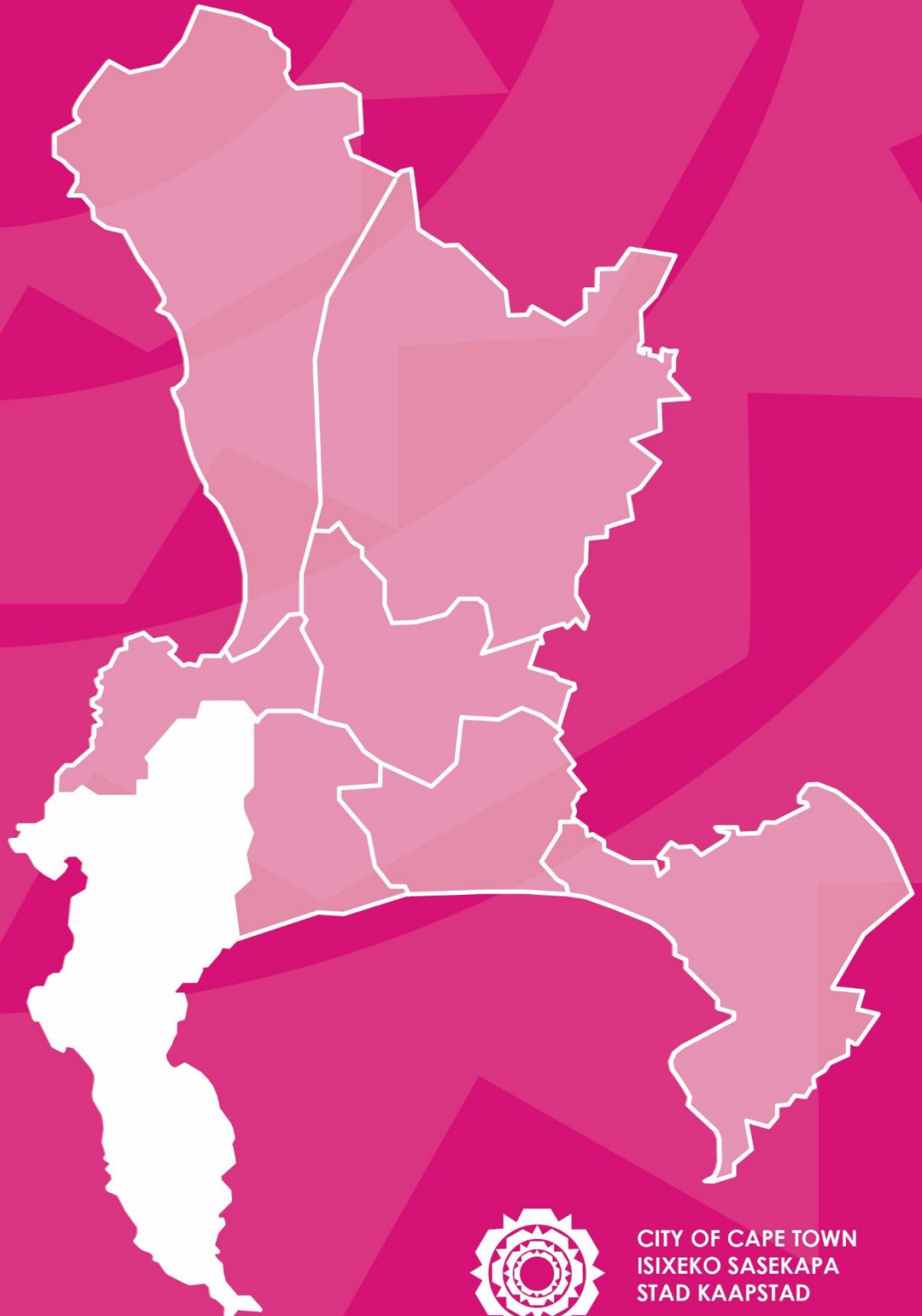


SOUTHERN DISTRICT PLAN

Integrated district spatial development framework
and environmental management framework

APPROVED - Vol. 4: Annexures



**JANUARY
2023**



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

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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 CIP)	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.

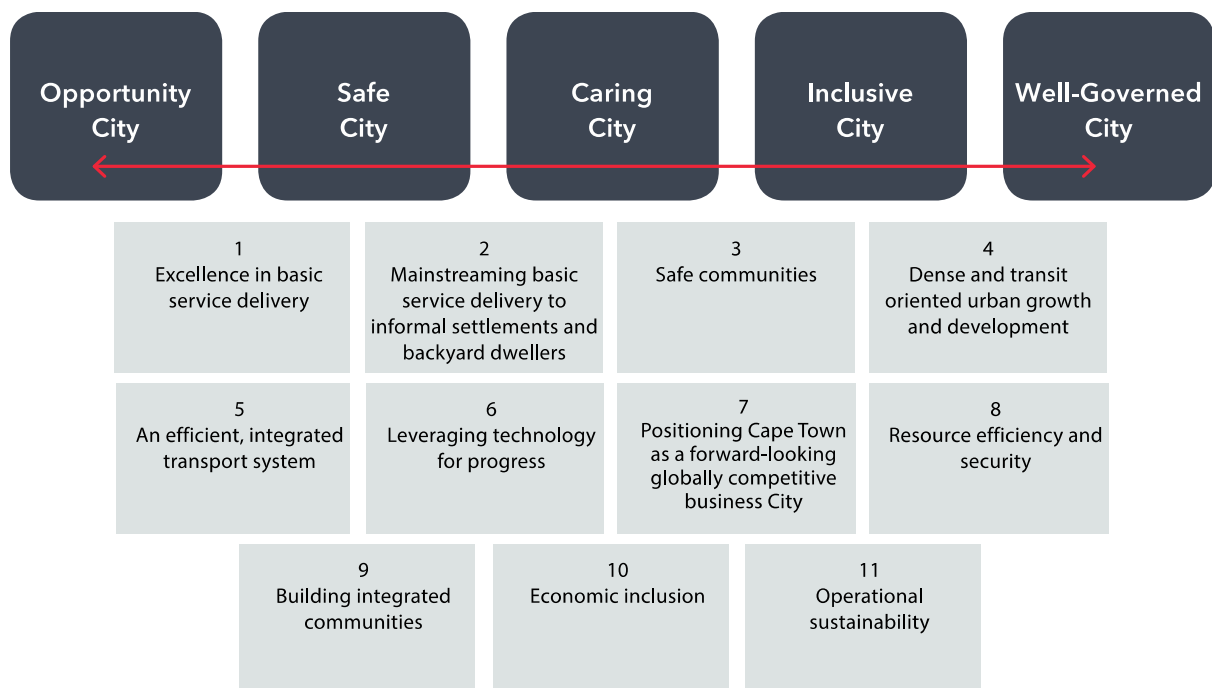


Figure 1: IDP pillars and transformation priorities

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.

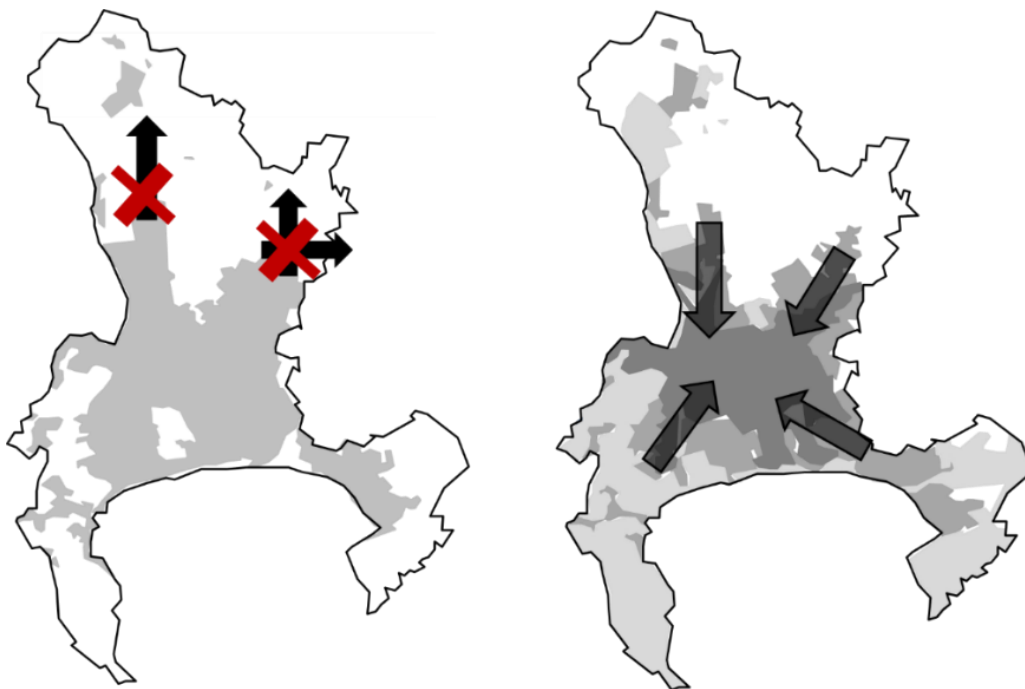


Figure 2: 2012 versus 2017 long-term spatial vision

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 <u>or</u> • 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 <u>or</u> 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.

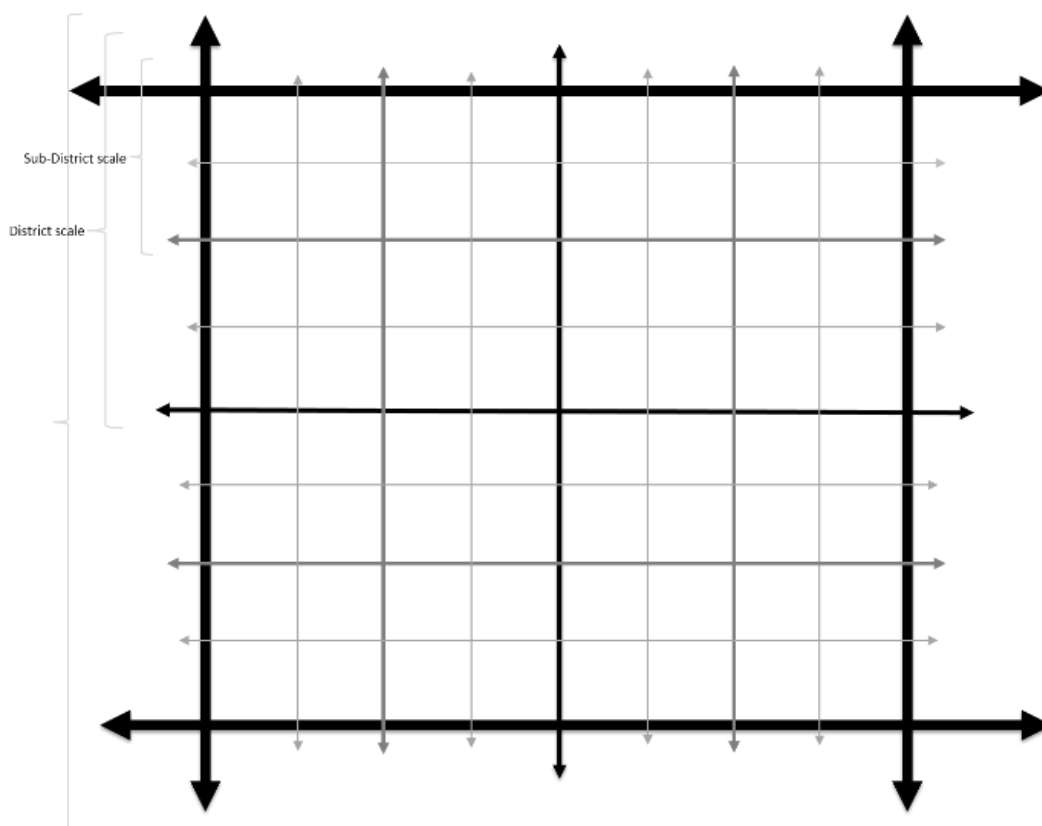


Figure 3: The Basic Accessibility Grid

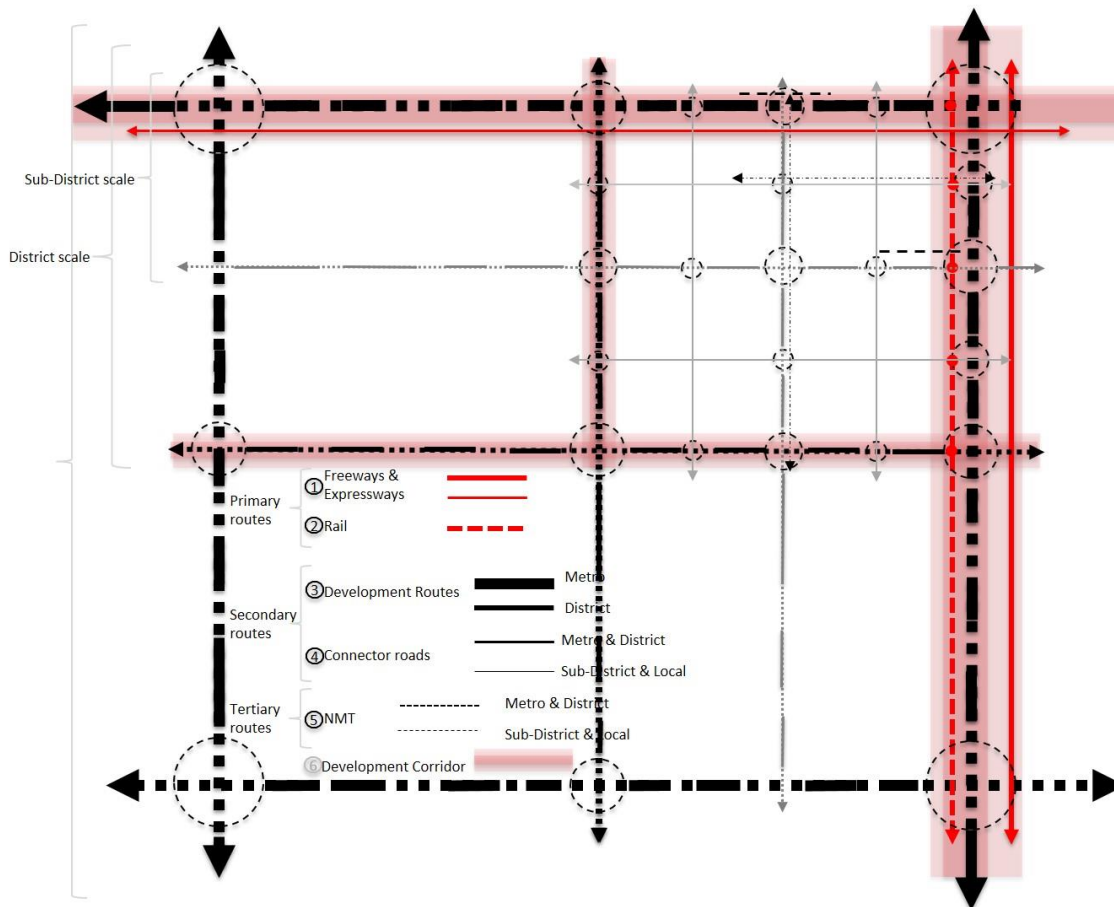


Figure 4: The comprehensive City Accessibility

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.

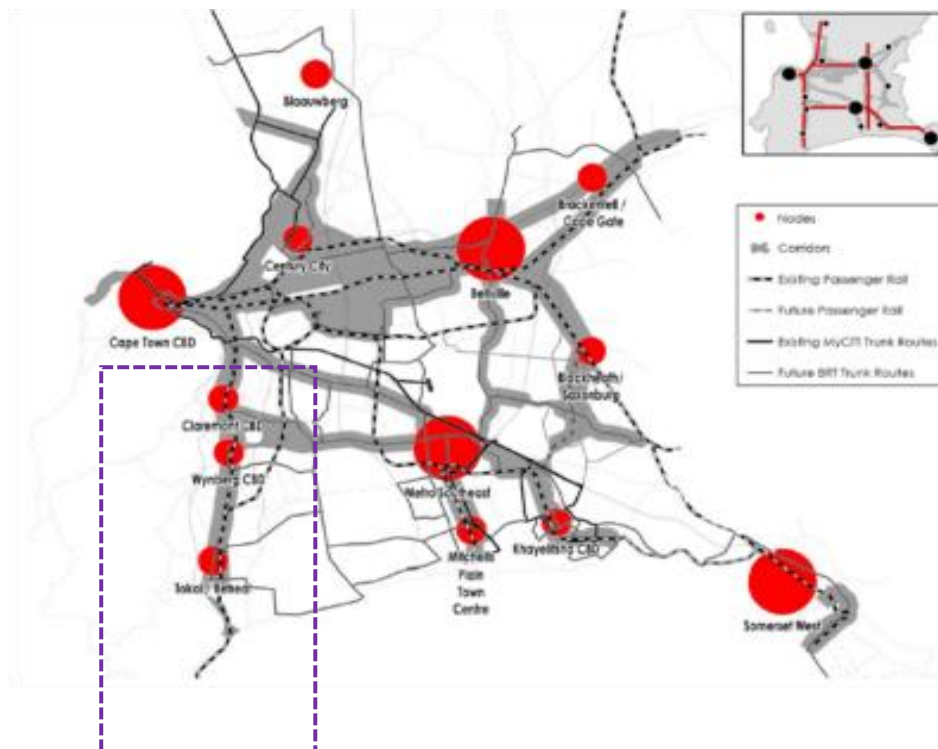


Figure 5: Cape Town's Accessibility Grid (as per CTMSDF, 2018)

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.

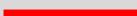
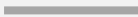
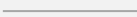
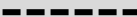
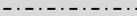
E. Development Corridors:

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

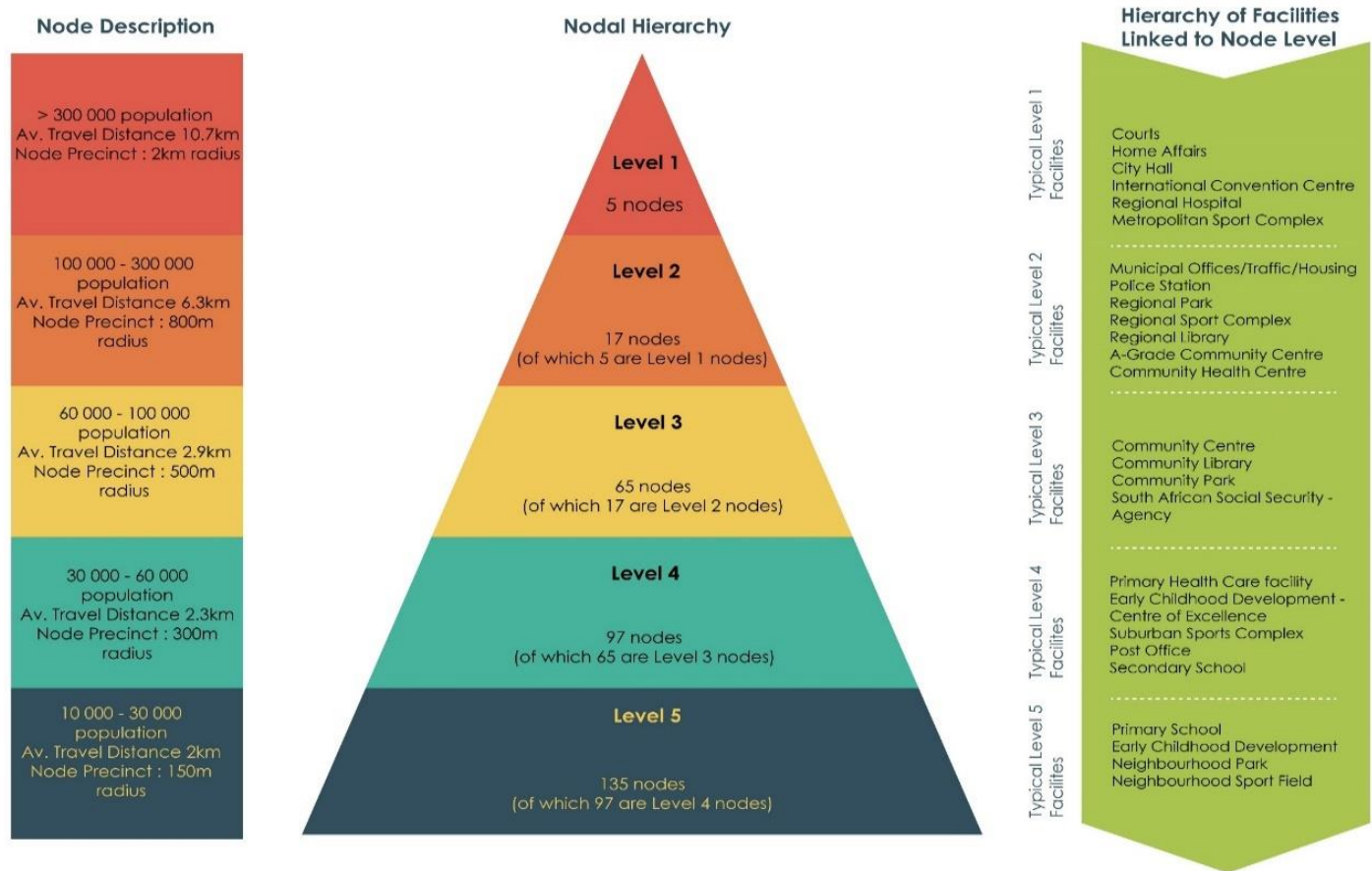


Figure 6: Facilities nodal description and hierarchy

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

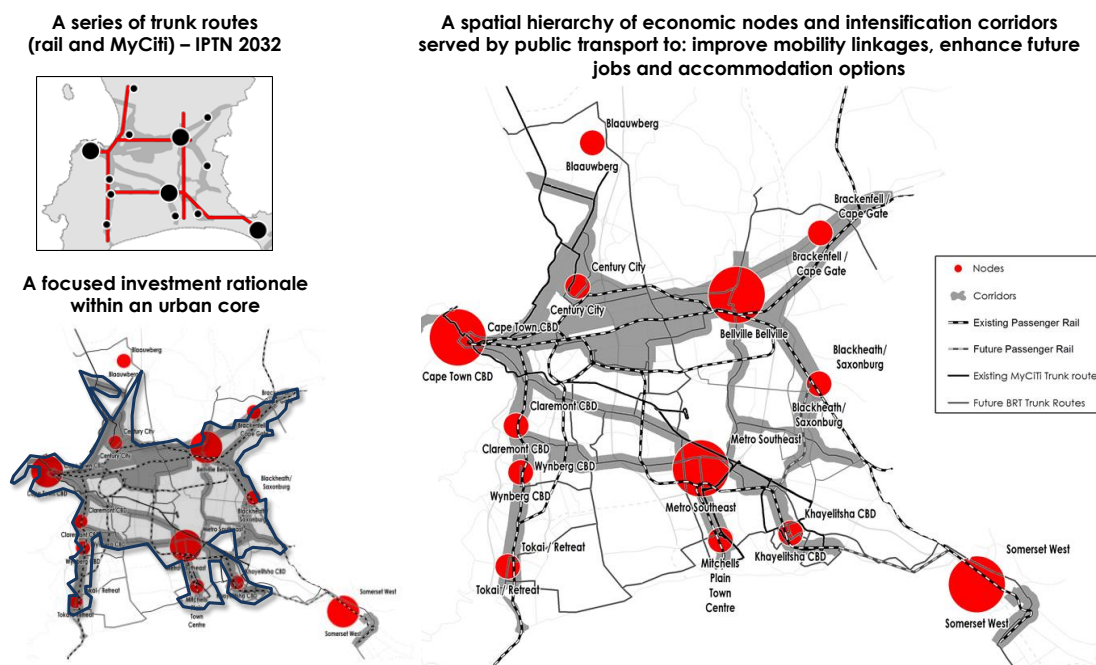


Figure 7: Spatial anatomy of the Blue Turtle

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.

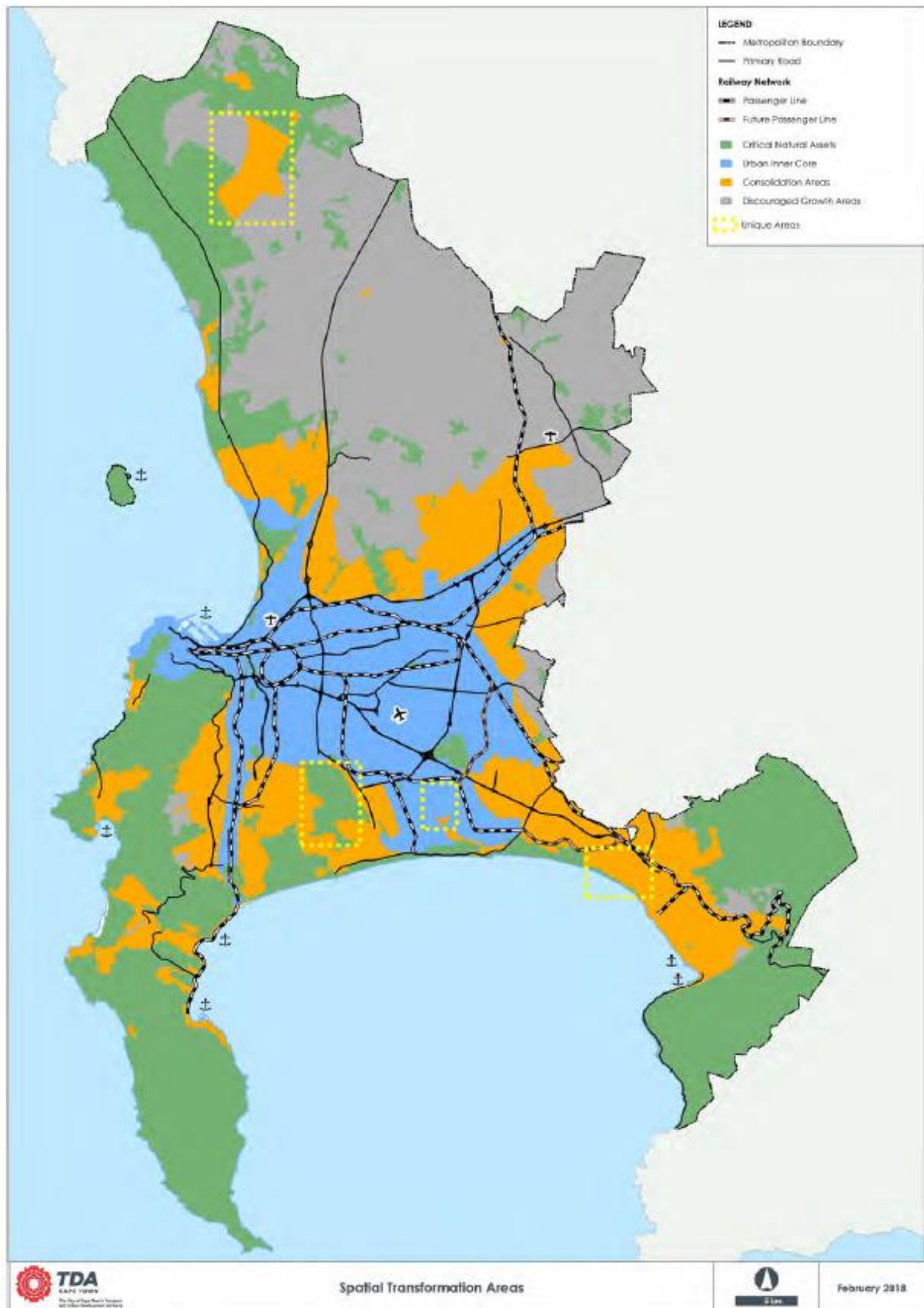


Figure 8: Spatial Transformation Areas (extract from CTMSDF, 2018)

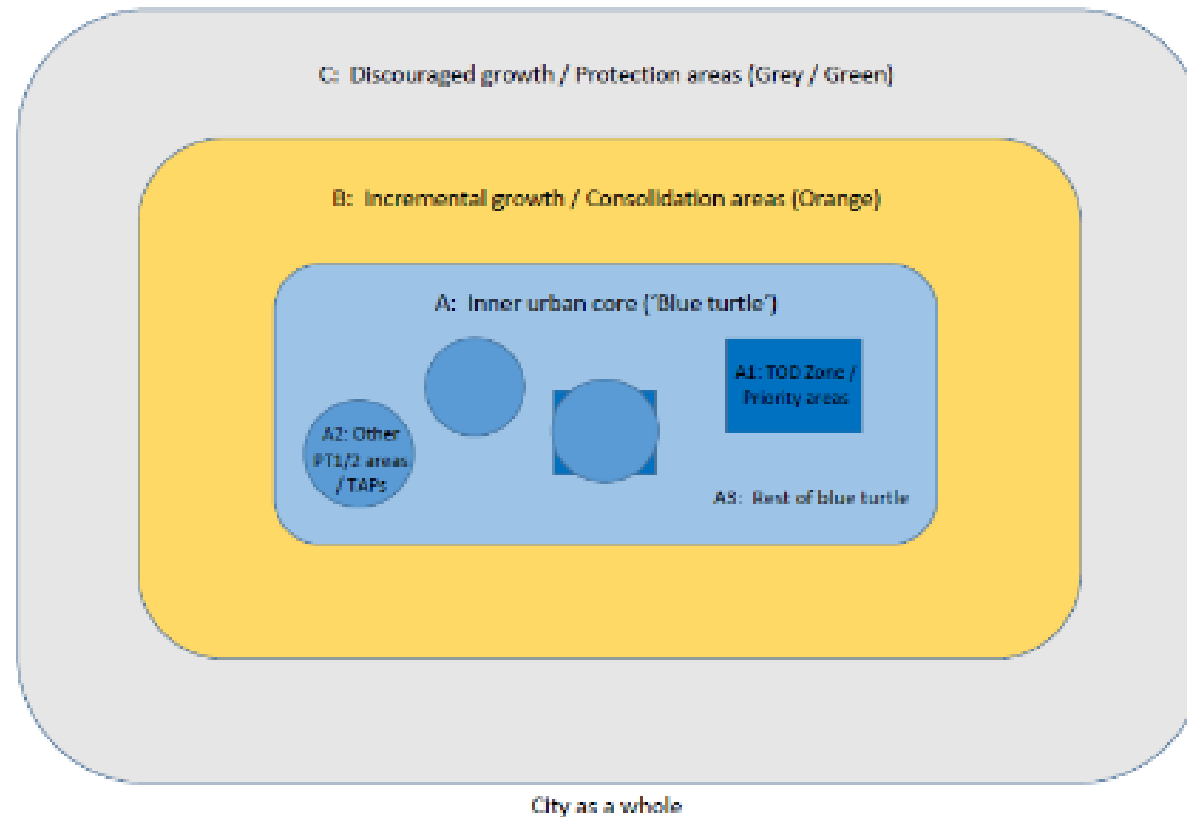
9.4. Guidelines for delineation

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.	

