. If the farm/facility is inside the urban area the activity will trigger faster.
L3, A2	Development of reservoirs with a capacity of more than 250m ³ .	Will still trigger if • The site is protected in terms of NEMPAA, • There is indigenous vegetation on the site, • Inside Urban Areas: zoned POS, • Inside Urban Areas: designated for conservation use in SDF or zoned for conservation purposes.

		If the activity takes place in an environmentally sensitive area which does not fall under the above, the removal of 300m² or more endangered or critically endangered indigenous vegetation will still trigger NEMA. Construction in a watercourse will trigger NEMA and the NWA.
L3, A3	Development of masts or towers used for telecommunication broadcasting or radio transmission purposes. Where the mast or tower: • Is placed on a site not previously used for this purpose or • Will exceed 15m in height.	Excluding attachments to existing buildings and masts on rooftops. Will trigger in: • Areas outside Urban Areas, • In Urban Areas: Areas designated for conservation in SDF, • In Urban Areas: zoned for conservation purpose, • In Urban Areas: zoned POS or equivalent. If any environmentally sensitive areas are not zoned for conservation or POS, and 300m² or more endangered or critically endangered indigenous vegetation is removed, NEMA will still trigger. Any development in watercourses will trigger NEMA and the NWA.
L3, A4	Development of roads wider than 4m with a reserve less than 13,5m	Will still trigger: • In areas zoned for POS or equivalent, • Outside Urban Areas: containing indigenous vegetation, • Outside Urban Areas: on the estuary side of the development setback line or in an estuarine functional zone if no setback line has been determined, • Inside Urban Areas: zoned for conservation, • Inside Urban Areas: designated for conservation in a SDF. Construction in watercourses will trigger NEMA and the NWA inside and outside Urban Areas. Removal of 300m² or more endangered or critically endangered indigenous vegetation will trigger NEMA.

L3, A6	Development of resorts, lodges, hotels, tourism or hospitality facilities that sleeps 15 people or more.	Will trigger: • Inside protected areas identified in terms of NEMPAA, • Outside Urban Areas: critical biodiversity areas identified in systematic biodiversity plans adopted by the competent authority, • Outside Urban Areas: within 5km from national parks, WHS, areas identified in terms of NEMPAA or from core of a biosphere reserve. Will trigger inside NEMPAA nature reserves If 300m² or more endangered or critically endangered indigenous vegetation is removed, NEMA will trigger inside and outside the urban area. If construction takes place in a watercourse, NEMA and NWA will be triggered.
L3, A10	Development and related operation of facilities or infrastructure for the storage, or storage and handling of dangerous goods (Note: the threshold for this trigger is between 30 and 80 cubic meters) i.e. a lot of fuel or other dangerous good.	Will trigger: • Areas zoned POS or equivalent, • Outside Urban Areas, • Inside Urban Areas: areas seawards of the development setback line, or within 200m of high-water mark of the sea if no such setback line is determined, • Inside Urban Areas: Areas on watercourse side of development setback, or within 100m of edge of watercourse where no setback has been determined. Could impact on nature reserves if they are not zoned POS or equivalent and the area to be cleared for the storage facilities are smaller than 300m² in size. If construction takes place in a watercourse NEMA and the NWA will trigger.

L3, A11	Development of tracks or routes for testing, recreational use or outdoor racing of motor powered vehicles.	Will trigger in: • Areas on the estuary side of the development setback, or in an estuarine functional zone where no setback line has been determined, • Seawards of the development setback line or within 200m of the high-water mark of the sea, if no setback line is determined, • Areas of indigenous vegetation outside Urban Areas. Development in environmentally sensitive areas, which requires the removal of 300m² or more endangered or critically endangered indigenous vegetation, will trigger NEMA. Any development in watercourses or the sea, seashore, littoral active zone which requires the infilling of, removal of or moving of material in these areas will trigger NEMA. Development in watercourses will trigger the NWA.
L3, A15	Transformation of land bigger than 1 000m ² to residential, retail, commercial, industrial or institutional use where the land was zoned open space, conservation or equivalently zoned on or after 2 August 2012.	This will trigger: • Outside Urban Areas, • Inside Urban Areas: Zoned for conservation or equivalent, • Inside Urban Areas: Protected in terms of NEMPAA, • Inside Urban Areas: Sensitive areas identified in an EMF. If there are environmentally sensitive areas which are not zoned for conservation (or equivalent), protected in terms of NEMPAA or identified as sensitive in the EMF, these sensitive areas would most likely be covered in indigenous vegetation or have watercourses which will trigger NEMA and/or the NWA.
L3:A16	Expansion of reservoirs where the capacity will be increased by more than 250m ³ .	This will trigger in: • Areas protected in terms of NEMPAA, • Areas containing indigenous vegetation, • Inside Urban Areas: Areas zoned as POS, • Inside Urban Areas: Areas designated for conservation use in SDF or zoned for conservation purposes, including residential areas.

		This activity will trigger more easily inside than outside the urban area. Could make it more difficult to construct reservoirs on properties now considered inside the urban area.
L3, A17	Expansion of a resort, lodge, hotel, tourism or hospitality facility.	Will trigger: • Inside areas protected in terms of NEMPAA, • Outside Urban Areas: Critical biodiversity areas identified in systematic biodiversity plans, • Outside Urban Areas: Within 5km of national parks, world heritage sites, areas identified in terms of NEMPAA or from core area of a biosphere reserve. The trigger for within 5km of national parks, WHS, biosphere reserves would not apply inside the Urban Area. However, environmentally sensitive areas covered in endangered or critically endangered indigenous vegetation or watercourses will still trigger NEMA due to removal of indigenous vegetation or construction in watercourses. Construction in watercourses will also trigger the NWA.
L3, A18	Widening of a road by more than 4m or lengthening of a road by more than 1km.	Will trigger if: • An area is zoned as POS or equivalent zoning, • Outside Urban Areas: containing indigenous vegetation, • Outside Urban Areas: on the estuary side of the development setback line or in an estuarine functional zone where no setback line has been determined, • Inside Urban Areas: Zoned for conservation, • Inside Urban Areas: designated for conservation in SDF This listed activity may not trigger inside an urban <u>area</u> if <u>indigenous vegetation</u> is removed but the removal of 300m² or more endangered or critically endangered indigenous vegetation will still be a trigger. Development in a watercourse will also trigger NEMA and the NWA.

L3, A21	Expansion of tracks or routes for the testing, recreational use or outdoor racing of motor powered vehicles.	Will trigger if: • Area is on estuary side of development setback line, or in an estuarine functional zone where no setback line exists, • Areas is seawards of the development setback line or within 200m from the high water mark of the sea if no setback line has been determined, • Outside Urban Areas: areas of indigenous vegetation. This activity may not trigger where indigenous vegetation is removed inside an urban area, but the removal of 300m² or more endangered or critically endangered indigenous vegetation will trigger NEMA. Construction in a watercourse will trigger NEMA and the NWA.
L3, A22	Expansion and related operation of facilities or infrastructure for the storage or storage and handling of dangerous goods.	Will trigger if: • Areas are zoned POS, conservation or equivalent, • Areas are outside Urban Areas, • Inside Urban Areas: areas seawards of the development setback line or within 200m of the high-water mark of the sea if no setback line exists, • Inside Urban Areas: areas on watercourse side of development setback line or within 100m of edge of watercourse where no setback line has been determined, • Inside Urban Areas: areas on estuary side of the development setback line or in an estuarine functional zone where no setback line has been determined. This activity will trigger in close proximity to watercourses inside Urban Areas. If 300m² or more endangered or critically endangered indigenous vegetation is removed, Listing Notice 3, Activity 12 will also trigger.

TECHNICAL ANNEXURE 5: GROUND WATER PROTECTION- POTENTIALLY CONTAMINATING ACTIVITIES

The highest level of risk is represented by the number 4, and the lowest level of risk is represented by the number 1 (Division of Drinking Water and Environmental Management, 1999 (California-based guidelines))

Table 3: List of Potentially Contaminating Activities

Source	Contaminants	Level of Risk
Commercial/industrial		
Automobile body shops/repair shops	Waste oils; solvents; acids; paints; automotive wastes, cutting oils	3
Car washes	Soaps; detergents; waxes; miscellaneous chemicals; hydro carbons	2
Gas stations/ sumps	Oils; solvents; miscellaneous wastes	4
Cement/ concrete plants	Diesel fuels; solvents; oils; miscellaneous wastes; salts; high pH	2
Chemical/ petroleum processing/ storage	Hazardous chemicals; solvents; hydrocarbons; heavy metals; asphalt	4
Dry cleaners	Solvents (perchloroethylene, petroleum solvents, Freon); spotting chemicals (trichloroethane, methylchloroform, ammonia peroxides, hydrochloric acid, rustremovers, amyl acetate)	4
Electrical/ electronic manufacturing	Cyanides; metal sludges; caustic (chromic acid); solvents; oils; alkalis; acids; paints and paint sludges; calcium fluoride sludges; methylene chloride; perchloroethylene; trichloroethane; acetone; methanol; toluene; PCB's	3
Fleet trucking/ trucking/ bus terminals	Waste oil; solvents; gasoline and diesel fuel from the vehicles and storage tanks; fuel oil; other motive waste	3
Food processing	Nitrates; salts; phosphorous; miscellaneous food wastes; chlorine; ammonia; ethylene glycol	2
Funeral services/ graveyards	Formaldehyde; wetting agents; fumigants; solvents; leachate;	2

	lawn and garden maintenance chemicals	
Hardware/ lumber/ parts store	Hazardous chemicals product; heating oil and forklift oils from storage tanks; wood-staining and treating products i.e. creosote; paints; thinners; lacquers; varnishes	2
Home manufacturing	Solvents; paints; glues and other adhesives; waste insulation; lacquers; tars; sealants; epoxy wastes; miscellaneous chemical wastes	3
Source	Contaminants	Level of Risk
Junk/ scraps/ salvage yard	Automotive wastes; PCB contaminated wastes; any wastes from businesses; and households; oils; lead pesticides for controlling mosquitoes, ants, ticks, moths and other pests; household hazardous wastes	3
Drinking water treatment plants	Treatment chemicals; pesticides	2
Fire stations	General building wastes; hydrocarbons from test burn areas	1
Golf courses	Fertilizers; herbicides; pesticides for controlling pests	2
Housing	<i>Household hazardous waste:</i> Household cleaners; oven cleaners; drain cleaners; toilet cleaners disinfectant; metal polishes; jewellery cleaners; shoe polishes; synthetic detergents; bleach; laundry soil and stain removers; spot removers dry cleaning fluids; solvents; lye or caustic soda; household pesticides; photo chemicals; printing ink; paints; varnishes; stains; dyes; wood; preservatives (creosote); paint and varnish removers and deglossers; paint brush cleaners; floor and furniture strippers <i>Mechanical repair and other maintenance products:</i> Automotive wastes; waste oils; diesel fuel; kerosene; heating oil; grease; degreasers for driveways; asphalt and roofing tar; tar	

	removers; lubricants; rusting proofing; car wash detergents; car waxes and polishes; rock salt; refrigerants <i>Lawn/ garden care</i> Fertilizers; herbicides and other pesticides used for lawn and garden maintenance (can be worsen by overwater) <i>Swimming pools:</i> Swimming pool maintenance chemicals <i>Urban runoff/ stormwater;</i> Gasoline; oil; other petroleum products; microbiological contaminant	

Source	Contaminants	Level of Risk
Landfills/dumps	Leachate; organic and inorganic chemical contaminants; waste from households and businesses; nitrates; oil; metals; solvents sludge	4
Motor pools	Automotive wastes; solvents; waste oils; hydrocarbons from storage tanks	2
Parks	Fertilizers; herbicides; insecticides; can bacteria; viruses; protozoa; TDS	2
Grazing animals, other animals and operations	Livestock sewage wastes; nitrates; phosphates; coliform and non-coliform bacteria; protozoa; viruses; TDS	3 (>5 animals/acre)
		2 (<5 animals/acre)
Dairies	Livestock sewage wastes; nitrates; TDS; salts; phosphates; potassium	2
Farm chemical distributor/application services	Pesticides; fertilisers; hydrocarbons from motor vehicles and storage tanks	3
Farm machinery repair	Automotive wastes; welding wastes	3
Irrigated crops	Pesticides; fertilizers; nitrates; phosphates; potassium)can be worsened due to over-watering)	2

Lagoons	Nitrates; livestock; sewage waters; salts; pesticides; fertilizers; bacteria	3
Non-irrigated crops	Pesticides; fertilizers; nitrates; phosphates; potassium	1
Pesticide/fertilizer/petroleum storages and transfer areas	Pesticides; fertilizers; nitrates; petroleum residues	3
Rural homesteads	<i>Machine shops:</i> Automotive wastes; welding wastes; solvents; metals; lubricants sludges <i>Septic systems:</i> Septage; coliform and non-coliform bacteria; viruses; nitrates; heavy metals; synthetic detergents; cooking and motor oils; bleach; pesticides; paints; paint thinners; photographic chemicals; swimming pools chemicals; septic tank/cesspool cleaners chemicals; elevated levels of chloride, sulphate, calcium, magnesium, potassium and phosphate	2
Sludge application to land	Organic and inorganic chemicals; coliform and non-coliform bacteria; viruses; protozoa	2
Agricultural drainage	Pesticides; fertilizers; TDS; TOC; nitrates	2
<i>Residential/Municipal</i>		
<i>Airports (maintenance/fuelling areas)</i>	Jet fuels; deicers; diesel fuel; chlorinated solvents; automotive wastes; heating oil; building wastes	4
Apartments and condominiums	Swimming pool chemicals; pesticides for lawn and garden maintenance and insect/rodent control; wastes from on-site sewage treatment plants; household hazardous wastes	1
Campgrounds/RV parks	Septage; gasoline; diesel fuel from boats	1

TECHNICAL ANNEXURE 6: METHODOLOGY AND DEFINITIONS FOR HUMAN SETTLEMENTS

Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
BNG/RDP Housing	BNG houses are developed with 100% of the cost covered by National grant funding (HSDG and USDG). Their built form is informed by National Housing Code.	R0 - R3 500	40m ²	R0 - R116 700	40	55 000	Freestanding; semi detached
Site and Service	Provides households with a plot of land and access to basic, essential services (water, sanitation, electricity, etc.). Funding by USDG. Built incrementally, thus no standardised built form.	R0 - R3 500	No standard built form.	R0 - R116 700	40	55 000	Free standing
		R3 501 - R7 000 (cannot apply for consolidation subsidy)		R116 700 - R250 000	80	180 000	Free standing

Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
Institutional Housing	This is a rent-to-buy approach which is developed through COCT's housing partners. Utilises both government subsidy and a loan from Cape Town Community Housing Company.	R1 501 - R7 000	No standard built form.	R84 000 - R240 000 (+R110 947 capital subsidy)	45	300 000	2 - 3 storey walk ups; free standing; semi detached
Social Housing	The programme utilises institutional and capital subsidies in terms of national housing programmes. Delivery occurs through Social Housing Institutions which develop and manage projects on the City's behalf.	R1 500 - R3 500 (30% - 70% of household allocation)	No standard built form.	Rental Units - does not apply	36		2 - 3 storey walk ups
		R3 501 - R15 000			36		2 - 3 storey walk ups

Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
GAP Housing	Capital subsidy provision for those who earn too much to qualify for a free house from the state, and who earn too little to qualify for a bond. No built environment specifications or restrictions	R3 501 - R22 000	No standard built form.	R233 400 - R483 500	58	290 000	2 - 3 storey walk ups; free standing; semi detached
Inclusionary Housing	Aimed at the inclusion of residents within the gap market through affordable units in new developments. Costs covered by developers or through FLISP subsidy. Yet to be legislated.	R3 501 - R18 000	No standard built form.	Rental Units - does not apply	N/A		

Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
Community Residential Units (CRU)	This housing programme is also aimed at households who earn less than R3,500 per month. CRU housing units are for rent and not for sale. This project is aimed at refurbishing inner city buildings and hostels.	R800 - R3 500	No standard built form.	Rental Units - does not apply			
Temporary Relocation Area (TRA) Housing	Sites developed in terms of the Emergency Housing Programme with access to shared basic municipal services. Costs are covered by HSDG for top structures and USDG for services.	N/A	9m ²	N/A	N/A		

Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
Incremental Development Area (IDA) Housing	Seeks to install basic services and secure a site for future implementation of top structures. Focus on speed of delivery, with funding through USDG.	N/A	No standard built form.	N/A	N/A		

Other Subsidy Instruments							
Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
Integrated Residential Development Programme	Provides for the acquisition of land, servicing of residential stands for low, middle and high income groups. The land use and income group mix will be based on local planning and needs assessment.	R0 - R3 500 (able-bodied persons)	40m ²	R160 573 (subsidy amount)			
		R0 - R3 500 (disabled persons)	40m ²	R160 573 (subsidy amount) plus disability variance			
		R3 501 - R7 000		N/A			
Informal Settlement Upgrading	This Programme is aimed at the in situ upgrading of informal settlements through the financing of serviced stands. Beneficiaries	R0 - R3 500	40m ²	N/A			

	may then apply for housing construction assistance through the other National Housing Programmes						
Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
Individual Subsidy Programme (FLISP)	This provides access to state assistance where qualifying households wish to acquire an existing house or a vacant serviced residential stand, linked to a house construction contract through an approved mortgage loan.	R3 501 - R22 000	No standard built form.	R27 960 – R121 626 (subsidy amount)			

Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
Consolidation Subsidy Programme	Provides for the completion of houses on the serviced sites. The developer being a municipality or a provincial department is responsible for the implementation of the consolidation project with the full participation of the beneficiaries.	R0 - R3 500		R109 947 (subsidy amount)			
Enhanced Extended Discount Benefit Scheme (EEDBS)	Focused on the transfer of pre-1994 housing stock and is intended to stimulate and facilitate the transfer of public housing stock to qualifying occupants.	N/A	No standard built form.	N/A			

6.1. New Housing Opportunities

In this district, whilst there are not numerous substantial tracts of undeveloped land suited to urban development, a number of opportunities are identified. These include sites which may be part of new subsidised housing projects on the 5-year housing plan, as well as sites that should be further investigated for publicly assisted housing projects. The table below effectively gives guidance to locating suitable land for urban development.

Table 4: Criteria to be used to guide the identification of land for subsidised and gap housing

Principle	Subcomponents
Contain urban sprawl and protect the urban edge	The land identified should: • contribute to the development of a more compact city; • maximise the use of existing infrastructure and service capacity; and • not be located adjacent to the urban edge (where possible).
Facilitate urban integration, and promote the establishment of viable communities	The land identified should: • be in close proximity to existing economic, social and public transport opportunities; and • support a mutually beneficial mix of social, residential, recreational, commercial and employment opportunities.
Facilitate a range of housing options and delivery approaches	The land identified should: • be suited to the development of new settlements, the upgrade and de-densification of existing informal settlements, high-density housing, rental accommodation, and the release of land to the homeless; and • note that the size of the housing project, and type of delivery agent influence its economic viability.
Be suited to Housing development	The identified land should: • encourage environmentally sustainable land development practices and processes; • not lead to the loss/have a damaging impact on natural and built assets that merit longer-term protection; and • ensure healthy, safe living conditions.
Take the beneficiaries' economic and	• When identifying land, and providing infrastructure and shelter for the un-housed and poorly housed, it is

Principle	Subcomponents
social wellbeing into account	important to take their livelihood strategies and social support networks into account.

6.2. Informal Settlement (In-Situ) Development and Upgrading

One of the key issues facing informal settlement upgrade is the issue of which settlements should be regarded as permanent, thus becoming the focus of upgrading beyond access to basic services (e.g. in situ upgrading) and which settlements or areas within settlements should be considered temporary and suited to relocation. In this regard, the City of Cape Town's Informal Settlements Department has initiated a process of 'categorisation of informal settlements' in terms of three types of settlement in order to inform the nature of intervention for each settlement (or portions thereof), including:

- **A** – occupation is permitted.
- **B** – occupation is only temporarily allowed because it is either demonstrably to the disadvantage of existing rights holders or it is very difficult or costly for services to be supplied.
- **C** – occupation is prohibited because it is hazardous to the residents or the wider community.

Informal settlement upgrading is identified by the National Department of Human Settlements as a key area of focus for human settlement development. The objective is to make these areas habitable and conducive to raising families. This means prioritising the provision of basic infrastructure, services and land tenure for informal settlement households.

The National Upgrading Support Programme (NUSP) provides technical support to municipalities for the development and implementation of upgrading programmes and plans (e.g. Upgrading of Informal Settlements Programme (UISP)). Capacity building and training of practitioners and community members was minimal but was a key part of the NUSP programme.

In assessing the feasibility of upgrading, many contributions from several organisations are required in terms of information, technical, human and financial resources. The support/upgrading is categorised in the following ways: The categorisation is proposed on the basis of a number of circumstances/features and each has associated proposals regarding possible intervention in light of those circumstances, as indicated in the table below.

Table 5: Criteria for categorisation of informal settlements upgrade/support

Category	Description	Intervention
A:	<i>Imminent Full Upgrading (Rapid Formalisation, full services)</i>	Formalisation consisting of full services, state-funded housing, formal tenure (e .g. title deeds), township establishment. May be conventional 'RDP' or densified housing solution
B1:	<i>Interim basic services (Provision of interim services leading to eventual formalisation)</i>	Commencing with comprehensive essential services package (e .g . water, sanitation, roads & footpaths, electricity, fire protection, waste removal key social facilities). Incremental tenure. People build own housing in the short term. May lead to formalisation or other permanent settlement solution
B2:	<i>Emergency basic services (Provision of emergency basic services BUT leading to eventual relocation)</i>	Commencing with emergency services package (e.g . water, sanitation, fire protection, solid waste removal). Eventual relocation
C:	<i>Rapid relocation to a site which is already available or imminently available</i>	Rapid relocation to a prepared site [i.e. greenfields housing project, temporary relocation area (TRA), site and service (serviced land release)]

TECHNICAL ANNEXURE 7: METHODOLOGY FOR TRANSPORT ROUTE DESIGNATIONS

7.1. The Categorization of Transport Infrastructure in the District Spatial Development Frameworks: An Outline Method

7.1.1. Understanding Accessibility and Land Use in the City

The relationship between land use and accessibility is a fundamental informant to urban development. Higher levels of urban intensity and density generally support higher levels of urban opportunities, and also urban efficiencies. In turn, areas of highest accessibility to urban opportunities should be those of highest urban intensity and density.

Transport infrastructure is key to supporting accessibility to opportunities, but also dependent on sufficient development thresholds for efficiency, and is therefore central to the relationship between land use and accessibility.

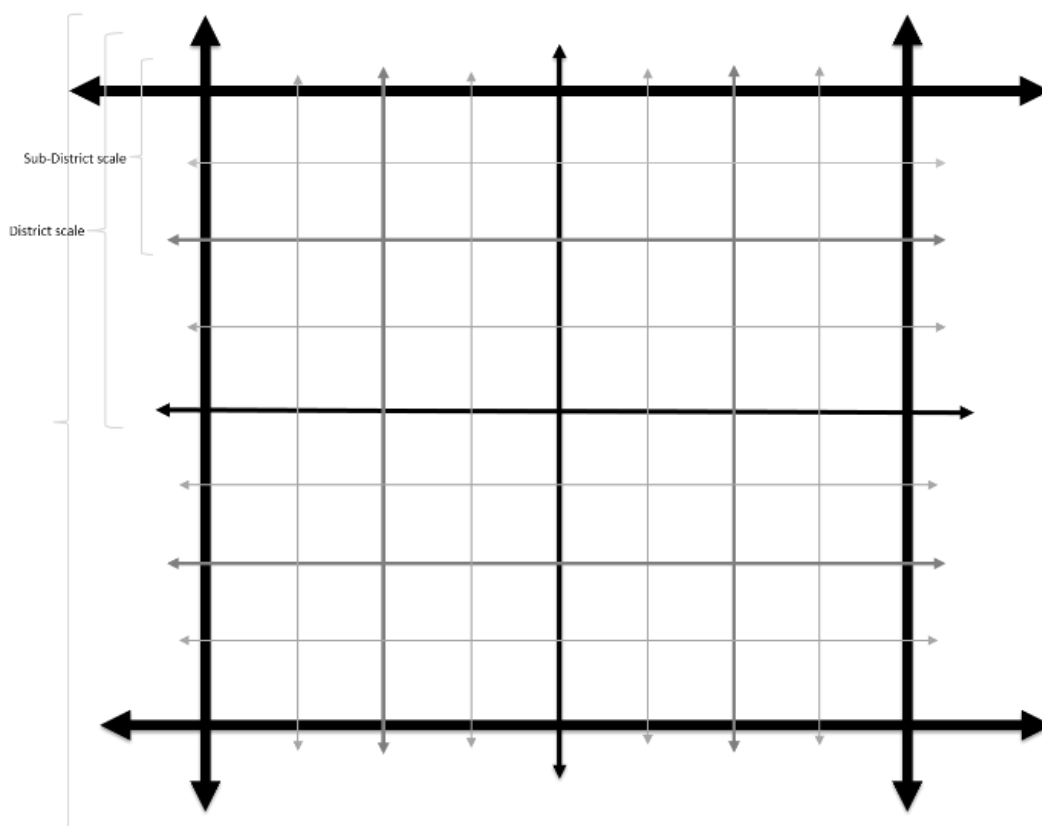


Figure 3: The Basic Accessibility Grid

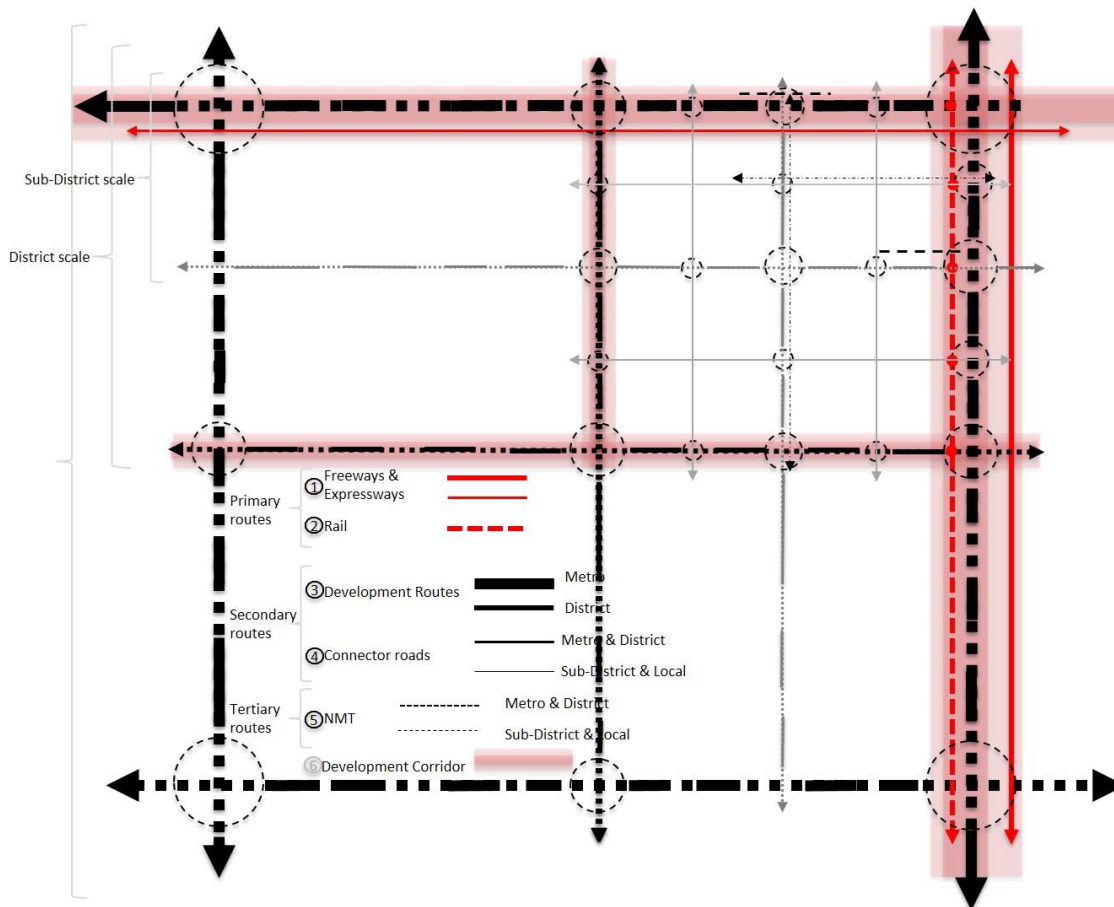


Figure 4: The comprehensive City Accessibility

The mix of mobility and accessibility infrastructure based on:

- Non-motorised transport (NMT) within and between neighbourhoods.
- High frequency and volume public-transport-orientated mobility along development routes and railways, made cost-effective by high intensity development thresholds,
- Higher mobility connectors linking more peripheral urban areas and nodes, and
- High mobility freeways linking from within the district to other parts of the city and neighbouring towns and regions.

The key objectives of an optimal movement system should be:

- Optimising the relationship between movement and development.
- Making a more 'walkable city'.
- Ensuring all roads, excepting freeways, are as much for people as they are for vehicles (re- movement and safety).
- Reducing average household transport costs.
- Reducing the city's overall carbon footprint.
- Optimising development and movement opportunities.

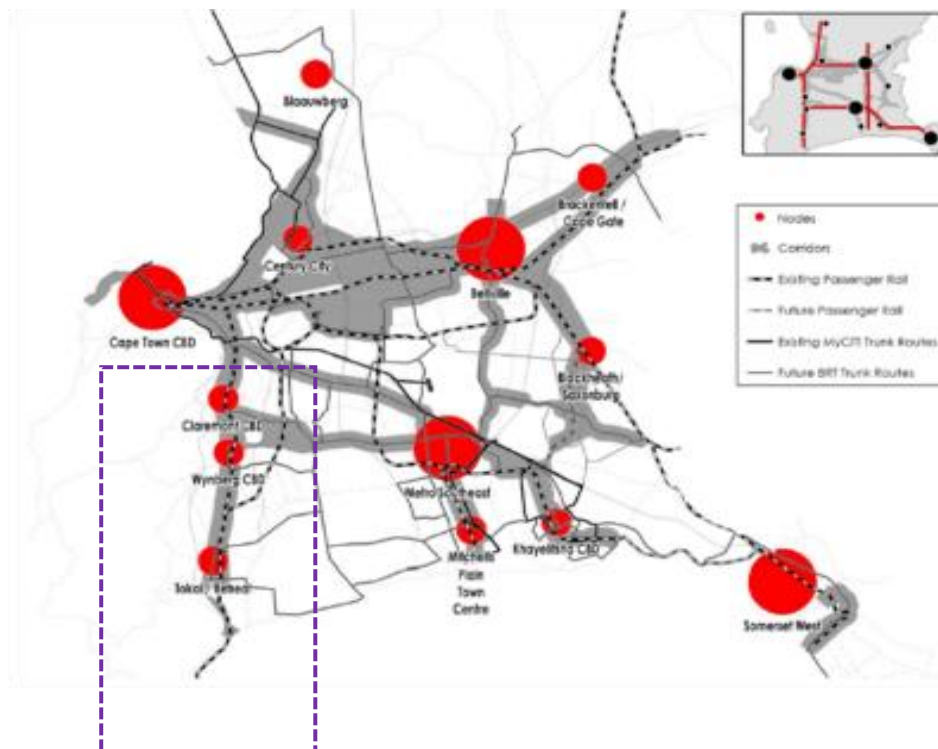


Figure 5: Cape Town's Accessibility Grid (as per CTMSDF, 2018)

7.1.2. The District SDF Route Categorisation: The Rationale

The following broad route categorisation hierarchy is drawn from the CTMSDF (2018), but interpreted in terms of applicability and appropriateness for the reviewed district level Spatial Development Frameworks.

- A. Primary Routes (although arguably Secondary routes associated with the supporting Secondary Accessibility Grid):
1. **Freeways (inclusive of Expressways):** Urban freeways fulfill an exclusive mobility function, and do not permit direct access to abutting land uses. The high connectivity provided by direct freeway/expressway connections tends to attract manufacturing, warehousing, major retail and industrial land uses. These opportunities tend to be realised around key intersections/off ramps and on roads running parallel or linked to urban freeways.
 2. **Rail:** Rail provides (should provide) a high-performance, high-volume and safe public transport service, which will be the preferred mode of choice of long-distance commuters. Conceptually, this service should be provided at 8-16km intervals on a city wide to district level - forming part of the *Primary* tier of the accessibility grid

The rail network provides for mobility over longer trip distances. The hierarchy of stations supporting the rail service are primary points of accessibility, particularly when associated with areas of high road based accessibility, and can generally support intense concentrations of activity and medium – high land use densities.

- B. Secondary Routes (although arguably Primary routes associated with the Primary Accessibility Grid):

3. **Development Routes:** These are characterised by development immediately adjacent to 'main' roads which is medium to high intensity mixed use through urban nodes and medium to high density residential in-between these urban nodes. Associated with this higher intensity / density development is high frequency public transport provision. These roads are also generally characterised by direct access and interrupted movement flows, especially at bus and taxi stops, traffic lights, and in CBD areas where development, pedestrian and vehicle intensity is high and the need for access across roads is high.

These are differentiated by higher order (or metro-scale) and lower order (district-scale) routes:

- Higher order (metro-scale) development routes are associated with higher development intensities and densities on properties abutting (or very close to) primary main roads with high frequency and volume public transport (generally associated with IRT trunk routes – including rail). These routes link metro-significant (or major district) urban node (urban opportunity) areas.
- Lower order (district-scale) development routes are associated with lower development intensities and densities abutting (or very close to) lesser main roads with high frequency but lower volume public transport (generally associated with IRT feeder / bus or taxi routes). These routes generally link district significant urban nodes into metro-significant urban nodes and development routes and corridors.

4. **Connector Routes:** The primary role of these roads is to connect outlying urban nodes and surrounding areas in the district to major opportunity areas (i.e. major urban nodes and development corridors). They have a greater mobility function than development corridor main roads. They generally accommodate differing accessibility and mobility functions along their route, but their role in accommodating high accessibility is generally focused at nodal areas (or in more outlying areas 'villages'). Direct access to abutting land uses and residential properties is not otherwise encouraged along connector routes, but is provided for existing properties abutting these roads that have no other access option. These are primarily private and freight movement routes, and includes most scenic routes (as they link through mountains, along the coast etc.). Although not generally primary public transport routes, they may include public transport, particularly in outlying areas where there are no development corridor main roads.

These are differentiated by higher order (or metro-scale) and lower order (district-scale) routes:

- Higher order (metro-scale) connector routes are generally principal (usually longer) roads connecting many places across the district and into other districts. They are generally associated with comparatively high volumes of faster-moving traffic (although this may vary considerably across a variety of different road types in different areas) connecting dispersed (often remote) areas of urban concentration / intensity (i.e. urban nodes) along the route. These are usually associated with some (although) limited public transport.

- Lower order (district-scale) connector routes are generally less significant (usually shorter) roads connecting (usually fewer) places within the district. Although often also associated with comparatively high volumes of traffic this is usually at lower speeds and giving access to local neighborhoods', although this too may vary considerably across a variety of different road types in different areas. These may also include some (although) limited public transport.

C. Tertiary Routes:

5. **NMT:** This comprises a range of non-motorized routes of varying function, nature, and significance. This includes all road verges and pavements (excepting along freeways, expressways and railways), paths and trails through open space and nature areas, and major destination place promenades within the district. However, this should generally be prioritized along public transport routes and around public transport stops, stations and interchanges to facilitate safe and convenient access to public transport services, forming a connected network – and effectively comprising the 'tertiary tier' of the accessibility grid. Walkability, and non-motorized bikes (excepting small cc electric) should be an increasingly key focus of the manner in which development and movement is planned and occurs in the district.

D. Quaternary Infrastructure:

6. **Broadband Fibre:** This should be provided (as part of transport infrastructure) within development corridors (as defined by area / extent) as priority areas as a strong informant to reducing the need for transport (movement of people) and supporting /increasing economic opportunity in all prioritised urban development areas of the city / district.

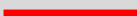
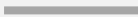
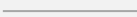
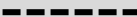
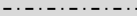
E. Development Corridors:

7. **Development corridors** are wide areas of (where) higher-intensity urban development (is focussed) on either side of development routes (than in surrounding urban areas further away from these routes). They are characterised by a dynamic, mutually supporting relationship between land use and the movement system. Development corridors are generally supported by a hierarchy of transport services that function as an integrated system to facilitate ease of movement for private and public transport users. Corridor development is focused predominantly on routes serviced by mass rapid public transport services (i.e. rail or bus rapid transport (BRT) trunks). However, the routes may serve different functions, with some routes combining route functionality in terms of accessibility and mobility. The concentration of intense bands of high-intensity urban development reduces overall trip lengths and improves access to opportunities, offering a means of conveniently integrating communities with service provision, and fulfilling a range of economic and social needs.
These are, aligned with the differentiation of development routes, differentiated by higher order (or metro-scale) and lower order (district-scale) development corridors:

- Higher order (metro-scale) development corridors are associated with higher order development routes (i.e. with higher development intensities and densities, and high frequency and volume public transport), but also wider urban areas of primarily higher density residential development which usually include within (or close to) them other complementary and supporting movement routes (e.g. rail, connector routes, and/or freeways).
- Lower order (district-scale) development corridors are associated with lower order development routes (i.e. with lower development intensities and densities, and high frequency but lower volume public transport), but fairly narrow urban areas of usually exclusively medium density residential development (on either side of the development route) which are not associated with any additional complementary and supporting movement routes.

The above can be summarised as follows:

Table 6: Transport designations and symbology

	SDF Route Categories & Designations	Sub-categories	Indicated on District map	Indicated on Sub-District maps only
A	Primary routes			
1	Freeways (& Expressways)	Freeways		
2	Rail (& stations)			
B	Secondary routes			
3	Development Routes	High order (metro scale)		
		Low order (district scale)		
4	Connector Routes	High and low order (metro & district scale)		
		Sub-district & local scale		
C	Tertiary routes			
5	NMT	Metro & district-scale		
		Sub-district & local scale		
D	Quaternary	<i>IT/WiFi cabling</i>		
E	Development corridors	High order (metro scale)		
		Low order (district scale)		

Transport infrastructure is reflected indicating selected elements of the district-wide movement system. In alignment with the CTMSDF, the District Spatial Development Frameworks (SDFs) utilise a route designation indicating land use functionality that will encourage an appropriate level of development and more intense land uses to locate on, or adjacent to, the (primary) accessibility grid. This will contribute towards establishing the thresholds required for sustainable and cost effective public transport. It is important to note that opportunities along routes can also be linked to parallel streets and side roads. Furthermore, routes exhibit different characters with respect to land use mix and density along their length. District development guidelines should thus be read along with sub-district guidelines and local plans and policies where applicable and not necessarily be interpreted in a blanket manner for the length of the route.

The route designation reflected does not replace the City's Hierarchical Road Network Classification system, nor is it intended to run in parallel as a duplicate classification system. Annexure A (still to be agreed on for inclusion) describes the relationship between the CTMSDF / district SDF route designations and DoT, the PSDF and the City's hierarchical road classification network.

7.1.3 Notes Regarding the District SDF Route Map Designations

Importantly, the following applies in the designations as mapped. This is to minimise the complexity of maps, as well as unnecessary duplication (of information already provided elsewhere).

1. The District SDF (as does the CTMSDF) utilises a transport route designation relating to desired land use functionality. No distinction is therefore made between existing and emerging routes in the main district SDF and sub-district maps. This distinction is made and provided in the implementation section of the SDF which identifies future planning and development priorities, and is indicated on an Urban Restructuring map.
2. Road based public transport services and routes (eg. BRT trunk and feeder routes and taxis) are not designated on the SDF maps*. However, public transport, and its frequency and capacity, should align closely with development routes (and the associated development corridors) as well as other important routes (eg. main connectors).
 - * Public transport routes are mapped in the Integrated Public Transport Network Plan (IPTN).
3. The distinction between Metro and District Development Routes on the maps is made by the extent of the associated designated development corridor widths (800m development corridor widths for Metro development routes and 400m for District development routes).
4. The width of District Development Corridors is designated only on the SDF sub-district maps.
5. Scenic routes are indicated separately (only) on the SDF sub-district maps. All scenic routes (with one or two notable exceptions: e.g. the M5 'blue route') are connector routes.

TECHNICAL ANNEXURE 8: METHODOLOGY TOWARDS DESIGNATION OF NODAL HIERARCHY AND TYPOLOGIES

8.1. Methodology Towards Designation Of Nodal Hierarchy And Typologies In The District SDF

8.1.1. Introduction

The purpose of this document is to provide guidelines on the methodology to be followed for nodal designations in the District SDF review process. Nodes are categorised based on scale, function and the role it plays in the local, district and wider metropolitan context.

8.1.2. Definition of a node

Nodes can be defined as a **clustering of higher intensity** (i.e. diversity and density) land uses that are located and **concentrated** at points of maximum accessibility (either through public and/or private transport), exposure, convenience and opportunity. The role and function that a node fulfils in terms of its local/district/metropolitan context would determine the designation in terms of its hierarchy/scale.

Emerging nodes would refer to the above definition of concentration points that are still in the process of being developed. Development guidelines should support the growth of such nodes.

The principle of clustering of civic facilities underpins the nodal approach and creates opportunities for facility multi-use and sharing and that should result in land savings and trip reduction and other efficiencies. These nodal/clustered areas where such facilities are grouped/clustered and serve the people living in the service catchment area it would be classified as a **civic cluster** in the District Plan.

8.1.3. Background

During the past 5 years various pieces of existing work around the categorization and classification of nodes have either been undertaken and/or reviewed. The section below will highlight existing work that has been used as the basis moving forward with the categorization and demarcation of nodal areas to be incorporated into the District Plan review process.

8.2. Spatial Development Framework

8.2.1. Municipal Spatial Development Framework

The 2018 MSDF have categorized various nodes at different scales, as stated below:

Metropolitan and sub-metropolitan nodes

- Aim is to focus concentrated intensification at points of very high/ high accessibility, exposure, convenience and urban opportunity (typically along your accessibility and activity routes)
- Support and encourage a very high/ high intensity, mix and clustering of urban activities or land uses (wider variety of land uses and higher densities). Serves a broad spectrum of citizens and businesses

District and local nodes

- Aim is to focus concentrated intensification at points of high accessibility, exposure, convenience and urban opportunity
- Support and encourage medium to high intensity, mix and clustering of urban activities or land uses.
- Service area more geared towards the communities within the district as well as much more localised services within walking distance from citizens using the services.

8.2.2. District Plan 2012

The 2012 DP identified various “nodal” type classifications. These included different scales of urban nodes (metropolitan, sub-metropolitan, district, local & neighbourhood), transit station typologies (metropolitan, major urban, employment, urban neighbourhood, neighbourhood & coastal), civic precincts and destination places. All of these had a certain level of clustering of different land uses at different scales. The extracts below indicate how these “nodal” typologies were categorized as well as the definitions linked thereto.

a) Urban nodes

Urban nodes are characterised by the intensity, mix and clustering of activities or land uses (including commercial/ business development and associated employment opportunities, higher-order services and higher residential densities) at points of maximum accessibility, exposure, convenience and urban opportunity. The generative capacity of an urban node is generally a function of the mix of land uses that it supports and its position in the accessibility grid (see Table 3.1). The role and function of urban nodes is differentiated in terms of scale (metropolitan, sub-metropolitan, district, local) based upon its structural position within the accessibility grid, and the intensity and mix of land uses it supports. Urban nodes are identified as areas for further land use intensification,

clustering and reinforcing economic land uses, public services and high-density residential development.

Table 7: Alignment and hierarchy of the accessibility grid and areas of intensification

Accessibilty grid	Span	Associated nodal development	Scale of operation	Areas of land use intensification
Primary	8 – 16 km	Metropolitan node	Citywide	Corridor/strip development/urban nodes
Primary	4 – 8 km	Sub-metropolitan node	Sub-metropolitan	Corridor/strip development/urban nodes
Secondary	2 – 4 km	District node	Inter-district significance	Strip development/urban nodes
Tertiary	1 – 2 km	Local nodes	Inter suburb	Usually urban nodes
Quaternary	0,5 – 1 km	Neighbourhood centre	Suburb	Usually nodal

Other forms of intensification of development, on the accessibility grid (development routes, activity routes and streets) could be encouraged in a locally appropriate manner including:

- **Industrial areas** where the changing of their nature is supported by the District plan;
- Particular **business complexes** that are on the accessibility grid (development and activity routes / streets);

Areas associated with **transit stations (system of rail stations and the IRT trunk stations)** especially those, which are a component of identified urban nodes. With regard to these areas, a typology of opportunities is proposed which considers the transport and land use role of the transit stations (rail and IRT trunk stations) and associated areas (comfortable walking distance from the station) in the broader urban system (see table below). Transit station areas that are associated with urban nodes as well as associated significant foot movement (based on their role in the transit system) are generally more likely to support more intense mixed use environments.

b) Transit station area

Refers to the areas that support transit (public transport) stations (including rail stations and trunk, road based IRT stations). These supportive areas are conceptually defined in the District Plan, but are generally within comfortable walking distance of these stations (i.e. +/- 800m). Transit stations are categorised in the District Plan (e.g. neighbourhood station / urban station), which provides an informant to potential development opportunities / desired land use mix in the supportive areas and which should be further defined and detailed at the local area level.

Table 8: Transit (Rail and IRT trunk) station precinct typology

Transit station area typology	Land use character / role	Intermodal connectivity	Structural urban position	Example station
Metropolitan station	High intensity land use mix (office, residential, commercial, civic and government)	Major intermodal connectivity and destinations	Generally associated with metropolitan urban node	Cape Town station
Major urban station	Mix of office, retail, residential, commercial and public uses	Major intermodal connectivity	Generally associated with sub-metropolitan/ district urban node	Wynberg station
Employment station	Specific industrial/ commercial uses and destination	Limited intermodal connectivity	Generally associated with general industrial area	Blackheath station
Urban neighbourhood station	Local centre of activity, live, work, shop	Transit feeder station with parking	Generally associated with local urban node	Rondebosch station
Neighbourhood station	Primarily residential function	Local transit feeder station with limited parking	Likely to reflect embedded position in urban fabric	Hartfield station
Coastal station	Coastal amenity with surrounding residential/ tourism/ restaurant orientation	Limited intermodal connectivity	Generally outlying areas with minor urban catchments	St James station

c) Civic precincts

Social facilities and public institutions should be clustered in civic precincts, at the points of highest accessibility (the intersections of the grid). The hierarchy of the civic precincts will be determined by the hierarchy of the accessibility grid. The civic precincts that are of citywide significance will by and large be located at the intersection of the primary grid, such as Bellville. The civic precinct will be the focus of public investment, and will create opportunity for private-sector investment in commercial, mixed-use and higher-density residential development. They will therefore be closely associated with urban nodes.

d) Destination places

A destination place is a node, landmark or location that forms a significant point or area of attraction, and is part of the identity of Cape Town and the district. High-order destinations are those that every resident and visitor should visit at least once, while, at a local level, destinations include public spaces, such as squares, parks and sports facilities.

e) Community facilities

Community Services & Health Infrastructure Plan (CSHIP)

The CSHIP is an infrastructure and investment plan that focus on the best use of limited resources. The plan guides high-level decision making in terms of the provision and optimization of social infrastructure as well as a multi-year budget linked to this implementation. The plan is informed by a detailed assessment of existing facilities and services provided in order to identify the gaps that need to be addressed. Furthermore, a consistent and clear set of criteria has been utilized to identify, profile and prioritise precincts and clusters of facilities. Precincts have been ranked based on highest level of priority from a Community Services & Health perspective, the highest priorities from the perspective of City strategic alignment, as well as the highest ranked precinct in terms of the combined/overall. This provides a clear indication of which specific facilities are required and specifics on how they are aligned to City strategy. There are twenty-four precincts in total and although there are precincts priorities in all areas, the Central (8) and East(6) Areas have the highest number of precincts identified.

Table 9: Community services and health precincts per area

	Area 1: North	Area 2: East	Area 3: Central	Area 4: South
Backlog	Atlantis (19) Du Noon (15) Hout Bay (13) Wallacedene (4)	Enkanini (8) Khayelitsha Site B (11) Khayelitsha Site C (2) Mfuleni (5) Nomzamo (11)	Manenberg (18) Nyanga/Gugulethu (6) Hannover Park (14) Elsies river/ Bishop Lavis (10) Delft (7) Blue Downs (3) Belhar (12)	Phillippi (9) Seawinds (16) Pelican Park (17)
Optimisation		Khayelitsha CBD	Bellville	Mitchells Plain Town TC Claremont CBD Wynberg CB

8.3. Facilities 2040 Research and Modelling (Conducted Through CSIR)

To provide an effective distribution network for a range of social facilities and services it is important that facilities are clustered at accessible locations. Facilities have a range of threshold levels, which increase with their level of specialisation. For example, facilities frequented on a daily basis have a lower threshold than those used less frequently. Simply put, this means that the more specialised a service or facility is, the fewer of those there may be and the longer people should expect to travel to access that service. Ideally, the hierarchical nature of social service delivery should relate to a hierarchy of social facility delivery centres.

Establishing such a hierarchy assists in allocating facilities of various types to their most appropriate locations based on the required access distances, facility threshold and the appropriate number of people required for service efficiency within the service catchment area of that facility. To operate viably, facilities with large thresholds, such as stadia, require a larger number of people within their service catchment area or reach than, for example, a library or, even at a lower level, a primary school.

The Community Services and Health Directorate developed a node based approach to identify social facility civic clusters in order to drive the precinct planning strategic approach and guide City investment.

For the purposes of community services, a node/civic cluster is defined as an area of clustered services that are referred to as civic clusters. The section below highlights the methodology and approach that was used to identify the hierarchy of nodes.

- Approach followed is NSDF Town hierarchy and its service wheel – adapt to align to City of Cape Town
- Propose a social facility distribution framework which would include:
 - Backlogs of facilities
 - 2040 population projections and estimated future facility needs
 - Quantify and identification of land (including optimisation)
 - Nodal hierarchy and spatial locations
 - Prioritised interventions per sector and node level
- Include the following services: Education, Primary health and Hospitals, Sport and recreation(municipal, open space and active recreation space), Libraries, Halls and multi-purpose centres, Government services(Labour, Justice, Social Services, Home Affairs, SASSA, SAPS), City service points(housing, environmental health, cash offices, etc.)

135 civic clusters were identified and ranked into five categories/levels (a cumulative and linked hierarchy of nodes). As illustrated in Figure 6 below based on the intensity of the differential role of each node in the city, service catchment population size, range & type of facilities available and an equitable spatial spread of civic clusters at different levels across the city that is required to support efficient and a spatially just distribution of different facility types at acceptable distances.

These nodes should be used to guide the location of new facilities in the City of Cape Town; both for addressing current requirements relative to the standards and for serving new areas of residential development

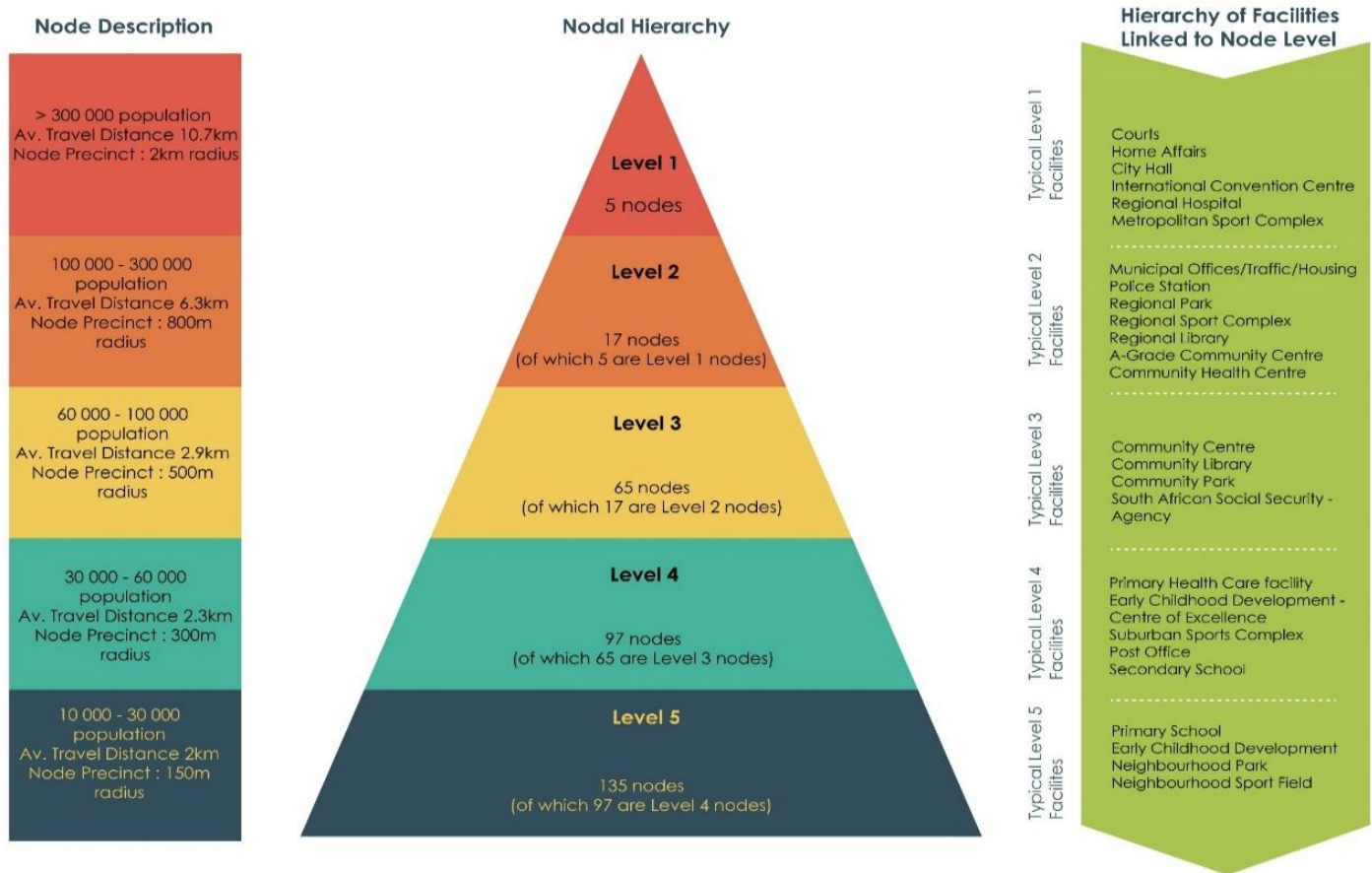


Figure 6: Facilities nodal description and hierarchy

Table 10: Community Services within nodal hierarchy

Scale	City wide (Regional)	Level 1 (Regional)	Level 2 (Regional)	Level 3 (Community)	Level 4 (Neighbourhood)	Level 5 (Neighbourhood)
Catchment		15 – 25km	10 – 15km	5 - 10km	2 – 5km	0.1 – 2km
Population		>300 000	100 000 – 300 000	70 000 – 90 000	30 000 – 60 000	10 000 – 30 000
Cluster radius		2km	800m	500m	300m	150m
Services	✓ City Hall ✓ International sports venue ✓ International conference centre ✓ High court ✓ City headquarters ✓ Tertiary hospital(L3) ✓ Prov & Nat Gvmnt offices (Head offices) ✓ University ✓ Reference Library	✓ Major public venue ✓ Grade A community hall ✓ Regional hospital(L2) ✓ Regional library ✓ Sub-metro/ Regional sport complex/Stadia ✓ Regional Park ✓ Municipal offices ✓ Traffic Dept. ✓ Home Affairs/Other gvmnt inst. Reg Office	OPTIONAL for larger L2 nodes <350 000 people; selected L1 services to be provided ✓ Tertiary institution (not university)i.e. EFT ✓ Fire station ✓ District sport complex ✓ Civic centre/Community Hall ✓ SASSA office ✓ District hospital(L1) ✓ Municipal billing points ✓ Env Health offices ✓ Regional library	✓ Community Hall ✓ Local library ✓ Community Hall/CDC ✓ Home for the aged ✓ Sports complex – district ✓ District Park ✓ Children's home ✓ Police station	✓ ECD – centre of excellence hubs ✓ Primary health clinic ✓ Post office ✓ Suburban sports complex ✓ Secondary school ✓ Community Park	✓ ECD – Local crèche ✓ Neighbourhood sport field ✓ Neighbourhood Park ✓ Primary school

8.4. Transport

8.4.1. Transit Oriented Development

The Strategic Transit Oriented Development Framework have gone through detailed and iterative process, which identified a set of Transport Accessible Precincts (TAPs). These are spatially defined zones used to measure the performance of the Transit Oriented Development Comprehensive model outputs (or in this context the 'individual'). The precincts are confined to a 500m radius from a higher order public transport station. They were identified based on their level of access to the transit network. The aim is for these TAPs to become the primary anchor for strategic intervention to ensure sustainable forms of development in close proximity to transit. Further to this the framework acknowledge that TOD has different meanings and requirements dependant on the intensity, scale and type of land uses that existing or is envisaged. Thus different interventions were proposed at different scales of planning.

Metropolitan

- ✓ The aim is to optimise travel patterns in such a way that it meets a set of predefined indicators
- ✓ Development of land produces and attracts trips with varying characteristics depending on the type and location of the land use.
- ✓ TOD at the metropolitan scale spatially distribute optimum land uses to ideal locations at the ideal time to optimise city wide travel patterns toward long term efficiency and sustainability.

Corridor

- ✓ Focus must be on land development to promote bi-directional flow of trips and the financial sustainability of trunk public transport services whilst playing a role in achieving the metro scale balancing mentioned above.
- ✓ Integrated transport and land use planning should give context to local area and precinct planning initiatives.
- ✓ Promote land development along selected transit corridors, where the combination of transport investment and development would optimise the utilisation of transport.

Nodal / Precinct / Projects

- ✓ TOD principles can be applied to facilitate better interfaces between the transport systems, land developments and people.
- ✓ Allocation of space should be done in a manner that would create more opportunities for walking and cycling and greater use of public spaces through using urban design to create a sense of place.

Station precinct typologies

The implementation of the framework included categorizing stations into a hierarchy, ranging from low to high development potential. This categorisation informed the classification of stations into two main typologies namely “Major TOD station precinct” and “TOD station precinct” with remaining being classified as station/stops.

Major TOD station precinct

A major TOD station precinct typically occurs in relation to a modal interchange characterised by high boarding/alighting passenger volumes due to the interchange with significant north/south routes or alternative public transport modes, and proximity to trip attracting land uses. In some instances, Left Only Boarding (LOB) facilities may be provided on the opposite side of the intersection and are linked with pedestrian crossings. The urban environment generally includes high levels of accessibility, a concentrated mix of non-residential land uses, high density existing/potential residential developments and significant development potential.

TOD station precinct

A TOD station precinct typically includes a closed median station with two platforms and high transfer/boarding/alighting passenger volumes. The surrounding urban environment offers some development potential; however, this is constrained by established existing development, limited vacant land and/or perceived lower property demand.

Public Transport Zones

PT zones have been approved as an overlay zone in the Dev Man Scheme. They have been divided into 2 zones namely PT1 and PT2. The demarcation of these went through a rigorous process of analysis and categorization of:

- ✓ availability of public transport or areas in which public transport improvements are promoted;
- ✓ existing operational quality of public transport (in terms of frequency and capacity);
- ✓ the level of service (quality) experienced at stations and at precinct level;
- ✓ and the socio-economic characteristics of the surrounding area.

‘PT1 areas’ refers to areas where the use of public transport is promoted, but where the City considers the **provision of public transport inadequate** or where the use of motor vehicles is limited.

‘PT2 areas’ refers to areas where the use of public transport is promoted and the City considers the **provision of public transport good**, or where the use of motor vehicles is very limited.

The intention is to offer reduced off-street parking requirements in areas already well-served by public transport, in order to encourage the reduction in the number of private

transport trips generated to and from that area, as well as to encourage the intensification of land development on the relevant erven. The data for the GABS, MBTs, and MyCiTi feeder routes was combined with the trunk services data (normalised, so that rail would not “overwhelm” the other data), to present a composite picture of public transport activity. It shows a strong correlation between the existing PT zones, and the composite PT activity.

It was noted that all of the zones are located in areas targeted for investment: 83% in the Urban Inner Core (of which 64% is located along corridors and in nodes identified in the MSDF), and 17% in the Consolidation Zone.

8.5. Summary of existing categories and typologies

The two tables below are summaries of the current guidelines which are found in the following documents:

- 2018 Municipal Spatial Development Framework
- 2012 District Spatial Plans
- 2040 facilities research and modelling (CSIR)

This information has been used to confirm the designations of different classification of nodes/precincts.

Table 11: Scale/ Hierarchy of Nodes

SCALE/HIERARCHY of NODES							
	CATCHMENT AREA		NODAL RADIUS			TRANSIT (DP)	
SOURCE	CSIR	DP	MSDF	CSIR	TOD	Category	Catchment (km)
METRO	15 – 25km	8- 16km	800m – 2km	1.5km		Metro station	8 – 16km
SUB-METRO		4-8km				Major Urban station	4 – 8km
DISTRICT	10-15km	2-4km		800m		Major Urban station	2 – 4km
LOCAL	5–10km	1-2km		500m	400m	Urban neighbour-hood station	1 – 2km
NEIGHBOUR-HOOD	<5km	<1km		300m		Feeder with limited parking	0.5– 1km

Table 12: Existing Typologies of Nodes/ Precinct Areas

EXISTING TYPOLOGIES OF NODES/PRECINCT AREAS	
TYPE	CHARACTERISTICS
MIXED USE	✓ Concentration of different residential and non-residential land uses ✓ Horizontal and / or vertical integration of uses ✓ Intensity and density of uses vary according to the location ✓ Around or in close proximity of highly accessible public transport facilities ✓ Characteristic for nodal and/or strip-development along high accessibility routes
INDUSTRIAL	✓ Pre-dominant land use is Industrial ✓ Small scale retail activities that support the industries ✓ Close proximity to public transport and high level of accessible (also known as an Employment station in 2012 DP)
CIVIC PRECINCT	✓ Clustering of social facilities on its own or in mixed land use context ✓ Scale, function and role of social facilities determine the level of the precinct ✓ Higher order facilities in close proximity of highly accessible public transport
DESTINATION PLACE including COASTAL NODES	✓ Landmark or location with significant level of attraction ✓ Unique identity (public places, squares, parks) ✓ Mostly linked to tourism and recreation ✓ Nature, heritage, Coastal and Cultural typologies ✓ Coastal areas will include nodal areas where development is encouraged ✓ Coastal amenity with surrounding res/tourism/hospitality)

The next section of the document will provide details pertaining to the informants to the designations as well as the proposed scales/hierarchies and typologies to be used in the reviewed District Plan.

8.6. Informants

Section 6.2 of the MSDF highlights the need for the confirmation of the designation and extent of district and local nodes. Taking cognizance of the fact that nodes can be located at various scales there are a few key informants that should be considered when identifying nodal areas.

8.6.1. Existing nodes

- Assess the existing nodes identified in the 2012 DP and 2018 MSDF in terms of the following criteria:
 - Is all information for the specific nodes still relevant?
 - Role and function of the node
 - Performance in terms of existing designation:
 - Medium – High performance: How to maintain/support??
 - Low performance: Required changes needed/function changed???
 - Confirm/amend the nodal designation
 - STA delineation – where City will invest (growth points)

8.6.2. Accessibility

- Focussed areas at highly accessible locations with multi-modal transport modes (around PTIs, existing rail stations) with potential for land use intensification; PT1 & PT2 zones where there are already incentives for parking provision.
- In close proximity to, along or adjacent to high accessibility and activity routes (walkability: approximately 800m – 1km).
- Future public investment(known) BRT, station upgrades and new/upgraded rail and existing facilities (GAB & taxi's)

8.6.3. Economic potential

- Existing mixed land use locations with potential for land use intensification
- Identified high accessibility areas(PTI/routes) with the potential for redevelopment/infill (close to lower income communities??)
- Located in the UIC where investment is prioritised (existing corridors, integration zones, etc.)
- Future public investment (known) – BRT & rail, housing, infrastructure, commercial/retail
- Current delivery rates: where is the market currently delivering, and how much?
- Demand? Is there specific private sector momentum building within/in support of certain nodes? Are there specific economic clusters that are starting to define the economic character of a certain node? (e.g. Woodstock being a 'creative and design' node, N'Dabeni being a biotech or food & beverage hub, etc.).

8.6.4. Land availability

- Opportunities for redevelopment and/or conversion of old buildings and or underutilised land parcels
- Vacant land – sites identified as NDAs through Land Use Model

8.6.5. Public facilities

- Established concentration of higher order facilities
- Known future investment for proposed facilities - pipeline
- Identified SS precincts as per CHSIF (backlog / optimised)
- Identify vacant/underutilised land required
- Link to CSIR work currently being completed (include backlog)

8.6.6. Existing data sources

- MSDF nodal designations
- 2012 DP nodal designations
- Current land uses
- New Development Areas – Land Use Model
- Social facilities – CSIR work

- Transport data
 - TAPs
 - PTIs
 - PRow
 - New road/rail/BRT
 - ECAMP

8.7. DESIGNATION OF NODES

8.7.1. Typology

The approach taken for categorising different types of nodes is geared towards making the District Plan more simplified and user friendly for the end user. Thus it is focussing on identifying areas of mixed use concentration of land uses taking cognisance of the scale, levels of accessibility, density and diversity of land uses.

NODES are NOT indicated where:

- There is a concentration of only one land use
- Industrial areas such as Epping, Sacks circle, Blackheath - to be indicated with an appropriate symbol as Employment Opportunity Areas
- Shopping malls/centres unless it is part of a mixed use nodal area as per the definition of nodes e.g. Century City
- Destination places which is not integrated with other land uses e.g. Table Mountain, Nature reserves (to be indicated with an appropriate symbol)
- Stations (rail or bus) that only serves a transport function – unless it forms part of a mixed use nodal area as per the definition of nodes

Taking into consideration that the level of detail will increase as we move towards sub-district guidelines the following typologies are proposed:

Table 13: Typology and characteristics of Nodes

NODAL / PRECINCT TYPES	
Types	Characteristics
Urban Node(all mixed use) E.g. Bellville, Kuilsriver, Platteklloof, Delft	✓ Concentration of different land uses/ activities including commercial, residential, industrial, civic. ✓ Diversity and mix of existing or future land uses. Retail, Commercial, Offices, Light Industrial, Residential, Social facilities, Informal. ✓ At least a mix of 3 different land uses with increased intensities if compared to surrounding areas. ✓ High level of accessibility depending on scale - public transport interchange: Rail, Bus, Tax, (Air); Private; NMT. ✓ Established area showing potential as an emerging node with potential for mix of land uses. ✓ Opportunities for redevelopment and conversion of old buildings. ✓ Vacant land – sites identified as NDAs through Land Use Model.
OTHER CLUSTERS/FOCUS AREAS – NOT TO BE INDICATED AS NODES	
Civic clusters	✓ Concentration of civic facilities including health, education, recreation, government services, etc. ✓ Scale, function and role of social facilities determine the level of the precinct. ✓ Higher order facilities normally part of metropolitan and sub-metropolitan nodes (where integrated). ✓ Concentration of lower order facilities at local and neighbourhood scale ✓ High level of accessibility through various transport modes depending on the scale of the cluster. ✓ Existing civic facilities in need of improvement/ upgrade. ✓ Available vacant/underutilised land to accommodate the backlog and future civic facilities/ clusters and public spaces identified through CSIR process. ✓ Proposed development with potential for development of civic precincts through public-private partnerships.
Destination places e.g. Tygerberg Nature Reserve(nature), Table Mountain, Mamre (heritage)	✓ Areas that are significant landmarks or location either through nature, heritage, cultural or coastal areas. ✓ Could be part of a different nodal type if other facilities are clustered with the destination place e.g. heritage landmarks with other civic facilities.

8.7.2. Scale, Role and Functions of Nodes

Taking into consideration all the work existing information the proposal is to have four scales of nodes namely Metropolitan, District, Local and Neighbourhood. The tables below indicate the role and function that each of these would have in relation to its context.

8.7.3. Symbology

To be identified using circles of different sizes to indicate the different scales of nodes. Details on the scale of the node will be captured in the text of the document. The distinction between existing and emerging nodes will only be reflected in the narrative of the development guidelines.

Table 14: Role and function, characteristics of nodes

SCALE	Metropolitan	District	Local	Neighbourhood
ROLE AND FUNCTION	City wide significant as well as significant role and function in terms of cross-border (municipal, provincial & international) importance (e.g. Bellville & CT CBD & CTIA)	Significant role and function for the district but also across district boundaries.	Specific role and function in terms of providing services and facilities that the local community require.	Specific role and function in terms of providing basic services that the immediately surrounding community require.
CHARACTERISTICS	✓ Multi-modal transport areas/interchanges with a strong focus on public transport (PT1 & PT2 zones where already incentives for parking provision). ✓ In close proximity to, along or adjacent to high accessibility and activity routes. ✓ Existing/Emerging higher intensity mixed land use locations. ✓ Established / emerging concentration of higher order public facilities and/or services. ✓ Located in the UIC where investment is prioritised. ✓ Approximate radius of facilities up to 2,5 - 3km (as a guideline) own future public investment – e.g. BRT & rail, housing, social infrastructure, commercial/ retail.	✓ Areas of high accessibility at or in close proximity of multi-modal transport interchanges. ✓ Mix of office retail, residential, commercial and civic facilities. ✓ Concentration of facilities that serve the district (but also neighbouring districts and municipalities). ✓ STA: UIC and or IGA where investment is prioritised and serves existing communities. ✓ Approximate radius of facilities up to 2km(as a guideline).	✓ Low and medium intensity mixed land use areas that serve the local community: residential, retail and civic facilities. ✓ Level of accessibility for NMT and close to access points for public transport. ✓ In close proximity of clusters of lower order civic precincts. ✓ Approximate radius of facilities up to 800m(as a guideline).	✓ Low and medium intensity mixed land use areas that serve the local residents: local shops and services e.g. hair salons, fast food outlets, doctor's surgeries. ✓ Approximate radius of facilities up to 400m(as a guideline).

S C A	Metropolitan	District	Local	Neighbourhood
OPPORTUNITIES	✓ Potential for land use intensification (high density and diversity) especially in and around very high accessibility locations (around PTIs, existing rail stations). ✓ Opportunities for redevelopment/conversion of older buildings and or underutilised land parcels. ✓ Vacant/underutilised land in close proximity – sites identified as NDAs through Land Use Model. ✓ Optimisation of existing public facilities in order to create multi-functional facilities. ✓ Opportunities to increase/enhance NMT especially to/from public transport interchanges / access point.	✓ Vacant/underutilised land in close proximity – sites identified as NDAs through Land Use Model. ✓ Opportunities for redevelopment. ✓ Opportunities to increase/enhance NMT especially to/from public transport interchanges/access point. ✓ Optimisation of existing /design of new public facilities in order to create multi-functional facilities and spaces.	✓ Small and Micro Enterprise Overlay zone of residential land and along activity streets (to be encouraged)- support home occupations. ✓ Opportunity for incremental densification through 2nd/3rd dwelling units, subdivision of larger properties and medium density residential development closer to high accessibility points. ✓ Vacant / underutilised land for medium density residential infill development – closer to employment opportunities / public transport access points. ✓ Optimisation of existing /design of new public facilities in order to create multi-functional facilities and spaces.	✓ Opportunities for home occupations (that serve local community) . ✓ Opportunity for incremental densification through 2nd/3rd dwelling units, subdivision of larger properties and medium density residential development closer to high accessibility points. ✓ Optimisation of existing public facilities in order to create multi-functional facilities and create safe public spaces.

TECHNICAL ANNEXURE 9: BACKGROUND AND METHODOLOGY FOR SPATIAL TRANSFORMATION DELINEATION

9.1. Introduction

The delineation of the boundaries between the different STA's stems from Section 6.2 (Specific actions arising from policy statements) of the MSDP (2018) where the requirement is, inter alia, to "Confirm cadastral extent and delineation of Urban Core and Incremental Growth and Consolidation Areas." The sections hereunder provide the background as extracted from the MSDP (2018) and puts forward the rationale/narrative for the delineation of these boundaries in the District Plans.

9.2. Background

The City is challenged in an era of spatial, economic and fiscal consolidation characterised by an increasing reliance on informality as well as vulnerability to environmental stresses and shocks. Accordingly, it must focus resources inwards in support of intensification and prioritise investment in favour of sustainable job-generating economic growth over the medium-term. This objective is a precondition to the realisation of all other spatial development goals including poverty reduction and social mobility, improving spatial equity and accessibility, decreasing carbon emissions and enhancing environmental protection and resource efficiency.

A new spatial transformation agenda has emerged in the planning legislation and the City has recommitted to spatial transformation in the IDP. More specifically, the City is committed to "employing a range of new generation urban growth management tools and processes" and considering "the designation of priority areas, managed growth areas and protection areas with associated development parameters and procedural guidelines".

Spatial transformation is based on reversing the impact of apartheid spatial planning by creating more opportunities for more people in highly connected areas. Further, it seeks to counter the creation of new low-income communities on the periphery of the city and the need for the poor to spend a disproportionate amount of their income on transport.

The basis for growth management in the City is established via four primary Spatial Transformation Areas (STAs) and four localised 'unique' areas namely:

- Urban Inner Core
- Incremental Growth and Consolidation Area
- Discouraged Growth Area

- Critical Natural assets
- Unique Cases: Atlantis, Paardevelei, Philippi Agricultural Areas (PHA) and Swartklip.

9.3. Approach towards delineation of STAs

The section below briefly describes the STAs and how it will be translated into the District Plans.

9.3.1. An Urban Inner Core (estimated 17% of geographic area of the City) – UIC;

The Spatial Anatomy of the (Blue) Turtle

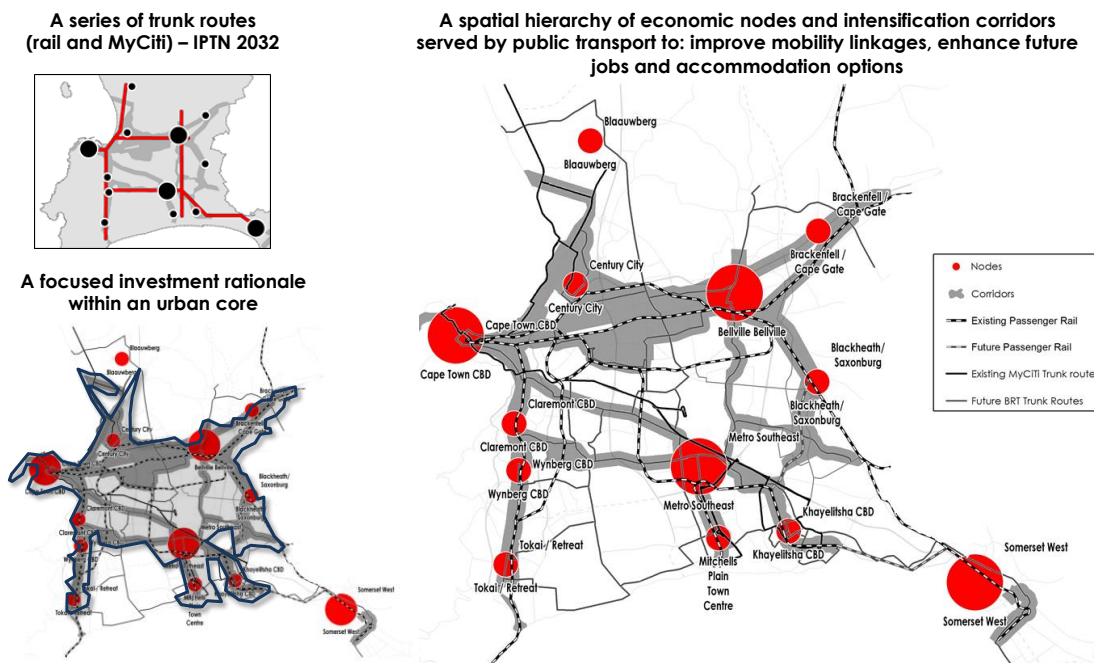


Figure 7: Spatial anatomy of the Blue Turtle

The Urban Inner Core was framed by the conceptual designation of high order nodes and land use intensification corridors (see diagram below), and underpinned by the IPTN trunk routes (rail and MyCiti). The delineation in the MSDF was based on the premises as put forward in Section 6.1. of the MSDF.

The UIC represents the priority development and investment focus for the City, where capital and operational infrastructure investment must be prioritized to support intensification of land use and spatial transformation. This includes the prioritization of budgets, spatially targeted incentives prioritized and incentives and regulatory reform. However, developing incentives, obtaining co-operation and collaboration between different spheres of government and the private sector, as well as effecting regulatory reform will take time.

Therefore, it has been resolved to retain the demarcation of the UIC in the District Plans as an informant, as the long term goal should continue to focus on achieving the aforesaid objectives. However, for the timeframe of the District Plans and in particular at this scale of planning, the spatial designation of the UIC planning should be refined to areas of 'development focus', i.e. Development Focus Areas (priority), being located within the ambit of the spatial anatomy of the UIC, i.e. focus narrowed down to targeted areas with highest level of accessibility and highest transformative impact, where dedicated infrastructure capacity and budget is required to facilitate development and or investigate development options.

9.3.2. Incremental Growth and Consolidation Areas¹⁹ (20%) – IGA;

The IGA 'rounds off' the limit of the urban footprint of the City, i.e. where land use rights have been granted and or implemented. The emphasis regarding the investment rationale is to ensure that infrastructure is maintained and upgraded to ensure efficiency and sustainability of the existing settlement pattern, but also to allow for infill development and incremental growth.

The IGA is conceptually demarcated in the MSDF, where it provides the direction where development will be considered, and ultimately be limited against the DGA, dependent on the availability of bulk services. Therefore, development applications will be considered in the IGA's in terms of desirability, as in other areas within the urban footprint.

The focus will therefore need to be on the demarcation of the outer limits of the urban footprint. It needs to be recognized that the demarcation of the boundary between the IGA & DGA is conceptual in the MSDF, i.e. 4ha polygons. It is also acknowledged that since the approval of the MSDF, clarity has been sought in this regard, and in certain instances smaller properties, such as smallholdings, were confirmed to be located in the IGA. In this instance, the urban development edge has been re-introduced as a mechanism between the IGA's and the Discouraged Growth Areas (DGA).

9.3.3. Discouraged Growth Areas (28%) – DGA;

Properties located in the DGA implies that, in general land falling within the 'Discouraged Growth Areas' means that, in general, urban development will not be supported, and if a development is approved in such area, the developer will be responsible for the provision of all bulk services, as well as the maintenance thereof for a period of time, to the satisfaction of the different utility departments of the City.

9.3.4. Critical Natural Areas (34%) – CNA

The natural assets include protected areas and conservation areas where the city is committed to service, protect, enhance and extend the assets. This will however be dealt with in more detail in the Environmental section of the District Plan.

9.3.5. Unique Cases: Atlantis, Paardevlei, Philippi Agricultural Areas (PHA) and Swartklip.

The identification of the Spatial Transformation Areas follows a spatial logic and public sector investment logic underpinned by city-wide opportunity and need. It is however, recognized that these categorizations, at a metropolitan-scale, are not capable of resolving land use conflicts in certain areas where a more nuanced approach is required. Four unique cases have been identified where the spatial transformation categorization does not immediately reflect the intent of the SDF. The merit of each unique case is motivated in Technical Supplementary B of the MSDF and guidelines provided.

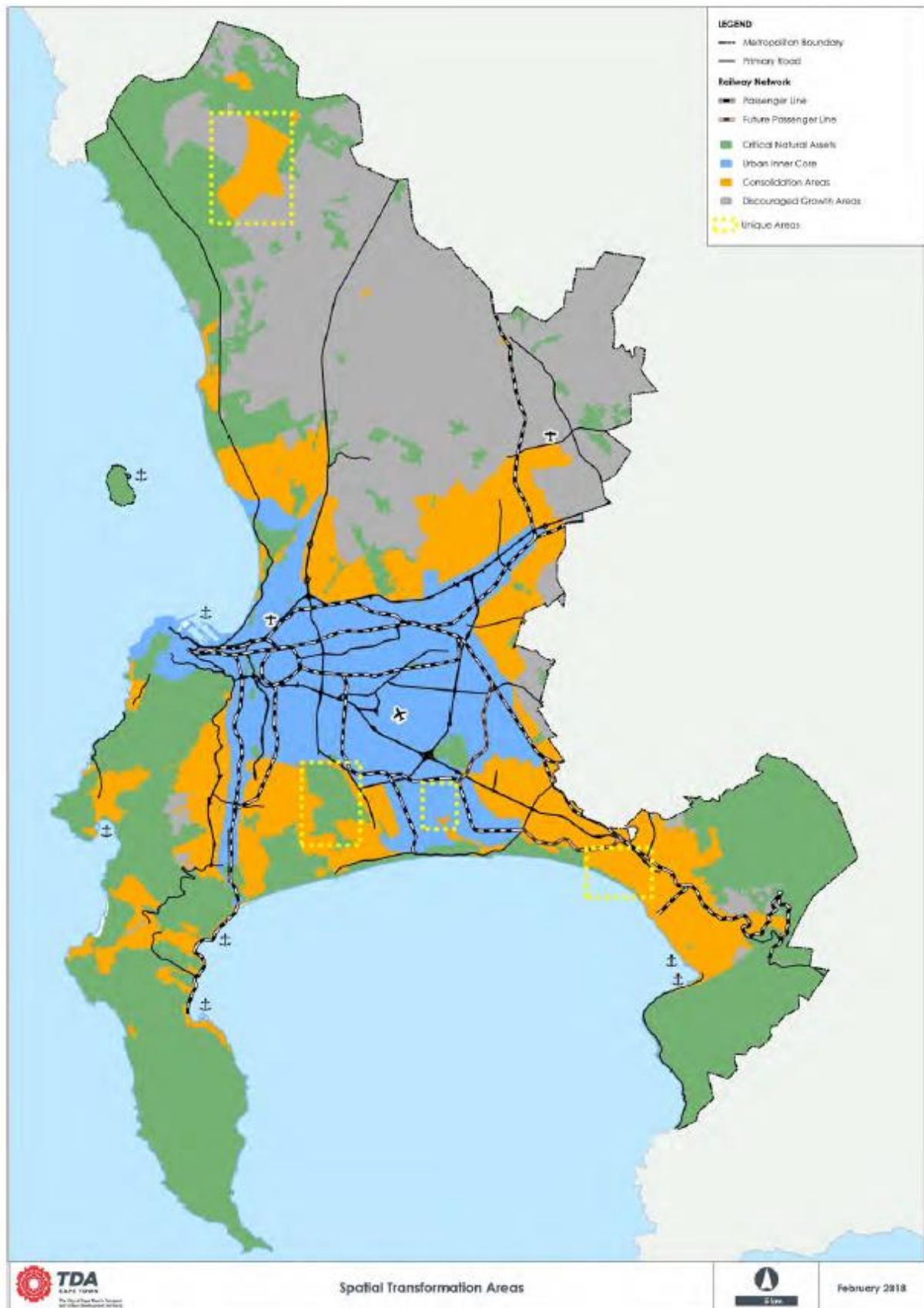


Figure 8: Spatial Transformation Areas (extract from CTMSDF, 2018)

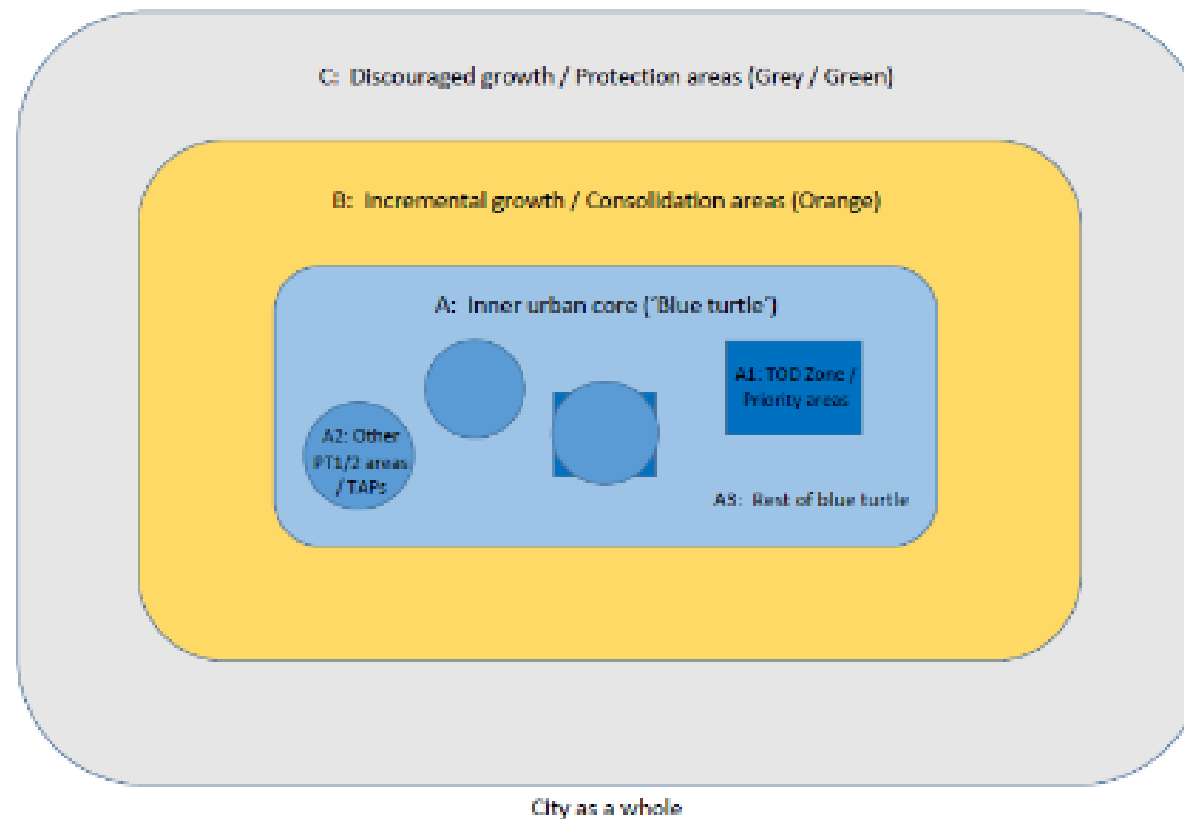
9.4. Guidelines for delineation

The section below will highlight the guidelines used during the delineation of the STAs in the District Plans. The delineation has focussed on three main areas namely:

- Delineating Development Focus Areas within the Urban Inner Core(UIC), and
- Delineation of the “urban development edge” between the Incremental Growth & Consolidation Area (IGA) and Discouraged Growth Area (DGA)

AREA OF DEMARCATION OR DELINEATION	GUIDELINES FOR DEMARCATION AND DELINEATION	SUPPORTING INPUT DATA
A. DEMARCATING AREAS WITH DEVELOPMENT OR REDEVELOPMENT OPPORTUNITY IN THE URBAN INNER CORE	1. Preamble: The delineation of the Urban Inner Core will remain as an informant in the DP (meaning a first priority for bulk services provision). The demarcation in the DP will be narrowed down to targeted areas for urban restructuring that have the highest potential spatial transformative impact (i.e. <i>addressing issues of spatial fragmentation, inefficient urban form and segregation by integrating communities and increasing opportunities to a greater number of people in highly connected areas</i>) where dedicated budget, planning or investment is being prioritized to facilitate development. (Note that these areas should be inside the MSDF delineation). The DFAs are to be prioritized for redevelopment and further intensification/ <i>investigation</i> where applicable.	
	Demarcation of Development Focus Areas:	TAP's, PTI's PT 2 areas are also a guiding tool. Land use overlays or incentive mechanisms such as the UDZ, Heritage exemption

Spatially targeted application of TOD toolkit (Incentives and disincentives)



areas,
Densification
overlay zones,
inclusionary
housing areas,
etc.