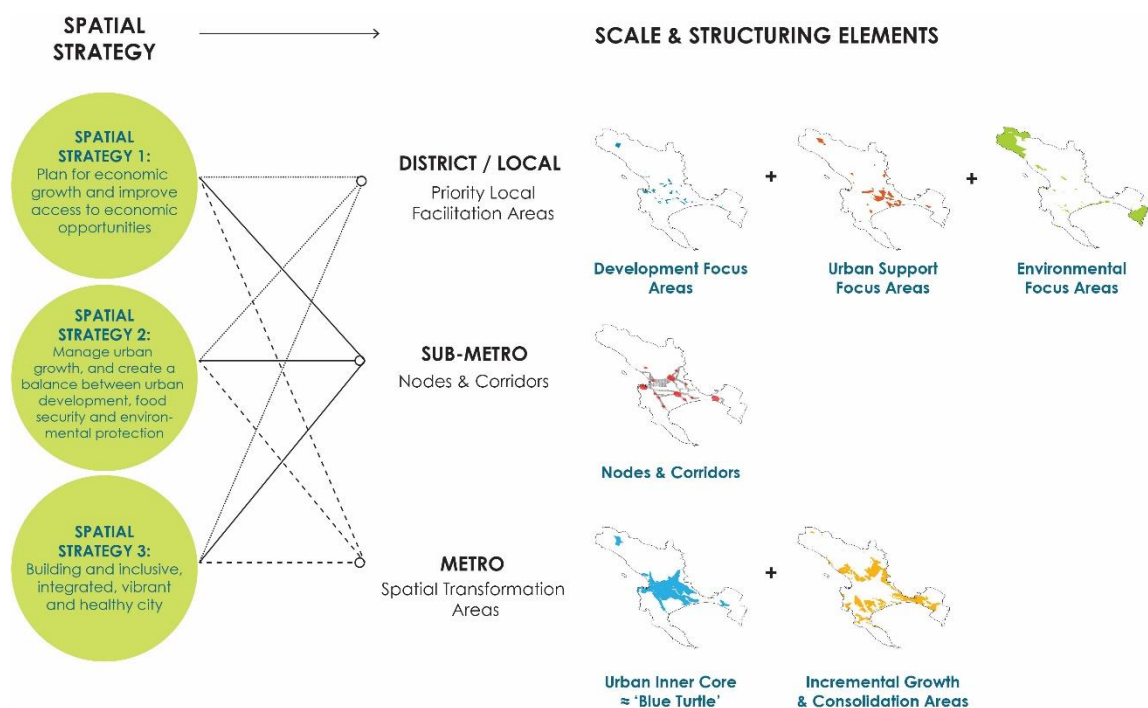
	9. There may be exceptional cases that relate back to drafting the MSDF where agreements have been resolved afterwards											
C. Defining the Coastal edge	1. The Coastal Edge is a demarcated area around the coast in such a position as to limit urban development, primarily to protect coastal resources, 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 Silverboomstrand, 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 Silverboomstrand, 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.	
	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 Silverboomstrand, 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.							
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

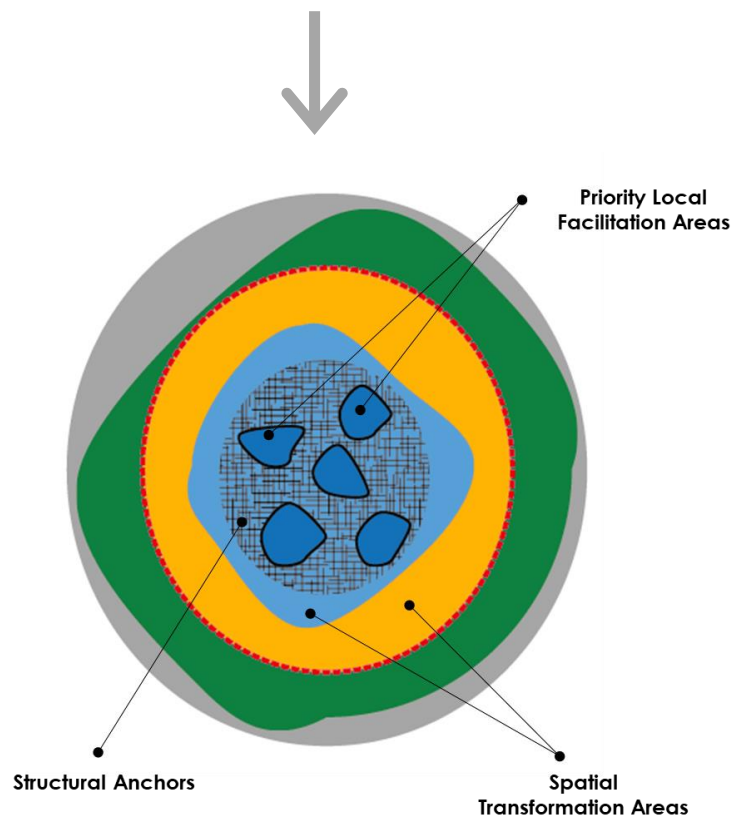
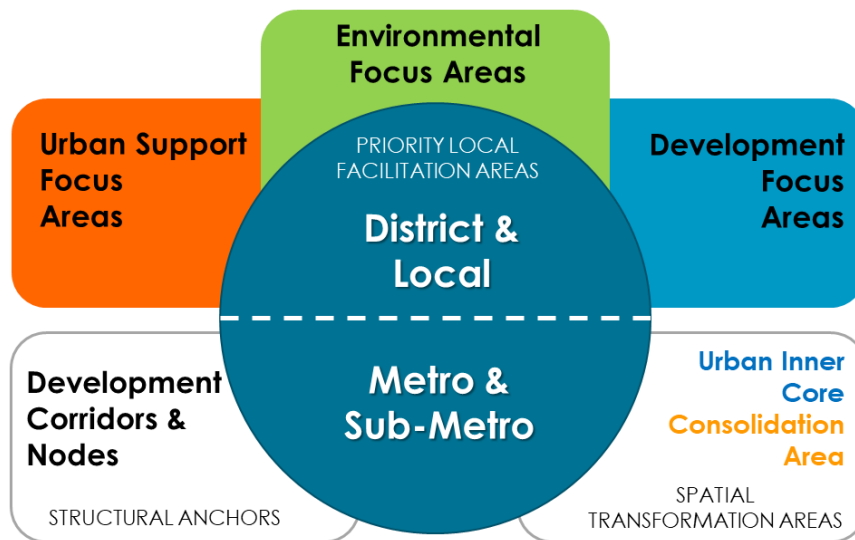
Priority Local Facilitation Area Identification Methodology

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

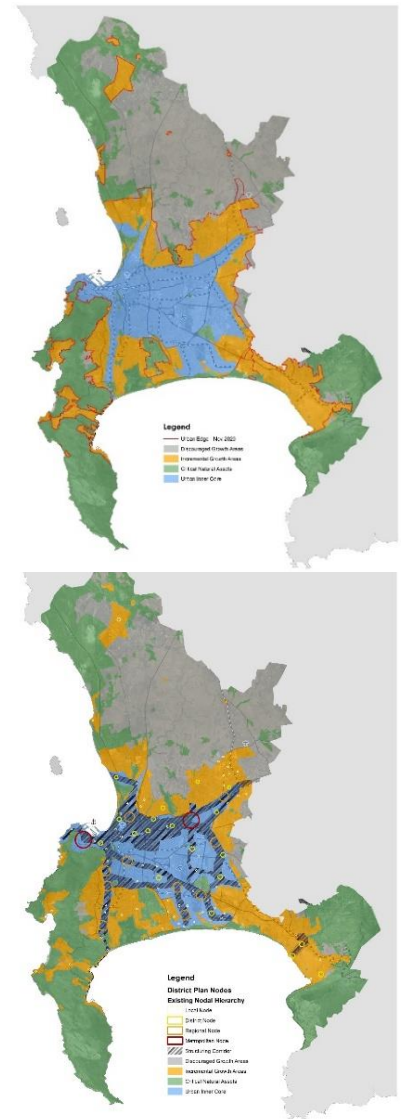
At a sub-metro level the basis for spatial prioritisation are the major structuring elements:

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

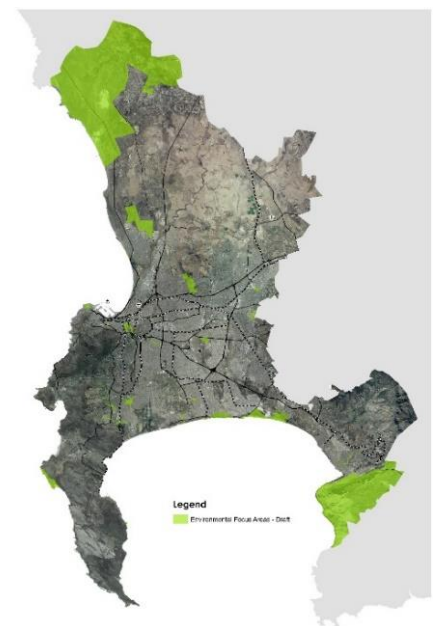
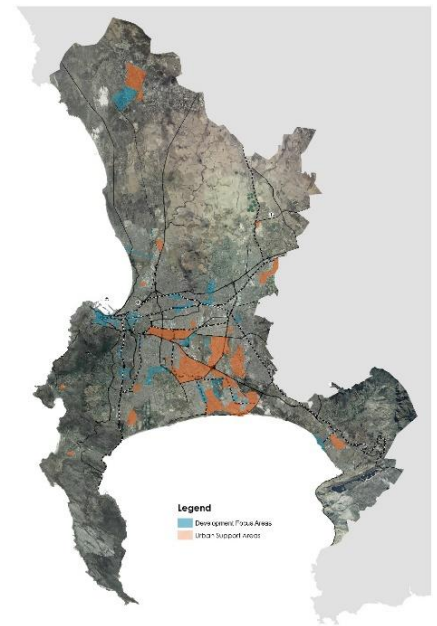
- Targeted local areas for urban restructuring and planning focus in the short - medium term that have the highest potential spatial transformative impact with dedicated budget, planning or investment to facilitate development.
 - Includes CLDP, Integration Zone PLAs, Priority Precincts, SEZ, ECAMP

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.

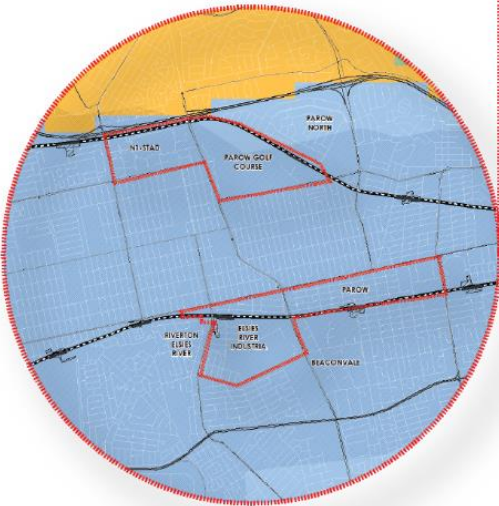
- General areas for urban intensification, even if located in development/ activity corridors.
- Areas with a singular focus, be it transport upgrades, coastal upgrades, public facility upgrades/ development, an informal settlement and/or housing projects.
- Should not be conflated with the Urban Support 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

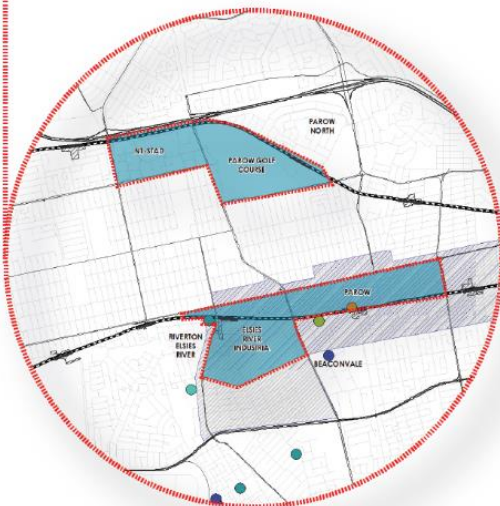
Once the planners have identified and delineated their DFAs, the following checklist will be used to verify that each area identified meets the criteria. An area must meet all the criteria in the checklist to be considered a DFA.

Development Focus Areas - Criteria

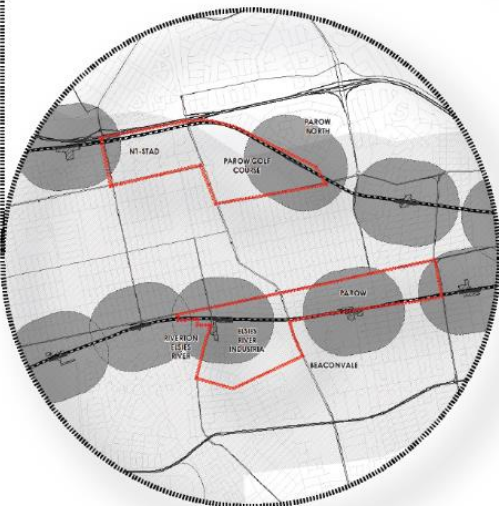
	Urban Restructuring / Transformative Potential	High Levels of Accessibility	Dedicated Funding, Planning or Investment (<10 years)	Multi-Sectoral Focus	Priority Areas			Final Selection	Comment
					CLDP Programme	Integration Zone Priority Precincts	Other High Profile Project		
	Qualitative - Location Potential / Spatial Vision	IPTN (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



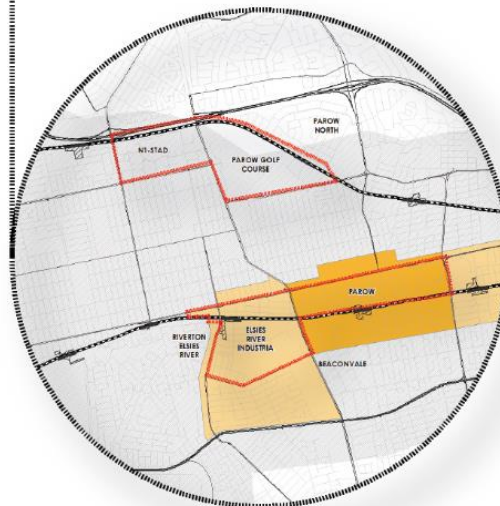
- ✓ Urban Inner Core
- ✓ Development Corridor
- ✓ Node



- ✓ 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.

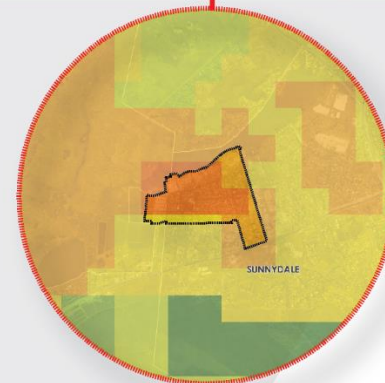
Urban Support Areas - Criteria

	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		
								✓		

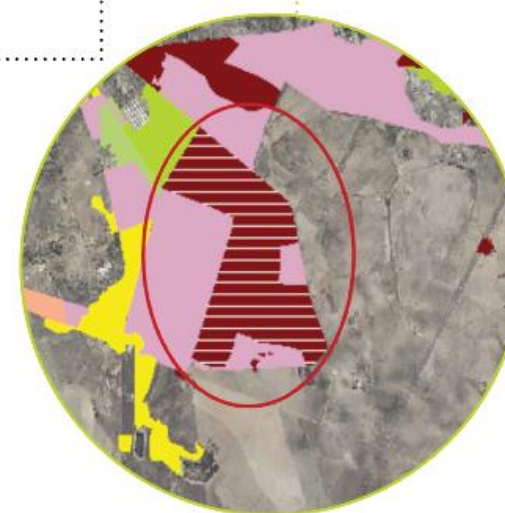
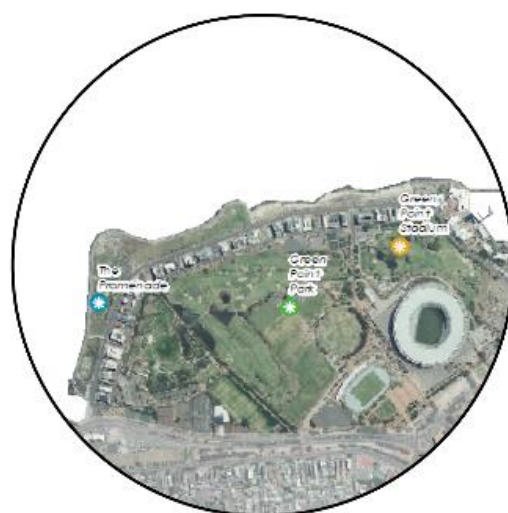


✓
'Urban restructuring' /highest potential transformative impact

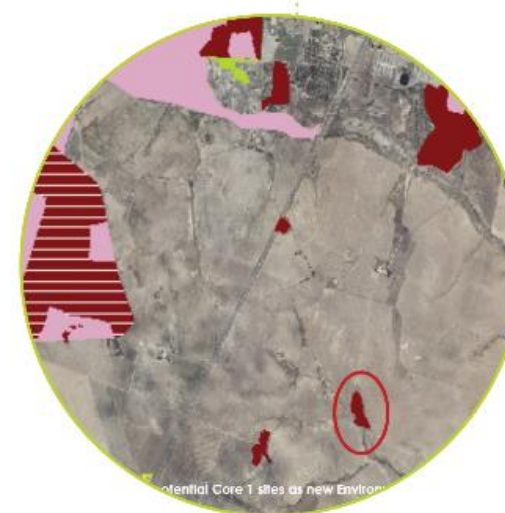
✓
Service Delivery/Built Environment/Socio-economic Need and Vulnerability



✓
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>				Final Selection	
		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		Comment
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). Please refer to Sheet 2 for criteria to consider.		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) <i>(previously referred to as backyarder units constructed out of temporary materials)</i>	• 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.

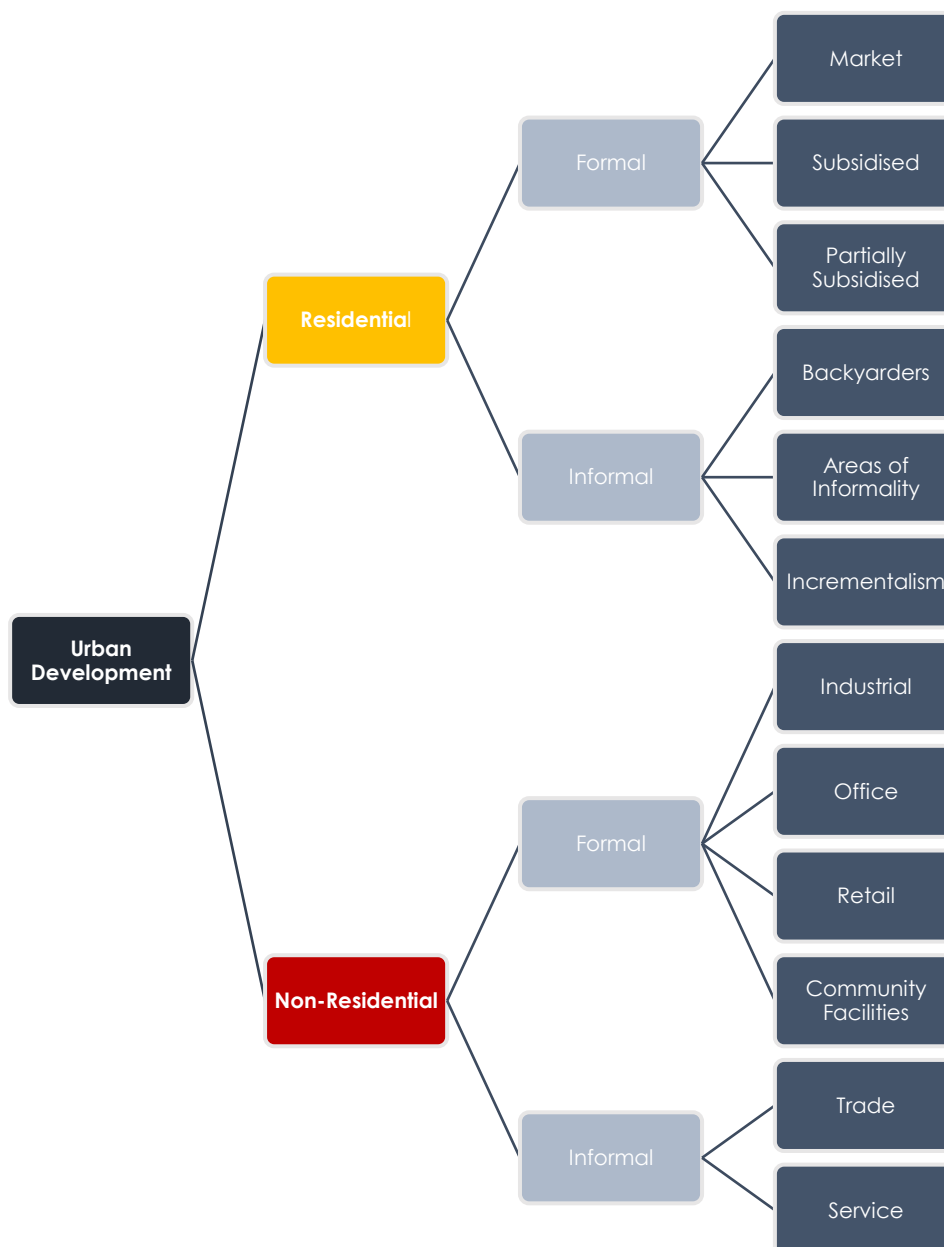


Figure 9: Types of Property Development

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.

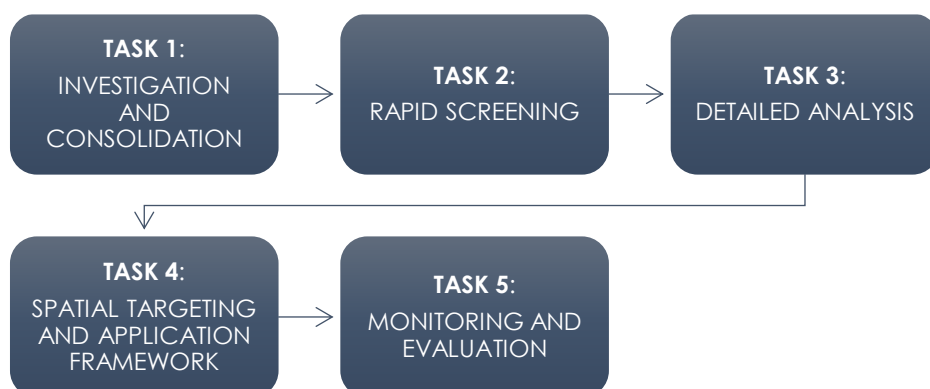


Figure 10: Key Tasks

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 pragmatics 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).

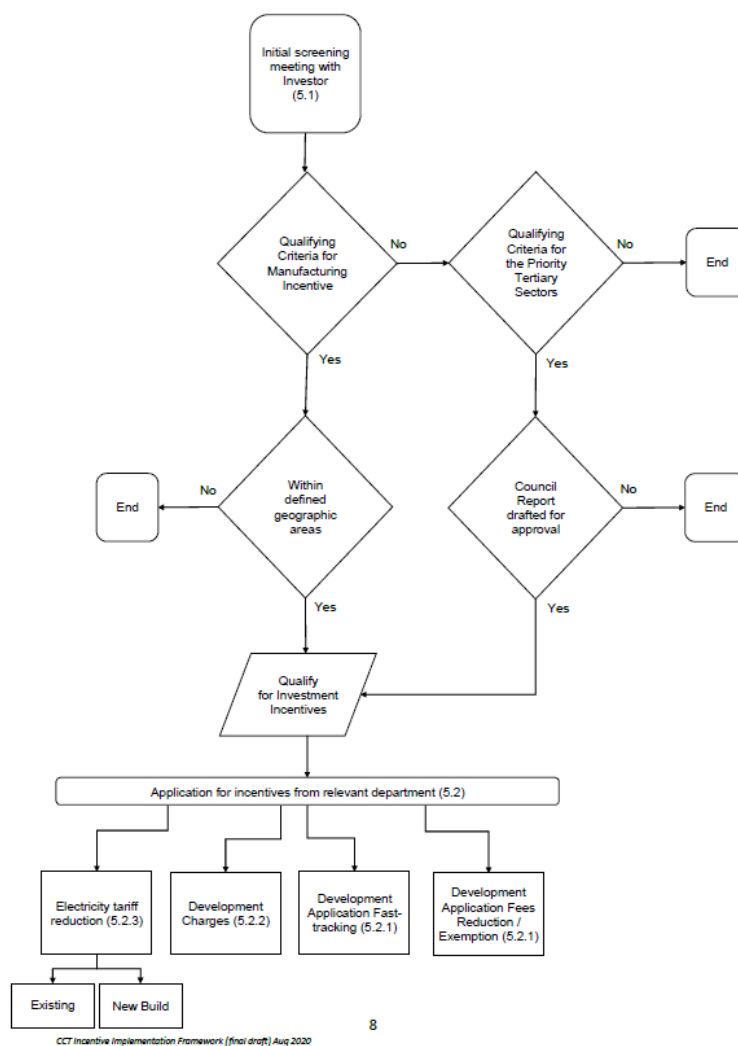


Figure 11: Application Process

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. •

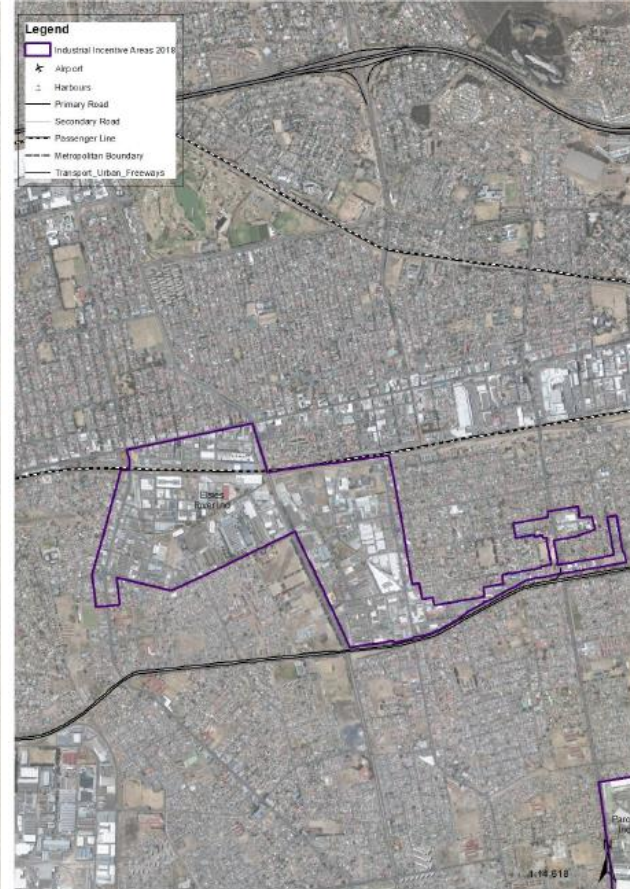
h) Targeted Areas

The following maps defined geographic areas for manufacturing incentives:

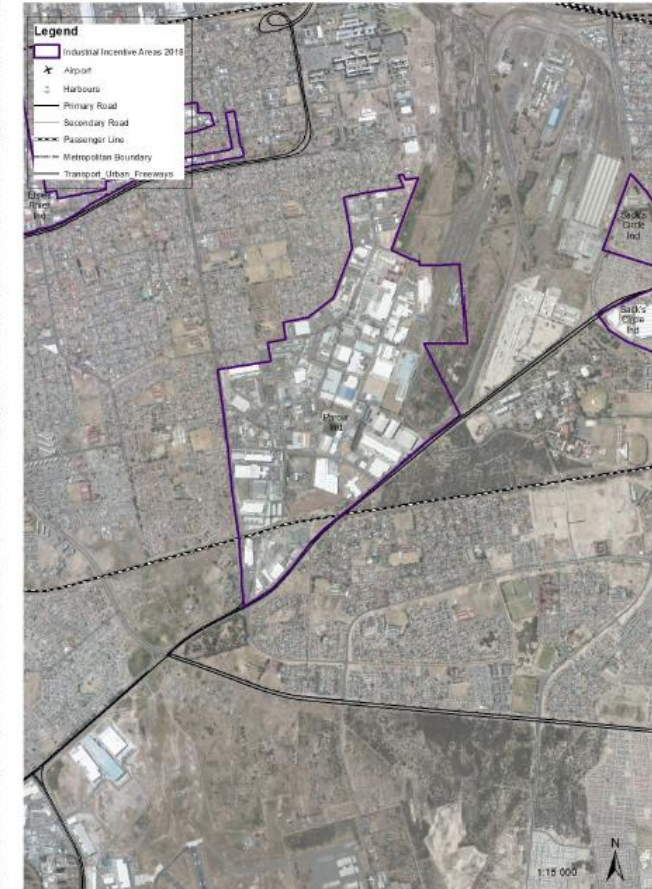
Atlantis Industrial Area



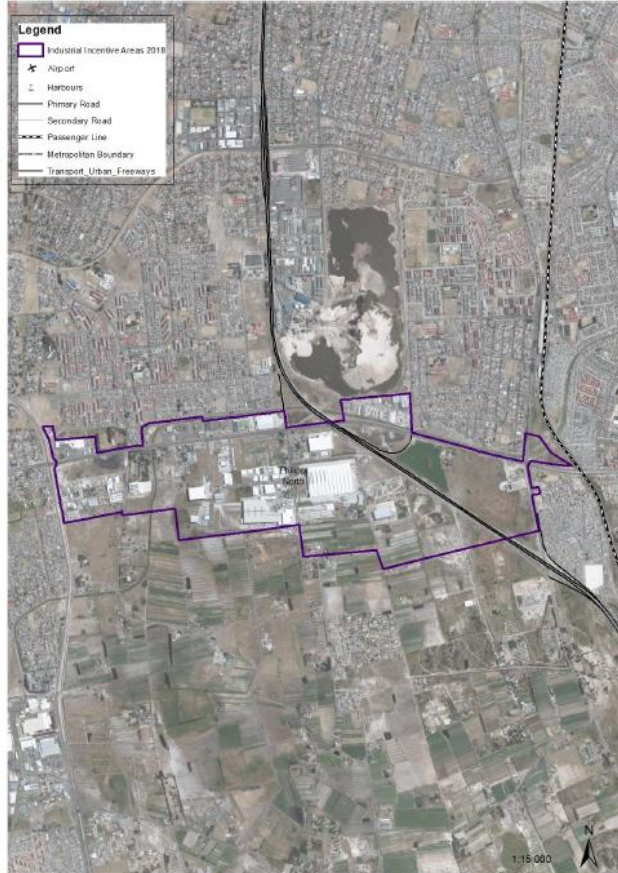
Elsies River



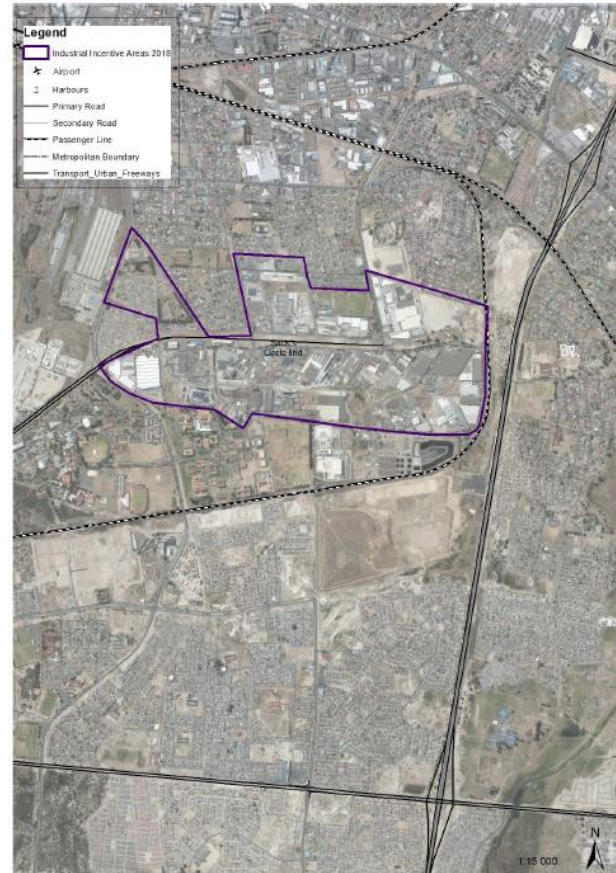
Parow Industria



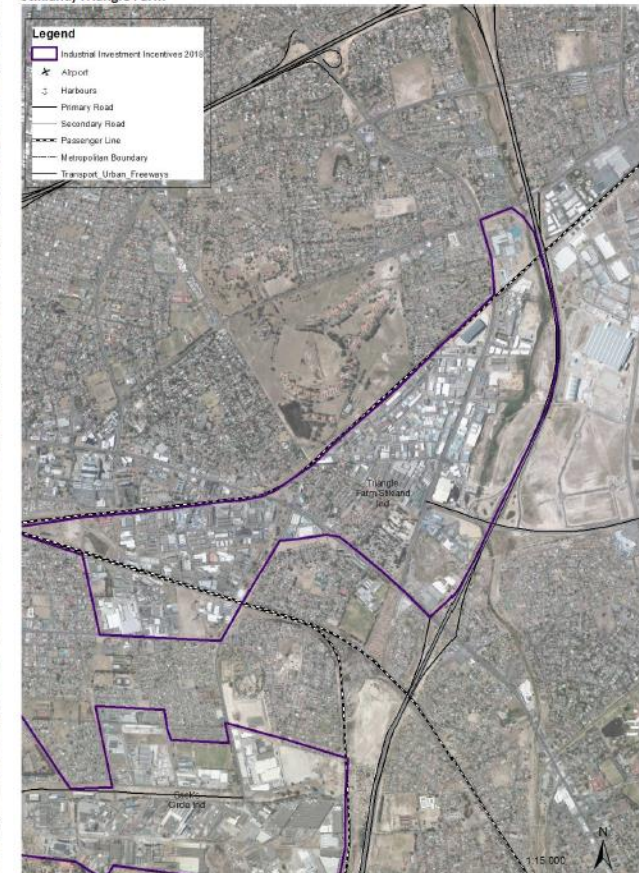
Philippi North



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).