Note the above figure describing the approach to spatially targeting TOD.

- focus areas around Public Transport Interchanges;
- focus areas around existing rail stations where there is potential for intensification and elements of social infrastructure or employment in close proximity;
- areas with potential for intensification along existing BRT routes;

	• areas along development corridors (structuring corridors such as freeways questioned due to limited accessibility), i.e. activity routes or activity streets, where such routes will contribute to the principle of TOD-development. There needs to be a sound spatial and market logic for designation (performance vs potential).	
	2. What the focus for identification & delineation should be: • Areas where the focus is 'urban restructuring' and have the highest potential transformative impact. • Areas where dedicated funding (operational or capital), planning or investment is available (or being applied for) and will give rise to implementation. Planning work should at least commence within the lifespan of the District Plan (+- 10 years). ◦ priority areas of opportunity as identified in Catalytic Land Development Pipeline that would serve as catalysts to unlock the potential for integrated development with cross-cutting benefits; ◦ prioritized precincts or local areas in the Integration Zones; ◦ other high profile integrated projects under investigation that are proposed to be implemented in the lifespan of the District Plan. • Areas should generally be considered accessible in line with the City's MSDP and TOD objectives (i.e. within nodes and along development corridors). • Specifically, delineated priority areas i.e. not entire suburbs or corridors.	• NDAs from Land Use Model • Cadastrally-defined Nodes • Cadastrally-defined Structuring Corridors
	3.What the focus for identification should not be: • New Development Areas (even if funding is available i.e. only a housing project) or infill opportunities in general. Areas should generally not overlap with DFA's except in instances where NDAs form part of a broader area identified for urban restructuring. • General Areas for urban intensification, even if located in development/ activity corridors. • Areas with a singular focus, be it transport upgrades, coastal upgrades, public facility upgrades/ development, an informal settlement and/or housing projects. • Should not be conflated with the Urban Support Areas (USAs) or areas of urban regeneration or urban management interventions (i.e. MURP). • Avoid areas along mobility corridors such as freeways except where these are intersected with public transport routes and contribute to the principle of TOD and creation of employment opportunities. There will be the few anomalies such as the airport (CTIA), N1 City, Plattekloof Road (Panorama), Cape Gate/Okavango Road. These are primarily where public transport intersects with freeway systems. The Ottery Road leg of Phase 2A should be demarcated as a priority area. • Areas for environmental conservation and or investigation.	

B. DEFINING THE BOUNDARY OF THE INCREMENTAL AND CONSOLIDATION AREAS AND Discouraged Growth Areas	1. Preamble: Note that the objective is re-introducing the urban edge, defining the boundary between the Incremental Growth & Consolidation Areas and the Discouraged Growth Areas. Input received from the Public Participation Process, land parcels included already via enquiries from consultants/ land owners (and clarity been given by City Growth Management) should be considered. Furthermore, the delineation should be a process of 'rounding off' the boundary, focussed on the following directives. Note that the urban edge as depicted in the existing District Plans (2012), should be utilized as the guiding tool. Also note that the discussions held with the Provincial Dept. of Agriculture and Urban Management should also assist.	
	2. The boundary should not straddle protective natural environments, such as nature conservation areas, river corridors, etc. The line should at all times be a cadastral delineation, except in instances where it is argued that the development application process (inclusive of EIA's) will determine the final line. In those instances a broken line is utilised.	
	3. Where spatial logic allows, linking lower income areas with the urban footprint, should be considered. Pockets / islands of urban related land uses should be minimised working from the principle that the land use rights are "what they are" and will not be expanded further. In such instances the edge needs to be drawn around such settlements, or if it is alone- standing urban uses, should be left outside the urban edge.	
	4. Where it makes sense to 'rounding' off the edge of the urban footprint, where e.g. urban development will bring along an increase in accessibility via road linkages, as well as employment generating land uses. Note that low potential agricultural land does not provide adequate reason for urban development. In certain instances it may be sensible where a land parcel/ property does not represent an agricultural unit anymore, i.e. less than 20ha, (may be different land owner, road extension impacted on land parcel), but the approach should be cautious, and other factors such as accessibility, spatial location, development trend, infrastructure provision etc., surrounding urban/ rural character also need to be considered.	
	5. Please check all MSDF "exceptional cases" tabulated in Section 5.2. Re: Development directives – these were "place-holders" in specific locations that could not be resolved at the time of the approval of the MSDF. Each had specific reasons and logic outlined.	
	6. Areas for inclusion should not include areas where the gradient is steeper than 1:4.	Topography (Gradient < 1:4)
	7. Exclusion zones and other physical and/ or biophysical risk factors such as Koeberg should be respected.	
	8. Other considerations that should be considered, is high visual impact.	

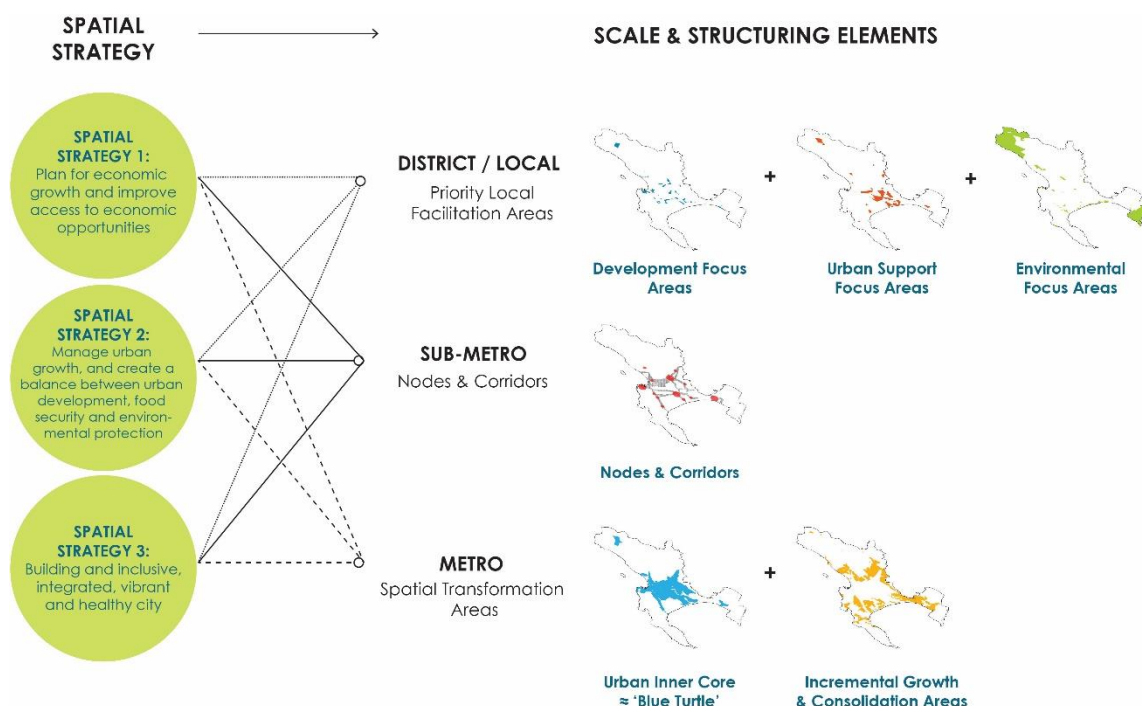
	9. There may be exceptional cases that relate back to drafting the MSDF where agreements have been resolved afterwards											
C. Defining the Coastal edge	1. The Coastal Edge is a demarcated area around the coast in such a position as to limit urban development, primarily to protect coastal resources, and avoid hazards and financial risks pertaining to areas at risk of flooding, storm surges and long term climate change impacts.											
	The coastal edge also represents the City's draft coastal management line. This aligns with the requirements of the Integrated Coastal Management Act, Act 36 of 2014, specifically section 25, that requires municipalities to delineate coastal management. See guidelines from MSDF below:											
	<table><tr><th>ENVIRONMENTAL SUBTHEME</th><th>LAWS / POLICY</th><th>AUTHORITY</th><th>PRINCIPLE THAT APPLIES WHEN CONSIDERING ALLOCATION OF DEVELOPMENT RIGHTS</th><th>EXCEPTIONS</th></tr><tr><td>Coastal Edge Maps 5a, b and d</td><td>Integrated Coastal Management policy and Climate Change Policy (draft), Coastal Economic and Spatial Strategic Framework (draft) and Coastal Management Bylaw (draft).</td><td>CCCI</td><td>Urban development is precluded on the seaward side of the declared coastal edge. Where the coastal edge has been defined to buffer infrastructure against the impacts of coastal processes and to protect coastal ecosystems, it should not be amended. Where development abuts the landward side of the coastal edge but which is at risk to coastal processes, coastal overlay zones must be developed and applied to these areas.</td><td>The coastal edge has made provision for development opportunities at strategically located identified coastal nodes such as Silverboomsstrand, Strandfontein, Mrandi, Morwabisi and Kapteinsskip. Provision is made for the refinement of the coastal edge in these areas once feasibility studies have been undertaken. A number of recreational destination areas within intensive urban areas of high economic value include significant areas seaward of the coastal edge. These areas should remain as primarily recreational areas, but need substantial upgrade to meet changing recreational needs. Provision is made for the refinement of the coastal edge in these areas once feasibility studies have been undertaken or the outcome of current processes are finalised.</td></tr></table>		ENVIRONMENTAL SUBTHEME	LAWS / POLICY	AUTHORITY	PRINCIPLE THAT APPLIES WHEN CONSIDERING ALLOCATION OF DEVELOPMENT RIGHTS	EXCEPTIONS	Coastal Edge Maps 5a, b and d	Integrated Coastal Management policy and Climate Change Policy (draft), Coastal Economic and Spatial Strategic Framework (draft) and Coastal Management Bylaw (draft).	CCCI	Urban development is precluded on the seaward side of the declared coastal edge. Where the coastal edge has been defined to buffer infrastructure against the impacts of coastal processes and to protect coastal ecosystems, it should not be amended. Where development abuts the landward side of the coastal edge but which is at risk to coastal processes, coastal overlay zones must be developed and applied to these areas.	The coastal edge has made provision for development opportunities at strategically located identified coastal nodes such as Silverboomsstrand, Strandfontein, Mrandi, Morwabisi and Kapteinsskip. Provision is made for the refinement of the coastal edge in these areas once feasibility studies have been undertaken. A number of recreational destination areas within intensive urban areas of high economic value include significant areas seaward of the coastal edge. These areas should remain as primarily recreational areas, but need substantial upgrade to meet changing recreational needs. Provision is made for the refinement of the coastal edge in these areas once feasibility studies have been undertaken or the outcome of current processes are finalised.
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2. The demarcation should be; "As per the approved 2018 MSDF and in line with the Integrated Coastal Management Act, Act 36 of 2014, Section 25."												
3. The base info layer on the delineation as per the MSDF is available from the Urban Management Branch.												

TECHNICAL ANNEXURE 10: DEFINING CRITERIA FOR THE IDENTIFICATION OF THE DFAS, USFAS AND EFAS

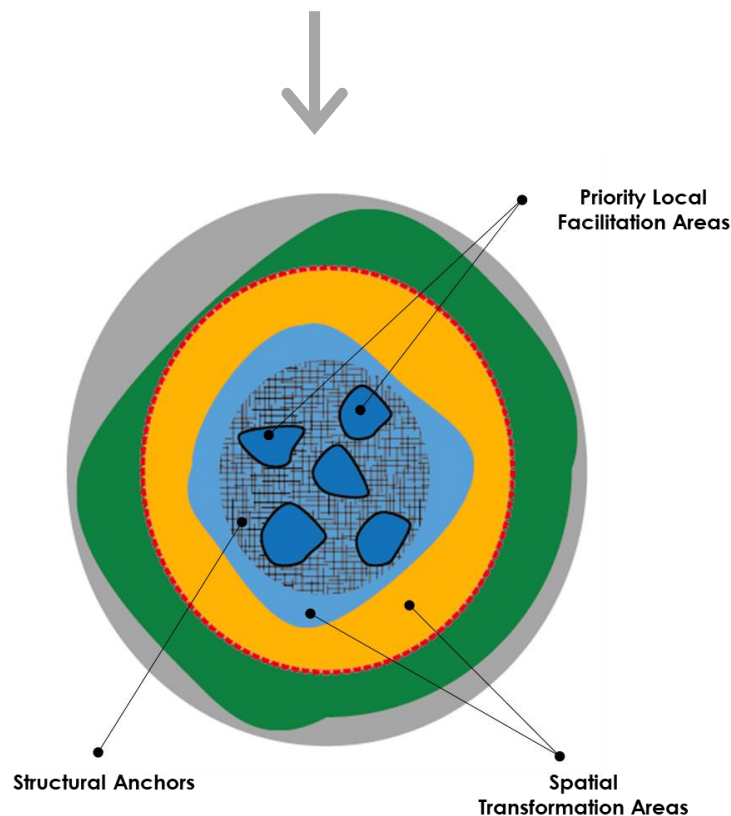
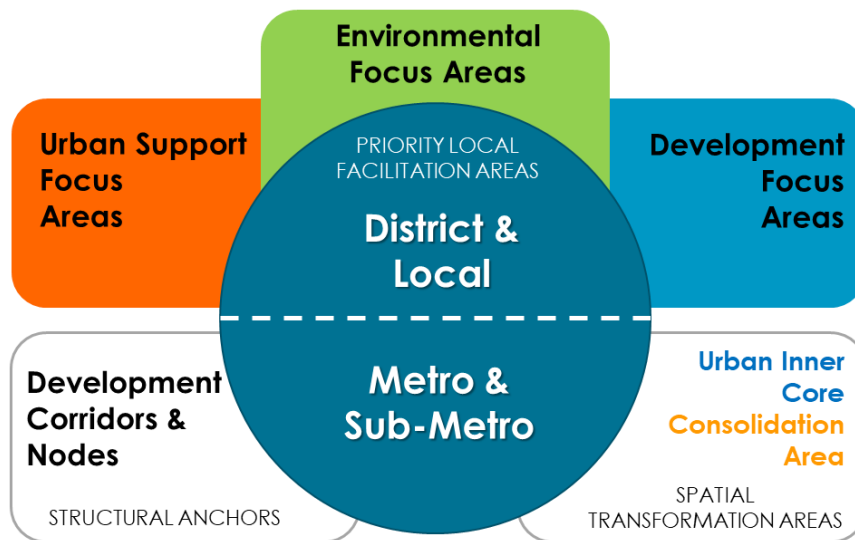
Priority Local Facilitation Area Identification Methodology

10.1.1. Overview

The purpose of the District Plan spatial targeting framework is to identify and prioritise specific areas within each district for public investment and / or incentives in the short-medium term in order to implement the spatial vision and objectives reflected in the District Plan. Areas are prioritised based on the rationale and emphasis for growth management and investment set out by the MSDF. The DSDF Spatial Targeting Framework consolidates the relevant spatial structuring elements that best reflect the City's spatial strategies & priorities at each scale of planning.



The District SDF Spatial Targeting Framework expands upon the MSDF's Spatial Prioritisation and Investment Framework through the designation of, new district / local level spatially targeted areas, the **Priority Local Facilitation Areas**. At this scale, greater attention is placed on local elements that should inform and direct implementation, public investment decisions, budgets and planning focus. The three Priority Local Facilitation Areas identified are the Development Focus Areas, the Urban Support Focus Areas, and the Environmental Focus Areas.



The Priority Local Facilitation Areas provide the district level basis for spatial prioritisation and aim to guide implementation through directing public investment, incentives, budgets and planning focus for the short to medium term (i.e. the lifespan of the DSDF).

While several priority local facilitation areas for each of the districts have been identified; the framework is intended to be flexible and other local areas may be identified as areas of priority for during the 5 year review of the integrated DSDF and EMFs.

10.1.2. Metro and Sub-Metro Spatial Informants

At the metropolitan level, the basis for growth management and investment in the city is through four primary Spatial Transformation Areas:

- Urban Inner Core
- Incremental Growth & Consolidation Areas
- Discouraged Growth Areas
- Critical Natural Areas

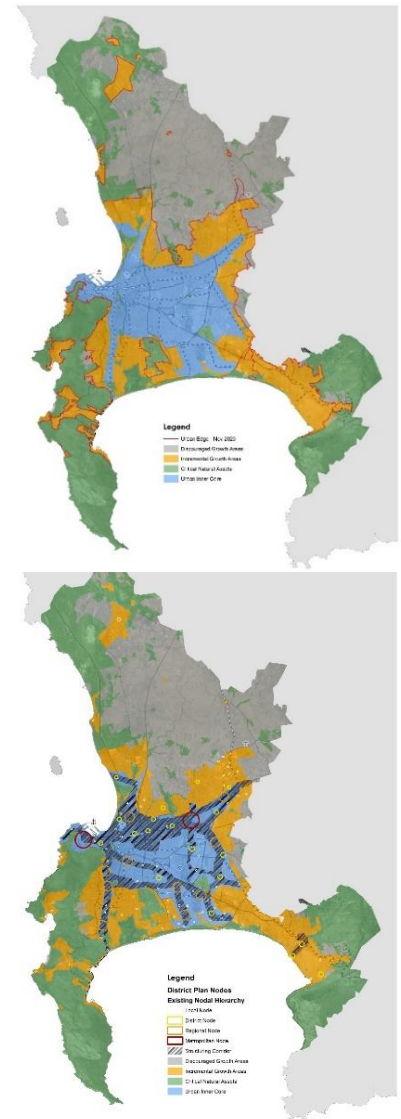
At a sub-metro level the basis for spatial prioritisation are the major structuring elements:

NODES:

- Urban areas appropriate for a clustering of higher intensity (i.e. diversity and density) land uses that are located and concentrated at points of maximum accessibility (either through public and/or private transport), exposure, convenience and opportunity.

DEVELOPMENT CORRIDORS:

- Urban areas of high-intensity (i.e. dense and diverse) nodal or 'strip' development generally supported by a hierarchy of transport services that function as an integrated system to facilitate ease of movement for private and public transport users. They are characterised by a dynamic, mutually supporting relationship between land use and the movement system.



10.1.3. District / Local Level Spatial Informants

At a district / local level the basis for spatial prioritisation and guiding implementation, investment, budgets and planning focus are the following newly delineated priority local facilitation areas.

10.1.4. Priority Local Facilitation Area Definition:

Spatially targeted areas identified in the DSDFs that provide the district / local level basis for spatial prioritisation and aim to guide implementation through directing public investment, incentives, budgets and planning focus for the short to medium term. These include the Development Focus Areas (DFAs), Urban Support Focus Areas (USFAs) as well as Environmental Focus Areas (EFAs).

DEVELOPMENT FOCUS AREAS

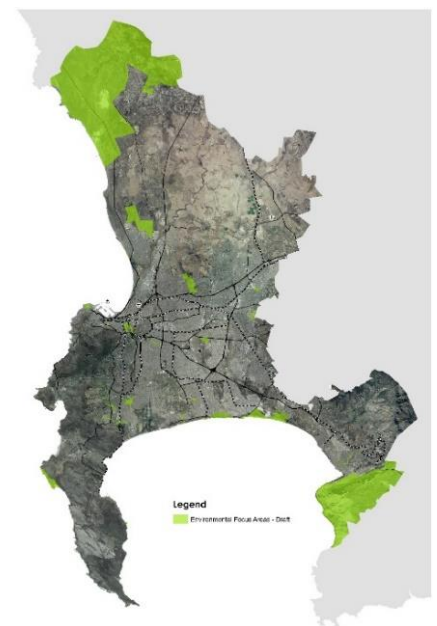
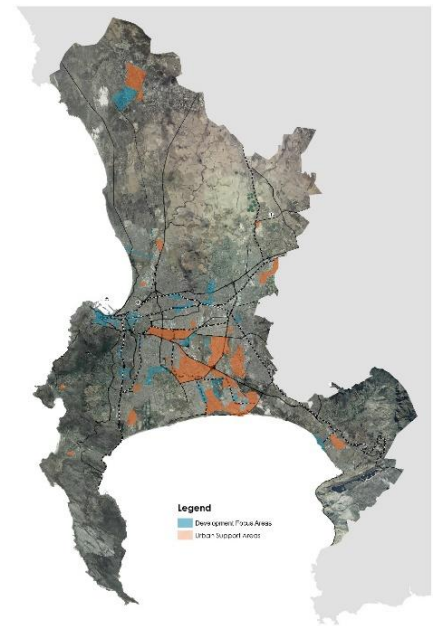
- Targeted local areas for urban restructuring and planning focus in the short - medium term that have the highest potential spatial transformative impact with dedicated budget, planning or investment to facilitate development.
 - Includes CLDP, Integration Zone PLAs, Priority Precincts, SEZ, ECAMP

URBAN SUPPORT FOCUS AREAS

- Spatially targeted local areas that are faced with a combination of challenges including but not limited to infrastructure failure and service delivery challenges; high socio-economic need and crime rates and require a coordinated public investment and planning approach in the short to medium term.
 - Include MURP / MVSA

ENVIRONMENTAL FOCUS AREAS

- Spatially targeted areas with critical environmental significance (in terms of national conservation targets) outside of formally protected areas which have been identified as priority areas for investment and/or protection in the short to medium term, but are not within designated DFAs and USFAs and hence require equivalent focus.



The identification criteria and rationale behind each of these areas is discussed below.

10.2. Development Focus Areas (DFAs)

10.2.1. Definition

Targeted areas for urban restructuring and planning focus in the short - medium term that have the highest potential spatial transformative impact with dedicated budget, planning or investment to facilitate development.

10.2.2. Defining criteria for the identification & delineation of DFAs

The integrated DSDF and EMFs refined the Urban Inner Core to areas of 'development focus' or priority, i.e. Development Focus Areas for the period of the DSDF (10 year cycle) – the **dark blue**.

Focus narrowed down to targeted areas for **urban restructuring** that have the highest potential **spatial transformative impact** (*i.e. addressing issues of spatial fragmentation, inefficient urban form and segregation by integrating communities and increasing opportunities to a greater number of people in highly connected areas*) where **dedicated budget, planning or investment** is, and should be prioritised to facilitate development.

These are areas that have a high potential to attract private sector investment.

STEP 1: IDENTIFICATION & DELINEATION

A. Identification Criteria

The DFAs are to be prioritized for redevelopment, further intensification and public investment based on the following criteria. To assist with the identification of DFAs, a list of spatial data and information has been recommended for consideration and be will used to verify the sites once identified.

Criteria	Data
1. Areas where the focus is 'urban restructuring' and have the highest potential transformative impact. These are areas that exhibit the highest location potential linked to the definition of Spatial Transformation and should be identified within the City's Urban Inner Core unless as far as possible.	• STAs • Development Corridors • Nodes • Mixed Use Intensification Areas
2. Areas linked to projects with a multi-sectoral focus where there is funding available (be it operational and/or capital), or funding to be applied for, for planning that will give rise to implementation.	• CLDP • Integration Zone Priority Areas and Precincts • Approved LASDFs • Future Local Area or Precinct Planning Priorities identified in the DSDF

a. priority areas of opportunity as identified in Catalytic Land Development Pipeline that would serve as catalysts to unlock the potential for integrated development with cross-cutting benefits e.g. Bellville PTI, Philippi Opportunity Area. b. Planned LSDFs, Precinct Plans, etc. c. prioritized precincts or local areas in the Integration Zones d. other high profile integrated projects under investigation that are proposed to be implemented in the lifespan of the District Plan such as the Atlantis SEZ.	
3. Areas should be considered highly accessible in line with the City's MSDF and TOD objectives.	• IPTN (Integrated Public Transport Network); • PRow (Public Right of Way) • Transit Accessibility Precincts • Key development routes and connector route and intersections
4. 5 -10 year frame - Planning work at least to commence within the lifespan of the DSDF.	

B. Delineation Guidelines

- Do not delineate areas where **development is not permitted**. These include Proclaimed Environmental Areas and Risk and Precautionary Areas, inter alia:
 - Conservation Areas and Nature Reserves
 - Aquifer Extraction Areas
 - 5km Koeberg Evacuation Zone etc.
 - Land Fill Buffer
 - Exclusionary Buffers to Risk Industries
 - Discouraged Growth Areas
 - Areas outside the coastal edge

Consider the relevant spatial data in the Biophysical and Risk Sections of the Baseline Analysis.
- Specifically, **delineate priority areas** i.e. not entire suburbs or corridors.
- Delineation should be aligned to existing precinct or prioritised area boundaries where applicable (i.e ECAMP, CLDP or IZ Precincts)

C. What the focus for identification **should not be**:

- New Development Areas (even if funding is available i.e. only a housing project) or infill opportunities in general. Areas should generally not overlap with

DFA's except in instances where NDAs form part of a broader area identified for urban restructuring.

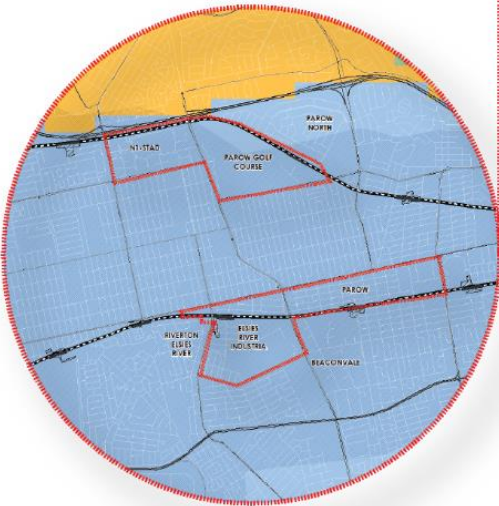
- General areas for urban intensification, even if located in development/ activity corridors.
- Areas with a singular focus, be it transport upgrades, coastal upgrades, public facility upgrades/ development, an informal settlement and/or housing projects.
- Should not be conflated with the Urban Support Focus Areas (USFAs) or areas of urban regeneration or urban management interventions (i.e. MURP).
- Avoid areas along mobility corridors such as freeways except where these are intersected with public transport routes and contribute to the principle of TOD and creation of employment opportunities.
- Areas for environmental conservation and or investigation.

STEP 2: VERIFICATION

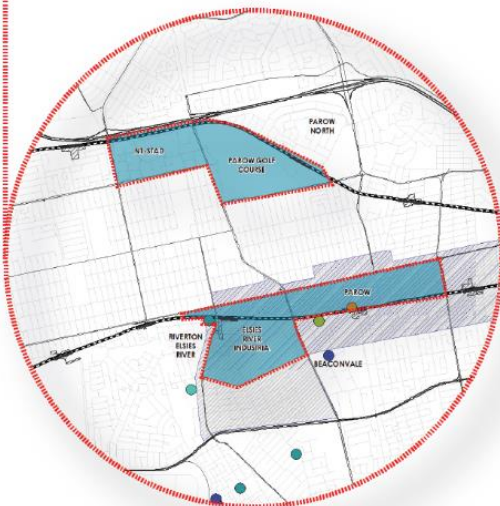
Once the planners have identified and delineated their DFAs, the following checklist will be used to verify that each area identified meets the criteria. An area must meet all the criteria in the checklist to be considered a DFA.

Development Focus Areas - Criteria

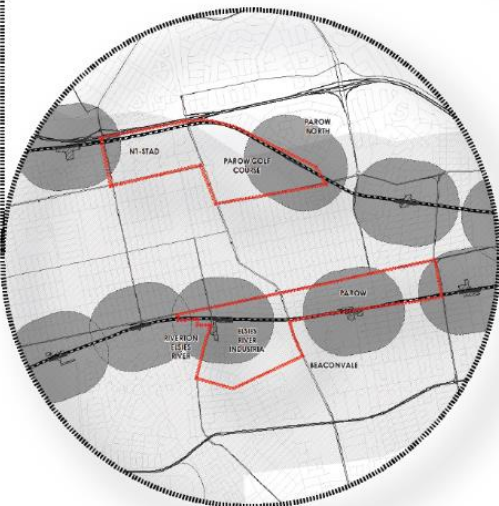
	Urban Restructuring / Transformative Potential	High Levels of Accessibility	Dedicated Funding, Planning or Investment (<10 years)	Multi-Sectoral Focus	Priority Areas			Final Selection	Comment
					CLDP Programme	Integration Zone Priority Precincts	Other High Profile Project		
	Qualitative - Location Potential / Spatial Vision	IPIN (PT Activity Levels) and PROW Networks	Future Local Area/ Precinct Priorities	Qualitative – Public Investment and Projects	Full Catalytic Land Development Pipeline	Priority Precincts Identified in Integration Zones	Special Economic Zones, Other		Justification / notes / other
Name (Image)	✓	✓	✓	✓	–	✓	–	✓	Meets all criteria



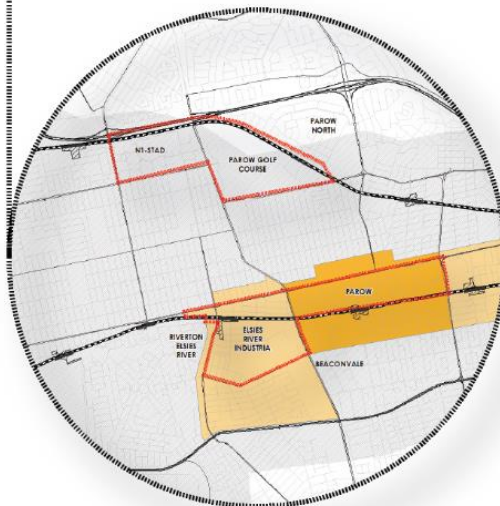
- ✓ Urban Inner Core
- ✓ Development Corridor
- ✓ Node



- ✓ Heritage Exemption
- ✓ Prioritised Precinct Plan
- ✓ Multiple Investment Projects



- ✓ Existing Rail (IPTN)
- ✓ Existing TAPs
- ✓ Development Route
- ✓ Connector Route



- ✓ VRC Integration Zone Priority Area
- ✓ Level 1 CLDP Priority Site (Parow Golf Course/ Monte Vista Station)

Development Focus Areas - Criteria								Other Opportunity Areas		
	Urban Restructuring / Transformative Potential	Dedicated Funding, Planning or Investment (<10 years)	High Levels of Accessibility	Multi-Sectoral Focus	Priority Areas			ECAMP	Final Selection	Comment
					CLDP Programme	Integration Zone Priority Precincts	Other High Profile Project			
	Qualitative - Location Potential / Spatial Vision	Future Local Area/ Precinct Priorities	IPTN (PT Activity Levels) and PROW Networks	Qualitative – Public Investment and Projects	Full Catalytic Land Development Pipeline	Priority Precincts Identified in Integration Zones	Special Economic Zones, Other	Areas identified as part of the Economic Areas Management Plan		Justification / notes / other
Name (Image)	✓	✓	✓	✓	–	✓	–	✓	✓	Meets all criteria
Name (Image)	✓	✗	✓	✓	✓	–	–	–	✗	
Name (Image)	✓	✗	✓	✗	–	–	–	✓	✓	

10.3. Urban Support Focus Areas (USFAs)

10.3.1. Definition

Spatially targeted areas that are faced with a combination of challenges including but not limited to infrastructure failure and service delivery challenges; high socio-economic need and crime rates and require a co-ordinated public investment and planning approach in the short to medium term.

10.3.2. Defining criteria for the identification & delineation of USFAs

The Urban Support Focus Area designation aims to identify areas which need support over and above the regular processes available. It is a call for assistance from all involved. This designation recognises areas characterised by a combination of: infrastructure failure and service delivery challenges; high socio-economic need / vulnerability and a need for coordination among projects, programmes and stakeholders.

The following characteristics may be present: uncertainty of what should be done, how and by whom; informality and overlapping challenges; high socio-economic vulnerability, standard norms, guidelines and processes may be incongruous with the contextual realities; the area is in need of public investment but not necessarily strategically located; there is room for improved communication between stakeholders, including within government, and with resident communities; there may be plans for the area but implementation is lacking.

The key emphasis and desired outcomes of these areas include:

- Implementation of programmes that enhance social and economic mobility;
- Service upgrading, local economic development and poverty alleviation;
- Facilitation of a range of human settlements interventions (delivery methods, partnerships, typologies etc.);
- Social infrastructure backlogs and operational deficiencies addressed;
- Elimination of non-essential regulatory constraints on informal economic activity within poorly-located marginal areas;
- Extension of effective urban management practices and programmes;
- Unlocking development of large-scale economic opportunities within close proximity to areas of social need; and
- Streamlining of regulatory requirements to support and facilitate formal densification that is taking place in settlement. (e.g. Boarding house developments in Dunoon).
- Spatial Planning interventions including local area frameworks
- Plan and implement safe well lit walkways and enhance pedestrian movement systems and public realm interventions to create a sense of place.

POLICY GUIDELINES PROCESS TO BE CONCLUDED WITH POLICY & STRATEGY

STEP 1: IDENTIFICATION & DELINEATION

A. Identification Criteria

The USFAs are to be prioritized for public investment and support based on the following criteria. To assist with the identification of the USFAs, a list of spatial data and information has been recommended for consideration and be will used to verify the sites once identified.

Criteria	Data
1. Areas of high socio-economic need / vulnerability	• Social Vulnerability Index (No annual update) ◦ Informality <i>high density in informal settlements and backyard shacks.</i> ◦ Density (<i>household and population densities per km²</i>) ◦ Poverty: income based segmented classification (NLI), which <i>classifies areas according to their income and various lifestyle characteristics</i> • Crime Levels (SAPS 2019/20) ◦ Reported Cases (all crimes) per Police Precinct ◦ Annual updates from Corporate Services • Social Facilities Backlog Data Social Facility Backlog - Level 5 Catchment from CSIR Work - Ziyaad Lalla (No annual update)
2. Areas with a combination of service delivery challenges / built environment need.	• ~~MTIIF 2015 (COCT) Infrastructure constrained areas supplemented with DSDF updates~~ ◦ Concern regarding replicability / reliability of dataset • WTS Program Outputs ◦ Urban Management / Service Delivery Issues ◦ Compare to C3 output
3. Areas with a need for coordination: - A local area planning initiative is needed OR is in progress OR has been completed, And there is not a clear single department to take forward the implementation - There are 2 or more government projects or programmes in process and there is opportunity for greater coordination. This does not mean that there is not coordination already, but that the area and project managers could use more assistance.	• Qualitative Input from district planner • Alignment with MURP/MVSA • Confirmation with UISP

- **New Changes 2021/07/14**

Criteria 1 and 2 were combined in a multi-criteria analysis matrix, all data inputs were converted to a score of between 1 and 5 depending on severity and combined with the following weightings:

	Weighting
Socio-Economic Vulnerability Index	2
Social Facility Backlog	1
Crime Levels	1
Urban Management / Service Delivery	1
Infrastructure Capacity Backlog	0

The MCA map attached (first two criteria) acts as a guide to assist in identifying areas where the identified Vulnerability criteria may be relevant. The dataset is filtered as below.

0-200 = lower need,

>200 = higher need

B. Delineation Guidelines

- Using the areas identified in the map as a guide, select areas which also meet the third criteria - Need for Coordination
- Specifically, **delineate priority areas** i.e. not entire suburbs or corridors.
- Delineation should be aligned to existing precinct or prioritised area boundaries where applicable (i.e. ECAMP, CLDP, MURP, MVSA or IZ Precincts).

C. What the focus for identification should not be:

- Remember the following are not automatically included:
 - Informal Settlements,
 - In situ upgrade,
 - Land Invasions.

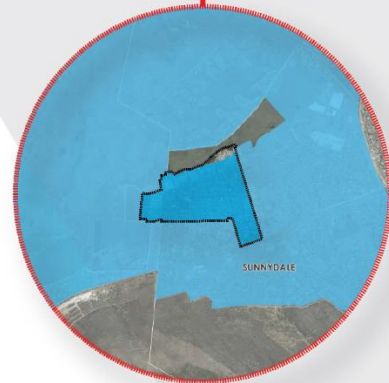
The area needs to fit the criteria above and be a place where ADDITIONAL support to the usual processes is required.

STEP 2: VERIFICATION

Once the planners have identified and delineated their USFAs, the following checklist will be used to verify that each area identified meets the criteria. An area must meet all the criteria in the checklist to be considered a USFAs.

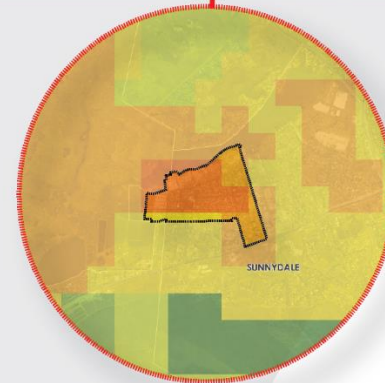
Urban Support Areas - Criteria

	Service Delivery / Built Environment Need	Social Need				Co-ordination	Final Selection	Comment
	infrastructure failure and service delivery challenges (MTIFF, 2015) supplemented with DSDf updates	Social Vulnerability Index			Crime Data	Qualitative - local area planning initiative required / in progress - no clear lead - opportunity for greater coordination.		Justification / notes / other
		Informality Indicator	Density Indicator	Poverty Indicators				
Name (Image)	✓	✓	✓	✓	✗	✓	✓	



Severe Lack of Infrastructure Capacity

+



High Socio Economic Vulnerability

=



Combined Scoring



Delineated USA

	Urban Support Focus Areas - Criteria							
	Service Delivery / Built Environment Need	Social Need			Co-ordination	Final Selection	Comment	
	infrastructure failure and service delivery challenges (MTIFF, 2015) supplemented with DSDF updates	Social Vulnerability Index			Crime Data		Qualitative - local area planning initiative required / in progress - no clear lead -opportunity for greater coordination.	Justification / notes / other
		Informality Indicator	Density Indicator	Poverty Indicators				
Name (Image)	✓	✓	✓	✓	✗	✓	✓	
Name (Image)	✓	✗	✗	✗	✗	✗	✗	
Name (Image)	✓	✓	✓	✓	✓	✗	✗	

10.4. Environmental Focus Areas (EFAs)

10.4.1. Definition

The Environmental Focus Areas (EFAs) are areas with critical environmental significance (in terms of national conservation targets) outside of formally protected areas which have been identified as priority areas for investment and/or protection for the short to medium term (the lifespan of the District Plan).

10.4.2. Defining criteria for the identification & delineation of EFAs

Balancing the pressures of urbanisation and environmental management requires prioritising the management of environmental resources as part of a more integrated approach to climate change adaptation and adapting urban development in order to promote more efficient use of resources and reduce the impacts of urban development on the environment.

This designation recognises the role of environmental resources in terms of its contribution toward enhancing the economic potential and social amenity value of areas whilst improving the City's resilience in the face of climate change and other threats, particularly in more vulnerable areas and/or communities.

To identify and prioritise environmental focus areas, a set of criteria was used to select environmental projects and programmes which are/or have:

1. Catalysts for integrated development with cross-cutting benefits –
 - Supports environmental priorities as well as enhance the economic potential and social amenity of the area.
 - Reduce biophysical risk to communities
 - Areas under threat from urban development
2. Funding, Planning or Investment within the 3 year MTREF period or planning for funding/ in process or to be applied for within the 5-10 year IDP and District Plan lifespan.
3. Priority Area Alignment (i.e. DFAs, USFAs, Destination Places or new EFAs based on options provide).

The final selection of projects which informs the identification of Environmental Focus Areas is based on there being evidence of all 3 abovementioned criteria.

STEP 1: IDENTIFICATION & DELINEATION

A. Identification Criteria

The EFAs are to be prioritized for public investment and support based on the following criteria. To assist with the identification of the EFAs, a list of criteria has been recommended for consideration and be will used to verify the project/area once identified.

Criteria	Project /Area Scope
Catalysts for integrated development with cross-cutting benefits	• Supports environmental priorities as well as enhance the economic potential and social amenity of the area. • Reduce biophysical risk to communities • Areas under threat from urban development
Funding, Planning or Investment	• Dedicated Funding, Planning or Investment (<10 years) ◦ within the 3 year MTREF period • Planning for Funding/ in process or to be applied for ◦ within the 5-10 year IDP and District Plan lifespan.
Priority Area Alignment (i.e. DFAs, USFAs, Destination Places or new EFAs based on options provide).	• Development Focus Areas • Urban Support Focus Areas • Destination Places • Environmental Focus Areas

B. Delineation Guidelines for Environmental Focus Areas

- Areas with critical environmental significance (in terms of national conservation targets) and consolidation potential outside of formally protected areas not aligned with already designated DFAs and USFAs, preferably state-owned (i.e. municipal, provincial, national). Areas within formally protected areas will only be considered where prioritisation is strongly motivated and verified.

C. What the focus for identification should not be:

- Remember the following are not automatically included:
 - Formally protected areas
 - Small fragmented biodiversity areas which do not promote ecosystem connectivity

STEP 2: VERIFICATION

Once the Environmental Management Department and Catchment Stormwater and River Management colleagues identified and delineated their priority projects based on the criteria provided, each project was screened by nominated officials to ensure projects identified meets the criteria. An area/project must meet all the criteria in the checklist to be considered an EFA.

DSDF Environmental Focus - Criteria										
1. Catalyst for integrated development with cross-cutting benefits			2. Funding, Planning or Investment		3. Priority Area Alignment (Minimum of one required)				Final Selection	Comment
Supports environmental priorities as well as enhance the economic potential and social amenity of the area.	Reduce biophysical risk to communities	Areas under threat from urban development	Dedicated Funding, Planning or Investment (<10 years)	Planning for Funding/ in process or to be applied for.	Development Focus Areas	Urban Support Areas	Destination Places	New DSDF Environmental Focus Area		
					✓	✓	✓	New demarcation required		
								✓		

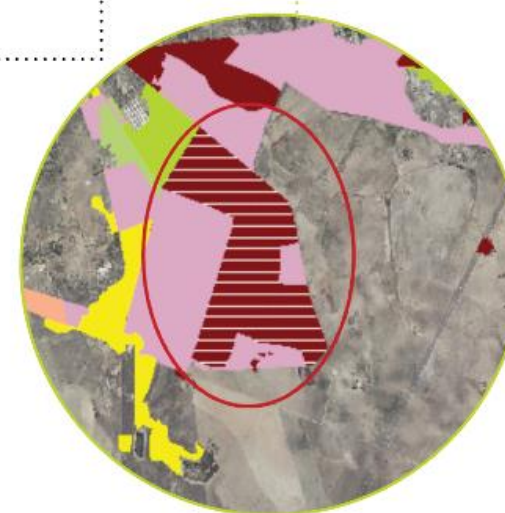
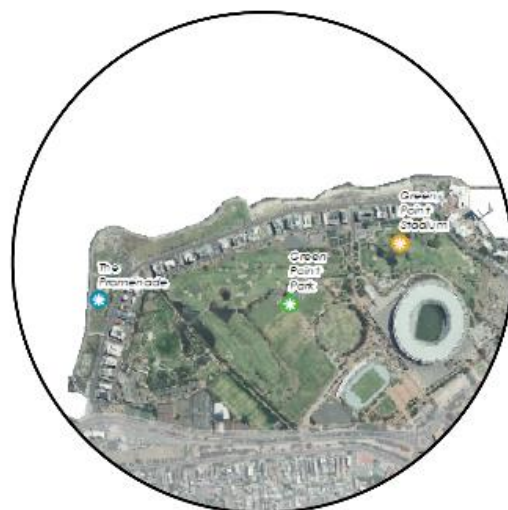


✓
'Urban restructuring' / highest potential transformative impact

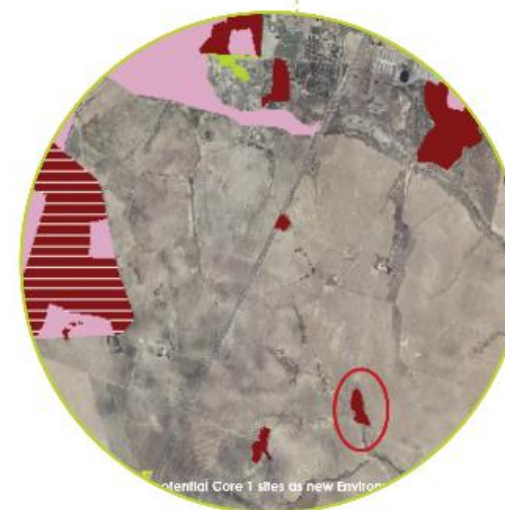
✓
Service Delivery/Built Environment/Socio-economic Need and Vulnerability



✓
Coastal, Natural or Urban Special Places or Potential Destination Place



✓
Larger sites with critical biodiversity that is significantly below the national conservation targets (e.g. Lourensford Alluvium Fynbos currently has 7% coverage compared to national target of 30%). Unconserved prime endemic biodiversity under threat of invasion or degradation (e.g. Cape Flats Sand Fynbos). Biodiversity expansion areas which promote ecosystem connectivity identified for formal protection.



✗
Small fragmented biodiversity areas which do not promote ecosystem connectivity.

		DSDF Environmental Focus - Criteria										
		1. Catalyst for integrated development with cross-cutting benefits			2. Funding, Planning or Investment		3. Priority Area Alignment <i>(Minimum of one required)</i>					
		Supports environmental priorities as well as enhance the economic potential and social amenity of the area.	Reduce biophysical risk to communities	Areas under threat from urban development	Dedicated Funding, Planning or Investment (<10 years)	Planning for Funding/ in process or to be applied for.	Development Focus Areas	Urban Support Areas	Destination Places	New DSDF Environmental Focus Area		
District	Project / Programme Area	Investment in support of environmental priorities (e.g. biodiversity gains, water conservation, reduce urban heat, promote environmental awareness) with the ability to enhance the economic potential and social amenity of the area by adding value in terms of the liveability and quality of the public realm. Examples below include the Adderley Street Fountain Precinct and the Trafalgar Park LUW projects.	Requires mitigation through environmental operations or capital investment to reduce vulnerability of urban support areas (USAs) and maintain the latent potential of DFAs. Example below includes the False Bay nature reserve where land invasions have resulted in vulnerable communities living within landfill buffer zone.	Requires operational maintenance and enforcement to ensure a compact city and facilitate long term sustainability (i.e. climate change mitigation and adaptation, national conservation targets). Examples noted below include the Wolfgat and False Bay nature reserves.	Within the 3-5 year MTREF	Within 5-10 year IDP and DSDF Lifespan	'Urban restructuring' /highest potential transformative impact	Service Delivery/Built Environment/Socio-economic Need and Vulnerability	Coastal, Natural or Urban Special Places or Potential Destination Place	Areas with critical environmental significance (in terms of national conservation targets) and consolidation potential outside of formally protected areas not aligned with DFAs and USAs, preferably state-owned (i.e. municipal, provincial, national). <i>Please refer to Sheet 2 for criteria to consider.</i>	Final Selection	Justification / notes / other
Blaauwberg	Protected Areas Expansion Programme			X	X					New demarcation required	X	Corridor connecting Table Bay Nature Reserve to Blaauwberg Nature Reserve
KMPGBD	Wolfgat Nature Reserve			X		X			X		X	Land invasions threatens loss of proclaimed protected area.
Cape Flats	False Bay Nature Reserve Slangetjebos section		X	X		X		Seawinds/Vrygrond			X	Land Invasion extension of Seawinds/Vrygrond USA. Health risk in Coastal Park Landfill buffer zone.
Table Bay	Adderly Street Fountain Precinct	X			X		CBD			X	X	Project in conceptual design. Project a LUW demonstration project, link to Water Sensitive City. Intention to use as a space for education, and highlight water. Potential future destination place. Could assist with potential of the CBD, as potentially place making, would help with urban heat, given proposed landscaping and water.
Table Bay	Trafalgar Park LUW project	X			X		Woodstock				X	Funding to be determined. Will add value to improving the area. About daylighting water, possible climate education possibilities too. LUW demonstration project. Also park of heritage value.

TECHNICAL ANNEXURE 11: LAND USE MODEL 2040 KEY ASSUMPTIONS

11.1. Land Use Model 2040 Key Assumptions:

The purpose of the model is to establish the foundation for long-term (20-year) engineering infrastructure master plan review and associated sector plans to support the implementation of the 2018-Council-approved Municipal Spatial Development Framework (MSDF). The project is a revision of the previous Land Use Model (2013-2032)

The primary informants of the model are:

- The projected demographic growth, estimated to be in the region of 1.7 million additional persons residing within the city of Cape Town at 2040; and
- The inward growth trajectory principles associated with the approved Municipal Spatial Development Framework (MSDF), 2018.

There are two distinct phases within the land use modeling.

- Phase 1 established a credible and evidence-based “base model” i.e. a spatial representation of land use and intensity across the city (2018).
- Phase 2 considers the future spatial allocation of land use and requires a number of assumptions and calculations in order to allocate land use to accommodate the projected population growth i.e. matching people to land uses via “future growth control totals”.

Both phases have utilised residential and non-residential reference groups informed by internal departments. In the case of the non-residential reference group, this included external property experts.

Summary of Phase 1: base model land use informants are illustrated in the table below:

Category	Estimate
2019 Population	4,488,546
2018 Residential Dwellings Units (all) ²	1,401,368
2018 Estimated m ² GLA Non-Residential land use	49,948,051

² Dwellings were estimated using the latest available (2018/2019) formal and informal dwelling data.

Summary of Phase 2: “future growth control totals” informing the LUM’s spatial allocation of land use for 2040 is reflected below:

Category	Unit of Measure	Estimate	
		2013 2032	2020 2040
Population (additional)	Number of people	1,670,000	1,752,000 ³
Residential Dwellings / Households ⁴	Formal and informal, including additional dwelling informal (ADI) ⁵	553,000	590,000
Non-Residential			
Retail	Gross Letable Area (GLA) in m ²	1,000,000	1,008,000
Office		3,500,000	1,420,000
Industrial		4,500,000	3,650,000

Phase 1 – Land Use Status Quo: Assumptions:

- None. Latest available data was used.

Phase 2 – Future Growth Control totals:

The following aspects inform the additional growth in the residential and non-residential land use categories associated with “additional units of Gross Letable Area (GLA).

Phase 2 represents the “unknowns” of the model and is, therefore, informed by principles and consensus regarding anticipated future trends.

11.2. Methodological approach

Nature of growth / supply: The growth is split between formal and informal supply. The City will not be able to “build its way out of” the growth anticipated. The informal nature of 50% of the growth/supply has implications for service delivery, norms and standards and financial sustainability of the city (implications for the long-term financial plan).

Household size and allocation: each dwelling unit represents a single household. Although, the Census trends indicate that household sizes are decreasing across all households and residential markets, a crude assumption was considered in the light

³ Population projections 2017-2040, CCT (2018): total population projection 2040 = 5,8million

⁴ There is an assumption that each dwelling unit represents a single household.

⁵ Accurate, updated information on the number and location of additional informal dwellings (previously referred to as ‘backyards’) remains a challenge.

of the current pandemic crisis that the household size would remain constant. The preliminary assumption was where people are not able to afford units, people may need to rely on living together, thereby assuming a constant, not decreasing, average household size.

Housing demand: does not take housing “backlogs” into consideration. In addition, the 2018 income segmentation is held constant. The projected dwelling unit growth by market segmentation suggests that the demand in subsidy and gap housing markets are significantly higher than the demand in bonded housing.

Residential Land Use Categories / Dwelling Types:

Four dwelling unit classifications were considered. The classifications, assumptions and residential projections are outlined in the table below.

Dwelling Type	Assumption Notes	2020-2040 Totals ⁶	2020-2040 (%)
Formal dwelling	- The historical growth trend shows formal dwellings increasing at a more rapid pace. However, taking the COVID-19 pandemic and the economic impact into consideration, an assumption was considered that a flat line growth of 14 097 dwellings per annum is more realistic. Formal residential growth is expected to be highly impacted as the property and construction industry is expected to contract. - Baseline was sourced from the residential buildings completed.⁷	208,053	35.4%
Additional dwelling formal (ADF)	- ADF is a subset of formal dwelling. - Represent student or granny flats or additional units which were constructed with brick and mortar on single residential erven and fulfill a dual living need (2 or more families per erf). - Baseline of 45 661 additional formal units⁸ determined using the 2018 General Valuation Roll. - It was assumed that the growth of the additional dwelling formal will mimic the growth of formal main dwellings, i.e. flat line growth. - The average annual growth of 4 189 units of number of additional formal dwellings was used to project the ADF growth (sourced from Development Application Management System (DAMS) from 2015 to 2019).	87,973	15%

⁶ These trends at each respective growth per unit were projected to develop the total of 587 405 du over the 20-year period 2020 to 2040 (also aligned to type of du and income).

⁷ (Stats SA, 2020) and WCG (Human Settlements Annual Reports 2011/12 to 2018/19).

⁸ Assumes each additional dwelling formal has one household.

Informal dwelling	• Informal dwelling unit growth was developed from projecting the baseline at the median growth of 4.21% per annum (which was calculated from the growth of actual counts of informal dwelling units from 2011 to 2019) ⁹. • Assumption¹⁰ that this growth rate will decrease at an average of 5% per annum. • Baseline was sourced from actual counts of Areas of Informality counts of 229 918 as at January 2019 and projected to increase to around 397 216 in 2040 (7 967 dwelling units per annum increase). • Informal dwelling growth is expected to show front loading initially and then taper off as these units are replaced by subsidy and gap housing, and Additional Dwellings Informal (ADI) where access to basic services and employment opportunities are higher.	167,298	28,5%
Additional dwelling informal (ADI) (previously referred to as backyarder units constructed out of temporary materials)	• Additional dwelling informal unit growth was projected at the average of 2.1% growth per annum, using the 2012 to 2018 General Household Survey 2018 data. • Baseline of ADI units was determined using an integrated base 2015 data from various City sources and the 2017/2018 Backyard Information project. • ADI unit growth is expected to increase over time by an average of 5 909 dwelling units per annum and is likely to fill the formal supply gap in providing affordable, appropriate and dignified housing solutions, with improved rental housing stock.	124,081	21,1%

Non-Residential Land Use

Three broad land-use classifications were considered. The classifications and assumptions for the non-residential projections are outlined in the table below:

Dwelling Type	Assumption Notes	2020 - 2040 Totals (GFA)
Retail	• Trends suggested that 40% of growth has been within established industrial and office nodes (policy implication and should, in future, be informed by the nodal hierarchy work within the District Plan Review). • Retail a sector under pressure PRIOR to COVID and sales year on year <4% per annum. • Estimated 20% "drop-off": impact of e-retailing disruption to retail sector.	1,008,000

⁹ Informal settlement roof counts, Informal Settlements Department, City of Cape Town.

¹⁰ The rate is expected to decrease, as informal settlements are aimed to be replaced by low cost housing and additional dwelling informal where access to basic services and employment opportunities are higher.

Office	• Estimated 20% "drop-off": impact of permanent Work from Home disruption to office market. • Would need to consider emerging trends in the market segments e.g. increasing trend in favour of decentralised office space (from traditional CBD;	1,420,000
Industrial	• Cycle would infer a "drop" – in any event, in spite of COVID	3,650,000

Generic Non-Residential-Based Assumptions:

- The global, national and regional economic performance (current and forecast) will be major informant of local potential and growth – and the forecast is not good!¹¹
- Historic trendlines (7 years of flat-lined growth) are less useful now given the COVID-10 impacts and technical recession as major generational disruptors.
- Low growth scenario figures were used in calibrating projections – Business as Usual and Low Growth assessments were considered but estimated GFA base on Low Growth scenario.
- Estimates of future demand are based on anticipated changes in the local population, consumer spending, and disruptors – considered in the table below:

Disruptor	Key Points	Potential impact on future Land Use Demand [inferences made from trends]
Fourth Industrial Revolution	• Increased technological advancement/automation • Artificial Intelligence, Internet of Things • Sharing Economy • Online staffing • Peer-to-peer accommodation • Music and video streaming	• Less demand for manufacturing floor space (technological advances) • Less demand for office space (AI) • Less demand for hospitality (Air bnb) • Less demand for retail due to streaming services • Greater demand for warehousing space (servers, e-tailing) and BPO space (support services) • Less demand for agricultural space
Remote Working	• Competition for talent/skills • Company cost-cutting measures • COVID-19 lockdown may entrench remote working in more sectors	• Less demand for office space • Greater demand for co-working office space
Rapid Urbanisation	• Increased densification/congestion • African population growth with high levels of African and domestic migration into Cape Town	• Greater demand: ○ housing and services ○ mixed use buildings ○ retail space • Lower demand per employee for office space

¹¹ Bureau of Economic Research University of Stellenbosch - 2020 Real GDP Projections for 2020 -9,5%; 2021 3,1%; 6-yr average 2019-2024 -1,7%

Climate Change and Resource Scarcity	• De-materialisation • Environmental Awareness • Water scarcity • Electricity supply challenges	• Lower demand for retail space • Greater demand manufacturing (green) in Cape Town • Greater demand for renewable energy generation
Regulatory Environment	• Land reform • Inclusionary housing	• Lower demand for agricultural or manufacturing Land Uses • Lower demand for new developments

TECHNICAL ANNEXURE 12: IMPLEMENTATION MECHANISMS

DRAFT BASELINE REPORT

12.1. Introduction

The District Spatial Development Framework (DSDF) is a medium term plan (developed on a 10 year planning frame) that will guide urban development within the 8 districts of Cape Town. A key objective of the DSDF is to provide clear direction to the form, type and location of new urban development in the district. In parallel the City is developing a recovery plan for Cape Town's economy during and post the COVID-19 pandemic, focusing on ways to enable and facilitate growth in all sectors of the economy.

The purpose of this report is to research, identify, evaluate and recommend implementation tools that can detail the broad proposals of both the DSDF and Recovery Plan and action them in support of Cape Town's economy.

12.2. Problem Statement

There is a long standing misalignment between the City's proposed spatial planning policy directives and private sector led development. The lack of incentives and tools to stimulate the desired type and form of development proposed in the spatial planning policy needed to rehabilitate the disproportionate urban investment that resulted from Apartheid era planning initiatives continue to hamper spatial transformation.

While the full impact and long term consequences of COVID-19, the economic recession, climate change and uncertainty regarding concepts of 'the new normal' remain unclear, broad trends, globally and within Cape Town have become apparent. The impact to various economic sectors differs but sustained or increased unemployment and fiscal constraints are expected. Recession and declines in spending will likely see the collapse of numerous businesses. While there has been a rise of e-commerce and direct-to-consumer business opportunities, brick and mortar retail outlets face dwindling consumer numbers. Remote work and more flexible working patterns are expected to continue for the foreseeable future. These trends have seen an increasing reliance on internet based services. They will likely have an impact on the demand for office space and will likely have broader impacts on the commercial sector as a whole. Spatial implications of this could see a reduction of the primacy of central business districts, with the retail and service sector in residential areas benefiting and further increases to the residential component of the CBD.

These challenges call for a renewed focus on integrated planning around economies, mobility networks, infrastructure and food networks. This also necessitates reviewing the role of the informal economy as an important safety net for those who need to find livelihoods outside of the formal economy, which is especially true in the South African context. Globally, emerging trends regarding the localisation of economies

and interaction patterns re-emphasises the neighbourhood/community scale as an important focus.

12.3. Development targets

The mechanisms investigated in this report will specifically focus on enhancing or supporting sustainable forms of property development linked to various sectors in the economy. Specific property development proposals in DSDFs are currently being refined, each district will include proposals for the following types of development depicted in Figure 9 below.

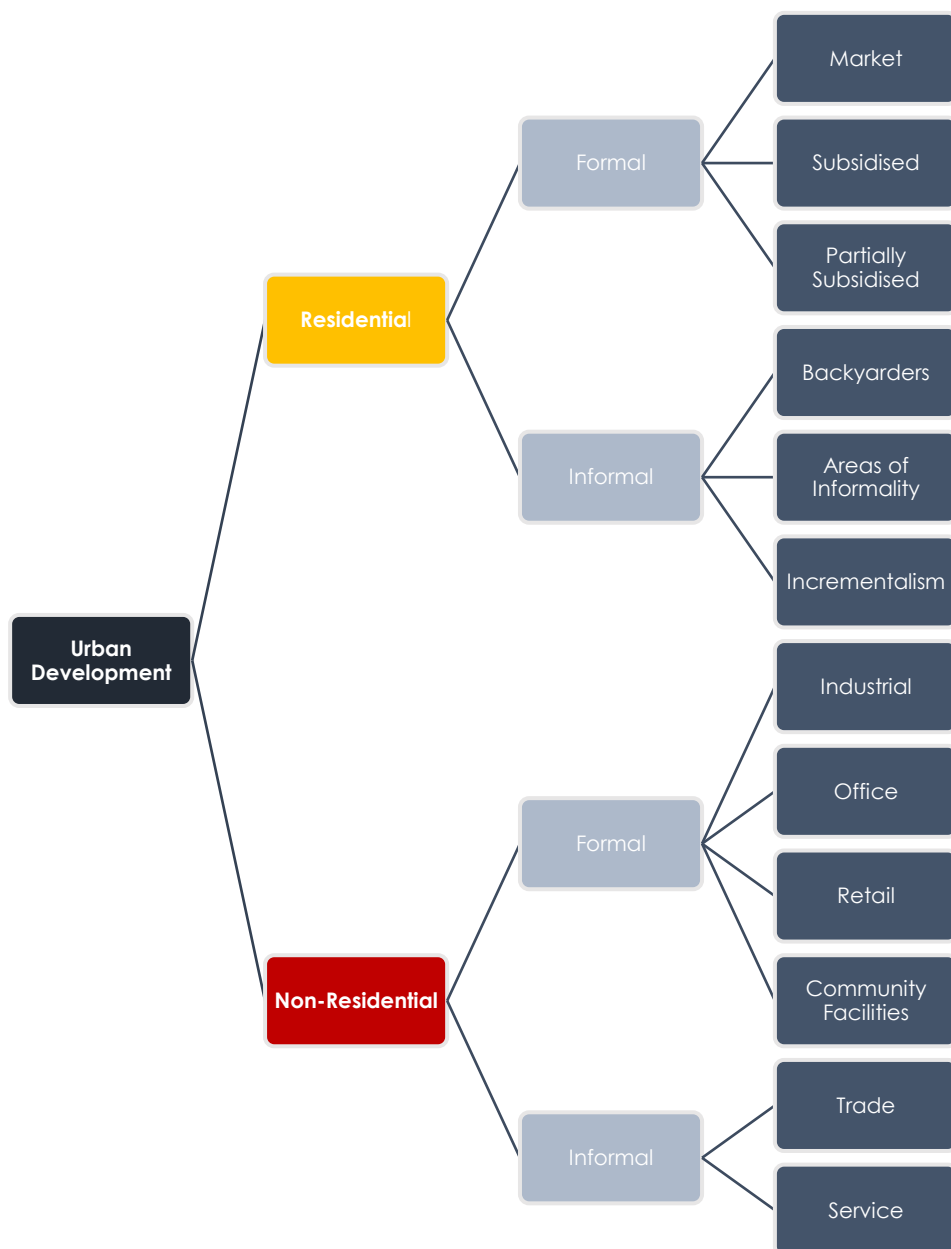


Figure 9: Types of Property Development

12.4. Objectives

1. Identify pragmatic mechanisms that can be implemented within the lifespan of DSDF and support the immediate recovery of the city's economy.
2. To develop a framework to guide the application of the mechanisms at the sub-district and local scale.
3. To develop a monitoring and evaluation tool to monitor the implementation of the DSDF proposals.

12.5. Methodology

The following diagram and description outlines the method used to achieve the objects of this report.

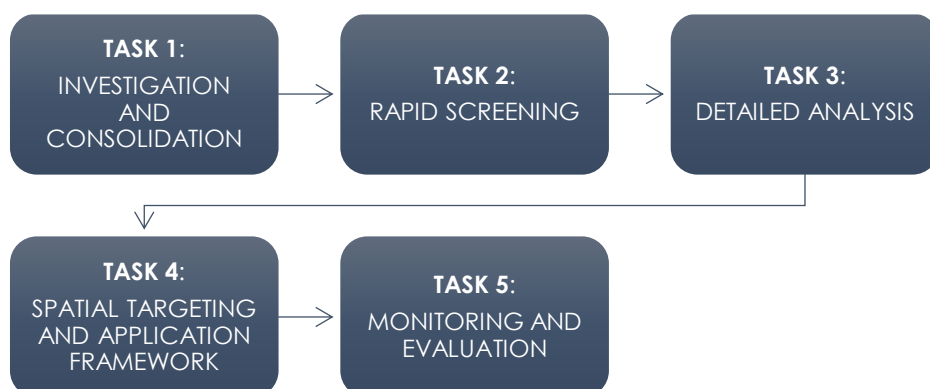


Figure 10: Key Tasks

Task 1: Investigation and Consolidation

The purpose of this task is to identify a list of existing and potential mechanisms through the investigation and consolidation of existing research and policy in the City.

Task 2: Rapid Screening

Based on the findings in Task 1, the list of mechanisms will undergo a rapid screening assessment to determine which can be implemented within short to medium term (5 to 10-year period).

Task 3: Detailed Analysis

Each mechanism that is found to be eligible through the rapid screening criteria will undergo a more detailed analysis to determine the following:

- a. How it works
- b. What are the costs associated with its use
- c. Conditions under which it can be used
- d. Advantages and disadvantages
- e. Case study and/or lessons learnt

Task 4: Spatial Targeting and Application Framework

Development of a spatial targeting tool and framework for applying mechanisms at the local scale, taking into account:

1. Locational Potential
2. Market Performance

Task 5: Monitoring and Evaluation

Development of a monitoring tool to track the implementation of the DSDFs, and measure success and failure during the 5-10-year tenure of the framework.

12.6. Investigation and Consolidation

12.6.1. CURRENT POLICY

a) ECAMP (Economic Areas Management Programme)

This spatial targeted market intelligence tools contained a number of mechanisms and incentives to stimulate positive market responses for commercial development at different stages of the property cycle. Standard incentive packages can involve financial rewards such as discounts, leveraging of city's property assets, rebates, tax holidays and subsidies or they may involve non-financial inducements in the form of exemptions from certain regulation or reporting standards

b) Transit Oriented Development Spatial Framework (TODSF)

The TODSF sets out a framework for guiding targeted densification and mixed use development of a number of key transport nodes within the City. This is to achieve a more sustainable and efficient urban form and movement system, and it involves a number of initiatives, tools and mechanisms to institutionalise this approach to urban development.

c) Investment Incentives Policy

The Investment Incentives Policy aims to attract job-creating investment into Cape Town's economy with a specific focus on making it a preferred business destination. The Investment Incentives Policy will assist and guide the City in managing incentive related activities in an efficient and effective manner so that the desired outcomes can be achieved. The purpose of the Investment Incentives Policy is not to develop a package of subsidies to support unsustainable business models but rather to encourage investment in job-creating enterprises. Furthermore, the Investment Incentives Policy will assist in the targeting of desirable investment in particular spatial locations that require intervention and that can at the same time contribute to improved urban efficiency in terms of the movement of people and goods.

12.6.2. CATEGORISATION OF MECHANISMS

Each mechanism is categorised in terms of their primary objective in supporting the spatial vision and development proposals in line with Spatial Planning Policy. Whilst some may have more than one function, this categorisation focuses on their primary objective. The five categories of mechanisms are described below:

a) Income Generation

Income generation mechanisms enables the City to recover some or all of the value that public infrastructure generates for the private sector and ensure that it retains the maximum value of its assets when leased or disposed to the private sector. The revenue or income generated by these mechanisms can be used to fund the capital and operation cost of public investment projects required to support spatial vision of the City. However, there are challenges regarding the ring-fencing of funds which need investigated with the Finance directorate. It should be noted that this does not exclusively deal with land based financing, rather mechanisms that has a primary objective of generating income.

b) Development Incentives

Development incentive mechanisms aim to stimulate private sector development and leverage public investment in a way the enables the city's development vision contained in spatial planning policy (i.e. using city owned land to incentivise affordable housing or TOD to support its transit investment). They are designed to change the behaviour of agents of the development process or influence their decisions in order to achieve specific outcomes. Incentives must be restricted to agents who meet given criteria such as locating in a TOD precinct and meeting the desired form and composition of land use. Standard incentive packages can involve financial rewards such as discounts, leveraging of city's property assets, rebates, tax holidays and subsidies or they may involve non-financial inducements in the form of exemptions from certain regulation or reporting standards.

c) Institutional

Institutional mechanisms seek to harness the City's operational and legislative capacity as a means of improving the development process. A core facet of this is by identifying and leveraging operational efficiencies as means of improving the implementation of other mechanisms. Institutional mechanisms may also seek to improve vertical and horizontal coherence across government levels as spatial frameworks are aligned with both future and existing local policies, but also across government spheres. While these are typically undertaken within the internal realm of the City, there can be a degree of public-private interfacing as is the case with mechanisms such as City Improvement Districts (CIDs). These are not typically revenue-generating or incentivised approaches.

d) Public Sector Investment

Public investment is a key driver of development within cities across South Africa. Beyond the constitutionally mandated basic services and public infrastructure provision, in certain circumstances **public sector investment is essential** to attracting and leveraging private sector and household investment and unlocking development opportunities in spaces that will contribute to a more efficient, equitable, sustainable and just spatial urban form. These mechanisms are particularly important in areas that face sustained challenges. No developer or investor will elect to build in an undesirable location unless it yields a profitable return on investment or is compensated for its underperformance. Programmes such as MURP and the Precinct Management Model aim to stabilise and address urban decay issues in specific local areas. The CLDP aims to leverage public investment in a long term, comprehensive regeneration process.

e) Development Controls and Dis-incentives

Policy or mechanisms to discourage development in locations that conflict with spatial planning policy. They are designed to curb sprawling development patterns and unsustainable development. These could include increased development contributions, parking levies and planning restrictions (such as an urban edge or a restrictive overlay).

12.6.3. KEY FINDINGS

a) Income Generation

Development Charges – A fee that is imposed by a local government on a new development project to pay for all or a portion of the costs of providing public services to the new development. Fees are imposed upfront as a one-time charge. Requires legislative or policy framework to be in place and staff to administer, negotiate & collect fees.

Tax Increment Financing – TIF enables local government to borrow against future anticipated incremental tax revenues to be generated within a specific geographic area as a result of construction of large-scale improvements. Current property tax revenues when TIF created become the baseline. Additional property tax revenues are deemed the “increment” & captured into a dedicated account. Increment captured for a certain period of time – 10 years or longer – until the identified financing gap associated with the project has been satisfied. Typically, City issues TIF bond, either directly to the public market or by privately placing the bonds directly to investors.

Sale of Development Rights - In an area targeted for redevelopment and where the municipality would like to encourage dense development – provide density bonus (above limits of land use regulations) for a fee. Proceeds from sale of development

rights can be used to fund construction and operational costs of infrastructure or public improvements. Requires a well-designed regulatory framework and enforcement capacity.

TOD redevelopment scheme in an urbanized area – Involves landowners and developer joining together to form one cooperative entity that consolidates multiple land parcels into a single site for redevelopment. Local government modifies zoning codes and increases bulk to facilitate development.

TOD land readjustment on the urban fringe – Landowners pool their land together for reconfiguration and contribute a portion of their land for sale to raise funds to partially fund public infrastructure costs. Can be undertaken by either public or private entity.

Inclusionary Housing – Inclusionary housing is one of many different kinds of housing delivery programs. It is usually a government driven program to promote mixed-income housing delivery through regulations and/or incentives that require or encourage property developers to include a proportion of housing units for low and moderate income households.

b) Development Incentives

PT Zones - PT1 and PT2 zones (short for public transport zones) offer reduced off-street parking requirements for developments in areas already well-served by public transport, in order to encourage the reduction in the number of private transport trips generated to and from that area, as well as to encourage the intensification of land development on the relevant even.

Legislated Exemption Areas - These could include environmental or heritage exemption areas. For example, updating the Environmental Management Frameworks per District to identify areas for exclusion from the requirement to apply for authorisation of specific listed activities as contained in the Environmental Impact Assessment Regulations. Heritage exemptions are provided for in the general protections of the NHRA and areas are identified for investigation for application for exemption of the requirement of S34 and S38.

Overlay Zones - Is a regulatory tool that refers to a zoning, in addition to the base zoning, stipulating the purposes for which land may be used and the development rule which may be more or less restrictive than the base zoning.

Density bonus - Zoning tool that permits developers to increase height and/or bulk above those permitted in terms of the zoning scheme, in exchange for a public or social good. Intended to compensate the developer with additional revenue from sale of additional dwellings to make up for inclusion of below-market units or unprofitable amenities. This tool does not generate direct revenue. It is intended as an in-kind payment in exchange for development of a public good.

Scheduled Public Transport Accessibility Overlay (SPTOA) – Is a Zoning tool, the purpose of which is to make provision for additional land use rights to facilitate small and micro enterprises within the Single Residential (SR) 1 and 2 zoned land units within

the designated scheduled public transport accessibility routes. Through the use of this tool, the City will be setting out principles, procedures and guidelines that will enable the City to support SMMEs, entrepreneurs, and innovators with their incubation, establishment, and development. The tool will guide the process through which entrepreneurs and SMMEs can approach the City for support with identifying business incubation facilities, specifically in relation to City immovable property.

State Land Release Processes – Land release processes are the mechanisms for the handing-over of state land for a variety of purposes. Purposes include the supply of affordable housing, local economic development, stimulating urban renewal, or ensuring sustainable land use. This allows the local state to maintain a stable supply of land while balancing a forecasted demand in line with a suitable inventory. Additionally, land release processes are used as a revenue generating mechanism for local authorities.

Urban Development Zones (UDZs) – the UDZ is a National Treasury tax incentive administered by the municipality that aims to address urban decay in South Africa's inner cities by promoting private sector-led investment in commercial and residential developments.

City-owned land disposal or lease – Local government disposes of property and transfers development rights to a private developer for economic development purposes:

- Land for a fee - sale or lease at **market value consideration**
- Land as in-kind payment for infrastructure – MFMA/MATR consideration
- Land as equity for development (Atlantis)

Local government may seek to maximise fair market value of the land or maximise other policy goals (e.g. affordable housing). Municipality & developer negotiate the land disposition deal structure with the goal of aligning public and private interests

The acquisition or release of land by the City is an important mechanism for development purposes. Improving process efficiencies would increase the City's ability to facilitate development either through internal mechanisms or through private entities.

Tax Abatement – A reduction or exemption from taxes granted by government for a specific period, usually to encourage investment in locations with lower demand (e.g. the UDZ in SA). Benefits of the tax abatement get passed onto subsequent owners who purchase the property, thereby incentivising end users to relocate to an area that they may not otherwise locate in. Can be set up in designated neighbourhoods where the city is trying to incentivise development or on project-by-project basis if that project advances certain policy goals e.g. job creation.

Proactive Rezoning/ Upzoning – Proactive rezoning is the process where a municipality, of its own accord, changes the existing zoning of land parcels in its jurisdiction. A municipality may do this for many reasons, but generally the aim is to

encourage development in a specific area and/or to control the nature of that development

c) Public Sector Investment

Mayoral Urban Renewal Programme (MURPs) – this programme aims to uplift areas that have been identified as neglected and dysfunctional through the maintenance of public infrastructure and facilities in order to stabilise areas and provide a platform for more effective public and private investment and management.

Catalytic Land and Development Pipeline (CLDP) – include public municipal, public non-municipal, public-private partnerships and private development projects needing to be implemented within a priority precinct of a specific spatial targeted area to achieve specific strategic objectives.

Special Economic Zone (SEZs) – geographically designated areas of a country set aside for specifically targeted economic activities, supported through special arrangements (that may include laws) and systems that are often different from those that apply in the rest of the country. SEZs are categorized as either Industrial Development Zones, Free Port, Free Trade Zones or Sector Development Zones.

Land Banking and Assembly - Land banking is the practice of purchasing land with the intent to hold onto it until such time as it is useful or profitable to release the land for development purposes. Typically, it is associated with accessing land for public purposes such as for housing, managing land markets and directing land speculation. This implies the state purchasing land cheaply with an identified future use of the land to influence the surrounding pattern of development.

d) Non-Fiscal Incentives

Other non-fiscal incentives: including regulatory and administrative concessions; and subsidised or reduced service costs. For instance, streamlining the land use application process for development proposals in specific areas or in exchange for a public or social good.

12.7. Rapid Screening

This step in the process is to understand the viability of implementing development mechanisms in Cape Town using a rapid screening approach to narrow the scope for the detailed analysis. This approach will investigate potential development mechanisms based on literature and approved policy documentation in the City, and evaluate, at a high level, their ability to be implemented by the City using the criteria described below.

12.7.1. CRITERIA

Each mechanism is evaluated based on the following four criteria:

- A. MARKET SENSITIVITY:** the level of sensitivity the mechanism is to market conditions and the ability of the mechanism to stimulate or incentivise positive market conditions. To this end the following questions were asked:
 - How sensitive is the tool to market conditions?
 - Are local market conditions conducive to the use of this tool?

- B. TIMEFRAMES TO IMPLEMENT:** The length of time required to implement or make use of the mechanisms. Ideally the aim of this task is to prioritise mechanisms for the DSDF and Recovery Plan in the short and medium term to support urban development in sustainable locations in Cape Town. To this end the following questions were asked:
 - How long will it take to put into place or will the implementation or use of this mechanisms require significant policy changes, public participation, etc.?
 - Are there any processes currently in place to regularise the use of this mechanisms?

- C. COST / RISK TO CITY:** the potential negative impact of the mechanism to city and its residents. This could include and financial, environmental or social risks. To this end we asked the following questions:
 - What are the risks?
 - Can the risk be easily prevented or mitigated?

- D. CITY'S CAPACITY TO IMPLEMENT:** to determine if the mechanism can be embedded or accommodated within the City's current administrative processes. To this end we asked the following questions:
 - Can the mechanism be implemented and managed by current City line departments or branches?
 - Does the mechanism require external management?

12.7.2. SCORING METHOD:

The rapid screening approach utilises a straightforward scoring tool to assign a weighting to the screened mechanisms. Using the criteria described in the previous section, the scoring tool allocates points to the various mechanisms out of a possible score of 3 – see Table 15 below. The questions posed in the previous section served as guiding tools for approaching how to conceptualise of allocating a score to the mechanisms.

In measuring market readiness, evaluations of the mechanisms are made based on perceived reactions the market would have to the implementation of the tools. This criterion served to analyse whether mechanisms would act as an enabler for the market and serve to incentivise development.

Appropriate considerations are made towards the time needed to implement various mechanisms given the urgent call for a clear economic recovery path. Those mechanisms implementable within a five-year period are highest ranked, and thus, given a score of three. The mechanisms which operate in a period of between five and ten years are scored a two and those taking longer than ten years to implement are given a score of one. The analysis will forego mechanisms which fall into the medium to long-term timeframes given the **District Plans' 5 – 10 -year lifespan**.

The economic downturn has also affected the capital capabilities of the City. As such, it is necessary to evaluate the costs borne by the City in implementing the mechanisms. These costs extend beyond the financial sphere, and it is also necessary to be cognisant of the social, political and environmental risks that are posed by the introduction of some stimulus tools.

Finally, the last scope of evaluation was the capacity of the City to implement the chosen mechanisms. This posed the question of whether external expertise is needed, or whether the internal City departments can implement and manage the mechanisms. Mechanisms which required no external input and could all be managed in-house and those which the City has some capacity for are given a score of three and two respectively. In cases where there is no internal capacity to manage and implement mechanisms, thus requiring external management, are scored the lowest, at a one.

Table 15: Scoring Matrix

MARKET SENSITIVITY	TIMEFRAMES TO IMPLEMENT	COST / RISK TO CITY	CITY'S CAPACITY TO IMPLEMENT
High 3	<5 years 3	Low 3	Capacity Available 3
Medium 2	5-10 years 2	Medium 2	Some Capacity 2
Low 1	>10 years 1	High 1	No Internal Capacity 1

CUMULATIVE SCORE GUIDE		
4 - 6	7 - 9	10 - 12
Low Implementation	Medium Implementation	High Implementation

Following the application of the scoring tool, the mechanisms assessed will receive a score out of 12. This will guide the approach to the potential applicability and pragmatisms of the mechanisms in relation to the District Plans and COVID-19 economic recovery strategy.

Three ranges of scoring are used to evaluate the individual scores of each mechanism – see cumulative score guide in Table 15 above. Those receiving a score between 4 to 6 are deemed to have a low implementation potential. Scoring of 7 to 9 are considered in the mid-range, and those scoring between 10 to 12 have the highest potential of effective implementation.

12.7.3. RAPID SCREENING OUTPUTS

From the rapid screening process, a number of mechanisms were identified which meet the criteria suitable for the inclusion into the District Plans. The primary criterion for exclusion from this list were those tools whose timeframes fall outside of the 5 – 10-year lifespan of the District SDFs. The mechanism listed below will be taken forward into a detailed analysis, following which appropriate spatial targeting will occur. As mentioned, the rapid screening matrix provides further input into the motivation for the scoring decisions taking. The list of suitable mechanisms are as follows:

Development Incentives

- Discounted Development Charges
- Discounted or Exempted Development Application Fees plan application fees
- Discounted Electricity Tariffs
- PT Zones
- Legislated Exempted Areas
- Incentive Overlay Zones
- Density Bonuses
- Inclusionary Housing Policy
- Scheduled Public Transport Accessibility Overlay (SPTAO) Zone
- Proactive Rezoning/ Upzoning
- Urban Development Zones
- Urban Redevelopment Scheme
- Efficient Land Use Applications
- Small-Scale Rental Unit Incentives
- Tax Abatement

Income Generation

- Impact Fees (Development Charges)
- Land Readjustment Scheme
- City-owned Land Disposals

Institutional

- Streamlined Land Use Applications
- Enhanced Process of Land Release and Acquisition
- Special Rating Areas/City Improvement Districts (CIDs)

Public Sector Investment

- Catalytic Land Development Programme
- Land Acquisition including Land Banking and Assembly
- Precinct Management Model
- Mayoral Urban Regeneration Programmes (MURPs)

12.8. Detailed Analysis

The mechanisms and tools as described in **Section 12** above are those that are seen to have a degree of successful implementation during the timeframe of the District Plans based on the rapid screening analysis, and these were brought forward for a more thorough analysis. The detailed analysis of the above mechanisms took into account a number of factors in order to extend the base methodology applied during the rapid screening phase.

At the outset of the detailed analysis, a quick summary of the Focus Area, Project Types and Goals of the specific mechanism are provided. This is a breakdown of the suitable geographic areas in which the mechanism may apply, the most applicable types of development and the intended outcome of its use.

Following this, the detailed analysis explores the way in which the mechanism works. This is a step by step analysis of the functioning of the mechanism and how it intends to motivate development or investment within the City.

The costs and risks of each mechanism are expanded upon. This would need to go beyond the financial costs associated with the mechanism and consider the costs that could result in the social and environmental spheres as well as potential opportunity costs that are not immediately tangible.

The preconditions for use of each mechanism is included as part of the detailed analysis. Examples of necessary preconditions for successful implementation include appropriate market conditions, availability of land, the cost of land, and the capacity of the municipality to manage mechanisms from an institutional process standpoint.

In addition to the requisite preconditions for the use of the mechanism, the timing of the mechanisms is also necessary to explore. This refers to the time at which the mechanism is triggered i.e. before or after development, or when to remove the mechanism.

In cases where a mechanism has not yet been approved, a description of the process to approve the mechanism was defined with a timeline to ensure that the approval can be done within the time period of the DSDFs. In addition, a description of how an applicant would apply for the mechanism is also included in this section of the detailed analysis.

If applicable, a case study of the use of a mechanism would also be inserted to display its use in pragmatic terms. This section also provided an opportunity to explore the shortcomings of mechanisms to indicate the potential for improvements in their intended use.

Lastly, the detailed analysis provides a section for the geographic targeting of the mechanisms using the relevant mapping resources. This should guide planners and development practitioners as to the specific areas in which investment incentives and implementation mechanisms apply.

12.8.1 AVAILABLE MECHANISMS

The mechanisms described in this section are approved and available to the City, prospective development agents and property owners in Cape Town (the table below provides a road map to various policies or legislation that permits the use of said mechanisms).

Table 16: Available mechanisms and Policy Reference

Mechanism	Policy Reference
DEVELOPMENT INCENTIVES	
Discounted Development Contributions	City of Cape Town Investment Incentives Policy 2018
Development Application Fee Waivers	City of Cape Town Investment Incentives Policy 2018
Discounted Electricity Tariffs	City of Cape Town Investment Incentives Policy 2018
PT Zones	City of Cape Town Municipal Planning By-Law 2015, Parking Policy for the City of Cape Town 2014 S19.1.1 of Cape Town Zoning Scheme 2012
Urban Development Zones (UDZs)	Income Tax Act (No 58 of 1962) Revenues Laws Amendment Act (No 45 of 2003)
INCOME GENERATION	
Development Contributions	Development Charges Policy for Engineering Services for the City of Cape Town 2014
Land Disposals & Lease	Municipal Finance Management Act 2003, Municipal Asset Transfer Regulations 2008, Management of Certain of the City of Cape Town's Immovable Property Policy 2010
INSTITUTIONAL	
Streamlined Land Use Application Process	City of Cape Town Investment Incentives Policy 2018 S. 99 of City of Cape Town Municipal Planning By-Law 2015
Special Rating Areas	Special Rating Area By-Law 2009
PUBLIC SECTOR INVESTMENT	
Catalytic Land Development Pipeline	City of Cape Town IDP National Treasury's Catalytic Land Development Guideline.
Mayoral Urban Regeneration Programme (MURP):	City of Cape Town IDP City of Cape Town Resilience Strategy 2019
Precinct Management Model	City of Cape Town Resilience Strategy 2019
Land Acquisitions and Disposals	Municipal Finance Management Act 2003, Municipal Asset Transfer Regulations 2008, Management of Certain of the City of Cape Town's Immovable Property Policy 2010 Immovable Property Asset Management Policy 2015

12.8.1.1. Development Incentive Mechanisms

Discounted Development Charges (DCs)

Focus Area:

- Manufacturing within 6 defined geographic areas. This includes the broad manufacturing sector OR priority manufacturing sectors being:
 - Agro-processing
 - Green technology
 - Electronics and electrical engineering
 - Clothing and textiles.
- Priority tertiary sector industries are defined by the City's economic research and strategic documents including the Integrated Development Plan, the Social Development Strategy, the Inclusive Economic Growth Strategy and Project Camissa. These industries include:
 - Business Process Outsourcing (BPO),
 - Information and Communication Technology (ICT),
 - Tourism,
 - Film Industry.

Project Type:

- For private development

Goal:

- To attract job-creating investment into Cape Town's economy with a specific focus on making it a preferred business destination.
- Incentivise economic development

a) How it works:

Applies in respect of civil DCs where enhanced development rights are granted

- i) The DC debt will still be calculated and Acknowledgment of Debt (AoD) signed and payable as per normal;
- ii) A maximum of R1 million of the DC owed by the applicant will be deferred for 24 months and written off on verification that employment targets are met for two years after the start of the production process. This incentive does not apply in respect to water related DC's.
- iii) Incentive only valid for 24 months from date of approval of application for investment incentives.
- iv) The incentive will only be available for a specified number of applicants on a 'first come first serve' and a 'use it or lose' it basis.
- v) Subject to National Treasury guidelines as outlined in the Policy Framework for Municipal Development Charges.

b) Costs or Risks

Loss of income to the City as development charges are the most important form of capital contribution raised by the CCT to pay for infrastructure. However, the current Investment Incentives Policy provides framework where this financial mechanism is administered in a targeted and equitable way to ensure that the main beneficiaries of infrastructure make an appropriate and fair contribution to that cost without unduly burdening the city's ratepayers and providing wider economic benefits to the public in the form of job creation.

Each geographic area may be subject to a limitation on the number of businesses that may access the financial incentives. The rationale for this limitation is to provide a mechanism for the active management of the fiscal impact of the financial incentive as well as being able to adapt to shifting development objectives across each geographic area.

c) Preconditions (When to use it)

- i) Targets areas with clear potential for economic growth but which is currently underperforming/lagging. This will be determined by the market potential and performance scores as revealed in the City's Economic Areas Management Programme (ECAMP). However, this is limited to manufacturing and tertiary sectors.
- ii) Financial incentives for manufacturing sector investments are only available in six industrial nodes within the City. These nodes have been selected based on an evaluation of their current performance, long-term growth potential and suitability for incentives. The designation of spatially targeted geographic areas for incentives will be approved by Council from time to time. The areas where the manufacturing sector incentives currently apply are:
 - (a) Atlantis Industria
 - (b) Triangle Farm
 - (c) Parow Industria
 - (d) Sacks Circle
 - (e) Landsdowne Industrial (known as Philippi North in ECAMP)
 - (f) Elsies River
- iii) Priority tertiary sector industries are defined by the City's economic research and strategic documents including the Integrated Development Plan, the Social Development Strategy, the Inclusive Economic Growth Strategy and Project Camissa. These industries include:
 - (g) Business Process Outsourcing (BPO),
 - (h) Information and Communication Technology (ICT),
 - (i) Tourism,
 - (j) Film Industry.

d) Qualifying Criteria

The following criteria must be met in order for investments to qualify for the manufacturing sectors incentives:

- i) The investment must constitute a new investment or expansion of an existing investment in the area, but cannot be a relocation of an existing business or part thereof within the municipal boundaries of Cape Town
- ii) Proposed investment or expansion must be within either the broad manufacturing sector OR priority manufacturing sectors being:
 - (1) Agro-processing
 - (2) Green technology
 - (3) Electronics and electrical engineering
 - (4) Clothing and textiles
- iii) The minimum thresholds to qualify for the incentives are:
 - (1) In the broad manufacturing sector: a minimum of 50 new permanent full time jobs within two years
 - (2) In the priority manufacturing sectors: a minimum of 20 new permanent full time jobs within two years
- iv) The investment or expansion must be located in the spatially areas as approved by Council.

Incentives for investments in tertiary sector industries will be subject to the following criteria:

- i) The investment must constitute a new investment or expansion of an existing investment in the area, and cannot be a relocation of an existing business or part thereof within the municipal boundaries of Cape Town
- ii) The investment must be in one of the City's priority tertiary sector industries as informed by the City's economic research and strategic documents.
- iii) The investment or expansion must create a minimum of 20 new full time jobs within 2 years.
- iv) The strategic or catalytic importance of the investment to Cape Town's economy.
- v) The capital value of investment into Cape Town over a ten-year time horizon must reach a minimum amount of R100 million.
- vi) The investment support for entrepreneurs and SMME's within the sector aligned with the enterprise and supplier development element as described in the Amended Codes of Good Practice

e) Timing

This incentive might change over the lifecycle of an area: The City's ECAMP work has demonstrated that economic areas move through cycles and that different interventions are appropriate at different stages in an areas' lifecycle. This means that an area selected for incentives may lose that Investment Incentives Policy

Final Approved May 2018 status in the future. Conversely, areas not selected initially may be targeted at a later stage as its context and performance changes.

f) Approval and Application process

i) Approval

Approved as part of City's Investment Incentives Policy

ii) Application Process

When an applicant is interested in this incentive or any other incentive offered in the City's Investment Incentive Policy, an initial meeting to be held between the investor and officials from the Investment Facilitation Unit (IFU) for the purpose of clarifying the requirements and scope of the investment incentive scheme and providing any additional information relating to:

- (1) Incentives available,
- (2) Qualifying and performance criteria,
- (3) Information required from the investor,
- (4) the administrative process and timeframes going forward.

Eligibility for the manufacturing sector incentives is based on the qualifying criteria and will be confirmed in an Incentive confirmation letter that will be signed by the Executive Director: Economic Opportunities and Asset Management

Eligibility for tertiary sector development will require approval by Council. Once approved by Council the investor will be informed by the IFU of the outcome in an Incentive confirmation letter that will be signed by the ED. This letter will also list the incentives that the investor is eligible for and any special conditions imposed by Council.

Development Charges (DC) are levied where enhanced land use rights are required. A calculation of the DC contribution required will be made as part of the land use application.

The incentive confirmation letter must accompany the land use application and a calculation of the DC costs will reflect the deferred and non-deferred portions. An AoD (covering the deferred portion) will be signed by the investor prior to the land use decision on the related application. The varied standard AoD and suretyship template will be used for this purpose (Annexure E). Suretyship will only be required where the investor/developer is not the land owner (i.e. leasing the premises).

DC debt would become payable as a once off occurrence. The deferral period is considered a maximum of 24 months from the date of payment of the non-deferred portion of the DC debt. The IFU will record the above date and remind the investor of the compliance requirements two (2) months prior to the expiration of the 24-month deferral period.

The Area Manager: Roads Infrastructure and Management must advise the Revenue department (Head: Debtors Contact Centre) when the payment of the non-deferred

DC debt occurs. Upon receipt of such notice, the Revenue department would record the R1m (or lesser amount as may be the case) as deferred debt in the accounting system with an activation (or call-up) date of 24 months hence. As is the normal practice with outstanding DCs payable, a block will be put on the system by Finance to prevent transfer without settlement of such deferred debt.

In the case of asset ownership change prior to incentive realisation date, the investor having taken up the DC debt incentive and signed the applicable AoD will be required to settle the deferred debt immediately or provide proof that the required number of jobs have been created.

A summary of the application process is depicted in Figure 11 below. Full details can be found in CCT Standard Operational Framework for the Administration of Investment Incentives (2019).

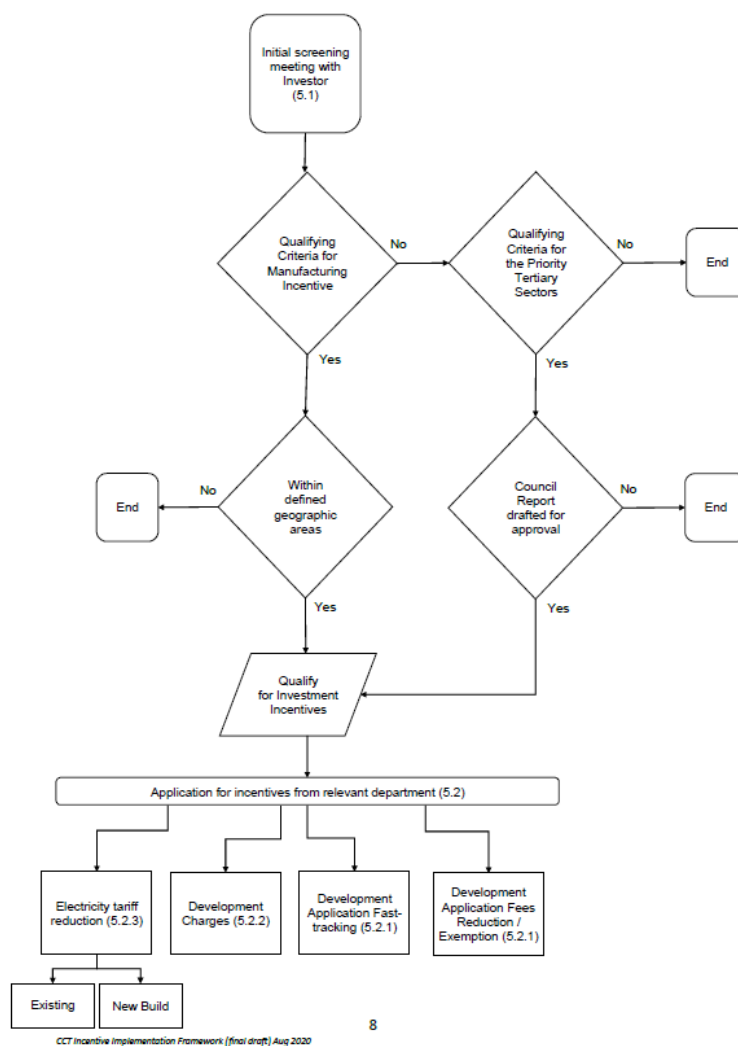


Figure 11: Application Process

g) Advantages and Disadvantages

Advantages	Disadvantages
• Help mitigates financial risk to developer and marginally improves overall project feasibility. • Currently regulated within the City's Investment Incentive Policy	• At the moment this incentive is only applicable to two economic sectors and only six geographic areas in Cape Town. However, this is done to mitigate severe financial risk to the City. •

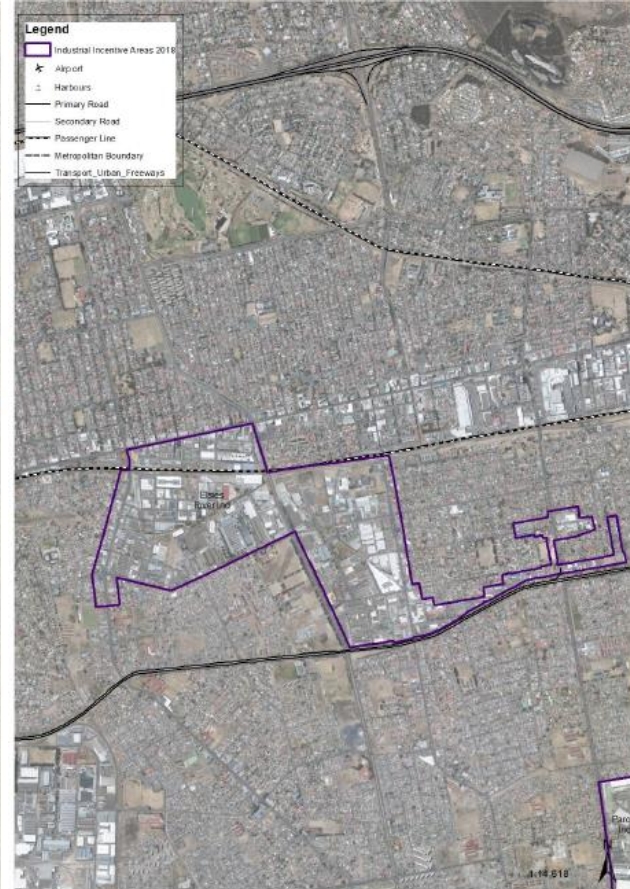
h) Targeted Areas

The following maps defined geographic areas for manufacturing incentives:

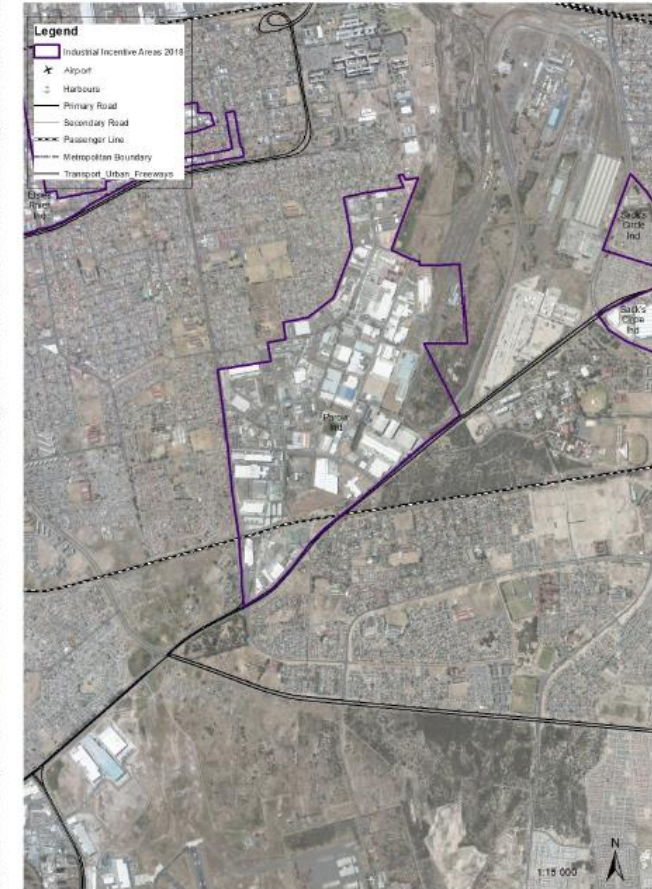
Atlantis Industrial Area



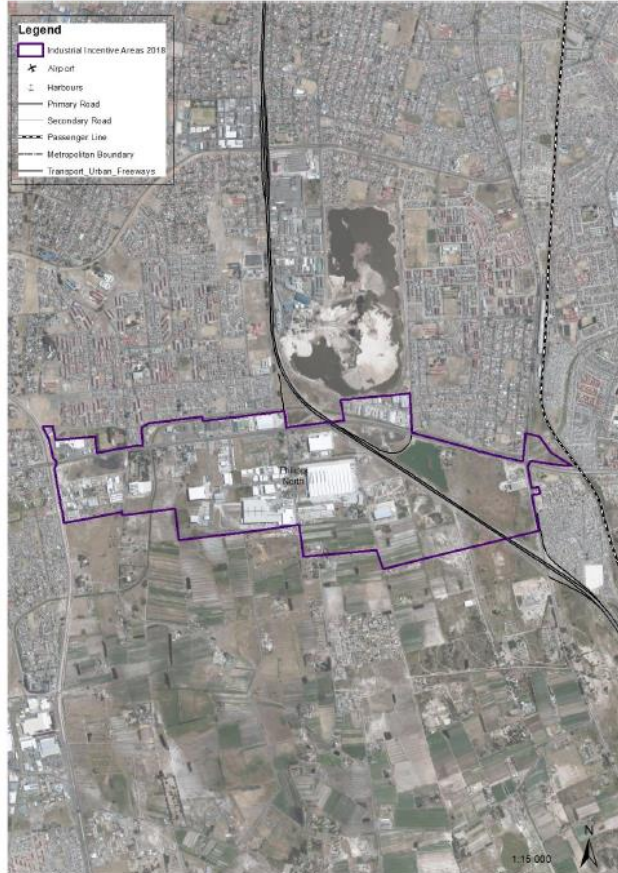
Elsies River



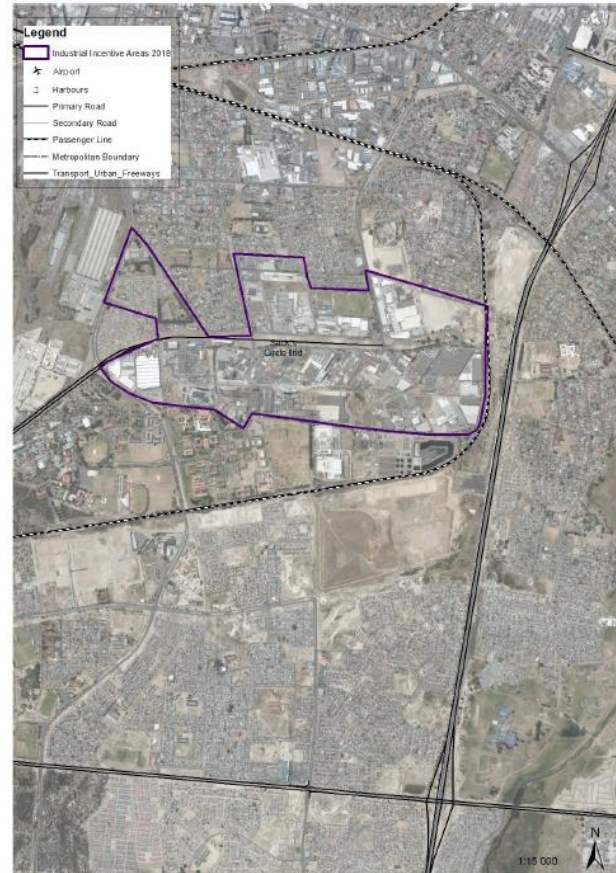
Parow Industria



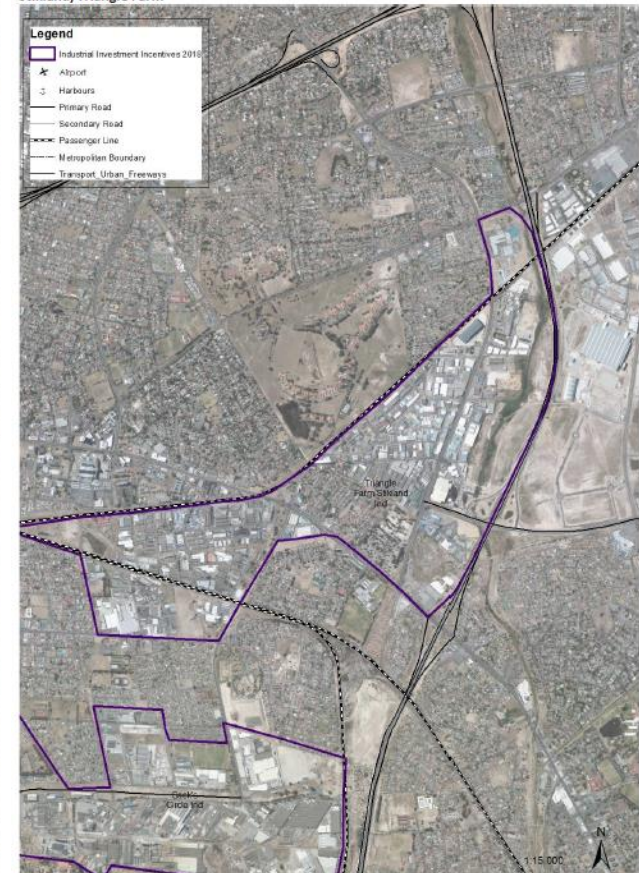
Philippi North



Sacks Circle



Stikland/Triangle Farm



Exemption of Development Application Fees

Focus Area:

- Manufacturing within 6 defined geographic areas. This includes the broad manufacturing sector OR priority manufacturing sectors being:
 - Agro-processing
 - Green technology
 - Electronics and electrical engineering
 - Clothing and textiles.
- Priority tertiary sector industries are defined by the City's economic research and strategic documents including the Integrated Development Plan, the Social Development Strategy, the Inclusive Economic Growth Strategy and Project Camissa. These industries include:
 - Business Process Outsourcing (BPO),
 - Information and Communication Technology (ICT),
 - Tourism,
 - Film Industry.

Project Type:

- For private development

Goal:

- To attract job-creating investment into Cape Town's economy with a specific focus on making it a preferred business destination.
- Incentivise economic development

a) How it works:

Full exemption for both land use and building plan application fees, only in areas designated by Council. This applies to all manufacturing investments in the identified spatial nodes as well as tertiary sector investments approved by Council.

b) Costs or Risks

Loss of income to the City in form of application fees, however the wider economic benefits of employment and additional rates to the city makes up for said loss.

Each geographic area may be subject to a limitation on the number of businesses that may access the financial incentives. The rationale for this limitation is to provide a mechanism for the active management of the fiscal impact of the financial incentive as well as being able to adapt to shifting development objectives across each geographic area.

c) Preconditions (When to use it)

- i) Targets areas with clear potential for economic growth but which is currently underperforming/lagging. This will be determined by the market potential and performance scores as revealed in the City's Economic Areas

Management Programme (ECAMP). However, this is limited to manufacturing and tertiary sectors.

- ii) Financial incentives for manufacturing sector investments are only available in six industrial nodes within the City. These nodes have been selected based on an evaluation of their current performance, long-term growth potential and suitability for incentives. The designation of spatially targeted geographic areas for incentives will be approved by Council from time to time. The areas where the manufacturing sector incentives currently apply are:
 - (k) Atlantis Industria
 - (l) Triangle Farm
 - (m) Parow Industria
 - (n) Sacks Circle
 - (o) Landsdowne Industrial (known as Philippi North in ECAMP)
 - (p) Elsie's River
- iii) Priority tertiary sector industries are defined by the City's economic research and strategic documents including the Integrated Development Plan, the Social Development Strategy, the Inclusive Economic Growth Strategy and Project Camissa. These industries include:
 - (q) Business Process Outsourcing (BPO),
 - (r) Information and Communication Technology (ICT),
 - (s) Tourism,
 - (t) Film Industry.

d) Qualifying Criteria

The following criteria must be met in order for investments to qualify for the manufacturing sectors incentives:

- i) The investment must constitute a new investment or expansion of an existing investment in the area, but cannot be a relocation of an existing business or part thereof within the municipal boundaries of Cape Town
- ii) Proposed investment or expansion must be within either the broad manufacturing sector OR priority manufacturing sectors being:
 - (5) Agro-processing
 - (6) Green technology
 - (7) Electronics and electrical engineering
 - (8) Clothing and textiles
- iii) The minimum thresholds to qualify for the incentives are:
 - (3) In the broad manufacturing sector: a minimum of 50 new permanent full time jobs within two years
 - (4) In the priority manufacturing sectors: a minimum of 20 new permanent full time jobs within two years
- iv) The investment or expansion must be located in the spatially areas as approved by Council.

Incentives for investments in tertiary sector industries will be subject to the following criteria:

- vii) The investment must constitute a new investment or expansion of an existing investment in the area, and cannot be a relocation of an existing business or part thereof within the municipal boundaries of Cape Town
- viii) The investment must be in one of the City's priority tertiary sector industries as informed by the City's economic research and strategic documents.
- ix) The investment or expansion must create a minimum of 20 new full time jobs within 2 years.
- x) The strategic or catalytic importance of the investment to Cape Town's economy.
- xi) The capital value of investment into Cape Town over a ten-year time horizon must reach a minimum amount of R100 million.
- xii) The investment support for entrepreneurs and SMME's within the sector aligned with the enterprise and supplier development element as described in the Amended Codes of Good Practice

e) Timing

This incentive might change over the lifecycle of an area: The City's ECAMP work has demonstrated that economic areas move through cycles and that different interventions are appropriate at different stages in an areas' lifecycle. This means that an area selected for incentives may lose that Investment Incentives Policy Final Approved May 2018 status in the future. Conversely, areas not selected initially may be targeted at a later stage as its context and performance changes.

f) Approval and Application process (where relevant)

i) Approval

Approved as part of City's Investment Incentives Policy

ii) Application Process

When an applicant is interested in this incentive or any other incentive offered in the City's Investment Incentive Policy, an initial meeting to be held between the investor and officials from the Investment Facilitation Unit (IFU) for the purpose of clarifying the requirements and scope of the investment incentive scheme and providing any additional information relating to:

- (5) Incentives available,
- (6) Qualifying and performance criteria,
- (7) Information required from the investor,
- (8) the administrative process and timeframes going forward.

Eligibility for the manufacturing sector incentives is based on the qualifying criteria and will be confirmed in an Incentive confirmation letter that will be signed by the Executive Director: Economic Opportunities and Asset Management

Eligibility for tertiary sector development will require approval by Council. Once approved by Council the investor will be informed by the IFU of the outcome in an Incentive confirmation letter that will be signed by the ED. This letter will also list the incentives that the investor is eligible for and any special conditions imposed by Council.

In order to take up the development application fee waivers and fast tracking incentives the investor will submit their incentive confirmation letter together with their development applications. Both must be submitted electronically via the Development Application Management System (DAMS) portal.

Once submitted the client must alert the IFU who will in turn alert the Customer Interface official and request the waiver of the submission fee¹. Once the fee is waived the application can be processed further within DAMS. The Customer Interface office will keep record of the value of the waived application fees and send this to the E&I Department for quarterly uptake capturing purposes.

A summary of the application process is depicted in Figure 12 below. Full details can be found in CCT Standard Operational Framework for the Administration of Investment Incentives (2019).

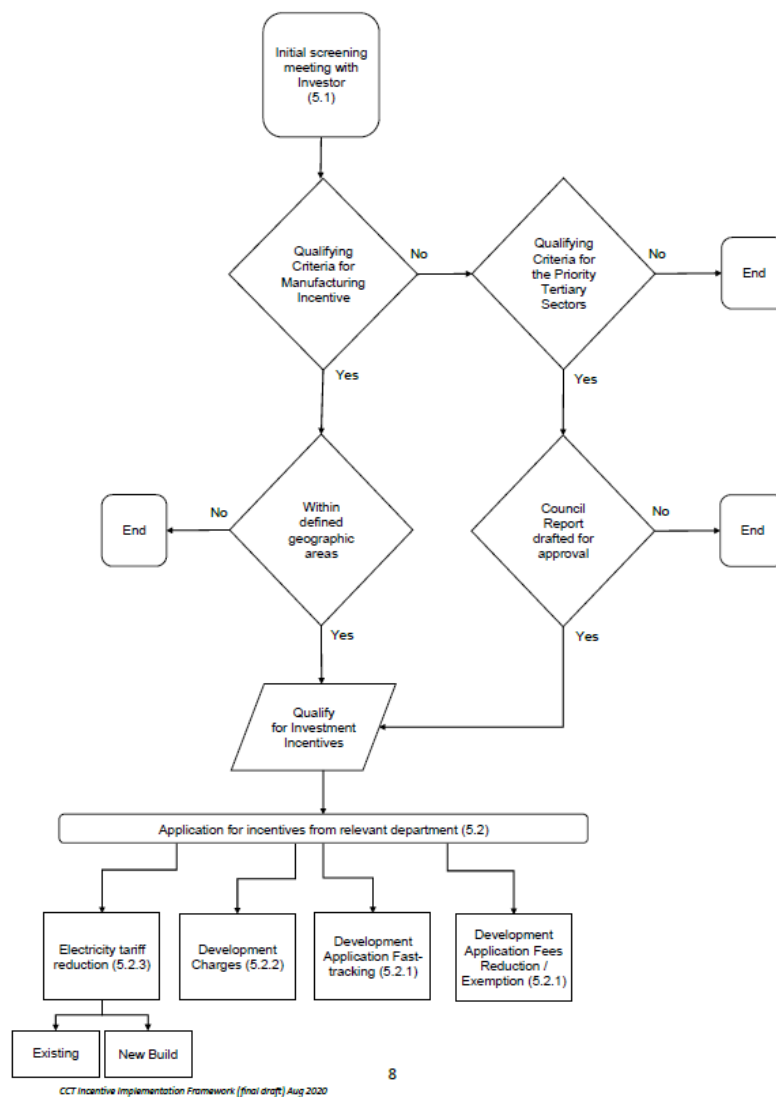


Figure 12 Application Process

g) Advantages and Disadvantages

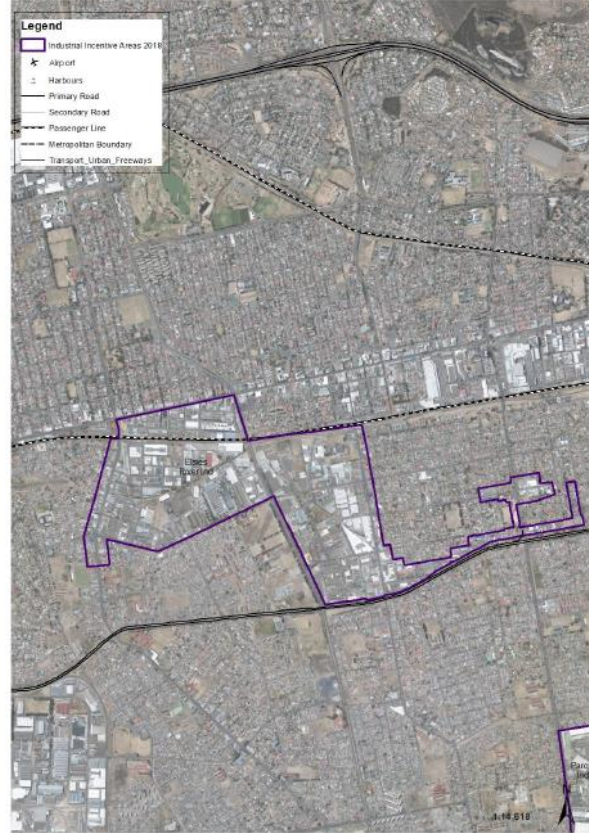
Advantages	Disadvantages
- Help mitigates financial risk to developer and marginally improves overall project feasibility. Compared to all local municipalities building plan fees are above average, but more than double compared to Johannesburg, Pretoria or Durban (commercial office is +- x3 more expensive) (ECAMP, 2013). - Currently regulated within the City's Investment Incentive Policy	- At the moment this incentive is only applicable to two economic sectors and only six geographic areas in Cape Town. However, this is done to mitigate severe financial risk to the City. - According to 2013 SAPOA study, developers did not consider fees relating to EIAs, subdivisions or building plan submissions as a major issue.

h) Targeted Areas- the following maps defined geographic areas for manufacturing incentives:

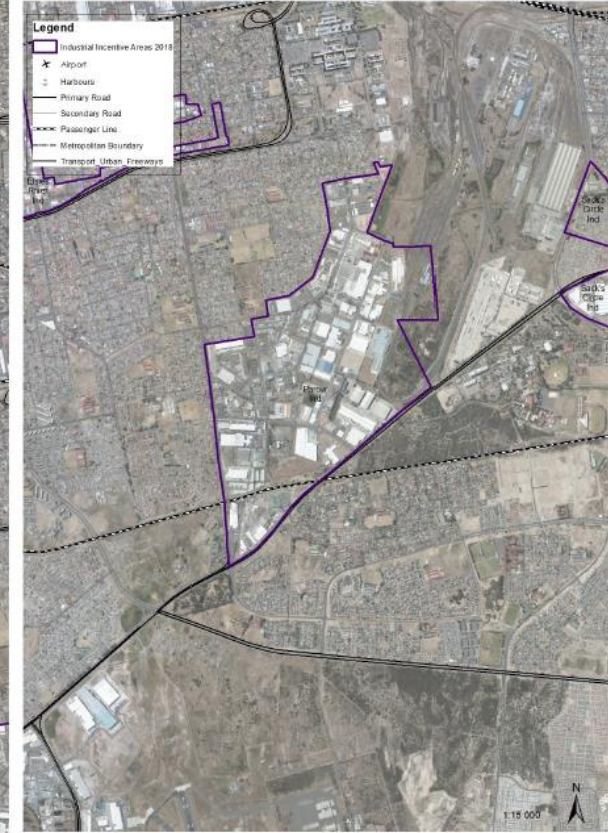
Atlantis Industrial Area



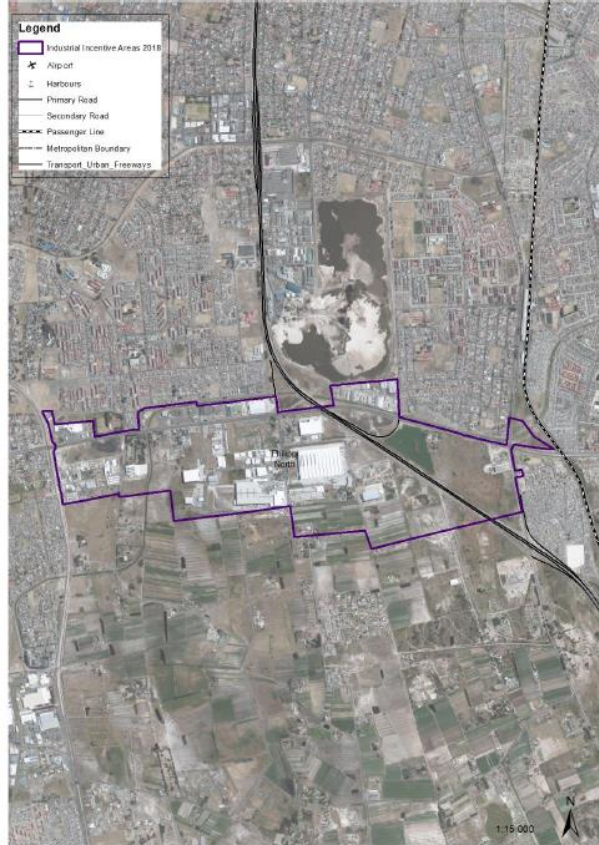
Elsies River



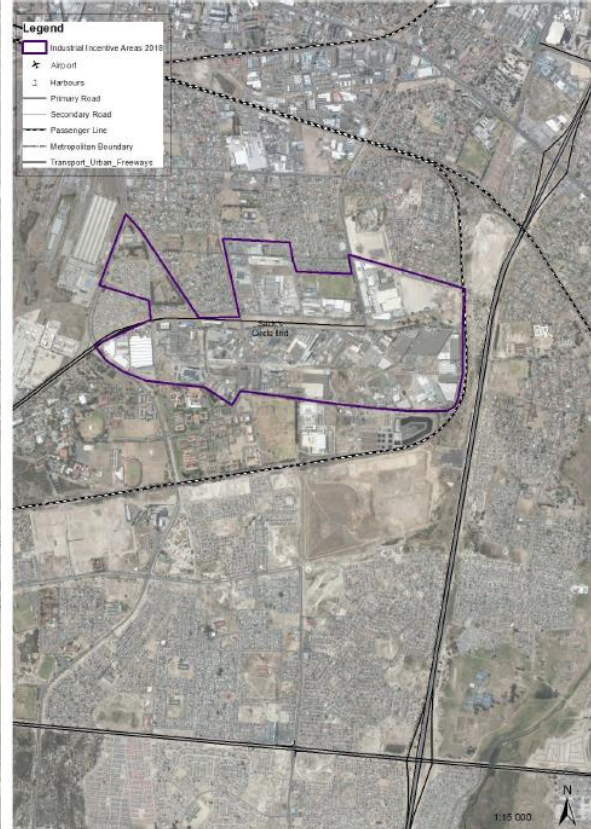
Parow Industria



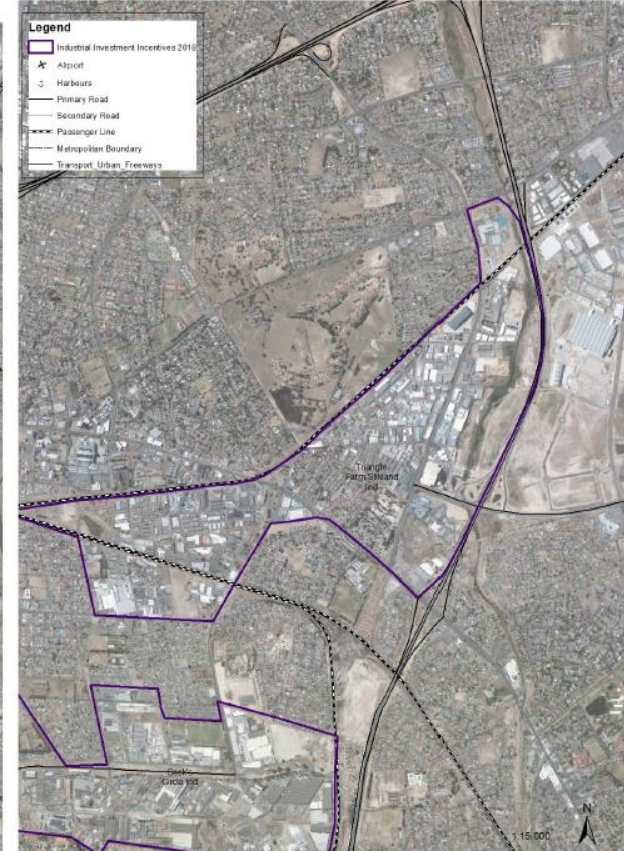
Philippi North



Sacks Circle



Stikland/Triangle Farm



Discounted Electricity Tariffs

Focus Area:

- Manufacturing within 6 defined geographic areas. This includes the broad manufacturing sector OR priority manufacturing sectors being:
 - Agro-processing
 - Green technology
 - Electronics and electrical engineering
 - Clothing and textiles.
- Priority tertiary sector industries are defined by the City's economic research and strategic documents including the Integrated Development Plan, the Social Development Strategy, the Inclusive Economic Growth Strategy and Project Camissa. These industries include:
 - Business Process Outsourcing (BPO),
 - Information and Communication Technology (ICT),
 - Tourism,
 - Film Industry.

Project Type:

- For private development

Goal:

- To attract job-creating investment into Cape Town's economy with a specific focus on making it a preferred business destination.
- Incentivise economic development

a) How it works:

This incentive is only available on the energy component of the tariff to investments that are located in the City supply area and whose usage profile qualifies them for the Investment Incentive SPU, Investment Incentive LV or Investment Incentive MV tariff as contained in the tariff book that forms part of the approved budget. This incentive is available to investments that meet the qualifying criteria and are located in the City.

- i) A reduction of 10% in monthly electricity tariffs for the period of 2 years for users on the Large User TOU (Time of Use) and SPU1 (Small Power User 1) tariffs.
- ii) The incentive tariff will only apply to the energy component of the tariff and not on the fixed and demand components in order to ensure proper load management.

b) Costs or Risks

Loss of income to the City and risk of incentivising unsustainable economic practices, such as land extensive activities or activities which consume very large quantities of water, electricity and generates significant waste. Although this may have a high short-term impact, there is significant risk of entrenching dependencies by weak firms

on City and artificially delaying necessary economic transformation, which is especially pertinent to consolidation areas identified by ECAMP (i.e. Sak's Circle). However, to mitigate against the attached risks the Investment Incentives Policy subjects each geographic area to a limitation on the number of businesses that may access the financial incentives. The rationale for this limitation is to provide a mechanism for the active management of the fiscal impact of the financial incentive as well as being able to adapt to shifting development objectives across each geographic area.

c) Preconditions (When to use it)

- i) Targets areas with clear potential for economic growth but which is currently underperforming/lagging. This will be determined by the market potential and performance scores as revealed in the City's Economic Areas Management Programme (ECAMP). However, this is limited to manufacturing and tertiary sectors.
- ii) Financial incentives for manufacturing sector investments are only available in six industrial nodes within the City. These nodes have been selected based on an evaluation of their current performance, long-term growth potential and suitability for incentives. The designation of spatially targeted geographic areas for incentives will be approved by Council from time to time. The areas where the manufacturing sector incentives currently apply are:
 - (a) Atlantis Industria
 - (b) Triangle Farm
 - (c) Parow Industria
 - (d) Sacks Circle
 - (e) Landsdowne Industrial (known as Philippi North in ECAMP)
 - (f) Elsie's River
- iii) Tertiary sector activities (or service industries) comprise the subset of the economy that provides support to the primary and secondary economic sectors. Priority tertiary sector industries are defined by the City's economic research and strategic documents including the Integrated Development Plan, the Social Development Strategy, the Inclusive Economic Growth Strategy and Project Camissa. These industries include:
 - (a) Business Process Outsourcing (BPO),
 - (b) Information and Communication Technology (ICT),
 - (c) Tourism,
 - (d) Film Industry.

d) Qualifying Criteria

The following criteria must be met in order for investments to qualify for the manufacturing sectors incentives:

- i) The investment must constitute a new investment or expansion of an existing investment in the area, but cannot be a relocation of an existing business or part thereof within the municipal boundaries of Cape Town

- ii) Proposed investment or expansion must be within either the broad manufacturing sector OR priority manufacturing sectors being:
 - (1) Agro-processing
 - (2) Green technology
 - (3) Electronics and electrical engineering
 - (4) Clothing and textiles
- iii) The minimum thresholds to qualify for the incentives are:
 - (5) In the broad manufacturing sector: a minimum of 50 new permanent full time jobs within two years
 - (6) In the priority manufacturing sectors: a minimum of 20 new permanent full time jobs within two years
- iv) The investment or expansion must be located in the spatially areas as approved by Council.

Incentives for investments in tertiary sector industries will be subject to the following criteria:

- i) The investment must constitute a new investment or expansion of an existing investment in the area, and cannot be a relocation of an existing business or part thereof within the municipal boundaries of Cape Town
- ii) The investment must be in one of the City's priority tertiary sector industries as informed by the City's economic research and strategic documents.
- iii) The investment or expansion must create a minimum of 20 new full time jobs within 2 years.
- iv) The strategic or catalytic importance of the investment to Cape Town's economy.
- v) The capital value of investment into Cape Town over a ten-year time horizon must reach a minimum amount of R100 million.
- vi) The investment support for entrepreneurs and SMME's within the sector aligned with the enterprise and supplier development element as described in the Amended Codes of Good Practice

e) Timing

This incentive might change over the lifecycle of an area: The City's ECAMP work has demonstrated that economic areas move through cycles and that different interventions are appropriate at different stages in an areas' lifecycle. This means that an area selected for incentives may lose that Investment Incentives Policy Final Approved May 2018 status in the future. Conversely, areas not selected initially may be targeted at a later stage as its context and performance changes.

f) Approval and Application process (where relevant)

- i) Approval
Approved as part of City's Investment Incentives Policy

ii) Application Process

When an applicant is interested in this incentive or any other incentive offered in the City's Investment Incentive Policy, an initial meeting to be held between the investor and officials from the Investment Facilitation Unit (IFU) for the purpose of clarifying the requirements and scope of the investment incentive scheme and providing any additional information relating to:

- (1) Incentives available,
- (2) Qualifying and performance criteria,
- (3) Information required from the investor,
- (4) the administrative process and timeframes going forward.

Eligibility for the manufacturing sector incentives is based on the qualifying criteria and will be confirmed in an Incentive confirmation letter that will be signed by the Executive Director: Economic Opportunities and Asset Management

Eligibility for tertiary sector development will require approval by Council. Once approved by Council the investor will be informed by the IFU of the outcome in an Incentive confirmation letter that will be signed by the ED. This letter will also list the incentives that the investor is eligible for and any special conditions imposed by Council.

The investor will be required to complete the standard electricity supply application form available from the Electricity Department. This must be accompanied by the incentive confirmation letter where after the investor will be loaded onto the applicable incentivised tariff for a period of two (2) years. The incentive will become available from the date when the new investment becomes operational (i.e. new supply is commissioned).

The IFU will monitor compliance of the investment in terms of reaching the required job targets after the two (2) year period. The Electricity department will also keep record of the amount of discount that the investor receives from this date onwards. Record must be kept for the entire incentivised period so that the total benefit that the investor received can be calculated.

Where the incentive is accessed by an existing investor wishing to expand their operations, the same application process as outlined above will apply. The incentive benefit will become available once the expansion becomes operational. The IFU will conduct a site visit to the premises prior to the expansion and once the expansion is complete in order to verify physical evidence of the expansion.

Due to the City's billing system and clients receiving one municipal account per erf, the incentive will apply to the applicant's entire monthly bill at that erf and not only to the portion that was expanded.

A summary of the application process is depicted in Figure 13 below. Full details can be found in CCT Standard Operational Framework for the Administration of Investment Incentives (2019).

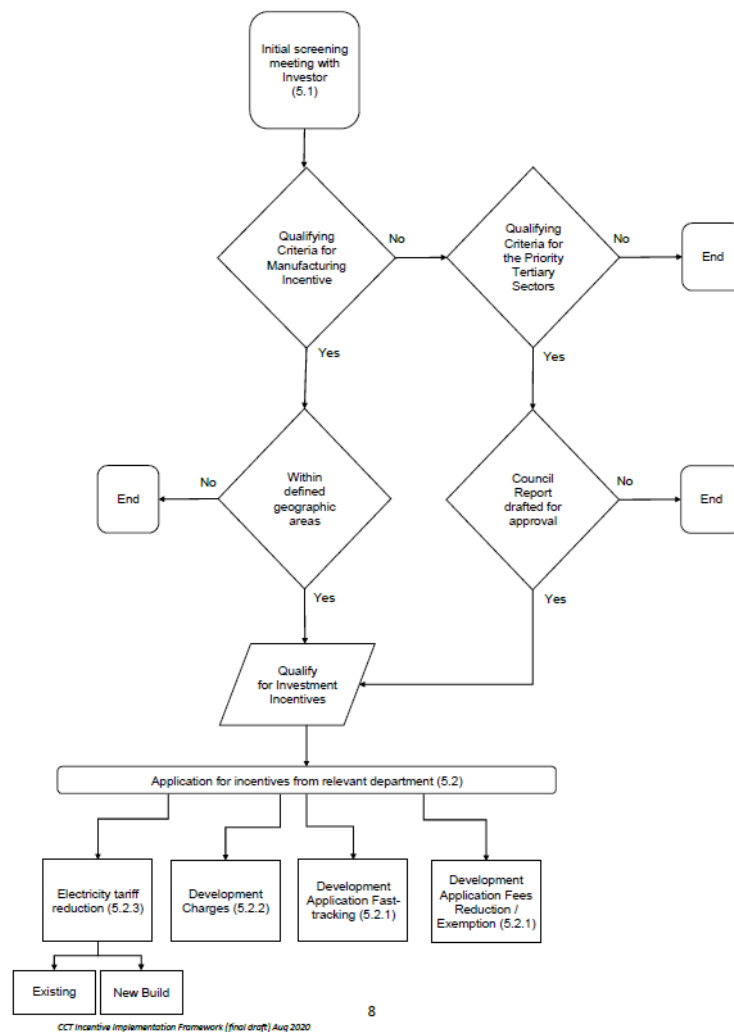


Figure 13: Application Process

g) Advantages and Disadvantages

Advantages	Disadvantages
- Helps reduce operational cost to the property owner. - Currently regulated within the City's Investment Incentive Policy	At the moment this incentive is only applicable to two economic sectors and only six geographic areas in Cape Town. However, this is done to mitigate severe financial risk to the City.

h) Targeted Areas

Financial incentives for manufacturing sector investments are currently only available in six industrial nodes within the City. The maps below depict geographic areas for manufacturing incentives:

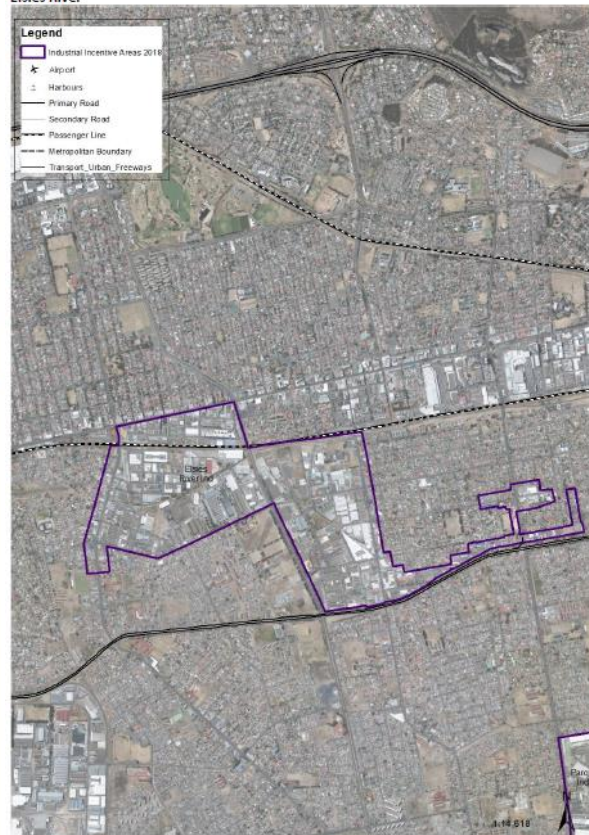
The following tertiary sectors have been identified of this incentive:

- Business Process Outsourcing (BPO),
- Information and Communication Technology (ICT),
- Tourism,
- Film Industry.

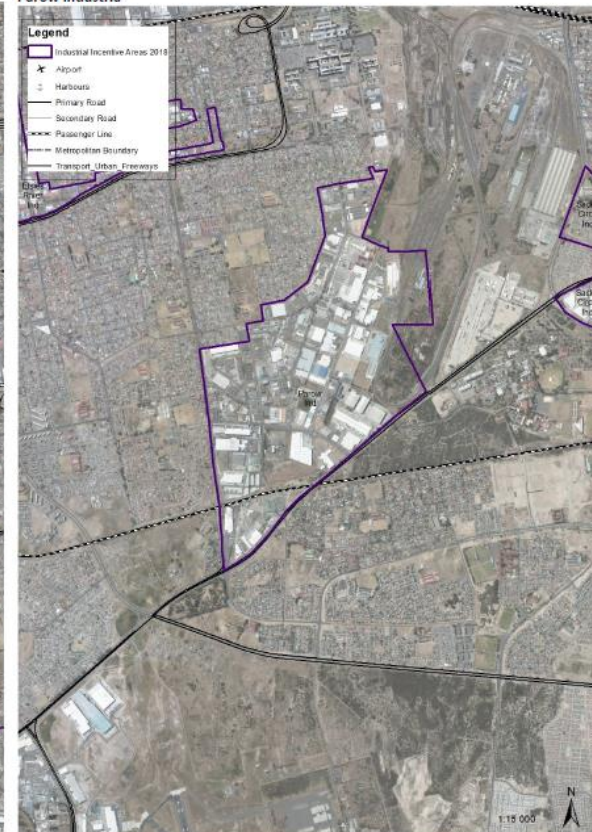
Atlantis Industrial Area



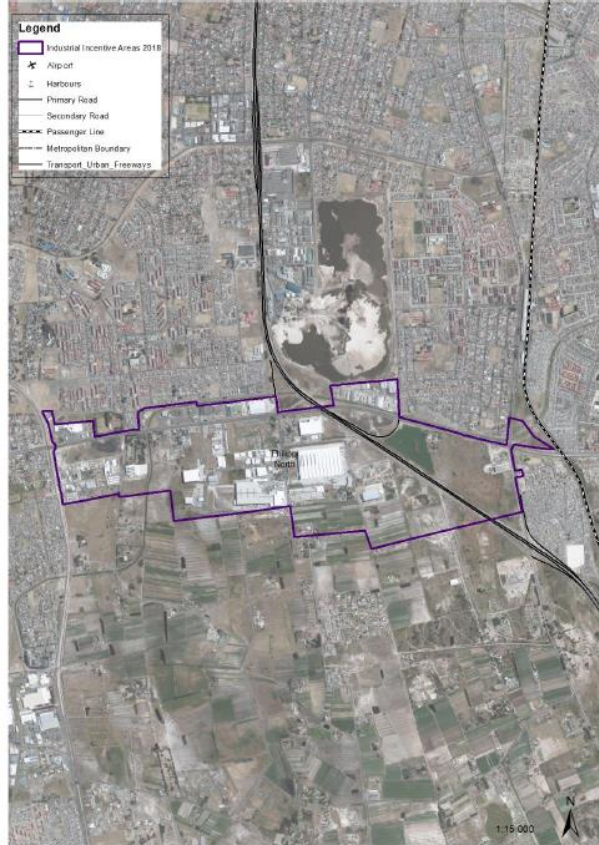
Elsies River



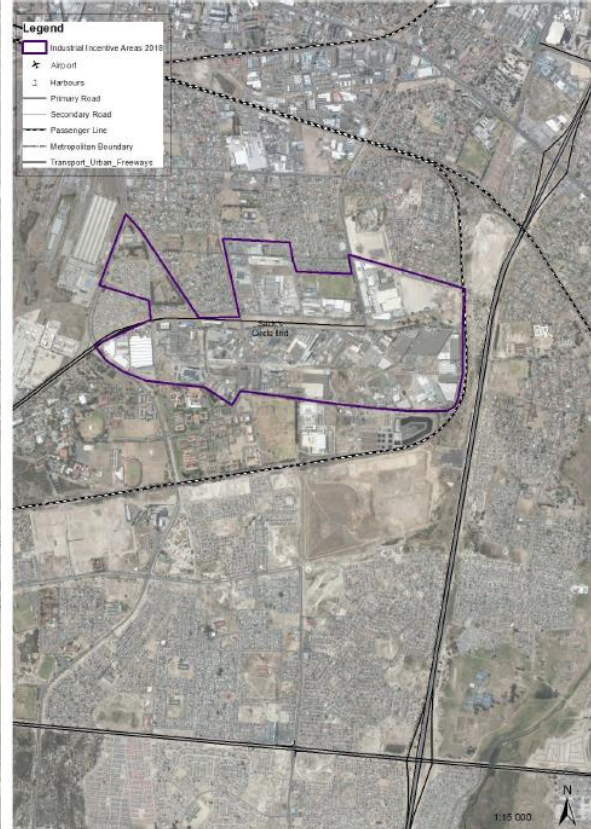
Parow Industria



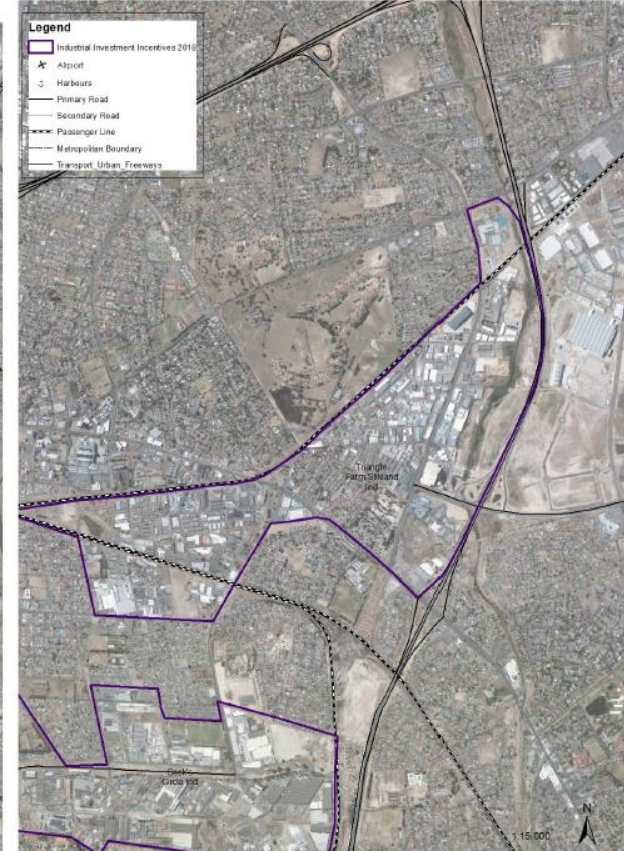
Philippi North



Sacks Circle



Stikland/Triangle Farm



PT Zones

Focus Area:

- Areas with high public transport accessibility
- Transit-oriented development
- Densification/Intensification

Project Type:

- Areas around Transit Accessible Precincts
- New developments

Goal:

- Reducing parking requirements for new developments as a means of increasing densities in targeted areas.
- Encourage use of public transport amenities.

a) How it works:

- i) PT 1 and 2 areas recognise the impact that the frequent and high-quality public transport network can have on reducing the use of private vehicle and lower demand for parking in these areas. This is also in line with the City's objective to address private car dependency proactively and to adopt policies which will promote mass public transport and transit-oriented development.
- ii) PT 1 and 2 parking requirements can significantly reduce red tape if a property is located in such defined area, as the site will automatically qualify for lower parking requirements.
 - (1) A PT1 classification demarcates an area where the use of public transport is promoted, but where the City considers the provision of public transport inadequate or where the use of motor vehicles is limited.
 - (2) A PT2 classification demarcates an area where the use of public transport is promoted and the City considers the provision of public transport good, or where the use of motor vehicles is very limited.
- iii) If an area has not been specifically identified by Council as a PT1 or PT2 area, then the parking requirements for Standard areas shall apply.
- iv) All rail stations and MyCiTi bus stations were originally scored, based on their level of connectivity; capacity and frequency; quality of stations and rolling stock; as well as the quality of the precinct. More recently, MyCiTi feeder services were scored on level of service; connectivity, and demand resilience. The Golden Arrow bus services and minibus taxi services were added by plotting and ranking the major areas of boarding and alighting.

Minimum criteria for the demarcation of PT1 and PT2 areas

Minimum criteria	PT1 Standard	PT2 Standard
Public transport service	Maximum of 400m from station	Maximum of 400m from station
Connectivity provided by Trunk and Feeder Services.	Minimum: Station with either a single T1 service or multiple T2 services.	Minimum: Station with multiple T1 services or a combination of T1 and T2 services.
Capacity provided by the public transport service	Minimum: Station can accommodate a passenger throughput of not less than 20 000 passengers per hour during peak periods.	Minimum: Station can accommodate a passenger throughput of not less than 40 000 passengers per hour during peak periods.
Frequency of the public transport service	Minimum: Number of vehicle stops at station is not less than 20 vehicles per hour during peak periods. OR Minimum: Headways to be a minimum of 12 mins in peak hour.	Minimum: Number of vehicle stops at station is not less than 40 vehicles per hour during peak periods. OR Minimum: Headways to be a minimum of 8 mins in peak hour.
Rolling stock quality	Minimum: Rolling stock clean (including no graffiti) and un-vandalised.	Minimum: Rolling stock clean (including no graffiti) and un-vandalised.
Stations quality	Minimum: Stations clean, maintained and un-vandalised. Minimum: Safety and Security: Lighting within station area with visible security staff present	Minimum: Stations clean, maintained and un-vandalised. Minimum: Safety and Security: Lighting within station area with visible security staff present and with CCTV surveillance.

Figure 14: Criteria for PT1 and PT2 areas

Additional minimum criteria to the above for extension of PT1 and PT2 areas

Minimum criteria	PT1 Standard	PT2 Standard
Precinct Level of Service	Maximum of 800m from station	Maximum of 500m from station
Area precincts: Quality and Level of Service (LOS)	Minimum: • Safety and Security: Area lighting with visible security present. • NMT: NMT facilities provide access, including road crossings, to stations and stops. • Maintenance: Regular maintenance undertaken of area.	Minimum: • Safety and Security: Area lighting with visible security present with CCTV surveillance of precinct. • NMT: NMT facilities provide access, including road crossings, to stations and stops. • Maintenance: Regular maintenance undertaken of area. • CID Management: The precinct is included in the area managed by the CID.

Figure 15: Additional criteria for PT1 and PT2 areas

b) Costs or Risks

- i) Risk of a lack of improvement to public transport services (rail and road) and station precincts will prevent uptake of PT1 and PT2 areas offering.
- ii) Hard to break attitudes towards private car use and promote moves to public transport for middle and upper class.

c) Preconditions (When to use it)

- i) The Cape Town Zoning Scheme currently sets out the minimum off-street parking standards required for different land uses and includes the mechanism to identify PT1 and PT2 areas.
- ii) It is only applicable in the areas as delineated on the PT areas map.

d) Timing (i.e. Before or after development, or when to remove the mechanism (i.e. in the case of the UDZ or the investment and incentives policy once the area is self-sustaining)

- i) Applied before development and influences the typologies and forms of development that emerge.

e) Approval and Application process (where relevant)

- i) Approval

No special approval process is needed for land use applications making use of them. However, areas initially determined to be PT1 Areas may be changed to PT2 Areas once the Municipality is satisfied that the provision of public transport is adequate.

- ii) Application

These are applied during the land use and building application submission processes.

f) Advantages and Disadvantages

Advantages	Disadvantages
• Already approved and implemented. • Encourages dense forms of development • Promotes the City's public transport networks • Encourages a move away from single car ridership • Ecological and environmental benefits • Uses public infrastructure more efficiently • Can enable marginally viable developments to become viable	• Does not help pay for a municipality's infrastructure needs • Does not create a direct revenue source for a municipality • Does not distinguish between promoting intensification of trip attracting or trip producing land uses, but is most effective if applied to trip attracting land uses

g) Lessons Learnt

The uptake of the PT offerings (2014-2019) is currently being measured.

h) Targeted Areas

Map below illustrates areas throughout the City where PT zones have been identified.

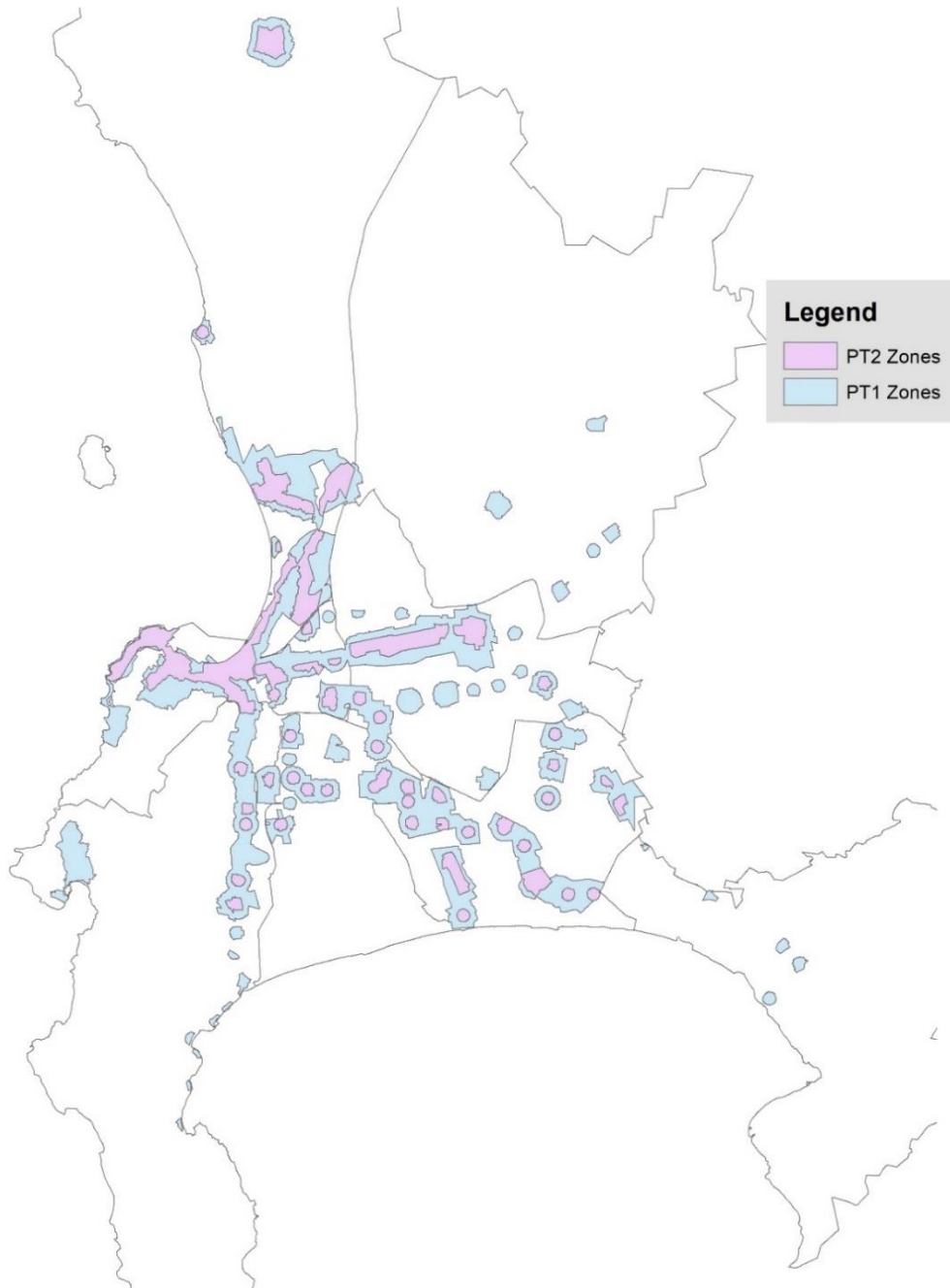


Figure 16: PT Zones

Urban Development Zones

The UDZ is a National Treasury tax incentive administered by SARS that aims to address urban decay in South Africa's inner cities by promoting private sector-led investment in commercial and residential developments.

Focus Area:

- Delineated geographic areas
- Urban centres and inner city environments (experiencing urban decay)
- Areas with high population carrying capacity
- Areas with developed public transport

Project Type:

The tax incentive can be claimed for any of the following within the UDZ geographic area:

- erection, extension or improvement of or addition to an entire building;
- erection, extension, improvement or addition of part of a building representing a floor area of at least 1 000 m²;
- erection, extension, improvement or addition to low-cost housing; or
- purchase of such a building or part of a building directly from a developer on or after 8 November 2005, provided that certain requirements are met.

A taxpayer will only qualify for the UDZ allowance if the building or that part of the building is used solely for purposes of that person's trade (N.B. This excludes residential owner-occupiers.)

Goal:

- The UDZ aims to encourage private sector-led residential and commercial development in inner-city areas with developed public transport facilities.
- The core objectives of the incentive are to address dereliction and dilapidation in South Africa's cities and to promote urban renewal and development by promoting investment by the private sector in the construction and/or improvement of commercial and residential buildings.
- Assist in the maintenance of existing infrastructure.
- Promote wide-range economic development and job creation.

a) How it works:

- i) The UDZ is introduced in the form of an accelerated depreciation allowance on the costs of buildings erected, added to, extended or improved within the UDZ (as effected by the insertion of section 13quat into the Income Tax Act).
- ii) The tax incentive, when claimed, reduces the taxable income of a taxpayer. The incentive is not limited to the taxable income of the taxpayer and can create an assessed loss.
- iii) The UDZ incentive is calculated in different ways depending on the type of development that is improved, added or the inclusion of low-cost housing.
- iv) The municipality determines the boundaries of the areas for the UDZ incentive based on the of 2009 National Treasury/SARS guidelines for delineation of UDZ boundaries.

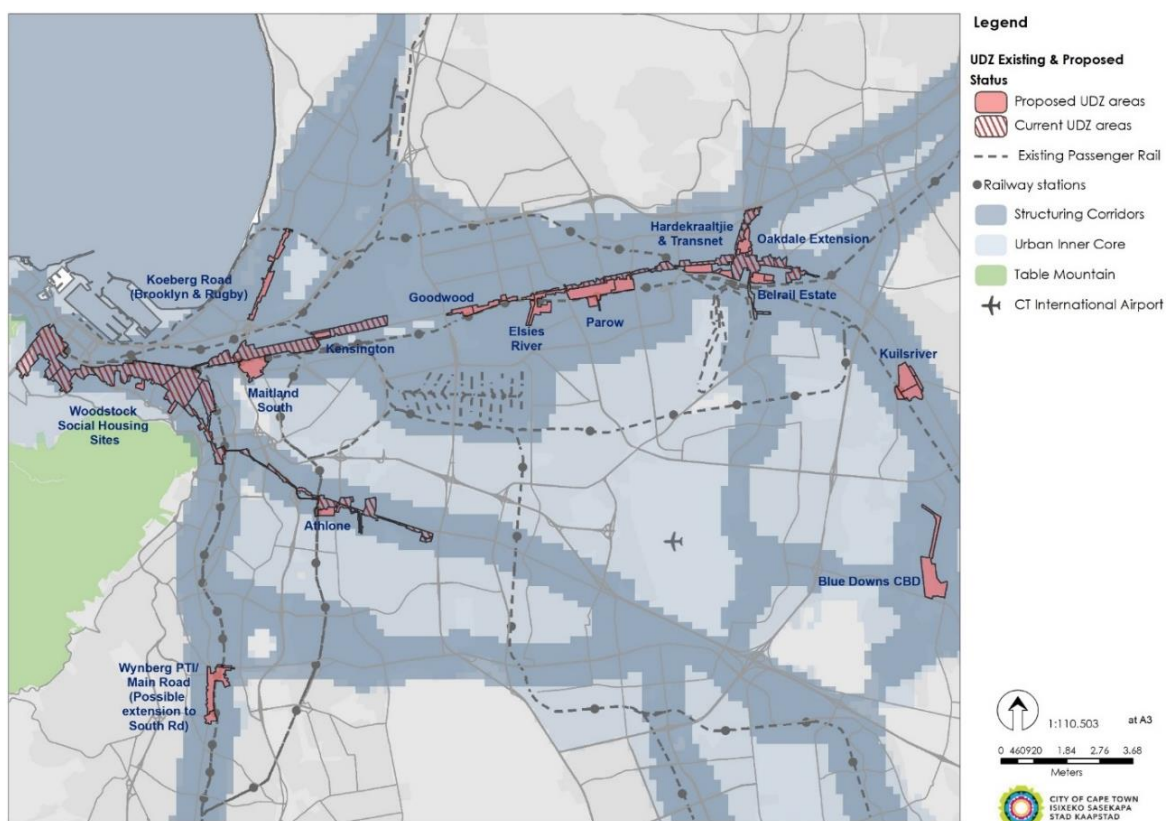


Figure 17: Existing and Proposed UDZ Areas within the City of Cape Town

b) Costs or Risks

- i) Costs borne by the national fiscus through foregone tax, however increased rates generation improves the prospects of municipal self-reliance.
- ii) The UDZ incentive was initially only available until March 20, was subsequently extended to March 2020, and has just been extended until March 2021. The future of the incentive remains unclear.

Note: The City has requested and motivated for the extension of the UDZ Incentive (as well as the UDZ coverage) beyond the current sunset clause.

c) Preconditions (When to use it)

- i) In markets where the municipality would like to facilitate the regeneration of inner city environments into dense and transit-oriented urban areas.
- ii) areas that are experiencing urban decay.

d) Timing

Development in already buoyant, regenerated urban property contexts is potentially over-incentivised, which results in 'freeloading' (e.g. the Cape Town CBD area). This is a criticism that has been bandied about with increasing frequency by civic and social lobbyist groupings. To this end, it is argued that the existing UDZ coverage may require re-delineation to areas that are more consistent with the objectives of the UDZ.

e) Approval and Application process (where relevant)

i) Approval

The UDZ is already an approved incentive in the Income Tax Act.

ii) Application

The onus is on the taxpayer claiming the incentive to complete and submit various forms to SARS. The taxpayers must also obtain a location certificate, issued by the municipality, confirming that the building or part of a building that was constructed, improved or purchased from a developer is located within a UDZ within the boundaries of that municipality.

f) Advantages and Disadvantages

Advantages	Disadvantages
- Existing mechanism with approvals and policy in place. - Does not require municipal financing or any capital resources or debt to implement - Results in spatially targeted development and regeneration of - Uses public infrastructure more efficiently and most likely does not require additional infrastructure - Increases the rates base in certain areas for the City	- As a mechanism by itself, does not always provide enough incentive to draw investment to an area. Other preconditions such as infrastructure, service delivery and urban management are key. - Limited success in promoting the development of low cost housing. - Can result in freeloading, areas like the Cape Town CBD, which is no longer experiencing urban decay, and as evidenced from this review, appears to be over-incentivised - Set to expire in March 2021

g) Lessons Learnt

The UDZ has been operational in Cape Town since 2004. When the UDZ tax incentive was introduced, the City demarcated a total area 630ha for Urban Development zones. Two zones were selected and included Cape Town CBD and Bellville CBD. Both UDZs are located along existing transport corridors. The first zone accounts for (551ha) and includes most of Cape Town CBD, and land adjacent to the Southern Main Road and Klipfontein Road. The second zone includes 78ha of the Bellville

CBD, land adjacent to Voortrekker Road Corridor (CCT, 2016). These areas were selected primarily because they best fit the criteria set out by UDZ legislation. The two zones were characterised as areas where there was significant public investment in infrastructure and service; that they were highly accessible; that accommodated and or serviced large volumes of people; that employed a majority of people and that were economically significant but experiencing decline due to the decentralisation of businesses.

Metropolitan Spatial Planning has produced a comprehensive evidence-basis to inform a motivation to have the Cape Town Urban Development Zone extended beyond March 2021. Evaluate the take-up and performance of the UDZ in Cape Town as well as suggest ways in which the incentive could be improved Also undergone thorough review and research of alternative boundary delineations for the UDZ. See **UDZ Performance Review: Cape Town, 2006 – 2018.**

It was highlighted in the report that the UDZ should be aligned with other development incentives to optimise its function as a spatial targeting tool. These incentives could include:

- Fast-tracking of development application process
- Parking requirement reductions (PT zones)
- Grants for public environment upgrades

Developers engaged with identified these as drawcards for them to invest in an area. Appropriate spatial application of the UDZ as a package of incentives would improve successful implementation of this category. Moreover, the non-existence of other more important inclusionary housing legislation is more of a factor inhabiting low cost inner city housing than the UDZ.

h) Targeted Areas

Existing delineation

Small-Scale Rental Unit Incentives

Focus Area:

- Areas of informality
- Incremental housing
- Single unit land parcels

Project Type:

- Incremental upgrading
- Rental
- Multifamily
- Informal market
- Private

Goal:

- Encourage housing development in areas where the local government has identified a shortage of housing affordable to low- and moderate-income households
- Incentivise development of rental housing stock
- Empower existing home owners to provide additional housing supply and earn additional income.

a) How it works:

- i) In SR2 zoning both a dwelling house and a second dwelling are primary uses and a shelter is permitted as an additional use subject to the owner or occupant accepting shelter.
- ii) To accommodate additional housing units on a property zoned SR2 will require amendments to the Development Management Scheme. Section 148 of the Municipal Planning By-Law (MPBL) makes provision for the preparation of an overlay zone. The City may after following a notice procedure as contemplated in section 81 of the MPBL and after consideration of objections/comments received designate a land unit area to have a specified overlay zone.
- iii) There is more often no formal written lease agreement which regulates the relationship between the tenant and the property owner
- iv) The City should identify areas in which to encourage this form of development

b) Costs or Risks

- i) Administrative costs to verify service availability in targeted areas and ensure compliance with stipulations of incentive.

- ii) USDG funding (from National government) would be required to service approved sites/areas as well as new sites if new township development is required.

c) Timing (i.e. Before or after development, or when to remove the mechanism (i.e. in the case of the UDZ or the investment and incentives policy once the area is self-sustaining)

d) Approval and Application process (where relevant)

i) Approval

Report recently approved by council. Executive Director of Spatial Planning and Environment required to either amend the Zoning Scheme in areas where the City would like to encourage this form of development by either creating an overlay zone or introducing small scale rental units as an additional use within the SR2: Incremental Housing zone.

ii) Application

The time it takes to obtain planning permission is discouraging a number of role players not to make use of this opportunity. To accommodate this development trend, it would be necessary for the City to amend the development rules applicable to SR2 in the Development Management Scheme. This development trend should be limited to areas zoned SR2; areas which have been established in terms of the Housing Act and in association with higher order roads and access to public transport. Additional areas should also be identified via the Local District Plans currently under preparation.

e) Advantages and Disadvantages

Advantages	Disadvantages
• Does not require utilizing any capital resources or debt to implement • Addresses, in part, the housing backlog not covered by state or private market. • Building plans will be made available through a schedule of housing prototypes, speeding up approval process • Empowers potential small scale rental landlords to become owners of an on-site long term capital asset that will grow in value over time • Offers an immediate source of revenue for small scale rental landlords • Can serve to target densification	• Does not create a direct revenue source for a municipality • Does not help pay for a municipality's infrastructure needs • May result in sub-standard, overcrowded conditions if not well managed. • Poor housing conditions may follow if housing prototypes aren't correctly adhered to and maintained into the future. • Some residents may not be able to access financing.

f) Lessons Learnt

Khayelitsha – An assessment of existing small scale rental units in Khayelitsha shows that 7425 additional housing opportunities have been provided on 5294 properties out of a total of 9007 properties. Nearly 60% of the property owners in the study area have exercised the opportunity to use their property to provide additional housing opportunities on their properties. Of the 7425 additional housing opportunities nearly 40% are formal additional housing structures.

Development delivery of additional rental stock occurs in a relatively short period of time. Since the 2011 census it can be stated that individual private owners in Khayelitsha have provided 24 725 additional housing opportunities on their properties. This response was in the face of a lack of government housing provision in this area although this area accommodates some of the highest number of poor people in the City.

g) Targeted Areas

SR2 Zoning, specifically informal areas

12.8.1.2. Income Generation Mechanisms

City-Owned Land Disposals and Leasing

Focus Area:

- Revitalizing areas
- Infill development

Project Type:

- City-owned properties that are transferred by way of sale for private redevelopment
- City-owned properties that are transferred by way of leasehold for private development
- Can be used to finance construction of infrastructure associated with redevelopment of the site (land in lieu of cash payment)
- A municipality can enter into a joint venture with a private developer by contributing land as equity

Goal:

- Dispose of property no longer needed for public purpose.
- Promote economic development.
- Ensure the most optimal utilisation of a property within the municipality's strategic objectives

a) How it works:

- i) In the case of **sales** of City-owned land:
 - (1) Local government disposes of property and transfers development rights to a private developer for economic development purposes:
 - (a) Land for a fee
 - (b) Land as in-kind payment for infrastructure
 - (c) Land as equity for development
 - (2) Tender process
 - (3) Local government may seek to maximise fair market value of the land or maximise other policy goals (e.g. affordable housing)
 - (4) Municipality & developer negotiate the land disposition deal structure with the goal of aligning public and private interests
- ii) In the case of **leasing** of City-owned land:
 - (1) The municipalities can also enter into long term lease agreements in respect of parcels of municipal land. The entering into these development rights agreements and lease agreements with a development company as described above may offer municipalities a better combination of cost, quality, quantity, productivity, risk and leverage capacity of financial resources, then could otherwise be obtained.