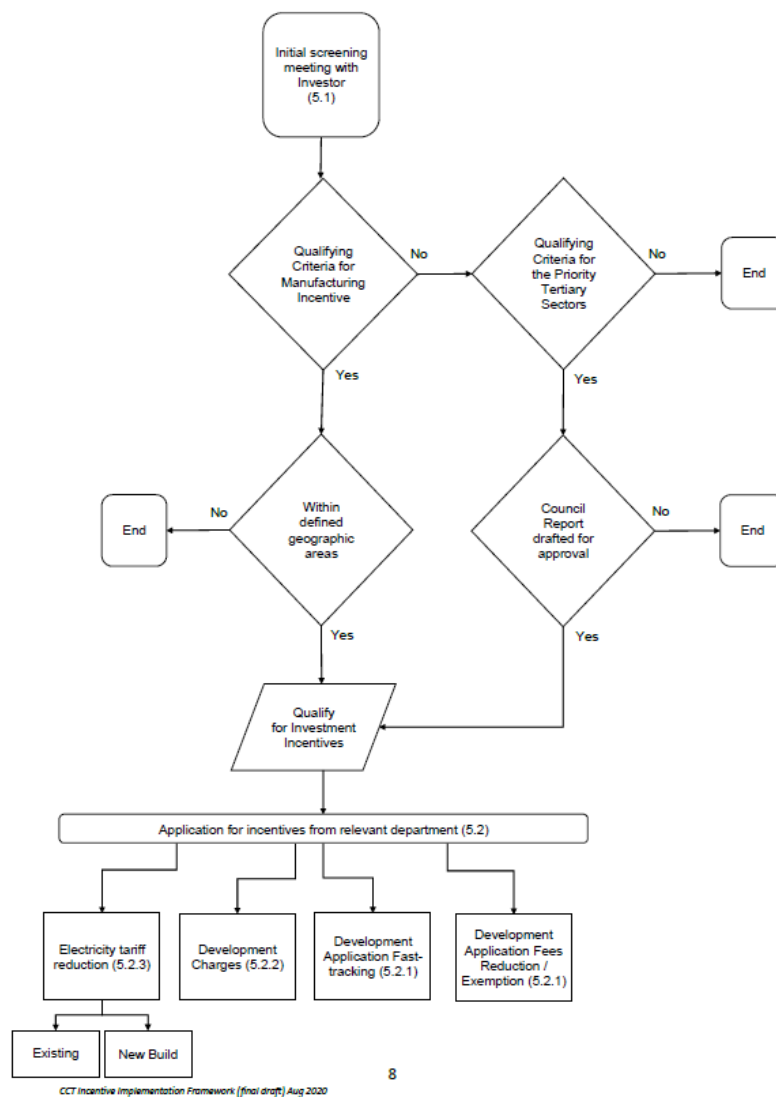


Figure 12 Application Process

g) Advantages and Disadvantages

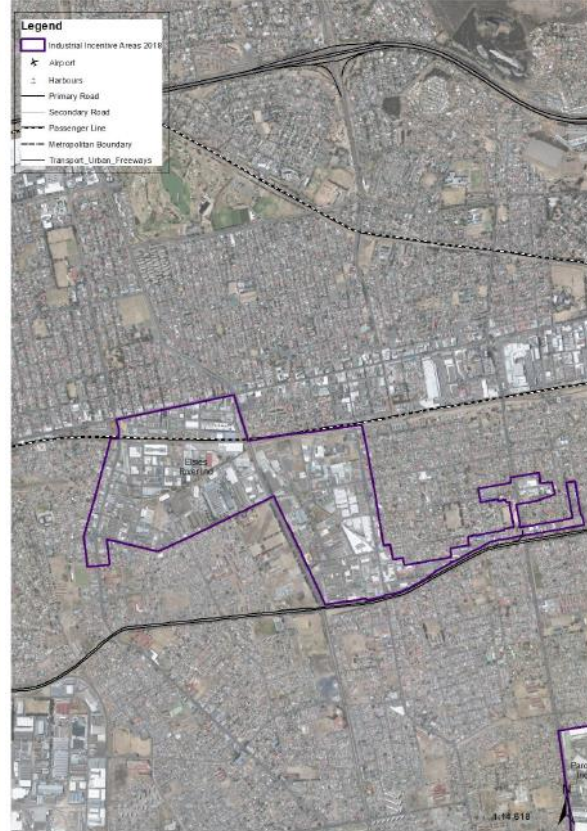
Advantages	Disadvantages
- Help mitigates financial risk to developer and marginally improves overall project feasibility. Compared to all local municipalities building plan fees are above average, but more than double compared to Johannesburg, Pretoria or Durban (commercial office is +- x3 more expensive) (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:

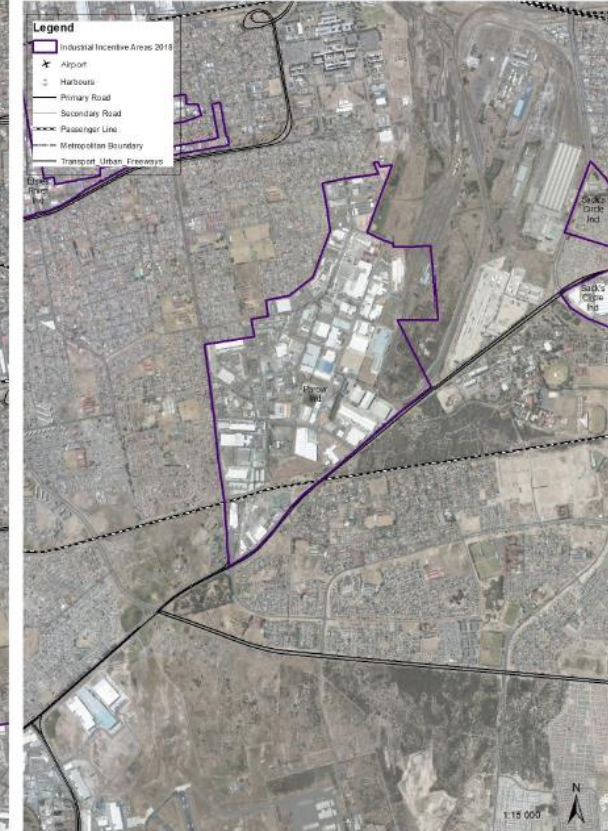
Atlantis Industrial Area



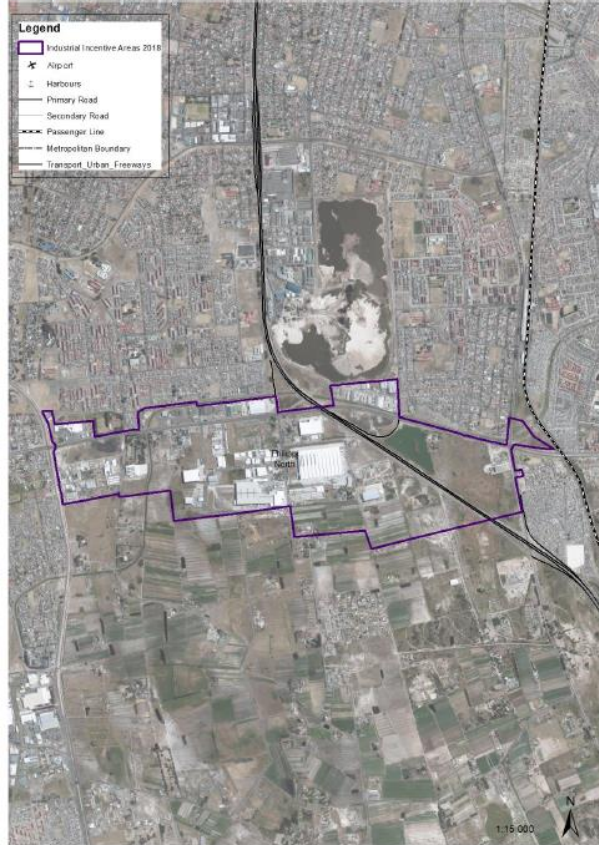
Elsies River



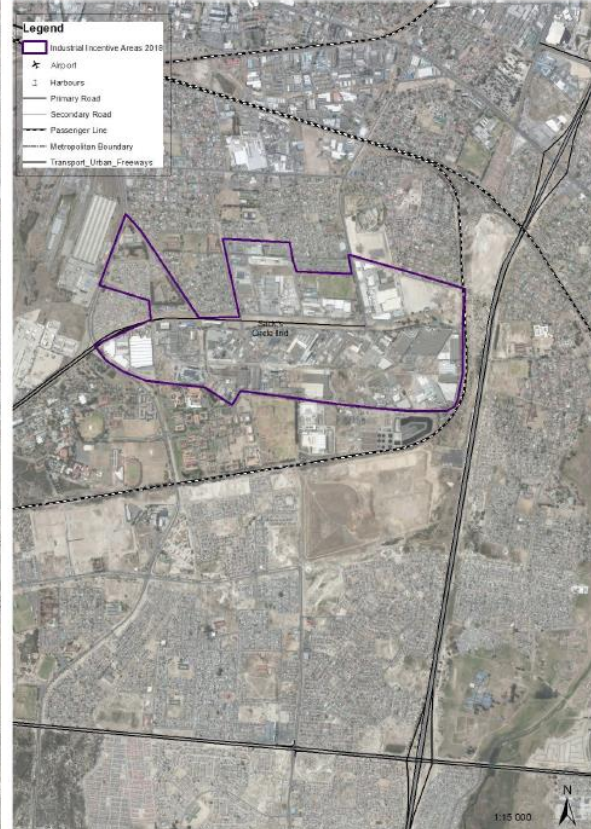
Parow Industria



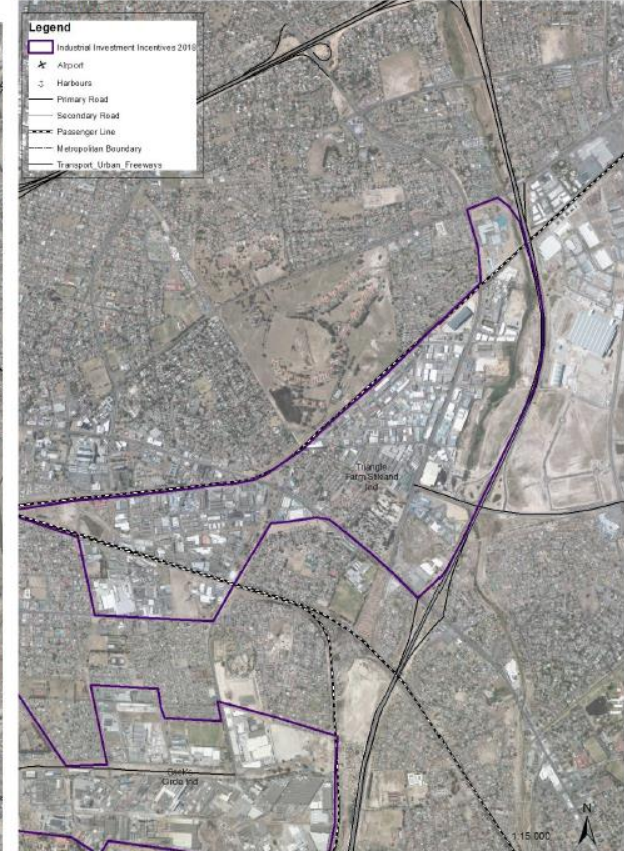
Philippi North



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).

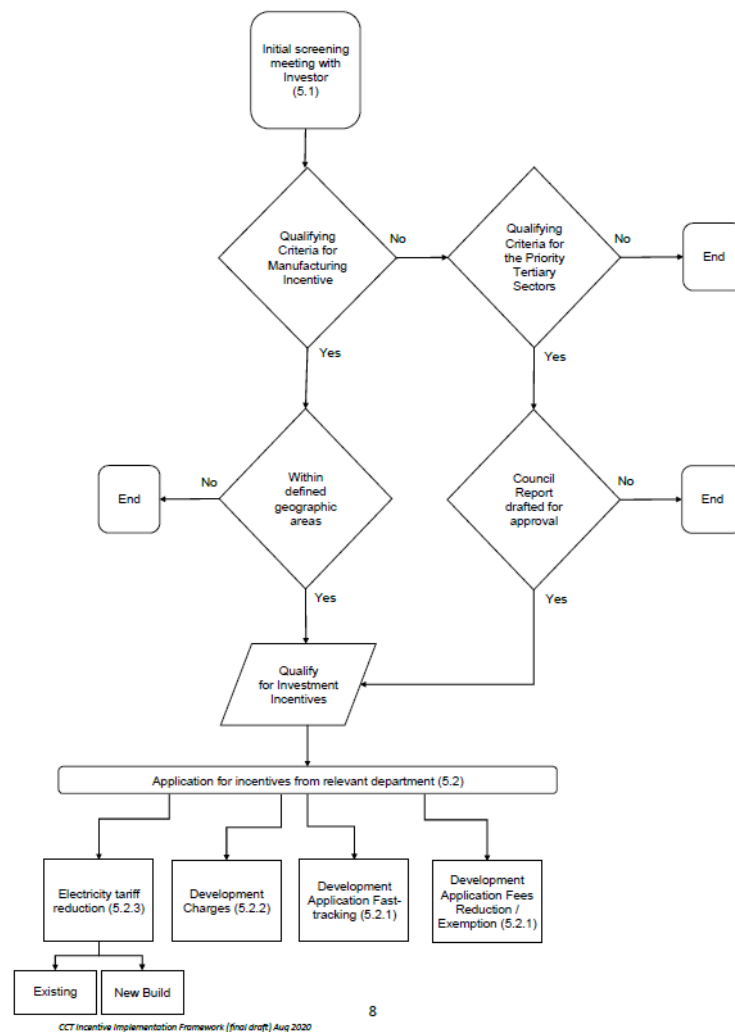


Figure 13: Application Process

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:

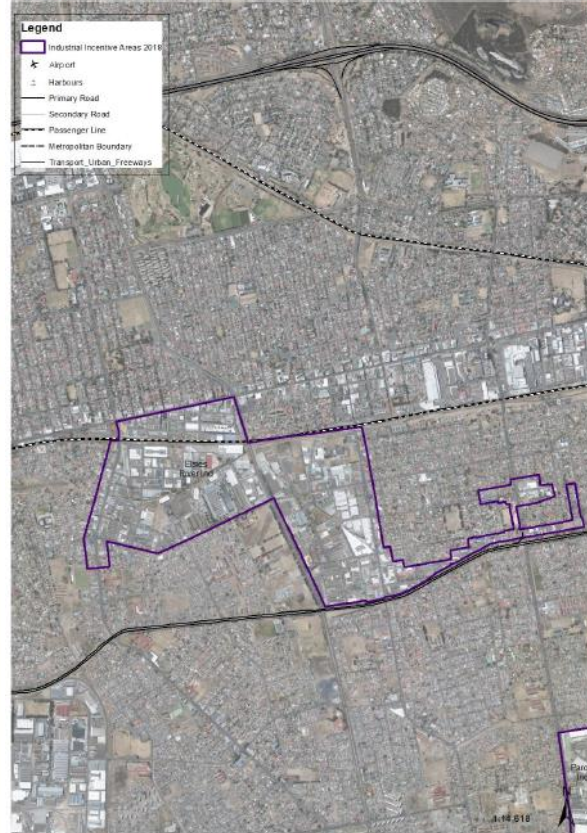
The following tertiary sectors have been identified of this incentive:

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

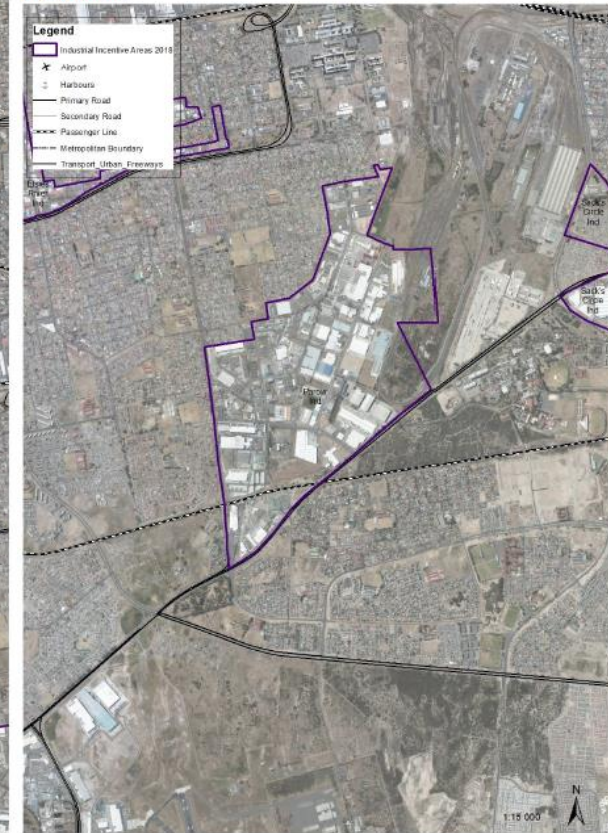
Atlantis Industrial Area



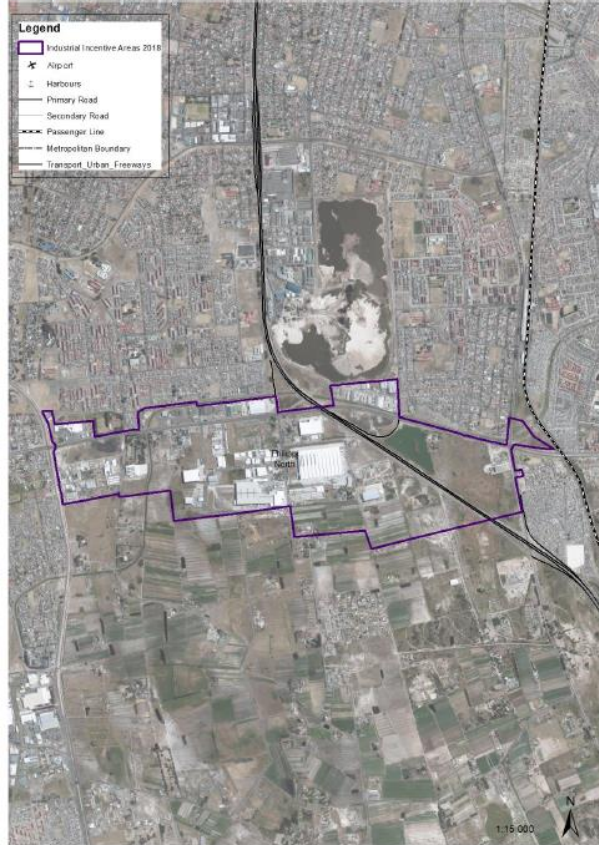
Elsies River



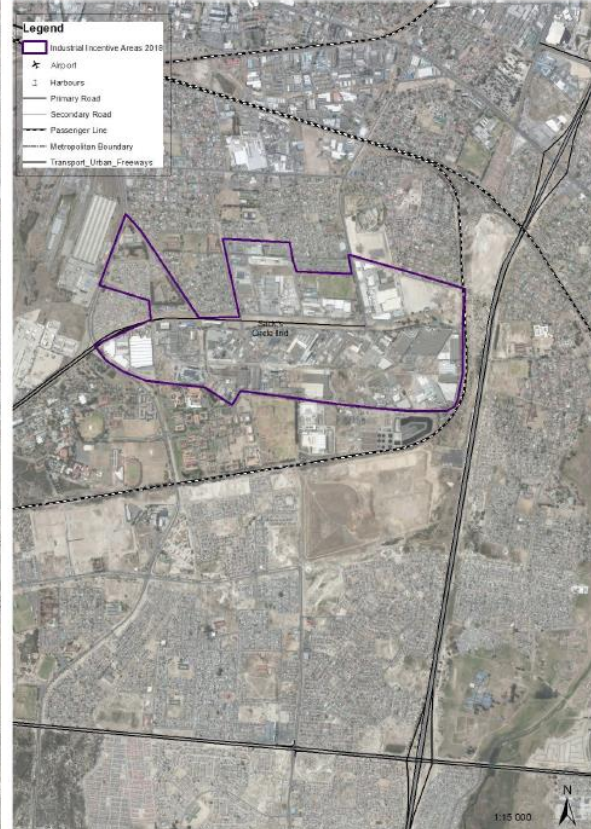
Parow Industria



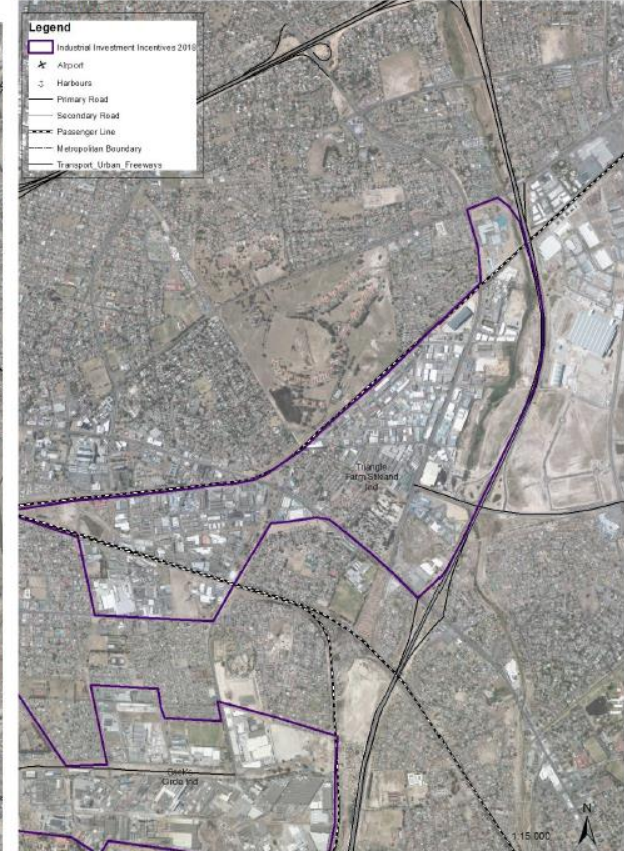
Philippi North



Sacks Circle



Stikland/Triangle Farm



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.

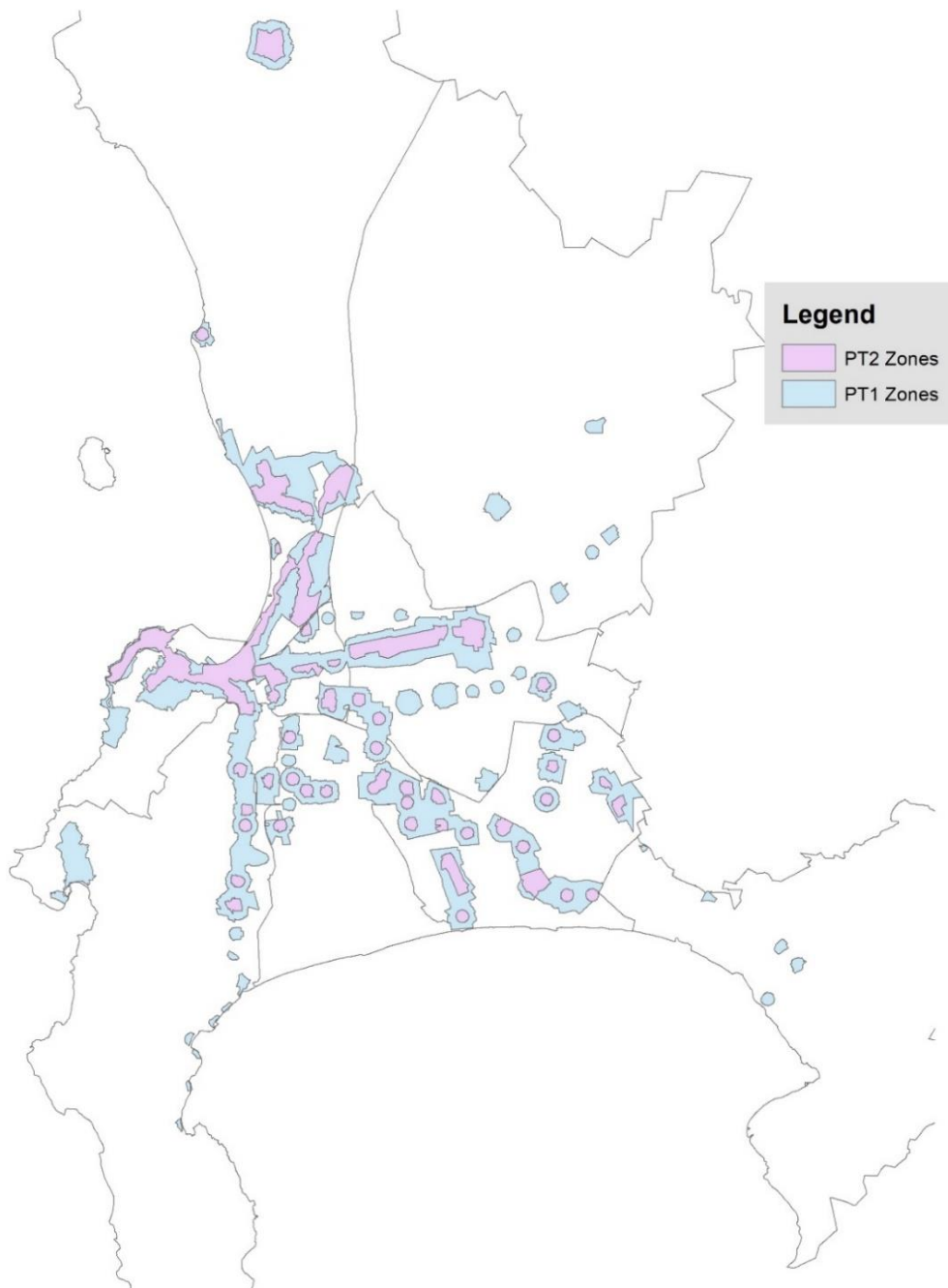


Figure 16: PT Zones

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.

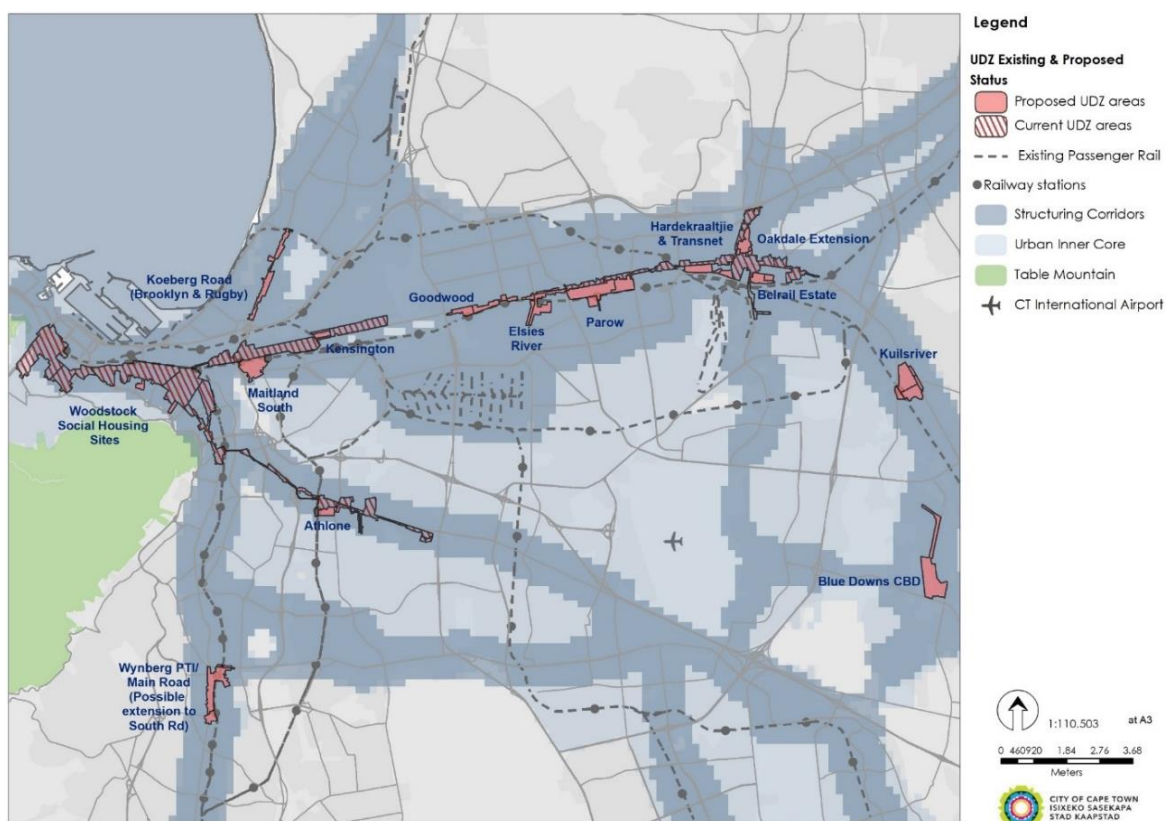


Figure 17: Existing and Proposed UDZ Areas within the City of Cape Town

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.

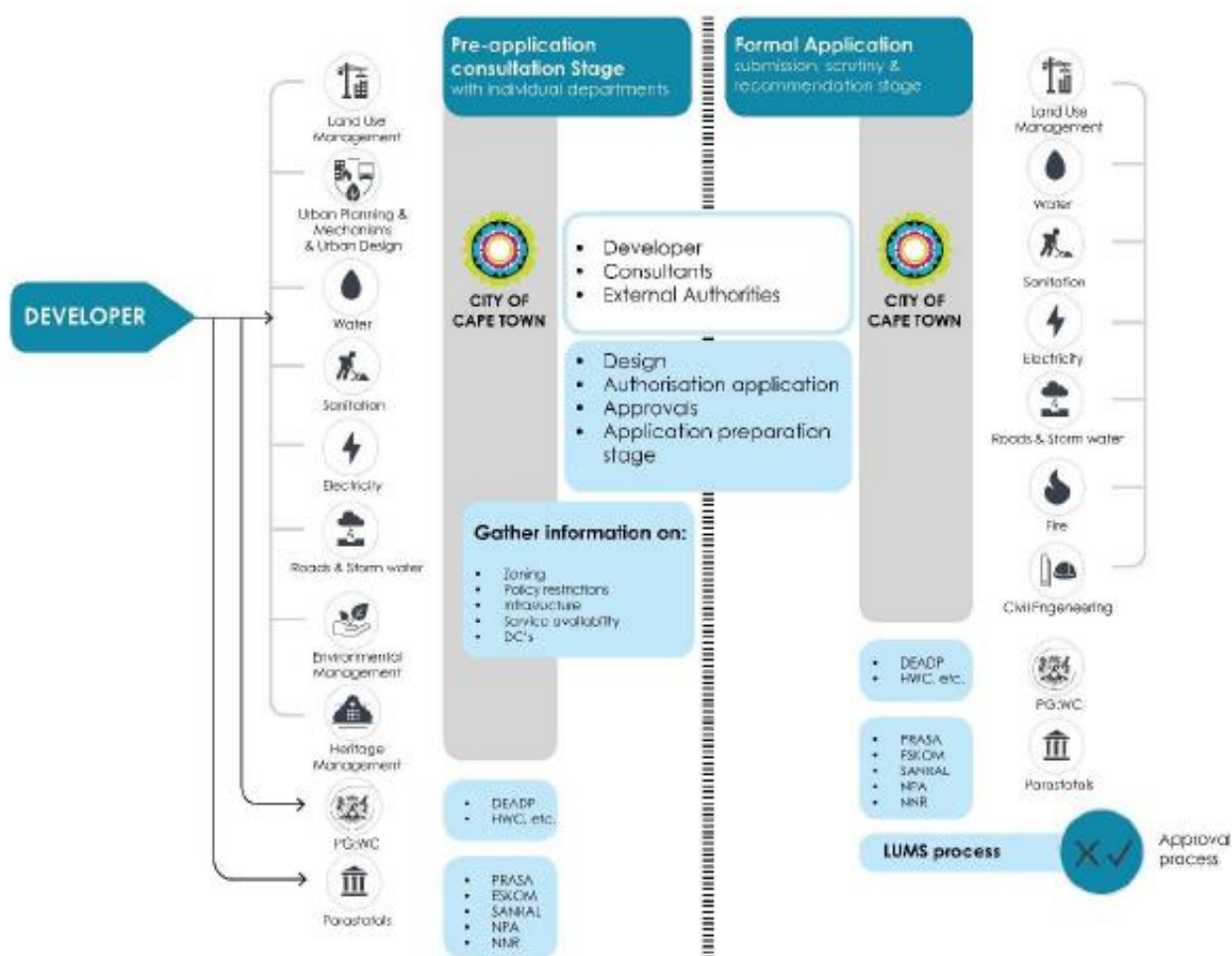


Figure 18 Depiction of a typical development application process

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

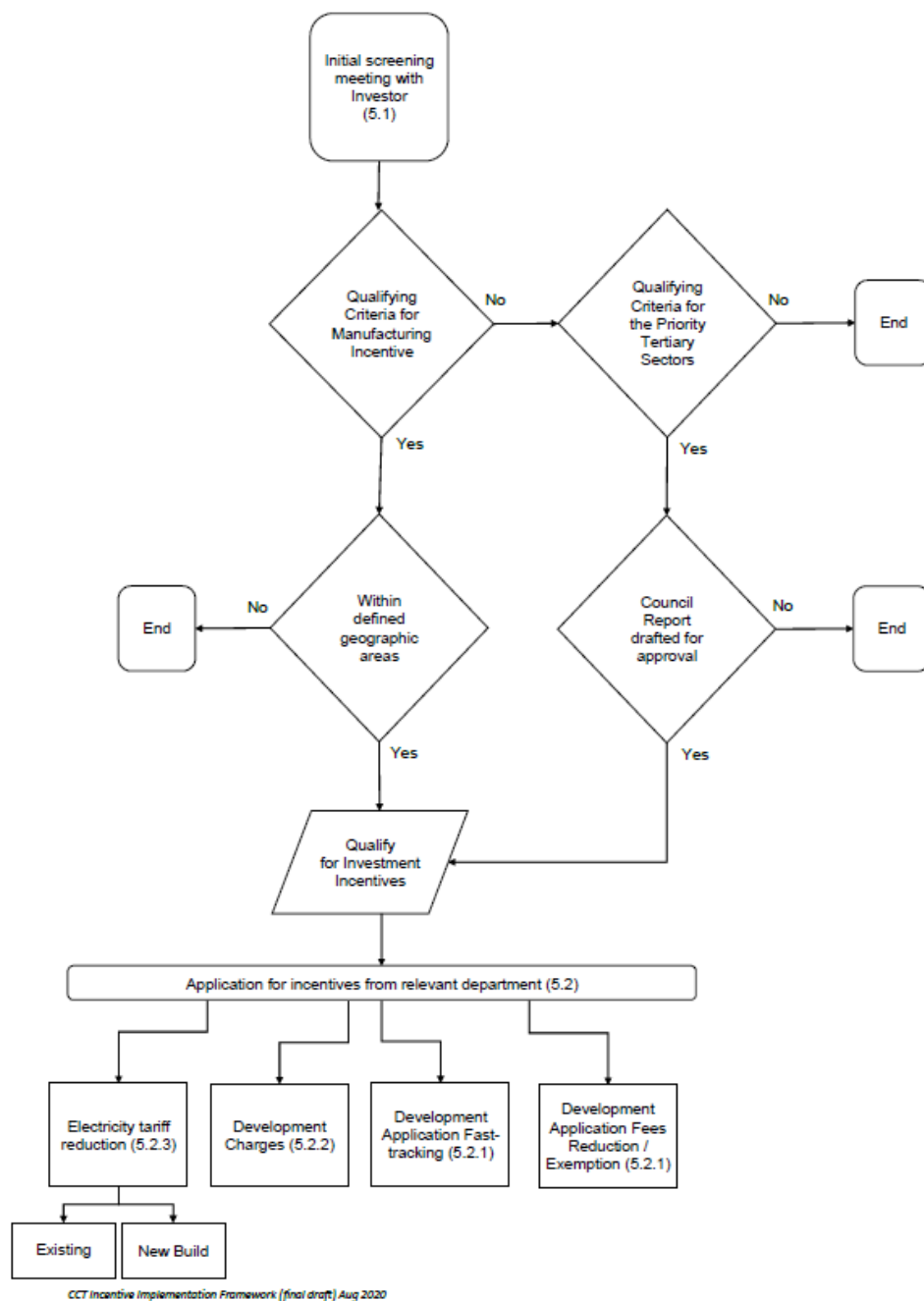


Figure 21 Application Process

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.