- (2) Methods of awarding leases may be by bidding process either by public tender or auction or by unsolicited bids or under certain conditions by private treaty.
- (3) The municipality would enter into a land availability agreement and/or development rights agreement (DRA) with a development company to develop the property.
- (4) The agreements will stipulate the consideration payable by the development company as well as the payment mechanism, timelines related to the completion of the development, the responsibilities of each party in relation to, inter alia, the township establishment, zoning, services etc.
- (5) The development company would develop the property at its own risk and costs.
- (6) The municipality would transfer the property which is the subject of the development into a special purpose vehicle
- (7) The development lease would be for a period of 99 years.
- (8) Conditions would need to be set if there are going to be sub-letting of commercial/residential stands or if sale agreements are reached with end-users.

b) Costs or Risks

- i) Loss of an asset, but positive fiscal impact due to one-time transaction and long-term social or economic benefit in the case of sale of land
- ii) Can achieve City strategic developments on land which the City does not have the capacity to develop on by leasing/releasing land to private market.
- iii) Requires expertise within the local authority to negotiate with private sector
- iv) Land may be used in line with spatial goals if the right conditions are attached to its disposal.

c) Preconditions (When to use it)

- i) When City-owned property is no longer needed for public use
- ii) When to use depends on the City's main goals for the site (e.g. strong market conditions if goal is to maximize market value of the asset)
- iii) May be used to catalyse regeneration of a larger area where the market has lacked investment
- iv) Municipality must have authority to dispose of public property for private development
- v) Ideally dispose of land when market conditions are positive and where the site does not have major development constraints
- vi) Land may be disposed as equity for development:
 - (1) When there are challenges to redevelop the site making it unattractive to a private developer, the municipality may contribute the value of the land

(2) When land is adjacent to privately owned sites and can be combined into one regeneration project

d) Timing (i.e. Before or after development, or when to remove the mechanism (i.e. in the case of the UDZ or the investment and incentives policy once the area is self-sustaining)

e) Approval and Application process (where relevant)

i) Approval

This is already an approved operational process.

ii) Application

Follows Municipal Asset Transfer Regulations (MATR).

f) Advantages and Disadvantages

Advantages	Disadvantages
• Can result in direct cash revenues for a municipality in exchange for leasing or the selling of City-owned land • Redevelopment of a property promotes job creation • Results in increased tax revenues (potentially property taxes, sales tax, income taxes depending on the type of uses developed on the property) • Puts a vacant or underutilized property back into active use, which would otherwise continue to sit vacant and cause blight in a community • Can catalyse regeneration of an area which lacks investment • May encourage land use intensification	• If there are conditions that make redevelopment of the City-owned property financially challenging for a developer, a reduction in direct cash revenue or a public subsidy may be required • If selling City-owned property, this results in the City's loss of control over what gets developed on the property in the future. (Unless use covenants are in place, the new owner can change the use of the property in the future and the municipality can no longer assure that the project matches the development goals of the City)

g) Lessons Learnt

- Big Bay development
- Khayelitsha CBD
- LCC Parow
- Stellenbosch University Bellville Park Campus:
 - Stellenbosch University (SU) purchased 69 ha of land from the Bellville Municipality in 1982, of which ~23 ha is unsuitable for formal development purposes. In 2015 a MOA was signed between the City of Cape Town (CoCT) and SU regulating their relationship in the development of the purchased land. 18 ha of the developable land was designated for the establishment of new academic facilities and 26 ha of the remaining

developable land was earmarked for the development of a business node. The portion to be developed would need to have title deed restrictions removed in order for development to proceed at which point the two parties would share development costs (and/or bulk allocation) on a pro-rata basis. Revenue generated through the leasing or sale of land within the Bellville Park Campus will be shared equally between the two parties.

h) Targeted Areas

- i) Vacant and underutilised City-owned land throughout the city.
- ii) Catalytic Land Development Programme (CLDP) TOD Nodes or Areas.
- iii) TOD Hubs

12.8.1.3. Institutional Mechanisms

Streamlined Land Use Applications

Focus Area:

- Industrial areas
- Value-added production sector
- Manufacturing within 6 defined geographic areas. This includes the broad manufacturing sector OR priority manufacturing sectors being:
 - Agro-processing
 - Green technology
 - Electronics and electrical engineering
 - Clothing and textiles.
- Priority tertiary sector industries are defined by the City's economic research and strategic documents including the Integrated Development Plan, the Social Development Strategy, the Inclusive Economic Growth Strategy and Project Camissa. These industries include:
 - Business Process Outsourcing (BPO)
 - Information and Communication Technology (ICT)
 - Tourism
 - Film Industry

Project Type:

- New external investments
- Expansion of existing investment within proposed areas

Goal:

- To attract job-creating investment into Cape Town's economy with a specific focus on making it a preferred business destination.
- Incentivise economic development.

a) How it works:

- i) Currently, the fast-tracking of land use applications has been proposed by the Investment Incentives Policy (2018). The process and criteria for applying this mechanism is drawn from that document.
- ii) Applies to **all land use and building plan applications** by qualifying investments conditional on submission of suitably completed and compliant applications
- iii) **Additions to this methodology can be made**
 - (1) To extend the areas in which this incentive applies given the limited spatial scope of its current approach which only focuses on the Atlantis SEZ industrial area, Triangle Farm, Parow Industria, Sacks Circle Landsdowne Industrial (known as Philippi North in ECAMP) Elsie's River
 - (2) New spatial sites should be proposed for this mechanism which will offer pre-approvals for applications in Development Focus Areas.

- (3) Further capacity will be required for the Land Use Management Department and the Land Use Management System (LUMS).
 - (4) This could also emerge as a by-product of a proposed overlay zone to further the incentives proposed by an overlay zone.
- iv) The TOD Manual for Development Management proposes:
- (1) The City should streamline land use application process for development proposals in line with TOD and located in TAPs
 - (2) Figure 18 illustrates the depiction of a typical development application process, which the TOD Manual offers ways in which operational improvements can take place.
 - (3) When a developer contemplates a land use application for approval by the City a pre-application consultation phase exists before the submission and assessment of the formal application. This is especially important when the application is likely to result in construction activities that will require municipal services.
 - (4) An important first step in the pre-application consultation stage is to determine if the development proposal meets the criteria for decision as set out in Section 99 of the City of Cape Town Municipal Planning By-law 2015. Part of the abovementioned determination also includes a "consistency evaluation" of the development proposal with the MSDF.
 - (5) Within the "Urban Inner Core" with access to **existing** scheduled public transport service within Structuring Corridors **a three step consultative process** is suggested for applications relating to the rezoning of land, including rezoning to sub-divisional area overlay zoning.
 - (6) The three step consultative process occurs prior to the submission being made and includes meeting between a Development Management case officer, the developer and the relevant line departments. The focus of this process is on the **yield and type, urban design, environment and heritage, and transport operations and infrastructure**.
 - (7) Further detail is provided in Figure 20 as to the approach which should be taken "Urban Inner Core" with access to **planned** scheduled public transport within Structuring Corridors
 - (8) For the remainder of the "Urban Inner Core" (i.e. those areas without access to scheduled public transport) and "Consolidation" areas, Discouraged Growth Areas and Critical Natural Assets, standard operating procedures apply unless applications are made for substantial intensification of land use within Discouraged Growth Areas.
 - (9) However, additions to these geographically delineated areas can be made to include the Development Focus Areas or mandating that a blanket approach is taken with regards to land use applications throughout areas such as the Urban Inner Core and Restructuring Zones that makes the pre-application consultation mandatory.

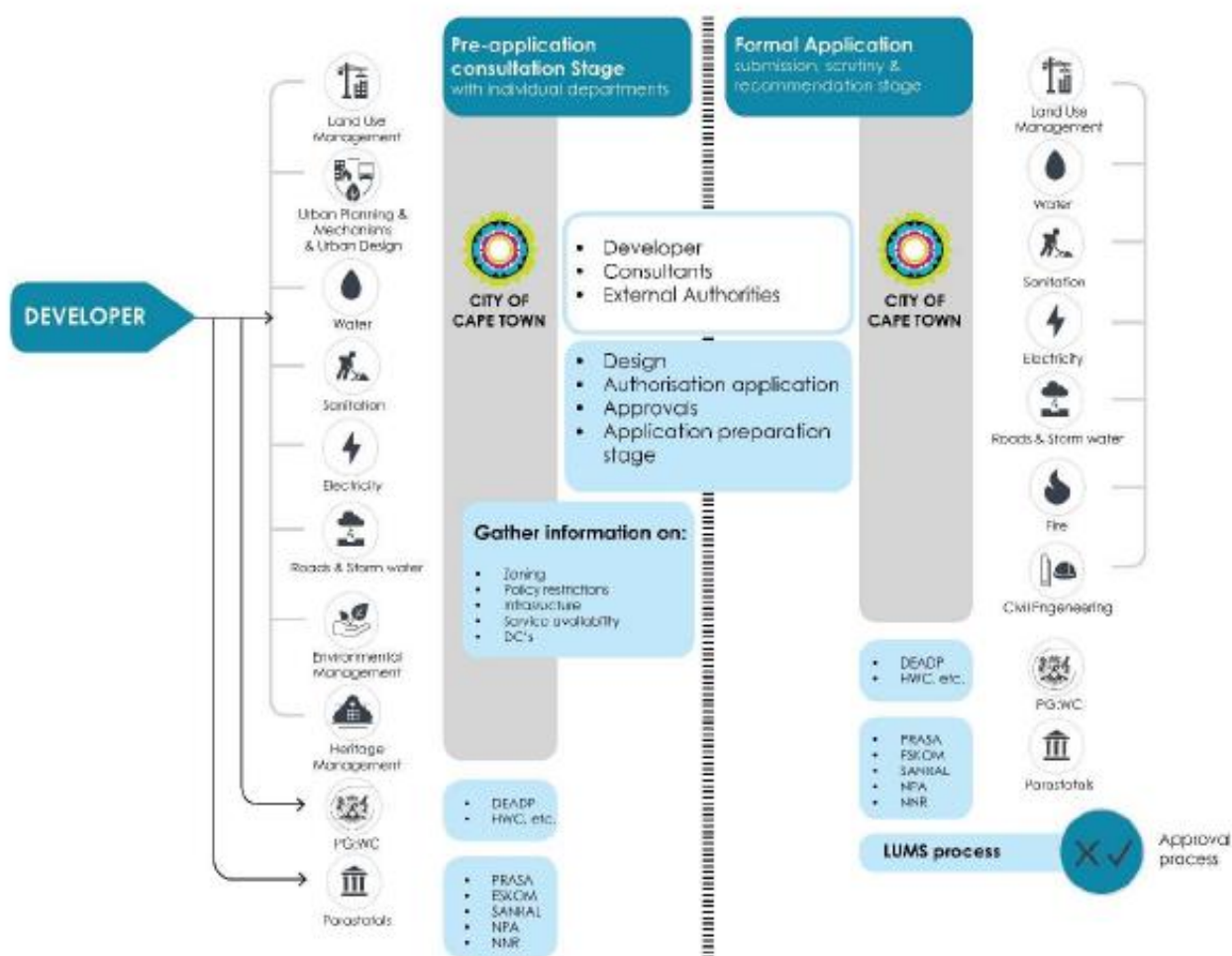


Figure 18 Depiction of a typical development application process

The **THREE STEP TECHNICAL CONSULTATIVE PROCESS** led by the DM Case Officer is as follows:

Step 1: Yield and Type

Clarify the "yield" of the proposal in terms of unit density and/or floor factor GLA (as guided by TODC/Densification Policy or other applicable local framework)

Negotiations on inclusionary housing should also be initiated and finalised in principle if applicable.

Step 2: Urban design, environment and heritage

Do a broader contextual evaluation of the proposal in terms of the City of Cape Town Urban Design Policy and TOD Design Parameters (refer to section 6 of this document). This should include environmental and heritage considerations

Step 3: Transport operations and infrastructure

Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects:

- Access arrangements, Parking provision, Road schemes and width, NMT, Traffic circulation, Public transport

The relevant study then needs to be submitted for pre-assessment after which a technical discussion will be arranged. During the technical discussion the specific transport elements of the design directive will be confirmed. Clarity should also be obtained by the applicant as to the availability of bulk utility services.

Figure 19 Three step consultative process for applications

GUIDELINES FOR ASSESSING LAND USE APPLICATIONS					
APPLICATION TYPE	"Urban Inner Core" with access to <u>existing scheduled public transport</u> service within Structuring Corridors	"Urban Inner Core" with access to <u>planned scheduled public transport</u> within Structuring Corridors	Remainder of "Urban Inner Core" and "Consolidation" Areas	Discouraged Growth Areas	Critical Natural Assets
Rezoning of land, including rezoning to sub-divisional area overlay zoning	Prior to submission, the applicant needs to be assisted with a clear <u>design directive</u> and clarity on application processes to be followed. This needs to be followed up with a three-step pre-submission technical consultation session <u>to finalise a design directive</u> for the proposal. This process is likely to be iterative until the design directive is clear. See below for the THREE STEP TECHNICAL CONSULTATIVE PROCESS. General Practice The case officer is the lead, setting up all three sessions and follow-up sessions until there is clarity on a design directive. - The final development directive, including the items identified during all three steps, should be <u>written up by the applicant (and verified by the case officer) and submitted as part of the development application.</u> - Care should be taken during the follow-up processing of the application that the proposal be evaluated in terms of the agreed design directive only. - Compliance by the applicant to the design directive should result in a shortened evaluation timeline. - Any major deviations from the design directive may lead to an intensive scrutiny and assessment of the application that could be time consuming.	A pre-submission consultation is compulsory to clearly establish the processes to be followed and to point out the relevant design aspects that need to be addressed. The proposed design must include "flexible elements" so that it would be able to "retrofit" the development once the public transport service is in place. <u>(Specific specialist guidance to be provided by the Urban Design Branch.)</u> Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	Standard operating procedures. For an application in the urban inner core area, cognisance should be taken of TODC and the applicant should address this in the motivation and design.	Standard operating procedures are followed for applications that do not result in the substantial intensification in land use rights. Prior to submission of application <u>for substantial intensification of land use</u> the applicant is required to initiate a pre-submission consultation session at the relevant district office. During the session clarity will be provided on the specialist studies required and application processes to be followed. Specialist studies may include: • Financial feasibility study • Provision of engineering services (internal and external) • Environmental and or heritage; • Hydrological • Geotechnical • Visual impact • Socio economic impact • Transport infrastructure and operations • ICT infrastructure	Standard operating procedures.
	The THREE STEP TECHNICAL CONSULTATIVE PROCESS led by the DM Case Officer is as follows: Step 1: Yield and Type Clarify the "yield" of the proposal in terms of unit density and/or floor factor GLA (as guided by TODC/Densification Policy or other applicable local framework) Negotiations on inclusionary housing should also be initiated and finalised in principle if applicable. Step 2: Urban design, environment and heritage Do a broader contextual evaluation of the proposal in terms of the City of Cape Town Urban Design Policy and TOD Design Parameters (refer to section 6 of this document). This should include environmental and heritage considerations Step 3: Transport operations and infrastructure Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects: • Access arrangements, Parking provision, Road schemes and width, NMT, Traffic circulation, Public transport The relevant study then needs to be submitted for pre-assessment after which a technical discussion will be arranged. During the technical discussion the <u>specific transport elements of the design directive will be confirmed</u>. Clarity should also be obtained by the applicant as to the availability of bulk utility services.				

APPLICATION TYPE	"Urban Inner Core" with access to <u>existing scheduled public transport</u> service within Structuring Corridors	"Urban Inner Core" with access to <u>planned scheduled public transport</u> within Structuring Corridors	Remainder of "Urban Inner Core" and "Consolidation" Areas	Discouraged Growth Areas	Critical Natural Assets
Subdivision of land	The main consideration in such an application is to achieve the "ideal block size" spectrum as advised by Urban Design Branch. Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	The main consideration in such an application is to achieve the "ideal block size" spectrum as advised by Urban Design Branch. Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	Standard operating procedures. For an application in the urban inner core area, cognisance should be taken of TODC and the applicant should address this in the motivation and design.	Standard operating procedures.	Standard operating procedures.
Consolidation of land	The main consideration in such an application is to achieve the "ideal block size" spectrum as advised by Urban Design Branch. Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	The main consideration in such an application is to achieve the "ideal" block size spectrum as advised by Urban Design Branch. Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	Standard operating procedures. For an application in the urban inner core area, cognisance should be taken of TODC and the applicant should address this in the motivation and design.	Standard operating procedures.	Standard operating procedures.

APPLICATION TYPE	"Urban Inner Core" with access to <u>existing scheduled public transport</u> service within Structuring Corridors	"Urban Inner Core" with access to <u>planned scheduled public transport</u> within Structuring Corridors	Remainder of "Urban Inner Core" and "Consolidation" Areas	Discouraged Growth Areas	Critical Natural Assets
Permanent Departure	Specific attention should be given to the following departure types: • Parking • Floor area • Height • Access requirements • Building line Departures granted should achieve the TODC yield and urban design guidelines, transport objectives and standards. Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	Specific attention should be given to the following departure types: • Parking • Floor area • Height • Access requirements • Building line The proposed design must include "flexible elements" so that it would be able to "retrofit" once the public transport service is in place. <i>(Specific specialist guidance to be provided by the Urban Design Branch).</i> Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	Standard operating procedures. For an application in the urban inner core area, cognisance should be taken of TODC and the applicant should address this in the motivation and design.	Standard operating procedures.	Standard operating procedures.
Consent, approval or any other permission or requirement in terms of the development management scheme	Consent granted should achieve the TODC yield and urban design guidelines, transport objectives and standards. Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	The proposed design must include "flexible elements" so that it would be able to "retrofit" once the public transport service is in place. <i>(Specific specialist guidance to be provided by the Urban Design Branch).</i> Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	Standard operating procedures. For an application in the urban inner core area, cognisance should be taken of TODC and the applicant should address this in the motivation and design.	Standard operating procedures.	Standard operating procedures.

Figure 20 Guidelines for assessing land use applications

b) Qualifying Criteria

- i) Those applications which would qualify for the pre-application consultation process are defined by geographic location within:
 - (1) The “Urban Inner Core” with access to existing scheduled public transport service within Structuring Corridors, or
 - (2) The “Urban Inner Core” with access to planned scheduled public transport within Structuring Corridors
- ii) Eligibility requirements for the fast-tracking of applications as per the Investment Incentives Policy include:
 - (1) **General Criteria** – The investment must constitute a new ‘external’ investment or the expansion of an existing investment in the area, and cannot simply be a relocation of businesses already based within the municipal boundaries of Cape Town.
 - (2) **Sectoral Criteria** – The investment must be in a sector which enhances the value-added production capacity of Cape Town. More specifically, the proposed investment should be located in the manufacturing sector. All investments in the manufacturing sector, subject to meeting the relevant criteria, are eligible for incentives. However, a number of specific manufacturing sub-sectors are prioritised by the City in alignment with the City’s strategic economic development objectives. These priority sub-sectors are derived from the City’s IDP and Economic Growth Strategy (EGS) and are in alignment with the Industrial Policy Action Plan 2013-2016. The incentives will be structured accordingly around this prioritisation.
 - (3) **Spatial Criteria** – Incentives for manufacturing sector investments will only be available in predetermined industrial nodes within the City. The targeting of specific areas for the provision of revenue-implication incentives is essential to ensure that the City’s development objectives are met, while affordability is maintained. Industrial nodes will be selected based on a process currently being undertaken in which business and industrial nodes across Cape Town are tracked by systematically assessing their current performance, long-term growth potential and suitability for incentives. They will also need to fall within the City’s identified integration zones. The designation of new spatial areas for application of the incentives will be approved by Council. The number of investment incentives approved and the extent of the time period for which applications will be taken will vary according to the specific spatial characteristics of the identified industrial nodes. Location-specific limits on the number of businesses which can obtain financial incentives in particular will ensure that the City can manage the fiscal cost of incentive provision while responding to the different development objectives the City has for different areas.
- iii) Financial incentives for manufacturing sector investments are only available in six industrial nodes within the City. These nodes have been selected based on an evaluation of their current performance, long-term

growth potential and suitability for incentives. The designation of spatially targeted geographic areas for incentives will be approved by Council from time to time. The areas where the manufacturing sector incentives currently apply are:

- (1) Atlantis Industria
 - (2) Triangle Farm
 - (3) Parow Industria
 - (4) Sacks Circle
 - (5) Landsdowne Industrial (known as Philippi North in ECAMP)
 - (6) Elsies River
- iv) The following sectors will be eligible for fast-tracked approvals as part of the investment incentives:
- (1) Broad Manufacturing Sector
 - (2) Priority Manufacturing Sectors:
 - (a) Agro-processing
 - (b) Green technology
 - (c) Electronics and electrical engineering
 - (d) Clothing and textiles
 - (3) Priority tertiary sector industries which include:
 - (a) Business Process Outsourcing (BPO)
 - (b) Information and Communication Technology (ICT)
 - (c) Tourism
 - (d) Film Industry

c) Costs or Risks

- i) Administrative costs to the municipality, undertaken by LUMS to ensure that qualifying criteria have been met.
- ii) Each geographic area may be subject to a limitation on the number of businesses that may access the financial incentives. The rationale for this limitation is to provide a mechanism for the active management of the fiscal impact of the financial incentive as well as being able to adapt to shifting development objectives across each geographic area.

d) Preconditions (When to use it)

- i) Targets areas with clear potential for economic growth but which is currently underperforming/lagging. This will be determined by the market potential and performance scores as revealed in the City's Economic Areas Management Programme (ECAMP). However, this is limited to manufacturing and tertiary sectors.
- ii) Financial incentives for manufacturing sector investments are only available in six industrial nodes within the City. These nodes have been selected based on an evaluation of their current performance, long-term growth potential and suitability for incentives. The designation of spatially targeted geographic areas for incentives will be approved by Council from

time to time. The areas where the manufacturing sector incentives currently apply are:

- (u) Atlantis Industria
 - (v) Triangle Farm
 - (w) Parow Industria
 - (x) Sacks Circle
 - (y) Landsdowne Industrial (known as Philippi North in ECAMP)
 - (z) Elsie's River
- iii) Broad Manufacturing Sector where there are investments resulting in more than 50 people being permanently employed within 24 months.
 - iv) Priority Manufacturing Sectors where there are investments resulting in more than 20 people being permanently employed within 24 months.
 - v) The investment must be in one of the City's priority tertiary sector industries
 - vi) The investment or expansion must be located in the spatially areas as approved by Council.

e) Timing

- i) Land use application - 3 months
- ii) Building plan decisions - 5 working days
- iii) Occupancy certificate – 10 working days

This incentive might change over the lifecycle of an area: The City's ECAMP work has demonstrated that economic areas move through cycles and that different interventions are appropriate at different stages in an area's lifecycle. This means that an area selected for incentives may lose that Investment Incentives Policy Final Approved May 2018 status in the future. Conversely, areas not selected initially may be targeted at a later stage as its context and performance changes.

f) Approval and Application process (where relevant)

- i) Approval

Approved as part of the City of Cape Town's Investment Incentives Policy. This is to be reviewed every two years. LUMS timeframes are only achievable where delegated applications are processed (i.e. no TIAs required).

- ii) Application

The fast tracking of applications approach as per the City of Cape Town's Investment Incentives Policy is applied as follows:

When an applicant is interested in this incentive or any other incentive offered in the City's Investment Incentive Policy, an initial meeting to be held between the investor and officials from the Investment Facilitation Unit (IFU) for the purpose of clarifying the requirements and scope of the investment incentive scheme and providing any additional information relating to:

- (1) Incentives available,
- (2) Qualifying and performance criteria,
- (3) Information required from the investor,
- (4) the administrative process and timeframes going forward.

Eligibility for the manufacturing sector incentives is based on the qualifying criteria and will be confirmed in an Incentive confirmation letter that will be signed by the Executive Director: Economic Opportunities and Asset Management

Eligibility for tertiary sector development will require approval by Council. Once approved by Council the investor will be informed by the IFU of the outcome in an Incentive confirmation letter that will be signed by the ED. This letter will also list the incentives that the investor is eligible for and any special conditions imposed by Council.

In order to take up the development application fee waivers and fast tracking incentives the investor will submit their incentive confirmation letter together with their development applications. Both must be submitted electronically via the Development Application Management System (DAMS) portal.

Once submitted the client must alert the IFU who will in turn alert the Customer Interface official and request the waiver of the submission fee¹. Once the fee is waived the application can be processed further within DAMS. The Customer Interface office will keep record of the value of the waived application fees and send this to the E&I Department for quarterly uptake capturing purposes.

A summary of the application process is depicted in Figure 21 below. Full details can be found in CCT Standard Operational Framework for the Administration of Investment Incentives (2019).

This incentive applies to all land use and building plan applications by qualifying investments conditional on submission of suitably completed and compliant applications

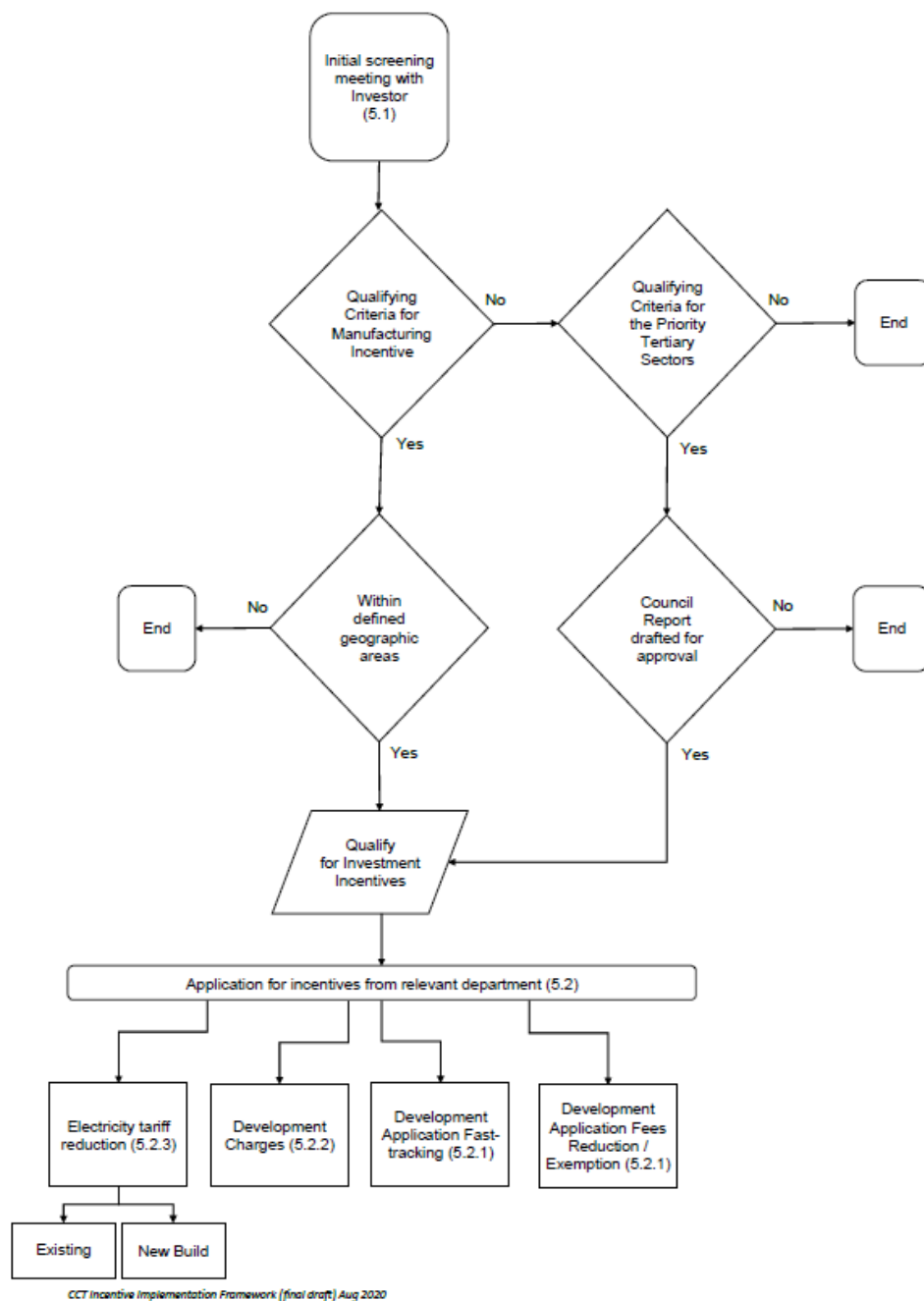


Figure 21 Application Process

However, the pre-application consultation approach utilised by the TOD Manual for Development Management can be expanded to be applied beyond its current criteria. Currently, the 3 Step Technical Consultative Process has a narrow scope of applicability, applying to those developments within areas of the Urban Inner Core with access to existing or future public transport service within structuring corridors. Additional areas to be considered for the fast-tracking of land use and building application approvals includes the Development Focus Areas. **Development Focus Areas** are those areas with highest level of accessibility and highest transformative impact, where dedicated infrastructure capacity and budget is required to facilitate development. This does not imply that other areas cannot be identified as areas of development focus for the duration of the District Plans. Further application of the pre-application process can be made by recommending that a blanket approach is taken with regards to land use applications throughout areas such as the Urban Inner Core and Restructuring Zones that makes the pre-application consultation mandatory.

g) Advantages and Disadvantages

Advantages	Disadvantages
• Reducing delays in processing of land use applications can dramatically assist in commencing of projects. • Is already approved as part of City Investment Incentives Policy – no additional process required • All necessary line departments are consulted in pre-application process which ensure a holistic engagement approach • Pre-application process ensures that private sector is fully informed regarding the necessary inclusions into their application which allows it to be processed without the need for revisions once submitted	• Limited scope of applicability of mechanism – only six areas within CCT are targeted for this incentive • Only two economic sectors targeted – could be expanded to include other sectors • The pre-application process will require staff to engage with development companies and may require additional staffing requirements if there is a greater uptake in this approach.

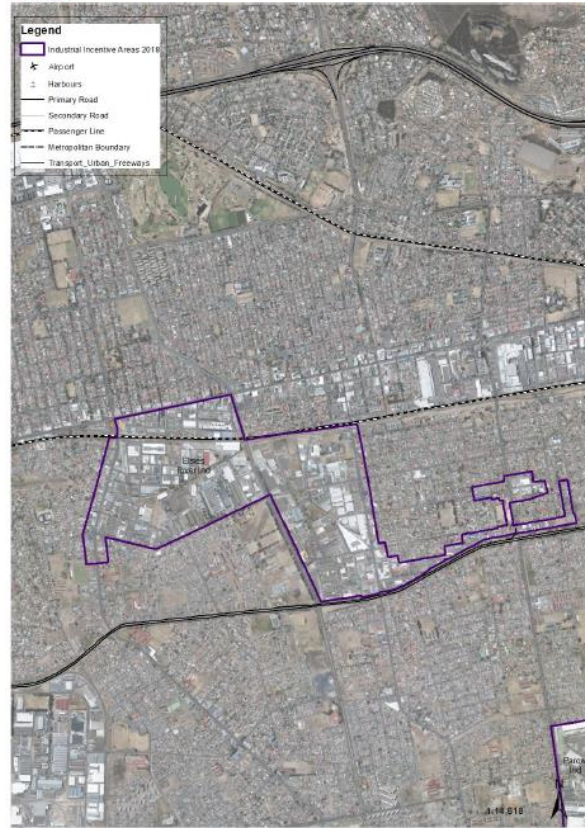
h) Targeted Areas

Incentives for manufacturing sector investments are currently only available in six industrial nodes within the City. These are Atlantis SEZ industrial area, Triangle Farm, Parow Industria, Sacks Circle, Landsdowne Industrial (known as Philippi North in ECAMP), and Elsie's River. The maps below depict geographic areas for manufacturing incentives which include the fast-tracking of land use and building plan applications as per the City's Investment Incentives Policy:

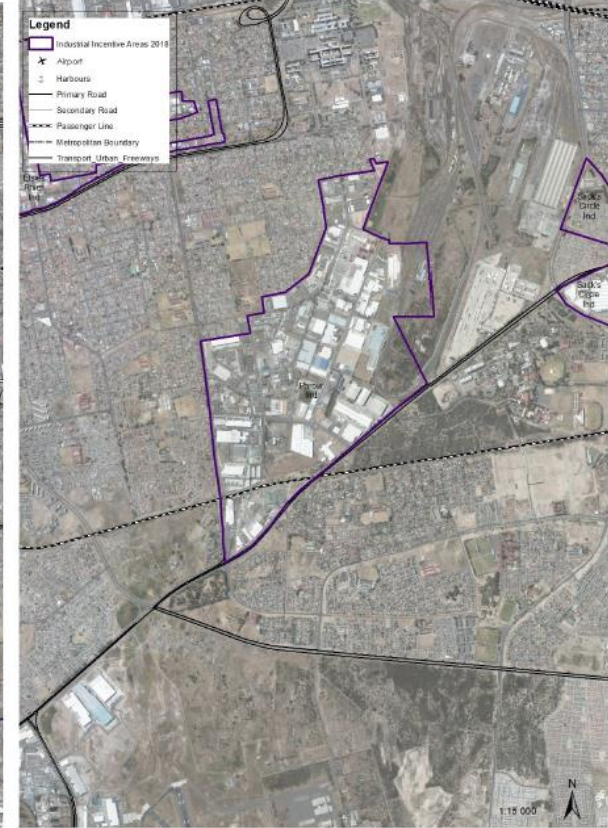
Atlantis Industrial Area



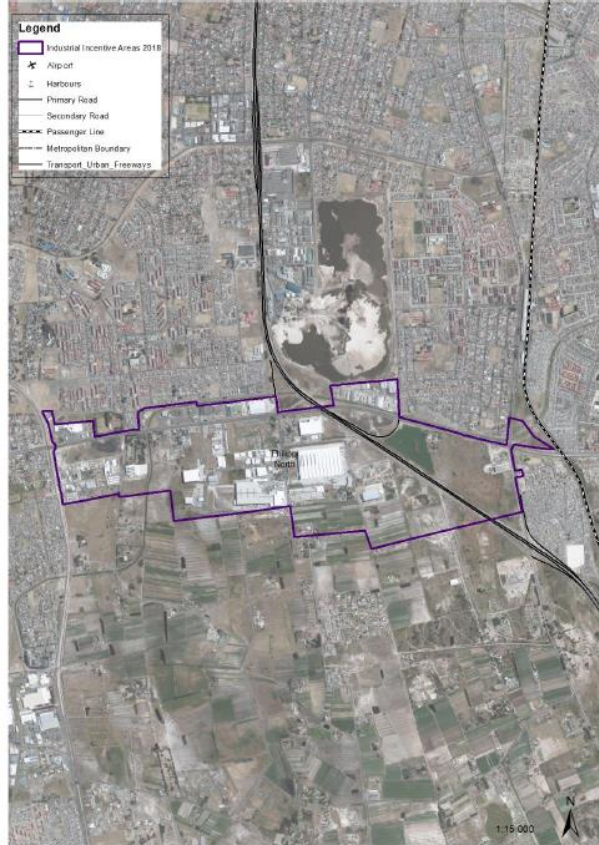
Elsies River



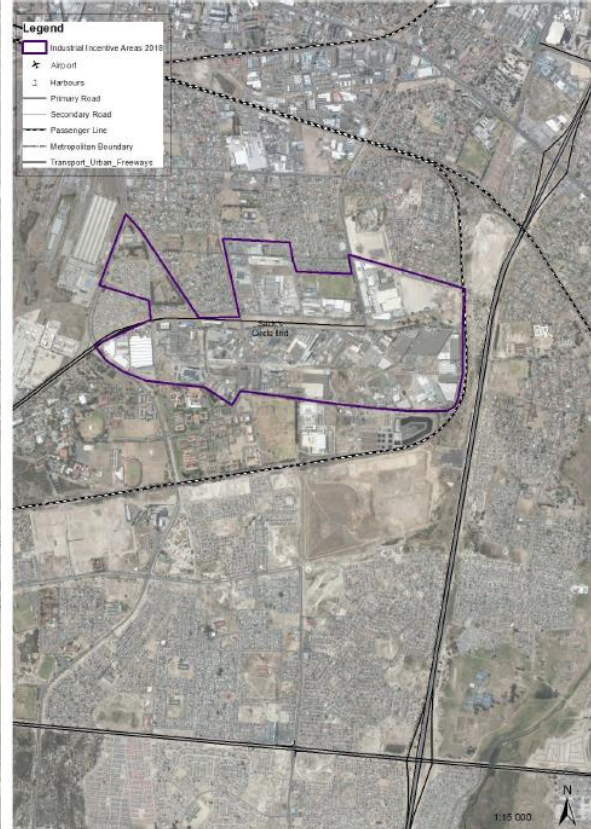
Parow Industria



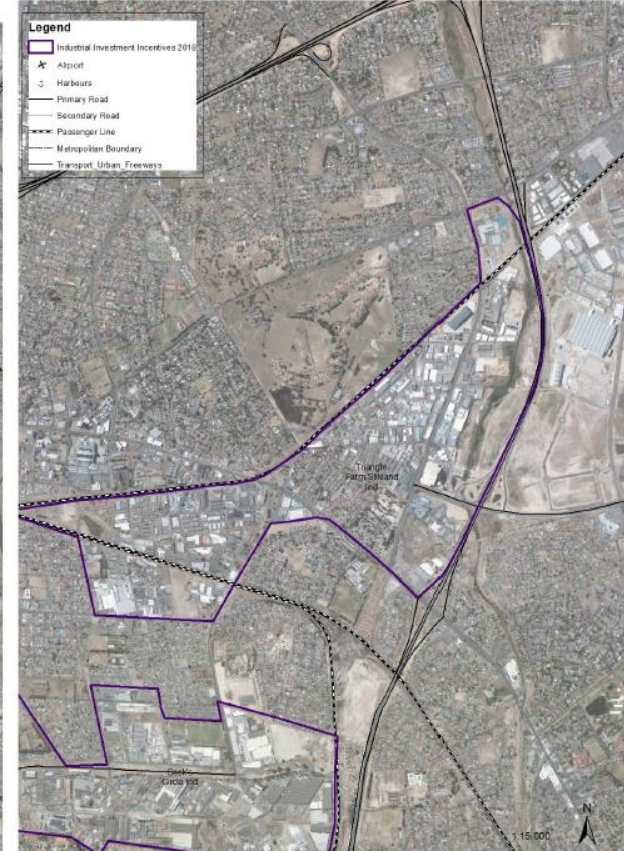
Philippi North



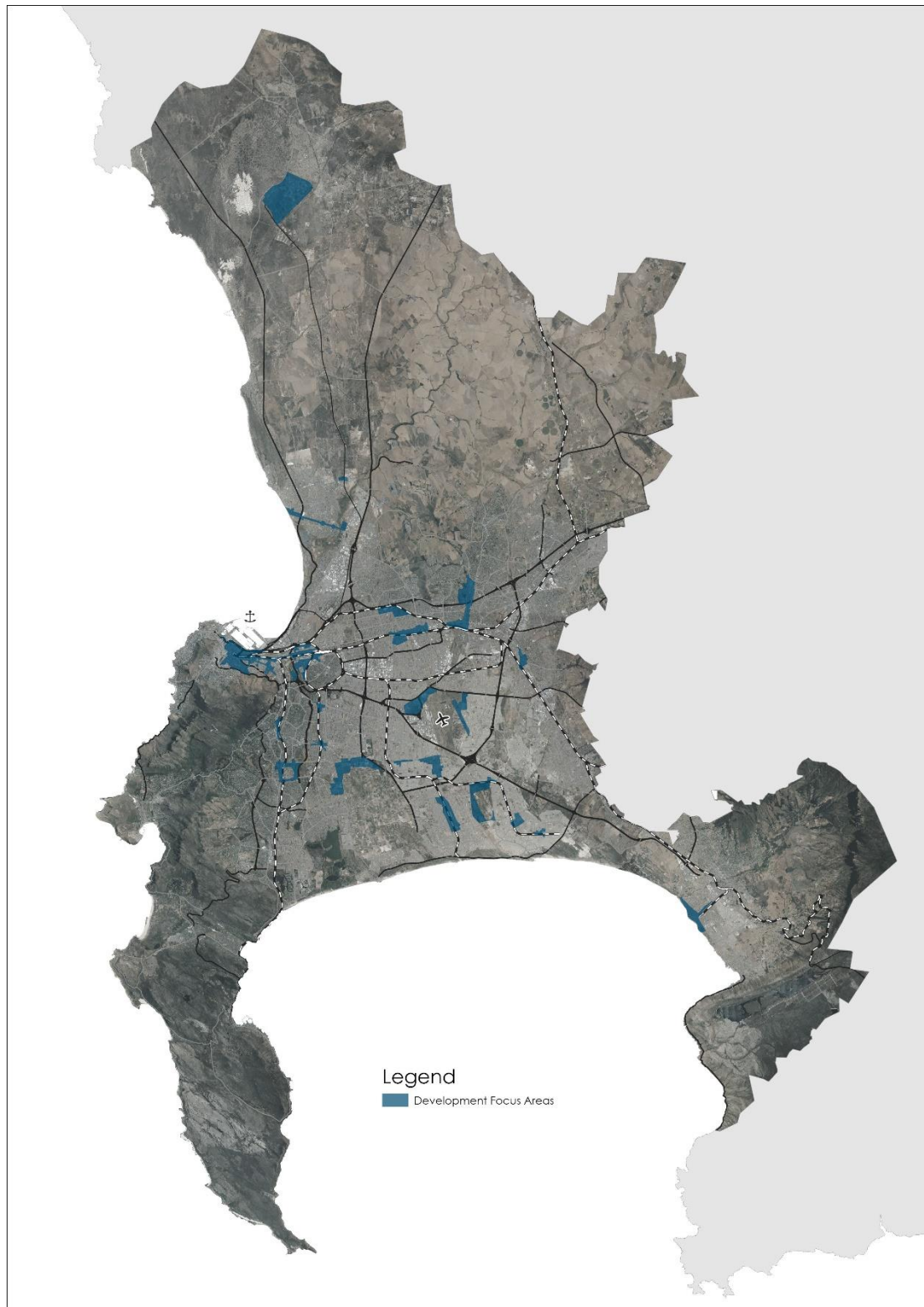
Sacks Circle



Stikland/Triangle Farm



Additional areas to be considered for the fast tracking of land use and building application approvals includes the Development Focus Areas. The following map displays Development Focus Areas across the Metro region.



Special Rating Areas (SRA)/City Improvement Districts (CIDs)

A SRA is a clearly defined geographical area in which property owners pay additional property rates to fund “top up” municipal services to improve or upgrade that specific area. SRAs can be commercial, industrial, residential or a combination of any of these and are known as Improvement Districts, City Improvement Districts, Business Improvement Districts, or Community Improvement Districts.

Focus Area:

- Community driven, local area scale intervention
- Commercial, industrial, residential areas (or a combination)
- Areas requiring/desiring improved services.

Project Type:

- A non-profit company provides "top up" services which typically include:
 - additional public safety;
 - cleansing services;
 - urban maintenance;
 - upgrading of the environment; and
 - social upliftment

Goal:

- a well-established institutional model and funding mechanism for communities who wish to enjoy municipal services of a higher level, and who are prepared to pay extra for these additional services. The purposes of a special rating area is to:
 - enhance and supplement the municipal services provided by the City;
 - facilitate investment in the special rating area;
 - facilitate a co-operative approach between the City and the private sector in the provision of municipal services;
 - halt the degeneration and facilitate the upliftment of distressed business and mixed-use areas;
- provide a framework to ensure the services provided remain affordable and sustainable.

a) How it works:

- i) An SRA is always initiated by the community and is run by the community for the benefit of the community, not by the City.
- ii) An SRA is managed by a specifically set-up Non-profit Company (NPC) with board elected by members of the NPC. Operations are undertaken by a management team appointed by this board. Property owners are required to sign up for NPC membership.
- iii) An SRA is funded from the additional rates paid by property owners within the boundary of the SRA. The contributions are based on the SRA's budget which undergoes an annual approval process. The City collects these additional rates on behalf of the SRA.
- iv) The City is not involved in their day-to-day operations, but merely exercises financial oversight and legal compliance. The City does not see its role as advocating or initiating the establishment of special rating areas, but rather

facilitating the process with guidance and advice and assisting and helping to capacitate management bodies.

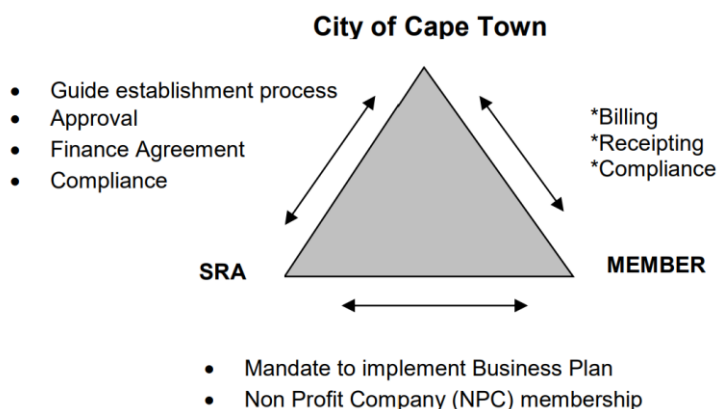


Figure 22 Overview of the relationship between the City, SRA and the member.

b) Costs or Risks

- Only minor administrative costs to the municipality.
- Potential risks associated with regeneration of areas.
- Requires a rates base that can support the SRA. (i.e. not applicable in all areas)
- Lack of local capacity / resources may undermine co-funding model.
- CIDs only effective where requisite human and financial resources exist within a precinct. May not be appropriate or feasible for smaller, more marginal precincts.
- Risk of 'shadow effect', whereby businesses and properties located adjacent to the CID area experiences a rise in crime-and-grime.

c) Preconditions (When to use it)

In communities with a sufficient rates base to support the SRA.

d) Timing

Not Applicable. The City does not initiate the establishment of the SRA, but rather facilitates the process at the behest of the community.

e) Approval and Application process

- Approval

SRAs are an existing mechanism governed by Section 22 of the Municipal Property Rates Act (MPRA), the Municipal Finance Management Act (MFMA), the Companies Act (Non Profit Company - NPC), the SA Constitution and the City of Cape Town's Special Rating Area By-law of 2012. The City also has the Special Rating Areas Policy 2017/18.

- Application

A community, or members thereof, are required to compile a five-year business plan (including the motivation report, the implementation plan and a budget) indicating

how the improvements are to be achieved, and present this at a public meeting. Thereafter a proportion of property owners are required to give written consent/support (50% in a commercial area, 60% in a residential area). An application is then submitted to the City for final approval process.

f) Advantages and Disadvantages

Advantages	Disadvantages
- Does not require utilizing any capital resources or debt to implement - Results in improved service delivery and urban management that does not require municipal finance - The cost of providing supplementary services will be borne by all property owners - Costs are borne in proportion to the value of the property - The Special Rating Area approach is holistic - The Special Rating Area creates a positive identity for the area - The Special Rating Area provides private sector management and accountability - The improvement of property values	- Requires a rates base that can support the SRA. (i.e. not applicable in all areas) - Lack of local capacity / resources may undermine co-funding model. - CIDs only effective where requisite human and financial resources exist within a precinct. May not be appropriate or feasible for smaller, more marginal precincts. - Risk of 'shadow effect', whereby businesses and properties located adjacent to the CID area experiences a rise in crime-and-grime. - In some areas there may be unintended consequences related to urban regeneration including increased rentals, and displacement of informal traders and the homeless.

g) Targeted Areas:

- i) There are several CIDs operating in the City in a range of communities, for example:
 - a) Athlone CID
 - b) Blackheath CID
 - c) Cape Town Central CID
 - d) Claremont CID
 - e) Epping CID
 - f) Groote Schuur CID
 - g) Maitland CID
 - h) Observatory CID
 - i) Paarden Eiland CID
 - j) Parow Industria CID
 - k) Sea Point CID
 - l) Triangle Farm City Improvement District
 - m) Vredeloof Community Improvement District
 - n) Woodstock CID
 - o) Wynberg CID
 - p) Zeekoevlei Peninsula SRA

12.8.1.4. Public Sector Investment Mechanisms

Catalytic Land Development Programme (CLDP)

Cape Town's CLDP is currently defined as a long term, comprehensive regeneration process aimed at tackling deep-seated social, economic, physical and environmental problems of market failure and deprivation which blights many inner-city communities.

Focus Area:

- A portfolio of 'priority TOD catalytic projects' of metropolitan significance, these being Bellville CBD Opportunity Area, Philippi Opportunity Area and the Foreshore Precinct;
- A portfolio of Level 2 TOD initiatives in local transit-accessible secondary precincts and nodes; and
- Other public land development opportunities around prioritised stations with high ridership that form part of the existing rail and BRT Station Typology Initiative proposed in partnership with PRASA and other role players.

Project Type:

- typically initiated by public sector, requiring government approval, support and co-ordination;
- capital intensive and unlikely to be undertaken by the private sector alone
- include high initial risk profiles with a return on investment difficult to predict with certainty, which mitigates against private sector participation;
- given their scale, can support government's socio-economic objectives, move the economy onto a new and more inclusive growth trajectory and stimulate employment opportunities; and
- requires unique delivery capacity/vehicles that enables infrastructure delivery in a commercially viable and sustainable manner.

Goal:

- the prioritisation of TOD and densification through residentially-led, urban compaction of catalytic, transit accessible precincts, supporting a fiscally sustainable public transport system and enabling a more productive, liveable and resource-efficient Cape Town;
- optimised efficiency due to the right mix and intensity of land uses in such catalytic precincts; and
- leveraging its strategically well-located landholdings and public partnerships to attract greater private sector participation to achieve TOD.

a) How it works:

- i) The CLDP is a portfolio-based approach to the prioritisation and assembly of TOD projects and programmes for the City, adopted on 31 July 2019 and developed in compliance with National Treasury's Catalytic Land Development Guideline.
- ii) The Catalytic Land Development Programme (CLDP), forming part of the City's TOD programme, will facilitate the creation of high-density, mixed-use development in spatially targeted, transit-accessible precincts and blighted economic nodes throughout the urban inner core, which, together with the requisite bulk infrastructure investment, will give effect to the TOD Strategic Framework (2016) over the medium to long term.

- iii) The CLDP requires a successful focus on people and places, a long-term approach, close partnerships, co-operation between public and private sectors, strong local leadership and the active involvement of communities.
- iv) The CLDP consists of several elements including the review of the of the previous TOD Catalytic Projects Programme, resulting in the prioritisation of three catalytic projects:
 - Bellville Opportunity Area
 - Philippi Opportunity Area
 - Foreshore Precinct

These will be followed by the next, supporting level of TOD initiatives, which will typically be smaller in size and/ or driven by the private sector. These level-2 initiatives might also have a more specific focus, such as housing or commercial.

The station typology initiative will see the development of public land in prioritised TOD precincts amongst the city's existing 98 rail and 40 BRT stations, in partnership with PRASA and other role players. It will contribute to improved urban efficiencies and sustainable transport services and forms another component of the CLDP.

Furthermore, the City will investigate and develop a suite of spatial incentives to support development in prioritised TOD precincts forming part of the Catalytic Land Development Programme (CLDP), to complement the City's existing Investment Incentives Policy. This will include investigating the potential of preferential development contributions in TOD locations, supply of serviced land, extending the Urban Development Zone (an accelerated depreciation allowance that seeks to stimulate development in blighted parts of the City), proactively applying exemption overlays where heritage impact is absent or limited, exploring the applicability of such concepts as 'Innovation Districts' in association with tertiary academic institutions to stimulate the 'knowledge economy', and the potential of 'Enterprise Zones' where appropriate.

- v) National Treasury through its City Support Programme (CSP) published guidelines for Metros formulating, preparing and implementing catalytic land development programmes. The guideline recommends a three phase approach to the catalytic land development life cycle:

1. Phase 1: Spatial planning and targeting;

2. Phase 2: CLD programme preparation;
3. Phase 3: Implementing projects within the catalytic programme.

Currently Urban Catalytic Investment has focused on Phase 1 and 2. Applied to 3 previous sets of proposed 'catalytic' projects:

- 27 TOD Game changer sites;
- IDP Level 1 catalytic projects ("5+2" Revised = "3+2"); and
- PRASA "station typologies" initiative sites

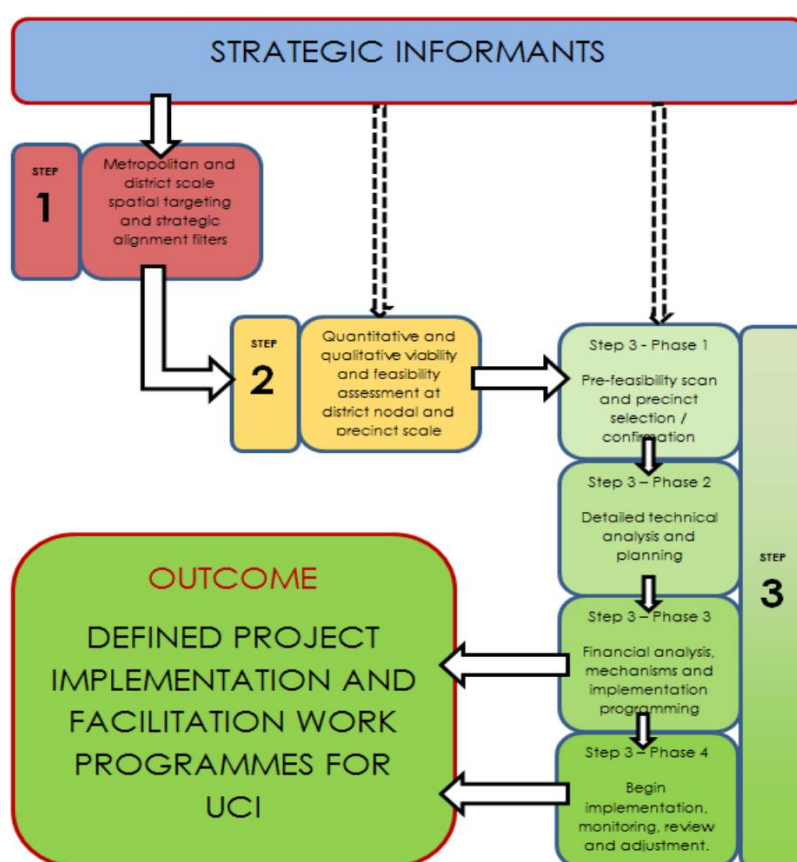


Figure 23: Overview of the CLDP Methodology

b) Costs or Risks

- i) Capital intensive.
- ii) include high initial risk profiles with a return on investment difficult to predict with certainty.
- iii) large scale projects with complex internal and external institutional arrangements.

c) Preconditions (When to use it)

Projects that are:

- i) typically initiated by public sector, requiring government approval, support and co-ordination;
- ii) capital intensive and unlikely to be undertaken by the private sector alone
- iii) include high initial risk profiles with a return on investment difficult to predict with certainty, which mitigates against private sector participation;
- iv) given their scale, can support government's socio-economic objectives, move the economy onto a new and more inclusive growth trajectory and stimulate employment opportunities; and
- v) requires unique delivery capacity/vehicles that enables infrastructure delivery in a commercially viable and sustainable manner.

d) Approval and Application process (where relevant)

- (i) Approval
- (ii) Application

e) Advantages and Disadvantages

Advantages	Disadvantages
• Programme to deal with strategically well-located landholdings. • Holistic approach and structured programme to project implementation and facilitation, a unique delivery capacity/vehicle. • Programme aims to ensure co-ordination between government institutions and the private sector. • Aims to attract greater private sector participation to achieve TOD. • Supports the City's policy objectives by incentivising dense development.	• Projects include high initial risk profiles with a return on investment difficult to predict with certainty • large scale projects with complex internal and external institutional arrangements. • capital intensive

f) Targeted Areas

- i) TOD precincts, where demand exists, land opportunity. E.g. Bellville PTI and surrounds
- ii) See list above and project portfolio.

Land Acquisition including Land Banking and Assembly

Focus Area:

- Areas where future land value is identified
- Infill development
- TOD precincts

Project Type:

- Areas where there is an identified need that the City can fulfil (i.e. public housing)
- Servicing of land parcels
- Areas with existing or planned public transport

Goal:

- The City seeks to facilitate public investment into capital projects.
- Land banking and assembly will prepare land for future projects and can be used as income generating either through disposal or leasing of packaged land.
- Additionally, this would encourage private sector development by displaying public sector willingness to enter into medium and long term infrastructure driven projects.

a) How it works:

- i) The City can buy property or rights in property (servitude) for municipal purposes. Examples of this are land parcels which are required to build roads, reservoirs, pipelines or housing projects.
- ii) Prior to purchasing a property or rights in property the City first has to collect information about the land property, including who owns it and what the land is worth and negotiate with the owner of the property to buy the land.
- iii) Mayoral Committee grants permission for the purchase of land. After the necessary permission is granted, a purchase agreement is drafted and signed by the two parties (City and owner).
- iv) Land banking and assembly entails that the City acquire aggregate parcels of land near or within strategic transit precincts where local development is expected to dramatically increase the plot's value.
- v) The banking of land for future use is useful especially in areas where the right type of development is not immediately possible.
- vi) As part of the land banking and assembly approach, large land holdings bought in recent years will be planned, subdivided and converted into projects in order to create integrated settlements.
- vii) The City can leverage its strategically located landholdings and partner with the private sector to lead by example in achieving TOD development.
- viii) Such investments will stimulate economic activity in support of growth, development and jobs, and unlock more affordable housing opportunities.

b) Costs or Risks

- i) Capital costs incurred in the purchasing of land for the proactive land acquisition strategy.
- ii) Additional capital costs are incurred in the holding costs, demolishing of structures, loss in rates income, opportunity costs.
- iii) Land banking and assembly requires the purchasing and packaging of land and selling leasehold rights to private developers. Cost to the City is in the purchasing of land and potentially the opportunity cost if there is no uptake from developers.
- iv) Administrative costs to the municipality, to ensure that land acquired by City line departments is used correctly and in the holding and managing of land.
- v) May be legal requirements for purchasing land for reinvestment by the municipal authority.

c) Preconditions (When to use it)

- i) When land value is favourable for public investment.
- ii) Where the municipality would like to encourage development of a public/social benefit not available through the private market.
- iii) There is sufficient operational capacity to structure agreements with the private sector

d) Timing

Both the acquisition of land by the City and the process of land banking and assembly occur prior to development occurring on the land.

e) Approval and Application process (where relevant)**i) Approval**

The process of asset acquisition is detailed in the City of Cape Town Policy on the Management of certain of the City of Cape Town's Immovable Property Policy (2010) A Land Acquisitions and Disposals Strategy is being drafted by the Property Management Department which will give further direction to the conditions and criteria applicable to the strategic acquisition, holding and disposal of land assets. Additionally, a consolidated land pipeline is required so as to better coordinate and align spatial and infrastructural planning.

ii) Application

The acquisition of land by the City should be done in line with the City's spatial vision and development objectives, specifically in line with the IDP, TOD framework and MSDf/DSDf. The development of a consolidated land pipeline will assist in ensuring that there is integration between spatial planning and infrastructure planning in the acquisition of land.

f) Advantages and Disadvantages

Advantages	Disadvantages
- Currently the City has the power to acquire parcels of land from external parties for specific municipal uses. - Useful tool for ensuring that long-term development goals are met - The City is able to direct specific forms of development on targeted parcels of land. - Land packaging/assembly is a practice utilised by the City to ensure that land parcels are directed towards their correct use	- Land parcels have been purchased from the private market, with a large mark-up, years after the City previously sold it Example? - Requires large capital investment by the City to both purchase the land and in the Capex required for planned projects - Expropriation has negative public perception - May require Special Purpose Vehicle to manage land acquired for land banking purposes.

g) Lessons Learnt

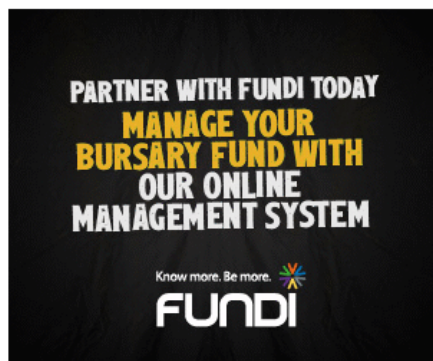
City land lying unused three years after R400m purchase

By Marvin Charles  Oct 2, 2018



Cape Town - The City of Cape Town has come under fire after buying land for R400 million in the Helderberg/Stellenbosch area in 2015 and three years later not indicating what it wants to do with it.

Chairperson of the Helderberg Residents Association Stephen Leppan said: "According to my observation they are still studying the land, but the city has not been forthcoming with information on what they plan on using the land for."



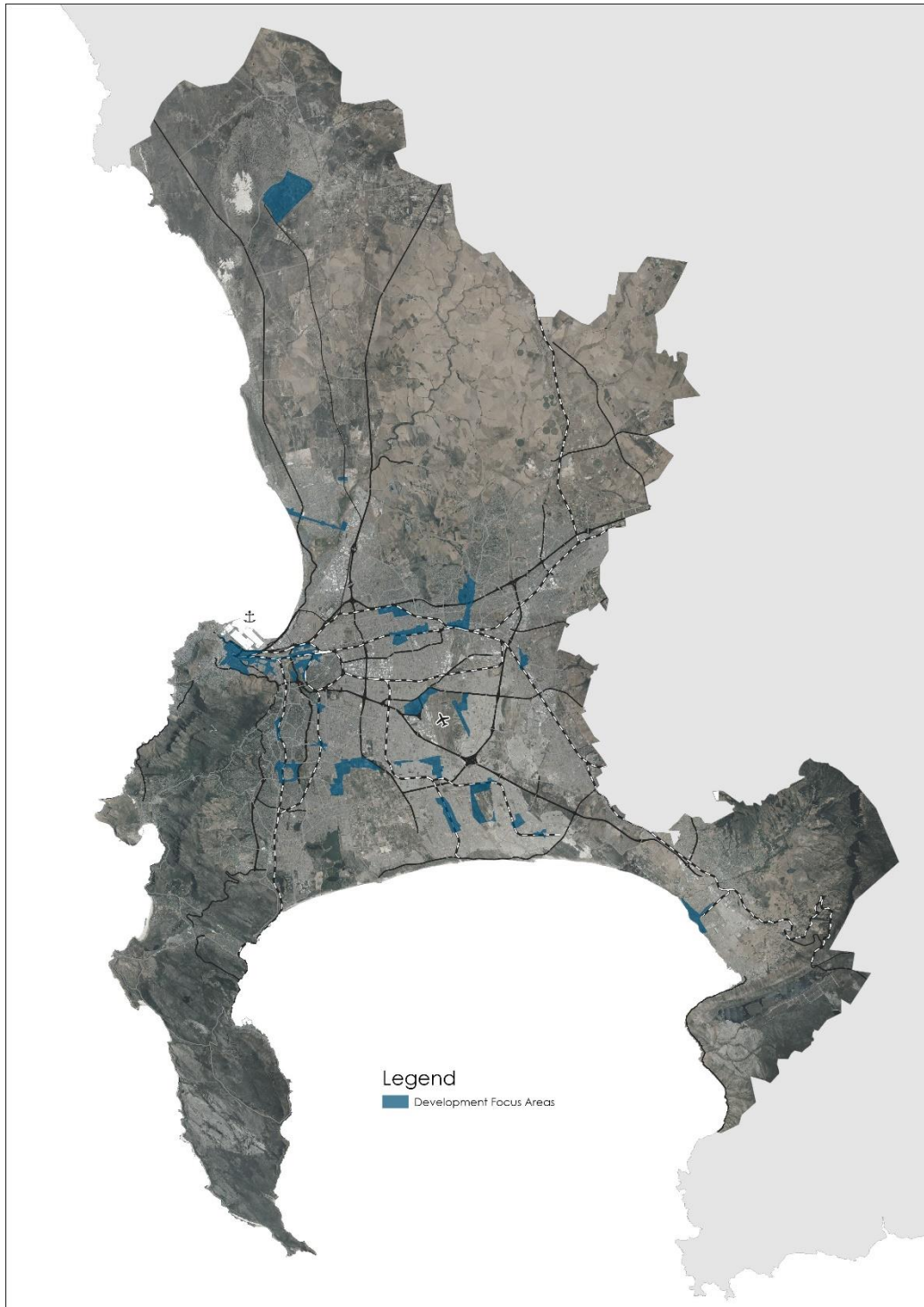
Leppan said the area was struggling with massive infrastructure problem in that there was a shortage of houses and schools.

According to documents in the possession of the Cape Argus, the City bought the land from Paardenvlei Properties on June 2015. The documents also state that the city was informed that parts of the land's ground water may be contaminated.

"The seller (Paardenvlei Properties) has made certain disclosures regarding the extent and nature of the contamination of the immovable property. The purchaser (the City) acknowledged that it had undertaken an

h) Targeted Areas:

- i) TOD Catalytic projects and Development Focus Areas
- ii) Integration Zone Precincts
- iii) Catalytic land



Precinct Management Model

A pilot a precinct management approach that will utilise Expanded Public Works Programme (EPWP) workers to address urban decay and improve areas so that they are clean, safe, functional and attractive.

Focus Area:

- Neglected Urban centres - CBDs, community nodes and town centres
- Urban areas experiencing decay without enough of a rates base to support the establishment of an SRA.
- local area scale intervention.

Project Type:

- Government driven urban management model
- Improving safety, quality of life and socio-economic circumstances
- Public infrastructure and facility maintenance

Goal:

- Precincts which are improved in a sustainable manner to make them clean, safe, functional and attractive, increasing economic activity and decreasing crime in the area.
- The overarching aim is to increase footfall and get people to reconnect with the space so that they visit it more frequently.
- The model aims to 'breathe life' into the precinct.

a) How it works:

- i) This holistic approach will utilise existing MURP methodologies in an innovative way by focusing resources on a small but significant area which can then be built on and expanded over time.
- ii) Currently the programme focusses on:
 - (a) precinct safety;
 - (b) cleaning & urban management;
 - (c) precinct beautification;
 - (d) marketing, communication & public relations;
 - (e) and events and activations.
- iii) This model will utilise EPWP workers over a two-year period (as opposed to the standard three-month contract). These individuals will be provided with accredited training in a variety of skills from safety and security, cleaning skills and rudimentary maintenance that are integral to the upkeep of buildings and spaces used by the public, to waste management and events logistics.
- iv) This model will also work together with existing initiatives like the Neighbourhood Safety Teams (NSTs). In addition, a series of different types

of events and activations of various scales will take place, aimed at building social cohesion and drawing positive energy into the area.

b) Costs or Risks

- i) Cost of the programme borne by the municipality and government partners.
- ii) Extensive Capex and Opex expenditure.
- iii) Requires ongoing management and dedicated resources from the Municipality.

c) Preconditions (When to use it)

- i) In areas requiring intervention to prevent urban decay or improve existing urban management levels that do not have enough of a rates base to support the setup of an SRA.
- ii) Neglected and dysfunctional areas that require upliftment.
- iii) Where there is sufficient capacity in the municipality to assign a dedicated team to administer the program.

d) Approval and Application process (where relevant)

- (i) Approval
- (ii) Application

e) Advantages and Disadvantages

Advantages	Disadvantages
• A holistic approach to precinct management that ties in with a variety of existing City programmes. • Provides skills and jobs as part of the EPWP structures. • Falls within the existing City structures (MURP and Subcouncil structures.)	• Requires a direct revenue source for a municipality (both capex and opex) • Requires sufficient capacity in the municipality to assign a dedicated team to administer the program. •

f) Lessons Learnt

- i) Pilot the precinct management model in the Bonteheuwel CBD

g) Targeted Areas

- i) Aim to commence the model in the precincts of Bonteheuwel Town Centre and Bishop Lavis in November 2020.
- ii) Aim to roll-out Precinct Management as part of the Mayor's Visible Service Delivery Acceleration Programme (MVSA), which has been adapted to meet local conditions in 23 areas.

Mayoral Urban Renewal Programmes (MURPs)

City programme that employs short term urban management solutions and oversees the development of a more comprehensive community action planning process in identified Areas of Focus. The programme aims to uplift areas that have been identified as neglected and dysfunctional through coordinated service delivery and operations within spatially defined area.

Focus Area:

- Neglected and dysfunctional urban areas – specifically CBDs, community nodes and town centres
- Degraded public transport interchanges and commercial corridors

Project Type:

- Urban stabilisation through public infrastructure and facility maintenance
- Set up of Area Coordinating Task Teams
- Improving safety, quality of life and socio-economic circumstances

Goal:

- The objective of MURP is to uplift former neglected and dysfunctional areas.
- Provide a platform for effective public and private investment.
- Unlock immediate action through transversal cooperation between line departments and improved partnerships with communities, and to concurrently plan for the future of the area based on a participatory approach.

a) How it works:

- i. MURP employs short term urban management solutions and oversees the development of a more comprehensive community action planning process in identified Areas of Focus. that draw from the best practices developed under the Violence Prevention through Urban Upgrading Programme
- ii. process premised on a strong social crime prevention approach. The programmes aims to progress towards the realisation of a community policing programme and integrated neighbourhood safety programme based on the work piloted by MURP in areas presently suffering from severe gang activity.
- iii. the programme plays a catalytic or 'unblocking' role around minor urban management issues that struggle to receive attention.
- iv. These investments are articulated in a package of interventions which are negotiated with communities and incorporated into "Community Action Plans

- or Area Strategies" via the establishment of Area Coordination Task Teams or ACTTS in each identified Area of Focus.
- v. MURP focuses on hotspot areas where the social fibre has broken down.

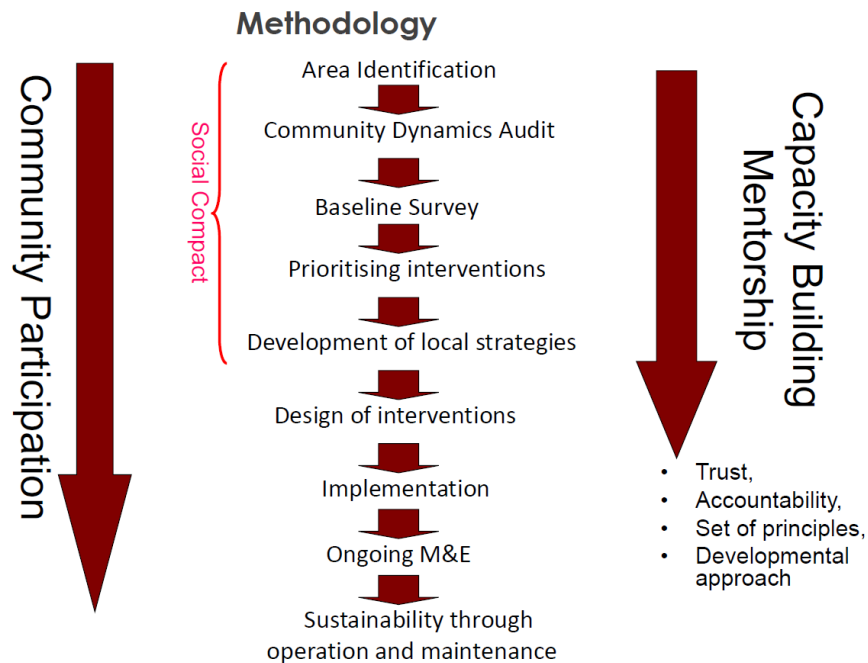


Figure 24: Methodology

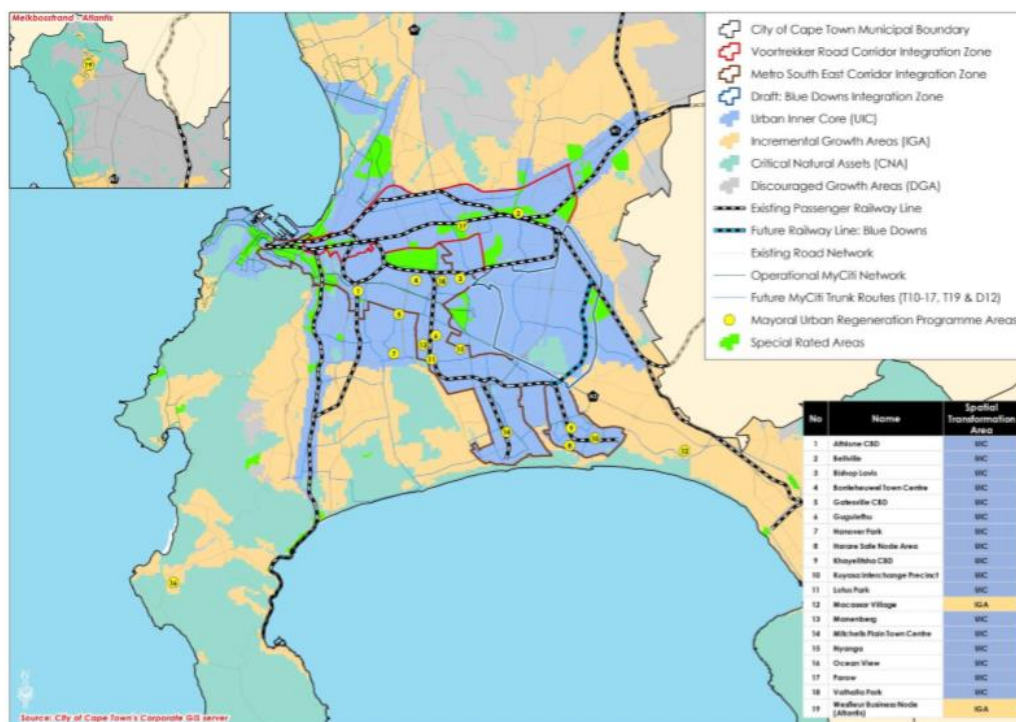


Figure 25: MURP Areas

b) Costs or Risks

- i) Capex and Opex expenditure required.
- ii) Lack of funding may impede project progress.
- iii) Requires institutional capacity and management
- iv) Differential with respect to levels of service provided in MNURP Focus Areas relative to other areas in City.

c) Preconditions (When to use it)

- i) In neglected or dysfunctional areas across the metro.
- ii) Specifically, in environments that have become conducive for criminality and violence where proactive and positive urban management has become almost impossible and where the rule of law is difficult to achieve for the benefit of residents.
- iii) Lack of alternative funding sources for improved urban management.
- iv) If areas are chosen where there is a current investment focus then there is a chance that through a more integrated approach to planning and design, sustainable operations and maintenance becomes possible.

d) Approval and Application process (where relevant)

- (i) Approval
- (ii) Application

e) Advantages and Disadvantages

Advantages	Disadvantages
• By improving the quality and reliability of basic service provision, market uncertainty is reduced and perceptions improved. • Results in the development of a public or a social good and the upliftment of neglected areas • Encourages the maintenance of public infrastructure and facilities. • Holistic approach to urban management. • Provides a co-ordinating platform.	• Ongoing Capex and Opex expenditure. • Requires institutional capacity. • Working in volatile environments. • Precondition for regeneration but not sufficient in itself.

f) Lessons Learnt

- i. MURP areas include Athlone CBD, Bellville transport interchange and Voortrekker Road corridor, Bishop Lavis, Valhalla Park, Bonteheuwel, Gatesville CBD, Harare and Kuyasa transport interchanges, Macassar, Manenberg, Hanover Park, Mitchells Plain Town Centre, Nyanga/Gugulethu, Ocean View, Parow and Wesfleur business node (Atlantis).
- ii. MURP often works alongside the Violence Prevention through Urban Upgrade (VPUU) programme.

g) Targeted Areas

- i) Areas of infrastructure neglect i.e. Dunoon.

12.8.2. PROPOSED MECHANISMS

The mechanisms described in this section have passed through the rapid screening process and were deemed to be suitable both in terms of the time required for them to be developed as well as their potential for use. These mechanisms are either, currently in the process of development or investigation by the City or should be investigated in more detail prior to pursuit and implementation. It should be noted that this is not an exhaustive list of mechanisms and this does not preclude the investigation of other mechanisms to support the City's urban development vision. Timeframes for approval (for mechanisms under current investigation) and investigation of future mechanisms are indicated as either A, B or C, where A refers to those mechanisms which can be approved in 1 – 2 years, B indicates those that can be approved in 2 – 5 years and those that are timeous to be investigated but can be done within the lifespan of the District Plans are noted as C, or 5 – 10 years.

Table 17 Proposed Mechanisms and Expected Timeframes

Mechanism	Timeframes: A: 1-2 years, B: 2-5 years, C: 5-10 years
DEVELOPMENT INCENTIVES	
Integrated Incentive Overlay Zone	A
Scheduled Public Transport Accessibility Overlay (SPTAO)	A
Inclusionary Housing	A
Density Bonus	A
Proactive Rezoning/Upzoning	A
Heritage Exemption Areas	B
Environmental Exclusion Areas	B
Tax Abatements (other than the UDZ)	C
INCOME GENERATION	
Land Readjustment Scheme	C
Land Redevelopment Scheme	C
INSTITUTIONAL	
Enhanced Process of Land Release and Acquisition	A
PUBLIC SECTOR INVESTMENT	
Aligned Public Sector Plans	A

12.8.2.1. Development Incentive Mechanisms

Overlay Zones

Focus Area:

- Urban areas / Districts / Corridors
- Environmental / heritage areas for conservation and protection
- Historical districts, natural resource and green infrastructure protection, and economic development
- New development Areas

Project Type:

- Encourage mixed use developments within a district
- Preserve / enhance natural areas
- Preserve / enhance sensitive / wildlife habitat
- Protect groundwater resources and protect quality of surface water
- Affordable Housing along transit routes and corridors

Goal:

- The goal is to provide regulations or incentives to protect a specific area or guide development within a special area.

a) How it works:

- i) Overlay zoning is a regulatory tool that creates a special zoning district, placed over an existing base zone(s), which identifies special provisions in addition to those in the underlying base zone.
- ii) An overlay zone is a zoning district which is applied over one or more previously established zoning districts, establishing additional or stricter standards and criteria for covered properties in addition to those of the underlying zoning scheme.
- iii) The CCT often use overlay zones to protect special features such as historical areas and buildings (Bo-Kaap Heritage Protection Overlay Zone), wetlands and waterfronts.
- iv) Overlay zones can also be used to promote specific development projects, such as mixed-used developments, waterfront developments, housing along transit corridors, or affordable housing.

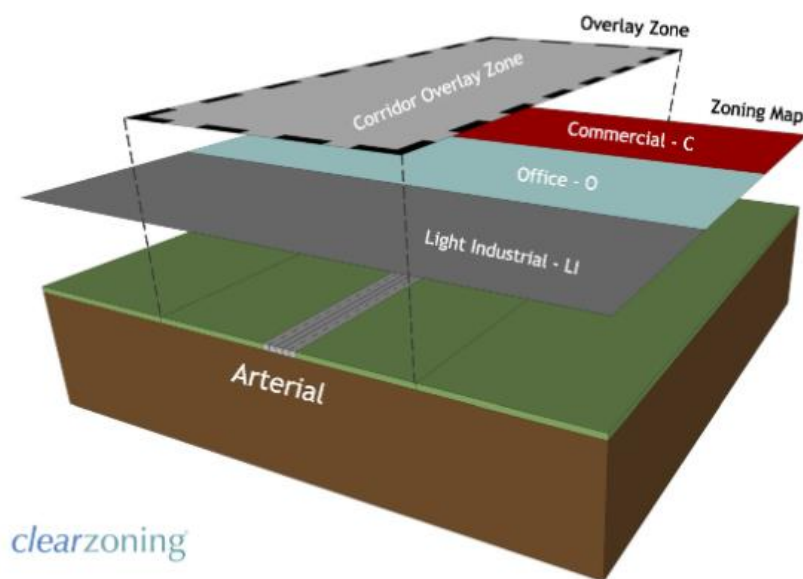


Figure 26 Applying an Overlay Zone

b) Costs or Risks

Overlay zones can create inefficiencies and inequities by applying regulations and restrictions to some properties and not others. Moreover, additional regulations may increase time and expense both for developers and for the City department(s) involved in the development approval process.

Overlay zones are excellent tools for where the base zones are compatible with the desired future. However, where the base zones are not compatible with the future vision, it might be necessary to modify the zoning of the properties.

c) Preconditions (When to use it)

Effective in boom periods during areas of growth pressure.

Effective when trying to reach a specific goal i.e. protect sensitive environmental / heritage area. Effective when trying to reach higher densities in certain urban areas and when the City want to incentivize development.

d) Timing

Overlay Zones are implemented to address a specific problem or to incentivize development within a specific area. The timing should therefore be done beforehand to ensure that it protects / address the problem it envisaged to protect or to guide the development it aimed to achieve. Once it is implemented it will stay in place for perpetuity.

e) Approval and Application process (where relevant)

Overlay zones should be used responsibly to avoid unnecessary confusion and administrative complications. Before applying an overlay zone, Council must follow procedures laid down in zoning scheme, which includes consultation with community and property owners.

S 148 in the CCT MPBL indicate the following as it relates to the approval / application of Overlay Zones"

(1) Preparation of an overlay zoning shall take into consideration the following requirements where applicable:

(a) the development principles contained in the SPLUMA, the LUPA and the CCT Municipal By-Law;

[Para. (a) substituted by s. 55 of City of Cape Town: Municipal Planning Amendment By-Law, 2016]

(b) the City's planning vision and principles as set out in its Integrated Development Plan;

(c) desired spatial form, including but not limited to the development of public and private land, infrastructure investment, utilisation of space, spatial reconstruction, location and nature of development, urban edge, scenic routes, green infrastructure corridors, areas of strategic intervention, mitigation of development impacts;

(d) the principles as set out in an approved spatial development framework or a policy plan;

(e) environmental and heritage protection and conservation; and

(f) the principles of co-operative governance and the duties and objectives of local government as set out in the Municipal Systems Act and the Constitution of the Republic of South Africa, 1996.

(2) An overlay zoning must not detract from the City's ability to serve the needs of the municipal area as a whole.

S 152: Process to designate a land unit, area or the city to have an overlay zoning

(1) The City may, after following a notice procedure contemplated in section 81 of this By-Law and after considering the objections, comments or representations received, designate a land unit, area or the City to have a specified overlay zoning.

(2) Prior to designating a land unit, area or the city, the City must have regard to any approved policy plan dealing with the specified overlay zoning.

i) Approval

S81 Development rules

The following development rules apply:

(a) The City may require a site development plan for a primary use, and shall require a site development plan for a consent use application.

(b) The site development plan as approved by the City shall constitute the development rules for a primary use if applicable, and a consent use.

(c) The provisions for a site development plan in item 123 shall apply.

ii) Application

Overlay zones should be used responsibly to avoid unnecessary confusion and administrative complications. Before applying an overlay zone, Council must follow procedures laid down in zoning scheme, which includes consultation with community and property owners.

- Council may apply the general provisions stipulated in a density overlay (DO) zone and subdivisional overlay zone (SAO) in terms of the Cape Town zoning scheme regulations.
- Subdivisional area overlay zone (SAO) confirms the principle of development and acceptance of future subdivision of land, but not detailed layout, which will be determined when an actual application for subdivision is approved.

•

The City Council (after following required public participation with IAPS) have the power to create an overlay zone. There are three basic steps to creating an overlay zone:

Define the purpose of the area / zone. The area should have a clearly defined purpose e.g. to protect drinking water, preserve historical character / heritage, densification, affordable housing, etc.

Identify the areas that make up the zone. Mapping boundaries will depend on the natural or cultural resources and the geographic areas that relate to achieving the purpose of the zone. For example, if the purpose of the zone is to protect the heritage of a certain area (Bo-Kaap), a detailed analysis would have to be done about edge delineation / what should be included and excluded.

Develop specific rules / guidelines that apply to the identified area. In a groundwater recharge district for example, provisions may restrict development or require development guidelines that capture and filter water runoff.

f) Advantages and Disadvantages

Advantages	Disadvantages
• Allows existing zoning regulations to be superseded or complemented to solve a known problem. • Can implement comprehensive plan policies and strategies associated with future land use and the environment. • Relatively easy to maintain over time following initial adoption.	• Does not create a direct revenue source for a municipality • Does not help pay for a municipality's infrastructure needs • Not useful in weak markets where developable land is abundant and there is low demand for dense development, i.e. where developers can easily develop market-rate housing at lower densities and gain a decent profit, and they do not need additional density as an incentive.

g) Targeted Areas

Development Focus Areas:

- At this scale of planning the spatial designation of the Urban Inner Core should be refined to areas of 'development focus' or priority, i.e. Development Focus Areas for the period of the DSDF (10 year cycle).
- Targeted areas for urban restructuring that have the highest potential spatial transformative impact (*i.e. addressing issues of spatial fragmentation, inefficient urban form and segregation by integrating communities and increasing opportunities to a greater number of people in highly connected areas*)
- **Areas linked to projects with a multi-sectoral focus** where there is funding available (be it operational and/or capital), or funding to be applied for, **for planning that will give rise to implementation (i.e. LASDFs, Precinct Plans etc.)**. (Planning work should at least commence within the lifespan of the DSDF)
- Priority Areas of Opportunity as **identified in CLDP and Integration Zones** that would serve as catalysts to unlock the potential for integrated development with cross-cutting benefits e.g. Bellville PTI, Philippi East.
- Areas with highest levels of accessibility (*i.e. within nodes and along development corridors.*)
- Potential to attract private sector investment

Scheduled Public Transport Accessibility Overlay Zone

Focus Area:

- **Low intensity area:** land units that are adjacent to or in close proximity of identified activity routes or streets and structuring routes as designated on the SPTA map (i.e. it does not have to be along an activity route or street or structuring route).
- **Additional use rights for low intensity areas:**
Land units with a zoning of Single Residential 1 and 2 -
 - office, guest house, place of instruction and service trade; andLand units with a zoning of Single Residential 1 -
 - house shop.
- **High intensity area:** land units that are adjacent or in close proximity to identified activity routes or streets and structuring routes as designated on the SPTA map.
- **Additional use rights for high intensity areas:**
Land units with a zoning of Single Residential 1 and 2 -
 - office, guest house, restaurant, service trade and place of instruction; andLand units with a zoning of Single Residential 1 -
 - business premises.

Project Type:

- Regulatory tool to facilitate small and micro enterprise development within designated scheduled public transport accessible routes.

Goal:

- As part of the City's Development Management Scheme (DMS), the SPTA overlay zone enables the initiation of processes to designate properties / areas along identified routes to be managed under this overlay. This is aimed at implementing the City's strategy goals around creating an enabling economic environment, especially for small and micro-enterprises. Under this overlay zone, property owners in identified areas seeking to start a formal small business, or formalise an informal business, will now have specified business uses as a primary right and need not to go through a rezoning or consent use application process.
- The purpose of the SPTAO is to make provision for the development of small and micro enterprises within the SR1 and SR2 zonings in city blocks along selected activity routes / streets and structuring routes approved by the City.
- Furthermore, the aim is to provide land use rights on behalf of property owners in an area where the likelihood and potential for individual owners to do so was low, but where the opportunity for business growth was high.
- The SPTAO provides rights to SMME that operate in the informal economy as illegal businesses to enable them to regularise the business to being legal

a) How it works:

SPTAO is an appropriate planning tool to promote the establishment of small business enterprises in residential areas with the purpose of encouraging economic activity at the local scale.

Enable small scale intensification of land uses in an incremental manner along an activity route, a development route or a structuring route.

The overlay will recognise existing small enterprises in these areas

The SPTAO will remove barriers / reduce the regulatory burden on the City.

Enable property owners to capitalise on their locational advantages to establish as of right small scale business enterprises that are broadly compatible with residential neighbourhoods.

The SPTAO make provision for the development of small and micro enterprises within the Single Residential Zones 1 & 2.

i) Criteria for designation of areas:

The provisions of the MPB-L 158D (1) to (4) reflect the basis for the designation of areas to be managed under the SPTA Overlay Zone (e.g. properties adjacent to activity routes, activity streets or structuring routes).

b) Qualifying Criteria

High intensity residential land units and low intensity residential land units (i.e. Single Residential 1 and 2 zoned properties) as depicted on the scheduled public transport accessibility map and as designated to have this overlay zoning are subject to items 158C, 158D and 158DA within the MPB-L.

c) Costs or Risks

Changing the land use rights of a property may have financial implications for property owners- both in terms of the rates they are charged and the valuation of their property (and by implication, the potential resale value of their property).

Practical challenge is to obtain power of attorneys from the property owners to act on their behalf. Title deeds in townships often do not reflect the correct property owner. Many residents in townships received government-sponsored houses that legally cannot be sold for the first 7 years. Informal transfers are common, resulting in a category of property owners that do not have formal title. Even in cases where government-sponsored houses have not been sold on, complications arise where multiple family members inherit a property.

d) Preconditions (When to use it)

Land unit is in area identified on the scheduled public transport accessibility route map: The identification of areas which are either high intensity or low intensity must comply with the general provisions of the Overlay Zone as provided for in terms of item 158C, 158D and 158DA) of the DMS in terms of their location in relation to the routes designated in terms of the scheduled public transport accessibility map. The City's

municipal services departments must certify that capacity is available on the services network in the specific area, for the additional primary uses.

e) Timing

The activation of this overlay zone is subject to the approval of the SPTAO map.

f) Approval and Application process (where relevant)

i) Approval

The SPTAO is subject to the City's approval of a scheduled public transport accessibility map which indicates high and low intensity residential land units.

ii) Application

Overlay zones should be used responsibly to avoid unnecessary confusion and administrative complications. Before applying an overlay zone, Council must follow procedures laid down in zoning scheme, which includes consultation with community and property owners.

To guide implementation of the overlay zone, it is proposed that the following standard process be supported, which aligns to the requirements of the MPBL:

a) Utility departments are engaged and requested to provide comment on the capacity of the local utility networks and the potential impact on services as part of the public consultation process. The extent of the overlay zone is amended if required.

b) The Mayor / Mayco member / or Delegated authority is briefed on the proposed areas for designation. The Delegated Authority provides support for initiation of designation for areas indicated.

c) Department finalises documentation for advertising the intended SPTAO designation to affected property owners / communities liaising with the Public Participation Unit as required.

d) Once draft proposals are complete, formal public consultation occurs (e.g. by means of advertising in the media, registered mail to IA&Ps and public consultation meeting), including a report to the relevant Sub-councils.

e) Upon completion of the consultation period, the final report dealing with the public comments is submitted to the relevant portfolio committee for recommendation to the Executive Mayor and the Mayco, recommendation is submitted to Council for a decision.

f) Once adopted by Council, the areas designated to be managed under the SPTAO would be published in the Provincial Gazette and placed on the City's website in line with s24(4) of the MPBL.

g) Advantages and Disadvantages

Advantages	Disadvantages
• Allows existing zoning regulations to be superseded or complemented to solve a known problem. • Can implement comprehensive plan policies and strategies associated with future land use and the environment. • Relatively easy to maintain over time following initial adoption.	• Overlay zoning often requires a higher level of technical expertise to administer. • Adds an additional layer of requirements to the development review process. • Requires a zoning amendment, which requires formal action by the CCT.

h) Case Study: Lessons Learnt

The Eveline Street (Windhoek, Namibia) case study provides some land use management lessons for South Africa, for streets that are already transport corridors/high streets:

1. Ensure secure business and land rights, so micro-entrepreneurs will not face repercussions if they invest in business infrastructure or growth
2. Rezone residential township properties in business corridors, to create mixed-use or commercial areas that accommodate multiple uses of land and a mix of businesses
3. Use licensing regulations as a tool to manage land use and encourage private investment.
4. Modify the existing urban infrastructure, to support development, e.g. wide pavements (for off-street parking and economic activities), varying plot sizes, street lighting, and space for expansions and alterations.
5. Develop an efficient, accessible and flexible public transport system that can support growth, facilitate economic inclusion and connect nodal points of activity.

i) Targeted Areas

- Along structuring routes within neighbourhoods, activity streets or development routes
- Experience high levels of pedestrian foot traffic, particularly those close to public transport services.
- Latent economic activity or pressure for business uses.
- Access to the property is not likely to have significant impacts on the mobility and accessibility network.
- Alignment to areas targeted for greater diversity (mix) of uses in support of the TOD Strategic Framework.
- Areas that are designated in the SPTAO are already serviced and impact on municipal services capacity is considered manageable.
- Potential negative impact on surrounding land uses is avoidable or manageable.

Inclusionary Housing Policy

Focus Area:

- Low-income areas within urban inner core
- Areas well located to employment opportunities.
- Areas located in proximity to PT facilities.

Project Type:

- Private property
- New developments
- Potentially redevelopments/conversions
- Rental
- Ownership
- Multifamily
- Single-family
- Market-rate

Goal:

- Encourage affordable housing development in areas where the local government has identified a shortage of housing affordable to low- and moderate-income households

a) How it works:

- i) There are two suggested options for the affordable housing contribution namely:
- ii) **On-site** (affordable units developed as part of the market development)
- OR
- iii) **Fees in lieu** will apply (monetary contribution which will be ring-fenced into a municipal fund for the development of affordable housing).
- iv) It is likely that the City will prescribe the choice between on-site and fees in lieu based on the scale of affordable housing contribution or the location of the development. If the development is of a certain scale and location then on-site will be mandatory; however, fees in lieu will apply if the affordable housing contribution is below a certain scale, or in undesirable locations.
- v) Potential incentives available to developers may include, amongst others:
 - 1) Density bonus (proactively embedded in overlay zone, and granted through normal processes outside of the overlay zone)
 - 2) Reduced parking requirements
 - 3) Changes to use restrictions and regulations governing the building envelop or building form.
 - 4) Fast-tracking approvals process

- 5) Reduction in development charges for the affordable housing portion of the development
- vi) This policy will likely use a standard definition of affordability across the City amounting to a monthly household income of R22 000 and below. Possible that sub-categories of household incomes below R22 000 will be targeted in this policy to ensure a spread of income groups benefit from this policy.
- vii) It is likely that on-site affordable housing generated by this policy will target higher income of around R15 000 – R22 000 monthly household income, whereas fees in lieu can be used to provide affordable housing for lower income earners.

b) Costs or Risks

- i) Administrative costs in ensuring compliance with policy and potentially managing rental stock.
- ii) Adverse market risk if property sector isn't able to factor the economics of building such stock.
- iii) A combination of different sets of legislation (Housing Act/MATR) may be necessary for the release of City-owned land.0020
- iv) Potential restrictions on sales of inclusionary housing.

c) Preconditions (When to use it)

- i) An Inclusionary Housing Overlay Zone (IHOZ) will be created. This overlay zone will align to:
 - (1) Areas of the City with strong property markets (where there is existing value)
 - (2) Strategically important transit-oriented development nodes, where density is desired
 - (3) In areas with appropriate public education, health, social facilities, and near employment opportunities
- ii) Within the IHOZ, development rights will be up-zoned above the existing rights, to a set threshold. If developments use the additional rights within the overlay zone, a proportion of those rights (still to be determined) will be reserved for affordable housing.
- iii) In the rest of the City, an inclusionary housing requirement will be triggered when new rights are granted over a certain threshold (still to be determined).
- iv) Strong urban land market:
 - (1) % change residential property value, 2012-2018
 - (2) High property values per m2, 2018
 - (3) High residential rental returns, 2018
- v) However, this will be reviewed following COVID-19

d) Timing

- i) During development in the case that on-site units are provided.
- ii) Fees allocated to ring-fenced fund will require additional planning and consolidation.

e) Approval and Application process (where relevant)

i) Approval

Policy yet to be approved. Currently in various phases of research and market analysis. Will be a long process due to its complexity and the fact that various role players will be involved. The Inclusionary Housing Policy will have to go through extensive public participation and it may take a considerable time for the developer and the public sector to reach an agreement. This policy is anticipated to go for approval at the same time as the DSDFs.

ii) Application

Voluntary: Incentives are used however, then developer must do affordable contribution.

Involuntary: Applies City-wide, but different implementation triggers:

- Overlay Zone: pro-actively up-zone development rights to a set threshold above existing zoning scheme - if developer uses additional rights then a proportion is reserved for affordable housing
- Rest of the City: I.H. triggered when new rights are granted over a certain threshold

f) Advantages and Disadvantages

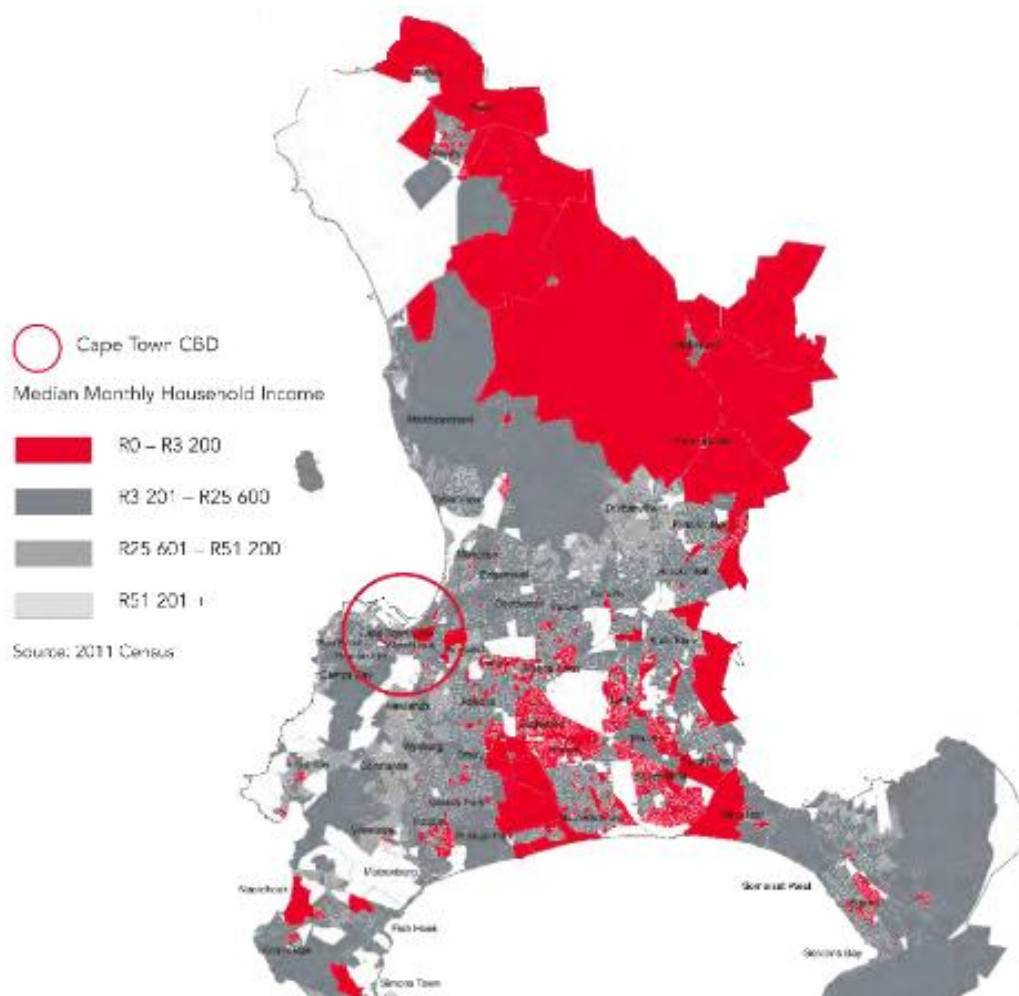
Advantages	Disadvantages
• Does not require capital investment by the City. • Is a step towards addressing housing backlog • Enables spatial justice in land use decision-making • Increases supply in affordable housing • Inclusionary housing can contribute towards the City's density objectives	• Is not a revenue generating mechanism • Does not help pay for a municipality's infrastructure needs • Not useful in weak markets where developable land is abundant and there is low demand for dense development, i.e. where developers can easily develop market-rate housing at lower densities • Private developers may reject parts of the proposed policy. • Private developers not willing to participate because the portion of inclusionary housing units/fees in lieu may be deemed to high and therefore

	the developer does not consider it worthwhile. • Uncertainty allocation of units and the portion of housing units allocated to the affordable income group. • Policy uncertainty / red tape driving away investment.

g) Targeted Areas:

IHOZ yet to be developed, but **potential** spaces include:

- Urban Inner Core and Consolidation areas.
- Structuring zones
- Public transport accessibility
- Areas with access to employment opportunities, social amenities



Proactive Rezoning/Upzoning

Focus Area:

- Urban centres
- Areas considered to have high growth potential and that are targeted over the medium to long term as new development areas.

Project Type:

- Depending on the end goal, but usually applicable to areas where the Municipality would want to incentivize development / densification
- Development corridors
- Mixed use Nodes
- Low density residential (SR1) areas which requires densification GR1

Goal:

- Increasing the development rights assigned to a specific property or properties.

a) How it works:

- i) Upzoning is defined as the process of increasing the development rights assigned to a specific property or properties, and proactive, as this is a state-initiated process, as opposed to a process initiated by a property owner.
- ii) Upzoning is the process where the rights assigned to a specific property are increased. For example, if a property zoned Single Residential, which only permits one dwelling unit, is rezoned to General Residential, allowing for many dwelling units on the property, the property has been upzoned.
- iii) Proactive refers to instances where the municipality, or another government entity, initiate the process, which is the reverse of the 'normal' process, which typically involves a landowner applying to the municipality for an increase in rights.

b) Costs or Risks

- i) Proactive rezoning can have a negative impact on the poor. For example, Freemark (2019a in Denoon-Stevens and Nel, 2020) notes that the mechanism can result in increased property values but can lead to no significant change in the amount of units being built. Which means that the upzoning raised property prices without increasing supply.
- ii) In the Langa (elaborated on in the detailed analysis for Small and Micro Enterprise Zones in this report) example it was found that properties valued under R200 000 were exempt from property tax, however, the proactive upzoning led to properties being pushed above that threshold to where they would have to start paying tax. Some property owners could not afford this and would prefer not to have been subject to the upzoning.

- iii) Upzoning can lead to relaxing zoning regulations in already gentrifying areas which in turn allows for development of housing for the wealthy but will likely affect the poor negatively because the older more affordable housing stock are being replaced by new housing that only the high income groups can afford.
- iv) Increased development rights, mean owners can charge higher rental which the poor can't afford or the owners can take advantage of increased development rights by either redeveloping the property or selling the property to a developer.

c) Preconditions (When to use it)

- i) Inclusionary housing and proactive upzoning often occur in conjunction with each other, with proactive upzoning providing some relief to the 'burden' faced by developers in building inclusionary housing.
- ii) Benefits to the poor from proactive upzoning can be an increase in the number of low to semi-skilled job opportunities, given the increased amount of activity in the construction sector (in successful proactive upzoning initiatives), higher local government revenues due to the rise in property values, and a more vibrant urban environment.
- iii) Sufficient bulk infrastructure availability is crucial for the success of upzoning.
- iv) The public sector needs to be aware of what is happening in the market and also should have good communication with the private sector so that both parties understand what is desirable to the market and what is not.

d) Timing

Proactive upzoning should be used in instances where it is possible to address the main structural reasons for an identified problem.

The right market conditions should be in place for upzoning to be successfully implemented, if it is unfavourable market conditions, developers / private sector are often reluctant to invest and make use the upzoning mechanism, meaning the process to have implemented could have been a fruitless exercise.

e) Approval and Application process (where relevant)

(i) Approval

At its simplest, proactive rezoning is the process where a municipality, of its own accord, changes the existing zoning of land parcels in its jurisdiction. Unlike overlay zones, which change certain rights for properties within a specific area and are strategic, changing the zoning regulations for the whole city affects all properties in the municipality and is comprehensive. A good example of this in CCT was where the zoning regulations were changed to allow lower parking requirements in PT1 and PT2 areas with good access to public transport. The most comprehensive form of proactive rezoning is where the municipality amends the existing land use rights (including densities and floor areas) or reduces development restrictions, such as building restrictions

f) Advantages and Disadvantages

Advantages	Disadvantages
• Upzoning is a powerful tool for creating incremental reforms to zoning schemes and maps, which can assist in ensuring that zoning rules continue to reflect both the norms and broader societal vision for a better urban form. • Can implement comprehensive plan policies and strategies associated with future land use and the environment. • Relatively easy to maintain over time following initial adoption. • Allows for urban regeneration and increases housing supply, which improves affordability and mobility for homeowners and renters. • Proactive upzoning, done correctly, and bundled with other interventions, can increase housing production	• Risk of not increasing housing supply through enhanced rights but increase in land value. • Adds an additional layer of requirements to the development review process. • Requires a zoning amendment, which requires formal action by the CCT. • Increased pressure on aging infrastructure and resources (roads, sewerage, water etc.) • Environmental concerns of increased density on carbon footprints and threatening important green space in urban settings.

g) Lessons Learnt

City of Cape Town

The CCT was created in the 1990s as an amalgamation of many smaller municipalities, as well as a large portion of an area previously under a divisional council. This resulted in 28 different zoning schemes applying to different parts of the municipality. To simplify the situation, these zoning schemes were incorporated into one single scheme in 2012. Consequently, several areas within the CCT experienced an increase in rights. For example, in the old planning regulations the GR zone had a maximum height of 8m and two storeys on properties with an erf size of 900m² or less and height of 11m and three storeys with an erf size of 1800m² or more. The new zoning scheme however most of these properties were zone GR2, which has a height restriction of 15m, however, some of the additional restrictions were included, a floor area restriction of 1 applies to GR2 but in the previous regulations there was no limit on floor area. The CCT also initiated an amendment to SR1 zone to permit a second dwelling on all properties zoned SR1, this was completed in 2015.

Eveline Street - Namibia

This case study focused on the illegal use of residential properties for business purposes, in particular those that sold liquor. This project aimed to formalise business rights for properties along a high street area and to encourage the opening of new businesses in this corridor. Interestingly, it was never formally completed due to objections from new councillors. Despite this, because residents were told that the rights were going to change, and because the municipality responded to this area as if the formal rights had changed, this (in part) sparked investment and development of the area.

This is an example of the spontaneous evolution of businesses, where the physical layout and anticipation of business rights came together. This was reflected through growth both in the number of businesses and growth of existing businesses, and an increase in the number of businesses applying for and being awarded business licenses (Tonkin et al., 2018).

Langa High Street Project

Langa is a suburb situated approximately 13 km east of the Cape Town CBD and is considered to be a deprived area where lower income groups reside. The CCT initiated an overlay zone to promote urban revitalisation known as the Langa Quarter project. In this area, 207 properties were placed under an overlay zone that permitted an increased floor area, and the rights for restaurants, offices, boarding houses (guest houses), or service trades. This was done both as an attempt to regularise existing 'illegal businesses', and to stimulate new business growth in the area

h) Targeted Areas

- i) TOD precincts, activity streets, Bellville PTI where demand exists, land opportunity. Eg Bellville PTI and surrounds.
- ii) Areas where there is an opportunity for densification, areas zoned for SR1 but where opportunity exists for additional dwellings etc.
- iii) Areas earmarked for future densification and classified as development focus areas, in other words, areas in the City where investment and growth should be geared towards.

Environmental Exclusion Areas

Focus Area:

- New Development Areas (NDAs)
- Structuring corridors

Project Type:

- All types and forms of residential and non-residential development.

Goal:

- The purpose of this mechanism is to provide for appropriate environmental exclusion of National Environmental Management Act (NEMA) listed activities from the requirement to obtain an Environmental Authorisation in New Development Areas (NDAs) identified by the Land Use Model and Revised District Spatial Development Framework.

a) How it works:

Applicant / Developer

The exclusion process for the applicant/developer works as follow: An applicant / developer identifies / takes interest in a site that has been identified through the Land Use Model (LUM) as a New Development Area. The LUM indicates what type of development (residential, non - residential etc.) is appropriate / desired on this specific site. If the site has been identified and accepted (by the authorities) as one where exclusion of specific NEMA listed activities from requiring environmental authorisation is possible, then the developer may:

- a) Check if his/her proposed project will trigger any listed activities in any of the Specific Environmental Management Acts (particularly the National Environment Management (NEM) Water Act, the NEM Waste Act, the Coastal Management Act and the NEM Air Quality Act) that will trigger the requirement for an environmental authorisation. If there are listed activities in these Acts requiring authorisation, the developer will need to proceed through the normal environmental authorisation applications (Basic Assessment or full Scoping Environmental Impact Assessment (EIA).
- b) If the only triggered activities are those listed in the NEMA Environmental Impact Assessment Regulations (2014, as amended) – and the site or area is identified as a geographic area where exclusions are possible in terms of the provisions of Section 24 (2) of NEMA, then the developer will not need to get authorisation for those specific NEMA listed activities. The developer will however have to abide by and implement the conditions set out in the standard or tool (usually in the form of an Environmental Management Programme Report (EMPr)¹² that has been developed for the exclusion area.

¹² Definition of EMPr: An Environmental Management Programme (EMPr) can be defined as “an environmental management tool used to ensure that undue or reasonably avoidable adverse impacts of the construction, operation and

These conditions include specific impact prevention and mitigation actions for that specific geographic area where exclusions for specific NEMA listed activities have been enabled.

- c) The developer will need to apply for registration of the exclusion and notify key interested & affected parties of the registration decision to enable them to appeal the registration decision.

b) Costs or Risks

- i) The Developer / applicant will carry no cost / risk since the activity that they previously had to apply for to get EA has been excluded. The cost / risk will be less since the exclusion process provides certainty about what is envisioned for a specific site and the developer will not have to spend time / resources to obtain EA for the listed activity.
- ii) The only real cost the CCT will carry is the time / resources that will be spent on obtaining approval for the specific exclusion areas and administering the relevant areas within the management and control of the CCT, to ensure that the guidelines as contained in the EMP are adhered to.
- iii) It is emphasised that these exclusions are applicable only to NEMA listed activities, and that should any activities trigger authorisation requirements due to being listed in any of the Specific Environmental Management Acts (Water, Waste, Air, Coast), then the relevant environmental authorisation application process (Basic Assessment or Full Scoping/EIA) would have to be followed.
- iv) Developers will also have to fulfil the requirements of any other applicable legislation, including those of the National Heritage Resources Act and any land use application processes.

c) Preconditions (When to use it)

- i) Exclusions can typically be provided for sites that have been degraded and transformed and where the listed activities that typically will be triggered are not of relevance anymore.
- ii) When the site is not deemed to be of environmental importance any more due to it being disturbed / transformed and not restorable.
- iii) Sites that are isolated from the wider Green Infrastructure network and that form part of the current urban fabric.
- iv) Where an urgent need is required for a specific type of development, be it residential or non-residential, and where the proposed activity will not have a detrimental impact on the environment.

decommissioning of a project are prevented; and that the positive benefits of the projects are enhanced" in all phases of the project's life cycle.

d) Approval and Application process to obtain exclusions (where relevant)

Process to obtain Environmental Exclusions for identified sites:

1. The first step is to identify the specific geographical areas where listed activities will be excluded. The focus areas for exclusions will be based on the outcomes of the Land Use Model and areas which have been earmarked as NDAs, Development Focus Areas and Urban Support Areas. The Spatial Planning and Environment Directorate will go through a process of identifying potential geographic areas where exclusions may be possible. The reasons for/motivation behind these potential exclusion areas will be documented and the sites will be mapped.
2. The next step is to clearly identify the NEMA listed activities that will be excluded in each of the identified exclusion areas. In addition, the relevant environmental impact prevention and mitigation actions necessary for these exemption areas will be developed and documented in an EMPr. The EMPr instrument specifies what conditions should be in place and what requirements should be adhered to in order for the exclusions to be granted to the specific site / area.
3. Once the applicable sites have been identified and the EMPr has been developed, these areas and the EMPr will need to be gazetted for public comment, by the the Minister or Member of Executive Council (with concurrence of the Minister).
4. Prior to the gazetting of the draft EMPr, it will be included in the SDF/EMF to inform the public of the intention to develop and adopt an exclusion instrument. After the public participation process, revisions may need to be made to the proposed exclusion areas, depending on the comments received. These revisions can be made at the same time that revisions are being made to the SDF/EMF after the first public comment.
5. The SDF/EMF, with the identified exclusion areas and activities will then be finalised. The SDF/EMF will then be made available to the competent authority (DEA&DP) for adoption as an Environmental Management Instrument.
6. Once the SDF/EMFs are adopted and the EMPr is gazetted and approved, developers may apply to formally register their project if they fall within the identified exclusion areas; the registration process is relatively quick, but the developer does need to notify interested and affected parties of the registration decision, as it is appealable.

e) Timing

- i. The process to identify environmental exclusion areas and activities needs to be completed by the start of the District SDF public participation process (2021). The proposed EMPr for these exclusion areas should also be drafted and subjected to the public comment process.

f) Advantages and Disadvantages

Advantages	Disadvantages
• Does not require utilizing any capital resources or debt to implement. • Results in exclusion from NEMA listed activities in specific geographic areas for the next 10 years. • NDA environmental exclusions will unlock development potential. • Encourages development where environmental features are of little value / disturbed and cannot be repaired / rehabilitated to return to natural state. • Advantages to applicant include: • Less time/ resources / application fees; • One less application be applied for in order to obtain EA; • Shorter timeframes to get feedback; and • Less red tape / approval processes.	• Exclusion approval may take a long time to get approved, particularly if the SDF/EMF has to be adopted as an Environmental Management Instrument by DEA&DP (i.e. competent authority) before the exclusion areas and activities can be registered. • The first SDF/EMF public comment period will identify the proposed exclusion areas and activities, but the actual process of getting these accepted and registered will be a second and ongoing phase. It is not known how long the registration process will take. • The developer will need to notify the public that a registration process is underway and provide them with opportunity to appeal the registration decision. An appeal process normally requires a 30 day delay before the proponent can start with the listed activities (i.e. to see if there are any appeals). • Still have to establish an agreed upon methodology of how the process will be managed. There are still some questions as to the public involvement and registration processes. • The Registration Application may get refused although this is unlikely if the SDF/EMF is adopted as an Environmental Management Instrument and enough supporting information is provided. • Sites with other sensitive environmental features such as waterbodies etc. still have to go through full authorisation process.

g) Case Study:

Gauteng Environmental Management Framework:

The framework identified specific exclusion zones, developers can then apply to undertake listed activities in the exclusion zone. The necessary description of the project must be given. In addition, the application has to be advertised and there is opportunity for the public to appeal the registration. If no appeal (or appeal is resolved in favour of developer), the project is then registered and the developer can commence with the listed activities. Notification of commencement must be given ahead of time. The registration validity has a time limit, in this case, 10 years. If the developer has not commenced with all the listed activities in this time, he/she must reapply for registration.

h) Example of where it can be applied:

Where the NDAs (sites within Development Focus Areas and within Structuring Corridors) and sites with environmental features overlap, but where the environmental features are not considered to be significant or where portions of the site can be developed through appropriate design and that would not have a detrimental effect on the environment.

Heritage Exemption Areas

Focus Area:

- Development Focus Areas (DFAs)
- Areas where the overall heritage value of the built environment is low
- Areas considered to have high growth potential and that are targeted over the medium to long term as new development areas.

Project Type:

- All forms of residential and non-residential development permitted.
- Depending on the end goal, but usually applicable to areas where the Municipality would want to incentivize development / densification and where anticipated impact on heritage significance is low
- Development corridors

Goal:

- Facilitate and encourage development where densification is appropriate and desirable
- To streamline the administrative process predevelopment.

a) How it works:

The NHRA makes provision for the exemptions of the requirements of S34 and S38 in geographical areas where heritage resources within that area 'are adequately provided for' in terms of the formal protections of the NHRA.

The exemption method can be more appropriately applied in the Development Focus Areas outside the HPOZ and proposed HPOZ and particularly along the development corridors (e.g. Voortrekker corridor): areas where the overall heritage value is low and the future growth potential is high.

Following a heritage audit of the area under investigation for exemption, the City can proactively apply to Heritage Western Cape for exemption. The main purpose of the heritage exemption is to encourage development and densification where it is desirable through the reduction in time and costs of administrative processes, as the development application will only require city approval. It further provides certainty by confirming the absence of conservation worthy heritage resources in the area and no application to HWC is required.

b) Qualifying criteria

A heritage audit of the geographical area to be exempt must be completed and conservation worthy heritage resources within that geographical area must be formally protected in terms of the NHRA.

c) Costs or Risks

- i) There will be a reduction in the costs associated with specialist heritage studies as the developer/applicant will not be required to make application to Heritage Western Cape in terms of S34 and/or S38
- ii) The City of Cape Town may need to invest additional time and resources to apply for the relevant exemptions.
- iii) Some risk associated with uncertainty regarding timeframes in which HWC may process the exemption application

d) Preconditions (When to use it)

- i) In areas where the built environment is older than 60 years but not considered to be have high conservation potential
- ii) Where an urgent need is required for a specific type of development, be it residential or non-residential, and where the proposed activity will not have a detrimental impact on heritage resources.

e) Timing

- i. The application for heritage exemptions is a medium to long term process
- ii. The concept of application for heritage exemption can be included in the SDF review process

f) Application and approval process (where relevant)

Application for exemption is made in terms of S34(3) and S38(9) of the NHRA by the local authority to Heritage Western Cape.

Section 34 (NHRA, pg. 58):

(1) No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.

(3) The provincial heritage resources authority may at its discretion, by notice in the Provincial Gazette, make an exemption from the requirements of subsection (1) within a defined geographical area, or for certain defined categories of site within a defined geographical area, provided that it is satisfied that heritage resources falling into the defined area or category have been identified and are adequately provided for in terms of the provisions of Part 1 of this Chapter.

Section 38 (NHRA, pg. 66):

(1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as—

- a) the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;*
- b) the construction of a bridge or similar structure exceeding 50 m in length;*
- c) any development or other activity which will change the character of a site—*
 - i. exceeding 5 000 m² in extent; or*
 - ii. involving three or more existing erven or subdivisions thereof; or*
 - iii. involving three or more erven or divisions thereof which have been consolidated within the past five years; or*
 - iv. the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;*
- d) the re-zoning of a site exceeding 10 000 m² in extent; or*
- e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.*

(9) The provincial heritage resources authority, with the approval of the MEC, may, by notice in the Provincial Gazette, exempt from the requirements of this section any place specified in the notice.

Approval of heritage exemption

1. Heritage audit of geographical areas identified as suitable for exemption.
2. Submission of the heritage audit results of the specified geographical area to HWC IGIC (Inventory Grading Interpretation Committee).
3. Once HWC IGIC has indicated support for the application, and satisfied that conservation worthy heritage resources within the geographical area has been adequately protected in terms of the formal protections of the NHRA, the proposal must go through a public participation process.
4. Following the outcome of the public participation, HWC council can approve S34 exemption by means of a notice in the Provincial Gazette.
5. In the case of S38 exemptions, HWC must place a notice in the Provincial Gazette, after the approval of the exemption by the MEC Arts & Culture.

g) Advantages and Disadvantages

Advantages	Disadvantages
• Does not require utilizing any capital resources or debt to implement • Encourages development where it is desirable in terms of little or no negative impact on heritage • Advantages to applicant include: • Less time/ resources / application fees; • 'One stop shop' for development application • Reduced timeframes • Certainty for developers	The application process to HWC is very time consuming

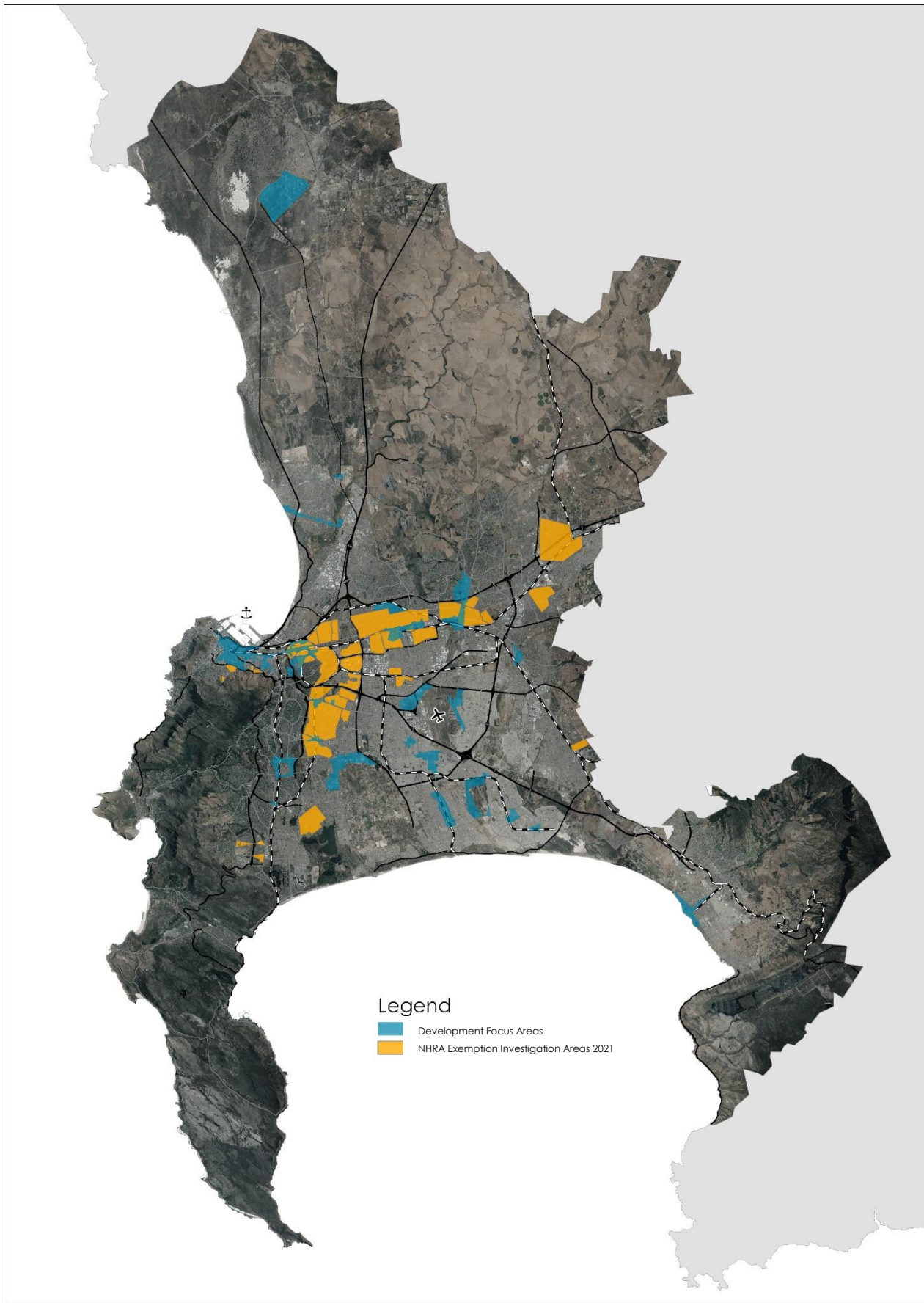
h) Case Study: Parow

Motivation

- Supports MSDF investment rationale → suite of incentives to encourage density and diversity around public transport.
- Promotes greater certainty for future development while conserving heritage-worthy sites.
- Built stock (older than 60 years triggering s34 of the NHRA) not of particular heritage value or significance.
- Encourage development in areas of little or no heritage significance by reducing administrative 'red tape'.
- Does not give or take away existing development rights nor does it suggest that development is imminent.

i) Example of where it can be applied:

- i) Development Focus Areas where there is coincidence with areas identified for investigation for heritage exemption



Tax Abatements

Focus Area:

- Areas where development is encouraged but the property market demand is weak.

Project Type:

- Residential, commercial and/or industrial development, depending on the type of economic development the municipality would like to encourage.

Goal:

- Stimulate private market-rate or below-market development (such as affordable housing).

a) How it works:

- i) A reduction or exemption from taxes granted by government for a specific period, usually to encourage investment in locations with lower demand (eg. UDZ in SA)
- ii) Benefits of the tax abatement get passed onto subsequent owners who purchase the property, thereby incentivising end users to relocate to an area that they may not otherwise locate in
- iii) Can be set up in designated neighbourhoods where the city is trying to incentivise development or on project-by-project basis if that project advances certain policy goals e.g. job creation.
- iv) Property tax pinning (whereby property tax is frozen or pinned down for a fixed period of time), differentiated property tax rates and remissions of rates could all be used to draw developers/home buyers into priority areas (Meyer and Oranje 2001).

b) Costs or Risks

- Direct negative fiscal impact in exchange for long-term economic & social benefit
- Requires administrative capacity
- While incentives can play role in encouraging investment that is critical for driving economic growth, the City must be cognisant of the revenue implications of these programmes and how it impacts administration's capacity to address its other strategic policy priorities.
- Tariff impact modelling exercise required.
- Poorly targeted incentive may result in significant loss of income for City.

c) Preconditions (When to use it)

- In a distressed market where residents & businesses have not been willing to make improvements to their property or to invest in the area
- In a stabilised market to incentivise the development for social good (eg. affordable housing)

d) Advantages and Disadvantages

Advantages	Disadvantages
• Help mitigate financial risk to developers by helping to close the gap in a market where the cost of construction exceeds anticipated sale price. • For residential developments, tax abatements can incentivise a homebuyer to purchase a home at a higher price knowing that the property taxes will be reduced or waived for a set period of time. • May attract economic activities which corresponding with high rate burdens, especially land extensive and electricity/water intensive activities. • May improve the chances of survival amongst existing small and medium enterprises. • Secondary economic and social benefits such as job creation, improving safety by eliminating blight conditions, and increasing adjacent property value.	• If the neighbourhood doesn't improve, property value could remain flat or even decline. • While striving to induce investment, tax abatements present a risk of becoming unnecessary giveaways or incentivising unsustainable development. For example, a receiving firm may be or become dependent on the incentive for profit or viability and may require a renewed abatement otherwise it may leave the community, risking a termination of the some or all beneficial gains. • Can cause significant loss of income to City. • May counter-act demand management imperative. Risk of incentivising unsustainable economic practices, such as land extensive activities or activities which consume very large quantities of water, electricity and generates significant waste.

12.8.2.2. Income Generation Mechanisms

Land Readjustment Scheme

Focus Area:

- Transit-Oriented Development
- In urban fringe areas along future railway lines

Project Type:

- Neighbourhood redevelopment to make way for new infrastructure

Goal:

- Acquire land to build public infrastructure using minimal municipal funds
- If there is surplus land as a result of a land readjustment, the municipality can sell the surplus land and use the proceeds to help defray costs of building the new infrastructure

a) How it works:

- i) Landowners pool their land together for reconfiguration and contribute a portion of their land for sale to raise funds to partially fund public infrastructure costs. This can be facilitated by local government through the development of a new land use plan for a particular precinct or local area, which will include new infrastructure provision, which increases the value of each surrounding plot. As this will like increase the value of properties, due to better planning and infrastructure provision, private landowners are willing to give up some of their land to fun said infrastructure.
- ii) Can be undertaken by either public or private entity
- iii) The municipality can designate special land readjustment areas along future public transport infrastructure, and provide services to facilitate landowners consolidate their land.

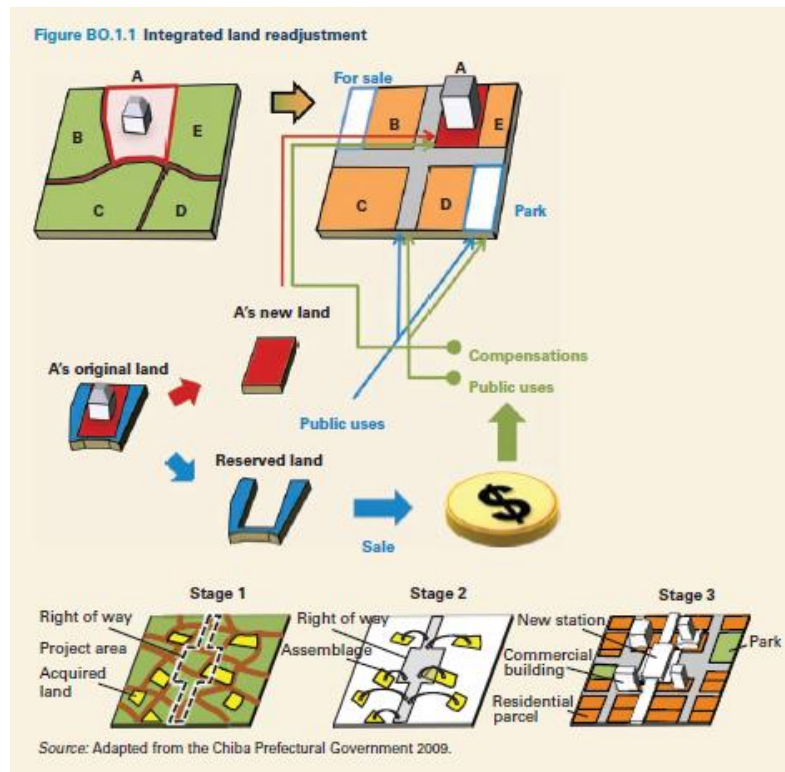


Figure 27: Land Readjustment Scheme (Worldbank, 2015)

b) Costs or Risks

- Compensation for taking land is in the form of another piece of serviced land of equal value, therefore no initial capital outlay for land acquisition by the local authority
- May require compensation to property owners not willing to participate

c) Preconditions (When to use it)

- For new infrastructure projects that require land assemblage
- In a market where the construction of improvements is expected to result in a significant increase in the value of surrounding property
- Willing property owners

d) Approval and Application process (where relevant)

There is no City policy that makes provision for such a mechanism. However, in theory, a typical process is described below:

- Initiation (usually by petition from a majority of property-owners in a particular area to the local authority). Dissenting landowners may be forced to contribute their land to the project through some form of regroupment by order.
- Declaration of the boundary limits of the scheme, normally by a public agency under enabling legislation, or by a private association of landowners. An association of land-owners can be formed, with rules of association, directors and meeting procedures.

- Preparation of a redevelopment scheme by the municipality or related entity determining future uses and re-planning the road and plot layout. This can identify buildings for demolition or reconstruction, street closures, proposed public areas, as well as the land allocated for private development.
- Measurement of plot areas before and after readjustment.
- Costing. This will value the market price of all saleable plots, and estimated development costs of infrastructure.
- Reallocation of plots back to landowners, with secondary rights (tenant, mortgagors) protected. Typically, half of the original land area will be retained for roads and public spaces, and for cost equalisation, leaving half to be reallocated, usually located as nearly as possible to the originally position. Need for guarantee that land values will not decrease, and no risk to land-owner. Land owners should be given the right to leave the project, with value recovery guaranteed by the municipality. Landowners will be allocated plots that are 60% of the area of the land that they originally contributed to the project in plots. Owners may opt for payment rather than land. However, the land received back will be fully serviced and ready for sale as urban lots.
- Implementation. The "reserve" or "cost-equivalent" land is sold by the agency as the project proceeds, and the proceeds from their sales should cover the infrastructure costs. The sale of these plots is generally by advertisement and public auction. If serviced development land is worth 400% of the value of un-serviced land, the 60% of plot area returned to landowners will still be worth 240% more than the plot originally contributed (exempt from land transfer tax).

[Robert, 2007]

e) Advantages and Disadvantages

Advantages	Disadvantages
• Requires minimal public funds to acquire land compulsory for public purposes. • In a carefully planned land readjustment project, local infrastructure investments could, in theory, be self-financing. • Land readjustments promote transit oriented development and potentially increased density and mix of uses to create sustainable development.	• The negotiation process between the agency and property owners on land allocation issues can be lengthy and contentious. • Property owners must be convinced of the benefits of giving up their land in exchange for a smaller parcel with a higher value. • To construct public improvements, municipal capital resources or debt would be required upfront. • Revenue from the sale of excess property would not cover any

• The addition of public infrastructure increases property value and increases property tax revenue. • Unlike using eminent domain, this tool allows original owners to partake in land redevelopment, thus enabling them to enjoy the financial gains generated by the project.	operating deficits for the infrastructure improvements. • Not applicable in built-up areas where land is scarce to make way for new infrastructure.

f) Targeted Areas

Future TAPs (Transit Accessible Precincts): areas within a 500 metre walking planned rail, BRT stations and certain higher order stops– see Figure 28 below.



Figure 28: TAPs

References:

Home, Robert. (2007). Land readjustment as a method of development land assembly: A comparative overview. *Town Planning Review*. 78. 459-483. 10.3828/tpr.78.4.4.

Suzuki, Hiroaki; Murakami, Jin; Hong, Yu-Hung; Tamayose, Beth. 2015. Financing Transit-Oriented Development with Land Values: Adapting Land Value Capture in Developing Countries. *Urban Development*. Washington, DC: World Bank. © World Bank. <https://openknowledge.worldbank.org/handle/10986/21286> License: CC BY 3.0 IGO.

Urban Redevelopment Scheme

Focus Area:

- Transit Oriented Development
- Around an existing rail or BRT station or a new station that is planned to be built

Project Type:

- Multiple private owners consolidate parcels into a single high-density building

Goal:

- Dense urban regeneration
- If there is surplus floor area left after property rights of original landholders and building owners are moved to the new building, the municipality can sell the development rights and the proceeds to pay for infrastructure improvements.

a) How it works:

- i) Involves landowners and developer joining together to form one cooperative entity that consolidates multiple land parcels into a single site for redevelopment. As part of this process government assembles the individual private properties and undertakes a new higher development plan and delivers the necessary infrastructure.
- ii) Government proactively rezoned the composite site from residential to mixed-use, and plans denser development using the assembled land parcels.
- iii) At the end, the government returns to each landowner a share of the overall new development that is equivalent to their original land or property ownership. It retains a share of the development that it then sells to recover the cost of the infrastructure improvement.

Figure 4.2 Inclusive urban redevelopment scheme, Japan (hypothetical)

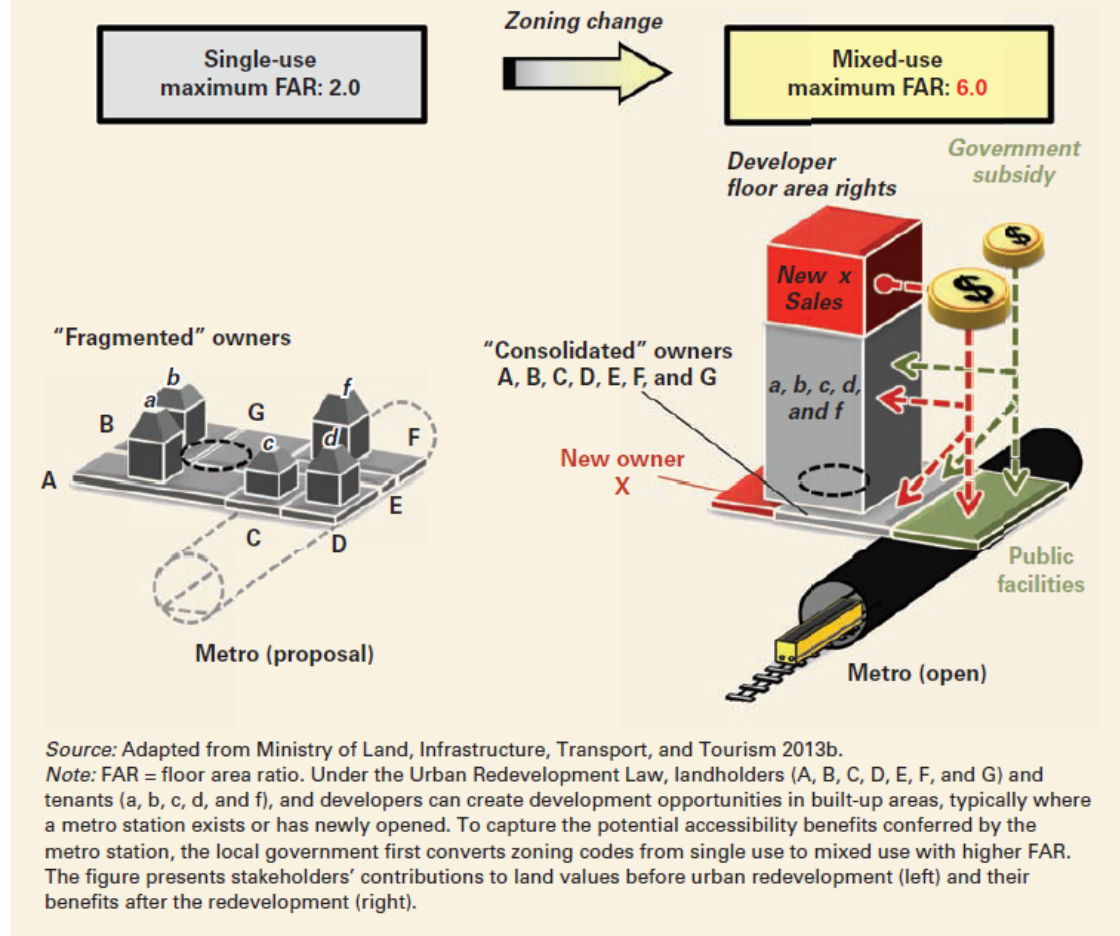


Figure 29: Urban Redevelopment Scheme (Worldbank, 2015)

b) Costs or Risks

Would require provision of new public infrastructure. The sale of surplus floor area could be used to pay for infrastructure costs.

c) Preconditions (When to use it)

- i) In a targeted redevelopment district where market demand for high density development is strong but developable land is scarce.

d) Approval and Application process (where relevant)

- i) Approval

There is no City policy that makes provision for such a mechanism. However, this can form part of a proactive rezoning for targeted areas or an incentive overlay zone, which is provided for the City's Municipal Planning By-Law.

- ii) Application Process

Refer to the Proactive Rezoning and Overlay Zone mechanisms for a description.

e) Advantages and Disadvantages

Advantages	Disadvantages
• Promotes dense, transit-oriented development. • Potentially results in surplus floor area that a municipality can sell the development rights and use the proceeds to substantially cover the costs of land assembly, new buildings, and public facilities within the district. • Results in increased property taxes as a result of improved properties. • Promotes economic development by creating high-density buildings and potentially a mix of uses. This can lead to additional tax revenue, the creation of jobs and housing, and increase ridership of public transport. • Transit oriented developments help reduce the reliance on automobiles as the primary mode of transportation while promoting a more efficient land use and public infrastructure.	• Likely requires the provision of new public infrastructure (e.g. Wider roads, a station plaza, and other amenities to support dense, mixed use urban development). Public resources would be necessary to finance and build the infrastructure. • Not applicable where is no transit station built or planned, and dense development is not in demand (i.e. developable land is abundant so there is no need to consolidate small parcels).

f) Targeted Areas

TAPs (Transit Accessible Precincts): areas within a 500 metre walking distance of current and planned rail, BRT stations and certain higher order stops.

12.8.2.3. Institutional Mechanisms

Land Release and Acquisition Strategy

Focus Area:

- Metro-wide land parcels
- City-owned land
- Urban centres and land with TOD Potential

Project Type:

- For private or city-owned property being transferred for private development
- Private-owned land parcels being transferred to the City
- Inter-governmental land transfers

Goal:

- Strategically plan for the City's developmental needs by creating a consolidated inventory of future City land acquisitions and alienations.
- Align the land requirements of City line departments to existing inventory of City-owned land.
- Ensure the sustainable use of land resources to meet expected future population demands.
- Leverage strategically well-located land to attract private sector investment.

a) How it works:

- i) The Property Management Department is currently in the process of drafting a Land Release and Acquisitions Strategy which will lay out the City's strategic process for deciding up on which land parcels should be acquired or alienated.
- ii) The forthcoming strategy will not change the processes by which acquisitions/releases take place in accordance with the Municipal Asset Transfer Regulations Policy. As such, the land disposition and land acquisition mechanisms, outlined in this suite of mechanisms will apply as per normal.
- iii) The strategy should seek to ensure that the needs of line departments can be catered for by land that is currently held by the City or that a strategic approach to identifying land for acquisition is utilised to secure the most appropriate land for the line-department requirements or developmental need.
- iv) The identification of land to be earmarked for use within the strategy should be an informed, data-driven process, as such a number of tools have been put forward in the form the Land Identification Protocol (currently being drafted) to be used by Property Management (Figure 30).
- v) The Land Release and Acquisition Strategy should benefit from the inclusion of a database of strategic land which will be developed using SP&E policy

- and investment frameworks, a spatial filtering tool and a database of Undeveloped and Partially Developed Land Inventory (red box in Figure 30).
- vi) Ideally, land parcels that are subject to being entered in this Strategy go through the requisite stages of the CCT Land Pipelining Process (Figure 31) as a means of ensuring that the appropriate checks are made with regard to their identification and the suitability of the land (i.e. due diligence).

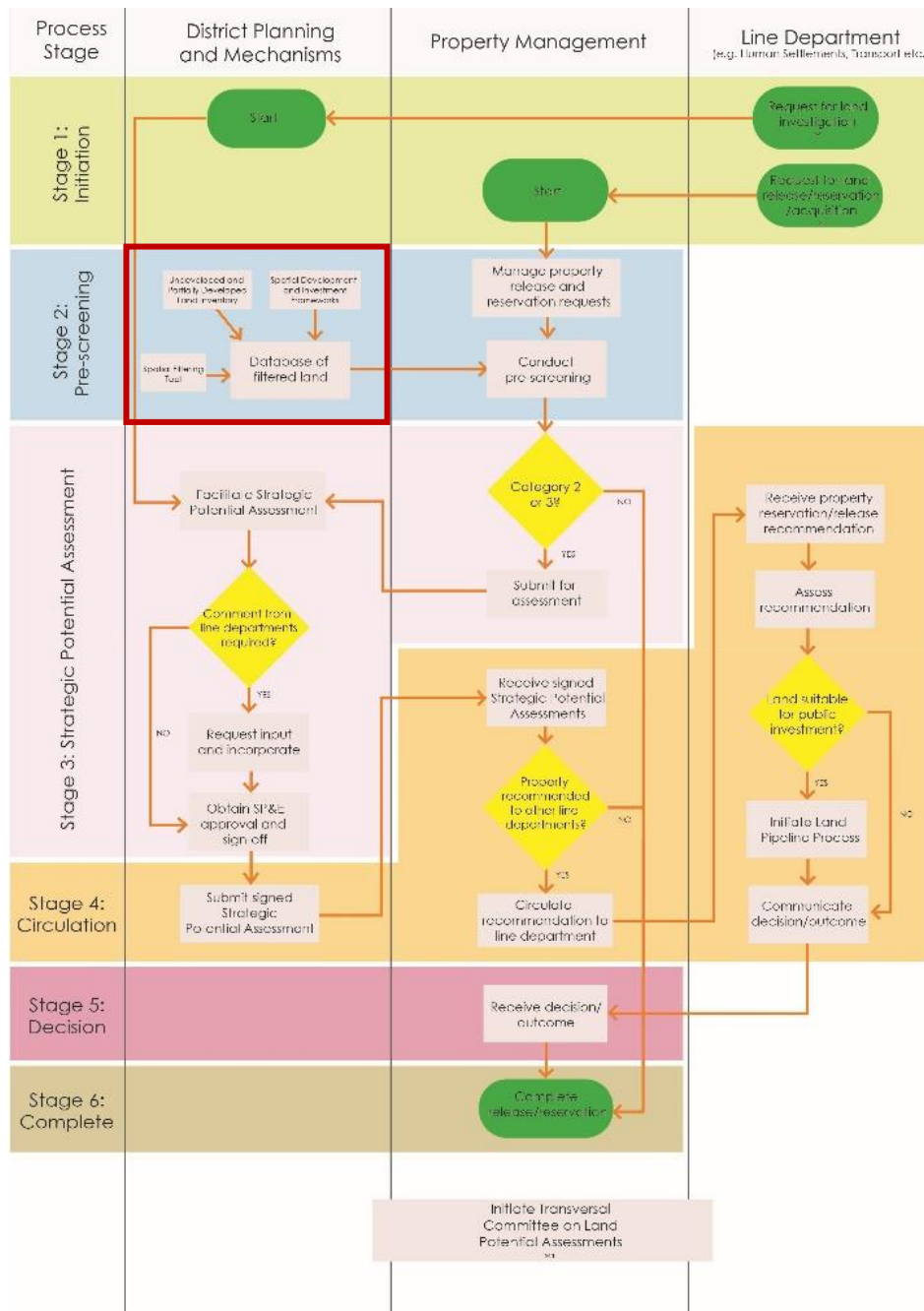


Figure 30: Land Identification Protocol Process Diagram

CITY OF CAPE TOWN LAND PIPELINE FOR PUBLIC INVESTMENT

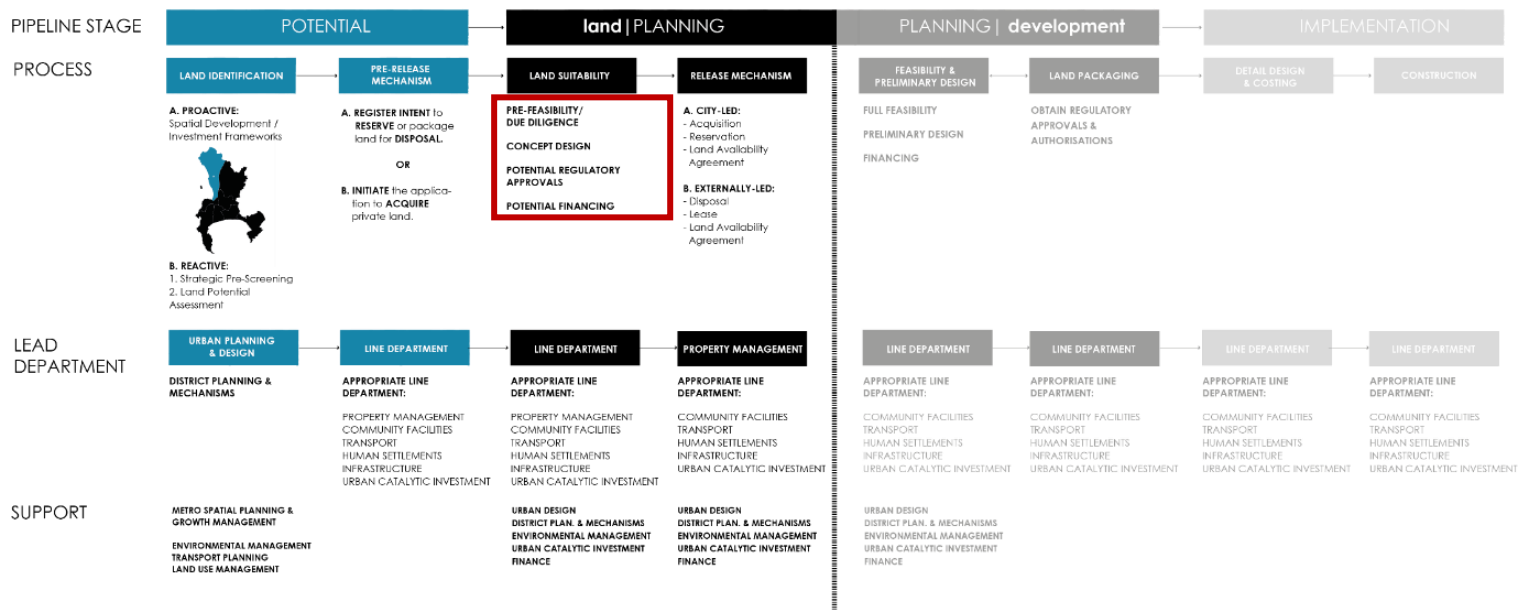


Figure 31: CoCT land pipeline for public investment

b) Costs or Risks

- Administrative costs to the municipality.
- If land is released without the proper checks in place to ensure that it is non-strategic, this could be a wasted opportunity cost to the City to use it for developmental purposes.
- Holding and safeguarding costs of land may be incurred in the event that the strategy does not align with Capex budget for other developmental departments.

c) Preconditions (When to use it)

- Land which is tabled in the Strategy for acquisition should ideally be considered to have the potential for strategic development. This would mean that the land parcels have elements of social opportunities, natural infrastructure, economic opportunities, housing, and transport and urban infrastructure to contribute to the facilitation of the City's spatial planning policy, TOD objectives and building integrated communities
- Land that does not fall within these parameters should be considered for alienation by the City.
- The leasing of land should also be considered for those parcels which are deemed strategic but do not fall within investment frameworks of City line departments.

d) Timing

- i) Will be continuously running once it is finalised. The strategy will present a framework for 3/5 year periods of land acquisitions and releases by the City.

e) Approval and Application process (where relevant)

i) Approval

The Land Acquisitions and Disposals Strategy is currently being drafted by the Property Management Department. It is expected that this will be completed and passed through PCC by the time that the District Plans are approved or shortly afterwards.

ii) Application

Application follows standard MATR processes which will be administered and approved by the Property Management Department with input from Spatial Planning as well as other relevant line departments.

f) Advantages and Disadvantages

Advantages	Disadvantages
• Does not require utilizing any capital resources or debt to implement • Can be used to achieve developmental vision of the City. • Presents a clear strategy framework for the City's approach to utilising land which may entice developers to invest in certain areas.	• May lead to the release/acquisition of land which is not entirely suitable to the developmental aims of the City.

g) Case Study: Lessons Learnt



*The Rondebosch Golf Club occupies about 45 full-size soccer fields, which activists said could be used to build 2 500 new homes.
Picture: African News Agency (ANA)*

Build homes at Mowbray golf club, City told as land occupations spike

By Francesca Villette 🕒 Aug 19, 2020



Cape Town – With more prime City-owned land up for lease renewal to a golf club, housing activists have said the Mowbray site should be considered for affordable housing, the need for which has been exacerbated by the Covid-19 pandemic.

The City was considering an application to renew the King David Mowbray Golf Club's lease for another 10 years, with a rental of R11 500 a year, or R950 per month, according to advocacy group Ndifuna Ukwazi (NU).

NEWSFLASH

Landmark Tafelberg ruling: Western Cape High Court strikes a blow against apartheid spatial planning

By Suné Payne • 31 August 2020



Protests over the sale of land in Cape Town's CBD and legal action resulted in a win for affordable housing on Monday, 31 August 2020 wh...

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The sale of the Tafelberg site in Cape Town has been a contentious issue in the fight for affordable housing in Cape Town's city centre. On Monday, the Western Cape High Court set aside the sale of the land and told the provincial government and the City to draw up policies that address apartheid legacies in central Cape Town.



Listen to this article
5:34

On Monday, 31 August, the sale of the Tafelberg property in the Cape Town suburb of Sea Point was reviewed and set aside by the Western Cape High Court. The 1.7 hectare site, just 2.5 km outside the Cape



Suné Payne

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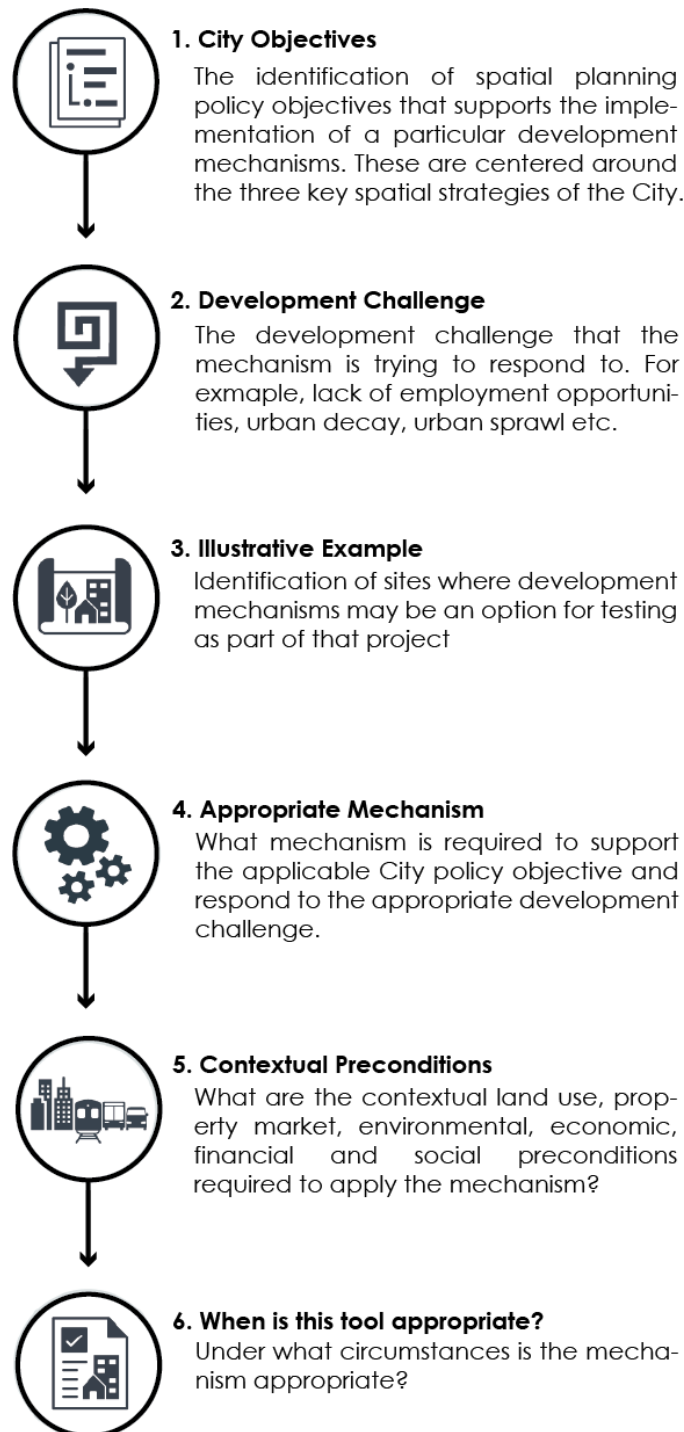
Porsche Approved

h) Example of where it can be applied:

- Private-owned or externally government-owned land parcels that are deemed strategic.
- Undeveloped and partially developed land throughout the City.

12.9. Spatial targeting and Application Framework

The following diagram describes the process and method to apply future mechanisms and extend current mechanisms to spatially targeted areas in the district. This is informed by key opportunities and constraints identified through the DSDF baseline analysis and the detailed analysis of each mechanism located in Annexure 12.



12.9.1 Spatial Targeting – ECAMP

The City is currently in the process of reviewing ECAMP (Economic Areas Management programme). Using ECAMP, local interventions will be identified which will help ensure that each business precinct performs optimally given its particular locational assets. The **development performance** indicator reflects the current level of market confidence in an area by measuring short-term price signals (i.e. sales, building work, rentals and rental growth, vacancies, etc.). **Location potential** indicator measures the extent to which the precinct is aligned to the medium- to long-term location requirements of the city's business sectors (i.e. agglomeration, land supply, crime and grime, proximity and infrastructure). ECAMP will be extended to all areas in the city (not only business precincts). Once complete, it will be used to supplement and verify that the correct contextual preconditions exist and that the circumstances allow for the use of the tool, and to provide the evidence base for pursuing the implementation mechanisms described in this report.

12.9.2 Application Framework

The following table provides a framework to identify an appropriate mechanism to enable its spatial vision and address a particular development challenge in a targeted area. This should be applied to all 8 district and associated sub-districts to identify a suite of mechanisms to support the implementation of the DSDF. The table below should be applied together with Annexure B in order to take cognisance of the costs and risk associated with each mechanism prior to their selection.

Table 18 Local Application Framework

City Objectives	Development Challenge	Illustrative Example	Potentially Appropriate Mechanism	Contextual Preconditions	When is this tool appropriate?	*	**	***
EXISTING MECHANISMS								
Support appropriate city growth; support economic growth	Market demand exists but is constrained by infrastructure availability - Bulk Infrastructure: Capital outlay is too large for the municipality or a single developer to finance upfront - Bulk infrastructure: Required infrastructure to respond to demand is not a short-term budgetary priority for the City - Connecting infrastructure	- Bellville – Tygervalley (e.g. IRT link as part of IPTN / Transport Infrastructure) - Other business nodes where strong demand (e.g. CBD property)	Development charges (i.e. impact fees)	Applicable in cities where there is a strong demand for private development	- For private development which requires new infrastructure or services - In cities where there is a strong demand for private development - Requires dedicated municipal staff to administer effectively	✓		
	Areas with clear potential for economic growth but which is currently underperforming or lagging.	- Atlantis Industria - Triangle Farm - Parow Industria - Sacks Circle - Landsdowne Industrial (known as Philippi North in ECAMP) - Elsies River	Development Application Fee Waiver	- The investment must constitute a new 'external' investment or the expansion of an existing investment in the area, and cannot simply be a relocation of businesses already based within the municipal boundaries of Cape Town. - The investment must be in a sector which enhances the value-added production capacity of Cape Town. More specifically, the proposed investment should be located in the manufacturing and specific tertiary sectors.	- This will be determined by the market potential and performance scores as revealed in the City's Economic Areas Management Programme (ECAMP). Areas with clear potential for economic growth but which is currently underperforming or lagging. - Limited to manufacturing and tertiary sectors. - The areas where the manufacturing sector incentives currently apply are: - Atlantis Industria - Triangle Farm - Parow Industria - Sacks Circle - Landsdowne Industrial (known as Philippi North in ECAMP) - Elsies River - The following sectors will be eligible for the investment incentives: - Broad Manufacturing Sector - Priority Manufacturing Sectors: - Agro-processing - Green technology - Electronics and electrical engineering - Clothing and textiles - Priority tertiary sector include: - Business Process Outsourcing (BPO), - Information and Communication Technology (ICT), - Tourism, - Film Industry.			✓
			Discounted Development Contribution					✓
			Electricity Tariff					✓
			Fast-tracking of Applications					✓
Encourage integrated settlement patterns; Encourage a more compact form of development;	Market demand exists in an area but is constrained by a variety of potential factors.	- Bellville Opportunity Area - Philippi Opportunity Area - Foreshore Precinct - Paardevelei and Athlone Power Station sites - TOD Station Nodes	Catalytic Land Development Pipeline	- Sites or projects that are strategically important the City – have the potential to be catalytic in nature. - Projects that have variety of constraints and require unique delivery capacity.	- Typically for projects initiated by public sector, requiring government approval, support and co-ordination; - capital intensive and unlikely to be undertaken by the private sector alone - include high initial risk profiles with a return on investment difficult to predict with certainty, which mitigates against private sector participation; - given their scale, can support government's socio-economic objectives, move the economy onto a new and more inclusive growth trajectory and stimulate employment opportunities; and - requires unique delivery capacity/vehicles that enables infrastructure delivery in a commercially viable and sustainable manner.	✓	✓	✓
Encourage a more compact form of development; Encourage integrated settlement patterns	Inner city environments experiencing urban decay where the City would like to facilitate the regeneration into dense and transit-oriented urban areas.	- Bellville CBD - Voortrekker Road Corridor - Wynberg PTI - Parow - Goodwood - Woodstock - Salt River	Urban Development Zone	- Delineated geographic areas - Urban centres and inner city environments (experiencing urban decay)	- Inner city environments experiencing urban decay where private sector development has been limited. - Areas where private sector investment in residential and commercial buildings is desired. - Limited to predefined geographic areas - The areas should have a high population carrying capacity with existing public transport infrastructure.			✓
	Encourage housing development in areas where the local government has identified a shortage of housing affordable to low- and moderate-income households	Khayelitsha	Small Scale Affordable Rental Units	There exists a burgeoning market of landlords doing self-build housing in incremental areas	- Incremental housing areas - Areas of informality - Sites which can support additional densification	✓		

Encourage a more compact form of development	The minimum off-street parking standards limits the full optimisation of total GLA in a development. New developments are required to allocate a certain portion of available parking area based on the size of the development which disincentives developing above a certain size.	Cape Town CBD	PT Areas	- Areas with developed public transport - Delineated geographic areas - Areas with high population carrying capacity	- Areas with high public transport accessibility, frequency and capacity - Aimed at achieving higher densities in urban areas through incentivizing development. - There is an existing demand for development and favourable market conditions.			✓
Encourage land use intensification in appropriate locations	Market demand exists but is constrained by land availability - Site fragmented ie. erven too small and/or in separate ownership - Land use rights are limiting relative to demand	TOD precinct, where demand exists, land opportunity. Eg Bellville PTI and surrounds	City-owned Land disposal	Ideally, property market in an upswing	- City-owned property no longer needed for public use - Municipality must have authority to dispose of public property for private development - Ideally dispose of land when market conditions are positive and where the site does not have major development constraints - Land may be disposed as an in-kind payment for infrastructure when the property has sufficient market value to enable a financially viable transaction - Land may be disposed as equity for development: - When there are challenges to redevelop the site making it unattractive to a private developer, the municipality may contribute the value of the land - When land is adjacent to privately owned sites and can be combined into one regeneration project - May be used to catalyse regeneration of a larger area where the market has lacked investment	✓		✓
Integrate land use, economic and transport planning and support the sustainable operation of the IPTN	Areas where the City would like to encourage private sector development through investment in land capital projects and/or leveraging land to partner with the private sector.	- Priority TOD Catalytic projects: - Bellville, Philippi, Foreshore, Paardevelei, Athlone	City-owned Land Acquisition (including Land Banking and Assembly)	- Areas of future opportunity - Areas where there is an identified need that the City can fulfil (i.e. public housing) - Servicing of land parcels	- Appropriate in locations which support City's TOD and spatial objectives but private sector interest is low - Property values are low - Areas with developed or planned future public transport - Private sector may be incentivised to invest in areas where City acquires land if those areas are subject to infrastructure-led development through public investment - Land assembly will allow for the sale of land, or if preferable, leaseholds	✓		✓
Enhance the unique sense of place and quality of the built form of Cape Town	Areas experiencing various urban management issues and urban decay.	- Cape Town Central CID - Observatory CID - Athlone CID - Parow Industria CID - Etc.	Special Ratings Areas (Improvement Districts)	Requires a rates base that can support the SRA. (i.e. not applicable in all areas)	- Existing rates base that can 'pay extra' for the additional services. - Organised, active community. An SRA is always initiated by the community and is run by the community for the benefit of the community, not by the City.		✓	✓
		- Athlone CBD - Bellville transport interchange - Bishop Lavis - Valhalla Park - Bonteheuwel, - Harare and Kuyasa transport interchanges, - Macassar, - Manenberg, - Hanover Park, - Mitchells Plan Town Centre, Nyanga/Gugulethu, - Etc.	Mayoral Urban Regeneration Programme	- Neglected and dysfunctional urban areas. - Lack of alternative funding for improved urban management.	- In former neglected and dysfunctional areas requiring upliftment. - Degraded and unsafe public transport interchanges and commercial corridors. - Public infrastructure maintenance and upgrades. - Areas where the social fibre has broken down and where there are a number of issues facing in particular the youth.		✓	✓
		Bonteheuwel Town Centre	Precinct Management Model	Lack of alternative sources of funding for improved urban management.	- Neglected Urban centres - CBDs, community nodes and town centres - In areas requiring intervention to prevent urban decay or improve existing urban management levels that do not have enough of a rates base to support the setup of an SRA.			✓
PROPOSED MECHANISMS								
City Objectives	Development Challenge	Illustrative Example	Potentially Appropriate Mechanism	Contextual Preconditions	When is this tool appropriate?	*	**	***
Encourage land use intensification in appropriate locations Encourage land use intensification in appropriate locations	Market demand exists but is constrained by land availability (or lack of appropriately packaged land) - Site fragmented ie. erven too small and/or in separate ownership - Land use rights are limiting relative to demand	- TOD precinct, where demand exists, land opportunity. Eg Bellville PTI and surrounds - Fisantekraal – Bellville Rail Corridor (land may be	Land redevelopment or readjustment scheme	There is demand for development and private sector interest	In urbanized area: - In a targeted redevelopment district where the municipality has modified zoning codes to increase the maximum floor area ratio - Where the market demand for high-density development is strong but where developable land is scarce			
						✓		✓
					On the urban fringe: - For new infrastructure projects that require land assemblage to build the infrastructure - In a market where the construction of the infrastructure is expected to result in a significant increase in the value of surrounding properties	✓		✓

		required as part of construction of second line)	Density bonuses	There is strong demand for additional development rights	- Where local property owners are willing to contribute their land to invest in improvements, in exchange for future personal gains - In strong markets where the municipality would like to encourage development of a public/social benefit not available through the private market - When market rents and/or home prices are high, land values are high, and land is scarce - Where the municipality supports additional density beyond what is currently permitted - Where there is sufficient capacity in the municipality to assign a dedicated team to administer the program			✓
		- Bellville CBD - The Voortrekker Road Corridor - Wynberg PTI - Parow - Goodwood - Woodstock - Salt River - PT1 and PT2 areas with good access to public transport	Proactive Upzoning / Rezoning (Substitute Zoning)	- There is demand for development and private sector interest - Delineated geographic areas - Urban centres and inner city environments (experiencing urban decay) - Areas with high population carrying capacity - Areas with developed public transport	- Where the municipality supports additional density beyond what is currently permitted - Municipality must have administrative resources - Where local property owners are willing to contribute their land to invest in improvements, in exchange for future personal gains - The areas should have a high population carrying capacity - Areas where private sector investment in residential and commercial buildings is desired.			✓
	Where DFAs intersect with heritage resources	DFAs which coincide with areas classified as or identified for investigation as having low/no conservation worthy heritage significance.	Heritage Exemption	Areas or sites with high urban development or redevelopment potential where heritage significance is limited or not conservation worthy in terms of S3(3) of the NHRA	- Areas of low or no heritage significance which are located outside the City's current and proposed HPOZ (Heritage Protection Overlay Zone). - This tool is appropriate in areas where the heritage value of the built environment is low and the exemption of the requirements of the NHRA will not have a detrimental impact on heritage resources and encourage investment in these areas.			✓
	NDAs which intersect with environmental resources	- NDAs that have the potential to be developed but that have some environmental features on it which cause it to have to go through extensive environmental authorisation process even though some of the sites are not considered to be of significant environmental value / protection. - NDAs located within the UIC which have development potential but a portion of the site are earmarked by environmental sensitive features such as CBA, rivers and wetlands.	Environmental Exclusion Area	- The sites which have been identified through the Land Use Model which are strategically located for a specific type of development (residential, commercial, industrial etc.)/ mix of developments. - Sites within Atlantis SEZ	- This tool is appropriate when there are sites that have high development potential to achieve the City's spatial transformational objectives to build integrated communities (i.e. essential social, recreational or urban infrastructure services, create job opportunities and provide affordable/subsidized housing) but which have some environmental sensitive features on it, however, often the environmental features are eroded / disturbed or only a portion of the site is earmarked as being environmentally sensitive. - This tool is appropriate when the listed activities that the proposed development may trigger in NEMA are not considered to have a detrimental impact on the environment and can therefore be excluded.		✓	
	Location supports City's TOD objectives but private sector interest is low	TOD precinct, where land opportunity. Eg Bellville PTI and surrounds	Tax Abatements	- Areas with high locational or development potential where interest would otherwise be lacking. - Should be limited to new investment. Ad hoc approach may be preferable so that City can gauge merits on a case-by-case basis.	- In a distressed market where property owners are not prepared to make improvements to their properties or where there is no demand to rent or purchase property - In a stabilized market if there is a lack of a social good e.g. affordable housing - To incentivise development without providing a direct cash subsidy or debt upfront - Municipality must have administrative resources			✓
	Areas which are strategically located but which for some reason are underperforming. These areas have high locational potential but due to lack of investment, capital flight of retail / commercial businesses, urban decay, crime and grime have experienced urban decay.	- Any District or geographically defined area within the City that are deemed to have high growth potential but that are underperforming. - Areas earmarked as Development Focus Areas within the applicable District Plans - Human Settlement Support Areas	Incentive Overlay Zone	- Should typically be focussed within areas which are located along developed public transport corridors / nodes - Areas which have potential for densification – CBD areas which are struggling with urban decay - Areas which have sufficient bulk infrastructure capacity - The proposed incentive should have been discussed and	- Not useful in weak markets where developable land is abundant and there is low demand for dense development, i.e. where developers can easily develop market-rate housing at lower densities and gain a decent profit, and they do not need additional density as an incentive. - Overlay zones should be used responsibly to avoid unnecessary confusion and administrative complications. - Effective in boom periods during areas of growth pressure. - Effective when trying to reach higher densities in certain urban areas and when the City want to incentivize development. - Incentive Overlay zones are excellent tools for where the base zones are compatible with the desired future.	✓		

	The challenge is to revitalise these areas through providing incentives through overlay zoning so that development and investment will be enticed in these areas.	New Development areas identified through the Land Use Model		tested with multiple stakeholders, especially the private sector / developers to determine whether it will be deemed as efficient / enticing to develop.				
Address spatial economic imbalances. Transform the apartheid city.	Affordable housing opportunities are not located in close proximity to economic or employment opportunities but there is a market demand for housing on well-located land.		Inclusionary Housing	- Demand for development - Private sector-led development	- Areas of the City with strong property markets (where there is existing value) - Strategically important transit-oriented development nodes, where density is desired - In areas with appropriate public education, health, social facilities, and near employment opportunities - In the rest of the City, an inclusionary housing requirement will be triggered when new rights are granted over a certain threshold (still to be determined).	✓	✓	✓
Facilitate small and micro scale economic development within areas accessible to scheduled public transport routes.	The informal economy experiences development challenges and require assistance / support to formalise and enable entrepreneurial efforts and SMME development operating from properties zoned SR 1 and 2 – especially within areas accessible to scheduled public transport routes where an appropriate mix of land uses should be encouraged.	High intensity residential land units and low intensity residential land units as depicted on the scheduled public transport accessibility map and as designated to have this overlay zoning (subject to the City's approval).	Scheduled Public Transport Accessibility Overlay Zone (SPTAO)	Land units within the designated scheduled public transport accessibility overlay zone.	- Appropriate in areas which experience high levels of pedestrian foot traffic, particularly those close to public transport services - Appropriate in areas which have a high concentration of informal business along structuring routes within neighborhoods, activity streets or development routes	✓		

Note:

- Certain projects may require the implementation of more than one mechanism in order to achieve the required objectives. How various tools are combined would be determined on a case-by-case basis depending on project-specific challenges and objectives.
- This table should be read in conjunction with

* Potential to generate capital financing
 ** Potential to generate operational financing
 *** Potential incentive for private (re)investment

TECHNICAL ANNEXURE 13: GENERIC ENVIRONMENTAL MANAGEMENT PROGRAMME FOR DEVELOPMENT PROJECTS WITHIN THE ATLANTIS URBAN AREA

The purpose of the Generic Environmental Management Programme for the Atlantis Urban Area is to obtain exclusion from the requirement for environmental authorisation for specific identified activities in terms of the EIA Regulations for developments within the Atlantis Urban Area.