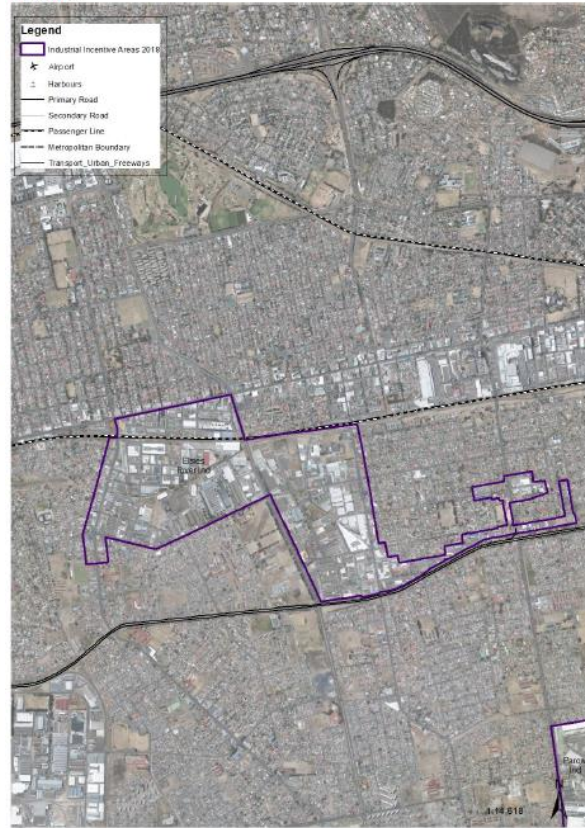
h) Targeted Areas

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:

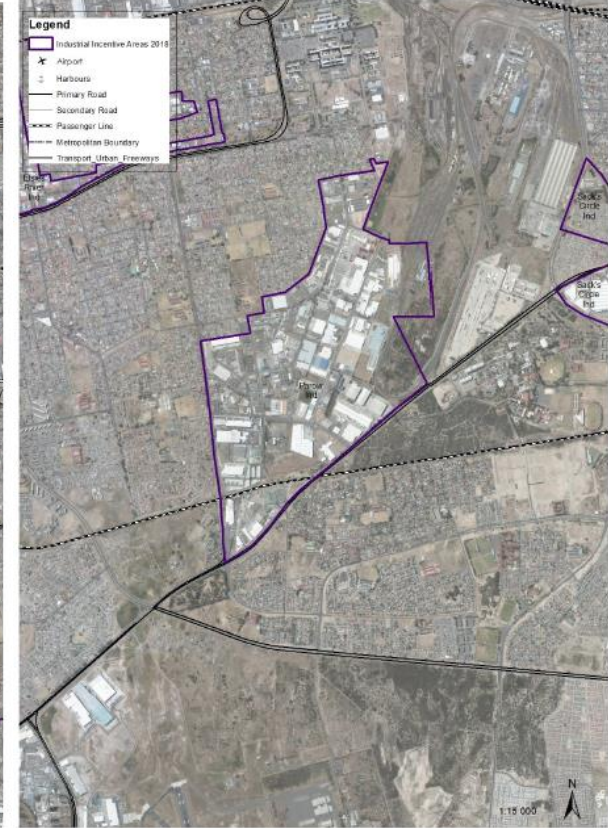
Atlantis Industrial Area



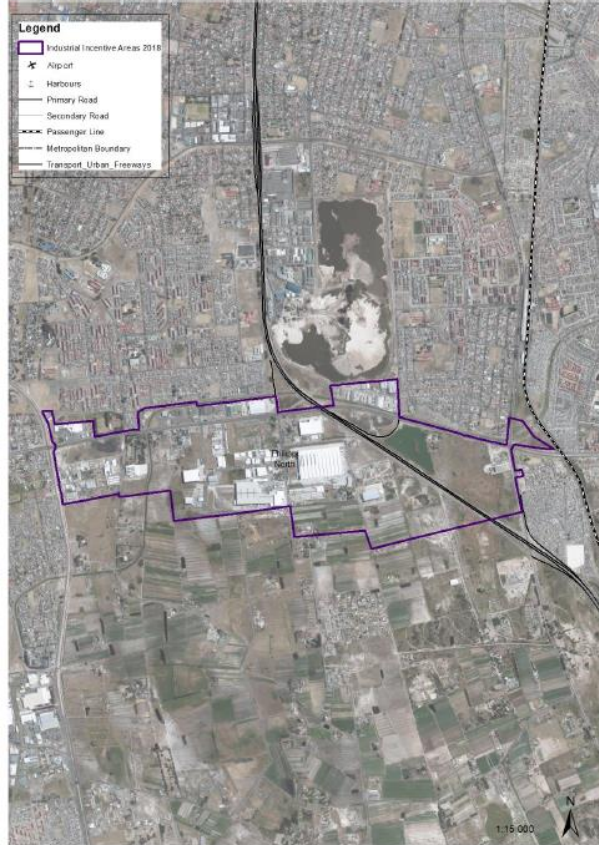
Elsies River



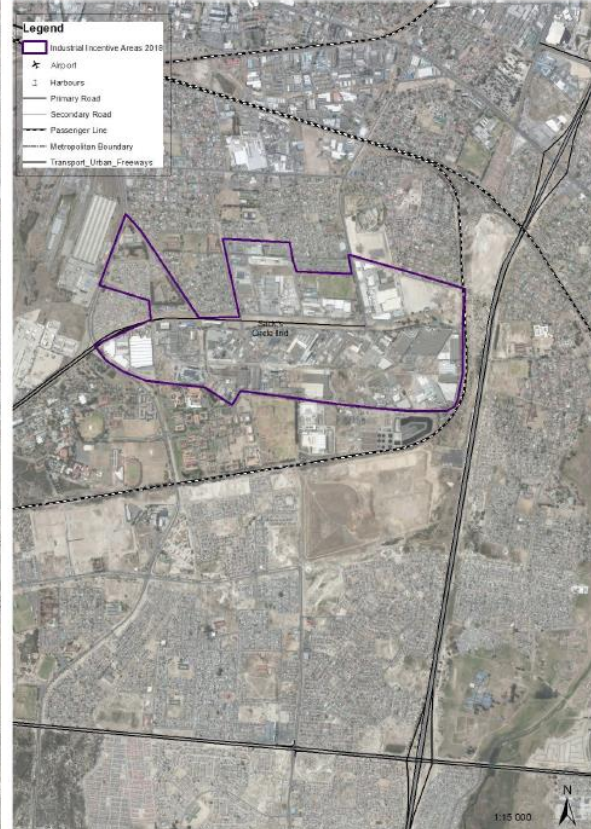
Parow Industria



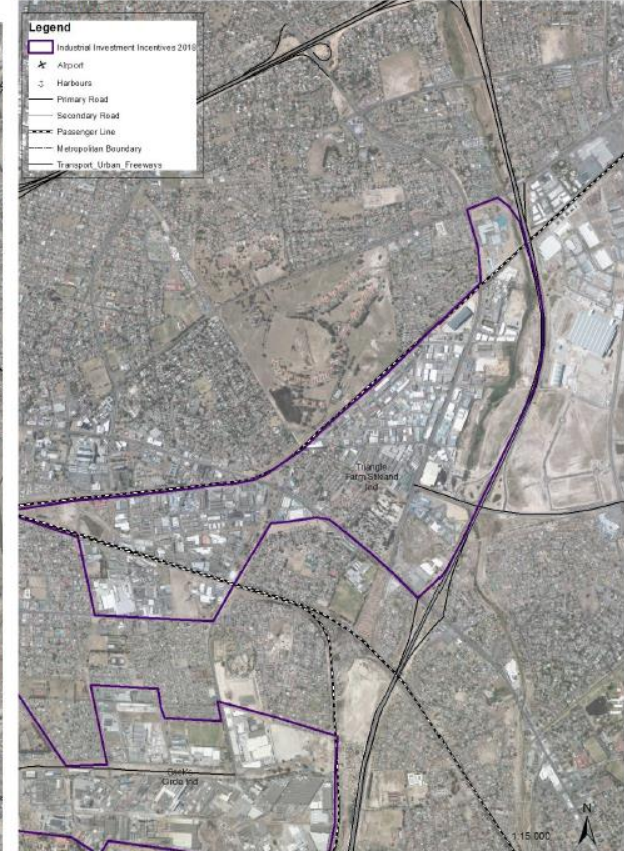
Philippi North



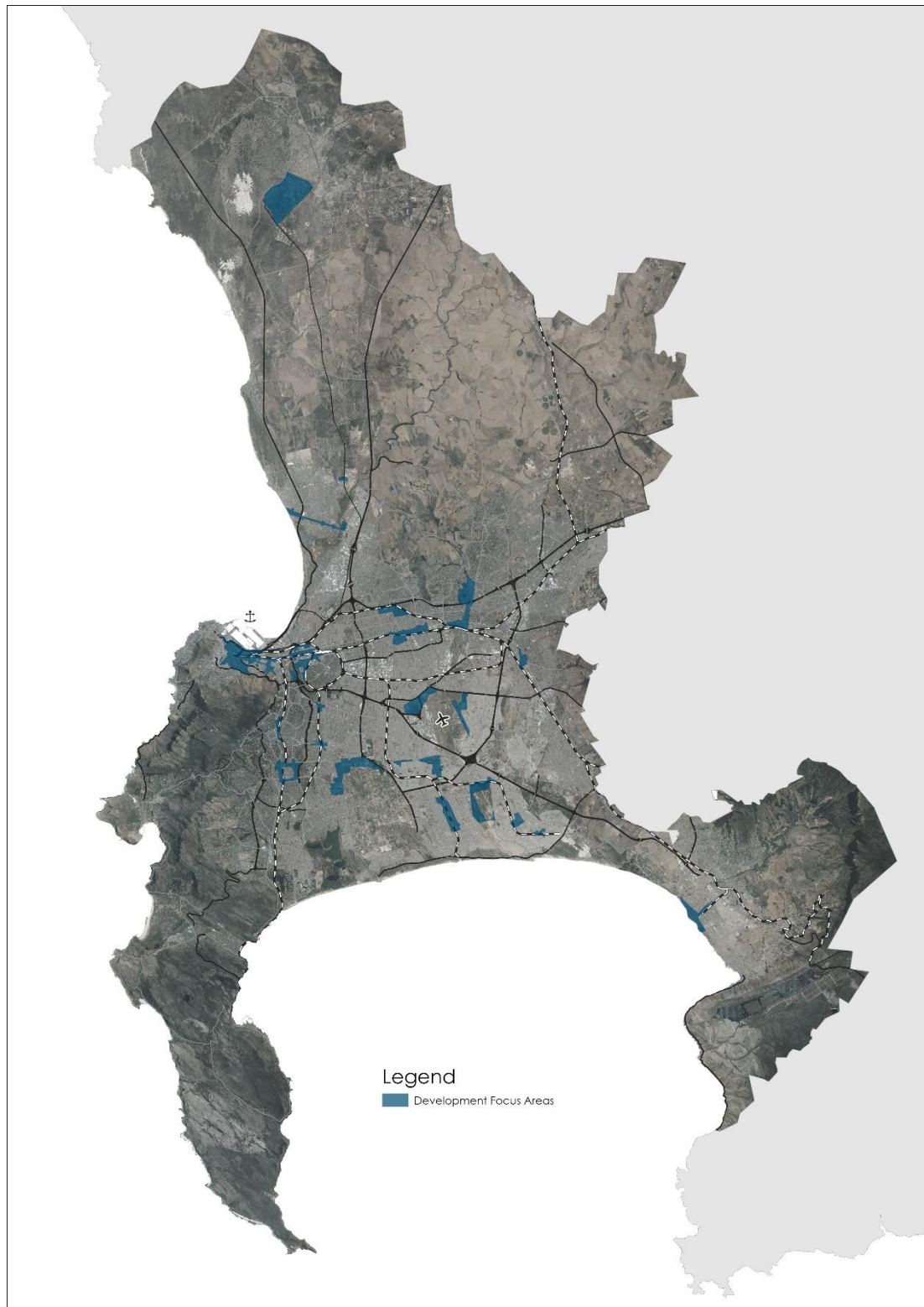
Sacks Circle



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.

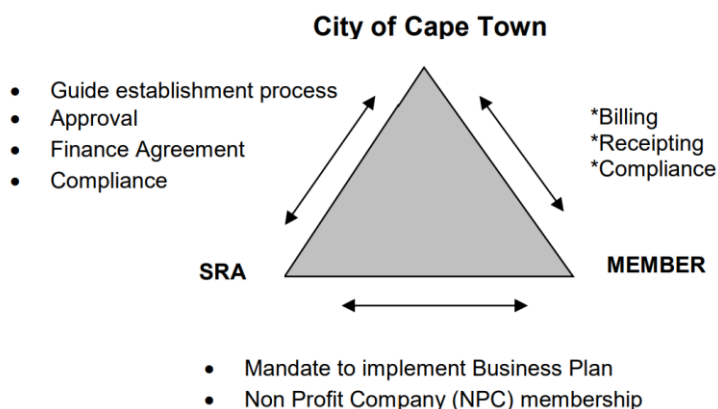


Figure 22 Overview of the relationship between the City, SRA and the member.

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

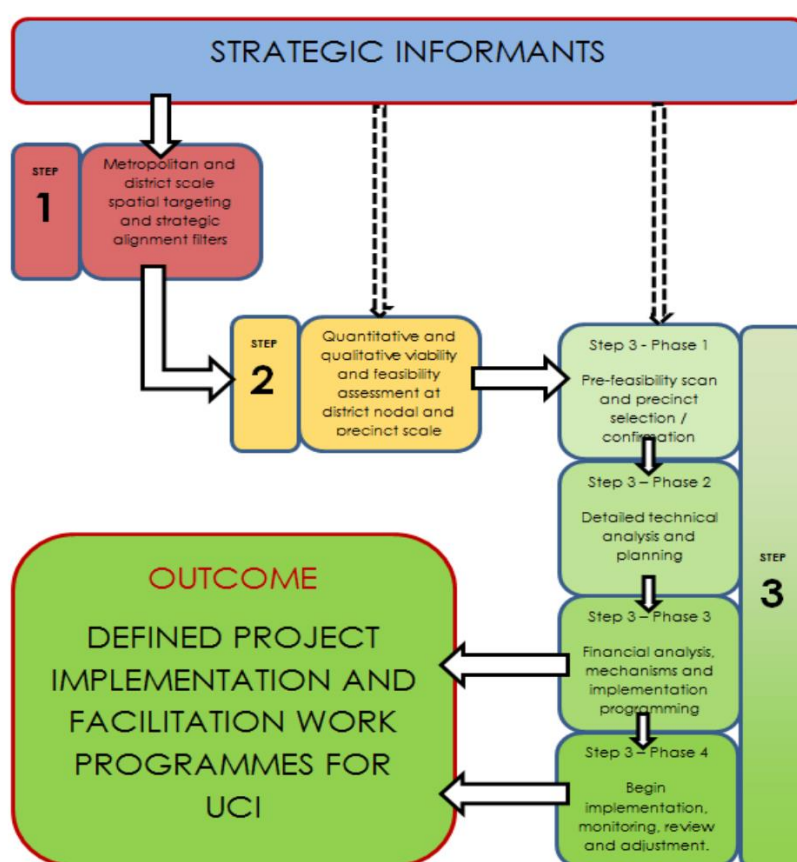


Figure 23: Overview of the CLDP Methodology

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

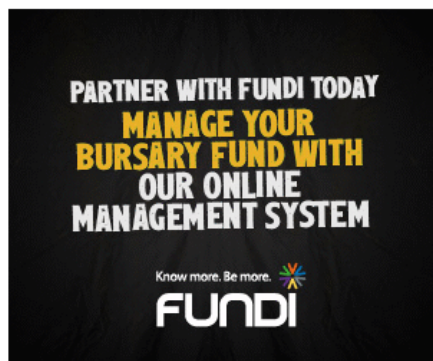
City land lying unused three years after R400m purchase

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."



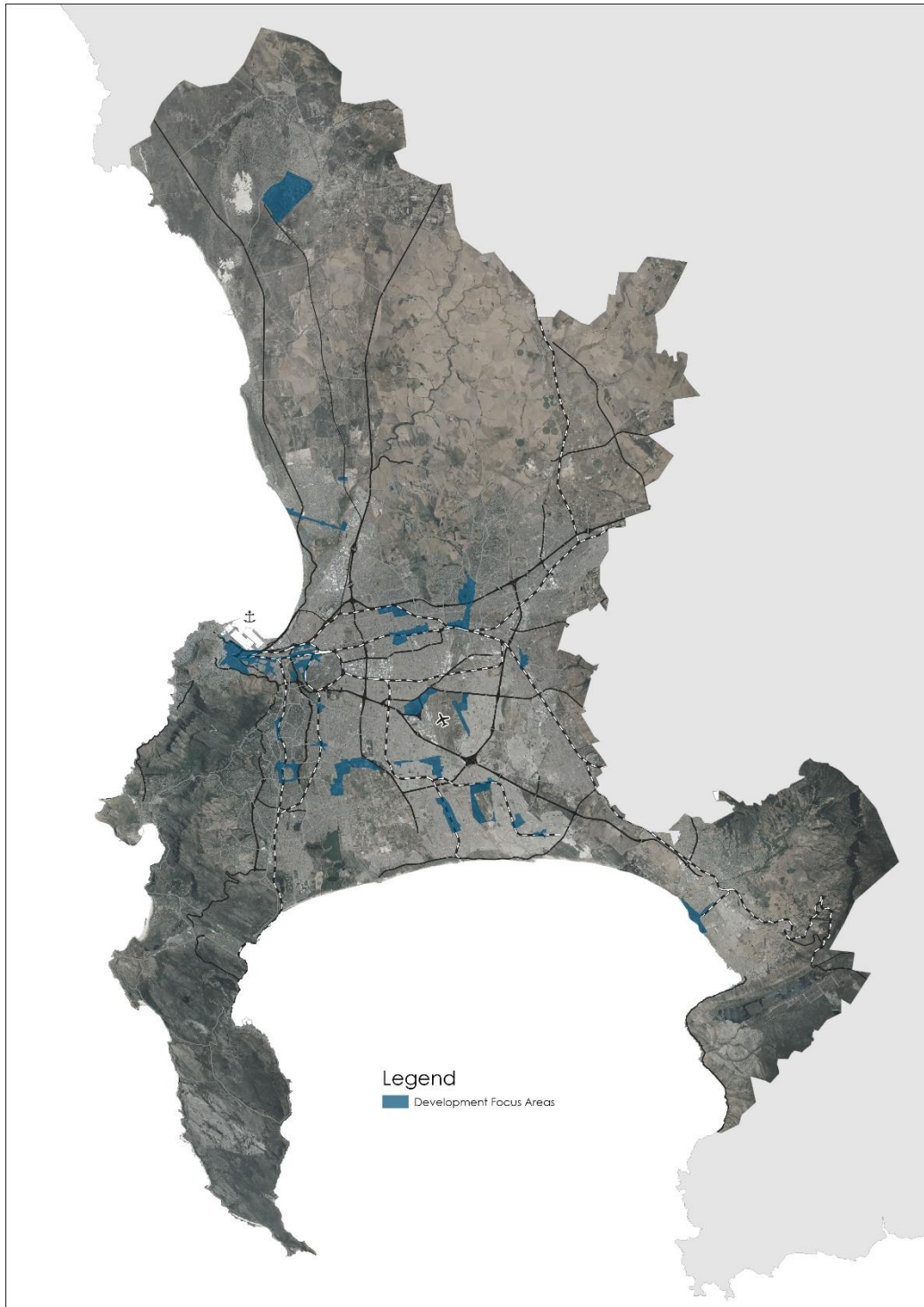
Leppan said the area was struggling with massive infrastructure problem in that there was a shortage of houses and schools.

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 programme 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.

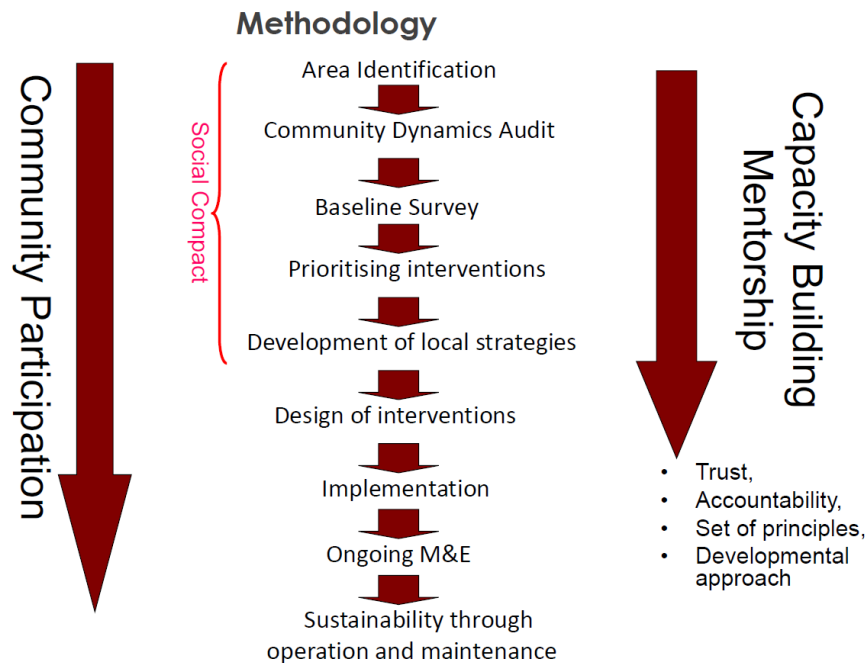


Figure 24: Methodology

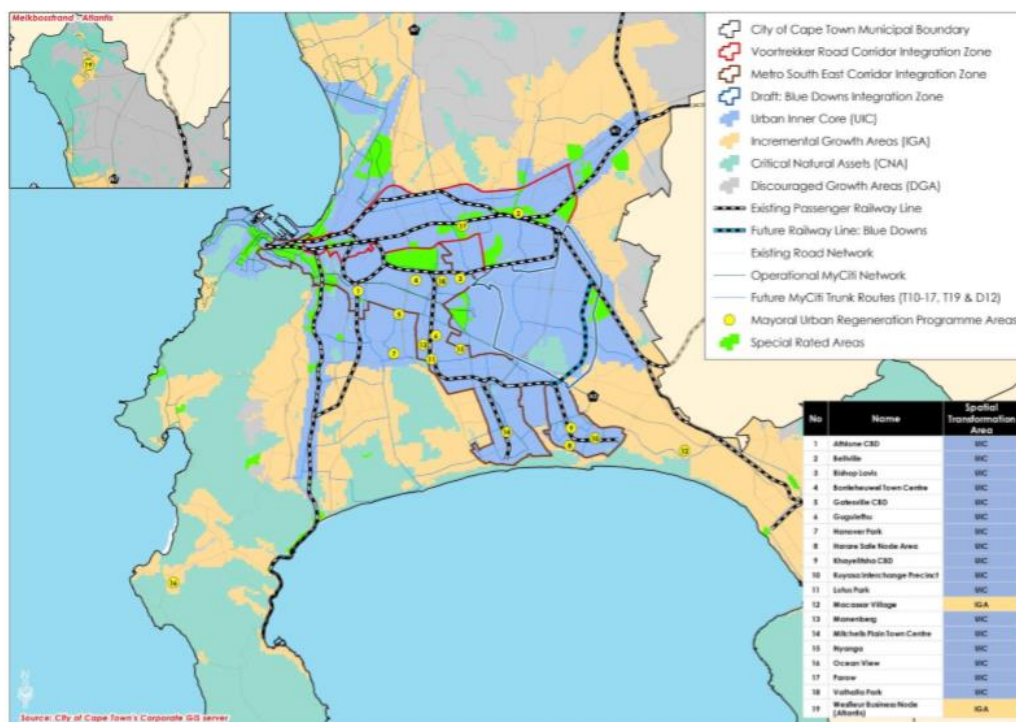


Figure 25: MURP Areas

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.

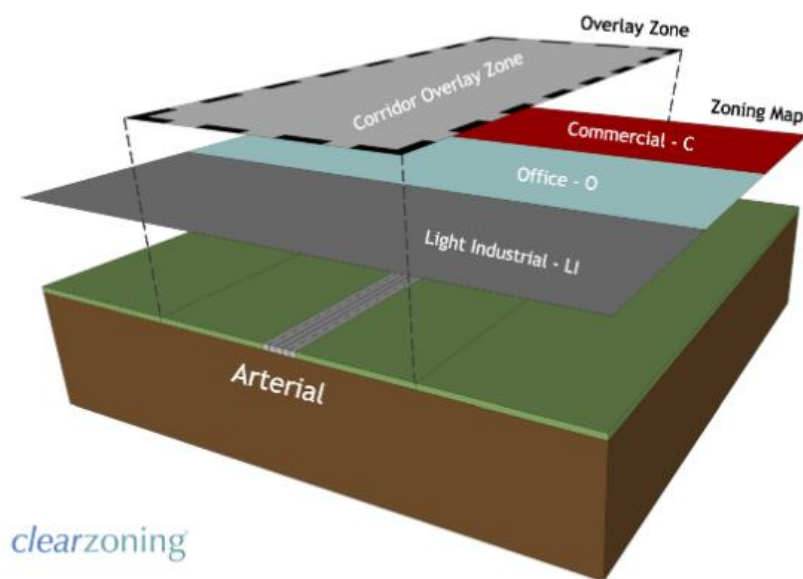


Figure 26 Applying an Overlay Zone

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

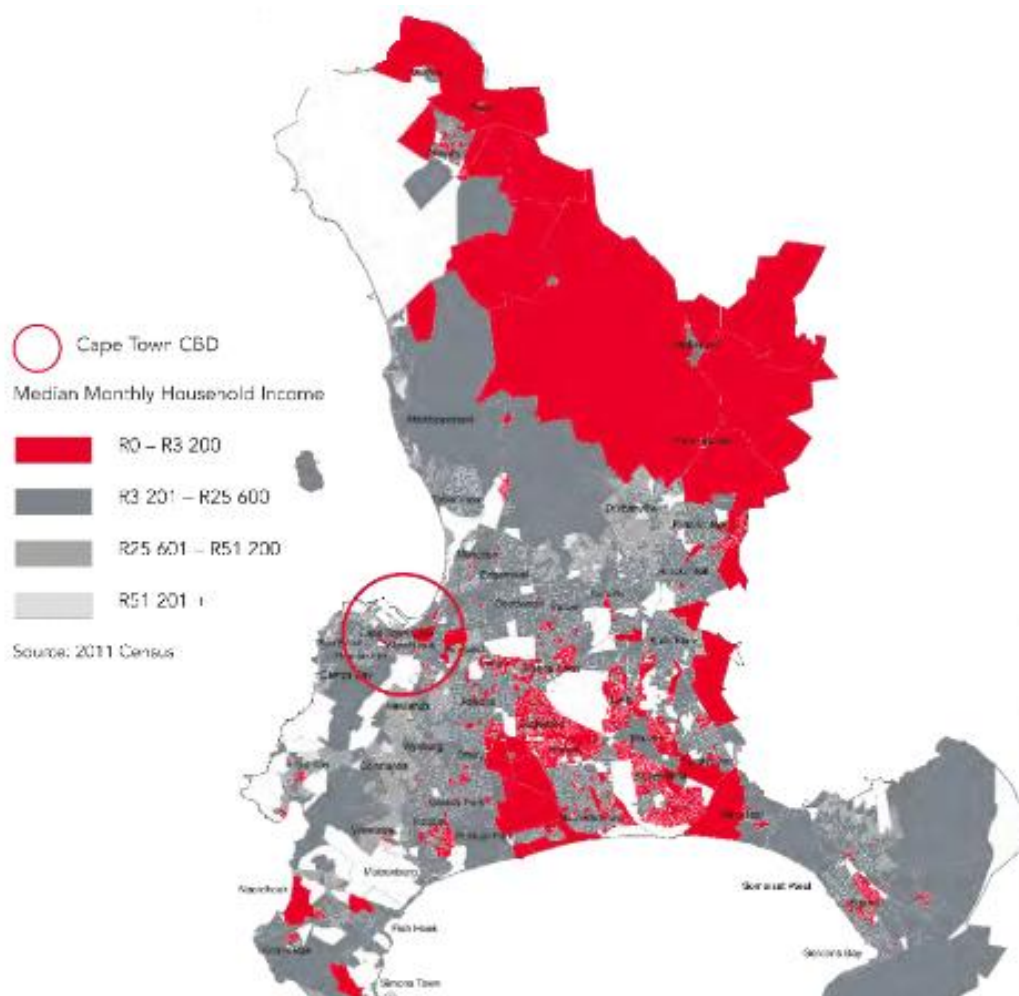
Advantages	Disadvantages
• Does not require capital investment by the City. • Is a step towards addressing housing backlog • Enables spatial justice in land use decision-making • Increases supply in affordable housing • Inclusionary housing can contribute towards the City's density objectives	• Is not 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

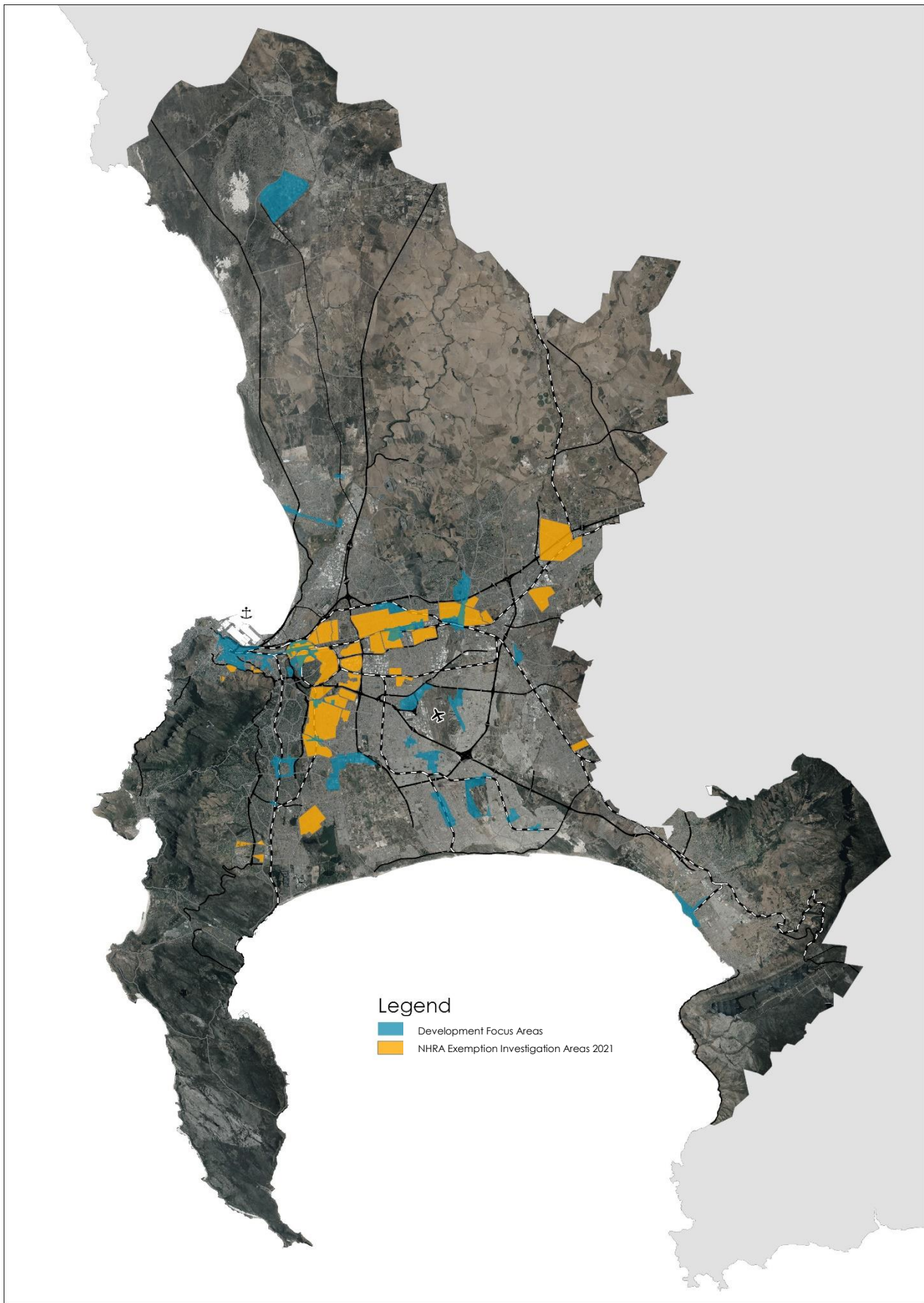
h) Case Study: Parow

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.

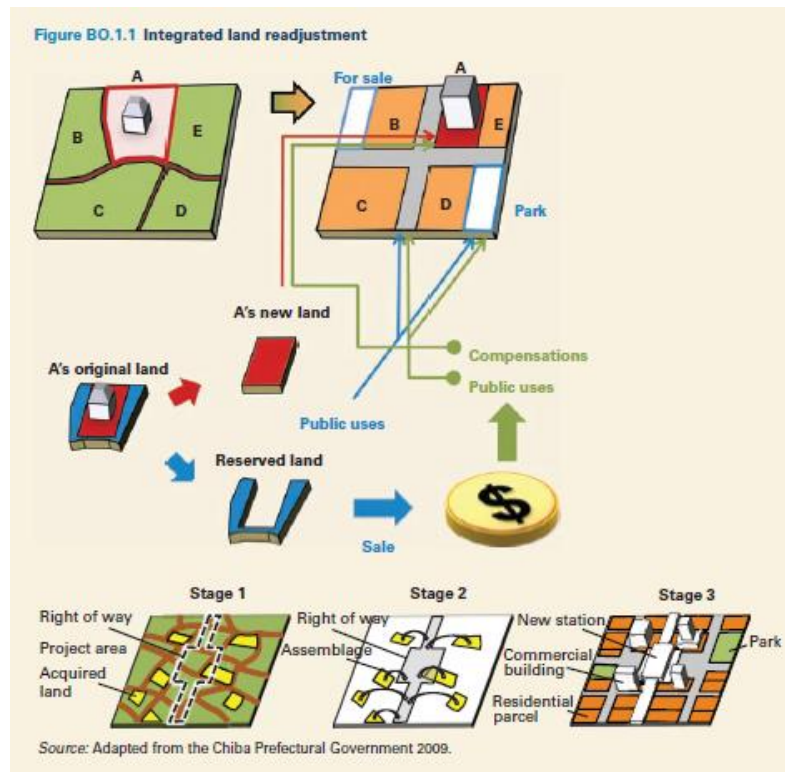


Figure 27: Land Readjustment Scheme (Worldbank, 2015)

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)

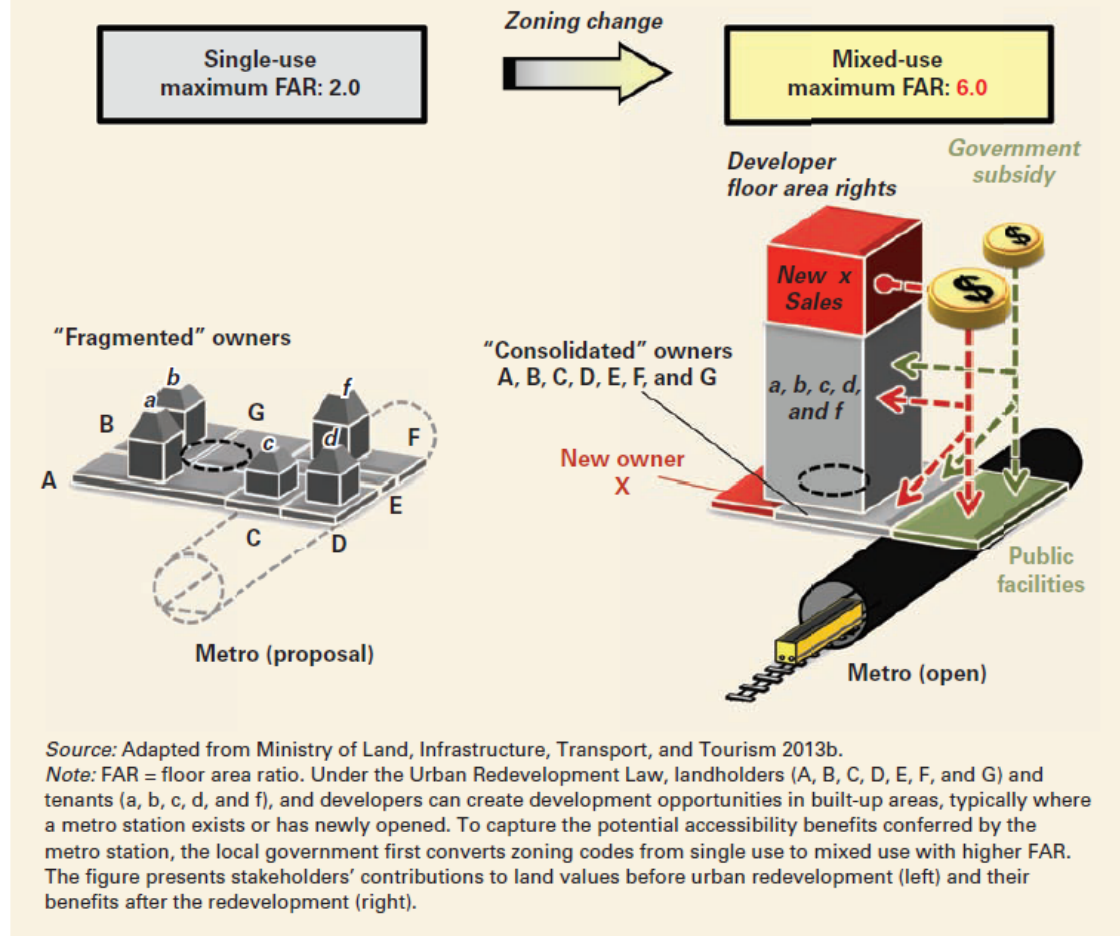


Figure 29: Urban Redevelopment Scheme (Worldbank, 2015)

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)

- 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)

- 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.

- 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).

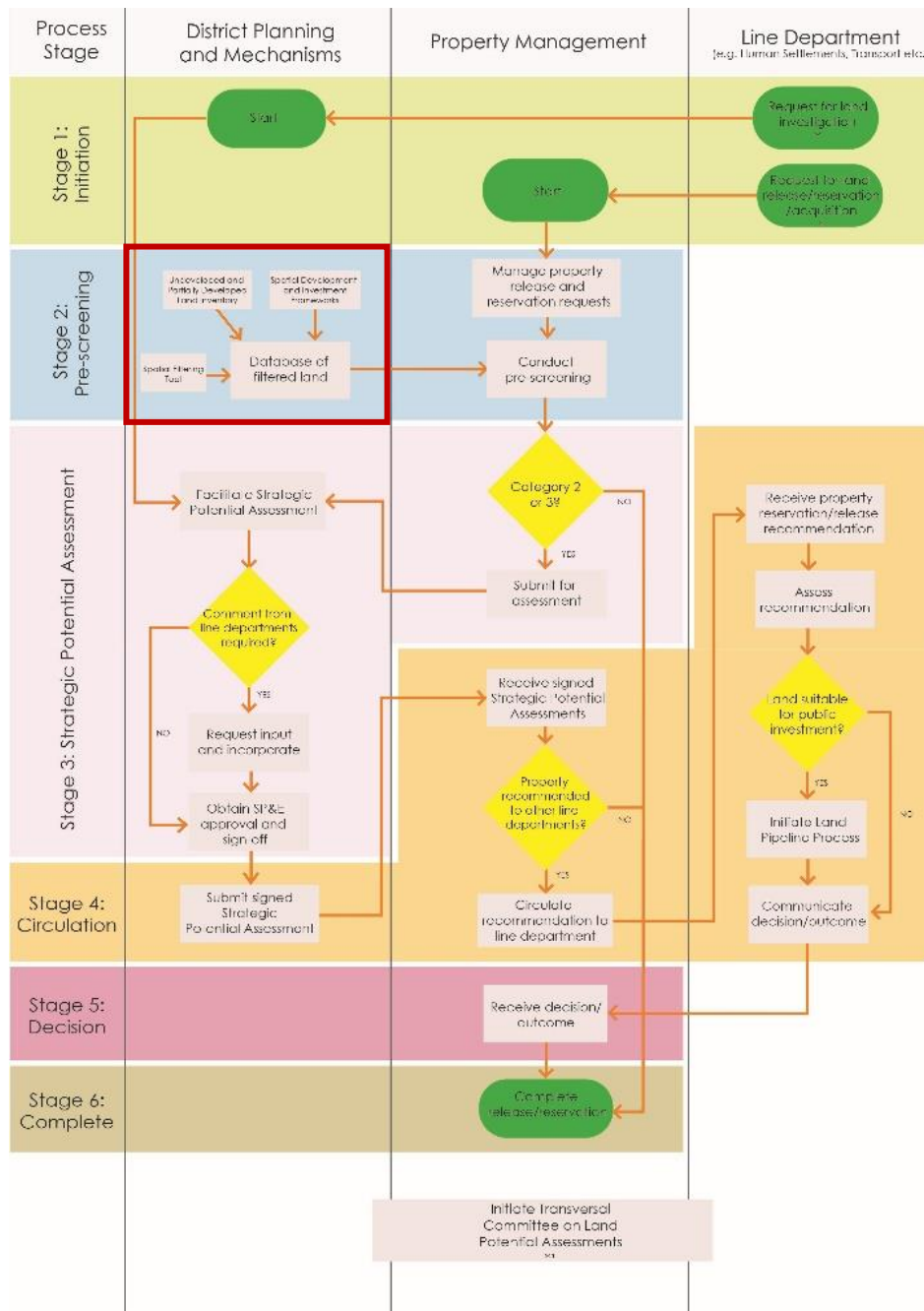


Figure 30: Land Identification Protocol Process Diagram

CITY OF CAPE TOWN LAND PIPELINE FOR PUBLIC INVESTMENT

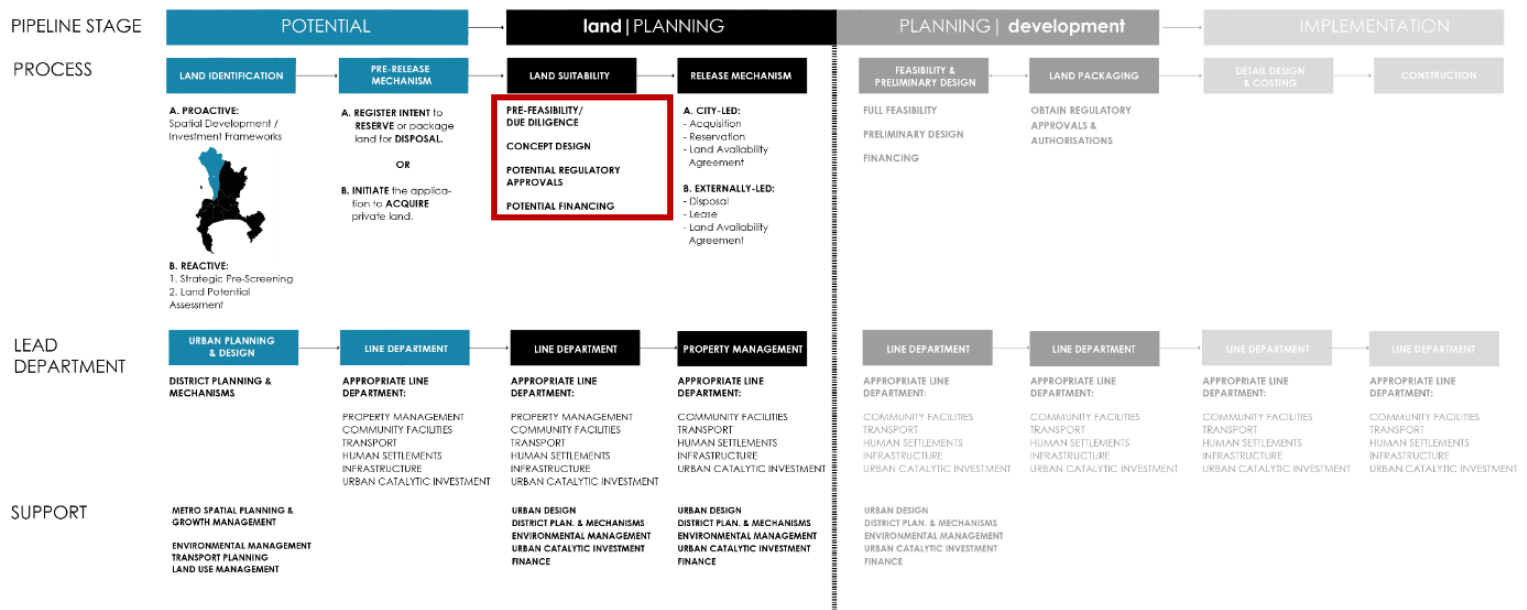


Figure 31: CoCT land pipeline for public investment

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.



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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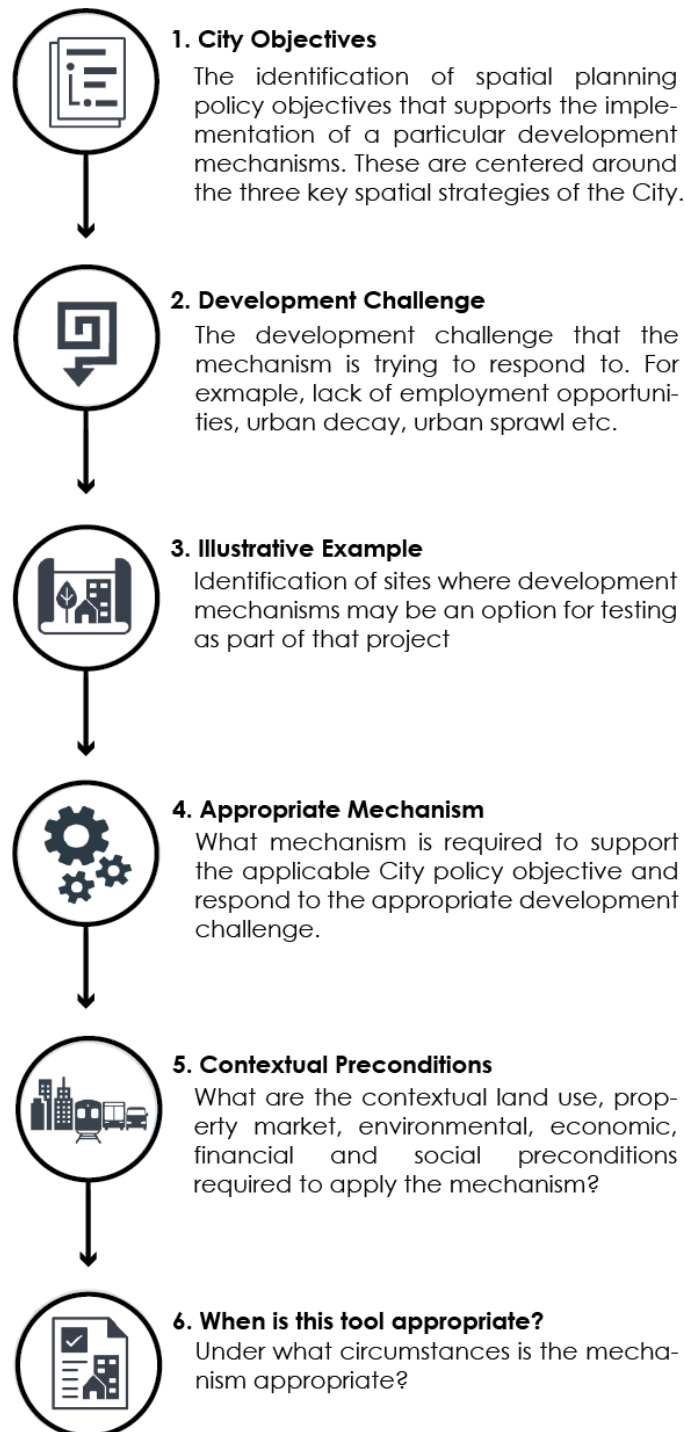
Porsche Approved

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.			✓
	NDA's which intersect with environmental resources	- NDA's 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. - NDA's 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: PUBLIC COMMENTS AND RESPONSES

Comments and Responses on Integrated District SDF - EMF advertised 6 June - 30 August 2022				
Admin	Comment summary/contents			Response and Action
Nr	Comment summary/contents	District Plan Overall Theme/ Common Concerns	District Plan Sub theme	Response
1	1. Houmoed Road, Kommetjie Road and the expansion of the smallholdings between Masiphumelele and Kommetjie Road	SDF/EMF	Transport and Route Desan.	Noted(?)
1	2. The significance of the corner of Houmoed Extension and Kommetjie Road corner as a future node have been ignored in this plan.	SDF/EMF	Urban Development	Include a Neighbourhood node here - to align with local area planning as per the draft Masiphumelele SDF
1	3. Expansion of Masiphumelele and population size. How can the District Plan promote low density residential development in the smallholder area next to Masi when there is clearly a dire need for medium density mixed use development, houses and jobs in the local area?	SDF/EMF	New Dev. Areas	The District Plan should not be advocating further low density housing - and it is acknowledged that the current map designation is misleading. Hence this designation is to be changed , but with additional writtent guidance. Future residential uses should ideally contribute to widening the range of housing types in the Far South area (re- residential types that 'bridge' between existing Masiphumelele housing and wider surrounding housing).
2	Object to Dev of Fish Hoek Sport Field We are currently objecting to another development within this floodplain at 24 Carlton Road, erf 17336, Fish Hoek, which will have a major impact on water infiltration	SDF/EMF	New Dev. Areas	There should be no reason why, if appropriately undertaken, a development on a (small) part of the Fish Hoek sportsfields (specifically towards enhancement of these sports facilities) should compromise water infiltration in this area. Any proposed development would have to follow all due (legal) processes for approval. See also responses elsewhere (below) to objections to development on the sportsfields.
2	Please stop permitting developments of contiguous gated communities as they are not conducive to being a "walkable city" in Section 3.2 Guidelines for transport infrastructure and route designations, due to safety reasons (not being able to be seen or heard when walking between these high walls and with no escape).	SDF/EMF	Urban Development	Whilst gated villages are opposed in-principle in policy, these are response to an increasing reality re-security. Careful consideration should be given as to how these are considered in future.
2	Fish Hoek residents cannot access our beach's coast in contravention of item 5 under Coastal Zone in Coastal Rivers and Waterbodies. Our residents and visitors must pay the entrance fee (no invoice slip or correct change provided) and informal car guards.	SDF/EMF	Site Specific	This is a 'management issue' and beyond the scope of this policy.
2	Our members living near our sportsfield will probably object to the development of flats anywhere near this field as suggested in item 6. Fish Hoek Sportsfield site.	SDF/EMF	Site Specific	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Succesful precedent exists for this in the city.
2	Proposed Fish Hoek Valley Zoning Overlay would like for our proposed overlay to be incorporated into the Municipal Planning By-Law.	SDF/EMF	Urban Development	Noted. This is more of an MPBL zoning scheme matter. However, this is in general opposed to as it will result in a proliferation of mini-zoning schemes across the city, which is what the city sought to remove (as so difficult to manage in relation to applications) with the integration of many historical zoning schmes into 1 about 20 years ago.
3	South portion of the Fish Hoek Sports field Field not underutilised. Renovate Clubhouse if want to make more money - would be aesthetically more pleasing.	SDF/EMF	New Dev. Areas	Agreed, and this is the intent, even if exact area is not specified, and no actual development yet proposed or applied for.

4	Object to Development of Fish Hoek sports field Object to proposed dev, lack of open space in area Current infrastructure strained - use funds to upgrade existing infrastructure Need for more open space and not more buildings.	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Successful precedent exists for this in the city.
5	1. Support the idea to remove the railway line from Fish Hoek to Simons Town, develop a beach front from Fish Hoek to Simonstown 2. The Fish Hoek CBD and especially the Main road is in need of an upgrade. Buildings are generally ugly and then many are not properly maintained.	SDF/EMF	Transport and Route Desgn.	Noted.
6	Object to dev Fish Hoek Sport Field 1. Object to proposed residential complex proposed for the Fish Hoek sports fields. Sport field provide area for sport and recreation for the community. Field not underutilised. Various sport clubs make use of the sport field. Propose new schools (high schools) for the area of Fish Hoek Need for infrastructure upgrades City only trying to maximize income - adding housing not the answer to use open land	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Successful precedent exists for this in the city.
7	CLOSURE OF RAILWAY LINE SOUTH OF FISH HOEK Before any lines are closed, details of proposed changes are required. - What will be the alternative transport connections. - What is intended with the statement "Connecting our beach front and CBD"? Which CBD? Fish Hoek or Cape Town central? - Which commercial node is referred to? - New plans need to be agreed and in place BEFORE lines are closed. Ideal scenario is to create NMT for pedestrians and bus service - not taxis.	SDF/EMF	Transport and Route Desgn.	Agreed in all respects. This is a policy statement speaking to a desirable future vision and medium to long term development outcome. All details and due processes would obviously still be required.
8	Closure of railway line south of Fish Hoek Question whether removal of public transport will enhance business opp in CBD? Decay of Fish Hoek CBD - improve business opp in CBD. Refer to Kalk Bay as an example - cut red tape. Main road becoming degraded.	SDF/EMF	Transport and Route Desgn.	Noted. This is a policy statement speaking to a desirable future vision and medium to long term development outcome. All details and due processes would obviously still be required.
9	CLOSURE OF RAILWAY LINE SOUTH OF FISH HOEK Object to proposed closure of railway line Support development / upgrading for Fish Hoek beach front and CBD. 1. This is an easy "cop-out" to properly maintain the line between Fish Hoek and Simon's Town - an absolutely beautiful train ride, I might add.. 2. The closure of the line will pave the way for the TAXI associations to operate more frequently into Simon's Town a. This will lead to creation of either an informal or formal TAXI Rank in Simon's Town - either of which I STRONGLY OBJECT TO! b. It brings with it an unruly criminal element including the infighting between the associations c. It brings with it, the litter aspect, double parking and blocking of roads, etc. 3. We already have the buses running to Simon's Town in addition to the railway. We do not need additional transport systems and most definitely not the TAXI's.	SDF/EMF	Transport and Route Desgn.	Noted. This remains at this stage just a proposal - which requires substantial on-going engagement and discussion (at multiple levels) before any consensus decision is reached. As such this matter is likely to take many years (if not decades) to resolve. However, a bus system (eg MyCiti) could provide an improved public transport service (ie. more frequent, more stops, transport all the way into Simon's Town, more flexible, almost as scenic - whilst also freeing up potential land for other recreational activities (eg promenade) and enabling (re-)connection of Fish Hoek town to the beachfront. Clearly unregulated and uncontrolled activities (such as taxis / MBTs) are not supported. So too littering, crime etc. But these are detail management issues which need addressing.

10	Development of Fish Hoek sports field Propose sport centre / cycle lab Propose upliftment of Fish Hoek area to attract investment. Support proposed closure of railway line of Fish Hoek.	SDF/EMF	Transport and Route Desgn.	Noted. Agree that all these have potential to stimulate urban renewal in Fish Hoek and result in improvement of area generally.
11	Fish Hoek Sport field Oppose proposed dev at sport field. Road infrastructure plagued with traffic Schools are already at capacity Sport field asset to community - unacceptable to develop it.	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Successful precedent exists for this in the city. See also other responses to this matter in comments responses below.
12	Objection to Development of Fish Hoek Sportsfields I object to the proposal of the development of the Fish Hoek Sportsfield. This area is used extensively for dog walkers, exercising and sports	SDF/EMF	New Dev. Areas	Noted. See, however, response to comment above and in many other responses to comments below.
13	Improvement of Sports Precinct Proposal Putting buildings in this area which gives the residents of Fish Hoek and its surrounds the wonderful privilege of being in the open when they are not inclined to take to the mountains or the beach for activity must be carefully considered. The occupants of the amazing amount of unsightly housing which has been crammed on to the area of the old kaolin mine above Kommetjie Road will need leisure space for their youth so I suggest skate board area would be of far more benefit for the community and very popular throughout the valley. The clacking noise of the skate boards would not aggravate residents nor is it in close proximity to any liquor stores. I do not think it suitable for offices housing or shops.	SDF/EMF	New Dev. Areas	Agreed, this must be carefully considered. Key to this is enhancement of the sports facilities through sustainable long term cross-subsidising. This won't occur without either of commercial, office or residential (& the former is not considered appropriate in this context).
14	Commercialisation of Fishoek and closure of rail line south of it. I object. It's just going to drive up the cost of everything and place the burden on an already overstretched people thanks to the Covid bungling (to name only the latest iteration thereof), of the economy even further.	SDF/EMF	Residential	This may drive up the cost of everything, unless associated alternatives are considered, such a smaller housing units - which are increasingly in demand for various reasons. The objective is a more enhanced, desirable and liveable area in which as broad a range of people can find a place to live, work or play.
15	Objects to more residential developments on the sports field at Fish Hoek 1. Please stop this over development of the Fish Hoek/Noordhoek valley. Apart from the environmental impact of such actions there are clearly issues regarding infrastructure that are not being addressed as quickly as development is being undertaken. 2. Schools are over subscribed, sanitation is under immense pressure but fresh water isn't, roads are a nightmare (answer appears to be more development, more roads)- both packed and falling apart, and public transport is now a joke. With big developments in the works for Kommetjie, and Masiphumelele growing at a seemingly exponential rate, plus other developments filling up, like the monstrosity that was allowed on Dassenburg, the issues are only going to get worse.	SDF/EMF	New Dev. Areas	Infrastructure constraints exist in all parts of the city to a greater or lesser extent. Comparatively this is not a big issue in Fish Hoek. Densification should apply to all parts of the city to a greater or lesser extent. However, Fish Hoek is not an identified growth area and as such should include small-scale densification in addition to urban infill in identified areas - which in Fish Hoek are few and far between.

	3. There needs to be a moratorium on new developments in the Southern areas and a more sensitive approach developed before future projects are allowed. And that is without even touching the seemingly negligent approach to nature- this is a wildlife sensitive area... unless there is some money to be made from development. Important natural habitats for increasingly endangered species are being put under threat. There is absolutely no reason for it. There must be a thousand places in Cape Town where former industrial land can be made into housing, or even turned back into viable business zones- and in most cases they will be more conveniently placed in central areas.	SDF/EMF	Facilities	This is an argument that could be made in all parts of the city, and arguably there are many (probably most) parts where this is far more realistic a call given local area realities. Fish Hoek area has for years had a very strong & consistent urban edge. The proposal for the sportsfield area is as a means to enable a better sports facilities precinct for Fish Hoek.
	4. I have very little faith in the process of raising objections to such developments, if there is money involved it will be built regardless, but maybe, just maybe those in authority will for once listen to the people they supposedly represent and not bow down to developers	SDF/EMF	General / Other	Noted. All objections are considered, but everyone has to be mindful of the fact that this is a continually (rapidly) growing city - which a) can't be stopped but rather which should be pro-actively and optimally directed, and b) growth if correctly done will enhance the liveability of the city.
16	Object to development of Fish Hoek Sport Ground Our BIGGEST challenge and problem for sports that are mainly height based (Rhythmic Gymnastics, Gymnastics, Aerial as examples) is that there is NO WHERE for us to train. I run a Rhythmic Gymnastics club and the height we require is 11m to be able to take our gymnasts to the level they need to be. We are currently crammed into small churches and are left behind at competitions due to not having the practice we need, due to our height problem. Another issue we find in the valley is the hall costs, if you do happen to find a slot available in the FHHS sports center you are paying R200 an hour and that increases monthly costs and reduces salaries. This is a big problem as most sport teachers are barely earning much as it is!!! My suggestion is: Build a sports center that is big enough to collaborate 2 - 3 clubs or studios at the same time. You can either divide the center into 2 - 3 equal portions and rent each portion out individually. This would then decrease the rate and will allow more sports the opportunity to train.	SDF/EMF	New Dev. Areas	Noted. The question is 'who builds such a centre'. This is unlikely in this context (at least for many decades) by the public sector (the City) - but is possible through the private sector - and in certain instances (eg. on public land) in partnership with the public sector (which then may ensure constrained usage fees etc).
17	Objection to proposed sport field development 1. congratulate the work done clearing the vleis which forms part of the Silverglade wetlands. We walk the fields daily and so enjoy the beautiful environment. The sports fields are well maintained and an asset to the Valley. We have resident jackal buzzards, coots and owls.	SDF/EMF		Noted.
	2. Building flats, shops and whatever your planners envisage is the thin edge of the wedge. What will be next? We do not need more shops, there is our ugly main road, Valsebosch and 2 shopping centres all in close proximity. Fish Hoek is not known for wonderful architecture – the mind boggles at what is planned to mar the sports fields	SDF/EMF	Urban Development	Noted. It is agreed that past development in Fish Hoek generally can be considered 'to leave much to be desired'. However, this need not be the case in future - & should not be a reason to therefore not support any future urban development. Rather, it is ensuring that any future development is positive and enhances the urban form & functioning of Fish Hoek. The proposal for development on the sportsfields precinct is not for development in of itself, but rather to introduce a mechanism to sustainably over the long term cross-subsidise an improved sports facilities precinct without compromising the current or future functioning of these facilities.
	3. Which brings me to property values - You cannot tell me that this development will enhance our property values?	SDF/EMF	General / Other	Why not? If appropriately undertaken there is clear precedent for this doing just that.
18	Objection to development of Sports field I am a new, first time home owner in Silverglades. The proposal to develop parts of the sports field is of great concern for me. This would have terrible ramifications for the homes and environment.	SDF/EMF	New Dev. Areas	Note responses to this concern elsewhere. Any such development proposal is for the primary aim of long term enhancement of the sports precinct - and certainly not to negatively impact it.

19	OBJECTION TO HOUSING/OFFICE DEVELOPMENT OF SPORTS FIELD IN FISH HOEK Rather than build flats or houses on a portion of the Fish Hoek sports field - develop the land to facilitate sports eg - build an athletic track or small stadium or even an outdoor gym like the one in Sea Point this would encourage children to partake in sports rather than do drugs or crime	SDF/EMF	New Dev. Areas	Noted. However, who pays though for these proposed enhancing additions? Please see responses elsewhere (above) to these concerns.
20	Fish Hoek Sports Fields Development - OBJECTION I would like to object to this happening. The last thing we need in Fish Hoek is LESS green spaces and sports facilities. The sports fields need to be left alone and the entire idea needs to be scrapped. The area cannot handle more and more people moving in from outside. This will put strain on an already loaded road system, electrical system, sewerage system, and much more. The sports fields need to be preserved as they are, FOR SPORTS. The more outdoor areas we have in the Deep South, the better for our environment and wellbeing.	SDF/EMF	New Dev. Areas	Noted. Please see responses elsewhere (above) to these concerns.
21	We are aware that there is no recreational entertainment space for teenagers to gather. Could there not be thought put into developing something and utilising the sports field grounds as I agree it is not get utilised well. My suggestions, with input from children and teenagers in the area, is something like stadium on main in Claremont- a bowling alley or roller-skating rink, movies, arcade, burger and milkshake bar with juke box and young up and coming teenage/young adult bands can play. A space where teenagers and young adults can gather, make friends and have fun. Even basketball courts/ skating ramps, bicycle park, something active for children to be outdoors and off screens	SDF/EMF	New Dev. Areas	Noted. These creative suggestions are welcomed. Any possible future development on the sportsfields site, however, will need to be very carefully considered. There are many necessary requirements (ie. that its purpose is to cross-subsidise improvement of the precinct). There are numerous uses, including sports / recreation uses, that would not be appropriate on this site dependent on scale, impacts on area character or on neighbours, and which could be equally or more appropriately accommodated on other sites (eg school sites or in the CBD or beachfront or another part of the Far South or city entirely)
22	Objection: Development of Fish Hoek Sportsfield	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.
23	I strongly object to the development of Fish Hoek Sports Field. The field is a safe space for me to take my toddler to play as we often find the wrong characters in the parks; and walking up a mountain is a no go. The area is already struggling to handle the current traffic, and schools can't accommodate the current students as is. Adding a development will make this even worse.	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above. There is no reason to believe that such proposal should or would impact negatively on the activities mentioned on this site. Indeed the objective should be (as a pre-condition) that any development on this site should enhance these activities re- a better space, associated attractions (eg coffee shop & garden).
24	Object to development of Fish Hoek Sport Ground I'd like to raise my objection at the planned 'small' development proposed. This valley is busting out its seams. I've lived here over 35 of my 40 odd years. We have NEVER had an increase in schools, yet, the development increases on every available open spot of land. Our road and water infrastructure can't cope with the people we have. The new residents will have children who will need to go to school. Where pray tell should these children go to school when the current residents children are being turned away? I would like to propose that a new government high school gets built instead.	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.

25	Objection to development of Fish Hoek Sportsfields I own a house in Briar Close, Silverglades and strongly object to any development of Fish Hoek sports grounds. Not only will it devalue our property, but it would ruin one of the best attractions to living in the area. The fields are certainly not under utilised. Living on one of the through ways that lead to the fields I can confirm that people are constantly walking to use the fields to either walk their dogs, to get some exercise in a safer open area as well by our multiple sports teams! The roads leading to the sports fields would be unable to cope with the extra traffic as well, never mind the ecological effect building so close to wetlands and nature areas would have. If this development goes through, we will probably put our house on the market and try and get out before property prices drop too low as living so close to the beautiful green space of the fields was such an attraction. What a pity!	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Succesful precedent exists for this in the city. See also responses elsewhere above.
26	Object to dev Fish Hoek Sport Field I object to partial use of the current Fish Hoek sportsfield for residential or office development. Currently it is a very enjoyable open space with beautiful views of water and mountains, enjoyed by sports people and walkers alike.	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.
27	I hereby object to the proposal of building residential properties on the existing sports fields. I use these fields daily and certainly have never found them to be underutilized. These are grounds that are always being used by the community at large, eg parkruns, soccer matches, cricket matches, squash games, all sorts of functions at the sports facilities, families out playing games with their children and people of all ages walking their dogs. This is one of the few remaining areas that older people feel safe to go walking on their own as there are usually people around to whom they can call out for help.	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.
28	I 100% wish to place my objection to this proposal. To put up 'flats' will be the death knell of Fish Hoek. If the town is full, the town is full! We need sports fields/green lungs – as it is there is nothing for kids to do in this town. Rather propose putting up a decent, well maintained and monitored skate-board park, or something that will be a safe place for kids/teens to do something healthy outdoors. Our roads /water/sewerage infrastructure cannot cope with anymore people accommodation! This will also contribute to the devaluing of properties in Fish Hoek!	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.
29	Objection - DEVELOPMENT OF FISH HOEK'S SPORTSFIELD I object the proposal to develop the Fish Hoek Sportsfield There should rather be plans to increase the usage of the sportsfield, such as providing more facilities for other sport codes and recreational facilities for families of Fish Hoek and surrounds	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.
30	OBJECTION TO BUILDING ON FISH HOEK SPORTS FIELDS As a homeowner at 174 Kommetjie Road, Fish Hoek, I wish to object to the above. In order to access my home if I'm driving northbound on Kommetjie Road, I have to make an (often unsafe) u-turn at the intersection of Kommetjie Rd and 20th Avenue, the one that goes down to the sports fields. That intersection is already over-subscribed, what with all the dog walkers, and one is literally 'sitting duck' in the right lane of Kommetjie road, waiting for a big enough gap to make the u-turn. There is no safe place to wait whilst crossing Kommetjie Road if there is already a car in the intersection. Keeping this in mind, there is NO way 20th avenue can handle any extra traffic, that intersection is already a nightmare and I wish to propose that the end of Nelson Road (near the Sun Valley robots) be opened to accommodate traffic as that would already ease the burden on that intersection.	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.

31	DEVELOPMENT OF FISH HOEK'S SPORTSFIELD I would love to support the idea of building a church or school at the sports fields, I think there is a great need for another quality high school in Fish Hoek, something like a Curro will add value to the town as a whole	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above. Such proposals should only be considered a possibility on this site if they meet the primary criteria for any development here - which is to provide sustainable short and long term cross subsidisation of the sports facilities re- their enhancement and use.
32	Development of Fish Hoek sports fields. OBJECTIONS. With reference to the above I have the following objections. Leopard Road breeding area. An endangered species and only found in W Cape . Walkers and dog walkers on those fields ALL day every day. Families gathering together at weekends. Flying Kites Model airplanes Cricket games. Various sports teams practising even after dark. Organised runs at weekends. One small access road which will not cope with traffic. Very little parking and the possibility of residence inconvenience. Open spaces are vital for this area and are used by very diverse people and activities.	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.
33	Fish hoek sports fields I would like to object to the proposed development of fish hoek sports fields these fields are always busy with cricket soccer and other sports it is so lovely to see how many young people enjoy them	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.
34	OBJECTION TO THE DEVELOPMENT OF FISH HOEK'S SPORTSFIELD As a concerned home owner and rate payer who resides in the area above these fields, I strongly object to the development of Fish Hoek Sportsfields which includes potential residential (flat development) or offices. This is an area utilized for sport and recreation, we do not have that many areas local to use recreationally.	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.
35	OBJECTION TO THE DEVELOPMENT OF FISH HOEK'S SPORTSFIELD Home owners objections. Regarding the possibility of a development in the Southern parts of the sports fields in Fishhoek. I as home owner of The below address object to having any development taking place on the Fishhoek sports fields and it's surrounds. Developing this area is cause for Natural high traffic concerns, safety for our children and their freedom to use this area as an environment to enjoy themselves with peace of mind and property prices being affected negatively. Let's also consider the pollution of the natural water capture area and the pollution disturbances thereof.	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.
36	Rail closure Fishhoek Simons Town I am in favour of the rail closure between Fish Hoek and Simon's Town if an alternative method (not taxi) is provided for example My City Bus's. We have lots of SANDF SA Navy personnel relying on train to get to work in Simons Town. Can My City Bus system also be expanded from Fish Hoek to Masipumlele	SDF/EMF	New Dev. Areas	Noted. And in general agreed. A bus system (eg MyCiti) could provide an improved public transport service (ie. more frequent, more stops, transport all the way into Simons Town, more flexible, almost as scenic - whilst also freeing up potential land for other recreational activities (eg promenade) and enabling (re-)connection of Fish Hoek town to the beachfront.
37	DEVELOPMENT OF FISH HOEK'S SPORTSFIELD We need to keep this as a recreational space. Fish Hoek is already overbuilt and the infrastructure can not cope with any further development!	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.