The full document i.e. "*Generic Environmental Management Programme for Development Projects within the Atlantis Urban Area*" (Government Gazette, 7 April 2022, No. 46208) can be found by accessing the following hyperlink:

[https://www.westerncape.gov.za/eadp/files/atoms/files/Atlantis%20EMPr-final%2Bgazette-20220407%20%28CCT %20cover%29.pdf](https://www.westerncape.gov.za/eadp/files/atoms/files/Atlantis%20EMPr-final%2Bgazette-20220407%20%28CCT%20cover%29.pdf)

TECHNICAL ANNEXURE 14: PUBLIC COMMENTS AND RESPONSES

Comments and Responses on Integrated District SDF - EMF advertised 6 June - 30 August 2022		
	Comment summary/contents	Response and Action
Nr	Comments and Responses on Integrated District SDF - EMF advertised 6 June - 30 August 2022	Response
B001	There is a huge amount of development in this area. Blocks of flats are popping up ten to a dozen. Residential houses are being bought by developers and Blocks of flats are built with no regard to the individual ratepayers rights. - this must have a huge effect on the infrastructure in the area as there are many water pipes bursting as well as sewage pipes. Currently there is one outside a home on Humewood Drive and the stench is horrific. - Consideration should be given to the residents who live in houses when these new developments are being discussed. - the area is becoming less and less attractive to live in and in addition there is the ever extension, albeit it illegal land occupation, of Du Noon. - this is unacceptable and has a huge impact on the value of the ratepayers homes. - the City of Cape Town needs to work for ALL residents and not just to increase the backlog of houses with no consideration given to home owners	The comment is noted and the considerations for new development approvals has been passed on to Development Management to consider in processing development applications.
B002	Please be so kind to advise which areas / land in Blouberg are intended for this development and what type of development? I saw the Blouberg beach development plans but have not seen the housing one. Please send more details info. Thanks	An explanation of the SDF, the sections that refer to housing, and the relevant district SDF documentation was sent directly via email prior to the closing date for commenting.
B005	Emanating from SC3 SDF Public Engagement, Ward 4 Committee Item 14/03/22 (as attached) and preceding Sub- Council Activities Day meetings, ongoing concerns were raised by residents and CBOs pertaining to the enforcement of Land Use and Building regulations. These include but are not limited to: a) Slow or lack of response to land use contraventions from building inspectors b) Lack of response from land use management to problem buildings and boarding houses c) Concerns pertaining to Development Planning Applications and allegations that plans are approved without following due process. Through the Sub-Council office, may we request a meeting be arranged with District management officials from both Land Use Management and Building Development Management to address these concerns with CBO representatives, Cllr Benadie and SC Chairperson?	This comment is referred to Development Management who is the responsible department for these matters.
B006	I would like to object to the inclusion of proposed collector roads reflected on the attached map for the following reasons: 1. I do not believe there is justification for including these roads at this level of plan as this belongs to the local development plan 2. While the northerly proposed roads commences at the proposed existing access off Otto Du Plessis into consideration it is premature that any development distributor roads will follow this route as it will be subject to local plans and development levies that will be imposed on the Developer 3. In the case of the southerly proposed road the same principal as for 2 above applies. Further to this it does not take local access and road reserves into consideration. The current access to Blouberg Extension 1 is via Perlemoen road which acts as a Collector for White Waters, Ext 1 and The Ridge. There is further provision for a road reserve for the extension of Perlemoen Rd to link with Rochester Rd on the West Beach side. This will be the more logical route to link the Proposed developments on ERF 1117 to Otto Du Plessis as reflected on the attached plan in red 4. Using Gull Rd which is a residential road with speed humps to provide a local distributor is not good transport planning practice 5. The BRA has further entered into an agreement with the Municipality to fence off Gull Rd which was designed as a cul de sac in conjunction with the adjacent POS. This process has taken 7 yrs to achieve and should not impact on the development of ERF 1117 6. Lastly there is a proposal to provide a traffic circle at the intersection of Otto du Plessis and Sir David Baird subject to further developments of the area. The construction of this traffic circle will most likely result in the access to Perlemoen Rd to be linked to this traffic circle particularly if Perlemoen Rd is extended to Rochester Rd	Response from Urban Mobility; Roads Infrastructure Management and Network Planning: 1. The proposed roads are from the Public Right of Way (PROW, 2017) which shows a potential road network. The precise location of roads is subject to development proposals and more detailed contextual investigations at the times the road links are required. This layer has been used throughout the District Plan and is not definitive. 2. Agreed 3. The network is as per the PROW (2017). It is being updated currently. The development of erf 1117 would take the access and East – West link to the R27 into account. Given Gull is deemed a residential (class 5) road, there might not be a link to Erf 1117 from Gull. 4. The link from Gull to Radar is dependent on the development of Erf 1117. It might not be viable from a road access perspective, depending on how Erf 1117 develops, might be just a residential access instead of major through road. 5. Agreed, future road links are based on future needs. 6. We are aware of this proposal. The location will be considered when a link is required.
B007	I have lived in Table View all my 35 years of life. I am strongly against the densification of The Greater Table View Area instead of adhering to policy and densifying the inner-city areas. Areas that are close to work opportunities, where public transport could be financially viable and where it is cost effective to provide the critical services that our area lacks. In so doing the City of Cape Town is applying short-term thinking and not considering the long-term negative effects this rampant densification will have on residents, such as increased crime, traffic, litter and decreased property values and safety of residents. Providing housing will not lessen the amount of squatters but will just bring more people into the area. Please reconsider.	The comment is noted, but the areas and level of proposed densification within the district has been carefully considered. It has been captured in the Land Use Model which the City uses to make critical growth and infrastructural decisions related to CAPEX, such as investing in utilities. The densification proposed in the district is deemed necessary to meet to growing housing demands of the residents of Cape Town that would also like to enjoy the amenities that the greater table view area provides.
B008	I object to the development of Erf 1117 known as Happy Valley, into a low cost housing scheme. I live in West Beach. This will negatively impact on the value of all houses in the surrounding areas. The City needs to take that into consideration	The objection is noted, however the SDF is not proposing a specific development. The ERF is identified as a new development area and an area of densification to cater for the growing housing demands of the City. A development proposal will need to be submitted by the landowner and go through all required development processes. Some form of subsidised housing is supported, to deal with the housing shortage in the City. Increasing the supply of housing is an important strategic thrust of the City as outlined in the City's IDP. The City is also supporting the initiation of a Community-Driven Local SDF which will include Erf 1117 in its boundary. This will give a greater level of development guidance to the site.
B009	A big no to low cost housing on Erf 1117 this will just increase the crime which is already a problem we have and it will devalue our property which we have worked hard for. The shacks that are already there are a big problem and should be removed as well as all the other shacks that is coming up in the area what is the city of Cape Town going to do to protect us the rate and tax payers I this area.	The objection is noted, however the ERF is identified as a new development area and an area of densification to cater for the growing housing demands of the city. The framework suggests a mixed development with a variety of land uses. The provision of affordable housing is critical as it deals with the housing issues and informality faced by the City and is therefore an important strategic thrust of the city as outlined in the City's IDP. The City is also supporting the initiation of a Community-Driven Local SDF which will include Erf 1117 in its boundary. This will give a greater level of development guidance to the site. The management issues of informal settlements are not within the scope of the District Plan.

B010	this emails to note my concerns over the proposed low cost housing development on Erf 1117 (Happy Valley) in Table View, as well as the proposed densification of the Blouberg area in general. I hereby voice my objection to these developments for the following reasons: 1. Critical environmental and biodiversity zones: I thought there was supposed to be a plan to preserve the remaining dunes and wetlands in the Blouberg area? Erf 1117 is situated on one of these dunes, Blouberg is not designated as a high density node. 2. Infrastructure issues: We already have major issues in the Blouberg area with sewerage and water. We also do not have sufficient public schools for the growing population and our police station is sadly and hopelessly under-resourced. Surely the basic infrastructure needs to be upgraded and extended before any further densification is planned? There has been a massive upsurge in developments all across Table View and Blouberg in the last 10 years or so, and yet infrastructure has not kept pace. 3. Transport issues: Our main arterial road, the R27, which is the main link between Blouberg and the city centre or Southern Suburbs, is currently hopelessly congested. We already have too many private vehicles and cargo carriers utilizing this stretch. The MyCiti route is limited in its scope and there is no train service in this area. We would also like to ensure that the burgeoning taxi situation is rather curbed and controlled, as opposed to being increased, so that it doesn't become a massive problem as it is elsewhere in Cape Town. 4. Social and cultural issues: We already have a major issue with street people creating temporary shelters all around Blouberg area – often in untenable spaces. These people need to rather be located in proper shelters or encouraged off the streets. This is not happening at all and I would like to know what the city is doing about this issue. These people are often aggressive and cause problems in the busy traffic intersections. Aside from that, the general decay caused by street people brings in a criminal element...the 'Broken Windows Syndrome'. If the city is unable to manage even this, why are developers being allowed to create even more densification in this area? Higher density = more street people. 5. Value of existing properties and rates as currently paid: I would like to understand how the property rates will be calculated should there be a low income housing project situated in amongst middle and high income well established areas? I currently pay pretty high rates... but should I be situated in the vicinity of low income housing, my property value will naturally decrease. Thus my rates should decrease accordingly. Is the City prepared to reduce its income on this basis? A reminder that the city relies on us law abiding tax and rate payers to subsidize many indigent households. 6. Employment opportunities: The main employment opportunities for lower income households exist in the industrial areas and the city centre. These areas are difficult to access with the current transport system. Erf 1117 is simply not well placed from this perspective, as it's situated in an established residential area far away from meaningful employment opportunities. 7. Greedy developers being put first/Short-Term thinking: In my opinion, the city is catering to and caving into developers who are trying to make a quick buck; and are not interested in the long term planning or viability of our area. Blouberg has so much to offer from a tourism perspective, but it seems that there is no cohesive plan to ensure that the area is developed to make the most of its' natural resources and opportunities. 8. Better to formalize the DuNoon zone and create a proper area closer to main transport routes and economic hubs: The Du-Noon settlement is situated right next to two industrial areas and is on a main transport route (N7). Surely it would make more sense to create a formalized community with various grades of economically scaled housing sections; proper infrastructure; schooling and security. This way, the community would have	The mentioned portion of ERF 1117 is not proposed for development. The document suggests its inclusion into the nature reserve for conservation. The raised issues around infrastructure, transportation and socio - cultural concerns are noted. However the document is cognisant of these issues and the density and development proposals are informants to service line departments in planning upgrades. The document doesn't deal with social issues directly but it highlights social facilities within the district and makes suggestions around the provision of adequate facilities especially around areas of proposed densification. The proposals within this document have no causal effects on property valuation and questions around the calculation of property values should be directed to the Valuations Department. The document forms part of the comprehensive planning vision of the City, however it does not give or takeaway land rights. Developers acting on private land can submit development applications for consideration and they will be assessed on a case by case basis. Not all housing can be accommodated in Du Noon. New Development Areas such as ERF 1117 provide an opportunity to deal with some of the housing pressures faced by the City. These need to be paired with public transport so that job opportunities and other facilities are accessible.
B011	a. Quote of previous response to critique of public participation process b. Asserts important sites were not mentioned on the public presentation c. Complaint that documents are available at libraries, and are too long to be read quickly d. Critical that comments can be submitted at sub council offices as many people don't have access to transport e. The City is not listening and responding to the wishes of the people, the entire public process is futile. 2. Comments on Water and Sanitation Section in Implementation Chapter a. Water and sanitation challenges are raw sewerage in the street. b. Thinks the residents of Du Noon and Joe Slovo Park will be insulted that the City has an implementation plan to enable the spatial vision, after years of inhumane living conditions. c. To say the infrastructure challenges is regrettable lacks empathy. It is unconstitutional. The City of Cape Town member who are responsible for this incompetency have been paid. No one is held accountable. d. City has yet to make good on promises to solve water and sanitation issues. Just approves more development which will worsen the problem. 3. District Nodes at Marine Circle, Bayside, Parklands and Melkbosstrand a. Does not support nodes in these locations as they are not in the urban inner core and will lead to longer and more expensive commutes, unviable public transport, increased carbon footprint, are short term panic, are for developers. b. More mixed use development is needed, there is no parking along Blaauwberg Road for businesses since the MyCiti took away the slip road and informal trade along Parklands Main and outside Bayside shows there is a need for business facilities. Parklands Main road shouldn't have been allowed residential only. Against the TOD Policy. Highlights that the City cannot be trusted, is out of touch with lived conditions on the ground, doesn't learn from its mistakes. c. Thinks the nodes in the 2022 version are different from 2012, much bigger. Not like the 2012 ones which aimed to bring mixed use to specific areas. ☐ Agree with the city that nodes do not have to be in the urban inner core but densification does have to be. In creating these nodes the City is trying to bring densification outside the urban inner core and it should not be supported. ☐ The nodes are not in line with the MSDP and will cause confusion for town planners and residents, leading to conflict, higher costs to developers and communities. Rate payers end up paying the price. ☐ Contrary to the description of nodes, they are not near public transport routes for the lower income developments. The greater Table View area is not close to employment, social services or community services. ☐ Does not think the Greater Table View area is appropriate for densification. Not being 'not in our back yard', but this is totally the wrong back yard as densification should be: in the urban inner core, towards the city centre, close to work opportunities, viable public transport, major work opportunities are centred around the CBD, Epping and Bellville. ☐ Proposed rail node at Parklands is rejected as the rail system is not functional. The proposed nodes should be removed, more investigation into proposed densification is needed, including a further public participation process. TO include densification proposals in a few lines of text is	Many of these points were responded to in the previous round of Comments and Responses, and so are not discussed in detail here. This includes: the public participation process, the purpose and definition of nodes, the need to develop new areas for the city inclusive of housing, commercial and transport opportunities, why it is considered that the greater Table View area has good access to public transport and social facilities in comparison to other parts of the City, that infrastructure planning is linked to SDFs – but remains the mandate of the relevant line department eg. Water and Sanitation, informal trading being a distinct business type, Concerns and frustrations are noted. The DSDP proposal contains our best attempt to stop these issues getting worse in the future, and hopefully address some of them through planning future development. The response provided in the previous round of participation still refers and attempts to amend the document and make the suggested changes have been made. Specific items: Point 4 New Development Areas: The choice of new development areas was a professional planning exercise done by the Urban Planning Department between 2019 and 2021. More information is available on the process followed in Volume 4: Annexure dealing with the Land Use Model. Erf 1117: Development here will be subject to more detailed planning processes where the scale and type of development is addressed. The District Plan provides guidelines for any further planning. There is a Community Driven planning initiative to draft a local area framework for the Blouberg area from Big Bay to Marine Circle, roughly bound by the R27. This has the City's support and it will give more detailed planning guidelines to Erf 1117, among other areas. Erf 1694: Development here will be subject to more detailed planning processes where the scale and type of development is addressed. The public will be able to comment, as per normal development processes. Area 2 – Erf 10103, Next to Blouberg Ridge Primary: It was changed to a New Development Area for Public Services in the previous draft. The image in the letter is an older version which shows it as a new development area for residential area.
B012	See B011	See B011

B013	I would like to object to the inclusion OPEN SPACES, ERVEN 462, 463 AND 464, GULL ROAD, BLOUBERGSTRAND for low density Development on the attached map for the following reasons.SEE ATTACHED PDF: 1. These erven are zoned POS on the local development plans and should remain as such 2. The Blouberg Residents Association has further entered into an agreement with the Municipality to fence off Gull Rd which was designed as a cul de sac in conjunction with the adjacent POS. This process has taken 7 yrs to achieve and should not impact on the development of ERF 1117 3. During discussion under 2 above it was noted that development of a formal Park will be unlikely as it has been considered as an environmentally sensitive areas by CoCT 4. Based on this agreement residents have commence doing some landscaping on the erf to beautify the area 5. This is further supported by my previous objection to the inclusion of Local collector roads submitted on 11 Aug 2022	The erven's designation has been changed to structuring open space. Previous comet is responded to separately in B006
B014	See B011	See B011
B015	See B011	See B011
B016	1. Amendment of the Urban Edge for Urban development: Do not support the amendment of the Urban Edge because: • We do not believe that the full implications of such amendment have been considered by the City. Surely the planning for Infrastructure requirements has been sized to cater for the area within the current defined urban edge. • Effectively, allowing such amendment would imply that a future infrastructure shortfall to certain areas within the existing urban edge would be created. • We are not convinced that the effect of this expansion of the Urban Edge on all necessary infrastructure to the area has been considered in an integrated fashion. • Such amendment can create a precedent for further amendments to the Urban Edge in other areas without the necessary investigation of all planning and infrastructure issues. • The Urban Edge has only recently been defined and is based on considerable work, inputs and insights of many professionals at great expense to the City. Surely these inputs are worth something and should not be dismissed and changed so easily, without their express comments relating to the effects of such amendment. It is strongly recommended that new areas being developed be planned for densification and not existing well maintained suburbs where people have built up their dreams and homes. No need to destroy what is already there unless it is in a slum area that requires upgrading.	The comment is noted. The urban edge change has considered numerous factors, including that the City is pursuing a compact urban form which is more sustainable from an operational, financial and ecological perspective as per the 2022 Draft MSDF; further large scale development of the urban edge into the nuclear emergency planning zones is discouraged in line with international best practice, the relevant nuclear stakeholders and City policy; the City's population and land use modelling process estimates that there is sufficient land within the proposed urban edge to accommodate development on a 10 year time horizon, as is the time frame of this policy; the District SDF is reviewed on a 10 year basis.
B018	We Do not support the amendment of the Urban Edge for urban development because: • We do not believe that the full implications of such amendment have been considered by the City. Surely the planning for Infrastructure requirements has been sized to cater for the area within the current defined urban edge. • Effectively, allowing such amendment would imply that a future infrastructure shortfall to certain areas within the existing urban edge would be created. • We are not convinced that the effect of this expansion of the Urban Edge on all necessary infrastructure to the area has been considered in an integrated fashion. • Such amendment can create a precedent for further amendments to the Urban Edge in other areas without the necessary investigation of all planning and infrastructure issues. • The Urban Edge has only recently been defined and is based on considerable work, inputs and insights of many professionals at great expense to the City. Surely these inputs are worth something and should not be dismissed and changed so easily, without their express comments relating to the effects of such amendment. It is strongly recommended that new areas being developed be planned for densification and not existing well maintained suburbs where people have built up their dreams and homes. No need to destroy what is already there unless it is in a slum area that requires upgrading. Enough is Enough City of Cape Town we are watching you! We have had enough of the underhanded way you do business in the planning department We the rate payers have to suffer because it's a free for all. We are tired of the traffic We are tired of the stench of raw sewerage We are tired of the overpopulation Because where once single free standing house stood are now replaced with huge blocks of flats.	The comment is noted. The urban edge change has considered numerous factors, including that the City is pursuing a compact urban form which is more sustainable from an operational, financial and ecological perspective as per the 2022 Draft MSDF; further large scale development of the urban edge into the nuclear emergency planning zones is discouraged in line with international best practice, the relevant nuclear stakeholders and City policy; the City's population and land use modelling process estimates that there is sufficient land within the proposed urban edge to accommodate development on a 10 year time horizon, as is the time frame of this policy; the District SDF is reviewed on a 10 year basis.
B019	See B011	See B011
B020	See B011	See B011
B021	See B011	See B011
B022	See B011	See B011
B023	See B011	See B011
B024	See B011	See B011
B025	See B011	See B011
B026	See B011	See B011

B027	See B011	See B011
B028	See B011	See B011
B029	See B011	See B011
B030	See B011	See B011
B031	See B011	See B011
B032	See B011	See B011
B033	See B011	See B011
B034	See B011	See B011
B035	See B011	See B011
B036	See B011	See B011
B037	See B011	See B011
B038	See B011	See B011
B039	See B011	See B011
B040	See B011	See B011
B041	See B011	See B011
B042	See B011	See B011
B043	See B011	See B011
B044	See B011	See B011
B045	See B011	See B011
B046	See B011	See B011
B047	See B011	See B011
B048	See B011	See B011
B049	See B011	See B011
B050	See B011	See B011
B051	See B011	See B011
B052	See B011	See B011
B053	See B011	See B011
B054	See B011	See B011
B055	We got more than a 1000 signatures in a petition to oppose to the a development that is in hand with the Municipal Spatial Development Framework plan! Many people, due to the complicated way of commenting, are not able to comment on the CoCT website!! but I have a link with all the people commenting about the development and how this comments relate to the Densification plan!! People is angry because we haven't take into consideration basic daily problems that will add a huge impact in the future of our town! Our sewage spill problem and our lack of infrastructure for traffic, as well as the proximity to the nuclear power station have been somehow "deleted" from the common sense of developing an area!! they must be taken into consideration if such a plan is being planned!!! We are very upset in having in charge someone that cannot see this as a problem in our community!! and the consequences that it brings!!! Specially with this development comes pollution and crime in hand!!! We do not want this in our area!! we have it all over the country!! WHY would you destroy the few last jewels you have left? Here is the link, plus I have spoken to more than 600 people in person, and got the signatures, hand written with me, which I can forward, to please add them in the comments of this densification plan!! My question is, who can I give this signatures and comments, to prove that WE are not agreeing with this PLAN that is NOT taking into consideration important facts that are messing up our town!! Thanks!!	The comment and sentiment expressed is noted, although the petition refers to a single development application not the SDF. Densification is an integral part of a growing city and looks to deal with and accommodate the pressure that come with urban growth and is therefore necessary. Infrastructure upgrading and expansion required in the DSDF is addressed in Vol 3: The Implementation Plan. More detailed annual Infrastructure Planning will be done in the Sector Plans by each relevant sector eg. Water and Sanitation, Energy etc. The relevant stakeholders for nuclear safety are invited to comment on development applications within the 5km and 16km safety zones of Koeberg station.

B056	See B011	See B011
B057	See B011	See B011
B058	Before densification can be considered current public basic amenities need to be addressed This a Government Requirement which the Western Cape Govt is failing the community not only in this area but across the peninsular Schools – this year there were Eight Hundred pupils looking for a school in Table View . Where are the development sites for schools . No consideration has been given to the influx of families and children which can be expected in terms of Table View expansion Hospitals –the nearest hospital is Somerset in Green Point Doctors and Dentists – besides the clinic in DuNoon there are no Public facilities in the area . Go and look at the people standing waiting for admission –two to four hours is the norm Drinking Water – the standard is a stand pipe within two hundred metres of an informal settlement – so why are water tankers still making deliveries to informal settlements . Drinking water is a limited in the whole country. Developers should be forced to include water saving in any development. E.g. Rain water harvesting for irrigation . Infrastructure is old and failing and was not designed for high densification for example down Blaauwberg road . Water mains are frequently breaking Electricity -the whole Eskom grid is under strain. So any development should have to have Solar panels for electricity generation and water heating . The current local grid does not have the capacity so where are the new sub stations planned and Eskom certainly does not have the finances to install Storm water drains – it is obvious that storm water will be discharged through the Diep river estuary and Vlei . Has an Environmental Impact study been carried out to assess the environmental effect . It has not been included in the Draft Diep River Estuarine Plan which is trying to clean up the mess created by uncontrolled development . Sewage Capacity -- the current upgrading of Potsdam Sewage Plant does not have the capacity to manage the intended expansion . The current pump stations are continually breaking down due to old age and the number of sewer blockages in the area is not only due to misuse but also capacity Why has an additional plant not been planned for ? Private Operated Sewage Plants is inviting an environmental disaster Transport – the current traffic congestion in Cape Town is recognised as a major problem . MyCiti bus service is acknowledged that it is not financial viable due to the fact that in peak times capacity is only one way . Secondly it is already not meeting demand in terms of capacity and only services the city centre not the major employment areas . Again with the proposed rail link which has been going to be developed for the last twenty years , will only service the city centre . How does this facilitate work opportunities ? Green Corridors – in terms of the proposal where ? A green corridor should link environmental areas . There are no plans to link these areas and in fact some basic research will show that natural features are being over looked again . As an example , the planed low cost housing project on RE 268 subdivision has three wet lands . Protecting the Biodiversity is a city objective – where has this been taken into consideration by the planning department SAPS – is already understaffed , does not have the necessary assets in terms of vehicles , support staff , and facilities .Radio communication is limited and supported by the local neighbourhood watch . The whole communication system has to be replaced. Crime is on the rise and it is a fact that densification increases crime, just check the Parklands crime statistics . So we have to accept an increase in crime without the necessary SAPS	Schools – This is a provincial mandate. Based on information supplied by WCED the DSDF identifies where new schools sites are required in the Vol 2: DSDF: Sub-district guidelines and in Vol3: Implementation Plan Hospitals – The DSDF lists a new hospital site in the district as a future requirement. See Sub-district guidelines and Implementation Plan. This based on information from WCG Dept. of Health. Doctors and Dentists – Clinics are dealt with in the same manner as described for hospitals. With input City Health and WCG Health. Drinking Water – Without knowing the site referred to, one reason could be that government cannot develop infrastructure on private land. Hence informal settlements on private land often need alternative means of water supply to taps. eg. tankers or taps on adjacent state owned land. There are. Water saving and alternative sources, eg harvesting rain water for irrigation etc. are frequently included on new developments. . The Water and Sanitation Department is aware of the issues and addressing them as best possible. Please engage with them directly for further information as this is not the remit of the SDF. Electricity - Please refer to Vol 3: Implementation Plan for new planned infrastructure. Storm water drains – This is a current operational issue which the DSDF cannot address. Sewage Capacity - The infrastructure needed to support the DSDF is quantified in a land use model which the infrastructure line departments use in their Master Planning/Sector Plans. Private Temporary package Plants are an operational matter - not the remit of the DSDF. Transport – The railway is a long term proposal. Phase 2 of the MyCiti will expand its network to the city's south east. Green Corridors – These are mapped on the City's Green Infrastructure Network (GINet) and existing and future green infrastructure links are shown on the sub-district maps. SAPS – Please engage with SAPS as this is not a City mandate. Your Sub council could also be engaged to find out about City mandated alternatives in your area.
B059	See B_011	
B060	To whom it may concern Melkbostrand should not be developed due to the following reasons: - proximity to Koeberg power station (there are no proper evacuation plans, as proven with the recent false alarm, as well as too little roads to exit the town from - current sewerage and water infrastructure is not adequate (regular sewerage spills into the road and the ocean, as well as regular burst pipes due to old ceramic pipes) - high rise apartments shouldn't be allowed under any circumstances, as the it doesn't fit the aesthetic, and cultural heritage of the town. High rise flats will decrease property value on the beach front as well as leading to less beachfront parking for beach goers and town visitors. The town will lose its village charm. As it is, groups such as Beautify Melkbos have to maintain public gardens and do active tree planting and Fynbos rehabilitation, as the municipality does not. We are all full time working individuals trying to keep our village tidy.	The comment is noted. There are multiple emergency plans relating to Koeberg Power Station, evacuation and other responses in the event of an incident. The City's Disaster Risk Management takes an active role in maintaining emergency preparedness. Proximity to Koeberg is carefully considered when assessing development applications in the emergency planning area. New development applications must demonstrate that they do not compromise the evacuation plans. Infrastructure and heritage elements are considered when assessing individual development applications and development is only permitted where infrastructure capacity is deemed sufficient, as assessed by the relevant engineers. The DSDF does not address operational issues and further requests related to landscaping should be via the sub council office.
B061	See B011	See B011
B062	See B011	See B011
B063	See B011	See B011
B065	See B011	See B011
B066	See B011	See B011
B067	See B011	See B011
B068	See B011	See B011
B069	See B011	See B011
B070	See B011	See B011
B071	See B011	See B011
B072	See B011	See B011
B073	See B011	See B011
B074	See B011	See B011

B075	See B011	See B011
B076a	The Blaauwberg District Spatial Development Plan does not make provision for the ongoing financial sustainability to protect and enhance ecosystems in private ownership in highly challenging locations. The DSDF Implementation Plan provides a theoretical overview of available funding mechanisms and then applies them in respect of the spatial development components. It does not, however, address any mechanisms to fund the sustainable implementation of the EMF and environmental conservation imperatives. This is a glaring omission of which Springfontein is now a large, and high impact, case in point.	Further mechanisms could be explored to aid implementation. Currently, there are limited mechanisms for conserving on private property available such as utilising natural asset for off-set agreements, acquisition by conservationists, stewardship agreements.
B076b	Volume 3 of the Implementation Plan conveniently excludes this area specifically from the environmental priorities in it is public spending programme on p. 34.	This is based on what the Environmental Management Department (EMD) is investing in over the next 10 years. There are limitations to investing public funds on private property.
B076c	The Implementation Plan, Volume 3 of the draft Blaauwberg District Spatial Development and Environmental Management Framework, is embarrassing silent on the funding of this 1 000 ha diverse and environmentally unique area that is under intense and organised attack, as is well-known by the Environmental Resources Management Department.	The property ultimately remains in private ownership. The DSDF does not address the funding of all land. There are some mechanisms for conserving on private property available such as utilising natural asset for off-set agreements, acquisition by conservationists, stewardship agreements.
B076d	Volume 3, p.42 Section 1.6.1.b considers "Income Generation" as a "mechanisms that has a primary objective of generating income to support the implementation of the City's spatial vision." Yet, this approach is selfishly considered from only the City's revenue perspective. For instance, generation income from Nature Reserves to offset environmental cost. It should also be considered from private landowners' perspective. By generating income to support the implementation of the City's spatial vision of conservation for Groote Springfontein.	This warrants further discussion with the landowner if they wish. The challenge is to achieve a balance between appropriate urban development and nature conservation.
B076e	DSDF further fails to recognise the social and economic relationship between Atlantis and the coast. This land that is historical linked to Atlantis has always been seen as the logical next phase of Atlantis. The employment generated by the coastal node and the role that this coastal development can play in the potential growth of the Atlantis industrial area has been ignored in the latest DSDF	Atlantis has expansive undeveloped land in its urban development edge. It is not anticipated to require further land for expansion in the timeframe of the District Plan. However, serving the broader area is acknowledged in the guidelines for Silwerstroomstrand.
B076f	The development of the Springfontein coastal node is the only mechanism to ensure future controlled vehicular access to the Springfontein coast. Vehicular coastal access is thus dependent on the development of the coastal node as promoted in the 2012 BDSDF. The current draft B-DSDF does not facilitate vehicular access to the Springfontein coast.	Vehicular access to this part of the coast is not a priority from the City's perspective for the following reasons: there is access at Silwerstroomstrand nearby, the owner has applied to have the public provincial road deproclaimed and closed for reasons including that it is being used for nefarious activities such as poaching etc., thus difficult to manage the property. The District Plan does not preclude future access arrangements from being applied for.
B076g	The sewage system for the Silwerstroom resort is in a dismal state and requires significant upgrades to prevent the ecological disaster that is happening as a result. The draft B-DSDF/EMF does not address a vital upgrade to municipal infrastructure at Silwerstroomstrand but continue to designate the resort for increased use and mixed-use development. Without the rectification of the existing sewage treatment issues, Silwerstroomstrand should not continue to function as a resort for the greater Atlantis area as it is a significant threat to the freshwater aquifer in the area.	This comment has been forwarded to Water and Sanitation. Any additional development will be subject to service capacity and necessary upgrades as determined by the Water and Sanitation directorate at the point of a development proposal.
B076h	The draft MSD states on p.112 under Wastewater and Sewer Reticulation that Groot Springfontein serves a specific resort only, and there is no projected flow growth. The current dysfunctionality of the treatment works and frequent direct spillage into the ocean at a public resort, is not taken into account. It also does not tie up with the spatial directive to make made provision for development opportunities at strategically located identified coastal nodes such as Silwerstroomstrand (p 67, Draft MSDF)	This comment has been forwarded to the asset owner and Water and Sanitation.
B076i	The Draft DSDF provides no certainty for the future of the Springfontein's biodiversity and coastline, nor for limited development or intensive farming. Both draft strategic frameworks provide objectives and guidelines which are, in some cases, mutually exclusive, and in others ambiguous	These have been aligned by amending the MSDF maps and DSDF maps.
B076j	The latest DSDF is silent on employment opportunities, the economic and socio-economic benefits of a Springfontein development while it promotes conservation to the detriment of the resident community. If the B-DSDF 2022 is approved and implemented, the city will once more fail the community of Atlantis and Mamre.	The City owned Silwerstroomstrand coastal node (located to the north of Springfontein) has been identified for conversation. The Biodiversity Management Branch is working towards this on City owned land. Springfontein remains in private ownership, it is therefore the land owner's responsibility to facilitate securing their own biodiversity in terms of NEMA requirements.
B076k	The draft MSDF is not clear on Urban Edges in the Springfontein / Silwerstroomstrand area. Map 4.1: Spatial Transformation Areas (STAs) shows Springfontein is orange as a consolidation area.	This has been changed to show it as a Critical Natural Asset.
B076l	Silwerstroomstrand coastal node is not indicated on the MSDF Consolidated Map	Silwerstroomstrand is a local node. Only Metropolitan and District nodes are shown on the MSDF.
B076m	Proposal is made to Retain the Silwerstroomstrand and Springfontein nodes as per the existing 2012 B-DSDF.	The proposals as per the 2022 draft have been retained and this recommendation has not been adopted.
B076n	Indicate Springfontein as a small local new development area in the vicinity where the coastal edge made provision for such development.	The 2011/12 north western growth corridor and other potential urban development nodes, including
B076o	Add "Springfontein" in section 4.1.4 Sub-district 4: West Coast land use guidelines to the Spatial Objectives for Silwerstroomstrand to read: "Recognise Silwerstroomstrand coast as a new development opportunity with Springfontein in support there-of and give guidance to its possible development." The "Supporting Land use Guidelines" for Springfontein could include linking the limited development to protecting and funding the balance of the land as a nature reserve in perpetuity and contributing and support to the enhancement of facilities at Silwerstroomstrand by, amongst others, creating an eco-friendly walkway between Silwerstroom Resort and the Springfontein beach.	The guidelines were updated based on the 2021 comments. No further changes have been made. The guidelines are less specific than what has been recommended now.
B076p	Adopt the development guidelines of the 2012 B-DSDF as far as it relates to Springfontein and Silwerstroomstrand.	This recommendation has not been adopted.
B076q	Make provision for the concept of conceptual designation as per the 2012 DSDF. Allow for the urban and coastal edge in the Springfontein coastal node to be flexible and for the final edges to be inform.	This recommendation has not been adopted. The Coastal edge reflected is the gazetted Coastal Management Line.
B078	See B011	See B011
B079	See B011	See B011
B080	Same as B058	See B058

B081	See B011	See B011
B082	General issues - Structure of documents across the districts is inconsistent in the Table of Contents, map names differ across districts, there are editing errors to be fixed. Specific NDA errors highlighted - none in Blaauwberg.	Thank you for the comments on the DSDFs. We have worked on making the documents more consistent and correcting errors such as the missing caption. Thanks for pointing out -have added a caption to Klein Dassenberg Map the 2022 draft pick out for comment does not give a number of households to be accommodated. This is perhaps a figure from the 2012 document which gave potential yields of New Development Areas. The SDF is not proposing a specific development. The ERF is identified as a new development area and an area of densification to cater for the growing housing demands of the City. A development proposal will need to be submitted by the landowner and go through all required development processes. Some form of subsidised housing is supported, to deal with the housing shortage in the city. Increasing the supply of housing is an important strategic thrust of the City as outlined in the City's IDP. The City is also supporting the initiation of a Community-Driven Local SDF which will include Erf 1117 in its boundary. This will give a greater level of development guidance to the site.
B083	I note with concern your plans to put 1,000 low cost houses in Erf 117 (Happy Valley) next to the R27 in Table View. A number of potential problems are raised: 1. I am alarmed that the EIA was done TEN YEARS ago. Surely situations change e.g. population growth, infrastructure, job opportunities. I feel the EIA needs updating before the project is embarked upon. 2. A major concern is that this area is within the 16 km Urgent Protective Action Zone of Koeberg Nuclear Power Station. People needing low cost housing will probably not have much private transport. If there is a problem at Koeberg and the area needs to be evacuated this will be extremely difficult to meet the 16 hours limitation for evacuation especially with 5,000 extra people needing public transport to move along the already restricted roads. 3. As it will be a purely residential area there will be no nearby, easily accessible, work opportunities for the people. If more residential areas are constructed the job opportunities will be lessened, as there will be no industrial sites providing employment. 4. Apropos point number 2, a new transport system is necessary to get the people to potential job opportunities BUT this will add to the cost of living for those in the new Happy Valley area due to travel expenses. Transport to established industrial areas will cause even more congestion on the north/south road transport. There will be a need for completely new roads to manage the increase in demand. 5. Pressure on the infrastructure, mainly the supply and maintenance of sewage and water supplies, will require upgrading before adding 5,000 more people to the systems. 6. Additional infrastructure to support the 5,000 plus people who will be living there, such as schools, hospitals and clinics, police services, churches as well as shopping centres to supply the food they would expect at a price they could afford will be needed. 7. Comments re opening transport routes are noted. Will they be in place before or after the 1,000 low cost houses are built? Surely the housing is necessary and can't wait for roads to be built, but how will the transport needs of the new community as well as the already established community be met if the roads etc. are not first upgraded? 8. In Point 3.2.1 of The Blaauwberg District Plan Final Draft 2012, you note that "Parts of the district (e.g. Parklands, Sunningdale, Tableview, Big Bay) have been experiencing rapid growth, while other areas within the district in need of investment have been largely avoided by the market". If this is so, why not upgrade the areas avoided by the market to bring new investment, shopping malls, schools etc. into them? What has changed in the last 10 years? 9. What control of population numbers will be implemented? Cape Town has seen a dramatic rise in the number of homeless. This needs to be	Specific responses: 1. The EIA has a life span and will be reviewed if that time expires before any development has been actioned on the site to make sure it represents a legally compliant current picture, as per the relevant EIA legislation. 2. This is a major consideration for all new development within the 16km zone. New residential development is subject to demonstration that the emergency plans will not be negatively impacted, this is done through a Traffic Evacuation Model to ensure that the estimated increase in population will not reduce the ability of the area to evacuate within 16 hours. 3. There are new commercial and industrial areas planned in the district. The development guidelines for Erf 1117 in Sub-district 3 also support a mix of development, not only residential as the site is too big to be monofunctional. 4. This is also a good point. The ability of the existing road network and available public transport are considered when a specific development is proposed in the land use application process. It cannot be quantified without a specific proposal. 5. The availability of infrastructure services are also assessed in a land use application process (i.e., when the development application is submitted). Line departments comment on if there is available capacity for the proposal, and if not, can make development conditional on improvements being completed. Each development is dealt with on a case by case basis. 6. Agree 7. This would be dealt with at application stage. 8. This is a good point and is a major strategy of restructuring the City to be more equitable. In the District Plan these are identified as Urban Support Focus Areas. These are specific areas which are in need of public investment. Some guidelines for this investment is given in the Sub-district guidelines.
B084	1. Vol 1, Page 168, Figure 62: Portion 38 of Farm 152 should be shown as an approved "Landfill Site". 2. Vol 1, Page 175, section 12.2.2.3: Can the statement "... a higher risk private hazardous waste facility is located next to the landfill." be amended to read "... a Class A private hazardous waste facility is located next to the landfill." This is in accordance with the Vissershok Waste Management Facility's (VWMF) Waste Management Licence. 3. Vol 1, Page 187, second paragraph: The statement "A private hazardous waste facility located adjacent to the City facility has resulted in a large no-build area." is not correct. With the exception of the City's landfill site to the east of the VWMF, the entire area adjoining the VWMF is zoned Risk Industrial. Buildings permitted in the Risk Industrial Zone are permitted in this area. 4. Vol 2, Page 100, Figure 16: The extent of the VWMF landfill site is not shown correctly. Please note that Portion 38 of Farm 152 is zoned Risk Industrial Zone, for the purposes of landfill. In this regard, please refer to the attached SG Diagram showing the correct extent of Portion 38. 5. Vol 2, Page 128, Figure 20: As above 6. Vol 3, Page 25, Figure 6: As above	1. The map has not been updated. It is using 2019 information and is dated to indicate so. 2. Amended as per suggestion 3. Amended 4. Amended 5. Amended 6. Amended

B085	There are five parts of the Century City that are incorrectly identified on the draft Blaauwberg DSF and the Sub District 1 plan, as detailed below: 1. A portion of Century City around the intersection of Century Avenue and Edison Way is indicated as a water body (refer to Figure 4). As evident from Figure 5, which is an aerial photograph of this area of Century City, it is clear that there is no water body and it should be identified as Urban Development.. 2. There are two areas identified as New Development Areas (refer to Figure 3). These two portions of Century City, being the Bridgeways and Mercantile Precinct are part of the Century City development for which development rights were granted in the mid 1990's. The Bridgeways Precinct used to accommodate the Ratanga Junction Theme Park which has been decommissioned and removed, resulting in the progressive re-development of this Precinct based on market demand. It was always planned that the Mercantile Precinct would be developed last. Consequently, both areas identified as New Development Areas should in fact be identified as Urban Development (as is the case with the rest of the developable area of Century City). 3. Part of the Knights Bridge residential development is identified as Structuring Open Space (refer to Figure 4). It is clear from Figure 2 that this also should be identified as Urban Development. 4. Part of the canal system which runs through the Waterford and Mercantile Precincts, is identified as a Major Corridor, while two Flexible Corridors are indicated in the Bridgeways Precinct. Both of these land uses form part of the Green Corridors, which according to the draft DSDF, " ... provide a range of services to the built and natural environments. They improve biodiversity, enabling species dispersal, limiting animal and plant population isolation due to habitat fragmentation, and increasing habitat for species. Green corridors can assist with climate change adaptation by reducing the urban heat island effect, improving urban ventilation, assisting in flood prevention and enabling water infiltration." The canal running parallel to the N1 freeway should be identified as being part of the water body Spatial Planning Category as it forms part of the overall Century City canal system. The green spaces to be included in the Bridgeways Precinct form part of the usable open space system and do not constitute Major and/or Flexible Corridors, and therefore should be removed. The approved Precinct Plan for the ex Ratanga Junction Theme Park section of the Bridgeways Precinct is attached for your information in Annexure 3, while Figure 6 is a relatively recent aerial photograph of this area of Century City.	1. Map updated 2. Map updated 3. Map updated 4. The canal running parallel to the N1 freeway has been referred to the Green Infrastructure Network team for consideration in the next update. The green spaces to be included in the Bridgeways Precinct have been included as green infrastructure corridors. Note, this does not mean they are exclusively biodiversity links, but that they play a role in green infrastructure services such as providing open space for recreation, stormwater, air quality improvement through plants etc. The GiNet does not mean urban development is incompatible in those areas, rather it highlights that there are aspect of green infrastructure which should be considered. Requests for detail per site/ corridor should be directed to the City's Environmental Department, and may be available on a public viewer in future.
B086a	Overriding concern: It is imperative that the Draft BSDF recognises and endorses the need for a Local Area Spatial Development Framework for the north-western portion of sub-district 3; and furthermore, ensures that the BSDF does not in turn limit the potential for a LASDF to go into the necessary detail that would be required. To be read in conjunction with 2021 comment and response. Comment on densification strategy for the local area cannot succeed in a context of already inadequate: Note is taken of the City's response, however our concerns regarding a lack of infrastructure to support the densification and new development proposals set out in the BSDF are still valid and in fact more pronounced since our previous comment. Without a detailed Local Area Plan for this extremely large NDA, it is impossible for the line departments to comment sensibly and indicate mitigation upgrades, and whether these would even be feasible. In particular our concerns are: • Public Transport. Concern is expressed in relation to the slow roll out of the MyCiTi IRT system across the City, with seeming little expansion of the system taking place in the last few years. It is all very well that one can catch a MyCiTi bus from Table View to Cape Town, until one can catch a MyCiTi bus from Table View to Bellville or Table View to Claremont or Table View to Khayalitsha etc., the system cannot be regarded as a viable alternative to the private vehicle. Given the pace of the current roll out, such connections seem to be at least 10 years away. • Traffic Flow. While appreciation is expressed as to the road widening construction currently underway in the vicinity of the R27, Big Bay Boulevard/Berkshire Boulevard Intersection, concern is expressed with regards to the proposed connector route between West Beach and Blouberg Ext. 1 in particular, which could result in significant amounts of traffic using this an alternative route to and from the beach during holiday seasons. The community has in years past voiced its opposition to the City in relation to a similar proposed connector route and remain vehemently opposed to this connection. As will be elaborated on further in our comment letter, such local connector routes are best dealt with in local area level spatial planning. • Sewerage capacity. We are extremely concerned with regards to the disclosure last year of significant capacity constraints in relation to the Potsdam sewerage treatment works that serves most of the Blaauwberg District Area. The City has already placed a moratorium on planning approvals for developments of more than 10 residential units etc. unless temporary treatment package plants are provided. We also have it on good authority that the Potsdam upgrade project is falling behind schedule and that the required upgrade of the treatment works may only be completed in 2027 by which time the DSDF will probably be up for review! Taking the above into account as well as constraints with Eskom related electricity supply, the City is urged to investigate, propose and actively facilitate appropriate and sustainable off-grid infrastructure solutions of a permanent nature, failing which the entire development and densification vision of the 2022 BSDF will be largely unworkable.	The local area planning priorities are detailed in Vol 3: Implementation Plan. The beachfront is included as a local area planning priority already. The community is initiating a Community -driven planning initiative with City support.
B086b		The concerns are noted and referred to the relevant line departments. Volume 3: Implementation Plan sets includes infrastructure projects required to support the development vision in the District Plan. A Community Driven Planning Initiative is being initiated, with city support. See B006 for a response re proposed roads.

B086c	To be read in conjunction with 2021 comments and responses. Koeberg & Associated Emergency Planning Zone inadequately considered. Further Comment in Light of 2022 BSDF Proposals: Perusal of Technical Appendix 14 does not seem to indicate that either Eskom or the NNR have formally commented on any documents formally circulated to them, and your response above suggests documents must still be circulated to them. This is concerning and may require intervention of a more direct/higher level in order to illicit comment. The fact that comment has yet to be obtained from the NNR regarding the proposed densification within the 16km zone highlights the critical need for a Local Area Plan which can consider and properly incorporate the concerns related to Koeberg.	The impact of the Koeberg & Associated Emergency Planning Zones have been thoroughly considered in the District Plan. Emergency Planning is dealt with through multiple committees and stakeholders. New development rights are subject to demonstration that the emergency plans will not be negatively impacted. Developments are assessed when there is a specific proposal. The National Nuclear Regulator and Eskom are part of intergovernmental committees which are notified of draft documents and sign off on the MSDF.
B086d	To be read in conjunction with 2021 comments and responses. Designation of Public Open Space for infill residential development contrary to Governing Principles. Further Comment in Light of 2022 BSDF Proposals: While the above response from the City is noted, we are concerned that Erf 464 has not been redesignated to POS in your latest draft. This is unacceptable to the local community who use this open space on a daily basis. Furthermore this open space has an Eskom early warning siren located on it as well as a stormwater outfall related to Blouberg Ext.1 which have clearly not been factored in to the redevelopment proposals. It should also be noted that per the submission from the 'Friends of Blaauwberg Conservation Area' (in response to the CoCT's Draft BSDF), critically endangered vegetation species have recently been recorded on erf 443 and adjacent open spaces by a team lead by Ms Pat Tilmuss, (the City's former ERM Head for the Blaauwberg District). A motion has now been brought to Sub Council to link erf 443 and other critical Open Spaces (including erf 464) via means of a biodiversity corridor to the Blaauwberg Conservation Area. As such we strongly object to any zoned Open Spaces (erf 464) being designated in the Draft BSDF for urban development as well as other undeveloped rural and agriculture erven (erven 452 / 461/ 462/ 463/ 464) that may yet form part of this future biodiversity corridor and which have been designated for urban development in the Draft BSDF. Rather we propose that the exact alignment and extent of the biodiversity corridor be determined by the relevant specialist as part of a Local Area Spatial Development Plan which can undertake the necessary studies and obtain the critical support from the local community for any future integrated urban development.	The New Development Areas have been removed.
B086e	To be read in conjunction with 2021 comments and responses. Negative Impacts of Informal Trading and Taxi's ranks along Otto du Plessis Drive not adequately investigated Further Comment in Light of 2022 BSDF Proposals: Our comments still stand- the City is not coping at present and the existing problems will become exaggerated. Such matters only highlight the need for a Local Area Spatial Development Framework (LASDF) for the Big Bay/Bloubergstrand and surrounds area.	These aspects can be addressed in a local area plan, they are beyond the remit of the District Plan.
B086f	To be read in conjunction with 2021 comment and response Future Development status of Erf 1117 Blaauwberg: Proposed Framework contrary to Governing Principles. Given the significant political and community will for this LASDF to occur, along with the fact that preliminary work on the LASDF has already commenced, it stands to reason that the Blaauwberg DSDF (and its proposals for the LASDF study area in particular) must already factor in the future LASDF. The proposals of the BSDF must therefore be amended to record the need for a LASDF and then also ensure that they allow sufficient flexibility for more detailed local area spatial planning directives to emerge as a result of the LASDF process. Thus they must be more broad based than is currently the case. This particularly pertinent as not only will the BSDF be adopted prior to the LASDF, but planning law requires the proposals of the LASDF once adopted to be consistent with the adopted BSDF (District level) and MSDF (Metro level). Additionally, the demarcation of Collector Roads in the Draft BSDF is premature and at a level of transportation planning better suited to a LASDF. Furthermore, the alignment of the collector roads indicated in the Draft BSDF are not in keeping with other high order road network plans nor do they take local existing access roads into consideration. We request the City to remove these roads from the current Draft BSDF until a more detailed planning has been undertaken as part of the LASDF.	The local planning priority areas are identified in Volume 3: Implementation Plan, including the beachfront. An overview of the criteria for selection is also included in Vol 3 and the technical Annexure in Vol 4. These are intended to be updated on a regular basis. The guidelines have been relooked with this comment re flexibility and alignment. The proposed roads are still shown. It is important to show that the development of the site will need to be connected into the surrounding area, on principal. The road alignment is the Public Right of Way Network (2017) which has been used across the District Plans.. It is undergoing a review currently and the comments have been given to the team reviewing it. The written guidelines for Erf 1117 have been amended to reflect that the exact delineation would be subject to more detailed planning. The connections are indicative. See comment and response to B006 too.
B086g	To be read in conjunction with 2021 comments and responses. Local Spatial Development Frameworks need to be undertaken for the entire Beach front area from Dolphin Beach to Big Bay. The above response is appreciated. Further to our 2021 comment the focus will now shift to a community driven LASDF for the Big Bay and Surrounds area, which will encompass some of the above-mentioned section of beachfront. The recently commenced Dolphin beachfront upgrades are also noted with appreciation.	Noted and supported.
B087	Same as B086	See response to B086
B088a	In reference to the previous comment , it is noted that the City did not incorporate the changes to the District Plan or MSDF in response to the comments submitted. Volume (4) of the draft Blaauwberg District Plan (2022) includes a summary of the comments / arguments previously submitted, with a concise unsubstantiated response by the City, which in our view does not consider the complexity and potential relating to the farm Morning Star 141/5 and its spatial designation as 'Discouraged Growth Area' and 'Critical Natural Assets' in terms of the City's draft spatial policies.	A further meeting was held with the author and their client during the advertising period 6 June - 30 August 2022, where the information presented here was discussed. Most of the farm is designated structuring open space, with some minor core biodiversity areas. The arguments and motivations submitted have been considered and there are merits to them. However, the reasons for designating the farm as a Discouraged Growth Area and outside the Urban

	The objective of this memorandum is to provide the CoCT: Spatial Planners with comment on their response and on the basis thereof to provide a broad overview of the future development potential of Farm 141/5 Morning Star. It is still our considered opinion that the spatial designation of Farm 141/5 Morning Star and direct surrounds be reviewed and amended from "Discouraged Growth Area"; "Core Biodiversity" and "Structuring Open Spaces", to New Development Areas and Biodiversity & Open Space Network and incorporated into the spatial proposals of the Blaauwberg SDF accordingly. It is further proposed that the urban edge be immediately realigned exactly in accordance with its 2012 alignment. In this regard, the CoCT have in our considered opinion overlooked / ignored critically important factors growing the Cape Metropolitan area.	Development Edge Line remain relevant at this point in time with the information at hand. The 2011/12 north western growth corridor and other potential urban development nodes as previously reflected in the 2011/12 CT SDF and the District Plans, were contracted in the 2018 MSDF as approved by Council. This change in policy was brought about by: several litigation cases, being informed of investigations to renew and expand Koeberg as the only Nuclear Power Plant on the African continent, and a declared Inter-governmental Dispute between the City and the Minister of Mineral Resources and Energy, as well as the National Nuclear Regulator concerning the location, scale, density and speed of urban growth in the 0-20km zone surrounding the Koeberg Nuclear Power Plant. The 0-16km zone is especially sensitive to increases in permanent and transient population and employees. Section 158 of the DMS/ MPB-L regulates application processes in this zone. These factors remain, with the Dispute ongoing. The input regarding biodiversity has been forwarded to the team responsible for updating the Biodiversity Network, although no attachments were part of the submission. Further inputs regarding updates to the City's Biodiversity Network can be directed to enviro@capetown.gov.za. If the owners would like to pursue urban development on the property, separate application processes would have to be followed, acknowledging the above listed risks, inclusive of EIAs under NEMA, LUPA, Act 70 of 70 (if applicable) and extensive engagement with ESKOM and the National Nuclear Regulator.
B088b	It would be regarded that the information contained within this memorandum is considered as a valuable input/addition to the City's database and specifically relevant as input to the current review of the spatial development proposals, specifically relating to creating appropriate development along the interface between the urban uses of the City and the rural productive agricultural areas. Specific reference is made to the recently approved Frankendale Industrial Development and the pending construction of the Van Schoorsdrift full diamond interchange on the N7 which are directly adjacent to Farm 141/5 Morning Star. The implementation of this development and the significant road infrastructure investment is most significant given the scale, the strategic nature of the land uses proposed and the imminent timing thereof. The development will generate significant construction jobs and is expected to generate approximately 25 000 employment opportunities, once completed (i.e., in its operational phase). The proposed Morning Star site is considered strategically important within its spatial context, and its catalytic role in promoting much needed economic growth along the N7 corridor.	
B088c	Some of the biggest challenges currently faces by the City of Cape Town are poverty, housing shortages (associated with overcrowding), a lack of spatial integration, and a backlog of educational- and health facilities. The N7 Corridor (refer to below) offers a strategic spatial development opportunity to unlock economic potential and in doing so, redress spatial inequity, by creating a development that caters for all income groups redressing the need to integrate Atlantis with the Cape Metropolitan area. The facts are that the City of Cape Town has limited options for growth beyond the current urban boundaries. The City is surrounded by valuable farmland, biodiversity corridors and mountainous terrain. As per the City's Growth Options Study there are only two directions in which the City can realistically grow, up the West Coast toward Saldanha (N7 Corridor / Western Growth Corridor) and northwards towards Fisantekraal along the Lucullus Road Corridor.	
B088d	Farm 141/5 Morningstar offers a unique opportunity to the City to promote and facilitate the N7 Corridor of Cape Town by bringing in bulk services financed by the developer; and through introducing ground-breaking developmental and regenerative principles that will create a sustainable settlement	
B088e	The facilitation of the development of this N7 corridor will create the vital link between the Atlantis community and the rest of the CBD, integrating them spatially and economically into the greater economy.	
B088f	north). Although the 566 ha Morningstar Farm (Farm 141/5) is only one piece within this larger corridor, it is a vital catalytic component as it will initiate the bulk services and other infrastructure necessary to unlock the land in the remainder of the corridor to the North. Of key importance to the corridor is the railway line which runs the length of the corridor. When upgraded to a commuter line, development nodes will grow at the railway stations. The	
B088g	While we note that the City is pursuing a compact urban form, we are of the considered opinion that the term "sufficient land within the urban edge" does not account for the accessibility, quality, and overall development potential of available land. The development potential of land is a factor of numerous key factors, including economic, social, physical and accessibility considerations. A broad statement that there is sufficient vacant land within the urban edge is simply disingenuous. It is thus recommended that the following site-specific reasons related to Farm 141/5 Morning Star should be taken into account: • Significant growth in the past 10 years, with the greatest growth being experienced in Bloubaerg (population increased by 37 568 inhabitants) and Atlantis (increase of 16,698 inhabitants). • Farm 141/5 Morning Star is located adjacent/ in close proximity to Morning Star Smallholdings and the approved industrial development, Frankendale, and the expanding Wolwerivier Residential Area. The proposed development would thus encourage densification near existing development and economic opportunity, rather than contribute to urban sprawl. Furthermore, we are of the considered opinion that Farm 141 Morning Star contributes to operational(1), economic(2) and ecological(3) sustainability due to the following reasons: Operational: • The site is strategically located near the railway, and major arterial and principal arterial roads. • Morningstar site is located near Melkbosstrand Road which is close to an existing MyCiTi bus stop. • Berkshire Boulevard is a proposed road in the study area which has been identified as a future bicycle and MyCiTi bus route. This will have a positive impact on connectivity and increase the desirability to live and work in the area. • Use of rail infrastructure would promote the use of public transport and could reduce congestion into the Cape Metropolitan and Century City area. Economic: • The study area is a very large growth area, which has experienced a rapid increase in population through the delivery of housing. This has created a number of residential opportunities which are relatively close to economic nodes, particularly Century City, and existing industrial areas. In the short to medium term this growth is expected to rapidly increase given the proposed development. It can be expected that there will therefore be an increasing need to provide mixed-use development opportunities to complement the residential growth expected. • Wolwerivier is expanding, whether city acknowledges it or not, and thus the demand for accessible job opportunities is increasing. Ecological: • As shown on the Biodiversity Network Plan, there is very little biodiversity on the western portion of the site (proposed development site), and the development will thus be ecologically sustainable. • The majority of site has low biodiversity value as per botanical study and so is therefore logically considered more appropriate for urban development. Please refer to attached specialist reports which further substantiates that the proposed development will not compromise the envisioned compact urban form, and will contribute to operational (1), economic (2) and ecological (3) sustainable development. Development within the Koeberg Emergency Planning Zone. • The importance of the Koeberg Emergency Planning Zone is noted and will be considered. • No development is proposed within the 5km Emergency Planning Zone. • All requirements of the Koeberg Nuclear Emergency Plan's Traffic Evacuation Model (TEM) will be taken into consideration and adhered to. • Comprehensive Traffic Impact Assessment will be undertaken to prove that the emergency plan will not be negatively impacted. • The necessary discussions will be held with Eskom.	
B088h		

B089a	Comment on Portion 1 of Cape Farm 32 (Brakkefontein) 1. Portion 1 of Cape Farm 32 is strategically located as it forms an important part of the future infrastructure required to provide waste management services to existing and future developments and new infrastructure associated with evolving legislative requirements. The farm is located adjacent to Brakkefontein Road, approximately 3 km from the R27 (West Coast Road) and Brakkefontein Road junction. The 2022 Draft Blaauwberg District Spatial Plan designated a part of Portion 1 of Cape Farm 32 as a Landfill Site/Transfer Station outside of the 'urban edge', as shown in the District Plan Extract below (Figure 1.1). 2. According to the spatial planning designation for the property, in terms of the 2022 Draft Blaauwberg District Spatial Plan, as shown below, where only the northern part of the property is designated for Landfill Site/Transfer Station, are considered inappropriate. Said designation provides no opportunity for future expansion of the intended waste management facility. 3. It is the intention of our client to construct a regional waste management facility, serving not only the City of Cape Town but also surrounding municipalities and towns (such as Stellenbosch Municipality, Drakenstein Municipality and Swartland Municipality). There is a dire need in the City of Cape Town for a waste management facility that has maximised capacity and a long term expanded life time of 30 to 50 years. 4. Portion 1 of Cape Farm 32 (Brakkefontein) has not been used for Agricultural purposes in the last 10 years. Please refer to Figure to 2 below indicating the historical process of the farm from 1960 to 2022. Request is hereby made to: Amend the wording of the designation on the Blaauwberg District Plan from "Landfill Site/Transfer Station" to "Waste Management Facility"; and To expand the Waste Management Facility designation across the entire Portion 1 of Cape Farm 32 (Brakkefontein) excluding the part located inside the 5km Precautionary Action Zone (PAZ). We request that the motivation and factual inputs provided above be duly considered and included into the final review of the Blaauwberg Spatial Development Framework.	On engagement from the Solid Waste Department the terminology was changed on the Sub-district map and the polygon was not changed.
B090a	Implications of Future of Koeberg Nuclear Power Station for the BSDF: Clarity is required as to the ultimate life span of the KNPS, as it is understood that the NNR has not yet agreed to the application by Eskom that its lifespan be extended. This is important as the development restrictions (or ultimate lack thereof if the KNPS is decommissioned), will have a marked impact on development in the Blaauwberg District. Perusal of Technical Appendix 14 does not seem to indicate that either Eskom or the NNR have formally commented on any documents formally circulated to them with regards to the KNPS. This is concerning and may require intervention of a more direct/higher level in order to illicit comment. Reference is made to the following statement in Section 4.1.4(a) West Coast Area land use guidelines: Guidance in points b – d below will be superseded once the Regulations for Development around Koeberg are promulgated by the Minister of Mineral Resources and Energy and/or the review of Item 158 of the City of Cape Town's Development Management Scheme is approved by Council. Points b-d refer to the restrictions and evaluation process for new development within the 0-5km and 5-16km Koeberg Restriction zones. The concern here relates to the Minister of Mineral Resources and Energy replacing the standard provisions with new ones, without any form of public consultation on this matter (that we are aware of).	The impact of the Koeberg & Associated Emergency Planning Zones have been thoroughly considered in the District Plan. The National Nuclear Regulator and Eskom are part of intergovernmental committees which are notified of draft documents and sign off on the MSDP. The guidelines in the DSDP have been tweaked to refer to a review rather than supersede. For interest, the process to gazette regulations would require advertising for comment.
B090b	Implications of Potsdam Treatment Works Capacity Constraints on Vision of BSDF: We are extremely concerned with regards to the disclosure by the City last year of significant capacity constraints in relation to the Potsdam sewerage treatment works that serves most of the Blaauwberg District Area. The City has already placed a moratorium on planning approvals for developments of more than 10 residential units etc. unless temporary treatment package plants are provided. We also have it on good authority that the Potsdam upgrade project is falling behind schedule and that the required upgrade of the treatment works may only be completed in 2027 by which time the DSDP will probably be up for review! Taking the above into account as well as constraints with Eskom related electricity supply, the City is urged to urgently investigate, propose and actively facilitate appropriate and sustainable off-grid infrastructure solutions of a permanent nature, failing which the entire development and densification vision of the 2022 BSDF will be largely unworkable	The comment is noted and the issue of infrastructure capacity remains a concern. The infrastructure sector plans detail line departments plans to address capacity issues. The DSDP proposal contains our best attempt to stop these issues getting worse in the future from a spatial planning perspective.
B090c	Comments Relating to the Proposed Koeberg Road Corridor North of Malibongwe Drive: Notwithstanding the comments in paragraph 3.3 above, it would be rightly pointed out that the 2022 BSDF does in fact make provision for a northern growth corridor – the so-called Koeberg . The Need to Urgently Revive and Extend the So-called Parklands Main Road/Koeberg Road Development Corridor Road Corridor. This is acknowledged and appreciated. The corridor however only extends up to the south of the Morningstar smallholding area, and also does not incorporate land along Koeberg Road and Parklands Main Road extensions that does not form part of the Blaauwberg Nature Reserve. Our argument is thus that given the magnitude of the housing shortage, the new growth corridor would not be big enough to accommodate the housing demand over the next 5-10 years. The further statements are submitted in further support of the argument that the new development corridor North of Malibongwe Drive as proposed in the BSDF needs to be expanded: • Only a relatively small area of the corridor is earmarked for new residential development (medium density). The rest of the corridor comprises the land fill site, industrial uses and two mixed use intensification areas (the latter could accommodate some affordable housing, but other land uses will most likely take precedence); • The amount of new housing provided for the in the BSDP vs. the actual housing shortage has not yet been fully quantified/updated to reflect the current situation in 2022 (A detail density and unit number assessment is required); • Further development around the future Parklands Main Road and Koeberg Road extension routes is in our view possible and would be well integrated via these routes into development to the south; • Significant parcels of land owned by Garden Cities and Communicare (both with a track record for large scale affordable housing) exist just to the north of the Morningstar smallholding area. See image attached in comment	Noted, please see B088 for a response regarding the contraction of the northern growth corridor vs 2012.

B090d	Comments Relating to Phase 1 and Phase 2 Sites and Surrounding Koeberg Corridor Area to the South of Malibongwe Drive: The Metro/District Development Route hatching on the plan tends to obscure the colour of the SPC categories and make it difficult to assess which SPC actually applies. This is a general comment in relation to the BSDP as a whole, but in relation to the Phase 1 and Phase 2 sites, the additional depiction of the power lines and road names does not help – it generally makes it very difficult to assess the provisions applicable to these sites (see zoom in of map). Further to this and as pointed out above, the Phase 1 site is already zoned MU1 and yet it appears to be shown as earmarked for green open space. This also contradicts the final BSDP which shows most of the area for both Phase 1 and 2 as "New Development Area". Not only is it our request that the Sub District 2 Spatial Plan be amended to correspond with the BSDP, but also that the existing rights on Phase 1 for commercial development be recognised and the SPC amended to "Existing Urban Development". It is also requested that the Spatial Plans be amended to more accurately reflect the outcome of the environmental specialist studies as undertaken on behalf of our client, so that the position of the floodplain and High Value Green Infrastructure areas are reflected more accurately	The maps have been updated for clarity. The NDA's have remained for consistency, as the site is shown as a NDA until such time that it is developed. The author was requested to provide the specialist studies for consideration to update the floodplain lines. This was not provided and thus the flood plains remain as per the draft. More detailed studies can still be considered in development processes.
B090e	Concern Regarding Implications "Generic GIN Mapping": The designation of large sections of areas within the urban edge and designated for urban development as "Critical Biodiversity Areas" (see pink areas below) is very concerning and is questioned as these areas have been identified as suitable for urban development for many years. How can it be that they are now suddenly determined to have "significant" environmental constraints? This coupled with the generic nature of the mapping (that we understand has not been ground truthed) and generic nature of the CPA guidelines as contained in Section 3.1.1 of Volume 2 of the BSDP, creates the impression that any new development in these areas is likely to be restricted – if not completely then at least subject to a large number of environmental constraints. Perhaps a rethink is required – if EMZ's are going to be used to underpin SPC's in our District Plans then surely a reasonable level of accuracy should be expected, as regardless of the qualification statements in Section 3 of the report, as they say "a picture paints a thousand words."	The referenced map is the Green Infrastructure and Biodiversity network. These areas have been shown as core biodiversity on the 2012 documents too. However, they are informants layers to the SDF, in which some core biodiversity (pink) areas are shown as 'New Development' areas. An 'areas of coincidence' hatch shows where there is an overlap between the two as that may impact development processes.
B091	Objection to urban densification of the Sunningdale, West Beach, Big Bay area, in particular the plans for high density development of Erf 1117 (Happy Valley) We do not support the amendment of the Urban Edge because: • We do not believe that the full implications of such amendment have been considered by the City. Surely the planning for infrastructure requirements has been sized to cater for the area within the current defined urban edge. • Effectively, allowing such amendment would imply that a future infrastructure shortfall to certain areas within the existing urban edge would be created. • We are not convinced that the effect of this expansion of the Urban Edge on all necessary infrastructure to the area has been considered in an integrated fashion. • Such amendment can create a precedent for further amendments to the Urban Edge in other areas without the necessary investigation of all planning and infrastructure issues. • The Urban Edge has only recently been defined and is based on considerable work, inputs and insights of many professionals at great expense to the City. Surely these inputs are worth something and should not be dismissed and changed so easily, without their express comments relating to the effects of such amendment. It is strongly recommended that new areas being developed be planned for densification and not existing well maintained suburbs where people have built up their dreams and homes. No need to destroy what is already there unless it is in a slum area that requires upgrading. We strongly object to Erf 1117 being developed as a high density area, this should be reversed to being a medium density middle income area in line with the surrounding areas.	See response to B016
B092	The position of Garden Cities is summarised as follows: - The City has deviated significantly from the previous planning documents that indicated potential future development opportunities along the north-western growth corridor. Based on the previous policy position, and implied and tacit indications from the City regarding the growth corridor, Garden Cities invested heavily in the area, both in land and infrastructure. - Much of the land that was earmarked as grey "Speculative" in the draft 2017 MSDF was indicated as "Critical Natural Asset" in the final published 2018 MSDF and current 2022 draft MSDF. They feel that this effectively sterilises their land holding for development and precludes long term land preparation. - That BioNet was indicated without the required detailed biodiversity assessment and specialist studies. - That by changing the designation of the land holdings to the east of BBNR, the City has effectively reneged on its commitments to garden Cities in terms of the agreement of sale for a portion of the BBNR (then the Blaauwberg Conservation Area). - It is requested that the land in question be designated 'Discouraged Growth Area' instead of Critical Natural Assets to be more enabling of land preparation processes to begin, such as EIAs. - That by changing the designation of the land holdings and contracting the urban development edge, the City has effectively reneged on its commitments in terms of the agreement of sale for Wolwerivier.	This is noted and has been referred for a direct response.

B093	Please find my objection to the urban development planned for high density development of ERF1117.(Happy Valley) I do not support the amendment of the Urban Edge because: • We do not believe that the full implications of such amendment have been considered by the City. Surely the planning for Infrastructure requirements has been sized to cater for the area within the current defined urban edge. • Effectively, allowing such amendment would imply that a future infrastructure shortfall to certain areas within the existing urban edge would be created. • We are not convinced that the effect of this expansion of the Urban Edge on all necessary infrastructure to the area has been considered in an integrated fashion. • Such amendment can create a precedent for further amendments to the Urban Edge in other areas without the necessary investigation of all planning and infrastructure issues. • The Urban Edge has only recently been defined and is based on considerable work, inputs and insights of many professionals at great expense to the City. Surely these inputs are worth something and should not be dismissed and changed so easily, without their express comments relating to the effects of such amendment. It is strongly recommended that new areas being developed be planned for densification and not existing well maintained suburbs where people have built up their dreams and homes. No need to destroy what is already there unless it is in a slum area that requires upgrading. We strongly object to ERF1117 being developed as a high density area, this should be reversed to being medium density middle income area in line with the surrounding areas. Please confirm you have received my objection and what is going to be done about the proposal.	See response to B016
B094	As home owner and resident of Sunningdale, Cape Farms, I strongly object to the densification of our area as per the proposed plans for ERF 1117. The negative impact it will have out ways the positive. The reasons are endless. However here are a few. • We do not believe that the full implications of such amendment have been considered by the City. Surely the planning for Infrastructure requirements has been sized to cater for the area within the current defined urban edge. • Effectively, allowing such amendment would imply that a future infrastructure shortfall to certain areas within the existing urban edge would be created. • We are not convinced that the effect of this expansion of the Urban Edge on all necessary infrastructure to the area has been considered in an integrated fashion. • Such amendment can create a precedent for further amendments to the Urban Edge in other areas without the necessary investigation of all planning and infrastructure issues. • The Urban Edge has only recently been defined and is based on considerable work, inputs and insights of many professionals at great expense to the City. Surely these inputs are worth something and should not be dismissed and changed so easily, without their express comments relating to the effects of such amendment. It is strongly recommended that new areas being developed be planned for densification and not existing well maintained suburbs where people have built up their dreams and homes. No need to destroy what is already there unless it is in a slum area that requires upgrading.	See response to B016
B095a	General and Volume 1 Baseline and Analysis Comment: 1) The draft document correctly draws attention to the threatened status of vegetation types in the sub districts some of which lies inside the proposed new urban edge. Unfortunately, the only option for the CCT within the urban edge has been to respond reactively when land owners and developers bring their greenfield development proposals to the table. Each development zone goes through the process of city environmental officials fighting for the preservation of pockets of threatened veld. The end result is always a greater percentage win for the developer in terms of the built environment. The expression "death by a thousand cuts" perfectly sums up the slow death of these threatened veld types. "Many small bad things happen, none of which are fatal in themselves, but which add up to a slow and painful demise"	Noted, the areas of coincidence on the SDF map attempts to highlight these areas upfront.
B095b	General and Volume 1 Baseline and Analysis Comment: 2. The CCT's Environmental Management Dept. has done an excellent job in recent years in expanding the BioNet network across the city. We also support the 10km buffer zone beyond the city in support of the environmental corridors & clusters. We call on the CCT to wholeheartedly support the proactive, incentive driven Stewardship Programmes and land acquisitions that seek to expand the Protected Areas and Corridors within and beyond the urban edge. Despite all the good work, the remaining remnants are still a small fraction of the original overall cover.	Noted, comment has been forwarded to the Environmental Management Department.
B095c	General and Volume 1 Baseline and Analysis Comment: 3. In response to the presented draft we specifically request that the already narrow ecological corridor between Morningstar and the Frankendale Industrial complex be widened. This is in light of the fact that the R300 extension will also use part of the same space in future. The transformative impact that roads have on the surrounding vegetation is well documented. Vehicles introduce seeds, often invasive weedy species. The residents of Morningstar living downwind of the colossal and ever expanding mountain of waste will need reprieve from the blowing sand and sound pollution. A healthy ecological corridor is required as a natural link between the Blaauwberg area and the Tygerberg Hills.	At this stage a development approval is already in place which has set the corridor width in the approval.
B095d	General and Volume 1 Baseline and Analysis Comment 4. The sand-mining threat - The sand that supports the Atlantis Sand Fynbos is particularly sought after by the building industry as it uses very little cement to form concrete and results in a significant cost saving to the developers. Sand mining is the largest extractive industry on the planet. Although sand mining is regulated in SA, both legal and illegal mining takes place at a cost to the environment. As the CCT continues to grow inwardly and outwardly, there will be increased pressure for additional mining. Eg. the sand mining within the Atlantis Industrial zone where Critically Endangered Atlantis Sand Fynbos is threatened. Remedial actions can never replace that which has been lost.	Noted, comment forwarded to EMD for visibility in environmental enforcement.

B095e	General and Volume 1 Baseline and Analysis Comment: 5. The threat of agricultural activities : a.) Overgrazing in the Mamre / Silwerstroom area. The sand that supports the Sand Fynbos is not suitable for livestock farming due to mineral deficiencies. In the past large herbivores would have moved through the area or been at very low levels. Due to a lack of slaughter facilities and other factors, significant overstocking occurs. Small holdings for agricultural purposes (livestock) are not sustainable in this poor soil type. b.) Legislation already exists to protect rivers from agriculture but the majority of fields abutting rivers preceded the legislation. We need to create / encourage zones along rivers eg. The Diep River that excludes livestock or that encourages a different land use right next to the river. Incentivised "hedgerows" of local indigenous shrubs to prevent erosion and to stop polluted water from reaching the river. This is a small local approach but the Diep River drainage basin is large, which is why we are mentioning it here.	As this issue merits consideration the comment is forwarded for to City's Stormwater management branch for consideration in future reviews of the City's Floodplain and River Corridor management policy and in their management approach. As legislation exists this is an operational and management issue with unique enforcement challenges beyond the scope of the District Plan process.
B095f	General and Volume 1 Baseline and Analysis Comment 6. Rapid and insensitive development as a threat. The EIA for the greater Sunningdale, Parklands and Sandown areas was done many years ago [approximately 1999], at a very large scale, when in fact it needed to have been done in much finer detail and should have included in-depth hydrological and geological surveys. As the alien vegetation is cleared in the Blaauwberg Nature Reserve (BBNR) we expect to see an increase in surface water running south. These would have fed the ephemeral pans to the south of the reserves. Historical maps of the area show streams running in a southerly direction from Blaauwberg (eastern side) before the widespread deliberate planting of Acacia. We wholeheartedly support the concept of corridors running south from the Blaauwberg Nature Reserve (BBNR) to join the Sandown Fynbos Corridor. We do however call for an additional corridor that links the BBNR to the Sunningdale Ephemeral Pan to ensure its long term survival and functionality. In the same vein we would also like to see the extension of biological corridors running north-south in Bloubergstrand.	These points were considered with EMD. In doing so we realised the GIN flexible corridors had not been visible on the SDF maps advertised. These are added on and already included a potential link as proposed. At the stage of a development proposal the necessary specialist studies can be considered, as per the green corridor guidelines. The Bloubergstrand corridor is shown with a green corridor and structuring open space. This is beyond the scope of the DSDF-EMF. Comment forwarded to EMD for consideration.
B095g	General and Volume 1 Baseline and Analysis Comment: 7. Infestation by invasive alien species - land transformation by wilful neglect by land owners & developers is "rezoning by neglect". Enforcement of regulations by the Green Scorpions is already happening but actually too late here at the Urban Edge. Areas of high biodiversity need appropriate buffers (not roads) to protect them from invasive grasses. For the economically important grass species (alien and invasive ones) there is no biocontrol available. Invasive grasses are particularly devastating around water bodies and vleis.	
B095h	General and Volume 1 Baseline and Analysis Comment: 8 - Dumping of various kinds, particularly building rubble also partly contributes to the degradation of the veld eg. Mamre commonage: There is a need for additional and accessible refuse / recycling points in smaller, isolated communities.	Comment forwarded to Waste Management.
B095i	General and Volume 1 Baseline and Analysis Comment: 9. Corridors & Rural Areas. "With regard to the remaining larger terrestrial mammals which still occur within the District, all are currently assigned the status of Least Concern. This indicates that the species are currently not threatened nationally, but on a local city or district scale the species may be very close to becoming locally extinct." This is also true of many common species of plants on the Cape Flats. " Their future survival in the district is dependent on there being larger natural open space to ensure that viable populations exist. The ecological corridors linking important natural areas are essential for the continued survival of many mammal species. Important ecological corridors within the Blaauwberg district are the corridor linking the Blaauwberg Conservation Area (BCA) to the Koeberg Nature Reserve, the Parklands Fynbos Corridor, and the corridor linking the Mamre Commonage to the coast. The agricultural areas to the north of the BCA are critical for fauna. To this end the agricultural areas to the north of the BCA are critical in ensuring that the BCA still remains viable for species with extensive home ranges or low densities within the CCT. These include the Aardvark (<i>Orycteropus afer</i>), Black-backed Jackal (<i>Canis mesomelas</i>) and Bat-eared Fox (<i>Otocyon megalotis</i>)." a) We support the call for ecological corridors linking important natural areas, and the importance of agricultural areas as part of roaming ranges for larger terrestrial mammals. b) No mention is made of the widely traveling otters [seen in the waterways of Sunningdale during lockdown in 2020, presumably having come from the Rietvlei area] and caracal within the urban edge - large ranges, low density.	Noted
B095j	General and Volume 1 Baseline and Analysis Comment: 10 "VEGETATION TYPE MAP TO BE INCLUDED" - this has not been included but is widely available online.	Noted, and included.
B095k	General and Volume 1 Baseline and Analysis Comment: 11. Page 37 No description of the Diep River Section is provided - portion of this site has been illegally occupied since the commencement of the Covid lockdowns, on land forming the river bank opposite the Doornbach and Dunoon areas and adjacent to the Malibongwe bridge over the Diep River.	Updated
B095l	General and Volume 1 Baseline and Analysis Comment: 12. Page 38 Incomplete description of the Melkbosstrand Conservation Corridor is provided. This must be detailed.	Updated
B095m	General and Volume 1 Baseline and Analysis Comment: 13. Page 40 Koeberg description is brief. It should be stated that the Risk factor is high on this site - the presence of high level toxic waste onsite that has never been removed. Low level waste is stored at Vaalputs but the high level toxic waste has never left the site and is being buried onsite.	Updated
B095n	General and Volume 1 Baseline and Analysis Comment: 14. Page 43/44 Given increased development, an increased surface area will no longer be available to allow for the natural soak-away of rainwater. In addition, rainfall intensity is set to increase with climate change. This could potentially result in flash flooding in lower lying areas. Some areas in Parklands & Sunningdale considered by residents to be Public Open Spaces are in fact zoned as Stormwater Retention Ponds. We call on the CCT to require or demand more of these spaces/ retention ponds in future developments. Superficially it appears as if the only outlet for stormwater from the Sunningdale area is into the canal that runs along the R27, into Rietvlei. The canal upstream from Link Road is already partially silted up, and the green space north of Link Road experiences significant flooding at times. All information is highly dated / old re: 3.1.4.3 Groundwater. This is important within the context of Day Zero in 2017/2018 and subsequent planning of water reserves	Comment forwarded to relevant departments. Also see Water Management and mitigation measures in Volume 4 Implementation plan for the area (Table 10.2.2.18)
B095o	General and Volume 1 Baseline and Analysis Comment: 15. The predicted impact of global warming, given the lack of climate action worldwide, will have a significant impact on this part of Cape Town. In addition it might be almost impossible to predict, wave impact, erosion levels and storm surges in the "new coastline" More importantly the changes will directly impact all sewage pumping stations (as most appear to be very low lying) and the Potsdam treatment plant itself	Some coastal impacts and other climate change issues have been highlighted in the district and sub district guidelines. Comment forwarded to Sanitation dept. for consideration in planning

B095p	General and Volume 1 Baseline and Analysis Comment: 16. Page 49 GREEN INFRASTRUCTURE MAP TO BE INCLUDED WHEN AVAILABLE – The availability of this plan to the public will be an important informant and should be provided asap. The report should be updated with it.	The map is in the document
B095q	General and Volume 1 Baseline and Analysis Comment: 17. "Development shouldn't occur where bulk infrastructure is stressed": a) In the early 1980's the new Potsdam Sewage Treatment plant was considered to be at the cutting edge of new technology. In the subsequent 40 years massive expansion has taken place locally but the plant capacity has not kept pace, with unfortunate consequences for many years now. b) Greenfield developments are still occurring in the greater Sunningdale, Sandown and Rivergate areas. On the other hand, densification occurring in the older, more established areas is not improving sewage treatment in the short to medium term either. c) The pumping stations only work when there is electricity. During load shedding all the sewage ends up in the Diep River. Even the small, "self-contained" sewage treatment plants [package plants] that small development clusters are touting, require electricity to function properly	The challenges are noted. Comment forwarded to relevant line department.
B095r	General and Volume 1 Baseline and Analysis Comment: 18. Page 188 Correction and completion of text required "Access to the waste facility by train has stopped due to the railway line being invaded by ." ??? informal housing	Comments noted and amendments to be made
B095s	General and Volume 1 Baseline and Analysis Comment: 19. It would appear that Chapter 13 has some incomplete sections on pages 186 to 191. For example: 13.3, 13.5 and 13.6. Nothing is mentioned about NMT on this page but it should be a recognized, important way of people getting about especially from a leisure perspective/scenic route/recreational opportunities as well general transport. As a reasonably flat district this makes cycling, scootering, walking, running etc. an important opportunity. It is noted that Section 6.3.1.4 briefly mentions it and Fig 6.3 is provided.	Comments noted and amendments to be made
B095t	Comment on DSDF Vol 2: (see full comment on PDF) - Notes that for most user of the document, sub-district guidelines are the most crucial part of the document. The lessons learned from the Potsdam WWTW "case" must be captured for future city planners. A moratorium on all new development that sends its sewage to Potsdam WWTW should be imposed until a realistic completion date of the upgrade to 100ML plant is realised. Page 81 quotes 2026, but this date has been moving in the last few years! It is noted that on the five maps for the five sub-districts the legends, icons, colours are inconsistent between the sub districts, incomplete, or incomprehensible, etc. This is very frustrating for a user. In the modern age of GIS and mapping there must be a better way to graphically portray the map with the descriptive table.	Thank you for highlighting the discrepancies. The maps and legends have ben updated to be more consistent. Individual sub-district maps differ as items which don't appear on each map are left off otherwise the legends grow too big.
B095u	Comment on Sub district 1 and Figure 15: (see pdf for imagery) What is this? (1 in red square) Is it an NDA? Why is a red block with number not in the legend? Why are there two shades of grey on the map but not in the legend? How do you figure out which circle is on the plan as the size of circle and dots don't clearly differentiate? What is the orange arrow indicating?	The numbers in red squares are the NDA's and are referred to in the corresponding table. It was feasible to include each one in the text and the team felt it was clear what they were once reading the guidelines. The dark grey is the development corridors, which is on the legend. The circles are references in the legend, it should be clearer now. The orange arrow was a mistake which has been removed
B095v	Comment on Sub district 3 and Figure 17: The legend doesn't include green hatching, white hatching in the extract below. Red block 4 should be indicated in the legend. Studies need to be undertaken to investigate and allocate a green corridor to link hydrological function and appropriate vegetated surface linkage from the ephemeral pan to the BBNR – roughly indicated in pink in the extract below. The purple circle shows the area of "mixed use intensification" that should NOT take place on the edge of the very sensitive and vulnerable Ephemeral Pan (the green area to the east of No 4. Extract from page 107: Passive trails within the fynbos corridor versus NMT routes and walkways external to the conservation area must be carefully analysed. In many cases it is better to keep the recreational activities external to the conservation area but with visual surveillance over the conservation area. Green lines and green dotted lines are not indicated on the legend. Examples appear in the extract below. It is assumed they might be open space linkages. The central dune ridge open space within Big Bay was required during the EIA and Planning approvals for Big Bay. This area must be indicated High Value Green Infrastructure. Linkages from the coast over erf 443 Bloubergstrand northwards to link with the BBNR must be provided. Green linkages on the east side of the Big Bay development should be implemented. NDA 5 includes an area that is supported for a LAPI - see comment under Vol 3. Greater research on, and detail of the ecological corridors must be investigated in this LAPI. The legend for metro and District development corridors presumably appears as "white" hatching over the plans. Having white hatching over areas along the route that are designated for High Value Green Infrastructure is misleading. How is the width of the corridor calculated? Why is the hatching along Blaauwberg Road wider than Sandown Road? Why would the development corridor south of Blaauwberg Rd reach the TBNR in places? It covers most of Flamingo Vlei. The interface with TBNR should be low density housing and limited intense mixed use. Point b in the table does not support/promote the width of hatching shown on the plan.	The legends and maps have been updated and most concerns addressed. The mixed use area was considered and removed opposite the ephemeral pan. The Fynbos corridor should have some form of public access in time. It is within an urban area and there are urban management considerations, such as ensuring it does not become a location of illegal dumping, or an unsafe area. Having the space used, and passive surveillance can assist. The corridor is also a natural asset to nearby residents as it is an opportunity to be in nature in an urban area. The high value green infrastructure designation is based on the BioNet. This input has been given to the team updating the Bionet in future. The corridors are not cadastral defined. A generic buffer of 400m was used on metro corridors and 200m on district level corridors.
B095w	Volume 3 Implementation Plan - Section 1.4 Local Area Planning Initiatives (LAPI) and Table 11 and Fig 9 It would have been useful to explain which action was being considered for each of the above 4 bulleted sites. However FoBCA is very supportive of a LAPI for the area in Table View/Bloubergstrand from approximately Sandown/Porterfield Road in the south, R27 in the east, coast on the west, and Blaauwberg Nature Reserve southern boundary (See below the red area to be studied in pdf). This LAPI would therefore include erf 1117. The environmental and heritage sensitivities, socio-economic opportunities and constraints, warrant a detailed plan for this area. It is understood that local residents and businesses could assist with funding for LAPI's. This opportunity should be explored in this important growth/conservation area. Documents missing: EG	Noted, Vol 3 has been updated. The community is initiating a Community Driven Planning Initiative for the Big bay - Bloubergstrand greater area, with support from the City.
B095x	Volume 3 Implementation Plan: Note missing link on Page 53	Updated.

B096a	Concerns Regarding the Capacity of Services Infrastructure to Accommodate Future Planned Development: Further Comment in Light of 2022 BSDF Proposals: The City's response is noted. Although (as far as we are aware) the Melkbos sewerage treatment plant has adequate capacity and many of the home owners at Atlantic Beach have the means (and already have) supplemented their electricity supply through solar power and inverter systems, our concerns in general regarding the ability of infrastructure to accommodate new growth in the Blaauwberg District remain.	Noted.
B096b	Implications for the Koeberg Nuclear Power Station (KNPS) Emergency Evacuation Plan: Further Comment in Light of 2022 BSDF Proposals: Perusal of Technical Appendix 14 does not seem to indicate that either Eskom or the NNR have formally commented on any documents formally circulated to them. This is concerning and may require intervention of a more direct/higher level in order to illicit comment. Reference is made to the following statement in Section 4.1.4(a) West Coast Area land use guidelines: Guidance in points b – d below will be superseded once the Regulations for Development around Koeberg are promulgated by the Minister of Mineral Resources and Energy and/or the review of Item 158 of the City of Cape Town's Development Management Scheme is approved by Council. Points b-d refer to the restrictions and evaluation process for new development within the 0-5km and 5-16km Koeberg Restriction zones. The concern here relates to the Minister of Mineral Resources and Energy replacing the standard provisions with new ones, without any form of public consultation on this matter (that we are aware of).	See response to B090a
B096c	Proposed Development of Melkbos CBD and Other Development Areas in Melkbosstrand: Further Comment in Light of 2022 BSDF Proposals: Updated guideline wording noted and appreciated. Erf 1117 -The City's response is noted and appreciated. However, the delays in the process are frustrating and the seeming general lack of communication as to project status with the community on this important matter is respectfully not acceptable. ABHOA will also seek to engage further with the Ward Councillor in this regard. Melkbos NDA: The clarity on the mapping is noted and appreciated and minor adjustments in the 2022 plan noted. The proposed urban edge for Melkbosstrand is also supported.	Comment and frustration is noted. Engagement with the ward councillors supported to assist engaging the relevant project managers.
B096d	Development Status of Erf 1117 Blaauwberg: The adjustments to the mapping are noted and welcomed, particularly those that incorporate the northern part of Erf 1117 into the Blaauwberg Nature Reserve. ABHOA understands that there is now a general consensus between the City and the local Big Bay community as to the need for an LASDF for the area that encompasses Erf 1117. It is also understood that there is broad consensus that this would need be a community driven initiative and the City has confirmed that there is a protocol in place for a Community Driven LASDF Planning Initiative (CDPI) that can be followed in this instance. It is also understood that preliminary work on the LASDF has commenced. This is welcomed and considered a positive step forward by ABHOA in bringing greater certainty to the development of this large piece of land. ABHOA would like to be registered as Interested and Affected Party for the LASDF process, once it gets underway.	The community is initiating a Community -driven planning initiative with City support.
B096e	The Need for Further Local Area Planning in Melkbosstrand: 2021 Comment: As already noted, the draft 2021 BSDF states that further commercial development should be accommodated in inter alia the following areas in Melkbosstrand: • 6th avenue • 11th avenue • Beachfront from 6th avenue to 11th avenue The 1998 Melkbos CBD Development Framework does make some references to land use guidelines for 6th Avenue and the 6th Avenue/Otto Du Plessis/Birkenhead node. Further to to this, the writer is aware of a draft urban design framework being contemplated by the City in the early 2000's to manage future development along the beachfront between 5th and 11th Avenues, but this was never taken further. The City is thus requested to proceed as soon as possible with further local area planning processes, as provided for in terms of Section 12 of the Municipal Planning By Law, in order to appropriately guide and manage this future commercial development (we assume this includes tourist related development and possibly higher density residential development) as proposed in the draft BSDP. City's Response: The City does not seemed to have responded directly to this comment. Further Comment in Light of 2022 BSDF Proposals: Our 2021 comment is reiterated.	Your comment is noted. The Planning department has considered the LSDF proposal, and considering other areas in need of local planning and the availability of resources, has not prioritised Melkbos LSDF. The local area planning priorities are detailed in Volume 3: Implementation Plan. It is intended I review these regularly. The Melkbos request will be considered in that process. The author is requested to provide the draft documents referred to the Spatial Planning team.

B097	As a family within the Sunningdale district we do not support the amendment of the Urban Edge because: • the full implications of such amendment have NOT been properly considered by the City. It is very visible that Infrastructure requirements has been sized to cater for the area within the current defined urban edge. • The effect of this expansion of the Urban Edge on all necessary infrastructure to the area has not been considered in an integrated fashion. • Effectively, allowing such amendment would imply that a future infrastructure shortfall to certain areas within the existing urban edge would be created. • Such amendment can create a precedent for further amendments to the Urban Edge in other areas without the necessary investigation of all planning and infrastructure challenges. • The Urban Edge has only recently been defined and is based on considerable work, inputs and insights of many professionals at great expense to the City. Surely these inputs are worth something and should not be dismissed and changed so easily, without their express comments relating to the effects of such amendment. It is strongly recommended that new areas being developed be planned for densification and not existing well maintained suburbs where people have built up their existing homes. The area doesn't not require this. It is a strong working community that just works. We pay privately to HOA's to maintain our piece of mind and security but as we know they are only capable within the resources provided to them. I appeal to you to keep this community as is and intact. It works. We have finally found a community where my 4 year old is able to play with other community kids in the streets safely without worry. The is my formal written objection to your proposal for densification to our area. Lets keep what works without changing the demographics to this community abound by the proposal of densification. Lets get back to the drawing board and see what other alternatives there are to helping others.	See response to B016
B098	See B086	Please see response to B086
B099a	See PDF Document for imagery - Focus on Erf 1117 Bloubergstrand to R27 Road Valuable water source under the coastal section through to Erf 1117, which feeds surface and underground streams through Bloubergsands, to traditional wetlands feeding Rietvlei With reference to Vol.1: Baseline and Analysis Report - GEOLOGY: Refer Map P30 Although I am NOT a Geologists nor Hydrologist, I suspect that the SILCRETE rock layer extends inland and reappears at Frankdale. Blaauwberg Nature Reserve, Blaauwberg Farm on the east of the map section. The Limestone and Calcrete is also much more extensive than shown. Water sourced from above the SILCRETE layer is clean having been "filter" and settled on impervious rock. Environmental Impact assessment: Attention must be given to a thorough E.I.A. on the whole of the Erf 1117 to include Geology at depth to establish location of the Silcrete Aquifer and to ensure it is not impacted by development actions on the overlay levels.	The underlying geology in the baseline report was originally derived from the Council for GeoScience. When the EIA process arises EMD could request the Geology specialist's Terms of Reference to extend the scope of works in order to verify the location of the geology (if needed). The comment has been forwarded to Bulk Water re the aquifers.
B099b	See PDF Document for imagery - Focus on Erf 1117 Bloubergstrand to R27 Road - "Brink"Topographic map of early 1900's Section used to illustrate the know Water sources. Circles indicate known water sources along the coast from Bloubergstrand to Melkbosstrand Only Meybooms Dam is currently identified and located within the Blaauwberg Nature Reserve on the Coastal Dune Hiking trail. Under a large Milkwood tree almost 2km on the trail. This section is used to illustrate relative position of Companies Dam within the area adjacent to current R27 West Coast Road on Erf 1117. Cross reference to attached file "Companies Dam Lot La1.pdf". Heritage Impact assessment: Location of the Companies Dam which was covered in drifting sands by early 1900. Reference possibly in Afrikaans book, translated to mean "Twilight in the Tygerberg" – text and photos.	The City Environmental & Heritage Management branch is aware of the Compagnies Dam historic information. In the event of further development of Erf 1117 (and the subsequent EIAs/HIAs being required during the formal processes) more detailed studies in this regard could be requested (if necessary) at that time.
B099c	See PDF Document for imagery -- HYDROLOGY: Refer Map P46 This map MAY or MAY NOT have known water sources indicated in Dark and Light Blue?	Comment forwarded to Environmental department.
B099d	See PDF Document for imagery - HIGH VALUE GREEN INFRASTRUCTURE Conservation of Cape Flats Dune Strandveld and the Coastal Dune system – Erf 1117. See GIN map page 56 reference. USING the section from Blaauwberg_DSDF_Subdistrict 3 map - COMPARE the location of BLOCK 5 to the previous map the area is identified as CRITICAL BIODIVERSITY AREA (Core 1: C8A 1a – C8A 2) Recommend that the entire section north of the current Big Bay Boulevard and new Interchange be retained as GREEN – High Value Green Infrastructure. The areas shown south of Big Bay Boulevard in YELLOW must include retention of the Dune Ridge corridors with links to the M19 / Sir David Baird Rd. Green Corridors	These points were considered with EMD. In doing so we realised the GIN flexible corridors had not been visible on the SDF maps advertised. These are added on. The northern portion of Erf 1117 is shown as an area of coincidence (between proposed development and existing core biodiversity). The Bloubergstrand corridor is shown with a green corridor and structuring open space. Mr Fuller-Gee's suggestion to extend the green corridors all the way to the south is not a Biodiversity Management Branch priority/necessity. There is already a green corridor to the west (the Big Bay Dune Network) managed by Recreations & Parks. Due to the existing Big Bay Boulevard (east-west) effectively cutting of the corridor there will be no incentive from an operational perspective for BMB to manage such an additional corridor.

B100	We have limited our comments to the DSDF and more specifically only the portion of this covering the Milnerton Central area. Our comments are as follows: 1. We would like more prominence / importance to be given to the fact that Otto Du Plessis and Marine Drive are Scenic Drives and therefore request that future development / densification to the west (seaward side) of this road be limited to a maximum three storeys in height so as to limit the obstruction of views toward the city and table mountain. 2. The Scenic Drive Policy dated 2003 needs updating to be more prescriptive and clear with regards to the protection of scenic views from Otto Du Plessis and Marine Drive. 3. The diagram below extracted from the "Milnerton South – Paarden Eiland Local Area Spatial Development Framework Conceptual Development Framework Visioning Document" dated 2015 shows the Esplanade area as being a proposed area of residential densification (item 5). We are not sure why this particular area has been identified for densification as opposed to the area to the west of Marine Drive which we believe to be more appropriate. Again as mentioned in point 1 above we would like to limit the height of any densification to 3 storeys in this area. 4. There are some aspects of the "Urban Design Framework for Loxton Road" dated 2002 which we believe still have some relevance for the future development of the Milnerton Lighthouse Precinct area and the Unitas Park Precinct. We believe that despite being fairly dated, it should not be discarded in its entirety as proposed in the DSDF. 5. The higher densification planned along the western edge of Koeberg Road between Loxton and Racecourse Roads will require direct access off Koeberg Road to the parallel service road to be attractive for developers. This service road is currently only accessed from within the Milnerton residential area. Closure of some of the side streets off this service road should be investigated to prevent rat-runs and to limit traffic impact to the residential suburb of Milnerton from this service road once direct access to Koeberg road has occurred. Possibly as indicated in the image below. 6. The areas highlighted on the map below in pink are areas which we believe to be suitable for medium to high levels of densification and these areas appear to broadly align with the proposed DSDF. Thanks very much for the opportunity to comment and thanks again for your engagement sessions with the MCRA and community.	Thank you for the detailed feedback. 1. This level of detail would be amiss in the District Plan, given the detail in the Milnerton South – Paarden Eiland north LSDF. However, guidelines regarding scenic views have been added to the sub district guideline to guide consideration and decision making in new development. 2. This has been referred to the team responsible for the policy. 3. Noted, the local SDF remains an approved policy. However, further engagement with the branch is welcome to understand the position better and inform contextual application of the policy. 4. Noted, the policy has been retained and indicated for review in the long-term. 5. This is useful input. The Koeberg Road Management Strategy is indicated for review in the medium term and this could be best considered in that process. 6. Thank you for the input.
B101a	Implications of Future of Koeberg Nuclear Power Station for the BSDF: Clarity is required as to the ultimate life span of the KNPS, as it is understood that the NNR has not yet agreed to the application by Eskom that its lifespan be extended. This is important as the development restrictions (or ultimate lack thereof if the KNPS is decommissioned), will have a marked impact on development in the Blaauwberg District. Perusal of Technical Appendix 14 does not seem to indicate that either Eskom or the NNR have formally commented on any documents formally circulated to them with regards to the KNPS. This is concerning and may require intervention of a more direct/higher level in order to illicit comment. Reference is made to the following statement in Section 4.1.4(a) West Coast Area land use guidelines: Guidance in points b – d below will be superseded once the Regulations for Development around Koeberg are promulgated by the Minister of Mineral Resources and Energy and/or the review of Item 158 of the City of Cape Town's Development Management Scheme is approved by Council. Points b-d refer to the restrictions and evaluation process for new development within the 0-5km and 5-16km Koeberg Restriction zones. The concern here relates to the Minister of Mineral Resources and Energy replacing the standard provisions with new ones, without any form of public consultation on this matter (that we are aware of).	The impact of the Koeberg & Associated Emergency Planning Zones have been thoroughly considered in the District Plan. The National Nuclear Regulator and Eskom are part of intergovernmental committees which are notified of draft documents and sign off on the MSDF. The guidelines in the DSDF have been tweaked to refer to a review rather than supersede. For interest, the process to gazette regulations would require advertising for comment.
B101b	Implications of Potsdam Treatment Works Capacity Constraints on Vision of BSDF: We are extremely concerned with regards to the disclosure by the City last year of significant capacity constraints in relation to the Potsdam sewerage treatment works that serves most of the Blaauwberg District Area. The City has already placed a moratorium on planning approvals for developments of more than 10 residential units etc. unless temporary treatment package plants are provided. We also have it on good authority that the Potsdam upgrade project is falling behind schedule and that the required upgrade of the treatment works may only be completed in 2027 by which time the DSDF will probably be up for review! Taking the above into account as well as constraints with Eskom related electricity supply, the City is urged to urgently investigate, propose and actively facilitate appropriate and sustainable off-grid infrastructure solutions of a permanent nature, failing which the entire development and densification vision of the 2022 BSDF will be largely unworkable	The comment is noted and the issue of infrastructure capacity remains a concern. The infrastructure sector plans detail line departments' plans to address capacity issues. The DSDF proposal contains our best attempt to stop these issues getting worse in the future from a spatial planning perspective.

B101c	Reference is made to our comment on the draft 2022 MSDF to the general faltering of the Urban Inner Core densification and prioritisation of infrastructure rationale due to the lack of progress in the provision of the required supportive infrastructure. In addition to this there is a serious shortage of affordable housing in the Blaauwberg District and the result has been a significant growth in informal housing and land invasions in last few years (in fact notably since the baseline study's 2018 figures). Following the 2020 land invasions in the Welbeloond area, there are now a significant number of informal shack dwellings located underneath the powerlines and within in the Diep River floodplain. The negative environmental, health and safety implications of this are self-evident, but of particular serious concern is the environmental and public health impact on the entire downstream Diep River wetland system. The Blaauwberg District has one of the few viable opportunities for new greenfield development in the City, namely so-called Parklands Main Road growth corridor. Not only has the idea of a West Coast growth corridor formed part of formal City Policy for the area, since the 1981 Guide Plan, which over the years (and for very good reason) later evolved into the Parklands Main Road growth corridor, but decades of research, specialist studies and successive spatial planning policies have continued to bear up the inherent logic of a growth corridor near the N7 and along the Atlantis goods railway line, heading towards and possibly ultimately linking up with Atlantis. In fact the design of Parklands Main Road, the M12 extensions etc. have all been done with this in mind. However, the promotion of this growth corridor has in the writer's view started to take a less prominent role in terms of the City Spatial planning thinking following the emergence of the 2018 MSDF and its emphasis on inward focused infrastructure investment driven densification – the so-called “Urban Inner Core”. Whilst the inward focus approach in 2018 has a very strong inherent planning logic and was (and still is) supported by SAACPP, it is argued that the development context has materially changed in the past 4 years on the basis of: Firstly, the lack of infrastructure investment in the Urban Inner Core, has jeopardized the premise that the Urban Inner Core densification focus is the only to the City's housing and development needs. This is particularly true in the case in the Blaauwberg District where Potsdam capacity constraints have effectively put large scale development on hold for the next 5 years. It is argued that it is time for the City to have an urgent rethink as to the role the Parklands Main/Koeberg development growth corridor needs to play in addressing pressing development and housing shortages in the Blaauwberg area. The detailed planning for this corridor has a strong foundation and further to this, large scale developers have land banked significant parcels of land along this corridor. It is argued that it is time for the City to realise that it can make considerable progress in achieving the large scale affordable housing provision that is so desperately needed by partnering with these large scale developers, namely Garden Cities, Communicare and Milnerton Estates. These developers possess the track record, means, expertise and economies of scale to rapidly roll out large scale affordable housing projects underpinned by off-grid infrastructure solutions.	Thank you for the detailed input. Please see B088 for a response regarding the contraction of the northern growth corridor since 2012. The 'New Development Areas' in the District Plan are identified for accommodating the future residential and commercial needs of the district.
B101d	Comments Relating to the Proposed Koeberg Road Corridor North of Malibongwe Drive: Notwithstanding the comments in paragraph 3.3 above, it would be rightly pointed out that the 2022 BSDF does in fact make provision for a northern growth corridor – the so-called Koeberg. The Need to Urgently Revive and Extend the So-called Parklands Main Road/Koeberg Road Development Corridor Road Corridor. This is acknowledged and appreciated. The corridor however only extends up to the south of the Morningstar smallholding area, and also does not incorporate land along Koeberg Road and Parklands Main Road extensions that does not form part of the Blaauwberg Nature Reserve. Our argument is thus that given the magnitude of the housing shortage, the new growth corridor would not be big enough to accommodate the housing demand over the next 5-10 years. The further statements are submitted in further support of the argument that the new development corridor North of Malibongwe Drive as proposed in the BSDF needs to be expanded: • Only a relatively small area of the corridor is earmarked for new residential development (medium density). The rest of the corridor comprises the land fill site, industrial uses and two mixed use intensification areas (the latter could accommodate some affordable housing, but other land uses will most likely take precedence); • The amount of new housing provided for the in the BSDP vs. the actual housing shortage has not yet been fully quantified/updated to reflect the current situation in 2022 (A detail density and unit number assessment is required); • Further development around the future Parklands Main Road and Koeberg Road extension routes is in our view possible and would be well integrated via these routes into development to the south; • Significant parcels of land owned by Garden Cities and Communicare (both with a track record for large scale affordable housing) exist just to the north of the Morningstar smallholding area. See image attached in comment	Noted, please see B088 for a response regarding the contraction of the northern growth corridor since 2012
B101e	Graphic Depiction of SPC Categories: The Metro/District Development Route hatching on the Sub District spatial plans tends to obscure the colour of the SPC categories and make it difficult to assess which SPC actually applies	The maps have been updated for clarity.
B101d	Concern Regarding Implications “Generic GIN Mapping”: The designation of large sections of areas within the urban edge and designated for urban development as “Critical Biodiversity Areas” (see pink areas below) is very concerning and is questioned as these areas have been identified as suitable for urban development for many years. How can it be that they are now suddenly determined to have “significant” environmental constraints? This coupled with the generic nature of the mapping (that we understand has not been ground truthed) and generic nature of the CPA guidelines as contained in Section 3.1.1 of Volume 2 of the BSDF, creates the impression that any new development in these areas is likely to be restricted – if not completely then at least subject to a large number of environmental constraints. Perhaps a rethink is required – if EMZ's are going to be used to underpin SPC's in our District Plans then surely a reasonable level of accuracy should be expected, as regardless of the qualification statements in Section 3 of the report, as they say “a picture paints a thousand words.”	The referenced map is the Green Infrastructure and Biodiversity network. These areas have been shown as core biodiversity on the 2012 documents too. However, they are informants layers to the SDF, in which some core biodiversity (pink) areas are shown as 'New Development' areas. An 'areas of coincidence' hatch shows where there is an overlap between the two as that may impact development processes.
B101e	Development of Erf 1694 Melkbosstrand: The City is urged to proceed with the associated statutory applications to provide certainty as to its development intentions for this strategic piece of City owned land as soon as possible	Comment forwarded to the project manager.
B101f	Development of Erf 1117 Big Bay: The City is urged to lend its full support to the Community Driven LASDF process currently being contemplated in order to bring certainty as to future development of this large piece of state land as soon as possible.	The City is supporting this process.

B101g	Atlantis south intensification area: Cognisance of the recently approved Mine on Portions 4 and 5 of Farm 32. This is a long term and extensive sand mining operation that arguably should be reflected as such on the Sub-District 5 Spatial Plan (the entire area including the WWTW is denoted as "Structuring Open Spaces". The extension of what seems to be Parklands Main Road to the east of this mining area and through Farm 1394 is noted with interest, given that development rights for 18Ha industrial development is already approved in the north western corner of this erf (along with road alignment and proposed intersection with Blombosch Road and Witsand).	Noted, mining rights are not shown on the map. This is an aspect for improvement in future. The proposed roads are from the Public Right of Way (PROW, 2017) which shows a potential road network. This layer has been used throughout the District Plan and is not definitive. The 2017 PROW was completed based on a previous spatial development scenario for the district. The PROW is currently being reviewed. The precise location of roads is subject to development proposals and more detailed contextual investigations at the times the road links are required.
B101h	Blaauwberg Road Corridor and Sub-district 3: The Guidelines for Sub-District 3 under Section 4.1.3 of Volume 2 (Technical Report) are broadly supported. In particular the statements made with regards to the Blaauwberg Road TOD Corridor in terms of height and land use mix are welcomed. Serious consideration should be given to extending Bayside Mixed Use Intensification Node to include the properties up to Donkin Road in order to permit higher density residential development. The following comment is offered on Section 4.1.3(g) – Spatial Objectives for Sub-District 3: Promote east-west NMT routes between the Table View beachfront and residential areas both sides of the R27. The proposed connector between West Beach and Blouberg Extension 1 is not supported as this will result in additional peak beachfront traffic using this as a short cut through route (between Otto Du Plessis and the R27 and beyond). This will negatively impact on the residential areas of West Beach/Bloubergsands and Blouberg Ext.1 and associated streets which are simply not designed to cater for this type of traffic. The additional connector between Otto Du Plessis and Big Bay Boulevard is however logical, will also service the future development on Erf 1117 and should also alleviate the pressure on Big Bay Boulevard West and Comorant Avenue to accommodate peak beachfront traffic between Otto Du Plessis and the R27. The road widening upgrades around the R27/Big Bay Boulevard/Berkshire Boulevard intersection, along with (we hope to see sooner rather than later) the full dualling of associated extension of the R27 MyCiTi trunk route R27 between Sandown and Berkshire with additional stations at the Tryall and Berkshire intersections, will help in this regard.	Noted, the Blaauwberg Road guidelines have been altered so as not to be too prescriptive, as the Blaauwberg Road Management Strategy is scheduled for review in the short term. The inputs regarding the roads are noted and can be considered in the Community initiated local SDF for the area. Please also consider the response above regarding the PROW as indicative not definitive.
B102	See B011	See B011
B103	See B011	See B011
B104	See B011	See B011
B105	See B011	See B011
B106	See B011	See B011
B107	I am a property owner in the Sunningdale area, and would like to lodge my objections to the Cape Town City Council's proposal to develop low cost housing on this site. Over ten years ago when one or two families decided to squat on this land, the Cape Town City Council simply refused to remove these people or to deal with the issue at that stage. There have been several complaints and petitions drawn up and submitted from local residents and the ratepayers association over the years, and in true City of Cape Town style, just REFUSED to deal with it, always finding some excuse as to why? We rate payers were told that this land is national government land, and not local government land, now all of a sudden part of this land does belong to the local government?? Now years later, this squatter camp has grown, bringing crime and filth to the area. These people DO NOT want to work, they prefer to beg and steal, and scratch in refuse bins. The City Council has done nothing to prevent this or clean up the area in Happy Valley. There are no bins, no sewerage facilities and the filth and crime has escalated. Low cost housing at the expense of local rate payer's is NOT the answer as the average household in the greater Table View / Blouberg area is already struggling with rising costs, one of them being the increased costs of RATES by the City Council. The City Council is of the opinion that the White population must always JUST PAY and support the rest of Africa? There is NO industry in the area for work? There are no schools in the area for these people, who cannot afford private schooling There are no Health care facilities in the area for these low cost families There is no rail transport facilities to Cape Town The My City Bus is not affordable for these low cost people Happy Valley will turn into another filthy squatter camp just like JOE SLOVO and DU NOON? These areas are proof? We ratepayers are expected to submit building plans at a cost and have them approved, yet in the low cost housing areas, it is a free for all. Any building can take place without plans, shacks get added on to properties, and they get away with it? Unfortunately these people do not know how to live and maintain a clean environment and the above two low cost housing areas are proof of this? They continue to want everything for FREE and because they do not pay for anything just do not care about anything?	The objection is noted, however the ERF is identified as a new development area and an area of densification to cater for the growing housing demands of the city. The housing will be of a mixed nature and the development is proposed with a variety of land uses. The provision of low cost housing is critical as it deals with the housing issues and informality faced by the city and is therefore an important strategic thrust of the city as outlined in the principles of the City's IDP.
B109	See B011	See B011
B110	See B011	See B011

B112	I hereby offer comments of objection as follows: 1. Melkbos sewerage is experiencing problems of over spilling and not coping with the load as it is now. 2. Water pipes are breaking constantly. It seems the area is not able to provide more supply due to the pressure requirements related to higher flow rates. 3. Koeberg emergency plan might be jeopardised by the higher population numbers and evacuation being limited by insufficient road network. 4. The traffic infrastructure is limited as it is, with difficulties at the high school and high density on the R27 and N7 link. 5. Melkbos infrastructure itself is insufficient to support an extended population in terms shopping facilities and schooling. These issues would have to be addressed before implementation of the intended developments	The comment is noted and the issue of infrastructure capacity remains noted as a concern. The DSDF has engaged with these issues related to public amenities. The various line and service department sector plans highlight these issues and explain the plans they have in addressing shortfalls and capacity issues. The DSDF proposal contains our best attempt to stop these issues getting worse in the future, and hopefully address some of them through planning future development.
B113	See B011	See B011
B114	See B011	See B011
B115	See B011	See B011
B116	See B011	See B011
B117	See B011	See B011
B120a	Blaauwberg DSDF: Page 67: Koeberg Power Station - It is important to cross-reference reference the work of the EPSOC Committee, the Transport Evacuation Model (TEM) and the Emergency Evacuation Zones in this spatial context. Should ideally cross reference this section to page 76, section 6.2.1.3.	Considered, the TEM is cross-referenced. The EPSOC considers more operational issues too and was decided not to include reference here. The guidelines have been updated since the draft but remain as concise as possible.
B120b	Blaauwberg DSDF Section 6: The importance of public transport mobility and accessibility networks to be considered in terms of its importance in reducing vehicle emissions to the environment. For consideration in respect of air pollution	Comment noted.
B120c	Blaauwberg DSDF Section 7 - This section is lacking a very important ecological infrastructure, viz. Air Quality. It is recommended that the City does air dispersion modelling of the criteria air pollutants in the metropolitan area, to inform spatial planning & land use management when proposing new development (e.g. housing, industrial, etc.). Taking potential air emission sources into consideration in an area (e.g. NEM:AQASection 21 Listed Activities), the dispersion model outputs provide an indication of modelled pollutant concentrations at selected downwind receptor locations; eg. if modelled air pollutant concentrations are high, then due consideration must be given in respect of spatial planning for any proposed housing developments. The City has a database of all Section 21 Listed Activities to support such modelling. The City's database of air quality complaints inclusive of noise, dust and odour is also a resource for this kind of intelligence to support decision-making	Noted and referred to relevant department for future consideration outside this process
B120d	The scale of the geology map of Blaauwberg district is undefined.	Noted. This was not updated.
B120e	Blaauwberg District Implementation Plan Page 21 - Table 8: Pipeline Projects in the Blaauwberg District. All proposed health facilities are included, except for the proposed Protea Park CDC, which was included in the previous draft, but is now excluded from the May 2022 document). The Protea Park CDC -CoCT Clinic Replacement project is planned for the Medium-term, with practical completion envisaged by March 2029.	Noted and Implementation Plan updated with supplied information - thank you
B121a	TR 77 Section 1 (R27 between Tryall and Berkshire) is currently in the process of being upgraded to a municipal standard by the City. Due to the road condition at completion of the upgrade and as part of ongoing devolution process, it is suggested that the city accept transfer of this road as authority.	Comment forwarded to relevant department.
B121b	As an affected stakeholder, the DTPW Roads Branch will need to be consulted in connection with any work on the potential R300 alignment.	Comment forwarded to relevant department.
B121c	It is noted that Figure 3 indicates the realignment of OP111 (Vissershok Road). The DTPW Roads Branch needs to be consulted as the relevant Road Authority in connection with any impact regarding this road.	Comment forwarded to relevant department.
B121d	Further discussion with DTPW Roads Branch is necessary regarding extension of the M12 to Berkshire. The possible extension of the M12 to Momingstar should be considered in conjunction with the extension to Berkshire.	Comment forwarded to relevant department. This may warrant further discussion on the extent of urban development planned for.
B121e	WCG is currently the Road Authority of all main roads in Atlantis. The City has indicated that authority-ship over these roads shall not be considered as part of the ongoing road devolution process. As a result of the CBD expansion, suggestion would be that the CoCT accept road authority-ship.	Comment forwarded to relevant department.
B121f	The DTPW recently approved a proclamation for the closure of the portions of Minor roads 61 & 62 which traverse Cape Farm 1 Groote Springfontein conditional to the approval of a development applicant for the farm. Both the DSDF (Oct 2021) and the recent MSDF omitted the 2 development nodes at Springfontein farm (despite inclusion in the 2017 documents) which compromises the development application. The DTPW and DEADP's Coastal Management Branch supports a limited footprint for the development to fund improved Coast Access as envisaged in section 18(9) of the Integrated Coastal Management Act. DTPW have received and endorsed comments from the Springfontein owners re the concept of an eco-village and walkway access linking the Development with Silverstroom resort in future (Aug 15th 2022). It is therefore recommended that these development nodes be included in some form in the DSDF as in the 2017 document.	Noted, see B076
B122	Melkbos sewerage is experiencing problems of over spilling and not coping with the load as it is now. Water pipes are breaking constantly. It seems the area is not able to provide more supply due to the pressure requirements related to higher flow rates. Koeberg emergency plan might be jeopardised by the higher population numbers and evacuation being limited by insufficient road network. The traffic infrastructure is limited as it is, with difficulties at the high school and high density on the R27 and N7 link. Melkbos infrastructure itself is insufficient to support an extended population in terms shopping facilities and schooling. These issues would have to be addressed before implementation of the intended developments.	Comment and concerns are noted. The DSDF proposal contains our best attempt to stop these issues getting worse in the future, and hopefully address some of them through planning future development. The Implementation Plan: Vol 4 includes the major projects required to support development in line with the DSDF.

B123	On review the Draft District Plan for the Milnerton Racecourse appears to take the current racing facilities and associated infrastructure into account and the designations are flexible enough to accommodate any future interventions that may be required to secure the long-term sustainability of the horse racing industry	Noted.
B124	LACK OF SIDEWALKS in greenfield developemnt eg. Sunningdale makes it difficult or dangerous to walk to the park. This is not excusable in 2022, given the SDF and UN Sustainability goals for City's. Sidewalks are an essential component people need to use daily to get to their jobs.	This has been forwarded to the Urban mobility department and local transport planners
	BUS STOPS block the road when there are no embayments, they cause traffic to back up behind them. Please provide adequate side lines/ embayments.	This has been forwarded to the Urban mobility department and local transport planners
	There is not enough PARKING space for visitors in these areas. We have to park in someone elses corner houses, there is not enough spaces in some areas for people to visit!!	Noted.
	ELECTRICITY BOXES are placed in dangerous areas, near people's drive ways where they are easy to hit. Placement should be considered.	This has been forwarded to the Electricity department
	Instead of trying to bring people to the city, which the city is quiet FULL, they should invest in providing JOB CREATION in the marginal areas, the CoCT is trying to invest millions in a city bus to bring people to the wealthy neighbourhoods!! that is the BIGGEST mistake one can make at this point, because now you are FORCING people to go to the city to BEG on the streets!! instead of to BUILDING a Sustainable environment for them.	The SDF supports providing a range of options for people.. This includes improving transport options that are safe, reliable and affordable as well as economic development in marginalised areas, and affordable housing in well located areas.
	For Example: If in kaylitcha there is a huge problem with crime, now you want them to travel to bring more crime to the City!! the city MUST invest in their education, helping to provide land where they can learn to grow their own grains, and build to WORK, they must know that they are an important part of our society they do PAY TAXES with every bag of chips and coke they buy! They must be taught to be PRODUCTIVE CITIZENS! not to force them to become the 4th WORLD!!! haven't you seen INDIA?? MEXICO?? how this kind of mentality DOES NOT WORK!! If we invest in EDUCATION for our people and teach them to be productive citizens, Kaylitcha would be an amazing Place!! I have worked there with NGO's and people is doing great things there, but is NOT a solution to invest all that money in a BUS LANE that will just force them to pay to be able to access education and health benefits Where are the good hospitals and nice malls for them??where are their nice football fields? where are their welcoming libraries and cultural centers? they must have to go all the way to the city to enjoy that? I was told they destroy everything when it is given, and how hard is to provide stuff, but that is WHY we need to EDUCATE us!! if they understand that they are PAYING for those things even with their minimum TAXES they will OWN their things,	Some of these issues/suggestions are beyond the scope of spatial planning and what can be addressed in an SDF. The SDF identifies areas for civic clusters, including clinics, libraries etc. to support an equitable distribution of facilities for all areas.
	If there is JOB CREATION they would like their own HOMES!! I live outside of the City, and I'm happy where i am, why are they not allowed to be happy in their environment??? why do we have to FORCE them to be UNHAPPY and tell them that the solution is to go to the CITY? why not create the best environment in which they are happy and PROUD of their town??	The SDF supports mixed use development so that opportunities for work, recreation etc. can be closer to where people live. However, people do still need to travel and so encouraging a functional transport system is also supported too.
	If there are things TO DO, people will focus more in working than in CRIME, if kids get beautiful safe spaces to play they will not vandalize, if teenagers get opportunities to learn and become useful citizens, they will not need to move into crime! But if we invest all that money just in a bus line to get them to the city, AT this POINT is a real PROBLEM! as it is happening in my OWN town!!	The SDF supports mixed use development so that opportunities for work, recreation etc. can be closer to where people live. However, people do still need to travel and so encouraging a functional transport system is also supported too.
	The amount of BEGGERS is getting very bad, the amount of people in the streets is very bad, JOB opportunities???? WHERE?? they are in the streets on a daily basis BEGGING!! because they make more money by doing that!! Is a huge market!! I come originally from MEXICO and you do not have any idea of what is coming if this is allowed, I invite you to visit my country or INDIA and you will see what is coming to your country if they do not do things at the right timing and considering how important is to FIRST EDUCATE our society then UNITE! It is important to UNITE but we must have the basics of education first!! we have now people literally PEEING in our mall entrance, right on the sidewalk of our mall!! That is what INDIA has! pee everywhere, and now right here on my own street!! If we just use basic education!! that when you are on the city, there are public toilets, or an emergency go at least to the grass on the tree!! BUT please we need BASIC education before INDIA arrives (i lived all over India for a month) and i wish some of you go there to see what i mean.	The SDF is limited in its ability to influence educational objectives, apart from encouraging adequate land for educational facilities. Education is the mandate of the Western Cape Education Government.
	I think would be very nice to add to the developments, to encourage our towns to have public land to grow fruits and vegs, and to have the people in need get educated on it and they can access the food and learn about it, which will later be a source of income and sustainability. But well, Hope someone can actually understand what's coming if things are not taken into consideration!! PLEASE if we could invest for the person in charge of the SDF to go to INDIA for a day or Mexico, or just to your next door neighbouring countries!! and SEE what it means!! WE need to PREVENT the mistakes other countries are making!!! I see the goal is to be like Malaysia or Japan or Singapore, but the reality is that we are not prepared MENTALLY for it!! we need EDUCATION first!! to be able to get to those steps!!	The SDF includes guidelines to promote urban agriculture in the 'Urban Development - All Areas' Category.

Integrated District SDF and EMF Review: Comment on March 2021 Drafts

LIST OF COMMON CONCERNS IN BLAAUWBERG DISTRICT

Greater Table View Action Forum				
Nr	District Plan Sub theme	Key point	Comment	Response
1	General	Public Participation Process	Public participation was flawed as it excluded a large portion of the community due to the following: it was limited to online comments, deliberately excludes residents who do not have PC access as difficult to read the document on a cellphone, the feedback sessions were not a fair representation of the report, written comments to Sub Council offices should be allowed, The City's actions are unlawful and the City should extend public participation and allow written submission to the planning offices.	The public participation was lawful in terms of all legal requirements. Great effort has been made to have an authentic and inclusive public participation process. Multiple public meetings were held and transport offered to enable those without access to PCs or transport to be included. Documents were available to read at public libraries. Written comments were accepted at sub council offices. A second round of public participation on the reports is being undertaken between June 2022 - August 2022 to allow a further opportunity for comment.
2	General	Document Language	The first section of the plan uses high level language to deliberately confuse the reader.	There was no intention to confuse the reader. This criticism has been considered and effort made to use simple and consistent terminology. Certain terminology and sections of the document are prescribed by legislation and so those aspects could not be changed.
3	Utility Infrastructure	Infrastructure decline	The City has failed to upgrade the Potsdam Wastewater Treatment Plant which has resulted in increased levels of pollution in the Diep River, Millerton Lagoon, Table Bay Nature Reserve and The Beaches on the Table View Beach Front. The result of this failure by the City has resulted in the destruction of these critical natural resources. The upgrade of the Potsdam Wastewater Plant was highlighted in the 2012 report.	The Potsdam Waste Water Treatment Plant expansion is underway. The delay is regrettable, however the City has prioritised the expansion.
4	Utility Infrastructure	Sanitation	The city highlighted the need for sanitation services into Dunoon and Joe Slovo areas. It has not acted on this need. In fact, the people of Joe Slove frustrated by the lack of service delivery have taken to providing their own sanitation. Again, the City has failed to act on the agreed actions to be taken as highlighted by the District Plan 2012.	The DSDF shows a long term vision for the area. The Implementation Plan set out the required actions to enable this vision, however there are numerous challenges to implementation of the plan which is regrettable.
5		Zoning	The City has passed zoning and planning applications that are not in line with the Blaauwberg District Plan in 2012. In so doing it has acted against the wishes of the residents and rated payers.	Land use applications are assessed in terms of the criteria set out in the Municipal Planning By-Law. The District Plan must be considered in that criteria, however, it is not the only factor.
6	General	Failed implementation	Given that in the ten years that the 2012 district plan has been in place the City has failed to implement the most basic of provisions of the plan. And given that the City at will ignores the district plan. And given that residents have seen little accountability by those who are responsible for the lack of delivery and the non-adherence to the 2012 district plan. The city has failed to implement actions of the previous DSDF and continue to propose the same actions in this report. We would need to see within this plan commitments from the City in terms of accountability and punitive actions for city officials who ignore the provisions of the 2021 District Plan.	Agree with the need for implementation. A major change from the 2012 DSDF is that the Implementation plan has been vastly expanded and detailed to aid in prioritisation and implementation.
7	Urban Development	Urban Nodes	The guidelines for 'Urban Nodes (Section 4.3.2 on page 61) is in conflict with the sub-district guidelines for Blaauwberg Road (Section 5.1.3 page 88).	These sections are not in conflict, but do need to be read in conjunction with each other. The guidelines referenced have been reconsidered and reworded for clarity.
8	Conceptual designations	District Nodes and Urban inner core	The inclusion of the District Node around Bayside and Marine circle is objected to due to: perceived complications and confusion it brings, it is confusing and the plan should give guidance and clarity, it conflicts many of the title deeds in the area, it would support mixed use development in areas that are not on an activity route and is thus not compliant with policy, much of the area in the 2km is not within the Urban inner core, the inclusion of the district node was also not presented during the public participation process,	The confusion is noted and wording has been relooked for clarity. The 'Urban Node' designation is conceptual and must be applied contextually. The reference to 2km is part of general guidance for how far the node could be considered. The text explicitly states that it must be considered contextually and gives further suggestions on how to do so. Nodes do not need to be within the Urban Inner Core. The DSDF is a policy which describes a future development vision - it does not give or take away land use rights and so does not negate or conflict the title deed restrictions in the area. The proposed node was included in the maps and text of the draft SDF documents and presentations which were used in public participation. It is not a major shift in policy as suggested, as a node was present in the area in the 2012 District Plan.
9	Conceptual designations	District Node	The proposed Bayside and Marine Circle node is objected to due to it not being compliant with the Tall Building Policy, or the methodology to introduce gradual densification. The proposed 25+ du/ha and above with a minimum height of three to four storeys should be targeted for new developments and would be a massive increase not a gradual increase.	The Tall Building Policy will still be applicable for tall buildings which trigger it according to the criteria in the policy. The node designation shows an intention to be an area of more intense development than the suburbs around it.

10	General	Potential High Density Development	Area 1 Canary Crescent: Is an area next to a school and is subject to land use application Case ID 70494419 Erf 38251 which we understand has been withdrawn from the MPT schedule by the City. The inclusion of this area in the district plan as an area to be high density development is troublesome. This area is not within the development corridor of Blaauwberg Road nor is it within the Inner Urban Core. The inclusion of this ERF in the District Plan in our opinion is clear attempt to interfere with and pre-empt land use application 70494419. This must be removed from the draft district plan 2021.	The District SDF does not give land use rights. This site has been retained as a 'Potential High Density' new development area. This is based on the site's location in close proximity to Blaauwberg Road, within the Blaauwberg Road corridor, and a land use modelling exercise which estimated the potential residential yield on the site.
11	Urban Development	Site specific: Area 2 Wessels Rd	Area 2 Wessel Road is an area next to a school. It is not in the development corridor nor is it in the Urban Inner Core and thus its inclusion in this plan is not policy compliant. This must be removed from the draft district plan 2021.	Following engagements on the draft district SDF in April 2021 this site has been changed to a 'Potential Public Service Site' new development area.
12	Urban Development	Site specific: Erf 1117	Erf 1117: Disagree with guideline that 'Redevelopment of the site should facilitate the provision of public facilities and enable a range of entry-level and subsidy housing opportunities' for following reasons: the site does not lend itself to entry-level and subsidy level housing; it is not within the MSDP 'Urban Inner Core'; the area is not near work opportunities and major transport links, residents would need to use limited public transport to access work opportunities, journeys would be longer which is against TOD principles; entry- and subsidy level housing on the outskirts of the city supports Apartheid type planning principles where poorer people are forced to travel long distances (at expense) to work. Request removal of this section of the plan.	The principle of providing new housing opportunities near to job opportunities and other services, as proposed by the GTAF, is in alignment with the City's spatial planning principles. Developable land within the urban development edge is a scarce resource in Cape Town. Erf 1117 is a major opportunity due to its large size, road access and location within a developing area. The site has potential for great transport access due to it being bounded by the R27, and surrounded by the MyCiti network. There are existing and planned industrial and commercial areas relatively close to the site. The vision and plans for the Sunningdale/Sandown/Rivergate area is for continued residential, commercial and industrial development within the urban development edge. This will bring with it more job and housing opportunities. Residents would travel a shorter and cheaper distance compared to other site options for subsidised housing opportunities. In the long term, the site will be on the northern edge of the West Coast development area, but not isolated from urban development. The vision for the site is for a mixed use development which will provide a range of housing, job and development opportunities. The guideline to include public facilities will also reduce residents need to travel to access public services. Please also note that 'subsidised housing' refers to a range of housing products (e.g., social housing, FLSP-mortgages etc.) which caters for various household incomes from roughly R22 000 per month and less. An updated definition is included as the income brackets change from time to time due to changes in inflation and policy. The development guidelines include that both subsidised and market housing should aim to be provided. There is a fear that the City will plan an informal settlement – This is not the case, and any development on the site will need to follow the regular development application process e.g., to rezone the site will also require public participation. For an idea of how this could look, the Conradie Hospital development is an example. The development guidelines direct new development to be sensitive the surrounding area so that it is an integrated, inclusive and a vibrant addition to the area.
Big Bay MPOA				
	District Plan Sub theme	Key point	Comment	Response
14	Utility Infrastructure	Inadequate infrastructure	A densification strategy for the local area cannot succeed in a context of already inadequate infrastructure. The transport infrastructure is inadequate and will need to be upgraded. Inadequate transport infrastructure (new major road interventions are not coping with the current load).	Part of the proposals for new development are to balance the distribution of land uses in the area so that where people live and where they work/go to school/visit are closer together. This results in fewer/shorter trips being required and is one way to combat road congestion, albeit a long term strategy. The proposal for medium - higher density is not only based on the transport infrastructure but various other informants including accessibility, economic opportunities and addressing the spatial transformation principle.
15	Utility Infrastructure	Inadequate infrastructure	The water pressure is inadequate to meet current demands and will certainly deteriorate should further developments take place.	The City implements pressure management as a water saving measure and to reduce strain of wear and tear on infrastructure. This is continuously (daily) being adjusted. Should you experience pressure issues please log a service request with the City to attend to it.
16	Utility Infrastructure	Inadequate infrastructure	The sewerage infrastructure is also inadequate which allows sewerage spills onto our beaches which impacts negatively on our drive to obtain a Blue-Flag beach status.	Overflows in this area are not due to insufficient capacity (e.g., pipes too small) but rather the system being misused (e.g., foreign objects in the system) which causes a blockage and also wear and tear. Pipe replacement work is ongoing, albeit at a slower pace than we would all like to see due to operational and resource limitations.
17	Utility Infrastructure	Inadequate infrastructure	The infrastructure of this area simply will not be able to cope with the significant increase in high density development envisaged, and our Associations are of the view that the cost and environmental impact of the scale of upgrade necessary for this Framework will not be feasible. In order to avoid high density and new development areas as shown in the Framework having to be reduced significantly, the City must urgently come up with an Action Plan (infrastructure roll out with associated capital and operational budgets tied to benchmark time frames for delivery).	It is noted that the issue of infrastructure capacity needs specific attention. However, new development is required to increase the supply of housing in Cape Town, and provide space for economic opportunities. That being said, all land use applications where there are a change in land use rights are circulated to the line departments. Infrastructure departments provide comment on whether the infrastructure can accommodate the proposed development, and/or if mitigating upgrades will be required. Since the previous SDF, there the Implementation plan has been expanded on substantially and includes details to aid in prioritisation and implementation of new projects.
18	Urban Development	Service delivery	The city will need to succeed with service delivery in the Blaauwberg region in order to show that it will be able to cater for future development catered for in the draft BSDF.	This is a complex issues and noted. Future development is necessary, and service delivery is an ongoing process at albeit at a slower pace than we would all like to see due to operational and resource limitations.

19	Koeberg NPS Evacuation	Koeberg & Associated Emergency Planning	Our area falls within the 16km radius zones surrounding Koeberg power station and thus we form part of the evacuation route and express the concern about the impact of further development will have on the safety of residents.	New residential development is subject to demonstration that the emergency evacuation plans will not be negatively impacted.
20	Koeberg NPS Evacuation	Koeberg & Associated Emergency Planning	The draft BSDP should thus address the status of KNPS (including its anticipated life span) and potential impact on the development contemplated in the draft BSDP in more detail. It goes without saying that Eskom and the National Nuclear Regulator should also be requested to provide their comments on the draft BSDP.	This point is noted. We are aware that there are applications for an extension of life span. The operational and physical safety precautions of Koeberg are managed by Eskom, regulated by the National Nuclear Regulator and strict international nuclear regulations. Documents will be circulated for comment.
21	Urban Development	Designation of Public Open Space	Designation of Public Open Space for infill residential development contrary to Governing Principles. We object any Public Open Spaces being re-designated for future low density infill housing. Apart from these amenities providing much needed recreational areas for residents both now and in the future, they also provide abutting houses an existing real right w.r.t. view corridors i.e., property prices have been established as a function of these view corridors and any considered amendment is strongly objected to.	Most of the Public Open Spaces that were suggested for urban development have been changed for this revised draft due to the need to provide sufficient open space, especially in areas of potential densification. In some instances urban development is still considered an option. Should the land owner pursue this land use they will not go through a land use management process which will take all relevant considerations into account. Such as: environment, traffic, infrastructure etc. South African law does not establish a 'right to a view'.
22	Informal Sector	Negative impacts of Informal Trading and Taxi's ranks along Otto du Plessis Drive not adequately investigated.	There are negative impacts of informal trading and taxi ranks along Otto du Plessis Drive and we urge the city to better investigate this. The BSDP report does not provide any details of where and how the informal trading will be managed, such activities may result in destruction of property value and reduced income to the City.	The informal sector is an important sector of the economy. General guidelines are included under the Urban Development SPC in the BDSDF. An informal trading plan will need to be done.
23	Informal Sector	Infrastructure for the informal economy	Policy point 3.3.1.6 on Page 23 of the BSDP Technical Report, provides a directive for the promotion of infrastructure for the informal economy in highly accessible areas. This is a general but potentially very harmful policy as the Table View beachfront, the Blouberg Village parking areas and Big Bay beachfront are all highly accessible. Unfortunately, the policy does not provide details / directives of areas and control over the placement and/or activities which could result in uncertainties when considering the merits of approving such activities and the implementation. As such more detail prior to considering this initiative is required. Again, the promotion of these activities will stress the already inadequate infrastructure for parking and public ablution facilities, especially as experienced during the summer holiday period.	Please see updated 'Urban Development - General (all areas)' guidelines which includes provisioning for the informal sector.
24	Informal Sector	Infrastructure for the informal economy	Page 48 of the BSDP Technical Report refers to supporting and prioritizing infrastructure for informal trading at highly accessible / destination locations (Table View beachfront, Blaauwbergstrand and Big Bay are all identified as destination places). The policy directive though does not provide any details and it is recommended that the City provides details of where and how the informal trading will be managed prior to supporting such an initiative. Such activities can result in destruction of property value and reduced income to the City.	Please see updated 'Urban Development - General (all areas)' guidelines which includes provisioning for the informal sector.
25	Urban Development	Erf 1117	Table 14 in Section 2.5 (Pg. 31) of the Draft BSDP Implementation Plan, fails to identify Erf 1117 as requiring a precinct/local area planning initiative. The draft BSDP is strongly objected to on this basis. We firmly believe the City should initiate a Local Spatial Development Framework / Precinct Plan process in terms of Section 12 of the Municipal Planning By Law in relation to Erf 1117. The local area spatial development framework must follow a formal public participation process, as set out in the By Law so that the community can give their input. The outcome would be a Local Area Spatial Development Framework for Erf 1117, with associated development guidelines that will be formally adopted as official Council policy.	The owner of the land is responsible for undertaking its planning and has been doing so. Instead of the City looking at an LSDF, suggestions for further guidelines in the BDSDF are welcome. There are substantial reservations of undertaking planning for such a large (200+ ha) piece of land the City does not have ownership of, or control to implement. The land owner will need to follow all relevant processes w, including opportunities for public comment on whatever proposal is put forward.

26	Urban Development	Erf 1117	The property is unfenced, mostly covered in alien vegetation and is subject to some informal settlement. The current condition of the property, the ongoing lack of certainty as to when development will commence and also the nature of that development, is of great concern to our community. In addition, due to the location of the site, its characteristics, its natural and built environment context and its government ownership, the ultimate development of the site will have far reaching significance and thus needs to be undertaken with great care, professional assessment along with community consultation.	Noted. All relevant processes will need to be followed, including opportunities for public comment on whatever proposal is put forward.
27	Urban Development	Future Development status of Erf 1117 Blaauwberg: Proposed Framework contrary to Governing Principles.	On the technical report, we point out specifically page 93 point r number 4 which is in direct conflict with the comments on page 45 point 5. The high-level statements made in the draft 2021 BSDP with regards to the site, particularly on pages 93 and 94 of the report (NDA 5.r)), have only served to create greater uncertainty amongst the greater Big Bay and Bloubergstrand Community as to the ultimate nature of the development of Erf 1117. We understand that the Department of Human Settlements has earmarked this stand for 8310 Mixed Income housing opportunities, and we are gravely concerned that the current wording of the Supporting Land Use Guidelines leans to mainly low-income housing in support of the Departments plans. We suggest NDA 5.r) 4 be substantially reworded, since it is in conflict with the broader guiding principle of preservation of existing character of the area as described on page 45 of the Draft.	The guidelines state that the character of an area must be considered, that is not the same as preserving it without any change, in which case any form of development/ ordinary progressions would be impossible. Developable land within the urban development edge is a scarce resource in Cape Town. Erf 1117 is a major opportunity due to its large size, road access and location within a developing area. The site has potential for great transport access due to it being bounded by the R27, and surrounded by the MyCiTi network. There are existing and planned industrial and commercial areas relatively close to the site. The vision and plans for the Sunningdale/Sandown/Rivergate area is for continued residential, commercial and industrial development within the urban development edge. This will bring with it more job and housing opportunities. Residents would travel a shorter and cheaper distance compared to other site options for subsidised housing opportunities. In the long term, the site will be on the northern edge of the West Coast development area, but not isolated from urban development. The vision for the site is for a mixed use development which will provide a range of housing, job and development opportunities. The guideline to include public facilities will also reduce residents need to travel to access public services. Please also note that 'subsidised housing' refers to a range of housing products (e.g., social housing, FLISP-mortgages etc.) which caters for various household incomes from roughly R22 000 per month and less. An updated definition is included as the income brackets change from time to time due to changes in inflation and policy. The development guidelines include that both subsidised and market housing should aim to be provided. For an idea of how this could look, the Conradie Hospital development is an example. The development guidelines direct new development to be sensitive to the surrounding area so that it is an integrated, inclusive and a vibrant addition to the area.
28	Urban Development	Taxis and informality	A number of informal Taxi Ranks have sprung up in various areas along Otto du Plessis Drive and outside various shopping areas such as West Coast Village. Local law enforcement is already stretched in dealing with this matter and we cannot see how they will succeed if it is expanded.	While the point is noted, this is not a spatial planning issue and should be dealt with as part of urban management and operational matters.
29	Urban Development	Erf 1117	The District Spatial Development Framework Plan on Pg. 106 of the Draft BSDF Technical Report, shows the entire Erf 1117 as earmarked as "new development area" (yellow), in contrast to the Blaauwberg Conservation Area (in green) immediately to the north. However, the Sub District 3 Framework Plan on Pg. 94, of the Draft BSDF Technical Report shows the northern portion of the site as green and the following is stated in the associated Guidelines Table for New Development Areas on Pg. 93 of the Technical Report: "The northern portion of erf 1117 contains pristine critically endangered vegetation. This and the associated dune ridge should be incorporated into the Blaauwberg Nature Reserve as notionally indicated" The Consolidated BSDF Plan on Page 106 must therefore be amended so that the green area includes the northern portion of Erf 1117, as per the Sub district plan. We also believe it important that the 'green' zone be extended along the entire western boundary of Erf 1117 to link the northern with the south western green infrastructure.	The map has been amended.
30	Urban Development	Local Spatial Development Frameworks need to be undertaken for the entire Beach front area from Dolphin Beach to Big Bay.	There is very little in the way of detailed spatial planning and mitigations for this critical corridor that arguably is the main economic driver and public amenity in the area. As one of the fastest residential growth areas in the country this public facility requires urgent attention, and we therefore request that the City also immediately initiates a Local Spatial Development Framework / Precinct Plan process in terms of Section 12 of the Municipal Planning By Law and ensure wide public participation in this process. Furthermore, an associated adequate budget for the upgrade of the beach front area must also be set aside by the City.	The need for an LSDF for this area is noted in the Implementation Plan section. Further comments and suggestions for the District SDF guidelines are welcome.
Table View Rate Payers Association				

	District Plan Sub theme	Key point	Comment	Response
31	General	Process and Plan - bias to developers	The plan is incomplete and biased to developers. Proper analysis to be carried out and all impacts to be considered before submission for approval. There is far too little detail in this regard for the residents to get a reasonable assessment of what impact it will have on the local community.	The District SDF follows on the extensive Baseline and Analysis Reports which were compiled and advertised for public comment in 2019. More detail is appropriate at local level planning. The District SDF gives higher level guidelines. No specific development proposal is being made/ applied for in this document.
32	General	Process and Plan - lack of communication	The general dissatisfaction of residents is noted in terms of the lack of effective communication with the ratepayers on the City's advising residents of the commentary period.	The SDF process has been extensively advertised. There was public participation on the Baseline documents and 2 rounds of public participation on the draft SDF documents. This is a total 180 days in which to give input since 2019.
33	General	Plan - lack of sustainable growth	The draft SDFs and EMFs should reflect the planning and spatial vision for the City and should reflect the City's response to managing urban growth on a district level in a manner that is sustainable, resilient, and equitable. The feeling is that the City has failed to ensure sustainable growth and does not represent the vision of the residents or the needs of the residents by creating infrastructure that could sustain such mass densification plans.	The vision for sustainable, resilient, and equitable planning and development is shared by the planning department. All future development has many facets that are to be considered, including specialist studies, including infrastructure needs. Your input is welcomed during this advertising period.
34	General	Process and Plan - lack of consultation	Once approved by the City Council, the district SDFs and EMFs will become the "Bible" from which all future decisions about developments and land uses will flow. The lack of consultation with residents, prior to drawing up the draft plans, and the lack of detail that is evident on the formulation of mass densification policies requires a rethink on the part of the City's planners and Council members. It is astounding to note that the planners that drew up these plans had not even bothered to visit the areas on which they were drawing up the plans, as was ascertained when we attended the presentation at sub council 3 officers on the 11 May 2021, is shocking!	Public input has been considered in revising the second draft documents. The SDF process has been extensively advertised. There was public participation on the Baseline documents and 2 rounds of public participation on the draft SDF documents. This is a total 180 days in which to give input since 2019. The planners in the team either live in or visit the district regularly.
35	General	Plan - lack of sustainable growth	The existing draft plan is missing in its duty requirements of planning on a basis of resilient and equitable development. No mention is made as to what number of residents will trigger new infrastructure developments such as roads, water treatment works, schools and health care facilities. If the basic infrastructure is not planned for in development plans then the city plans to fail at sustaining growth that is managed in a fair and equitable manner.	Please see Volume 4: Implementation Plan and the IDP for an annually updated plan of major infrastructure improvements. The infrastructure master plans are also aligned with the spatial planning vision of the City.
36	General	Legal requirements RE new development	The legal requirement to take care as espoused in the National Building Regulations and Building Standards Act 103 of 1977 and the 19 February 2019 Constitutional Court Judgement of the Trustees of the Simcha Trust v Da Cruz and Others; City of Cape Town v Da Cruz and Others [2018] ZACC 8 states that a Local Authority may NOT approve building plans which may devalue surrounding properties has been ignored by the planners. The judgment upholds the duty of local authorities to uphold the rights of existing ratepayers to maintain the current value and to ensure the increase in value of the residents in an area. The excerpts from the judgement, below, puts an onus on the City's planning department to plan in a meaningful and safeguarding manner that is both lawful and reasonable. The draft plan shows a lack of reasonableness, lawfulness and procedural fairness.	Noted.

37	General	No detailed definitions	No detailed definitions are provided in the draft overlay plan to explain exactly what is meant by terms such as "mixed-use developments", "affordable housing" and "low-cost housing", to name a few. Giving rise to claims of plausible deniability on the part of planners and City officials when challenged at later stages in the planning tribunals and the courts of law.	Please refer to the definitions in the latest (2022) Draft - Annexures document
38	Urban Development	Objection to low-cost housing	The residents of the Greater Table View object to any Public Open Spaces being re-designated for future low density infill housing.	Most of the Public Open Spaces that were suggested for urban development have been changed for this revised draft due to the need to provide sufficient open space, especially in areas of potential densification. In some instances urban development is still considered an option. Should the land owner pursue this land use they will not go through a land use management process which will take all relevant considerations into account, such as: environment, traffic, infrastructure etc.
39	Utility Infrastructure	Infrastructure capacity	It serves absolutely no purpose to plan for such extensive densification when the existing infrastructure is already failing the needs of existing residents. Until the basic infrastructure is built to a capacity to sustain the growth of an area it would appear that these plans are doomed to failure	It is noted that the issue of infrastructure capacity needs specific attention. New development is required to increase the supply of housing in Cape Town, and provide space for economic opportunities. That being said, new development is subject to infrastructure capacity, so this is considered. Since the previous SDF, there has been an inclusion of a Implementation plan, and this has vastly expanded details to aid in prioritisation and implementation
40	Utility Infrastructure	Infrastructure capacity	How will the roads and infrastructure be upgraded to account for high-density dwellings, additional traffic both car and pedestrian? The current infrastructure can barely accommodate its current residents. How is the area to be evacuated in a crisis i.e. nuclear leakage or natural disaster. The current transport infrastructure is inadequate and will need to be upgraded.	The District SDF gives a future vision. It does not give or take away development rights. New development will still have to go through the necessary land use approval processes, during which availability of infrastructure, including transport capacity, is considered. Mitigating actions are required where a negative impact is anticipated. New residential development is subject to demonstration that the evacuation emergency plans will not be negatively impacted.
41	Utility Infrastructure	Water supply and infrastructure:	The residents in the West Beach / Blouberg area struggle already with the effects of an aged water supply system, experiencing continuous outages and insufficient water pressure to cater for the existing residents. What studies have been done to assess the impact to the water system if High density dwelling are erected? What upgrades will be done to ensure residents are not negatively further impacted? The water pressure is inadequate to meet current demands and will certainly deteriorate should further developments take place.	The City implements pressure management as a water saving measure. This is continuously (daily) being adjusted. Should you experience pressure issues please log a service request with the City to attend to it. Please see Volume 4: Implementation Plan and the IDP for an annually updated plan of major infrastructure improvements. The infrastructure master plans are also aligned with the spatial planning vision of the City.
42	Utility Infrastructure	Sewerage	Infrastructure is aged and regularly overflows, this affects the sea quality of our coast line. What studies have been done to assess the impact on the sewerage system if High density dwelling are erected? What budget and upgrades will be made to accommodate? The sewerage infrastructure is also inadequate which allows sewerage spills onto our beaches which impacts negatively on our drive to obtain a Blue-Flag beach status.	Overflows in this area are not due to insufficient capacity (e.g., pipes too small) but rather the system being misused (e.g., foreign objects in the system) which causes a blockage and also wear and tear. Pipe replacement work is ongoing, albeit at a slower pace than we would all like to see due to operational and resource limitations. Please also see Volume 4: Implementation Plan and the IDP for an annually updated plan of major infrastructure improvements. The infrastructure master plans are also aligned with the spatial planning vision of the City.
43	Transport and Route Design.	Transport - Traffic Congestion	This addition of high density dwellings will require significant upgrades to the existing road infrastructure, at a extra cost to the already overburdened ratepayers: Our current infrastructure is already severely constrained as is.	The Municipal By-Law requires that this is considered in a development application in terms of assessing 'desirability'. The land use office can insert conditions on the development approval to mitigate any negative impacts. This includes transport related, e.g., for the development to take place certain upgrades must be done by the developer, as is happening in Sunningdale, Sandown etc. where there are large scale new development areas.
44	Environment	Ecological impact studies :	Ecological impact studies – The Blaauwberg Nature Reserve, Table Bay Nature Reserve, the Wetlands by Dolphin Beach Hotel, the wetland at the entrance to Melkbosstrand and the entire Beachfront is home to birds, fauna, flora, and amphibians. It's also widely used by the community for exercising and dog walking. What ecological impact studies have been completed? Where will our community walk their dogs and exercise?	The district SDF is not a specific development application. As such, specialist studies are not required. However, extensive engagement with the Environmental Management Department took place which informed the SDF. Any future development proposals need to include all relevant specialist studies such as environment, traffic, infrastructure etc. and proposals should make provision for recreational space.
45	Environment	Ecological impact studies :	The field in Wessel's road is home birds, fauna, flora and amphibians. It's also widely used by the community for running and our dog walking community. What ecological impact studies have been completed? Where will our community walk their dogs and exercise?	Most of the Public Open Spaces that were suggested for urban development have been changed for this revised draft due to the need to provide sufficient open space, especially in areas of potential densification. In some instances urban development is still considered an option. Should the land owner pursue this land use they will not go through a land use management process which will take all relevant considerations into account. Such as: environment, traffic, infrastructure etc.
46	Facilities	Facilities - Schools	Schools – Our area is short on public schools primary and high schools. No provision has been made on the current plan for ANY public schools	Need for schools noted. Schools are not a City mandate. The Western Cape Education Department is responsible for schools and the comment will be sent to them. However, the current struggle for school capacity has been noted. Two public school sites are also planned in the Rivergate development, among other private schools.

47	Facilities	Facilities - Local Magistrates Court	Local Magistrates Court – The greater Table View and Melkbosstrand area are in need of a local Magistrates Court, as the closest facility is either in Atlantis of City of Cape Town CBD, which isn't easily accessible to the members of the community, who aren't fortunate to have access to their own personal transport, or afford the costs of the limited public transport.	This point is noted and the gap will be considered.
48	Facilities	Facilities - clinics and hospitals	Local clinics, public hospital – no mention was made for these to service the under privileged community. Where are these to be included?	In general, the DSDF does not suggest individual sites, as that is too detailed for the level of a district SDF. A new civic node is proposed in Sandown at the Parklands/Broad Road and Sandown Road intersection and land is being set aside for a public health facility.
49	Urban Development	Densification	Our infrastructure is inadequate for densification – spatial plan is incomplete. Where are the plans to upgrade and improve?	Please see Volume 4: Implementation Plan and the IDP for an annually updated plan of major infrastructure improvements.
50	Informal Sector	Informal Trading and Taxi Ranks	Negative impacts of Informal Trading and Taxi's ranks along Otto du Plessis Drive & Sandown road not adequately investigated. Proper impact assessment to be completed for identified sites	The informal sector is an important sector of the economy. General guidelines are included under the Urban Development SPC in the BDSDF. An informal trading plan will need to be done.
51	Transport and Route Design.	Taxi Holding Areas	No consideration for TAXI holding areas along all major routes especially near major retail centres such as West Coast Village, Table Bay Mall, Bayside Mall, Sandown Retail Crossing, Seaside Village, Eden on the Bay, Flamingo Square. Proper impact assessment to be completed for identified sites.	This is the transport department mandate and will be passed on to them.
52	Conceptual designations	Definition of Mixed Use	In the current densification plan there is no adequate explanation to what the term "mixed use" refers to. How is this defined?	Please refer to the definitions in the latest (2022) Draft - Annexures document
53	New Dev. Areas	Beachfront	And where is the detail regarding the beachfront in relation to it being developed into a business node in terms of the Spatial Development Plan? Beach front – There is no real plan as to what must happen on the beachfront and a 3km development radius of both Marine Circle and Blaauwberg Road is too vast. It is suggested that it be limited to 200m on either side, for densification or are we merely creating slums for future generations to have to deal with?	The Beachfront is proposed for a separate, more detailed local plan.
54	Residential	Homeless and lack of housing	HOMELESS PEOPLE - This area is seemingly out of control. People are scattered all over and nothing has been done to accommodate these human beings in one or another way. There is currently in excess of 13 000 homeless people with just over 2000 shelter beds available. This is an inhumane way to deny people their basic dignity or a chance to be reintegrated into society. Where in our area is provision made to house a community centre, job seekers centre and a shelter for abused women and children, a shelter to house families and a shelter to house the homeless?	This is a complex issue which is primarily the mandate of the department of social development. The SDF is limited in its scope to address this issue. Land for potential new development for housing has been identified.
55	Facilities	Need for animal welfare facility	ANIMAL WELFARE - Where on this draft plan is any provision made to look after the animals in our area such as an SPCA office or even a sterilization unit.	This is too detailed for a district level SDF.
56	Utility Infrastructure	Sewage	Why must SEWAGE WATER be released into the sea? We are currently toxifying the oceans with chemicals and pharmaceuticals and changing the PH values thus poisoning a valuable food source. Why is it not purified and re-used and re-circulated into the system?	Water quality is noted as a major concern in the district. Sewage is treated to the licensing standards of the treatment works before it is discharged towards the sea. Water re-use is in place in parts of the City, e.g., Atlantis aquifer is recharged with treated waste water
57	Urban Development	Informal Settlement	INFORMAL SETTLEMENTS - No mention is made on how the city plans to deal with the current mass informal settlement that has taken place just outside Dunoon and that is encroaching into the Parklands, Parklands East Deep River nature reserve and growing in size on a daily basis?	This is a complex issue which is primarily the mandate of the department of human settlements. The SDF is limited in its scope to address this issue. Land for potential new development for housing has been identified.
SAACP				
	District Plan Sub theme	Key point	Comment	Response
58	Utility Infrastructure	Infrastructure Capacity	Concern regarding infrastructure capacity in the region. Specifically: sewerage treatment capacity constraints at Potsdam WWTW; stormwater system pressures from increased informality and inadequate access to sewer resulting in contaminated stormwater system and ecological degradation. Call on the City to develop an action plan (infrastructure roll out with associated capital and operational budgets tied to benchmark time frames for delivery) to address infrastructure provision to enable new development. Should include Roads, Civil Engineering, Electricity and Finance.	The Infrastructure Sector Plans address this need. These will be part of the annual IDP review. Electricity generation is not a City mandate, although the City attempts to alleviate the current shortcomings in supply as and where possible.

59	Urban Development	Implementation of higher level policies	Need for greater levels of local area plans to aide implementation of higher level policies and spatial frameworks and more narrowly interpret high level policies and principles such as densification and TOD. Particularly in older areas where residents and politicians have more conservative development views which are not in line with TOD Strategic Framework, Densification Policy etc. and thus large TOD-supporting applications are turned down on appeal. The 2012 district guidelines were too broad and interpreted too conservatively. More detailed local plan would address this. Example: Table View.	Agreed, a major change from the 2012 DSDF is that the Implementation plan has been vastly expanded and detailed to aid in prioritisation and implementation. Within this Implementation Plan there is Proposed Mechanisms (and the identification of Development Focus Areas to aid in the implementation of such Policies.
60	General	Need for Local Area Planning	Local Area planning enables all stakeholders (the community, developers, professionals/officials and politicians) to collectively drill down into the local area's unique characteristics and arrive at sustainable development solutions that give clear direction to both developers and decision makers. As the draft BSDP Implementation Report correctly concludes, developers and their professional teams face enough challenges in securing planning permissions, not to have to also deal with the risk of having their applications turned down on appeal (at the end of the planning process), due to a clear difference of opinion between officials and MPT (on the one hand) the PAAP committee on the other, as to how the same set of policies should be interpreted in relation to their development proposal.	Agreed to the need for enabling Local Area planning. As mentioned above, the Implementation plan applies Proposed Mechanisms, such as Streamlined Land Use Application Process for Priority Areas Unified for e.g., that seek to assist in these kind of challenges.
61	Environment	Challenges for Developers	Developers need a certain level of certainty and while they may expect the final decision makers to require adjustments to their development proposal in order to for example accommodate valid community concerns, it is clearly unacceptable for them, after having pre-application consultations with officials in which broad policy support is confirmed, to then spend easily over a million rand on professional and Council fees (not to mention holding costs), wait two years for a final decision, only to have their development projects refused in entirety/to the point that they are no longer viable, on appeal. Surely developers faced with such prospects will think twice before attempting to develop again in the Blaauwberg area/or in the rest of the City for that matter. Taking all of the above into account, for the City to have only adopted a handful of local area plans in the last 10 years and for the City and applicants to have to have to still rely on local plans that are over 20 years old, is clearly of great concern.	The components of the Implementation Plan work together to provide clear direction and certainty in spatially targeted areas. This includes two interventions which apply directly aiding in clarity for developers issues brought out: 1) Ease of Process: removing red tape and improving institutional efficiencies by withdrawing contradictory or overlapping local planning policy with the approval of the DSDF, or pursuing mechanisms to streamline processes such as development applications in line with strategic planning initiatives to provide certainty and transparency to developers and businesses. 2) Enabling Incentives: Development Mechanisms to stimulate private sector development and leverage public investment designed to change the behaviour of role-players in the property development process or influence their decisions in order to achieve specific outcomes.
62	Urban Development	Precinct Planning needed	Precinct Planning needed to assist in identification and release of government land for urgently needed development (affordable housing, spatial transformation, kick start development and construction industry)	Noted and agreed. One of the key parts of the Implementation plan includes identifying future local and precinct planning frameworks. Based on the technical review and inputs to date, several planning and investment precinct or site specific planning initiatives where further work is needed to unlock strategic land for development have been identified.
63	Koeberg NPS Evacuation	Status of the Koeberg nuclear power station	The BSDF should address the status of the Koeberg nuclear power station - lifespan and impacts on development in more detail.	This point is noted. We are aware that there are applications for an extension of life span. The operational and physical safety precautions of Koeberg are managed by Eskom, regulated by the National Nuclear Regulator and strict international nuclear regulations.
64	Koeberg NPS Evacuation	Development areas in the 0-16km Koeberg B	Concern of intended development on Erf 1694 Melkbos, and other development areas in the 0-16km zone: Erf 1117; Parklands and Sunningdale should proceed without compromising the integrity of the Koeberg Emergency Evacuation Plan. Must avoid a repeat of a hold on new development as happened in early 2000s.	This is an important point and is noted. New residential development is subject to demonstration that the emergency plans will not be negatively impacted. The operational and physical safety precautions of Koeberg are managed by Eskom, the National Nuclear Regulator and strict international nuclear regulations.
65	Koeberg NPS Evacuation	Comment needed from Eskom	Eskom and National Nuclear Regulator must be requested to provide their comments on the BSDF.	Eskom and the National Nuclear Regulator will be provided opportunity to comment
66			The Spatial Planning, Land Use Management, Transport and Disaster Management Departments are called on to actively work with Eskom, the National Nuclear Regulator (NNR) and the property development industry in order to ensure that the much needed development earmarked in the BSDP can indeed safely and responsibly be accommodated in the 5-16km radius area in particular. This strateav must include: • An effective and well-staffed Traffic Evacuation Model Committee (TEM) that meets at least monthly to consider development applications in the 0-16km zone (Spatial Planning should also be represented on the TEM);	This detailed input is appreciated and noted. Will refer to appropriate line department.
67				This detailed input is appreciated and noted. Will refer to appropriate committee

68	Koeberg NPS Evacuation	Suggested Strategy to accommodate 5-16km radius area in particular.	- Regular engagements with Eskom and the NNR in order to ensure that the City's development and spatial planning vision is taken into account and always on the agenda; - A pro-development agenda amongst City officials, that recognizes the critical importance of development within the 5-16km radius being allowed to proceed; - Clearer and more concisely worded set of development restrictions for the 5-16km radius areas in both the DMS and BSDP are required. For example, the following statement on Pg. 100/101 of the draft BSDP Technical Report appears vague and ambiguous: "The City shall decide a development application that may have a potential adverse impact on nuclear safety of the Koeberg Nuclear Power Station, as may be determined from time to time by the Regulator, after consultation with the Regulator and Eskom." - The following statement on Pg. 100 also requires clarification: "Development Management Scheme Item 158 (as amended) NB: will be superseded by the national Regulations on Development in the Formal Emergency Planning Zone of the KNPS, when approved." The authorities requested to actively consult with the public and property development industry before these Regulations are finalized and the potential implications of shutting down all new development in the 5-16km in particular must be fully ventilated.	This detailed input is appreciated and noted. The need for regular engagements to assist in aligning development is acknowledged.
69				This detailed input is appreciated and noted.
70				The guidelines have been rewritten to be simpler.
71				Noted, however the National Department of Mineral Resources and Energy is responsible for the regulations, not the City. The guidelines have been rewritten to be simpler.
72	Urban Development	Support the suggested local area plans	Support the suggested local area plans (Table View Beachfront, Du Noon/Doornbach, review of Blaauwberg Road Management Strategy.	Noted.
73	Transport and Route Design.	Blaauwberg Road Review expanded	Suggest Blaauwberg Road Review expanded to include more of Table View: the broader area around Bayside up to Donkin Road and possibly as far North as Park Drive and possibly as far south as the Tennis Club. This area forms a potential redevelopment node around the Bayside MyCiti main station and the Bayside and Table View Malls.	Noted the Blaauwberg Road Management Strategy 1998 Draft is suggested as one of the Policies to be amended.
74	Urban Development	Table View Beachfront Area Local Area plan	Suggest Table View Beachfront Area Local Area plan must be expanded to include the Marine Drive precinct, as well as the area between Bayside/R27, the Beachfront, Porterfield Road in the north and Marine Drive in the south.	Supported.
75	Urban Development	Melkbosstrand CBD local area plan	Suggest Melkbosstrand CBD local area plan required to build and update draft guidelines developed in early 2000s	The Planning department has considered the LSDF proposal, and considering other areas in need of local planning and the availability of resources, has not prioritised Melkbos LSDF.
76	Transport and Route Design.	Koeberg Road Management Strategy	The Koeberg Road Management Strategy which dates back to 1998, needs to be updated and/or fully incorporated into other local area planning initiatives. A key focus should be to facilitate a gradation of density, height and land use away from Koeberg Road into the residential areas beyond. Key routes that form linkages to the R27 and its associated MyCiti trunk route, notably Section Street, Boundary Road, Loxton Road, Zastron Road and Racecourse should also form part of the study area.	Noted, the Koeberg Road Management Strategy is proposed for review.
77	Transport and Route Design.	Sub-District Proposals	In terms of the Sub-District proposals, notably reference to the development potential of Bosmansdam Road, and sections of Sanddrift and Tijgerhof for redevelopment do not seem to have been sufficiently considered. In our view a Bosmansdam Road and surrounds Local Area Plan is urgently needed. Bosmansdam Road is a key connector between Koeberg Road and the N7 and N1 and also connects Milnerton to Century City, Montague Gardens and Edgemead. It has recently been duelled to accommodate considerable traffic flow and has a MyCiti feeder route. Potential for further mixed use and higher density development along the road, as well as within the adjoining sections of Sanddrift should be considered.	Noted, currently not a department priority given limited resources already allocated in the short term and other areas requiring local area planning, but will be considered in the medium term.
78	Conceptual designations	Sunningdale	Sunningdale: It is questioned why the blue mixed use intensification zone should not be continuous along Berkshire Boulevard between the R27 and Wood Drive.	Noted and considered.
79	Urban Development	LSDF for Erf 1117	We believe the City should initiate a Local Area Spatial Development Framework / Precinct Plan process in terms of Section 12 of the Municipal Planning By Law in relation to Erf 1117.	The owner of the land is responsible for undertaking its planning and has been doing so. Instead of the City looking at an LSDF, suggestions for further guidelines in the BDSDF are welcome. There are substantial reservations of undertaking planning for such a large (200+ ha) piece of land the City does not have ownership of, or control to implement. The land owner will need to follow all relevant processes, including opportunities for public comment on whatever proposal is put forward.