38	Proposed residential development on Fish Hoek sports fields. The FHVRRRA has brought to my attention the above matter and provided your email address for lodging objections. How can one make an informed decision without any information whatsoever? Would you please supply the detailed information relating to this proposal so that, as a resident directly affected by this, I may decide whether to protest or not. As there are less than 6 weeks remaining before the deadline, your urgent reply would be appreciated.	SDF/EMF	New Dev. Areas	Noted. This matter was answered in the public meeting held in Fish Hoek SC19 area. In short, there is absolutely no formal development proposal for this area - & hence no detailed info. The inclusion of this proposal in the draft District Plan is as a means to express a desirable & appropriate future possible development outcome which could assist (as it has elsewhere) with enabling an improved, enhanced sports facilities area. This is a real concern given increasingly constrained resources for the City to itself realise such improvements, and also meet changing recreation and sports needs and demands generally & also specifically in this area.
39	Fish Hoek Sports Fields I have heard that there is a proposal to build flats on the sports fields in Fish hoek? Could you please send me more information regarding this matter?	SDF/EMF	New Dev. Areas	Noted. See response to question above.
40	Objection to development of land - DEVELOPMENT OF FISH HOEK'S SPORTSFIELD Why does it have to be residential? Where are our open spaces for a recreational space for a beautiful park and walkways for our children and old people to walk and play. Where are the open spaces for people to walk through dogs and for new moms to push prams in this area? This area is overbuilt already - have they not noticed how much the increased traffic and the lack of schools in this area has impacted on this neighbourhood - what was the old 4 way stop is now a major intersection with speeding taxis. Or more importantly does the council already have some buddy that it already has made a deal with? - This is a more plausible question hence the want (not the need) to develop this land!!!!!! This area needs more open green recreational space that is not private but public that is properly developed for recreational use and healthy living not a block of flats!!	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.
41	Objection to development at Fish Hoek sports field It will increase crime in the area, and affect the natural environment for leopard toads, and other wild animals that live here.	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.
42	DEVELOPMENT OF FISH HOEK SPORTSFIELD NOT SUPPORTED I am totally opposed to the development of Fish Hoek sportsfield for the following reasons: • Development would leave the groundsmen unemployed. • There are no other facilities in Fish Hoek for sports such as cricket, soccer, running, baseball, rugby etc. • The club is a much needed community service. • It is a sanctuary for dog walkers and wildlife.	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.

43	Development of Fish Hoek Sports Field 1. The sports fields are one of the few places in Fish Hoek that are safe, free, flat and accessible to anyone. 2. It is proven that removing free, accessible and safe green spaces is a public health crisis. 3. It is proven that access to green spaces helps with mental health. 4. We don't need more offices. 5. What is 'under-utilized'? - How is a piece of land that is used every single day by multiple types of community members (young, old, rich, poorer, black, white) considered 'under-utilized'? Proposed what to do: 1. Build more outdoor gyms 2. Remove the alien gumtrees and put in indigenous trees to support birdlife 3. Enforce the speed limit on the dirt road that runs parallel to the river. Currently trucks and cars roar up and down with no consideration for runners or dog walkers. A fatal accident is more than likely. 4. Encourage more people to exercise here by erecting drinking fountains 5. Support the current clubs 6. Ensure litter is collected	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.
44	Development of Fish Hoek Sports Field Fish Hoek - problem with sanitation and water supply - upgrade rather than dev Roads congested - accidents, only 3 roads out of area. Need education facilities - waiting lists Residential dev last on list.	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.
45	DEVELOPMENT OF FISH HOEK SPORTSFIELD. No Residential development, but development absolutely. While we are sorely in need of housing solutions for our City's population, we, in the Deep South, are also in need of leading sports facilities, offices and high schools there is only 1 site in this area, in my opinion, that can satisfy the sporting recreational needs of ENTIRE Deep South population from a proximity point of view. Zone the area for Business and build an office park. Use revenue from that development to upgrade and build world class sports facilities including an Aquatic centre. Sell off one piece of the property to a private school to build a high school.	SDF/EMF	New Dev. Areas	Noted, and in-principle agreed with entirely.
	In addition to my previous email about the Fish Hoek Sportsfields I would like to comment on the following proposal for: Fish Hoek town site: erven 7000-rem et al. To my knowledge this is the public space and park next to Bay Primary and Fish Hoek primary schools. I would like to propose developing an Aquatic Centre on this land if there is no aquatic centre development going ahead on the sportsfields. I object to this becoming residential infill and propose that it is further developed for community use. The centre will be done according to the FINA Pools For All Project which utilises a sustainable development plan for public swimming pools that make these centres run at break-even, or even a profit.	SDF/EMF	New Dev. Areas	Noted. This is detail beyond the scope of this policy. The policy makes a broad recommendation. If a later well-motivated proposal / application is submitted then this will be considered on its merits.
46	Objection - proposed dev of Fish Hoek Sportsfield 1. Negative Impact on Peers Hill conservation area 2. Negative impact of Population increase in an area: 3. Negative impact on the value of existing residential properties 4. Erosion of the unique character and quality of living of Fish Hoek	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.

47	live in Silverglade in Fish Hoek and my Ratepayers Association has informed the residents that there is a proposal to develop the sports field and build flats. I believe that there should be a time-frame for residents, who would be affected by this, to comment. However, nothing has been put out to residents as yet. Please could you forward me the details of this plan, as well as the process for public comment	SDF/EMF	New Dev. Areas	Noted. This matter was answered in the public meeting held in Fish Hoek SC19 area. In short, there is absolutely no formal development proposal for this area - & hence no detailed info. The inclusion of this proposal in the draft District Plan is as a means to express a desirable & appropriate future possible development outcome which could assist (as it has elsewhere) with enabling an improved, enhanced sports facilities area. This is a real concern given increasingly constrained resources for the City to itself realise such improvements, and also meet changing recreation and sports needs and demands generally & also specifically in this area.
48	I'm a resident of Fish Hoek, and have an elderly mother living in Silverglades right on the sports fields that you are wanting to develop. You say that the sports fields are underutilised. I would like to know how you have arrived at this conclusion? Has there been a study done? Does someone assess the level of activity and what are you using as comparison to base this outcome on? I would like to know this. As I live here, I can tell you that it is not underutilised. People come from all over to practice soccer and cricket among other sports. Where will the men practice who come from Masiphumele if you build flats? There are many frail elderly people who cannot walk in the mountains or the sandy beaches. They use the sports fields to exercise. What about the hundreds of dog walkers? We need our green spaces. It is also a breeding area for the endangered Leopard Toad. What would you do to safeguard them? Instead of knocking up more flats, why don't you repair the parking area, and get the fields back to a better state, fix the cricket batting cages, fix the cricket pitch get the waterworks people to stop speeding in their trucks through the neighborhood and making a noise all day and all night. <u>Then more people will "utilise" the fields for sports. Which is the purpose it is meant for. Not neglecting it for</u>	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above. Related to this is changing needs and demands re- sports (& recreational) activities and facilities which need to be responded to (new activities eg hockey pitches - or increased usage eg. soccer use on turf)- & in an environment of increasingly constrained resources (funding etc)..
49	I would like to enquire regarding the Developement at Fish Hoek Sports Field. I would like to enquire about potentially having a Gym there? I coach Cheerleading and Tumbling. We are registered with SAMCA who ha registered with Sasscoc	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above. Such proposals should only be considered a possibility on this site if they meet the primary criteria for any development here - which is to provide sustainable short and long term cross subsidiation of the sports facilities re- their enhancement and use.
50	Previous Mayor Patricia deLille, back in her day, identified the Fish Hoek Sports field to be an area for low cost housing. About 4 years ago, it was posted near the field one wet blustery winter, a sign (which blew away) with the intention to expand the depot land, and this area was named along with a developer. The developer was some organisation the develops low cost housing. There were a number of objections made, a meeting had and it was ruled that this plan to annex this land for depot use was given permission. Even the residents adjacent to the sports field were blissfully unaware of this. One thing you must know people there is corruption abound within the City Council and anything objected to, is squashed, unless there is a major public outcry. My personal feeling is all open land should be kept open, for future generations, for sports and recreation. Currently there is soccer played on the field closer to Kommetjie Road and I can tell you the shouting that goes on between players is so loud and a disturbance of note, especially on a Sunday afternoon. There is another whole lot of vacant land opposite the robots at the junction of Corsair and Kommetjie roads. Why not build something there? This field sited is opposite The Glade Green Belt, and residents of the Glade, in Silverglade. The field/area they say is underutilised. Absolutely bare minimum maintenance has been over the years, the grass in summer seldom cut, promoting the weed Pattersons Curse. The previous groundfill rubbish dump that it once was is breaking down now and creating swales	SDF/EMF	Environment	Noted. See responses elsewhere above. Such proposals should only be considered a possibility on this site if they meet the primary criteria for any development here - which is to provide sustainable short and long term cross subsidiation of the sports facilities re- their enhancement and use. As such low income residential development on a part of this site would not meet this criteria and would be viewed as a negative impact on the sports facilities area therefore. The alternative adjacent site referred to is in part a high biodiversity area and in part a proposed future roadway.

51	Please refer to attachment for detailed comment 1. Inclusionary Housing Concerning that there is a degree of looseness in the way that the topic is dealt with in the DSDFs. Much of this looseness can be attributed to the fact that the City's Inclusionary Housing Policy has not yet been approved. 2. HPOZ HPOZs are especially prevalent in the Table Bay and Southern DSDFs, with most being located along the Main Road corridors (as identified in the Draft MSDF). Two Concerns wrt HPOZ: A: The Main Road corridors, along which many of the proposed HPOZs are located, are meant to be areas of the City that are targeted for investment (public and private) and noteworthy land use intensification as per the guidelines contained in the MSDF. Therefore, promoting large blanket areas along these corridors for "heritage protection" seems to be contradictory to meaningful land use intensification (and associated investment), especially considering that private developers have generally begun to steer clear of land or buildings with heritage connotations B. Any statutory approval process (MPBL or otherwise) that involves matters of heritage carries a larger degree of risk/ uncertainty and invariably takes longer to be concluded than if heritage is not involved.	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above to point 1. Re- point 2, noted - this is indeed a challenging context (of promoting development intensification in certain targetted areas which are also heritage areas) but this is quite possible (eg in city bowl area).
	We therefore request that these areas be removed from the various DSDFs. If the heritage of these areas is truly valuable and worth protecting, then the City (or others) should take steps to formally declare these areas as HPOZs in terms of the MPBL	SDF/EMF	New Dev. Areas	Noted, and this is being considered. The reality is that red tape needs generally to be removed to streamline the development process - & esp in areas where this is targetted for growth. However, this requires very careful consideration - as equally there is important heritage which should be retained. However, this is generally not 'an either or but a both'.
	3. Proposed supporting development guidelines that constitute development regulations.	SDF/EMF		noted
52	Fish Hoek Sport Field Oppose proposed dev at sport field. Road infrastructure plagued with traffic Schools are already at capacity Sport field asset to community - unacceptable to develop it.	SDF/EMF		Noted. See responses elsewhere above.
53	Fish Hoek Sport Field Oppose proposed dev at sport field. Road infrastructure plagued with traffic Field not underutilised Need additional Schools Dev proposal Flawed - way to generate income for City	SDF/EMF		Noted. See responses elsewhere above.
54	CLOSURE OF RAILWAY LINE SOUTH OF FISH HOEK Oppose closure - traffic, improve railway, tourist attraction The sewage and main water systems need a serious upgrade, the roads need an upgrade. In fact the general infrastructure of the area needs a serious overhaul.	SDF/EMF		Noted. See responses elsewhere above - esp comments 16 and 23.
55	Object to dev Fish Hoek Sport Field Objects to more residential developments on the sports field at Fish Hoek pointless development of green sites Need additional schools - help to maintain sport facilities.	SDF/EMF		Noted. See responses elsewhere above.

56	CONSTRUCTIVE COMMENTS ON THE MSDP PRESENTATION HELD IN ALPHEN HALL, CONSTANTIA ON 3 AUGUST 2022 1. Slides not suitable for projection - too many words. Have less cluttered slides. 2. Failure to identify aspects of slides. 3. Presenters failed to convey message to audience 4. Structure of meeting was faulty, should have been termed information meeting rather than public participation meeting. 5. Question period should have been longer 6. Public is not PC literate - reports need index for easy reference. 7. have hard copies at venue week in advance.	SDF/EMF	General / Other	Noted. Mostly all points well-made, acknowledged, and identified as a clear weakness and a matter requiring serious attention in future (eg training or other specialist service providers).An impossibility these days to provide all I&APs with hard copies.
57	Densification in the Southern District City needs to do more to get the message out to the public Diep River is a development by Seef called TUTILI Place, whereby they intend to flatten 6 old occupied railway houses and build 71 flats (studio and 1 bedroomed flats) on this piece of property. The first time we knew about this was when the sign boards went up and nobody in that vicinity had a clue as to what was happening. Where was the public participation? Was a traffic investigation done? Will the electricity, water and sewerage infrastructure be capable of carrying the load?	SDF/EMF	Urban Development	All actual proposed developments (in the form of formal applications) always have to follow all legally required processes. Any development proposed for this site would not be an exception. The specific details relating to this are, however, outside of the scope of this policy document.
	I understand that densification along the main routes is important to reduce urban spread, but at least let the surrounding home owners know in advance what is planned by allowing proper public participation. This can be done by attaching a letter to the rates accounts in the districts so that owners are aware that their properties may be affected by what is being planned. By getting the ward councillor to communicate with the different ratepayers associations in the district	SDF/EMF		Noted. However, this is a matter beyond the scope of this policy report.
	Failed densification in Wynberg, Grand Central, a block of flats has become a real problem as it has attracted the wrong type of tenant with overcrowding which leads to other nefarious activities. I understand that this is a management problem but it eventually becomes the problem of law enforcement when things get out of hand. This can easily happen if densification is wrongly approached.	SDF/EMF	Residential	Noted. This, however, cannot be reason to stop all densification. It does point though to the need for esp care and focus for such development in areas such as Wynberg where this problem has arisen.
58	Development of Fish Hoek Sportsfield - E&J Chapman - Silverglades lodge our objections to the procedure that has been adopted to seemingly rail-road development plans and over-ride any informed input from the very people most affected – i.e. the local landowners. The lack of discussion and transparency is suspicious to say the least. Any development of the area has enormous financial and lifestyle implications for us all and we deserve to be respected and informed.	SDF/EMF	New Dev. Areas	Noted. This matter was answered in the public meeting held in Fish Hoek SC19 area. In short, there is absolutely no formal development proposal for this area - & hence no detailed info. The inclusion of this proposal in the draft District Plan is as a means to express a desirable & appropriate future possible development outcome which could assist (as it has elsewhere) with enabling an improved, enhanced sports facilities area. This is a real concern given increasingly constrained resources for the City to itself realise such improvements, and also meet changing recreation and sports needs and demands generally & also specifically in this area.
59	Utilisation of Fish Hoek Sports Field I raise my objection based on the following simple fact: • There are no longer any sports ground facilities at all, in Masiphumelele. • Retain the status quo and designation and ensure that priority is given to the youth of today and tomorrow who have no access to such facilities in Masi. They certainly deserve it.	SDF/EMF		Noted. See responses elsewhere above.
60	Fish Hoek Sport Field Object to any future dev - maintain current purpose - a beautiful, safe greenbelt for exercise, recreation and sports activities, and exclusion of motor traffic One of the few close, green areas we still have access to and is essential for safe walking, relaxation and sporting enjoyment of our community	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.

61	Fish Hoek Sport Field Object to low cost housing bring built on a portion of the Fish Hoek sports field for many reasons that will not be beneficial to the residents in Silverglade especially.	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above. Such proposals should only be considered a possibility on this site if they meet the primary criteria for any development here - which is to provide sustainable short and long term cross subsidisation of the sports facilities re- their enhancement and use. As such low income residential development on a part of this site would not meet this criteria and would be viewed as a negative impact on the sports facilities area therefore. The alternative adjacent site referred to is in part a high biodiversity area and in part a proposed future roadway.
62	Wynberg Densification like the idea of a mini "Central Park" type of development around Maynardville Park physical upgrading and densification of Wynberg needs to be accompanied with upliftment opportunities for the people. Providing affordable training and jobs in the area would be key to uplift the people. Perhaps Wynberg can focus on more creative and soul nourishing pursuits for its people and get a reputation as a creative hub? Attracting the greater Cape Town area to enjoy the local creativity? We have the maynardville open air theatre already. We have the restaurants and decor houses in Wolfe st. Cooking schools? Ceramics factories? Music Schools? Choirs? Dance schools? Media schools? Hair and clothing? Garden design?	SDF/EMF	Urban Development	Constructive comments welcomed & noted. Of course this draft policy provides only broad development guidance and cannot include very detailed information or proposals, and can influence but not enforce certain development outcomes and activities - esp re- privately owned properties.
63	Fish Hoek Sports Field My objections are: 1) I fear for my safety 2) due to the nature of the foundations of the houses, which is essentially sand, as they are built on sand dunes, any major excavations such as those you intend doing, will impact negatively and majorly on the structure of both mine and other houses, which will lead to structural damage caused by subsidence and landslip. Should you proceed with the intended development, please be advised that you will be held liable for any structural damage that may be caused to my property.	SDF/EMF	New Dev. Areas	Noted. Any actual proposed development, should it materialise on any part of this site, would need to follow all due (legally required) processes - which would ensure your concern among others is addressed / obviated. See also responses elsewhere above.
64	Request that the City recognise this existing historic node at Alphen, and other similar nodes, by way of an appropriate annotation, on the Southern District SDF and Sub-district plan. Previous District Plans use the annotation "destination place".	SDF/EMF	Environment	The challenge here is consistency across all areas in the District plan (& indeed all the District Plans collectively) re- identification & designation in the policy as 'destination place'. So, what qualifies this area over other (potentially many) contexts which are in many/most cases are of higher merit? See also response to 3 below re- instead a potential general 'gateways' policy guideline.
	The Draft 2 (May 2022) Southern District Spatial Development Framework and Figure 16: Subdistrict 2: Bishopscourt – Constantia – Tokai both indicate Erf 429, 430 and 438 Constantia as 'Structuring Open Spaces'. This spatial planning category is incorrect. All three erven are zoned Single Residential Zoning 1 (SR1). Request that this error - pointed out before - be addressed.	SDF/EMF	Environment	Apologies in order here. There has been a lengthy technical challenge bedding down an appropriate 'green' layer re- essentially - updating the 2012 green / open space layer vs introducing a GIN (Green Infrastructure Network) layer as being developed by our Env Management dept colleagues. The 3 properties of concern here are just 1 of many cases. A process of amendments to sort this out has now occurred to reflect correctly.
	Request that a 'guidance statement' be included within Table 14 of the Draft 2 Southern District SDF, and that this statement may read as follows: 'The Alphen Estate and Silo Precinct is recognised as an important component of a revitalised mixed-use community node and gateway to the Alphen Drive part of the Constantia Valley.'	SDF/EMF	Site Specific	Since advertising a draft additional guidance statement for Constantia-Tokai sub-district has been included. However the detail level of this Alphen comment - & specifically the proposed amendment – steps into the over-specific & can't be justified re- consistency (& without the plan content over-extending).

65	Pages 94, 95 and 96 Supporting Development Guidelines (how and where?) Point 2 is welcomed and we fully support the concept of the area becoming "a leading green economy area". Point 4 Kommetjie Road "... identified mixed- use nodes ... " "... appropriate landscaping along the route...." We agree that carefully considered landscaping along this route and particularly at these nodes is important. Point 5 - strongly disagree with this concept. On the one hand, "minor additional densification" is advocated and then up to 4 storeys is suggested – a contradiction. We do not support any buildings along the Kommetjie Road to be higher than 2 storeys and strongly object to any buildings along the Kommetjie Road being 4 storeys.	SDF/EMF	Residential	Noted. Re- pt 5 - the DMS (zoning scheme) currently permits building as of right to 11m (to 'wall plate') - which effectively permits as of right 3 storeys. Nonetheless, internal discussions have now resolved that ref to specific no. of storeys is potentially confusing (& problematic) when the DMS does not refer now to storeys at all (but rather heights). Development guidelines therefore are to be revised accordingly. The emphasis here remains on supporting 'minor densification'.
	Point 12 "Waste Disposal" - should be a focus in the planning stages of developments especially in high density areas. Focus should be on waste storage and removal as well as recycling Point 15 "... planning and design should be considered in areas that overlap with faunal territories ... " This is essential in areas with high baboon visitations like Sunnysdale. Point 17 "Scenic Route upgrading" – areas such as Masiphumelele would greatly benefit economically from being on the Scenic Route	SDF/EMF	Utility Infrastructure	Waste disposal planning is based in part on land use proposals in the Pt 1: MSDF and District Plan as they affect different areas of the city into the future. In part also based on population projections, land use modelling etc. Pt 2: Baboon issues etc are now explicitly included into broad development guidelines in the draft Southern District Plan.
	Pages 98. q. Sun Valley, Sunnysdale, Capri, Masiphumelele specific a) Areas "Sun Valley, Sunnysdale, Capri and Masiphumelele specific" in the LH column are inaccurate. Sun Valley is the residential area east of Ou Kaapse Weg so should be removed. Capri is a residential area within the suburb of Sunnysdale - including it here is unnecessary. Masiphumelele lies within Sunnysdale. b) "The full integration of Masiphumelele into the valley as an orderly suburb is required" To this point we add integration is enhanced with UPLIFTMENT.	SDF/EMF	Urban Development	Noted, and amended accordingly.
	c) "See Masiphumelele Draft policy ... guidelines for the area". Not as the March 2021 Draft Masiphumelele LSDF stands. There was Public Participation around this document and extensive and constructive comments were submitted and errors or outdated information in the Masiphumelele LSDF Draft document were highlighted. Has the draft been updated with the input from the public?	SDF/EMF	Site Specific	This draft SDF has been updated, and is now awaiting submission into Council committees for approval.
	d) Points for inclusion in Point 10 of the current document: i. Only low to medium density south of Kommetjie Road, ii. Safety and social services on the Solale property are supported, necessary and desired, iii. No more than 2 stories or a height equal to that of the Kommetjie Road Fire Station building, iv. Incremental growth and consolidation, v. Formal housing only and vi. Aim towards upgrading/uplifting Masiphumelele	SDF/EMF	Urban Development	Noted, and amended
	Point 11 a) ".... Providing for the growing public facility and service needs of the growing Masiphumelele community...." The use of the word "growing" is of concern – rather use "existing" as this area is marked for "incremental growth" only	SDF/EMF	Site Specific	Noted, and amended
	Page 98, 99. r. Noordhoek Silvermine specific • Point 14 We support affordable housing on an infill site between the existing sports fields. This could take some pressure off Masiphumelele and the immediate surrounds. However, we believe that the sporting facilities should remain, if not expanded.	SDF/EMF	Site Specific	Noted. This is essentially what is proposed in the draft District Plan.
	Page 100. 3. Masiphumelele Erf 5131 • This site is well suited and positioned to accommodate residents of Masiphumelele. The erection of a hard barrier of sorts, which prevents encroachment of the urban edge will be essential to protect the natural environment. Phase 2 of Houmoed Avenue could well provide such protection.	SDF/EMF	Transport and Route Design.	Noted. The importance of a 'hard barrier' such as a road is supported in all commenting and inputs by this dept.

Pages 100 and 101. Points 4 and 5 Capri: Erven CA953-13, CA953-12, CA953-31, CA953-30 etc. These erven numbers need updating to 17791, 17792, 17787, 4105 rem, 953-RE. etc. (These current/updated erven numbers were supplied to us by Kier Hennessy in August 2022) • "Capri" in the heading of point 4 and 5 is misleading for the following reasons: a. Only erven 17787 and 177789 (Old Tabunkulu site) are in the residential area of Capri, Sunnysdale. b. 17790 and 17791 are on Old Kommetjie Road in the residential area of Wingate Heights, but technically can still be classed as Capri, Sunnysdale. c. 4105 RE is in Faerie Knowe, Sunnysdale (no access to Kommetjie Road and not Capri). d. 953-38 RE is on the east of Glencairn Express Way and falls within the suburb of Fish Hoek.	SDF/EMF	Site Specific	Noted, and amended
Point 5. "A wider range of housing options should be encouraged Particularly adjacent to Kommetjie Road". The greater part of the land west from the fourway road intersection on Kommetjie Road is already developed as, or has approved plans (currently building) for, low density single residential. The remaining land on the south is owned by Living Hope (Mixed Use). Land on the north of Kommetjie Road is mostly zoned as commercial or light industrial or is developed as single residential. Many of the erven listed here are bounded within existing residential properties. Therefore, as we see it, currently, there are little to no opportunities for the recommended housing opportunities along the Kommetjie Road.	SDF/EMF	Urban Development	Noted, and amended
Pages 101 and 102, Point 8, "Solole et al Kommetjie Road: Comprising Erven 17775 (Solole), 17777, and 17776 a) The Spelling of Solole was amended in most places but the error still exists – first word next to point 8 (Solele) b) Erven numbers have been updated to the current numbers. Thank you. c) Information around properties 17777 and 17776 is now accurate including heritage status, fire and stormwater restraints as well as ownership status. Point 1. Solole site erf 17775 – "... potential area for public facility – strategic location...". This should be the priority on this erf as Law Enforcement and social and safety services are greatly needed in the area and will form the vision of the social services corridor between Living Hope and Wood Road. Please make note that the Safe House (Kathy Cronje) is currently on the land and has plans to expand these much-needed services. Point 2. We support "GAP housing" on this property with medium to low density only and a height restriction of 2 storeys. Point 3. "... The two larger erven are privately owned and might seek alternative development outcomes..." . This is accurate with Living Hope (erf 17776) focusing on health and agriculture. The Old Homestead (erf 17777) will in the medium to long term be focusing on cultural activities with social impact outcomes as well as some agriculture.	SDF/EMF	Site Specific	Noted and amended where relevant
Maps 2. Southern DSD Sub-District 4 Map "The Far South" (February 2022) General: These important maps - Sub district 4 Map - Figure 18 (page 93) and the Sub-District 4 Map "The Far South" February 2022 both need to be updated to accurately reflect the status of property 17775.	SDF/EMF	General / Other	Noted, and amended

- On the maps the dark orange colour (High Density Residential Development) of Erf 17775 (Solole) is inaccurate and thwarts potential options or desired outcomes. - Erf 17775 is well positioned for further much needed safety and security facilities in the area. To back this up, Volume 2, page 101, Point 8 "Future Use" states ".....Mixed Use development". In addition, point 1 states that this property is: ".... a potential area for further required public facility provision in a strategic location". The property (erf 17775) should therefore be categorised on the maps as "Mixed Use" (coloured the darker blue) to align with the information presented in Point 8. - To support this "Mixed Use", there is an existing Safe House on the property (they have plans for expansion) and the Kommetjie Road Fire Station is already in situ next door. - In addition to this, colouring it the darker orange, to represent Higher Density Residential Development only, is inaccurate, as in Volume 2, page 102, Point 8 it states: "..... In general, higher density residential would be appropriate adjacent or close to Kommetjie Road with lower densities further away....". - We are pleased to note that Living Hope (erf 17776) has been coloured darker blue (Mixed Use), as this is a true representation of the current and future use. We would like to see erf 17775 follow suit in future updated SDSDF maps and documents.	SDF/EMF	Mixed Use	Noted. However, the map designation has to be read in conjunction with (the arguably more important) associated development guidelines text. The darker blue 'mixed use intensification' is to be amended as this is potentially misleading (re- possible future commercial use) - and is to reflect only a part of the site as residential infill - with guidance for the broader site for accommodation of social facilities (only).
2. Volume 3 IDSDF & EMF Implementation Plan May 2022 1.2.1.a) New Road Links x. Triggs Road to Kommetjie Extension We request that the proposed Triggs Road/ Abbington Road extension be looked at carefully. There are safety concerns (2 inclines/declines) on this proposed route. Please see Annexure A attached. There are possibly safer options to relieve potential congestion.	Implementation Plan	Transport and Route Desgn.	Noted. This is however detail beyond the scope of this policy report and for the attention of the Transport (Urban Mobility) dept.
1.2.1.b Road Upgrades ii. Ou Kaapse Weg between Sun Valley and Tokai "... this is considered to be a project of rather less importance for implementation in the medium to longer term". With ever increasing demands on this mountain pass (Ou Kaapse Weg) we motivate that this upgrade is changed to read short to medium term.	Implementation Plan	Transport and Route Desgn.	Noted. This however is Mobility Dept matter ito their prioritisation of future projects - and has to take into account huge demands across the city.
3. Hierarchy of Nodes - We note that Masiphumelele is listed as one of the "Top Areas Of Need" requiring: 2 sports fields, 1 secondary school, 1 primary school, 1 community park and a new/replacement clinic for Masiphumelele. These facilities should be prioritised ahead of housing (for an additional influx of residents) as these facilities will contribute to the well-being and upliftment of the community with education being primary. With education and upliftment, should come a better understanding and concern for the environmental issues. - Page 29 The following extract further emphasises the above: ".....The need for education facilities in Masiphumelele and Hout Bay is critical " and ".....The district also has a high need for health facilities particularly in the Retreat/Tokai, Masiphumelele and Hout Bay".	SDF/EMF	Urban Development	Noted. However, this is a policy report encouraging future action outcomes. The detail re- actual action rests with relevant dept's & their priorities and resources.
Table 8: Sub-district Prioritisation per DSDF Priority Local Area (page 42) - Please note the Masiphumelele Housing project Phase 4 is already in hand with about 276 units completed, handed over and occupied. - Please note the Masiphumelele taxi rank is completed and in use	SDF/EMF	Residential	Noted

	Table 10. Policies withdrawn (page 48) Sunnydale Local Area Structure Plan • Motivation as per table 10: "These are now very dated policy, and many proposals are either no longer relevant or no longer appropriate. Any key guidance from these policies which is still considered relevant was included in the 2012 Southern District Plan and/or is included in the reviewed 2021 draft Southern SDF." We have no objection in principle. However, Sunnydale does not wish to lose its identification nor its geographical demarcations on the maps in City documents. Annexure C shows clearly the boundaries of Sunnydale. On City maps and documents and Masiphumelele postal addresses properties in Masiphumelele are listed as being situated in the suburb of Sunnydale.	SDF/EMF	General / Other	Noted.
	6.3 Sanitation page 76 and 77 • "...The Far South is lacking in capacity in some areas...". We note that there are plans (Sub-council 19's budget 2022) to upgrade the Wildevool Vlei Water Treatment plant in the short to medium term. This SDF data highlights the need for this upgrade. 7 Figures 37,38,44,47, etc (Page 81 onwards) • We note that the suburb of Sunnydale in these maps is not marked. It has been incorrectly replaced with "Masiphumelele". However, we note that all other suburbs are still named e.g., Fish Hoek, Kommetjie etc and that Hout Bay is still marked as such, and has not been replaced on maps as Imizamo Yetho. • We note that the spelling of Masiphumelele is incorrect on all these diagrams – Masiphumelele and not Masiphumele • Annexure B is an example	SDF/EMF	Utility Infrastructure	Noted, and will be updated where necessary.
66	Fishhoek Sports Fields Development I strongly object to any development of our sportsfields. Use the sportsfields often, concerned about information given and what are planned for the land. I feel we need to know exactly what is being proposed for this land before any decisions are made as it will have an effect on Silverglades.	SDF/EMF	New Dev. Areas	Noted. Any actual proposed development, should it materialise on any part of this site, would need to follow all due (legally required) processes - which would ensure your concern among others is addressed / obviated. See also responses elsewhere above.
67	First of all, I would like to say that I heard of this only today, 19/8/22 and the deadline for comments is 30/8/22. I have NOT seen adverts in local papers, nor has there been anything said on the monthly rates bill, which would have been an ideal method of communicating with affected residents. We listen to FMR daily, not a word. We read daily business day, not a word. The city has our e-mail address, not a piep.	SDF/EMF	General / Other	This is a policy statement speaking to a desirable future vision and medium to long term development outcome. All details and due processes would obviously still be required.
	What strikes me the most, is that you go about densification in area which are far away from Industry, respectively where future industrial development could take place. Take Hout Bay. The only jobs going here are gardeners, domestics some in retail and the harbour. The rest must travel far to earn a living, thus contributing to chaos on the road. Our sewerage system is overloaded, water supply is creaking and leaking, electricity is bursting at its seams. On the whole Hout Bay is degenerating into a slum. This can probably also said about all areas you have earmarked for densification.	SDF/EMF	Urban Development	Infrastructure constraints exist in all parts of the city to a greater or lesser extent. Comparatively this is not a big issue in Fish Hoek. Densification should apply to all parts of the city to a greater or lesser extent. However, Hout Bay is not an identified growth area and as such should include small-scale densification in addition to urban infill in identified areas - which in Hout Bay is limited only to Imizamo Yethu. Hout Bay may be quite peripheral and not have many jobs in comparison with some areas, but in comparison with many areas it is a place of opportunity.
	The answer is to build satellite cities around Cape Town. Travel to China and see how it is done. What you have in mind is choking the City and destroying what makes Cape Town attractive to live in. Renewal yes, improving yes, but not what you have in mind. Again, build satellite cities, it cheaper in the long run.	SDF/EMF	General / Other	I am sorry to hear you had not seen any of our newspaper adverts, we advertised in the papers below and on these dates. Notifications were also channelled through sub council and on the City's website. We had media release and also advertised on the City's social network pages. We are required by law to advertise for 60 days but we have gone longer than that. The plans have been available for public comment from 4 June to 30 August 2022.

68	1. Volume 2, 4.4, Page 101 and 102, POINT 8. ERF 17775, ERF 17777 and ERF 17776 ERVEN: 17776 and 17777 Point 8: Erf 17776 and Erf 17777 have been accurately updated to include private ownership, heritage status and fire and stormwater restraints, as well as acknowledging that owners may seek alternative development outcomes. In addition, information is accurately reflected on maps in Volume 2, 4.4, page 93, FIGURE 18 (August 2021) and in the map of the Southern District Sub-District 4 "The Far South" (February 2022) - (Erf 17776 has been updated to Potential Mixed Use).	SDF/EMF	Site Specific	Noted.
	ERF:17775 Point 8: The "Spatial Development Objectives (what and why) in terms of the SDF" as well as the "Supporting Land Use guidelines (How and Where)" accurately reflect the options and potential of erf 17775. "Future Use: Mixed Use development inclusive of residential infill and public facilities ". Also stating that the site is "... strategically positioned for a Public Facility and residential component". This information in Point 8, has been updated since the 2021 Public Participation, and also since the Masiphumelele LSDF March 2021 (draft). However, the supporting maps i.e., Volume 2, 4.4, page 93, FIGURE 18 (August 2021) and in the map of the Southern District Sub-District 4 "The Far South" (February 2022), have not been updated to reflect this information. This has resulted in an incongruency between the written description and the colour coding on the maps. These need to be brought into alignment in order to accurately reflect the potential and desires of this property – i.e., Potential Mixed Use. Colour coding it dark orange for Potential High-Density Residential Development only, is inaccurate and misleading.	SDF/EMF	Urban Development	Map designations and accompanying text for key (urban infill / NDA) erven in this area are revised to better reflect future development desirability and intent. This relates most specifically to erf 17775 - where designation as mixed use intensification may be misinterpreted by (a possible future) landowner as supporting commercial activity when this is expressly not considered appropriate to be supported. The revised text makes clear that identified NDA sites south of Kommetjie Road may in future, from a District Plan policy perspective, be supported for either residential or social / public facilities or (preferably a mix of) both.
	Action needed: The map in Volume 2, 4.4, page 93, FIGURE 18 (August 2021) and the map of the Southern District Sub-District 4 "The Far South"(February 2022) need amending to reflect "Potential Mixed Use" (colour coded dark blue) on ERF: 17775 to align with the accurately updated information in point 8.	SDF/EMF	Urban Development	Please see response above.
69	Sunnydale Ratepayers association As a member of the Sunnydale Ratepayers Association, I fully support their submission of 22 August 2022 to the City of Cape Town Spatial Planning and Environment Department	SDF/EMF	General / Other	Noted.
70	COMMENT: DRAFT MSDF AND DRAFT SOUTHERN DSDF & EMF: ERVEN 701 & 551, CHAPMANS PEAK (NOORDHOEK) Our client objects to the designation of portions of the property by the Draft MSDF as "Critical Natural Asset", i.e. "Critical Biodiversity Area (Core 1: CBA 1a to CBA 2)" and by the Draft Southern DSDF & EMF as "Core Biodiversity", i.e. "Core 1: Protected and Conserved Area" and/or "Core 1: Critical Biodiversity Area (CBA 1a to CBA 2)" as the property has a number of existing land use management approvals, including that of an internal subdivision for a residential estate.	SDF/EMF	Site Specific	Agreed. An issue which should already have been sorted out - but unfortunately caught up in mixed inputs, interpretations and data layers concerning 'natural environment'. This has now been corrected.

71	Taking the property's location within the urban edge, the biophysical characteristics of the property, the existing land use management approvals for the property (e.g. amendment of the Urban Structure Plan to urban development, rezoning and subdivision) and the progress made in complying with conditions of approval (inter alia approval of property diagrams by the Surveyor General, provision of services, the integrated building in the Mixed-Use zone being completed and occupied and building plans having been submitted for the restaurant) into account, the property should be viewed as 'urban development', as also previously confirmed by the TDA. The designation of the total extent of the site as "Existing Urban Development" would be consistent with similar demarcations as indicated on various figures / maps contained in the draft Southern DSDF & EMF. It is our considered opinion that the total extent of Erven 701 and 551 should be viewed as "Existing Urban Development" and should be indicated as such on relevant figures / maps as contained in the Southern DSDF & EMF.	SDF/EMF	Site Specific	Not clear what this comments alludes to(?)
	COMMENTS ON THE SOUTHERN DSDF – AUGUST 2022 1. The absence of overlays zones of an Environmental nature as we believe that "green-lung areas" should be preserved if we are effectively to combat Climate Change. We believe that the Meadowridge / Bergvliet areas constitute such an area and future development plans should factor in this characteristic.	SDF/EMF	Environment	Identified green lung areas such as public open spaces, sportsfields, agriculture areas etc. have associated development guidance to protect and enhance them where possible or appropriate. A key manner in which to combat climate change in cities, especially low density sprawling cities (& Cape Town is no exception), is to become more compact and efficient (i.e. to density - appropriate to context). The Bergvliet area, and certainly those parts close to major public transport routes and urban node areas, is identified for future densification - with the proviso that this is appropriate to context.
	2. Although the Ladies Mile / Retreat Station extension is marked as medium term, +/- 10 years planning, there is no mention of traffic interventions at Huxley Drive or Emporium Circle- and these are extremely urgent.	SDF/EMF	New Dev. Areas	These proposed interventions are small-scale upgrade related, and are widespread across the city. This level of detail is beyond the scope of a district-wide policy - and indeed of policy itself.
	3. There is a need for a commuter cycle path along Boundary Road to Gabriel Road to enable cyclists to avoid Main Road without "running the gauntlet" that is the very narrow Boundary Road.	SDF/EMF	New Dev. Areas	The above comment response applies here too. The draft District Plan includes broad NMT development guidance. However, the City's Mobility Dept has its own very detailed planned NMT network and implementation programme. This is the dept to be engaged with on this matter.
	4. We would like to investigate the concept of the term "Local Spatial Development Framework". We believe that the District level is too extensive (Mowbray to Simon's town) and planning should be more localised. We have been trying to implement a Local Structure Plan for our area since 1994. We would like to engage with the City and integrate our Local Structure Plan as far as possible given the City's vision.	SDF/EMF	New Dev. Areas	The City is happy to engage further on this subsequent to completion and approval of the draft 2022 District plan. It is no longer possible to have local SDFs for every City suburb. However, constructive engagement towards collaboratively identifying key unique development guidelines for inclusion in a District Plan is encouraged.
	5. We would like to see the injunction that "densification and intensification" should be implemented in a manner that is sensitive to the existing "character" of the area clarified. This sentence is often interpreted very technically and often offends the ordinary meaning of the words.	SDF/EMF	Urban Development	The current draft Southern District Plan aims to achieve just this. However, the policy is quite clear, as is also the case in the approved 2012 District Plan, that in areas targetted for future densification and intensification substantial change to urban form is encouraged - notwithstanding natural and heritage environmental and other informants and constraints. Substantial parts of Bergvliet are located in just such an area. However, it is desirable and entirely possible that the best current character elements are retained but that the future emerging character is in fact better than that currently.

Climate Change This Association is in agreement that everything possible be done to mitigate the dire consequences of climate change both in the City, nationally and beyond. In this respect we would like to suggest the following : 1. That verges in suburbs, other than business areas and carriage way crossings, not be hard surfaced and that all coverings be required to allow water to permeate. 2. That private gardens in suburbs be encouraged and preserved and that a percentage area of "green space" be required for all erven in excess of 350 square metres. Coverage limitations should be strictly enforced and should include hard-surfacing. 3. That the extent of artificial grass permitted in residential areas, particularly dwelling house erven, be restricted to 25 square metres.	SDF/EMF	Environment	This is a matter that warrants further investigation. Much of this intersects with the MPBL zoning scheme provisions. The City's SUDS policy also has relevance, as does the City's new Resilience Strategy, and both should be interrogated as to responsiveness to this concern / imperative. This can be a matter picked up in future engagement with the City.
Densification The more tar, concrete and roofing the City has, the more heat is generated and the greater will be the water run-off for the City to treat or manage. The City's Densification Policy needs to be reviewed because densification is a catalyst for climate change consequences. Densification leads to smaller subdivisions and bigger and more built footprints which in turn lead to bigger and more hard-surfaced areas which do not permit rainwater to return to the soil but is instead directed into the stormwater system. More, and integrated "green space" also results in cleaner and cooler air. The contribution of private (as opposed to public) "green space" to air quality and the City-wide environment has been underated and unappreciated in the drive to promote densification. The emphasis should be on appropriate vertical densification not horizontal expansion to the detriment of "green space".	SDF/EMF	Residential	Disagree densification is a catalyst for climate change consequences. Densification may well (is likely to) lead to smaller subdivisions and bigger and more built footprints - although this needn't necessarily lead to bigger and more hard-surfaced areas - provided it is undertaken appropriately. The bigger point however is that the alternative to densification is urban sprawl - resulting in longer travel distance & other urban inefficiencies - & which will in fact be far more harmful re- climate change impacts. Other measures in association with densification can be prioritised such as increasing tree canopies etc. Quite apart from this Cape Town is on the coast and a cool ocean, and also includes a large mountainous national park area which is unique.
Subdivision We value the recognition of community opposition to the prevalence of subdivisions of larger (but not large) properties on the basis that a subdivision creates the right to have a second dwelling on both the "parent" property and the "child" resulting in densification based purely on economic advantage with no respect for the character of the surrounding area.	SDF/EMF	Residential	As has been responded elsewhere Cape Town will continue to grow irrespective. The logical response is densification appropriately applied according to context.
Character of Area The character of an area is largely based on the size of the individual properties as well as the streetscape and surrounding amenities. The character of an area largely determines the desirability thereof and therefore the value of the properties. Whilst the occasional subdivision will not change the character of an area, particularly where the erf size is in proportion to the surrounding properties, an increasing number will definitely change the character of an area – and if the attraction to the area was the erf size, a reduction in erf sizes and proximity to neighbours will have a detrimental effect on values.	SDF/EMF	Urban Development	The city is dynamic continuously changing entity. This includes demand and imperatives. Changing demands relate to changing family sizes, lifestyle requirements (lock-up-&-goes, security needs, retirement facilities, rentals due to greater worker mobility required etc.), and the city needing to become more efficient. Character will accordingly need to change, and in no way needs to be worse - just different - & often better ito urban living benefits.
Overlay Plans We believe that the use of overlay plans should be considered for areas with a distinctive character so that densification can take place in an orderly fashion without changing the character of an area – both in the provision for second dwellings and for subdivision. Given that revenue for the City is based on value, it does not make sense for the City to promote a policy, the implementation of which will see more properties of lower value and a concomitant decrease in the value of existing properties due a change in the character and therefore the desirability of an area.	SDF/EMF	Urban Development	Agree overlay plans can be a useful tool. However, these need to be very carefully considered. For one they should never be seen as a tool to stop change.

Infrastructure Capacity The Management Priorities are well identified, but it is questionable whether the capacity for major capital spend in the medium to long term exists. Encouraged densification without the accelerated investment in infrastructure will cause problems. It is trite that the railway infrastructure is inadequate to deal with the existing population let alone an increased population – which means the increased population will rely more and more on the road network – yet we note a decision to scrap the Main Road widening – which will result in traffic congestion and an inability to provide the BRT infrastructure which is used to justify increased densification.	SDF/EMF	Transport and Route Desgn.	Densification in relation to infrastructure and services capacity is an issue across the city. The fact is that the city is growing (whether we like it or not), and resources capacity to meet this growth is limited. Bervliet is not considered an area with anything like the infrastructure and services capacity constraints that many (if not most) other parts of the city experience.
Transport The transport corridor that is Main Road needs to be enhanced and the road reserve not handed over to low cost housing initiatives which in the event of civil unrest (as a result of a lack of economic opportunities) compromises the efficacy of the transport corridor. The disruption on the N2 by impoverished communities living on the periphery is an example. The failed railway network has resulted in increased private road use and taxi transport. Enhancing the Main Road corridor is essential to accommodating an increase in densification.	SDF/EMF	Residential	Agree that public transport - & especially high volume systems such as rail and the Main Road corridor generally - are a pre-condition to good urban functioning and need fixing and improvement as soon as possible. Civil unrest is a reality but is an urban management issue that needs attention. However, this should not negate pursuing orderly quality urban densification, especially in targeted growth areas.
Wastewater infrastructure We note with concern that the Bergvliet and Meadowridge areas have severe lack of capacity when discussing Waste Water infrastructure – yet no application for subdivision mentions this as a problem –such is the enslavement to the Densification policy. In fact, residents' concerns in this regard are ignored or minimized.	SDF/EMF	Utility Infrastructure	Densification in relation to infrastructure and services capacity is an issue across the city. The fact is that the city is growing (whether we like it or not), and resources capacity to meet this growth is limited. Bervliet is not considered an area with anything like the infrastructure and services capacity constraints that many (if not most) other parts of the city experience.
Business Encroachment We agree that business encroachment into residential areas should be discouraged and business activity within residential areas should be confined to "home businesses" and business hubs in the residential area that service the local community. In the Bergvliet Meadowridge area, we are of the view that save for the existing local shopping centres, business activity should be restricted to the Eastern side of Main Road and business creep up east-west roads should be prohibited notwithstanding that these roads may lead to local shopping centres	SDF/EMF	Urban Development	The proposed development guidance in this respect is very clear in restricting business activities to only low-impact activities (e.g. architects practice) and also restricting this only specific areas and routes.
Implementation Plan We note with concern the identification of Kendal and Ladies Mile Roads for intensification. These roads dissect relatively low-density residential areas that need to be preserved and any form of intensification would change the character of the area. The roads in question are link roads from Main Road to the M3 but that does not mean that they are suitable for intensification - and any intensification in Kendal road should be limited to the portion between Boundary Road and Main Road.	Implementation Plan	Urban Development	Please see above for response in relation to comments on issues of densification and impact on character in this area. The proposed development guidance regarding these roads is considered low-scale in nature and compatible with the locational advantages of this area and these key through routes, as well as in relation to having consideration for area character.
The extension of Ladies Mile Road to link with Consort road should be shelved. Bergvliet is not a development destination, like Tokai; it is a low-key residential suburb. Whilst it may relieve congestion at the existing Railway line crossings, it will create more congestion at the intersection with Main Road and result in increased traffic flow through a residential suburb, to the detriment of the suburb. It will also increase congestion at the Constantia Emporium circle. Ladies Mile Road is already heavily congested at peak hours.	SDF/EMF	Transport and Route Desgn.	Noted. This proposed extension has indeed been shelved.

	In our view, the East-West access from the M5 to the M3 should be restricted to Tokai Road, Kendal Road and the South Road extension. We would support the envisaged extension of Tokai road since it is already essentially a commercial node and enables an easy connection to the M3 on-ramps heading South and North. As regards the review of existing Road Schemes is concerned, we believe that Boundary Road, Diep River should be widened as it relieves congestion on Main Road and is the chosen route for access from the Bergvliet Meadowridge area to Constantiaberg Medi Clinic. Any increased traffic flow in Kendal road should be accompanied by suitable screening of the adjacent residential areas – with the reinstatement of the fencing along Kendal Service road to the South and Wodehouse road to the North."	SDF/EMF	Transport and Route Desgn.	These are detail matters beyond the scope of a medium-term policy report. They should be attended to by the relevant dept's (Urban Mobility dept etc) its programmes for future maintenance, upgrade and new infrastructure.
72	I was pleased to see that information in Volume 2 page 101 and 102, #8 (erven 17775, 17776, 17777) has been updated. However, confusion arose with the colour coding on Figure 18 (page 93 of Volume 2). Surely the colour coding on erf 17775 should be Potential Mixed Use? There is also contradiction of information on the Far South map Sub-District 4. It should also reflect Potential Mixed Use.	SDF/EMF	Mixed Use	This confusion has been attended to in the final draft District Plan as a result of this and other comments made in this.
	There is a lot going on in Sunnysdale, and yet the suburb name is not printed anywhere on the maps or diagrams? Circled as a District Node on diagram Urban Restructuring & Upgrading - Southern Implementation 1, Sunnysdale is inaccurately labelled as Masiphumelele. This was evident in other figures too	Mapping	General / Other	Not all suburb names are printed on the maps. Instead some are - merely for navigation purposes.
73	Sunnysdale Ratepayers association I endorse the submission of the Sunnysdale Ratepayers Association on the SDSDF and EMF dated 22 August 2022.	SDF/EMF	General / Other	Noted. Please see responses elsewhere in this report to the comments made.
74	Comments on the Draft SDSDF There is a general opinion among our nineteen members, the civics of the Far South that there is an urgent need for ECD, primary and high schools in our region. 1. We acknowledge the City for including within these documents, many of the Public Participation inputs that were made during previous SDF's at the district and local level.	SDF/EMF	Facilities	Noted.
	2. Errors and inaccuracies are still evident in the 2022 documents and maps. e.g. Volume 2 SDSDF 2022 Page 100, points 4&5: erf numbers need to be updated. 3. FSPCF document, page 2 - point 3 and 4 "Comments s15 and s16. This is covered in the SDSDF Vol 3 Implementation 1.2.1.b ii. Ou Kaapse Weg between Sun Valley and Tokai. We recommend that the priority of this road upgrade in the SDSDF is changed from "medium to longer term (10 years)" to medium to shorter term. 3. FSPCF document refers - Did the City say anything about: Bullet 2 "The need for increased household energy independence . . ." ? Implementation Vol 3, page 26, Table 4: Electricity Projects. The City claims it has enough capacity until 2045. SDSDF Far South Sub-district 4, page 94, Point 2. "... this area should be encouraged to become a "leading green economy area energy production and use." The principle and recommendation are there, the how needs to be conceptualised.	SDF/EMF	Site Specific	Noted. These errors have now been addressed.

	4. Heritage and heritage overlays. Fairly extensive policy is included in Vol 3 from pages 251 onwards as well as in SDSDF Draft 2 , page 37 Maps - Cultural and Heritage Resources. However, it is likely that the fault lies not in the SDSDF policy, but rather in the implementation of this heritage policy. 5. SDSDF Implementation, Vol 3. Point 3 Hierarchy of Nodes. Page 29, Table 5. We note that Masiphumelele is noted as one of the Top Areas Of Need requiring: 2 sports fields, 1 secondary school, 1 primary school, 1 community park and a new/replacement clinic for Masiphumelele. These facilities should be prioritised ahead of housing (for an additional influx of residents) as these facilities will contribute to the well-being and upliftment of the community with education being primary. With education and upliftment, will come a better understanding and concern for the environmental issues. 6. In conclusion, the collective documents (MSDF, SDSF, EMF etc) contain a vast amount of information and data, with the majority of the queries and concerns posed by the community, covered therein.	Implementation Plan	General / Other	Noted. Although not to be approved as a statutory document (unlike the Vol 2 Technical Report) the Implementation report (Vol 3) is nevertheless an important component in that its objective is to bring greater alignment into planning & prioritisation of future public investment & development.
75	We specifically refer to page 76, Item 4 of the Volume 2 Draft Technical report, and comment as follows: 1. The document refers to Erf 16 and then lists the 4 erven currently occupied and used by SARDA i.e., Erf 141, 142, 560 and 684. Please can you explain the reference to erf 16 and provide any supporting documentation such as SG Diagrams or Title Deed noting sheets to explain the reference to erf 16.	SDF/EMF	Site Specific	Erf 16 relates to the former erf numbering system for this area but this has been amended to the new ascribed erf numbering for here (as well as other areas across the city).
	2. Regarding future use, and the reference to residential infill we would not support residential infill for the following reasons: a. SARDA currently uses all the Land, and SARDA's operations comply with the zoning and the by-laws in terms of its operations and its spatial planning in relation the surrounding residential and its relationship with horses. b. A reduction in the land size will increase the operating costs of SARDA from a feed perspective. c. A reduction in land size will have an impact on building line restrictions, health restrictions and SARDA's related business restrictions in respect of the interrelationship with horses, stables and the surrounding neighbours. d. More than 50% of SARDA's income via fund raising, is attributable to the utility of the current Land, that also generates economic growth from the Film Industry, Equestrian, Sport and Community Fund raising initiatives. e. SARDA is of the view that the relaxation of zoning restrictions on the existing residential component in the area has and will continue to satisfy the need for densification. f. The Land is near to opportunities and services. The Land is serviced with Municipal Services and provides the ideal location for all the 16 Schools that SARDA services to participate in a fair, equal, and inclusive manner includingsupporting diversity. The above is supported by the fact that SARDA has occupied the site and serviced diverse communities on the land for 40 years without complaint.	SDF/EMF	Site Specific	SARDA (a lease-holder on land not owned by the City) is acknowledged to be a valuable activity within the city, serving the needs of the disabled community (special needs institutions), and that a place for this should be supported somewhere. Hence the current development guidance in relation to this for this site. However, this site is one that was originally identified for local area community facilities which are generally acknowledged to no longer be required given changing community facilities standards, prioritisation etc. The site is also one of few large sites in Constantia that is not in private ownership and therefore potentially available (in part or full) to assist in addressing a major issue in Constantia which is general 'restorative justice' relating to past historical injustices in this area. Attention should be given in future to assessing the potential for some rationalisation of the SARDA facilities (if they are not ever to be relocated) to also make provision for a small 'restorative justice' orientated residential component that (at the very least symbolically - if not materially) contributes, along with other identified NDA sites, towards addressing this issue across Constantia.
	g. SARDA is a Job creator and has continued to be, since its founding in Philippi from where it grew into an organisation that has supported over 19 schools and institutions, over 9500 people living with disabilities (85% from previously disadvantaged and disabled communities- despite previous apartheid laws). In addition, over 119 Volunteers and supporting businesses are accommodated as part of SARDA's operations. Municipal Services and Opportunities are indeed ideally provided for on the current properties occupied by SARDA, at no additional expense to the City. h. Increased traffic volumes will have a negative impact on both existing infrastructure and on the horses, children living with disabilities and the environment.	SDF/EMF	Site Specific	See response to comment above.
	3. Regarding future use, "Community facilities", we support this use as it speaks directly to the current zoning, SARDA's Constitution and planned educational and medical growth initiatives, and the use for schools, educational and medical institutions that was always intended and included in the property title deeds.	SDF/EMF	Site Specific	See response to comment above.

	4. Regarding Development Opportunity, the document SDSDF refers to "the unutilised section of the site". This is incorrect as the entire land parcel consisting of 4 erven is utilised by SARDA:	SDF/EMF	Site Specific	Noted. However, this does (& should) not detract from the wider imperative (as stated in the sub-district development guidelines 11 & 12) of assisting with addressing broad community 'restorative justice' somewhere in Constantia relating to past historical injustices in this area generally. Notwithstanding meeting the SARDA land use needs (including in respect of invested infrastructure etc.), this site, or part thereof, is one of few potential areas in Constantia that have potential to contribute in this regard.
	a. In terms of the City Space requirements for the keeping of the number of horses on the property that services 16 Special Needs Schools. A reduction in the land would lead to a reduction in the number of horses and concomitant classes that can be held on the premises. b. The land is maintained by SARDA and apart from its buildings, is used for grazing purposes to reduce the cost and impact of importing costly food to sustain an organisation that serves 16 Special Needs Schools, free of charge. c. The land is used as a critical public refuge/safe area in the event of emergencies such as fire. By way of example, the City may recall the use of the SARDA land for housing animals and people evacuated from the great fires of 2015 and 2019 that threatened the Heritage of the entire Constantia region; much like the recent fires that devastated UCT and other Heritage buildings. d. The land is one of the last green lungs of the area that if densified, will cause a loss of utility and sense of space to the community and is likely to reduce adjacent property values.	SDF/EMF	Site Specific	Noted. Valid points. However, see response to comments above. As per the guidelines in the draft District Plan it is believed there is place for accommodating both activities on the site. Please note that these development guidelines are in the existing approved District Plan approved in 2012.
	5. If a more advantageous site could be found, SARDA would be willing to work with the City and the Community, to realise such an opportunity provided that such an opportunity is fair, just, equitable and financially and economically viable.	SDF/EMF	Site Specific	Noted.
76	Densification - Wynberg Not against densification of Wynberg. However: 1. it has to be done in a way that the well known/loved character of this charming old world suburb will not be destroyed as has happened in especially the Main Road but also elsewhere in Wynberg. 2. I strongly object to high rise buildings/apartment blocks higher than 2 stories, 3 at most. Grand Central in Main Road is a nightmare. You should be aware of these problems; lack of payments of rent, the removal of garbage proved to be problematic as rules of depositing garbage is not followed by residents and there have also been complaints relating to drugs. SO PLEASE NO REPEATS OF GRAND CENTRALS IN WYNBERG DENSIFICATION.	SDF/EMF	Urban Development	The Grand Central development problems are a management issue, and as regrettable as this is it should not be reason to deviate from the general city approach for densification in well located parts of the city (ie where access and opportunity potential is highest). Wynberg is one such area - and the District Plan policy (both current and that proposed to be approved) as well as the MSDP are quite clear that substantial densification and intensification of the Wynberg CBD area is to be supported.
	3. 2/3 Storey buildings will be more suitable, not only should it minimize the blocking out of light but also too much densification will cause overcrowding of our already very narrow side streets. Please bear in mind that many of Wynberg roads were laid out in a century when horse and cart were still mostly the form of transport.	SDF/EMF	Urban Development	This argument could also be applied to the City CBD (city bowl) area. However, the city will continue to grow - & concentration in optimal locations brings increased local and wider area benefits. Clearly, however, in historically valuable areas such as Wynberg appropriate development sensitive to context is a very important issue.
	4. Most importantly, building inspectors should do an efficient and honest job, ie the apartment block on the cnr of Wellington Ave and Malton road. It clearly infringes boundary limits. 5. A big concern for me about densification of Wynberg is the reality that Cape Town City Council has a major housing problem that has for various reasons escalated drastically the past couple of years. My fears are that hasty decisions will be taken to find quick solutions and in a couple of decades into the future, Wynberg will again be saddled with problems similar to what it has been experiencing in the past. In other words, we are not finding lasting solutions but will be simply perpetuating, even worsening Wynberg's problems.	SDF/EMF	Urban Development	This is a management issue (& beyond the scope of the planning policy).

	6. Developers must please honour our wishes to ensure enough greenery/ gardens of new apartment blocks. Regarding Wilson Road: I noticed on the map indications of registered servitude markings the following: Nr 15(my semi that I own), 19 and 21 are privately owned. 15/17 and 19/21 are semi detached homes, nr 23 are a row of cottages that belong to the council. Why is nr 19 marked as servitude and not 23?	SDF/EMF	Residential	Noted. This is detail that needs addressing in all new development. However, in general, in targetted densification areas it must be accepted that there will be less private open space (gardens) - and therefore greater emphasis required on quality public open spaces (both hard and soft spaces).
77	Objection: Development of portion(s) of Fish Hoek Sports Fields 1. Green spaces in urban environments & WHO recommendations The value of Green spaces in urban environments, such as the Fish Hoek Sports fields, are well established: benefits of these urban Green spaces include environmental benefits such as mitigation of extreme temperatures during hot seasons, enhancement of biodiversity and	SDF/EMF	New Dev. Areas	This is not disputed. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsidising alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Succesful precedent exists for this in the city.
	2. "Preserve Green" The CoCT refers to "preserving and enhancing Green" in their Environmental & Climate Change action plan7 as well as the DSDFI, and then directly contradicts this by proposing that an existing Green space be reduced, to increase the 'grey' in the environment. It is not clear why existing spaces that do not serve the general public and does not contribute to Green usage space, such as the fenced area surrounding the False Bay hospital, is not instead earmarked for potential development. These areas are not accessible to the general public, and are standing vacant.	SDF/EMF	Urban Development	Agreed. However, the area mention does not constitute a 'new' development infill area so much as a potential redevelopment area (including expansion) which is generally advocated in this policy document.
	3. Unclear plan of utilization The current DSDFI refers to 'potential residential, office or recreation related infill' as potential future use of the proposed site to be utilized. This vagueness is extremely problematic, as clearly highlighted by members of the public at the Public Participation meeting of 18 August 2022: the current infrastructure in Fish Hoek and surrounds does not even support the existing residents,	SDF/EMF	Urban Development	Redevelopment of this area through (short term & long term annual) cross-subsidising alternative uses is the principle being proposed here - that can be realised without compromising, but actually enhancing, open space & sports facilities. At this (very early) stage it is not possible to specify what exact development might happen here. This would need to be the subject of an actual development application - which is likely many years away. However, the principle is that whatever the development it must have as its primary aim the enhancement of the sports complex (so low income housing inappropriate as can't cross-subsidise). Related is that it must be appropriate to context. Office or residential could be seen to fit this, but not commercial (eg shopping centre).
78	Sunnydale Residents Association's proposals I would like to endorse the Sunnydale Residents Association's proposals in their entirety.	SDF/EMF	Site Specific	Noted. Please see responses to these issues elsewhere in response to the SRA.
79	Traffic Congestion Currently 1. During peak school traffic hours (weekdays 06h30 – 08h00 and 13h00 – 15h30) there is significant traffic congestion on the following roads (marked in red on the diagram): • Waterloo Road, south into St John's Road • Waterloo Road, north into St John's Road • St John's Road In the future 2. The proposed densification of Wynberg is likely to contribute to additional congestion on the roads listed in point 1. above. 3. The proposal for increased office and residential space surrounding the military hospital will see an increase in traffic volumes in the area.	SDF/EMF	Transport and Route Desgn.	Noted. However, the resolution to this in general is to get people out of cars and into public transport. There are obviously many associated issues. Safety & security is a problem. Public transport provision is currently inadequate. Traffic flow management could be improved. Shared car ridership could be greatly increased. etc etc. However, Wynberg area generally is & will remain a targetted densification area in the city given actual and potential access and opportunity potential. To not densify means that future growth is instead to be channelled to other parts of the city - including to already very dense areas as well as the urban periphery (& beyond) which will i the longer term have massive cost implications for the city - & all of us residents within it. Happy to discuss further - or discuss with pupils - as this is a particularly important issue.

	PROPOSAL FOR THE COMMITTEES CONSIDERATION Traffic congestion is undesirable owing to time wastage and additional fuel consumption and resulting environmental damage. Additionally, high traffic volumes and traffic congestion in a school precinct pose a risk to the safety of pupils. We ask that the committee considers restoring the SANDF access controlled roads (Fort Street, Nassau Road, Hospital Road and Camp Road) to public access roads. This will allow some of the peak hour school traffic, as well as any future traffic volumes, to use these roads reducing the congestion on Waterloo and St John's roads.	SDF/EMF	Transport and Route Desgn.	This is an issue (which makes a lot of sense but which is) outside the ambit of this policy and needs to be taken up uni / bilaterally.
80	Densification of Wynberg As a lifelong resident of Wynberg, I strongly object to this proposal of the Densification of Wynberg. My concerns are: 1. This will drastically increase crime in the area. Law enforcement cannot cope with the crime at present so we will be overrun if this project is enforced. 2. The historical parts of Wynberg will be lost. 3. The people destined for this housing are not from the area and are part and parcel of those who were dumped in Wynberg after the Covid pandemic. 4. How many of the people this project is intended to assist are actually RSA citizens and not "false" citizens.	SDF/EMF	Urban Development	This policy is quite clear, as is also the case in the approved 2012 District Plan, that in areas targetted for future densification and intensification substantial change to urban form is encouraged - notwithstanding natural and heritage environmental and other informants and constraints. Substantial parts of Wynberg are located in just such an area. However, it is desirable and entirely possible that the best current character elements are retained but that the future emerging character is in fact better than that currently. Re- heritage matters - this argument could also be applied to the City CBD (city bowl) area. However, the city will continue to grow - & concentration in optimal locations brings increased local and wider area benefits. Clearly, however, in historically valuable areas such as Wynberg appropriate development sensitive to context is a very important issue.
81	Sunnydale Ratepayer Associations submission Support and endorse submission	SDF/EMF	General / Other	Noted. Please see responses to these issues elsewhere in response to the SRA.
82	Sunnydale Ratepayer Associations submission Support and endorse submission	SDF/EMF	General / Other	Noted. Please see responses to these issues elsewhere in response to the SRA.
83	Wynberg East has been a proposed HPOZ for many years. Wynberg East has existing social infrastructure, which still functions and there seems to be a strong case for Wynberg East, especially given the generational continuation (without disruption) the institutional heritage of schools etc, functioning corner shops, small businesses, barber shops, integration, etc.	SDF/EMF	Urban Development	Noted.
	Our concern centers around the areas of: 1. Transport 2. Housing 3. Infrastructure We are not opposed to development, but it cannot be done at the expense of the HPOZ, which is in place to mitigate uncontrolled development of an established urban community. We must recognise the need to protect and support the natural environment and heritage (tangible and intangible) of Wynberg East.	SDF/EMF	Urban Development	This policy is quite clear, as is also the case in the approved 2012 District Plan, that in areas targetted for future densification and intensification substantial change to urban form is encouraged - notwithstanding natural and heritage environmental and other informants and constraints. Most if not all of Wynberg East is located in just such an area. However, it is desirable and entirely possible that the best current character elements are retained but that the future emerging character is in fact better than that currently. This challenge is also confronted in other well located heritage areas such as Mowbray and the City CBD (city bowl) area. However, the city will continue to grow - & concentration in optimal locations brings increased local and wider area benefits. Clearly, however, in historically valuable areas such as Wynberg appropriate development sensitive to context is a very important issue.
	We cannot believe that Harfield village was declared an HPOZ and that Wynberg with so many more settled residents, a community with a built up identity (having escaped the exploits of the Group Areas Act) infrastructure and history in comparison, was not declared as yet. Why not? No issue with Harfield village being declared, but Wynberg East makes for a much better case while the city has kept it as a proposed HPOZ for far too long. Why??	SDF/EMF	Environment	Noted. However, this is a matter to address through the City's Env Management Dept heritage section.

84	Sunnydale Ratepayer Associations submission Support and endorse submission	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
85	Development of FishHoek's Sportsfield hereby lodge our objection to the proposed development to Fish Hoek Sports field for the following reasons : 1.Influx of people due to additional buildings (dwellings and offices) 2.Strain on services ie water, sanitation, electricity 3.Shrinkage of green belt. Land is becoming limited without having to add more development. Rather upgrade the existing sport facility to attract players and put Fish Hoek back on the sporting map.	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Succesful precedent exists for this in the city.
86	Sunnydale Ratepayer Associations submission Support and endorse submission	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
87	OBJECTION TO FISH HOEK SPORTSFIELD DEVELOPMENT	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Succesful precedent exists for this in the city.
88	General Comment: There are numerous cross-referencing and consistency items to be addressed in the final documents. Some examples of which are: Structure of District Plan Documents - headings differ from district to District. d. Misalignment of SDF Maps and Sub-district Maps There are a number of inconsistencies between the overall draft spatial development framework (SDF) maps for each district and their associated sub-district maps. This creates confusion in applying the designation and relevant development priorities per area.	SDF/EMF	General / Other	Noted. These issues are all being addressed in the final revision of the MSDF and the 8 district plans.
	High Constantia Shopping centre and surrounds: Erven 2133, 2134, 2136, 1063, 9548, 12966 and 13898 must all be coloured in as "urban development" not green space, as 5 of them are zoned SR1, and 2 are commercial (general and local business). Sub District4 For NDA 10, portions 1 and 2 of farm 1529: remove Core biodiversity designation. Portion 2 is an existing school (Generations School), portion 1 is an approved (unbuilt) school).	SDF/EMF	New Dev. Areas	Noted. These issues are all being addressed in the final revision of the Southern District Plan.
89	Proposed New Development on Fish Hoek Sports Field. We are opposed to this development for the following reasons. 1. The traffic in the area is already at its limit. 2. More people in the area is also overloading our sewage and water systems which is already bursting causing many pipe bursts and extensive maintenance. 3. This is the only open recreation space and sports facility in Fish Hoek. 4. More development in this area will also cause more structural problems to exciting buildings and future buildings. 5. This area which includes the recreation/sports fields is all built on a refuse dump.	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Succesful precedent exists for this in the city.