80	General	Wording - need for clarity Guidelines Table for New Development Areas	While it is appreciated that this was not the intention, the high-level statements made in the draft 2021 BSDP with regards to the site, particularly in the Guidelines Table for New Development Areas on pages 93 and 94 of the report (NDA 5(r)), have only served to create greater uncertainty amongst the surrounding community as to the final development outcome for Erf 1117.	Has been reworded for clarity
81	Environment	Erf 1117	Erf 1117 - Mapping inconsistency between sub-district plan which shows northern section as green and rest of the sites a yellow new development area and district level plan which shows whole site as yellow new development area. Consolidated District level plan should be amended to match sub-district plan i.e.. to show northern portion included in Blaauwberg Nature Reserve.	Some large sites, including this one, have been amended. As a principle the entire site intended for new development is shown as an NDA on the district level map. On the sub-district map more detail is provided.
82	Urban Development	Melkbos CBD	Melkbos CBD - sub-district guidelines supported but ability of 6th avenue to accommodate new development in limited.	Noted, guideline wording has been refined for clarity.
83	Environment	Erf 1694	No feedback has been given on the NEMA process, and suggestions of Option 5 proposal for Erf 1694.	Queried with the project manager. The NEMA process will likely need to be redone due to certain studies not being recent enough for the regulating authority after uncontrollable delays. The project is still being pursued.
84	Urban Development	Erf 1694	Delays in government institution processes creates uncertainty for surrounding land owners. Request for government to quickly conclude processes relating to Erf 1694, or initiate a local spatial development framework. Last one is the 1998 Melkbos CBD Development Framework which is outdated.	Queried with the project manager. The NEMA process will likely need to be redone due to certain studies not being recent enough for the regulating authority after uncontrollable delays. The project is still being pursued. The Planning department has considered the LSDF proposal, and considering other areas in need of local planning and the availability of resources, has not prioritised Melkbos LSDF.
85	Urban Development	Mapping inconsistency	Mapping inconsistency - The Sub-District 4 Plan shows a portion of erf 1694 as a new development area, while the overall district SDF plan shows the entire site.	Some large sites have been amended. As a principle the entire site intended for new development is shown as an NDA on the district level map. On the sub-district map more detail is provided.
86	Conceptual designations	Suggest rephrasing Sub District 3 Table	Suggest rephrasing Sub District 3 Table on Pg. 88 (b) (3) and (4) which are at risk of being misinterpreted as a maximum instead of setting minimums. With base zone heights along the corridor of around 6 storeys, as well as the adopted TOD Policy advocating heights of 4-15 stories for TAP corridors, the BSDP must make a much stronger statement that supports increased permissible height for redevelopment given that Blaauwberg Road is one of the most effectively functioning MyCiti/TOD corridors in the District, if not the whole City.	Noted and rephrased. The Blaauwberg Road Management Strategy is also proposed for review to update the land use guidelines. More detailed guidelines can be included in that process which we hope you will be part of.
87	Conceptual designations	Suggested amendment of wording	Suggest wording: Support mixed-use development along Blaauwberg Road with building heights of five to seven storeys in the first row of properties abutting the road, with more height appropriate at nodes and intersections, or where the underlying base zone of the property already permits such height. Deviations from the contextual zoning and building heights should consider the Tall Building Policy.	This detailed input is appreciated and the guidelines have been reworded.
88	Conceptual designations	Rewording needed	Similarly point 4 needs to be reworded. As a starting point it is only the section of Blaauwberg Road between Bayside and Janssen Road that has SR1 zoned second and third row properties. All other second and third row properties are already zoned either GR3 or GR2, (allowing apartments with either 15m or 20m of height i.e. 5-6 stories). Point 4 should be reworded to support apartments of 3-4 stories in height in the second row of properties and then possibly group/town housing in the third row (where these properties require rezonings). This will allow a more logical tapering of height away from Blaauwberg Road into the suburban hinterland beyond while encouraging the much needed densification of the corridor.	This detailed input is appreciated and the guidelines have been reworded.
89	Conceptual designations	Marine Circle	On page 61, Marine Circle is identified both in the District Node and Local Node categories – our opinion is that the District Node category is more suitable.	The Bayside and Marine Circle area has been designated as a district node in the 2022 draft
90	Urban Development	Projection Figure	On Page 70, the residential unit projection figures in table 6 don't seem to make sense. Some of the District figures in table 8 on page 72 also seem very high when compared to the City wide figures.	Thank you, this was an error which has been corrected.
91	Koeberg NPS Evacuation	Inclusion of KNPS restrictions under Sub-District	It is assumed that the inclusion of KNPS restrictions under Sub-District 2 (pg. 79 and 80) is a typo.	The 16km zone covers the northern portion of Sub-district 2, roughly above Sandown Road.
92	Transport and Route Design.	Amendment to pg. 862, Sub-District Plan 2	On page 86, Sub-District Plan 2, it appears that Malibongwe Drive is missing on the plan.	Thank you for pointing this out. It has been included.

Integrated District SDF and EMF Review: Comment on March 2021 Drafts

Nr	Comment summary/contents	District Plan Overall Theme/ Common Concerns	Response
B_250	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_251	Refer to lists of Common Comments	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_252	Refer to lists of Common Comments	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_253	Refer to lists of Common Comments	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_254	Refer to lists of Common Comments	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_256	Refer to lists of Common Comments	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_258	Refer to lists of Common Comments	Standard Concerns: C	Refer to 'List of Common Concerns'
B_259	Refer to lists of Common Comments	Standard Concerns: C	Refer to 'List of Common Concerns'
B_260	Refer to lists of Common Comments	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_261	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_262	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_263	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_264	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_265	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_266	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_267	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_268	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_269	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_270	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_271	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_272	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_273	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_274	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_275	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'

[illegible]

B_307	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_308	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_309	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_310	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_311	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_312.1	Refer to 'List of Common Concerns' Plus additional Point: Why not spending money on rezoning and structuring Dunoon and put in a decent infrastructure?	Site Specific	Refer to 'List of Common Concerns' Du Noon is an area of priority in the district. It is identified as a 'Vulnerable Area' in the Implementation Plan. This means it is identified and prioritised for additional local area planning work and investment.
B_313	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_314	Detailed Comment mainly relating to cycling and NMT, request for more detail of NMT interventions required	Site Specific	Please see detailed response in the Southern District responses (Comment reference: S_112), The request for more NMT interventions detail in Blaauwberg District SDF is noted.
B_315	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_316	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_317	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_318	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_319	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_320	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_321	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_322	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_323	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_324	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_325	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_326	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_327	Propose Wolwerivier is used for housing instead of Erf 1117.	Standard Concerns: Erf 1117	Noted, due to Wolweriviers' location far away from jobs and services it is not planned as an expansion area currently.
B_328	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_329	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_330	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_331	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_332	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_333	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_334	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_335	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'

[illegible]

B_367	Do not feel input at public meeting was included adequately as the plan still shows have to rely on possible future investments to address the major economic problems we have in Atlantis and the surrounding areas.	Site Specific	Atlantis and Atlantis Industrial are identified as priority areas in the Implementation Plan, which means they are highlighted for future additional planning and investment. However, the SDF focuses on giving a spatial vision. It does not include projects, budgets and programmes like the City's IDP.
B_367	We noticed in the draft plan efforts has been made to address our communities economic problems, and the ASEZ is a good project, but given social issues this will remain only a plan as there isn't a big enough draw card for Atlantis to attract local and foreign investors. Investors and Companies establish themselves here and not long then they close shop and relocate leaving many breadwinners unemployed. The reason many of them leave is because of travelling, no high end housing for them or their senior management and their families.		This is noted. The Atlantis Special Economic Zone is the main way the City is trying to attract and retain new businesses to the area. High-end developments in Atlantis are supported in principle and the SDF is enabling of more residential development in Atlantis.
B_367	We strongly believe if Silverstream Strand and the adjacent farm Springfontein can be developed to their full potential and be able to provide investors with up market housing and the related facilities will that be the catalyst for investors to bring their business to Atlantis CBD and to the ASEZ precinct, we are also confident many companies will even relocate to Atlantis. We need not explain what massive employment and business opportunities etc will be created within our communities and at the same time contribute towards addressing some of our social problems. However for some reason these development opportunities is low key on the draft special plan and we understand the environment should also be protected but in land use plans serious economic consideration should be given to poor and struggling communities so that their living conditions can improve after all we were "dumped" here.		Silverstreamstrand is identified as a local node in the SDF. Since the April 2021 public engagements the guidelines for Springfontein and Silverstreamstrand have been revised. Please refer to the guidelines for Sub-district 4: West Coast in Chapter 4. Balancing the need for environmental protection and new development is required.
B_368	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_369	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_370	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_371	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_372	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_373	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_374	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_375	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_376	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_377	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_378	Refer to 'List of Common Concerns'	Standard Concerns: C	See standard response C
B_378	Concern for security of conservation and open spaces as new high developments occur near them		Noted, protection of open spaces is dealt with by the land owners, typically the Environmental Management Department or the Parks and Recreation departments.
B_379	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_380	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_381	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_382	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_383	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'

B_384	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_385	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_386	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_387	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_388	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_389	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_390	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_391	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_392	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_393	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_394	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_395	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_396	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_397	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_398	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_399	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_400	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_401	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_402	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_403	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_404	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_405	Concerns about the terminology used in the DSDF, especially our intent for the areas labeled as 'New Urban Infill'. There also appear to be inconsistencies between the previous DSDF and the 2021 DSDF - such as the Silverstream environmental importance: "The City SDF webpage blatantly contradicts itself stating in one line that the SDF will Protect sensitive coastal areas, conservation and agricultural areas, yet intends to Develop Silverstreamstrand as a new mixed use coastal node."	Site Specific	Noted. Silverstreamstrand currently has a City resort developed on it. As part of the City's spatial transformation goals, more equitable access to the coast is pursued, particularly in previously disadvantaged areas. This includes development of a more complete coastal node, offering a wider range of opportunities on a contained built footprint. This should serve as a recreational node, and its development may result in tourism and job opportunities. Any environmental authorisations required will follow due process. The intention is for a limited built footprint, which would not have a far reaching impact on the sensitive environment, but improve public access and opportunities at the coast.
B_406	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_407	The comment relates specifically to Sectional Title properties and the Municipality's obligation to ensure compliance with the Sectional Title Schemes Acts. It appears that it would be in the Municipality's best interest to consult with a Sectional Title property specialist attorney to implement procedures and checks to ensure that the correct legally required resolutions and owners' approvals are being obtained for respective changes being applied to for changes to plans."	Site Specific	Recommendation appreciated, however, the SDF does not give or take away land use rights. It sets a vision and provides development guidelines. Changes in land use rights will require a separate process.
B_408	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'

B_409	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_410	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_411	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_412	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_413	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_414	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_415	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_416	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_417	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_418	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_419	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_420	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_421	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_423	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_424	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_425	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_426	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_427	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	A response to the issues raised is included in the 'List of Common Concerns'. Thank you for the considered nature of the letter.
B_428	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_429	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_430	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_431	The respondent is in support of increasing the density of Blaauwberg, however, they recommend it be done when there are enough services to carry the density sufficiently. They are also in support of upgrading the beachfront and including a local club/entertainment area.	Standard Concerns: C	Noted and generally agreed with.
B_432	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_433	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_434	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_435	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_436	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_437	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'

B_438	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_439	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_440	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_441	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_442	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_443	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_444	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_445	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_446	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_447	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_448	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_449	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_450	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_451	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_452	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_453	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_454	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_455	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_456	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_457	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_458	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_459	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_460	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_461	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_462	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_463	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_464	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_465	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_466	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_467	Refer to 'List of Common Concerns' Requests residential Analysis.	Standard Concerns: C	Refer to 'List of Common Concerns' A summary of the Land Use Model which was done for the city is included in the MSDF Annexures which is out for public comment.
B_468	Refer to 'List of Common Concerns'	Standard Concerns: C	

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B_1200	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1201	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1202	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1203	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1204	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1205	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_1206	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1207	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1208	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1209	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1210	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1211	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_1212	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1213	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1214	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1215	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1216	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1217	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1218	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1219	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1220	Refer to 'List of Common Concerns' Additional point: where is the detail regarding the beachfront in relation to it being developed into a business node in terms of the Spacial Development Plan?	Standard Concerns: C	Refer to 'List of Common Concerns' A local SDF is proposed to give more detailed guidance on this.
B_1222	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_1223	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1224	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1225	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_1226	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1227	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_1228	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1229	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1230	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'

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B_1294	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1295	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1296	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1297	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1298	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1299	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1300	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1301	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1302	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1303	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1304	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1305	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1306	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_1307	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1308	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1309	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1310	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1311	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1312	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1313	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1314	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1315	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1316	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1317	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1318	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1319	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1320	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1321	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1322	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_1323	Suggestions and encouragements re tourism potential of the coast in Blaauwberg		Thank you for the examples and encouragement. We agree that a careful approach is needed to maximise the potential in an inclusive manner. A local SDF is proposed for the beachfront area and we hope you will bring your ideas and insights to any public processes on the beachfront.

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B_500	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_502	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_503	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_504	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_505	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_506	Regulations need to be put in place to regulate dog walkers to pick up their dogs faeces, and fines to be issued if they do not.	SDF/EMF	Your frustration is noted, however, this is not an issue which a spatial development framework can address.
B_507	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_136	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_655	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_510	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_511	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_512	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_513	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_514	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_515	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_516	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_517	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_518	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_519	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_520	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_521	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_522	Concerns around the new development areas in Table View and Blaauwberg, traffic congestion and insufficient infrastructure to cater for low costing housing	SDF/EMF	Refer to 'List of Common Concerns'
B_523	Objection to the low costing housing proposed on the Table Bay Nature Reserve, due to noise, crime, drop in property value and protection of the nature reserve	SDF/EMF	No new urban development is proposed on proclaimed nature reserves in the district.
B_524	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_525	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_526	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_527	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_528	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_529	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_530	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'

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B_595	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_596	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_597	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_599	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_600	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_590	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_598	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_601	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_603	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_604	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_602	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_607	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_609	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_610	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_611	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_612	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_613	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_614	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_616	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_617	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_618	Refer to 'List of Common Concerns' 1. Density Enforcement: - Some 12 to 15 years ago the surrounding residents acquired a legal mandate in a court of law stating that this field adjacent to Blouberggridge Primary school would only EVER be developed to a density of 20 dwellings per hectare. - What has happened to this ruling? - This proposal in its current state overrules the previous decision (20 dwelling per hectare) that residents fought so hard in court to enforce.	Standard Concerns: E	The site has been changed to show as a New Development Area: Public Service.
B_621	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_622	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_623	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_624	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_625	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_626	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'

B_627	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_629	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_630	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_631	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_632	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_633	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_634	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_635	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_636	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_637	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_768	Where can we sign a petition for the development of erf 1117 into low cost housing	Site Specific	Your support for low cost housing is noted.
B_650	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_641	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_644	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_645	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_646	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_35	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_648	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_649	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_16	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_652	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_653	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_654	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_105	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_656	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1068	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_660	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_661	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_662	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'

B_663	Increase in population and the relation of persons per plot size and the impact thereof on infrastructure. There will be no control with regard to the type, size and shape of top structures. Road and taxi concerns as people would need transport into the city as there are limited employment opportunities within the area. Furthermore, there is a concern with regard to the decrease in property values and an uncontrollable site	SDF/EMF	No specific detailed site development plan is being advertised in this SDF so the questions posed cannot be answered as there is no detailed site layout. If new development rights are applied a land use application will be required and due process followed. During this process, departments provide input on the development and what additional development controls are needed to mitigate any negative consequences, and the public can give input too.
B_664	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_666	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_667	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_668	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_669	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_670	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_671	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_672	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_673	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_674	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_675	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_676	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_677	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_678	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_679	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_680	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_681	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_682	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_684	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_687	Refer to 'List of Common Concerns'	SDF/EMF	Refer to 'List of Common Concerns'
B_688	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_689	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_690	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_691	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_692	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_693	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_694	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_695	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'

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B_729	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_730	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_731	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_732	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_733	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_734	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_735	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_736	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_737	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_738	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_739	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_740	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_742	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_743	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_744	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_745	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_746	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_747	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_748	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_749	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_750	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_2	Using land for low-cost housing next to the R27 & Tablebay mall will prove to be a mistake. Generally can't have low-cost housing estates far removed from middle & upper income - & better located areas where good opportunities exist - as these estates become / underpin the continuing legacy of slums & life chances for its people. Must have residential mixing - as has proved successful through strategies in Ireland - through private developers providing market housing (for profit) but inclusive also of a component of (free/subsidised) social housing.	Standard Concerns: Erf 1117	While things are seldom as simple as one may make them out to be you certainly make a valid & valuable point. We in City planning generally agree – at least in principle – with the sentiment / approach. How this transpires into action is however a real challenge. We hope some of the policy statements in these reviewed 1st draft SDFs do begin to speak to this. There is an 'Inclusionary Housing' policy which is busy being drafted by the City which essentially addresses your central point – that we require greater integration, greater access to well located housing, & an imperative that the private sector play a greater role in doing this. The many obstacles & technicalities in preparing this policy has meant it is taking (a lot) longer in materialising than envisaged – but it is on its way to beginning to support precisely what you propose - although scale & the enormity of the challenge will mean it is unlikely on its own to make a substantial dent in things on its own and should rather be seen as one part of a solution. Thank you for the ideas, case studies and enthusiasm in this process and document
B_4	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_5	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_6	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'

[illegible]

B_37	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_38	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_39	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_40	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_41	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_42	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_43	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_44	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_45	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_46	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_47	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_48	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_49	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_50	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_51	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_52	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_53	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_54	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_55	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_56	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_57	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_59	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_60	Refer to 'List of Common Concerns'; Please can you keep me up to date on any decisions made in this area?	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'; You will be added to our public participation database for the DSDF process.
B_62	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_63	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_64	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_65	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_501	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_67	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_68	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'

B_69	Lack of Educational Facilities in Erf 1117 area	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'. Need for schools noted. Schools are not a City mandate. The Western Cape Education Department is responsible for schools and the comment will be sent to them.
B_70	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_71	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_72	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_73	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_74	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_75 - B_75.3	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_76	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_77	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_78	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_79	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_80	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_83	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_85	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_86	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_790	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_88	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_90	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_91	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_92	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_95	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_121	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_96	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_97	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_98	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_99	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_100	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'

B_101	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_102	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_103	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_104	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_106	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_107	Support TOD in principle. The bottom line is, yes TOD can work and yes there is a need for proper lower income housing done the right way with the planning and infrastructure put in place beforehand. But please, make sure this planning (both operational and financial) is done and this framework is not just pushed through to appease supporters. Get a full understanding of the financial impact this will have on the Blaauberg region. Government will not be able to support it alone. Residents and visitors will no longer be providing government with the necessary funds as they will be gone. The remaining new residents will not be able to be taken care of properly by the government and they themselves will become the ones that suffer, possibly even worse than their current conditions.	Standard Concerns: Erf 1117	We agree on the principle of TOD and good settlement planning which includes infrastructure and community facilities. These are elements that have been considered and will continue to be pursued in planning an inclusive and prosperous city. Thank you for your considerations and input into the process.
B_108	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_109	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_110	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_111	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_112	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_113	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_114	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_115	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_116	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_117	Open field along Wessels Road - High density development. There is currently limited access to and from Blouberg Ridge Primary School which means severe traffic during peak school times and would be worsened by increased development. Lack of adequate infrastructure to support the development, what about sewage, traffic management and public facilities.	Site Specific	The development requires impact on existing services to be considered as part of the land use application process. Traffic impacts are studies and the transport department recommends development controls and measures to mitigate negative impacts. This is standard procedure.
B_119	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_120	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_94	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_122	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_124	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_127	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_128	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'

B_129	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_130	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_132	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_133	The designation of the Vissershok Waste Disposal Facility (EnvironServ) be changed to that of a Landfill Site. It is currently shown as a "Buffer Area"	Site Specific	Thank you, It has been amended to show as a landfill site.
B_134	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	
B_789	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_761	Refer to 'List of Common Concerns'	Site Specific	Refer to 'List of Common Concerns'
B_138	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_139	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_140	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_142	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_143	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_144	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_145	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_146	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_147	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_148	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_149	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_150	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_151	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_152	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_153	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_154	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_155	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_156	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_157	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_158	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_159	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'

B_193	Refer to 'List of Common Concerns'; beach pollution management issues raised	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'; concern noted, beach pollution and waste management are operational issues and cannot be dealt with in the District SDF which is concerned with long term spatial planning.
B_194	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_195	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_196	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_197	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_198	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_199	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_200	Refer to 'List of Common Concerns', Safety and Security concerns if development of Erf 1117 goes ahead	Standard Concerns: Erf 1117	Replied via email too explaining the DSDF has not proposed a new informal settlement, and that we don't have a petition to send. As the drafters of the policy document we support it.
B_201	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_202	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_203	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_204	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_205	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_206	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_208	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_209	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_210	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_211	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_212	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_213	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_214	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_215	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_216	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_217	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_218	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_219	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_220	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_221	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_222	Please refer to Table Bay Comments and Responses (comment reference: TB_6)	Site Specific	Please refer to Table Bay Comments and Responses (comment reference: TB_6)
B_223	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'

B_224	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_225	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_226	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_14	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_163	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_229	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_230	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_231	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_232	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_233	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_234	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_235	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_236	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_237	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_238	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_239	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_240	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_241	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'; The proposal is for a mix of different housing types, including market.
B_242	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_243	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_244	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_245	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_246	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_247	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_248	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_249	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_977	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_978	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_979	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_980	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_255	Lack of educational facilities	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'. Need for schools noted. Schools are not a City mandate. The Western Cape Education Department is responsible for schools and the comment will be sent to them.

B_981	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_982	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_983	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_984	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_985	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_986	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_987	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_988	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_989	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_58	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_266	The elements that come with the proposed settlement with increase crime in our area as well as affect my work directly as a rental agent	Standard Concerns: Erf 1117	Comment noted and disagreed with. Refer to 'List of Common Concerns'
B_990	In overall support of the DSDF but do not support the proposals in the Blaauwberg Area wrt medium sized developments	Standard Concerns: Erf 1117	Comment noted. Refer to 'List of Common Concerns'
B_82	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_991	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_992	Concern over lack of detail for Erf 1117 guidelines. Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	More detailed planning is appropriate at a site level not at the district level. This document provides guidelines to inform more detailed planning.
B_993	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_994	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_274	Why don't they sort out the necessary/important things first for the existing residents before squashing in thousands of more people ? In the past all our objections were just ignored. We all pay our rates and taxes and the people who don't always get heard	Standard Concerns: Erf 1117	Your frustration is noted. The City is working to build and maintain infrastructure and other services within a limited budget and due process. Progress is often slower than we would all like it to be, however we are committed to realising the necessary services and infrastructure.
B_275	It's so typical of Africa. Turning the only place where one can get the iconic view of Table Mountain into a filthy cesspool instead of preserving it and marketing and making money from it. No sense whatsoever. What I would like to know is the date for when this stupid plan will go ahead. I would like to sell my property in Sir David Baird Drive before it becomes worthless.	Standard Concerns: Erf 1117	Your frustration is noted. A vision for an integrated, inclusive and vibrant new development area is being proposed. More detailed planning is appropriate at the site level, rather than the district level. The district SDF proposes development guidelines which will inform site level planning. Due processes will need to be followed and you will be able to comment on a development proposal through the development management process at a later stage.
B_276	Refer to 'List of Common Concerns'; Current air pollution concerns	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'; The spatial development framework is not able to address operational current operational issues such as burning of plastic. Please log a service request through the City's official platforms e.g.. telephone hotline to report fire incidence or request law enforcement.
B_995	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_996	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_997	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_998	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_999	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1000	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1001	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'

B_1002	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1003	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1004	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1005	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_289	Proper analysis still needs to be carried out and/or made public and all impacts need to be considered before submission for approval	Standard Concerns: B	The SDF proposes a vision and development guidelines. A specific development proposal is not included here as that would require separate more detailed planning.
B_1006	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1007	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1008	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1009	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1010	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1011	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1012	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1013	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1014	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1015	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1016	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1017	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1018	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1019	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1020	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1021	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1022	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1023	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1024	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1025	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1026	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1027	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1028	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1029	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1030	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1031	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'

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B_1062	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1063	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1064	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1065	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_1066	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1067	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1069	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1070	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1071	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1072	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1073	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_1074	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1075	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1076	Standard Comment D	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1077	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1078	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1079	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1080	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1081	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1082	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1083	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1084	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1085	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1086	No employment opportunities other than Killarney Gardens, Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Concern over housing without job opportunity is shared. The guidelines for Erf 1117 are for a mixed use development. This is intended to include job generating development too. Refer to 'List of Common Concerns' for more detailed responses.
B_1087	The short term benefits of low cost housing seem like a good idea, even more so for the political parties trying to garner votes by driving this project, especially so close to elections. However, the long term ramifications are far and extensively reaching.	Standard Concerns: Erf 1117	A vision for an integrated, inclusive and vibrant new development area is being proposed. The long term ramifications of this are expected to be positive. More detailed planning is appropriate at the site level, rather than the district level. Please note all due processes will need to be followed and these include opportunities for the public to comment.
B_1088	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1089	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1090	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_36	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'

B_1091	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1092	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1093	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1094	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1095	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1096	I am really concerned about an option for low-cost housing, not even mentioning a market for a settlement area. This area should remain a high-end market as this is not a low-cost area and we paid hefty prices to live here. I am scared to ride my bicycle along Big Bay Boulevard/Berkshire Road as it is at the moment with the Happy Valley community staying across from Sunningdale. There have been complaints of stones thrown at vehicles in the recent past as well.	Standard Concerns: D	Your concerns are noted. Integration is key principle of the future development vision, this needs to be done sensitively and with good urban design for it to be successful. A vision for an integrated, inclusive and vibrant new development area is being proposed. The long term ramifications of this are expected to be positive. More detailed planning is appropriate at the site level, rather than the district level. Please note all due processes will need to be followed and these include opportunities for the public to comment.
B_1097	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1098	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1099	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1100	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1101	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1102	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1104	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1105	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1106	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1107	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1188	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1108	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1109	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1110	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1123	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1111	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1112	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1113	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1114	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1115	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1116	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_1117	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'

B_1118	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_1119	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1120	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_1121	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_184	There is no clear definition of what affordable housing means or subsidy housing opportunity means.	Standard Concerns: Erf 1117	A definition has been added.
B_750	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_751	Refer to lists of Common Comments	Standard Concerns: B	Refer to 'List of Common Concerns'
B_752	Refer to 'List of Common Concerns'; Shortage of schools/clinics in Sunningdale area	Standard Concerns: B	Refer to 'List of Common Concerns'; Noted. A new node is proposed in Sandown at the Parklands/Broad Road and Sandown Road intersection and land is being set aside for a public health facility. The Western Cape Education Department is responsible for schools. Two public school sites are also being set aside for the later stages of the River gate development, among other private schools. The WCED is responsible for design, construction and operation.
B_753	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_754	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_755	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_756	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_757	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_758	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_759	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_760	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_137	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_762	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_763	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_764	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_765	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_766.1	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_766.2	We request the City Council to ensure wide public participation where ever local spatial development is planned.	Process	Noted and agreed with.
B_766.3	The water pressure in Big Bay where we live is already insufficient and under constraints.		The City implements pressure management as a water saving measure. This is continuously (daily) being adjusted. Should you experience excessive pressure issues please log a service request with the City to attend to it.
B_766.4	Together with increased density in human population pets and especially dogs will follow and this will lead to "dog hunting" in the neighboring Nature reserve.		Nature reserve and ecological security is considered by the nature reserve management.
B_15	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_769	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_770	Planning insufficient if not followed by implementation	Implementation	Agree, a major change from the 2012 DSDF is that the Implementation plan has been vastly expanded and detailed to aid in prioritisation and implementation.

B_770	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_771	Why has this proposed developments been kept so quiet and such little time given to object?	Process	The SDF process has been extensively advertised. There was public participation on the Baseline documents and 2 rounds of public participation on the draft SDF documents. This is a total of at least 180 days in which to give input since 2019.
B_772	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_772	Weekends and holiday periods attract a huge influx of visitors to this area. By increasing the density of residents and allowing for usual influx of non-residents, the amount of usual traffic, taxi, informal trading sector and vagrancy simply increases exponentially. The City has been and remains unable to curb growth of vagrancy, traffic recklessness, crime etc in this area. How on earth will they manage with further expansion?		New development is required to increase the supply of housing in Cape Town, and provide space for economic opportunities . New development is subject to infrastructure capacity, which includes transport. The informal sector is an important sector of the economy. Traffic recklessness, vagrancy and crime are important issues which deserve attention, but a spatial framework does not address these. Vagrancy and crime are transversal issues which are the remit of, inter alia, social development, urban management and law enforcement agencies.
B_773	If there was a nuclear incident at Koeberg Power Station how would the many residents of a high density low cost development get themselves to safety. Where would they be housed until it was safe to return? If they were ever able to return.		This is the responsibility of Disaster Risk Management. New residential development is subject to demonstration that the emergency plans will not be negatively impacted. The household characteristics and estimated car ownership levels are considered in regulating development and formulating emergency plans.
B_773	There should only be business and schooling development in this area providing employment and education to residents already living here until the infrastructure is vastly improved and Koeberg power station is decommissioned.		New development is subject to infrastructure capacity and furthermore can improve the financial viability of new infrastructure through development contributions and increasing the revenue available for maintenance in the future. New development also has to comply with disaster risk management measures to mitigate the risk of being in the 16km radius of Koeberg Nuclear Power Station.
B_773	Refer to 'List of Common Concerns'		Refer to 'List of Common Concerns'
B_774	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_776	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_777	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_777	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_778	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_779	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_780	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'

B_781	There cant be more housing built up until the sewerage system is upgraded. Everyday the current system overflows into streets as it cannot cope with the current number of houses and apartments in the area table view/ parklands	Subdistricts	New development is subject to infrastructure capacity being available. Overflows in this area are not due to insufficient capacity (e.g.. pipes too small) but rather the system being misused (e.g.. foreign objects in the system) which causes a blockage, and also wear and tear. Pipe replacement work is ongoing, albeit at a slower pace than we would all like to see due to operational and resource limitations.
B_782	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_782	Tried cycling but route too dangerous		Noted, safety and security is a complex issue. Good design along cycle routes (lighting, activity, passive surveillance from windows) can assist and guidelines to encourage this are included in the SDF. However, the operational aspects of safety (patrols etc.) are not something an SDF can deal with.
B_783	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_784.1	Refer to 'List of Common Concerns'		Refer to 'List of Common Concerns'
B_784.2	The information the city did publish in terms of this current process was not adequately distributed. The links provided on the Facebook posts were broken. It went to some university site in the USA and indicated it was a Phishing attempt. When I used the search function on the website, it failed to locate the documentation. It took more than a week for me to receive a reply from the official email address with the Planning documents for Blaauwberg. I do not believe that constitutes an adequate process. In comparison, I receive an SMS with my municipal bill amount within 2-3 days after month-end. The city could have utilised the same SMS functionality to send the Document links to all ratepayers.	Process	Your experience of the public engagement is not what we aimed for and we are sorry for the disappointment. We have taken note of these issues to avoid them in our future public engagement processes. Thank you for the feedback. The shortened URL was unfortunately hacked and a new one was sent out and replaced on digital platforms when we were made aware. Due to POPI Act we cannot use the rates database to sms residents. However, we have tentatively added all email addresses and cellphone number which were submitted as part of this process to a Spatial Planning database for communication regarding this process.
B_785	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_786	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_787	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_788	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_789	More urban space for open air activities in Summer and sheltered activities in Winter is needed on the West Coast	Subdistricts	Request for more usable public urban space is noted and supported.
B_789	Issue: Many homeless people needing assistance		This is a complex issue which is primarily the mandate of the department of social development. The SDF is limited in its scope to address this issue. Land for potential new development for housing has been identified.
B_87	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_791	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_792	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_793	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_794.1	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_794.2	A public presentation was advertised in the Tabletalk (local newspaper) was to be held at Atlantic Beach Estate on 22 April 2021 at 5.30 pm. This did not take place	Process	The meeting did take place, however the venue was changed to the Milnerton Sub council Chambers due to the Atlantic Beach Estate Venue not being too small in terms of Covid-19 social distancing protocols. This was regrettably only picked up near to when the meeting was scheduled. Three other public engagements were held for the Blaauwberg District, as well as a narrated presentation being available on the City website, and this dedicated email address for commenting.

B_795	Area feels unsafe when running early in morning	Standard Concerns: Erf 1117	Noted, safety and security is a complex issue. Good design along cycle routes (lighting, activity, passive surveillance from windows) can assist and guidelines to encourage this are included in the SDF. However, the operational aspects of safety (patrols etc.) are not something an SDF can deal with.
B_796	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_797	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_798	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_799	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_799	The land could be put to better use by building a new SAPS station.	Standard Concerns: Erf 1117	Suggestion noted. The DSDF Suggests that the site could be used for a variety of uses. The site is in excess of 200 ha and a police station typically requires less than 5ha so that is a possibility from a land perspective. The location, budget and operation of SAPS is a national government mandate.
B_800	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_801.1	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_801.2	Urban management issues around Big Bay informal settlement: animals in the road; children not in school and on the road edge - safety concern		These are operational issues which will be referred to the relevant departments. The SDF cannot solve operational issues like this as it has a different focus.
B_802	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_803	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_804	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_804	Would support a Conradie Style developmetn on Erf 1117	Site Specific	Noted and supported, a mixed use and mixed-income development is suggested in the DSDF.
B_805	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_805	We do not have an adequate police dept, Law Enforcement are understaffed, there are not enough solid waste vehicles to adequately maintain the areas and bins are often left overnight, which increases the mess as the vagrants dig in bins and simply throw their litter on the streets, they are not prepared to go to shelters and the entire issue is simply overlooked.		Noted and will be referred to line departments as the SDF is concerned with spatial planning.
B_806	Would like to see entry level housing which is contextually appropriate, tourism and a range of civic and social facilities (court, fire department, vehicle licensing facility, schools,)on Erf 1117, including a govt old age home	Site Specific	This vision is generally shared by the planning department and indicated in the site guidelines for Erf 1117. A new civic node is proposed in Sandown/Rivergate for public facilities.
B_806	Have given this input previously and not seen it be implemented.	Process	The district SDF gives describes the general vision and guidelines for the entire Blaauwberg area. The previous engagement was likely part of the EIA scoping which was done for only Erf 1117. That will inform further environmental processes which may be required as part of planning for the site. Thank you for being an engaged member of the public in both of these processes!
B_807	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'; Please note the map attached to your email is a locality plan for Erf 1117. This public participation process is about the Spatial Development Framework for the entire Blaauwberg District, not only Erf 1117. Your comments relating to Erf 1117 are noted.
B_808	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_809	Numerous concerns including that there is no detail on the suggestions for Erf 1117 in the document, that employment is not considered with new housing areas, and that safety plans relating to KNPS are not considered/mentioned in the document.	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'. The district SDF does not go into site level design and planning, as it gives the vision for the whole area, and is not a site specific development proposal/application. A key strategy of the DSDF is to plan for employment. Detailed and extensive guidelines and references are made to the safety aspects of the KNPS emergency evacuation plans - refer to pages 50 - 52 of the 2021 advertised draft.
B_810.1	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'

B_810.2	Suggest Erf 1117 developed as market housing, social housing, some commercial property and the facilities to support these housing sectors	Site Specific	This vision is generally shared by the planning department and reflected in the guidelines for Erf 1117.
B_811	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_811	This area was always supposed to be mostly nature reserve which many residents love about the area. It is a bit short sighted and unfair for the council to destroy this.		While there are various nature reserves and conservation areas in the district, Erf 1117 is not a proclaimed nature reserve. The guidelines for the site suggest a large portion of the site is included into the adjacent nature reserve.
B_812	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_813	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_850	Standard: Argues there is bias to mass densification of the area.	Standard Concerns: E	Refer to 'List of Common Concerns'
B_851	Standard comments with some additional: - The Coastal Economic and Spatial Framework (CESF) for Cape Town will be negatively impacted - The concern and impact of homeless and unemployed persons will further increase and burden the City of Cape Town - This area is not within the Urban inner core nor near sufficient and major work opportunities or transport links - The burden on the tax payers to properly establish and manage this development in line with the required standards applicable to all the other established suburbs will not be achievable	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'; The CESF and DSDF have been aligned, the proposals in the DSDF aim to enable economic and housing opportunities to be developed, these are mitigating actions against people becoming homeless. It is not necessary for the area to be in the Urban Inner Core, it is in the 'Consolidation area'. There are many examples of well managed development, and this will be the responsibility of the landowner.
B_852	Common issues, with some additional: - The Coastal Economic and Spatial Framework (CESF) for Cape Town will be negatively impacted - The concern and impact of homeless and unemployed persons will further increase and burden the City of Cape Town - This area is not within the Urban inner core nor near sufficient and major work opportunities or transport links - The burden on the tax payers to properly establish and manage this development in line with the required standards applicable to all the other established suburbs will not be achievable	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'; The CESF and DSDF have been aligned, the proposals in the DSDF aim to enable economic and housing opportunities to be developed, these are mitigating actions against people becoming homeless and must be considered both in the urban inner core and in the consolidation area. There are many examples of well managed development, and this will be the responsibility of the landowner to execute.
B_853	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_854	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_855	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_856	Objections to spatial development plan	Standard Concerns: C	Refer to 'List of Common Concerns'
B_857	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_858	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_859	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_860	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_861	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_862	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'

B_863	Object to the plan; This proposal is incomplete and shows bias to mass densification of the area; In 30 years since I moved to Table View alot has changed, mostly for the worst; ; The plans to build high density dwellings please be put to a stop; Look after the people. If anything remove the squatter camps and build house for these people. They like so many deserve a safe and warm place to stay. Make it affordable. Everyone should pay rates and taxes but consideration should put into place. Please do not build low cost, high density, affordable houses along the beachfront, leave the value alone. Residents have invested in their houses and the value will plummet. You will be damaging our beachfront. Leave marine circle and Blaauwberg road alone. With companies closing why build office blocks and why build low cost houses...no building should be happening until the pandemic is over. Stop putting strain on the area. FYI...think about why the pandemic is still happening... high density area. The pandemic alone is a reason to not build high density. Insufficient Infrastructure	Standard Concerns: C	Your concerns are noted. Densification is one of the ways cities can accommodated a growing population. Densification makes more efficient use of valuable land, and allows a more contained urban footprint, thus limiting impact on adjacent critical natural assets and agricultural land. Density decreases infrastructure costs in the long term, as the City can focus on servicing a more compact network. Infrastructure and social services are considered by the City in density proposals. Please also note that the DSDF is a district level vision, it is not a specific development application and does not give or take away any land use rights.
B_864	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_865	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_866	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_867	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_868	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Response to acknowledge strong opinions on plans and criticism on failure of process and views for high density low cost
B_869	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_870	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_871	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_872	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_873	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_874	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_875	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_876	Refer to 'List of Common Concerns' Concern of impact of low cost housing on malls. Suggest protecting business and beaches should take preference.	Standard Concerns: E	Refer to 'List of Common Concerns', Planning for economic opportunity is one of the three strategies of the DSDF. The priority of the state is to increase housing opportunities close to areas of opportunity as the demand far outstrips supply. The goals of housing, conservation and business are not mutually exclusive. The priority is to afford more opportunities for more people to access the benefits of the area, including the recreational, economic and educational services intervening to ensure some of these opportunities are affordable is key to the City's aol of inclusion.
B_877	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_878	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_879	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_880	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_881	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'

B_882	Supports low cost housing on Erf 1117 as a form of restitution. Finds most of the reasons put forward by ratepayers associations against Erf 1117 not to be valid - suggests infrastructure, schools etc are adequate and queries why issues re Koeberg are only raised as a problem now. Density in the adjacent gated complexes has not been a problem - why density a problem now. Suggests new development should be gated as per surrounding Blaauwbergstrand and that it include a homeowners constitution, provisions of which are also suggested.	Site Specific	Your support for low cost housing in the area is noted and supported; that access to opportunities is restricted to South African citizens only is beyond the scope of this process.
B_883	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_884	Several general concerns with some specifics on: - limited serviceability from the My City at present - Access to public healthcare far away - Policing - Non Existent presently - Concern for traffic congestion and commuting - Concern for extra load on Potsdam sewage plant - Backyard Dwelling implications for development	Standard Concerns: C	Concerns noted and many of these frustrations are shared. The DSDF proposal contains our best attempt to stop these issues getting worse in the future, and hopefully address some of them through planning future development. Backyarding is assumed in calculations of future growth. Please refer to the 'List of Common Concerns' too. A provincial health facility is in the early planning phase for the area, this is the Western Cape Health Department responsibility.
B_885	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_886	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_887	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_888	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_889	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_890	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_891	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_892	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_893	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_894	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_895	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_896	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_897	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_898	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_899	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_900	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_901	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_902	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'

B_903	Standard comment, plus additional: 1. Sensible conversations must be held between government and home-owner associations and representatives of this area. 2. Mixing of low cost housing into an established environment will degrade the area and WILL PUT A HOLD OF ANY FOREIGN INVESTMENT for South Africa of any type. 3. There are many other areas that can sensibly cater for requirements of housing. 4. The nuclear 2nd zone definition stretches beyond the proposed plans. 5. By degrading at least 10,000 properties by R1.5m each takes R15 billion out of the economy. 6. The infrastructure to this area is non-existent. a. MyCiti cannot be extended here as we all know what happened to MyCiti in Dunoon. b. Roads are insufficient. c. Same for water and drainage. d. Same for sewerage. 7. Main objection - Proper town planning development has not been done ... schools, hospitals, sport facilities, etc.	Standard Concerns: C	The DSDf gives a development vision and guidelines to achieve it. It is not a development proposal for a specific site and does not give or take away land use rights. Consultation and an opportunity to comment is part of due process which will need to be followed by the land owner of any development, including Erf 1117. Refer to 'List of Common Concerns'
B_904	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_905	Concerned by proposal for mass densification.	Standard Concerns: E	Most of the issues raised are addressed in the list of 'Common Concerns'. The planning team considers densification contextually so it will need to be appropriate for the area, and subject to infrastructure capacity. The inputs of residents have been noted and the draft has been revised with these in mind.
B_906	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_907	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_908	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_909	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_910	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_911	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_912	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_913	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_914	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_915	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_916	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_917	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_918	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'

B_919	Comment raises two major issues: - Critique on process and communication of SDF process for public participation and request for WhatsApp NewsGroups "The information was sparse and included unrelated bits of info that just raised emotions...Can someone please investigate how to use the whatsapp newsgroup offering and implement it properly" - Protection of Erf 1117: "My plea would be that not only should the development of the area take into account the constraints/ challenges/ opportunities around infrastructure, safety, transport, environment, social integration and economic development BUT most importantly that whatever is agreed, will continue to honour this very unique corner of South Africa (historically & as a destination) and create an environment for all to flourish, to be safe and to feel part of a community"	Process	Approaches to improve communication are being explored and the document is being released for another round. Refer to "List of Common Concerns" regarding Erf 1117.
B_920	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_921	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_922	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_923	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_924	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_925	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_926	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_927	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_928	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_929	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_930	Refer to 'List of Common Concerns'	Standard Concerns: B	Refer to 'List of Common Concerns'
B_931	Refer to 'List of Common Concerns' and - The Coastal Economic and Spatial Framework (CESF) for Cape Town will be negatively impacted - The concern and impact of homeless and unemployed persons will further increase and burden the City of Cape Town - The burden on the tax payers to properly establish and manage this development in line with the required standards applicable to all the other established suburbs will not be achievable	Standard Concerns: C	Refer to 'List of Common Concerns' and - The Coastal Economic and Spatial Framework (CESF) for Cape Town and the DSDF are aligned. - The development proposals include both job generating and residential development - The land owner/developer will be responsible for the costs and management of development.
B_932	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_933	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_934	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_935	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_936	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_937	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_938	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_939	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'

B_940	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_941	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_943	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_944	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_945	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_946	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_947	Supports densification and development as this is linked to the economy of the area. Must be done taking impacts on services etc into account. New development should consider the impact on residents and tourism. Suggestions to leverage the unique destination - upgrade of the promenade, introduce entertainments area near the beach with restaurants, beach bars, kids areas, lock up key facilities for kite surfers, support for complementary activities like surfing etc. Any developments to bring poorer people to the area should include efforts to integrate them into the community, including support to find work and be able to afford the cost of living and rates/taxes associated with the area.	Vision	These suggestions are supported. There are specific guidelines relating to the beachfront upgrade and a in the Implementation Volume there is a proposal to finalise a beachfront local area plan to guide its upgrade and future development. The 'node' on the map, around Marine Circle/Bayside area, is where we see the entertainment area progressing, building on the activity that is already there.
B_948	Flamingo Vlei common concerns about public housing impact on property value, area maintenance, taxis and informal trade.	Standard Concerns: C	Refer to 'List of Common Concerns'
B_949	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_950	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_951	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_952	Standard comments with some additional: - Lack of clarity with mixed use, Proposal does not show that a proper analysis has been done.	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'; There is a definition of mixed-use in the terms and definitions of Volume 4: Annexures. Proper analysis has been carried out, as described briefly in Chapter 1 of the DSDF and in detail in the accompanying Volume 1: Baseline and Analysis Reports which were also put out for public comment prior to formulating proposals.
B_953	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_954	Objection to low cost housing	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_955	Objection to low cost housing	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_956	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_957	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_958	Objection to low cost housing	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_959	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_960	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_961	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_962	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_963	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_964	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_965	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_966	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'

B_967	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_968	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_969	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_970	Refer to 'List of Common Concerns'	Standard Concerns: D	Refer to 'List of Common Concerns'
B_971	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_972	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_973	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_974	Refer to 'List of Common Concerns'	Standard Concerns: E	Refer to 'List of Common Concerns'
B_975	Refer to 'List of Common Concerns'	Standard Concerns: Erf 1117	Refer to 'List of Common Concerns'
B_976	Refer to 'List of Common Concerns'	Standard Concerns: C	Refer to 'List of Common Concerns'
B_61	The inclusion of properties along the Old Darling/Mamre Road/Rygersdal Extension/R 304/ Saxonwald Road and Klein Dassenberg Road, as earmarked in the Klein Dassenberg Smallholders Development Framework to be moved back into the Urban Edge	Site Specific	This matter has been considered and the urban edge has not been changed. The reasons include that the area to the east of the R304 is part of the 'Areas of Agricultural Significance' as determined by the Department of Agriculture and urban development is discouraged there; and that there is adequate land for expansion of Atlantis within the urban edge. The City is pursuing a 'compact' city growth pattern. The Klein Dassenberg Smallholding Policy is proposed to be withdrawn as part of the DSDF review, and relevant land use guidelines have been included into the DSDF main document in sub-district 5.
B_123	Possibility of including their properties into the Atlantis Urban Edge to enable development	Site Specific	This matter has been considered and the urban edge has not been changed. The reasons include that the area to the east of the R304 is part of the 'Areas of Agricultural Significance' as determined by the Department of Agriculture and urban development is discouraged there; and that there is adequate land for expansion of Atlantis within the urban edge. The City is pursuing a 'compact' city growth pattern. The Klein Dassenberg Smallholding Policy is proposed to be withdrawn as part of the DSDF review, and relevant land use guidelines have been included into the DSDF main document in sub-district 5.
B_125	Request inclusion of Monterey Farm (Portion 67 (a portion of portion 17) of the Farm Klein Dassenberg No. 20) into the urban edge (27 ha)	Site Specific	This matter has been considered and the urban edge has not been changed. The reasons include that the area to the east of the R304 is part of the 'Areas of Agricultural Significance' as determined by the Department of Agriculture and urban development is discouraged there; and that there is adequate land for expansion of Atlantis within the urban edge. The City is pursuing a 'compact' city growth pattern. The Klein Dassenberg Smallholding Policy is proposed to be withdrawn as part of the DSDF review, and relevant land use guidelines have been included into the DSDF main document in sub-district 5.
B_135	Request inclusion of property into urban edge: Denne-dreef Farm (Portion 18 (a portion of portion 20) of the Farm Klein Dassenberg No. 20) property size 8.5 Hectares.	Site Specific	This matter has been considered and the urban edge has not been changed. The reasons include that the area to the east of the R304 is part of the 'Areas of Agricultural Significance' as determined by the Department of Agriculture and urban development is discouraged there; and that there is adequate land for expansion of Atlantis within the urban edge. The City is pursuing a 'compact' city growth pattern. The Klein Dassenberg Smallholding Policy is proposed to be withdrawn as part of the DSDF review, and relevant land use guidelines have been included into the DSDF main document in sub-district 5.
B_131	This comment was used as a basis for formulating a list of common concerns. Please refer to that list for a summary of points raised and the responses.	Standard Concerns: D	This comment was used as a basis for formulating a list of common concerns. Please refer to that list for a summary of points raised and the responses.

B_180	Concerns relating to the scale of densification and required infrastructure and services. Note Koeberg is built in an area which experiences earthquakes and concern of ability to withstand high richter-scale incident.	Standard Concerns: D	Refer to 'List of Common Concerns'; The operational and physical safety precautions of Koeberg are managed by Eskom and strict international nuclear regulations. Comment will be passed on to Eskom too
B_1124.1	Request the urban edge is realigned to its 2012 position, which includes Farm 141 Morning Star. Based on approved Frankendale development (large industrial) south of Morning Star bringing large employment and development to area and unlocking Atlantis corridor; Van Schoorsdrift N7 exchange providing good highway access; previous policy positions and detailed studies undertaken for Farm 141; population growth suggests not all new development can be infill and densification and large new development areas are required in a city; spatial transformation - that there are higher order transport routes and new industrial development planned in close proximity; the majority of site has low biodiversity value as per botanical study and so is appropriate for urban development; Engineering study of 2017 for Farm 141 details there is no existing water or sewage supply to area, new connections will be closer once Frankendale comes online. Heritage study of 2016 shows there are some heritage elements on site but not extensive nor under formal protection.	Site Specific	Noted. This has been considered and the urban edge remains as proposed in the 2021 draft for the following reasons: the city is pursuing a compact urban form which is more sustainable from an operational, financial and ecological perspective as per the 2018 MSDP; further large scale development of the urban edge into the nuclear emergency planning zones is discouraged in line with international best practice, the relevant nuclear stakeholders and City policy; the City's population and land use modelling process estimates that there is sufficient land within the proposed urban edge to accommodate development on a 10 year time horizon, as is the time frame of this policy; the District SDF is reviewed on a 10 year basis.
B_1124.2	Suggest the proposed 2021 urban edge is unsustainable due to providing minimal provision for urban expansion in the district, not supporting the Atlantis development corridor, not taking the large number of employment opportunities to be generated at Frankendale (890 320 sqm of Industrial GLA) into account (1800 - 25000 employment opportunities) and the need for housing nearby; farm 141 is not high value agricultural land nor conservation land.		Noted. The City's land use modelling process estimates that there is sufficient land in the urban edge to accommodate development demands up to 2040.
B_1124.3	Suggest Farm 141 Morningstar west of the N7 is shown as a new development area, instead of 'biodiversity and open space network', based on baseline botanical study of 2015.		Noted. Due to reasons detailed in B_360.1 the urban edge has not been altered and Farm 141 is therefore not included as a new development area.
B_1124.4	Suggest portion east of N7 is shown as Biodiversity and Open Space		Noted, the biodiversity and open space layer updates are ongoing.
B_1124.5	Request opportunity to present previously compiled specialist studies to spatial planning department during process		Further meetings will be supported during the advertising period.
B_1125	Request either side of Broad Road (Parklands main extension) above Tryall Road is changed from 'Potential Low Density' to 'mixed use' as per attached diagram. Reason that the current proposal which has been submitted as a land use management application is envisioned to accommodate high intensity retail, office, light industrial/warehousing type activities, as well as pockets of affordable, single residential density housing at medium density ei. beyond 40 du/ha.	Site Specific	The revised DSDP densities definitions have been amended to be inline with the 2018 MSDP. Low density is 0 - 45du/ha; medium 45 - 75 du/ha and high is >75 du/ha. The area has been amended to medium density and a mixed use portion added.
B_400	I am a homeowner at Big Bay Beach Club and was informed about this proposed development after a fellow homeowner attempted to attend a session advertised in Table Talk on April 22, that never took place and also was not provided with information on whether/why the event was rescheduled and when the next event would take place. The increase in people, traffic, waste, demand on the environment, etc. will completely alter the landscape and directly detract from the reason why so many of us chose to buy in this area - rest, tranquillity, etc. I urge you to do away with this proposal and find equitable ways in which a larger portion of the population of the City of Cape Town can engage in this initiative to facilitate low-cost housing.	Standard Concerns: Erf 1117	The meeting did take place, however the venue was changed to the Milnerton Sub council Chambers due to the Atlantic Beach Estate Venue not being too small in terms of Covid-19 social distancing protocols. This was regrettably only picked up near to when the meeting was scheduled. Three other public engagements were held for the Blaauwberg District, as well as a narrated presentation being available on the City website, and this dedicated email address for commenting.
B_1126	This comment was used as a basis for formulating a list of common concerns. Please refer to that list for a summary of points raised and the responses.	Standard Concerns: D	This comment was used as a basis for formulating a list of common concerns. Please refer to that list for a summary of points raised and the responses.
B_1127.1	Request ex-Ratanga not shown as Biodiversity and Open Space as development approval already granted	Site Specific	Changed to show as urban development
B_1127.2	Mapping error - Long March to Freedom site area shown as waterbody	Site Specific	Changed to show as urban development
3B_1127.3	Mapping - land on either side of Edison Way showing as water body but already developed.	Site Specific	Water body layer still being amended.
B_1128.1	Wishes to be registered as an Interested and Affected Party for this process	Site Specific	Added to the email database

B_1128.2	the City must urgently come up with an action plan (infrastructure roll out with associated capital and operational budgets tied to benchmark time frames for delivery.) This will need to include a comprehensive plan of action to provide an ongoing and sustainable electricity supply.		The Infrastructure Sector Plans address this need. These will be part of the annual IDP review. Electricity generation is not a City mandate, although the City attempts to alleviate the current shortcomings in supply as and where possible.
B_1128.3	Concerns re development not negatively impacting Koeberg Emergency Plans and also that Eskom and the NNR should provide comment on the DSDF		Agreed, all developments, regardless of ownership, need to comply with the guidelines and regulations relating to development within the nuclear zones. Eskom and the NNR are invited to provide their comment on the draft SDFs and MSDF.
B_1128.4	Proposed Development guidelines re Melkbos CBD - note 6th Avenue has limited capacity to accommodate further commercial development.		Noted, guideline wording has been refined for clarity.
	Have not heard back on NEMA process for Melkbos City site. If not able to proceed swiftly then a LSDF should be done to provide certainty and clarity to property owners.		Queried with the project manager. The NEMA process will likely need to be redone due to certain studies not being recent enough for the regulating authority after uncontrollable delays. The project is still being pursued. The Planning department has considered the LSDF proposal, and considering other areas in need of local planning and the availability of resources, has not prioritised Melkbos LSDF.
	Mapping difference between subdistrict and district SDF		Some large sites have been amended. As a principle the entire site intended for new development is shown as an NDA on the district level map. On the sub-district map more detail is provided.
B_1128.5	Appreciate the golf course showing as high value green infrastructure		Noted.
	Erf 1117 - Request a local level plan is undertaken to guide its development and also raises that the guidelines have created uncertainty among the community due to being so high level. Mapping issue as above raised		Refer to the list of common concerns re Erf 1117 for local area plan suggestion; guidelines have been amended for clarity, further suggestions welcome. Mapping has been changed to reflect the same on district and sub-district map due to the scale of the site.
B_207	This comment was used as a basis for formulating a list of common concerns. Please refer to that list for a summary of points raised and the responses.	Standard Concerns: D	This comment was used as a basis for formulating a list of common concerns. Please refer to that list for a summary of points raised and the responses.
B_767	Request the inclusion of all the properties along the Old Darling/Mamre Road/Rygersdal Extension/R 304/ Saxonwald Road and Klein Dassenberg Road, as earmarked in the Klein Dassenberg Smallholders Development Framework (2002/3 the guide document for development within the Klein Dassenberg Small Holding area) be moved back into the Urban Edge of Atlantis. The inclusion of these properties into the Urban Edge will encourage investors and bring much needed economic growth, job creation and Development to the area. Part of this proposed area has already been included into the Atlantis Urban edge since 2011. The inclusion of the rest of the demarcated area would be favourable to all the people of Atlantis as well as the City of Cape Town.	Site Specific	This matter has been considered and the urban edge has not been changed. The reasons include that the area to the east of the R304 is part of the 'Areas of Agricultural Significance' as determined by the Department of Agriculture and urban development is discouraged there; and that there is adequate land for expansion of Atlantis within the urban edge. The City is pursuing a 'compact' city growth pattern. The Klein Dassenberg Smallholding Policy is proposed to be withdrawn as part of the DSDF review, and relevant land use guidelines have been included into the DSDF main document in sub-district 5.
B_21	This comment was used as a basis for formulating a list of common concerns. Please refer to that list for a summary of points raised and the responses.		This comment was used as a basis for formulating a list of common concerns. Please refer to that list for a summary of points raised and the responses.
B_814.1	The Blaauwberg District Spatial Development Plan and Environmental Management Framework (B-DSDF) does not make provision for the ongoing financial sustainability to protect and enhance ecosystems in private ownership in highly challenging locations. The fiscal crisis in which all organs of state find themselves to some degree and grim outlook for increases in State revenue (rates and taxes), makes this a grave omission. The Draft Coastal Economic and Spatial Framework (CESF) presents a more honest picture of the financial realities. It strives to find a balance in using development to fund its objectives where appropriate, especially where coastal resources are close to large poor communities. There are inconsistencies between the B-DSDF and the CESF as a result. The B-DSDF further makes a number of material errors in its descriptions of its own legal status, which have the potential to create confusion and misunderstandings.		Noted, the documents are being reviewed to better align, based on this feedback.

B_814.2	Organised crime prevention and damage costs the owners R3.7million per annum. The change in guidelines for the site now shows it as only high value biodiversity with no coastal node designation ie. development opportunity. This jeopardises the owners ability to continue these operations as it makes no commercial sense for the landowner to continue funding ongoing environmental management without a revenue generating activity on the property. It is unfeasible and unrealistic for the owners to maintain the environmental resources at such an expense without a way to recoup value.		Noted, see revised sub district guidelines and revised district guidelines for the Environmental SPC.
B_814.3	B-DSDf and CEsf differences on how to fund their objectives:The B-DSDf Implementation Plan provides a theoretical overview of available funding mechanisms and then applies them in respect of the spatial development components. It does not, however, address any mechanisms to fund the sustainable implementation of the EMF and environmental conservation imperatives. This is a glaring omission of which Springfontein is now a large, and high impact, case in point.The Draft Coastal Economic and Spatial Framework (CESF) raises the "Need for increased focus on resilience and financial sustainability" as an issue, whereas the draft EMF omits to address this issue.		Noted, the documents are being reviewed to better align, based on this feedback. However they also have different focuses.
B_814.4	Striving for a balance in using development to fund and maintain green infrastructure gets seemingly no attention in the B-DSDf / EMF.		Noted.
B_814.5	Order of costs to be generated for a sustainable coastal zone and biodiversity protection at Springfontein: The costs of maintaining the ecosystems on the farm in their current condition is 3.7 million per annum at present. These costs do not include the 24/7 monitoring and protection which is essential to protect the area from organised environmental crime taking place on an industrial scale at times, in the form of marine poaching and unauthorised off-roading. Applying the City's own 2014 estimate to manage the priority publicly owned Strandveld areas applied pro rata to Springfontein, and adjusting for inflation, the conservation budget for Springfontein should be in the order of R11.85 million in 2021, or just under R13 million per month. This amount excludes any capital costs and depreciation for vehicles, fencing, etc..		Noted, see revised sub district guidelines and revised district guidelines for the Environmental SPC.
B_814.6	Financially sustainable coastline and biodiversity protection through development funding: In the pre-scoping for the EIA in 2018, an eco-village of 730 residential units was proposed in a contained area of less than 100 ha on Springfontein. The balance of c. 1 100 ha will be proclaimed as a Nature Reserve its section 23 of the National Environmental Protected Areas Act (No 51 of 2003) with a Stewardship Agreement whereby ownership of the land is retained, and the owner(s) to take full responsibility for fire management and alien vegetation. A Homeowners' Association will take on the Stewardship Agreement. The constitution of the Homeowners' Association will be subject to approval by the City and a conservation levy will be imposed on each unit. At present value, the conservation levy would average R1 350 per unit over and above normal levies for a residential development should 730 units be developed. This level of contribution is considered highly feasible. The number of the units could possibly be reduced as low as 250 units, subject to market research confirming that a more exclusive target market can carry a conservation levy of R4 000 pm over and above the normal levy and property rates. Further detailed studies should determine the optimal balance between conservation revenue and the number of units.The aim is to generate a sustainable revenue stream of R11.85 m per year for the conservation management of Springfontein.		Noted, see revised sub district guidelines and revised district guidelines for the Environmental SPC.
B_814.7	The development of an eco-village at Springfontein could fund aspects of the Silverstroomstrand upgrading, including the needed services. The Springfontein proposal includes the creation of an eco-walkway along the coast from the Silverstroom Resort to the Springfontein beach as envisaged in the Draft B-DSDf. This will improve coastal access for the residents of greater Atlantis area with the physical infrastructure of parking areas, ablution facilities, etc already being in place.		Noted, see revised sub district guidelines and revised district guidelines for the Environmental SPC.

B_814.8	The sewage system for the Silwerstroom resort is in a dismal state and requires significant upgrades to prevent the ecological disaster that is happening as a result. The City operates a wastewater soakaway and has historically pumped effluent from the resort into a coastal area on private land. Neither the draft B-DSD/EMF, nor the draft CESF addresses a vital upgrade to municipal infrastructure at Silwerstroomstrand but continue to designate the resort for increased use and mixed-use development. Without rectification of the existing sewage treatment issues, Silwerstroomstrand should not continue to function as a resort for the greater Atlantis area.		Comment passed on to Water and Sanitation to address.
B_814.9	The 2012 MSD/ and current (2012) District Plan dealt with Silwerstroomstrand and Springfontein as two mutually supportive nodes. The 2017 MSD no longer mentions Springfontein by name but the coastal edge line is clearly delineated to accommodate development at Springfontein and appears to accommodate a secondary node just south of Silwerstroomstrand. However, the inclusion of a potential Springfontein development in any form has not been carried through to the draft 2021 B-DSD.		The Coastal Edge is no longer under City control as it has been gazetted as a Coastal Management Line, the basis of which was the 2012 Coastal edge line. A second node at Springfontein is not indicated as it is away from the existing built urban area, not well serviced, and has high value biodiversity. Thus, the area is not feasible from a City servicing and efficient spatial form perspective, and correspondingly is shown as a Discouraged Growth Area. Development in this STA needs to motivate for a site specific deviation.
B_814.10	The Draft B-DSD and Draft CESF provide no certainty for the future of the Springfontein's biodiversity and coastline, nor for limited development or intensive farming. Both draft strategic frameworks provide objectives and guidelines which are, in some cases, mutually exclusive, and in others ambiguous.		Noted, see revised sub district guidelines and revised district guidelines for the Environmental SPC.
B_814.11	The purpose of both strategic frameworks should be to give clear strategic direction without being prescriptive on the detail which should be addressed by planning and environmental application processes. But to get to that point, it must be clear to all stakeholders whether a development solution to sustainably fund conservation can be in alignment with the two strategic frameworks. And if not, clear options for sustainable alternatives need to be articulated. If these strategic frameworks cannot do this, a very large tract of land with a long history of being failed by government planning will continue to be failed until none of its very special and rare attributes remain.		Noted, see revised sub district guidelines and revised district guidelines for the Environmental SPC.
B_814.12	The proposed Springfontein Development can make a positive contribution to each of the B-DSDs strategies as set out in the annexure to this summary.		Noted, see revised sub district guidelines and revised district guidelines for the Environmental SPC.
B_814.13	Although the development of an eco-village does not support the notion of a more compact city and inward growth, it would not rely on public infrastructure investment, and would indeed solve some of the public infrastructure investments required from Silwerstroom in both the B-DSD and the CESF, as well as providing for conservation of the ecosystem and coastal area.		Noted.
B_814.14	The draft CESF indicates Springfontein as a minor node in figure 6 (p 27) with the adjacent areas highlighted as "New City Growth Underserved by Coastal Development". In contradiction, the draft 2021 B-DSD reflects the intricate coastal edge which was shaped specifically to accommodate a development at Springfontein, but the yellow area reflecting "New Development" and the local node designations have disappeared. The new district plan re-introduces the concept of an urban edge. By placing Springfontein outside the urban edge and no longer designating it as a node in the B-DSD, it effectively blocks any development potential at Springfontein and thereby the sustainable funding of conservation. If the DSD strategy is to have no development in any shape or form on Springfontein, it leaves a huge lacuna in the strategy. The B-DSD does not suggest any other means of funding the conservation of the land to serve the purposes that the frameworks suggest the land be put to.		Noted, see revised sub district guidelines and revised district guidelines for the Environmental SPC.
B_814.15	The City's Bionet, included in the EMF component of the current District Plan and of Draft B-DSD highlights the following action to be taken by the City in respect of Springfontein: "Action Core Flora Sites to be gazetted ASAP - we need action. High priority. Very high urgency (immediate). Landowner negotiations. Invasive aliens to be controlled." For the past 10 years, the City has not initiated such negotiations and has now removed the only instruments that it could use as a "value capture" opportunity from the Draft Integrated District SDF and EMF.		Noted, see revised sub district guidelines and revised district guidelines for the Environmental SPC.

B_814.16	The manner in which all eight draft District SDF/EMFs are presented, predetermines the outcome of detailed land use and environmental applications, rather than being an "informant to such statutory decision-making processes". The description of the legal status of the draft EMFs is misleading as illustrated in Annexure A. The DSDFs are introduced in Chapter 1 as legally prescriptive plans (and not policies) and imply additional red-tape steps by usurping powers not permitted in terms of SPLUMA and the MPBL. This includes the concept of having to apply for "deviations" from the District Plan, should a development proposal not be fully aligned with the old vision of the City, based on baseline studies that predate the impact of the global Covid 19 pandemic. By becoming inflexibly prescriptive, the DSDF is taking on the nature of a statutory control tool (similar to the development management scheme). As a result, it will lose its value as a forward planning instrument. If this is not the intention of the authors, the wording needs to be rectified as officials and the public rely on the printed text in responding to development applications, rather than the intentions of the authors.		Noted, feedback passed on to Chapter 1 author. An updated chapter has been provided in second draft.
B_814.17	10. Proposed changes. 10.1. Indicate Springfontein as a "local node" (coastal village) as defined on p 36 of the Draft CESF. 10.2. Indicate Springfontein on Figure 24: Blaauwberg Consolidated District SDF as a small local new development area in the vicinity where the coastal edge made provision for such development. 10.3. Add "Springfontein" in section 5.1.4 Sub- district 4: West Coast land use guidelines" to the Spatial Objectives for Silwerstroomstrand to read: "Recognise Silwerstroomstrand coast as a new development opportunity with Springfontein in support thereof and give guidance to its possible development." The "Supporting Land use Guidelines" for Springfontein could include linking the limited development to protecting and funding the balance of the land as a nature reserve in perpetuity and contributing and support to the enhancement of facilities at Silwerstroomstrand. 10.4. Correct the misrepresentations that are (inadvertently) created in "The status of the Integrated District SDF and EMF"		Please see revised sub-district guidelines and Chapter 1. The detailed suggestions of this comment are appreciated.
B_1160	Figure 21: Blaauwberg Sub-district 3 contained in the Draft Blaauwberg Integrated SDF: 1. We acknowledge that the City has taken cognisance of our motivation for the designation of the small portion of land previously demarcated as "discouraged growth area" and that this land is now designed as "new development area".		This has remained in the updated draft.
	2. Further, we agree with the designation of Berkshire Boulevard as a "Lower Order Development Corridor". This designation is entirely appropriate given the mixed use intensification that is anticipated to occur in this corridor over time, especially when it links up with the R27 to the east.		Noted and agreed.
	3. We are unclear as to why a "Neighbourhood Civic Cluster" is proposed within the important nephemeral pan area. We assume that this is a mistake and that it will be rectified in due course.		Mapping error which has been rectified. Thank you for pointing out.

	Blaauwberg Nature Reserve and the Urban Development Edge: In our previous comment we noted that a Condition included in the Agreement of Sale between Garden Cities and the City of Cape Town (in 2010 for the 462 hectares of land that now forms a core component on the Blaauwberg Nature Reserve) was that the 'urban edge' be fixed on the boundary of the enlarged BCA, and that Garden Cities could continue to develop the land to the east of the BCA (subject to the usual regulatory processes being followed). The Blaauwberg Sub-district 3 & 4 (Fig. 21 & 22) reneges on this legal agreement in that the "urban development edge" has been moved to exclude the land to the east of the BNR. This situation clearly has a significant financial implication for Garden Cities and puts their numerous corporate social responsibility programs (including the State-assisted housing project at Greenville) at risk. Unless the area in question is allocated as a "future development area" or similar designation, it is almost impossible for Garden Cities to undertake the requisite long-term planning and regulatory processes (incl. Act 70 of 1970, NEMA etc.) – which may take as many as 10 years to complete. This untenable situation may force Garden Cities to take steps to legally review the Agreement of Sale with a view to having it set aside by the Courts.		Noted, the City has requested a legal opinion on the matter and a longer direct communication will be sent to Garden Cities. It is our preliminary understanding that a sale agreement cannot bind the City into a certain urban edge in perpetuity. The condition in the Agreement asserted that a recommendation would be given as to the urban edge delineation. That recommendation was given and adopted in 2012. Based on changing circumstances, the City changed its growth trajectory and spatial policy to pursue a more compact urban form in 2018 which has resulted in the contracted urban edge in the 2021 draft DSDF.
	Wolwerivier Incremental Development Area: As outlined in our previous comment, the City of Cape Town approached Garden Cities to purchase a substantial portion of Garden Cities' landholding to the east of the Atlantis railway line, to establish an Incremental Development Area. This land sale occurred in 2010. A small portion of the land was initially serviced for the Wolwerivier IDA, but there has been no progress in servicing and developing the vast majority of the Wolwerivier property. The Cape Town Municipal Spatial Development Framework (2018) noted "Signalling this change in the City's approach to delivering human settlements is the rescindment of the Wolwerivier housing project and the City's recent statement of intent regarding affordable housing and social housing in Salt River and Woodstock ..." The Blaauwberg Sub-district 4 plan (Fig. 22) designates the Wolwerivier property as "Other Green Spaces" while the Draft District Spatial Development Framework (Fig. 24) designates it as "Biodiversity & Open Space Network". Based on these land use designations, the Wolwerivier land holding appears to not be required by the City of Cape Town and is unlikely to be utilised for the purposes for which it was purchased, that is, entry-level housing. The sale of this substantial portion of land to the City was agreed to by Garden Cities as the proposed use for entry-level housing aligned with the MSDF at the time, and also with Garden Cities' overarching forward planning for the Atlantis railway corridor. Considering this situation, Garden Cities intends to investigate making use of the reversionary clause contained in the Agreement of Sale.		As communicated with Garden Cities subsequent to this comment, the City is considering the matter and getting a legal perspective. The designation of Wolwerivier as 'Other Green Space' on the map was a layering error and it has been shown in grey as existing urban development.
	Garden Cities remains available to discuss any aspect of this correspondence further with the City of Cape Town.		Noted and appreciated.
B_1161.2	The 2018 MSDF's 'purple turtle' shifted the emphasis from further densification up the West Coast (in the form of urban sprawl eg, Parklands, Parklands North, Sunningdale, Rivergate) to the City centre (Woodstock, Salt River, seapoint).		This comment reflects a different understanding of the urban inner core to what is intended. The urban inner core is the investment focus of the city where the City can prioritise interventions to enable and incentivise growth. This is not at the exclusion of other areas. The 2018 MSDF is clear in Table 4 that the incremental growth and consolidation area (orange - which includes Parklands, Sandown Rivergate etc.) also permits development, subject to capacity. As such, the incremental growth area is expected to accommodate new development. The reality is the entire city experiences growth pressure and the incremental growth areas still support growth, but indicate the City will not prioritise investment into these areas.
B_1161.2	The urban sprawl was permitted despite inadequate engineering infrastructure because officials were told to 'tick the box'.		Each application for new development is considered by the relevant engineering departments for comment on services availability, based on these inputs conditions are imposed on new developments where necessary. Development contributions are also required to help fund the necessary infrastructure. Each City official is bound by a Code of Conduct and Ethics. Should you suspect officials are not acting with ethically, or are being coerced, you are encouraged to report this behaviour to the City's Ombudsman.

B_1161.2	Have continually been drawing attention that densification in Table View is not being matched by infrastructure upgrades.		The Potsdam WWTW has regrettably been substantially delayed. This meant that the capacity which was expected to be online already is not yet available resulting in a constraint on any new development. Table View has aging pipes which makes them vulnerable to 'bursting' as they degrade. There is an ongoing pipe replacement program, as well as other measures e.g., pressure management, to address this. The City can appreciate the pace of these interventions is not at the pace residents or officials would ideally like it to be. This is because resources have to be prioritised across the City and other areas in greater need will require a larger share of the budget.
B_1161.2	Water samples in the Diep River and Rietvlei indicate it is polluted (no fish and Cape Clawless otters have to cross the R27 to the sea) and Potsdam WWTW not coping. The pre-directive on the Diep River does not seem to be enforced.		There are numerous sources of pollution of the Diep River including industrial run-off and inadequate sanitation services in informal settlements which result in untreated effluent flowing into the river. Addressing the state of the river is for Environmental Management and Catchment Management departments. The Diep River Estuary Management Plan has recently been reviewed to address operational issues; implications for spatial planning have been included in the revised draft since the April 2021 version. The expansion of Potsdam WWTW is underway. Other large/longer term capital projects required to address this issue have been included into the DSDF and Implementation Plan. The DSDF guidelines include that new industrial development should be set back from the Diep River (See Environmental Planning Categories and Guidelines Table) and that informal settlement upgrades and servicing should be prioritised. The greater Du Noon area is identified as a vulnerable area which required budget and planning prioritisation (See Implementation Plan).
B_1161.2	The Cape Town Harbour container depot expansion has altered wind and wave action so that the lagoon mouth no longer breaches naturally, wave action is destroying the dunes between golf club and dunes, changing Sunset Beach from white sand to pebble, and eroding Kleinbaai so that houses on the beach are in danger.		Noted, the concerns have been forwarded to Coastal Management Branch. To draw attention to areas more at risk of coastal processes, with input from Coastal Management, these are shown on the DSDF sub-district maps and there are guidelines for development in these areas.
B_1161.2	Concerns of destruction/ecological state of the Diep River.		Noted, there are extensive development guidelines in the DSDF-EMF to direct new development in the catchment area in an appropriate location and manner.
B_1161.2	New applications are approved in the area which increases pressure on the struggling ecosystem.		New applications are circulated to line departments, including Environmental Management Department, for comment. The DSDF-EMF is used when assessing applications and so your comments on this draft, particularly about the type and location of development proposed in the DSDF-EMF may assist in shaping where and how development could be considered more appropriate in future.
B_1161.2	Opposed to the '2km densification radius around Bayside'. Was a TIA done for this?		
B_1161.2	Opposed to "the proposal to re-zone the area within a 3km radius from Marine Circle as potential high density(75+ dwellings per hectare)"		This was not proposed in the DSDF-EMF. The DSDF-EMF is a policy document and does not give or take-away rights. The document does not include any development applications within it. Any owner wishing to rezone their property will need to submit an application. The document shows a conceptual node around the Marine Circle/ Bayside area. See response above for detail.
B_1161.2	Opposed to development application next to Bloubaerggridge Property		Noted, the site has been changed.
B_1161.2	The proposal of a passenger and goods railway line to Atlantis is a good idea in theory but many practical reasons why it hasn't happened yet.		Agreed. Nevertheless, the DSDF-EMF map shows a desirable 'end-state' vision and so the proposal has been retained.
B_1161.2	Upgrade of Parklands Main Road - How will this be accomplished, and upgrade to what?		Not a proposal to upgrade Parklands Main in the DSDF-EMF. Parts of it have a 'mixed use intensification' designation. This indicates that more intense land uses could be appropriate there. E.g., A property could transition to include a non-residential use (e.g., a shop, cafe etc.).

B_1161.2	Concern that expansion ideas do not take into account or provide additional access or exit roads, reserve land for education, clinics or social nodes. It should also include useable recreation space, sports places, reasonable living standards which should factor in reasonable travel times on decent roads. Proposed spatial development framework does not seem to accommodate.		We agree that designing for community requires considering social facilities, recreation space and quality of life. There are a number of 'Civic Clusters' on the DSDF sub-district maps which indicates where we think existing and new clusters of social facilities would be appropriate. The scale of the DSDF means it is not appropriate to identify specific sites for individual uses, especially of smaller facilities. Community Services and Health has been consulted and the revised draft includes a list of required facilities for the 2040 estimated population, as well as what backlogs there are. This information is in the Baseline and Analysis Report and the DSDF under 'civic clusters' and in sub-district guidelines where possible. The Implementation Plan includes a list of projects too. We have consulted with WCED on space for education facilities. One site has been indicated in Blouberg and 2 new sites are being included as part of the Rivergate expansion. Du Noon area has the greatest need for land for schools, but there is difficulty finding land. Sites are also proposed in the Annandale development. A large new public facility cluster is proposed at eh Rivergate station node. Suggestions of specific sites or needs are welcome to assist in refining the DSDF to be more useful.
B_1161.2	Do not support the proposed densification proposals		Noted
B_1161.2	Propose an eco-overlay zone for entire district instead in light of polluted rivers and being surrounded by critical biodiversity and nature reserves.		Overlay zones focus on achieving a specific objective. Without knowing what provisions of the proposed overlay-zone would be, a district wide overlay zone is likely too large a scale to be effective. Furthermore, The EMF is a legislated requirement. It is a policy and cannot be replaced by an overlay zone which is more appropriate as a tool to give effect to a specific policy intention.
B_1162.1	Rapid development in Blaauwberg presents some relief to housing crisis but also challenges		Agreed.
B_1162.2	Bulk infrastructure is taking strain in the area. Fresh water pipe bursts in Flamingo Vlei, Blouberg and West Beach. Pipe replacement project has been budgeted for. In Parklands north many sewer blockages - education can alleviate this somewhat but the overall challenge remains due to density of the area.		See response to Cllr Solomons above. Parklands north is a fairly new area and as such the reticulation network should have adequate capacity, even considering density. Education of residents is critical, as you note. Pipe bursts in this area are likely due to misuse of the system (putting inappropriate objects e.g. nappies down toilets) which causes blockages and then pipe bursts.
B_1162.3	Pump stations are also in a poor condition. Should put a hold on new development until pump stations and reticulation in full working condition.		This is not an SDF issue but one for the line department. Reticulation and pump station capacity is considered by the Water and Sanitation line department when they comment on new applications. Thus, the capacity of the individual pump stations and reticulation which a development will require is considered.
B_1162.4	There is pressure from new and existing informal settlements which also impacts the quality of the Diep River		Agreed. Where possible, servicing and upgrading informal settlements should be prioritised to bring dignity to the people living there, and protect the natural environment. The DSDF has identified these areas as 'Vulnerable Areas' for prioritisation in budgetary and planning resource allocation.
B_1162.5	Congestion is an issue in greater Table View, Parklands, Sunningdale. Most people do not take the MyCiti		Agreed. One of the main causes of congestion is that where people live and where they need to go (work, school, shops, entertainment places) are not close together. The DSDF attempts to address this by promoting mixed use development so that residential and commercial/educational land uses are closer together, reducing the distance people need to travel and the number of trips they need to take. The pace of change for this is slow as most of the city is built up and redevelopment/new development is small in comparison to the existing built area. Promoting cycling, NMT and public transport is one way to reduce, not eradicate congestion.
B_1162.6	Road maintenance, expansion of networks, upgrading of bulk etc should be prioritised for responsible densification		Agreed. The Implementation plan gives affect to this.
B_1162.7	need to reconsider the DC contributions and their usage for needs such as schools, community facilities and upgrading infrastructure. There is a need for government schools in the area. The more development there is the more children will be in the area and schools will be needed. WCED is struggling to place all children.		Agreed, the DSDF cannot alter how DCs are spent. The DC Policy needs to be amended for this to happen. Schools pressure is noted. See response above to Cllr Solomon re school sites in the area.
B_1162.8	Request suggestions and concerns are taken into account. While there are a large number of objections against the draft from the community, it is up to us as the City to listen to the community and then to find alternatives or solutions to the problems and concerns raised.		Agreed, any further suggestions or specific recommendations are welcome as we revise the draft DSDFs-EMF.

B_978	Specific Comment relating to MCRP thesis: - The supporting land use guidelines to "promote integrated human settlement development" are vague and really pass over a very problematic issue in terms of supporting genuine integration. - The 'TRAs' referred to - is this in fact referring to the Wolwerivier IDA (which is in fact permanent, and growing quite drastically)? - The guideline to "upgrade residential units" does not refer to which units. The TRAs? The Wolwerivier units desperately need to be upgraded, but flexibility must be accounted for, and so must the future status of the site be clarified and fed into decisions made around the upgrades. - The Baseline survey from 2019 acknowledges Wolwerivier, however I am unsure as to how this current district proposal has considered that. - Because this review only occurs every 10 years, I would hope that greater acknowledgement would be given to a growing informal settlement in Sub-District 4, and the efforts that can be made to support the mushrooming community that need greater connectivity, services and general planning.	Site Specific	The concern related to the ambiguity regarding integration of human development is noted. It can be noted that in the Implementation Plan shows how the current DSDF plans on using spatial strategy into measurable indicators. For example, including the ratio of housing options approved/developed by type within areas targeted for integration in District between 2020 and 2025 towards the target of encouraging integrated settlement patterns. -Reference to specific concerns regarding Wolwerivier is noted. Wolwerivier has been identified as needing attention.