90	Response to SDSDF and EMF August 2022 City doesn't take into account knowledge of our area with what properties are or are not available There are a few key ways that this proposal doesn't address how our area functions (or doesn't function) : The first being the foot traffic in our area. For example - there is a beautiful new taxi rank that has been built - but there are still constant taxis that drop their customers off on the south side of Kommetjie Road at the bus stop as its easier If there was to be high density housing built on the south side - this proposal would add an enormous amount of foot traffic all over Kommetjie Road which makes things extremely dangerous,	SDF/EMF	General / Other	The taxis issue is essentially a management related issues beyond the scope of this policy report. Foot traffic crossing Kommetjie Road is a serious concern and will have to appropriately planned and provided for with any significant future urban development south of Kommetjie Road.
	Currently the most logical entrance would then be Wood Road - but putting the entrance on that road directly impacts our neighborhood with nothing in this plan that addresses our safety concerns. It is well known that the resources of law enforcement is too limited for our area - so adding housing without a plan for furthering the resources needed for the people here doesn't address our actual needs - traffic safety concerns, for example, turning right from Wood Road is extremely dangerous - due to the limited traffic lights in the area Traffic congestion	SDF/EMF	Crime and Safety	Proper planning for access will need to be undertaken, including all necessary legal processes where required (eg. a TIA). Safety concerns are an unfortunate reality facing all communities across the city, and whilst certainly needing to be addressed as best possible, this should not be a reason not to develop if undertaken appropriately and as far as possible optimally.
	bringing more commerce and tourists into the area - not more housing provide spaces for the resources this area desperately needs - We need law enforcement and social services desperately	SDF/EMF	Mixed Use	The reality is that there is a need for both economic opportunities and residential opportunities in this area.
	Need employment opp - housing leads to more people coming to area. No infrastructure in place to handle future growth. I support the proposed only low or potentially medium density formal GAP housing only south of Kommetjie Road that are no more than two stories or a height equal to the Kommetjie Fire Station building, and rather safety and social services as this meets the needs of our area most effectively.	SDF/EMF	Mixed Use	Noted. The site is likely needing to meet both facilities and some residential requirements. Note that the current provisions of the zoning scheme (DMS) essentially permit as of right 3 storeys of development.
91	Development on Fish Hoek Sports Field - only public recreational area of any size in the whole of Fish Hoek and, contrary to Council opinion, is extremely well utilized. well known that regular exercise is fundamental in preventing many of the chronic diseases which plague this country today understand that the various sports clubs are supportive of some future development as they stand to gain financially. However, the sports fields are not for the - exclusive use of the sports clubs – they are for the benefit of all Fish Hoek residents whose rates are used to maintain them. • The increased infrastructure in terms of water supply and sewage disposal will only add to the burden that these facilities are already under. • There will also be an increase in traffic into a quiet residential area. • In terms of the environment, we should be maintaining as much open, undeveloped spaces as possible, not destroying them. Once developed, there is no going back. • The City of Cape Town, like any municipality, should have the interests of all the people it serves as a priority, not monetary gain at any cost .	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsidising alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Successful precedent exists for this in the city.

92	Living Hope Trust, Erf 17776 response to SDSDF (and our original response to the Masiphumelele SDF) proposed Mixed Use Status on Living Hope's land (Erf 17776) in which you assured me that this was the best option for us regarding our diverse Social, Health, Agricultural use of the land. Please note our strong comments in the SDSDF that we want the proposed Mixed Use Zoning to be guaranteed to us as we believe our purpose and our land's positioning is only suited to Mixed Use. I am disturbed by a comment in your recent email to Trish Wood and Chris Dooner (Sunnydale Ratepayers Association) that Living Hope land (Erf 17776) should revert to colour Orange for Medium to High Density housing. This flies in the face of everything we do as an NGO do and want to continue to do in offering our further services in a Social Services Corridor. It also is contrary to what we stated in our Masiphumelele SDF and it seems that those comments were taken into consideration of the SDSDF as presented. We do unequivocally request that the proposed zoning remains Mixed Use.	SDF/EMF	Mixed Use	Perhaps if I can try & clarify both the existing & future zoning situation as well as what the reviewed draft Southern District Plan is (or is not) proposing. The current zoning on the Living Hope property is Rural. This zoning will remain into the future (as the guide for any future land use development) until such time as an application (from yourselves) were to apply to change this. The revised Southern District Plan proposes a 'designation' for this site (& of course all others). This designation does not give any further rights or take away any existing rights so has nothing to do with 'zoning'. It is merely a guide as to what the preferred future development outcome for that site is. As indicated in my response to Trish what we (the City) do not want is for a designation to send out an incorrect signal. Of course this also precisely your point. However, the designation of Mixed Use Intensification (MUI) is generally associated across the district with business and commercial uses as well as residential. And as indicated the District Plan wishes most importantly to convey that no commercial activity should be considered south of Kommetjie Road in this area. Hence my comment that MUI should not be indicated south of Kommetjie Road (including at Living Hope). Living Hope is a designated NDA – but should instead be aligned with the guidance for Solole, for the Lochiel Rd smallholding area, and for the site at corner Noordhoek Road & Silvermine Road – all of which indicate the site as yellow or orange – but which also include associated text for each site explaining that this designation should allow for residential & institutional / services land use activities. We can /will however consider if yellow (lower density) is a more appropriate designation than orange (although it is directly opposite Pokela Road &
	Attachment Comments 1. Main Comments re Erf 17776 Southern side of Kommetjie Road needs to be zoned to be service related not housing related. 2. In agreement that Erf 17776 has been zoned mixed use - correct future zoning - resist any future attempt to change it back to medium density housing. 3. p94, p5 and p6 - Supporting dev guidelines: point 2 p 94, 95 and 96 - leading green economy area supported. Stormwater management will need to be improved - flooding Point 4 - identified mixed use nodes along the route - agree. Informal traders along road with no structure - upgrades to address this and well planned when final Kommetjie Rd upgrade takes place. Point 5 - disagree with concept of up to max 4 storeys - do not support any buildings along Kommetjie road to be 4 storeys - support 2- 3 buildings - this would form a homogenous design along southern side of road. Point 17 - scenic route upgrading - support as this would benefit Masi.	SDF/EMF	Residential	Noted. The area for proposed 4 storeys is only within the identified urban node area (in the vicinity of the top / southern end of Pokela Road. This is not something proposed anywhere else along Kommetjie Road.
	p 98 - Sun Valley, Sunnydale, Capri, Masiphumelele specific add integration is enhanced with upliftment - physical integration vs social integration	SDF/EMF	Site Specific	Noted, and text has been amended accordingly.
	Points for inclusion in point 10 - low to medium density south of Kommetjie road, safety and social services on the Solole property are supported, necessary and desired, incremental growth and consolidation, formal housing only and aim towards upgrading / uplifting Masi	SDF/EMF	Urban Development	Noted. This is generally already included in the development guidelines.
	Point 11 word of those growing concern - rather use existing as this area is marked for incremental growth. . Dev is supported only if it service related and mixed use.	SDF/EMF	General / Other	Not clear what this comment alludes to(?)
	Pages 100 and 101. Points 4 and 5 Capri: Erven CA953-13, CA953-12, CA953-31, CA953-30 etc. Do not agree with wider range of housing options - remaining undeveloped land on southern side is owned by Living Hope and designated for mixed use - we want to be able to farm and train farmers want to health care or substance abuse centres etc - mixed use give us these opp.	SDF/EMF	Urban Development	Noted. The development guidelines do not affect existing rights or the intentions of the current landowner.

	Pages 101 and 102, Point 8, "Solole et al Kommetjie Road: Comprising Erven 17775 (Solole), 17777, and 17776 Potential for public facility - this should be priority on this erf as law enforcements and safety services are greatly needed. Update figure 18 on p93 to say mixed use on Solole propoerty to bring it in line with correct information on point 8 on p 101 and 101. Point 2 - we may support limited GAP housing on this property with med to low density.	SDF/EMF	General / Other	Management related issues are beyond the scope of this policy report.
	Volume 2, page 93 - Figure 18 Sub District 4. The Far South Fig 18 needs to be updated to accurately reflect staus of above propoerties. It does not align with correct inforamtion in Vol 2.	SDF/EMF	General / Other	This has now been attended to.
	Dark Orange of Erf 17775 is inaccurate and restrictive - misleading and thwarts potential options or desired outcomes. Note theres noe public service dev on Erf 17775. This property is in demand for further safety and security facilities	SDF/EMF	Facilities	This has now been revised and will / does reflect the sites as MU.
	Ou Kaapse Weg between Sunvalley and tokai: Motivate that this upgrade should be changed to read short to medium term	SDF/EMF	Transport and Route Desgn.	This can be but this prioritisation is done in liaison with the Mobility Dept which has many top priorities across the city.
	3. Hierarchy of Nodes We note that Masiphumelele is listed as one of the "Top Areas Of Need" requiring: 2 sports fields, 1 secondary school, 1 primary school, 1 community park and a new/replacement clinic for Masiphumelele. These facilities should be prioritised as these facilites will contribute to well-being and upliflmt of the community.	SDF/EMF	Facilities	The City is aware of public investment and services requirements for Masiphumelele and is attempting to plan accordingly. However, given increasingly limited resources, City (& other Govt) depts have to prioritise their actions. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Masiphumelele is a key area in this regard - & has been identified in the new draft District Plan as a (one of very few) priority USAs (Urban Support Areas) across the city to highlight and guide future public investment.
93	FoCVGB comment and objections on the DMSD plan 2022 FoCVGB's involvement with the Draft MSDP, plays a vital role in the Constantia Valley in the upkeep, maintenance and implementation of projects associated with riverine, wetlands and Green Belts.	SDF/EMF	Environment	Noted.
	Irregular mowing schedules further compound our frustrations, add to the shoddiness and neglected appearance of certain greenbelts and thus encourage vagrancy and squatting eg Doordrift Greenbelt. We implore the City to become more progressive and involved in coordinating their efforts with FoCVGB so as not to duplicate efforts and thus prevent unnecessary expenditure.	SDF/EMF	Environment	These are maintenance and management related issues, and although very important, are beyond the scope of this policy report (which provides development guidance).
	With regard to the DMSDP the following is provided: The "vision statement" must include "heritage" to read "renowned for its natural, cultural and heritage beauty". And include "natural" to read "and, sustainable natural and urban areas". Page 16 of the MSDP provides for: that the Critical Natural Assets - the rivers, wetland, conservation areas within the urban edge must be included within this definition. The document does refer to protection as required but these areas are not given adequate recognition and protection.	SDF/EMF	Environment	These areas are given as much protection as possible within the realm of a planning policy. The vision has to be as succinct as possible, and it felt that inclusion of the word heritage adds unnecessarily to intent and content of the vision as currently described.

There is mention that buffers (relating to World Heritage Site/ formal protected areas - but this should include natural assets) are critical but not provided for in the document as part of the spatial vision. We refer particularly to protection measures for these areas within the urban edge. Page 19: Page 19 includes that: Protected green network of core natural assets and open space areas - linking river systems and other open space corridors but this needs protection that is lacking in the document. In fact the Green Infrastructure Network GIN is about how development should take place and not whether it will be protected from development. Page 26 last paragraph refers to the GIN providing a degree on guidance on to "how" and not "whether or not". It must however be stressed that there are areas of riverine, wetland and green open spaces that require no development in order to protect those spaces and natural systems. Management is a key issue but in terms of land use applications there must be limits to development within natural areas.	SDF/EMF	Environment	As per the response above these areas are given as much protection as possible within the realm of a planning policy.
It is of concern that Table 5 on page 28 does not specifically include Constantia rivers and wetlands, and conservation areas. Please include these in Table 5. Page 31 table under Conservation and Biodiversity Priority Zone, we are very concerned that the Constantia rivers, wetlands (for example Pagasvlei and Groofbosrivier) and open spaces have not been listed in the Core 1 Protected and Conserved areas. The Core 1 areas should include the Constantia wetland areas. In fact the Core 1 areas should include all the rivers. In order for the City to be resilient these natural systems must be regarded as critical areas and not just open spaces, sports fields and storm water retention etc as per Core 2 areas.	SDF/EMF	Environment	The areas included are purely by way of example and cannot be comprehensive and all-inclusive of all such areas.
The GIN map on page 36 does not identify the Constantia Valley rivers and wetlands which is an omission. These areas need to be demarcated as important sites of biodiversity and worthy of protection. These are natural systems and must be recognised as such. These sites are after all irreplaceable.	SDF/EMF	Environment	Noted. The next GIN revision must address this matter.
Table 16 non-coastal based destinations should include the Alphen and Diepriver greenbelts and riverine areas. This is an important birding site for the growing tourism of birding as well as linked to the Alphen Hotel complex and continuing along the riverine areas to Honhenhort Hotel.	SDF/EMF	Environment	Constantia as a whole is essentially a destination place, but this relates to the area generally and not one particular focus area or site. There are similar situations in many other suburbs (eg. Noordhoek, Muizenberg) but these are also not identified specifically as such. Part of this is having a generally consistent approach, and also balancing site identification in this district with (the general relative paucity in most) other districts. It is argued that neither the Diep River or Alphen warrant particular mention over numerous other areas in Constantia and elsewhere.
Page 76 FoCVGB does not support the New Development area of SARDA for densified housing development and the loss of the green open space. This area provides a natural buffer to the built environment and should be maintain and enhanced as a green public space. It is further part of the green infrastructure network. The City purports to promote linkages between the riverine systems and open spaces. This must be implemented in this regard.	SDF/EMF	New Dev. Areas	This site has long been identified as an urban infill site - & is included in the currently approved 2012 District Plan. SARDA is currently just a leaseholder for land always intended for (or to include) some form or other of urban development. The current guidelines for the site are thus considered appropriate in terms of the site context.
Volume 3 is an implementation plan however there are none for the Constantia valley rivers, wetlands and green open spaces. Table 8 has omitted all of the Constantia valley river, wetland and open spaces. These are critical areas and must be included. This may be part of the problem as to why the rehabilitation, indigenous plants and management of these areas are falling on the role of the public and civic organisations without the necessary support of the City.	Implementation Plan	New Dev. Areas	This is important areas but have historically received sufficient (or more) attention - certainly in comparison with most other areas of the city. Hence it not being identified as future priority area.

	Section 1.6 provides none of the necessary green infrastructure implementation mechanisms. This is detrimental and an omission and must be rectified. Environmental sustainability must be funded and resourced by the City. The City with its partner agreements to achieve environmental targets must prioritise funding and mechanisms to perform projects to meet these national and international agreements. It is of further concern that the City may be implementing the use of Open Spaces for mobile business operators – we implore the City to discuss such matters with CRRA and FoCVGB and to involve us in the deliberations on how this will be implemented, sites chosen, managed and policed (enforcement).	SDF/EMF	New Dev. Areas	Funding should be prioritised everywhere across the city, but is simply not possible with increasingly constrained resources. Partnerships with private sector players will become increasingly important in ensuring critically important assets are not only protected but suitably enhanced.
94	Capri Neighbourhood Watch (CNHW) Content of comment the same as Living Hope submission and Sunnysdale Ratepayers Association	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA and Living Hope comments.
95	Endorse Sunnysdale Ratepayers Association Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
96	Endorse Sunnysdale Ratepayers Association Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
97	Endorse Sunnysdale Ratepayers Association Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
98	Endorse Sunnysdale Ratepayers Association Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
99	Endorse Sunnysdale Ratepayers Association Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
100	Future plans Fish Hoek Sports Grounds I would like to place an objection to the (future) proposed development of the above mentioned facilities. These are the only facilities for adult and open (as opposed to school) ball sport in the deep south area. The Massi soccer field has been used for housing after the recent fire and their soccer teams are also using these facilities as well as impromptu groups later in the evening and over weekends. These fields are not "underutilized" as claimed. They are all used by the various sporting groups every week. The Fish Hoek sport umbrella does not represent all those who enjoy these open public spaces and should not speak for everyone else. They have been seduced by the vision of all that money to buy at least two astroturfed surfaces. At R 5 to 7 mil this is PURE PIE IN THE SKY hopes. It will never happen and once that property has been given to a developer IT WILL BE GONE FOREVER. It cannot be taken back again. With the City going for densification the demand for open play/recreation space will only increase. What a shame it will be to tell them in the future that the sports grounds were there, but were thoughtlessly given away. The residents of Nelson Road have had no say in this matter and will have the value of their properties severely affected	SDF/EMF	Environment	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Successful precedent exists for this in the city.
101	Endorse Sunnysdale Ratepayers Association Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.

102	I object to the Fish Hoek Sports Field proposed development. IS NOT FOR SALE NOR FOR ANY TYPE OF DEVELOPMENT OTHER THAN FOR SPORTS. It is designated Open Space. It is NOT under-utilized. With Masiphumelele Sports Field being used for housing, even more reason that every inch of the Fish Hoek Sports Field will be overflowing. With more densification this Sports Field will need to be ENLARGED not portions picked off to make it smaller!. I oppose any suggestion of non sports development. I oppose Cape Town City Planning telling us that this section of the Sports Field mentioned in the MSDF should be developed for low cost housing. That is for Public Participation. Once this portion of the Field is given to a Developer it is gone, never to be used for Public Sports Facility again - how do we explain this to the children of the future? The Fish Hoek Sports Clubs Association are not speaking for us, they have an agenda which does not include the public/residents rights, & is not in the Public's interest.. They may not speak for us.	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Successful precedent exists for this in the city.
103	THESE ARE COMMENTS FROM OUR BARBAROSSA RESIDENTS' GROUP (BRG) ON THE CITY'S RESPONSES TO OUR INPUT IN 2021. S_138.1.1 City's response: (see response for S_5) Our response now (August 2022): It is nevertheless a strange move to reduce Public Open Space at precisely the same time as promoting densification, increasing the number of dwellings on any erf here from one to at least three. Houses lose their gardens, but the park is reduced in size.	SDF/EMF	New Dev. Areas	The id of this park as an NDA has been rescinded (in response to public comment). However, a general statement is instead included in the development guidelines that speaks to the need to address 'restorative justice' in Constantia not just through the few remaining identified NDAs (new development areas) but also through additional means of introducing where and as appropriate a wider range of residential types that meet the needs of a wider section of society.
	S_138.1.2:Our response now (August 2022): It is appreciated that City planners are attempting to ensure that future development on the emporium site will be appropriate to the area, in scale and not all commercial. We hope that other considerations and interests do not trump this intention. It is appreciated that City planners are attempting to ensure that future development on the emporium site will be appropriate to the area, in scale and not all commercial. We hope that other considerations and interests do not trump this intention.	SDF/EMF	Site Specific	Noted.
	S_138.1.3: Our response now (August 2022): Despite the City's response above, we note that in Guideline 6 of the Bishops court- Constantia-Tokai section of the May 2022 draft of the Southern District Spatial Development Framework (SDSDF) it is now recommended that no more than two storeys higher than neighbouring properties be allowed. Although this is still high, the attempt at limitation is appreciated.	SDF/EMF	Urban Development	Noted
	S_138.2.1: Our response now (August 2022): This is appreciated. Also please note that there are sometimes grammatical/spelling/typing slips and word omissions in the City's precis of the public's comments and the City's responses thereto, which make it difficult to discern what is meant.	SDF/EMF	General / Other	Noted. This was an unfortunate problem with the 2021 comments & responses report and hopefully is largely being averted in this report.
	S_138.2.2: BRG comment: Potential low-intensification urban overlay zones' are mentioned - including for Doordrift Road. It is difficult to understand whether the overlay zone would prevent intensification or promote it City's response: Noted. Potential overlay zones could make provisions towards achieving either. The draft SDSDF needs to be clearer in this regard where mention is made of such overlays being introduced. Our response now (August 2022): This would be appreciated.	SDF/EMF	Residential	The development guidelines try not to be too specific - so as to allow for contextual fit to a wide range of circumstances. But essentially what is being recommended is that these primary linking routes form urban nodes in Constantia to the Main Road should be considered for slightly higher densification than the more internalised residential areas behind these. This is to support at least some densification in support of public transport, improved NMT, enhanced urban form, and allowing for potential low impact business practices (eg. professional services) to be appropriately located in the wider area.

S_138.2.2 BRG comment: If Constantia plan is to be repealed the essence of it needs to be maintained to ensure the area doesn't lose its unique attractive qualities, built form, etc. one size fits all approach will not work City's response: It is presumed this refers to the Constantia Triangle local area policy. It is agreed that the local area character should not be unduly negatively affected, and should ideally actually be enhanced into the future. Our response now (August 2022): This is appreciated, however the nub is: Who decides what 'unduly negative' would consist of? (Yes, we were referring to the Constantia Triangle Local Structure Plan.)	SDF/EMF	New Dev. Areas	Noted. Who decides what is 'unduly negative' built form is a collective of many players, including communities themselves, officials, external professional planners (on the MPT), and political representatives.
S138.2.3 (transport) BRG comment: Request not to remove historic road schemes such as Doordrift Road, Constantia in order to preserve large, attractive, leafy trees along this route as it is so valuable (as the City points out elsewhere) as a carbon sink and a source of shade in these times of global warming. City's response: Removal of a road scheme will not result here in the road reserve width being reduced in future. On the contrary, removal of this and many other schemes elsewhere is rather to remove long term plans for further road widening etc which is no longer considered appropriate or feasible. The draft DSDF guidelines confirm (more strongly than the current approved district SDF) that tree coverage, vegetative interfaces on scenic routes etc are most important to retaining and enhancing future character in areas such as this. Our response now (August 2022): This assurance re tree and vegetation coverage is appreciated, however does anybody in the City know what is actually happening 'on the ground'? In our area someone was given permission for a second dwelling on condition that removed trees were replaced, such trees even being drawn and their botanical names given on the approved plans. No trees or shrubs were replaced and our queries in this regard were ignored.	SDF/EMF	Transport and Route Desgn.	Noted. Removal of road schemes is not universal. However, road schemes generally related to either planned future routes or planned future road widening (which may be the case here) - in which case it may indeed not be a bad idea to see this withdrawn. However, withdrawal in this area is unlikely, and would in any event follow due process (advertising for comment etc.).
S_138.2.3 (environmental) BRG comment: Exclusion of various Environmental and Heritage areas from triggers for protective action should be approached with great care. These are of great value for tourism and recreation and should be preserved City's response: This has been a detailed exercise done by planners & environmental & heritage departments of the city. Intention is to identify sites with little or no environmental & heritage significance. Our response now (August 2022): Again, who decides what "little or no environmental and heritage significance" means?	SDF/EMF	Environment	This is being approached with great care - to the extent that very few 'exemption' areas have to date been agreed upon (limited largely to Atlantis area at this stage). This will however be an on-going objective over the next 10 years in prep for the next revised District Plans.
S138.2.4 (environmental) BRG comment: Promote a water sensitive City' - but City approves residential developments that leave no open space increasing run-off and preventing water to soak-down and replenish aquifer- see three-unit development currently approaching completion on Kirstenbosch Drive City's response: Noted. This is however an important consideration in future development of urban areas generally (the Catchment Management dept comments on all development applications where relevant) and the Liesbeeck River catchment in particular (due to its history of flooding). Our response now (August 2022): Well, lip service was only applied in the case of this Kirstenbosch Drive project. Is there no oversight, are there no building inspectors anymore?	SDF/EMF	Transport and Route Desgn.	Disagree. This development was very carefully considered in its context and inordinate time spent on reaching an optimal outcome. This requires very careful consideration in the context of an urban area and with a growing city. It has to be noted that the city is still generally a very low density urban area and thus extremely inefficient by world standards re- urban functioning, services provision, viable public transport etc.
S_138.2.4 (environmental) BRG comment: city encourages Biodiversity conservation' but proposes to cut down half of Nirvana Park . Constantia fits the definition of a "special Place" and should be dealt with as such. City's response: (see response for S_5) Our response now (August 2022): Again we say: It is nevertheless a strange move to reduce Public Open Space at precisely the same time as promoting densification, increasing the number of dwellings on any erf here from one to at least three. Houses lose their gardens, but the park is reduced in size.	SDF/EMF	Environment	Noted. Please see response above to an earlier comment made in relation to this park.

S138.2.5 (mapping) BRG comment: The map and its legend on page 110 are too low-resolution to be useful City's response: noted Our response now (August 2022): A better resolution map would be appreciated.	Mapping	General / Other	A better resolution set of mapping will follow with approval of the final draft report. The intention is to include public access to 'zoomable' interactive maps.
S_138.3.1 SDF Technical report intro BRG comment: In the heading 1.2 there seems to be a word missing. City's response: Noted, and will address. Our response now (August 2022): This would be appreciated.	SDF/EMF	General / Other	Has been addressed.
S_138.3.2 BRG comment: Site-specific circumstance'- his term has allowed inappropriate developments to be approved (bmw workshop in Constantia)- an oversight mechanism is required. Similarly the checker development is inappropriate development in a destination place and along scenic route. City's response: The DSDF cannot address this issue as it is not within the mandate of policy. Our response now (August 2022): All the work put into a policy such as this would be futile if decision-making bodies continually default to their interpretation of 'site-specific circumstances'.	SDF/EMF	General / Other	All parts of the city, irrespective, are and will be subject to future development, densification, and re-development. This is made clear in the range of policies approved, past approved, & to be approved now. This does not mean a 'one size fits all'. But all areas, including Constantia, have always been in a state of dynamic flux. Constantia after all was once just farms (with few trees, and little residential). But sensitive future development in an urban context is required, which in recent times has largely been the case, and certainly in Constantia relative to other areas.
S_138.4.1 (Subdistrict 2 constantia) BRG comment summary: agree with the first point of the vision but encourages caution re second point ('intensifying development, increasing the range of living experiences and economic opportunities') also the statement "enhancing public space" is contradicted by the proposal to develop nirvana park. City's response: noted. (see response for S_5) Our response now (August 2022): The City's response is appreciated, as are the attempts in the Guidelines of the Bishopscourt-Constantia-Tokai section of the May 2022 draft of the SDSDF to recommend "integration with surrounding residential areas" and "respect for surrounding area, good design, visual impact".	SDF/EMF	Site Specific	Noted. The constructive format of these comment inputs by this Barbarossa group is appreciated.
S_138.4.2 (Subdistrict 2 Supporting dev guidelines) BRG comment summary: Points 1, 2 and 3 are endorsed. Point 4 should actually be two points (economic activities; and finer-grain residential, related to this who decides if an activity is 'low-impact', 'small-scale', low-impact subdivision'? Point 6 is confusing & worded incorrectly City's response: Noted, and been reviewed. Our response now (August 2022): This would be appreciated. Sometimes the text's intention seems entirely obvious to the planner-author, but is actually ambiguous, which could be dangerous.	SDF/EMF	Site Specific	This has been reviewed again.

S_138.4.3 BRG comment summary: Point 6 ii (a) - the omission of any safeguards for residential erven within 400 m of "existing commercial nodes/precincts" leaves these areas open to serious degradation. There should also be limits to the numbers of parts into which these erven can be sub-divided, and strictures should be placed on how many dwellings can be built on what was previously one SR1 erf with a minimum size of 1350 m². City's response: The SDF proposals will have to be considered (in law) also to the MPBL's DMS (Development Management Scheme). The basic premise is that urban areas need to become more liveable, walkable etc. and hence the SDF proposals (which are in line with international best practice. Evidence is that these development outcomes (.....sentence just tails off What is left out?) Our response now (August 2022): Care should be taken that an 'anything goes' attitude is not adopted with regard to residential areas within this 400 m radius; an attitude of 'let's protect the so-called Arcadian Zone and stuff as much as we can into these other areas' would be inappropriate.	SDF/EMF	New Dev. Areas	It is a continuing challenge with planning policy as to how prescriptive to be in development guidance. In most cases there is an overlapping range of development guidance across a number of different policies for any one area - including this Constantia 'node' area (eg. District Plan, Boundary walls & fences policy, scenic drives policy & others). This is in addition to the provisions of the MPBLs DMS. Assessment of new development proposals remains nevertheless quite subjective - but it is a case of finding the right balance between being too loose and too prescriptive, and also achieving consistency in application across all different parts of the city and specific local areas. The current draft District Plan is hopefully the correct balance.
S_138.4.4 BRG comment summary: Point 6 ii (b) the maximum built coverages do not seem to match those given in 'Table A: Summary of the zonings and development rules' on page 95 of the current Municipal Planning By-law and are thus confusing. Also, if sub-division of erven is contemplated, point 6 ii (b) does not make any provision for erven smaller than 1000 m² - which could be resultant sizes when erven are sub-divided. City's response: Minimum erf size overlays in the MPBL are now ± 50 years old and thus extremely dated. Spatial policy needs to reflect changing realities and imperatives, and inform future changes in the MPBL. The fact is (internationally and locally) that densification around CBD-type areas has led to massive enhancements to living and lifestyle (e.g. City bowl; Greenpoint; Claremont; Constantia village). Our response now (August 2022): Our question has still not been answered. The May 2022 draft still does not give any maximum built coverage for erven below 1000 m². Our question is a fair one, such information is necessary. The May 2022 draft merely says: "8. ii.b. Maximum (built) coverage (including paved area such as driveways, parking, and entertainment areas) should be 50% on erven 1000-2000m² and 30% or 1000m² (whichever is greater) on erven >2000m². "	SDF/EMF	Urban Development	Noted. However, areas <1000m² are not also addressed as these erven are less of a problem in this respect, and this issue is largely addressed through the MPBLs DMS provisions.
S_138.4.5 BRG comment summary: Permitting unfettered densification within 400 m of a "commercial node/precinct" could lead to unmanageable scenarios. For example, it would be ridiculous to sub-divide a 1350 m² erf even once - and then allow: a main dwelling, a second dwelling and then a third dwelling on each half of the now sub-divided erf. This would total six dwellings on what was previously a one-dwelling erf- this will lead to many negative outcomes City's response: See responses to comments in sections s_138.4.3 and s_138.4.4 above. Our response now (August 2022): Simply referring us to those sections does not answer the concerns, nor give any assurance or planning guidance for the future. Erven could simply be subdivided and subdivided exponentially, 'breeding like rabbits'.	SDF/EMF	Urban Development	The development guidelines do refer to application being appropriate to context. Thus application on a scenic route within the same area might need to be different to the approach on a route that is not. The proposed development guidelines do not remove the necessity for decision-makers to apply their minds to each potential application on a case by case basis. However, in these instances the intent is to support more walkable communities, and within 400m (5 min walk) of urban nodes makes sense. The guidance should /does not allow for unfettered development scenarios resulting.

S_138.4.6 BRG comment summary: Point 8. In this paragraph "retirement villages" are mentioned and we ask that this section of the market be catered for. section 3.5.1 of this Technical Report, it's suggested that between 2020 and 2040 the percentage of the population aged 65 years and more is expected to almost double. City's response: Noted. This is addressed in certain sub-district areas - but will be reviewed to see whether improvements / additions are necessary in other sub-districts - or whether a general district-wide development guideline/s is required. Our response now (August 2022): An attempt at a district-wide assessment would be valuable. This is a growing demographic segment.	SDF/EMF	Residential	This is a valid point. The general district-wide guidance does speak to the need to cater for a wider range of residential needs and demands. This is to be revised to be rather more specific, although it can not try and explicitly identify all cases.
S_138.4.7 BRG comment summary: Point 10. Here "open space improvements" is mentioned, a statement at odds with the Nirvana Park proposal on page 80, which seeks to halve a park, not improve it. City's response: (see response for S_5) Our response now (August 2022): See our responses above. It seems unnecessary to cut down a park that is actually safe and well-used, in these dangerous times.	SDF/EMF	New Dev. Areas	Noted. This has been reviewed and amended. See also other response to this issue elsewhere above.
S_138.4.8 BRG comment summary: Point 11 - How can this intention be upheld when the proposed BMW motor workshop & Checkers has recently been approved to be placed right up on the M3 scenic drive. City's response: The draft DSDF must be formulated despite past decision-making elsewhere in the city. It is the view that this guidance should still be included in the new draft DSDF despite this situation - as a means to guide future development proposals in the area. Our response now (August 2022): We appreciate the frustration planners must experience when considered intentions are over-ridden by questionable 'site-specific circumstances' and other non-planning considerations.	SDF/EMF	New Dev. Areas	Noted. The intent of planning policy is to reduce as far as possible differences of opinion concerning potential future development on any one site, but being mindful that there will never be unanimous agreement on all issues.
S_138.4.9 BRG comment summary: Point 17. This is a repetition, word for word, of point 8. City's response: Noted, and this will be amended. Our response now (August 2022): Such tidying-up and proofreading are appreciated.	SDF/EMF	General / Other	Noted.
S_138.5.1 Subdistrict NDAs- SA Riding School BRG comment summary: There seems to be no change from the provisos in the 2012 TR. Has this site not since been ear-marked as a land restitution site in favour of the Sarden family? City's response: Not that this dept is aware. Our response now (August 2022): Updated information would be appreciated.	SDF/EMF	Environment	Investigation thus far has not revealed that this is a restitution site (despite numerous rumours that it is). It may be that this is a matter still under consideration (given that these matters invariably are very lengthy processes).

S_138.5.2 BRG comment summary: Nirvana Park Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area, will have many negative impacts City's response: (see response for S_5) Our response now (August 2022): We see that specific listing of the Nirvana Park site has now been excised from the latest draft. However we do notice that the following paragraph has been added to the Guidelines for the Bishopscourt-Constantia-Tokai section of the May 2022 draft: "13. In addition to the inclusion of restitution claimants, investigate opportunities for some more-affordable ('inclusionary') housing within the area. Potential sites include identified NDAs, other smaller state-owned sites within the residential area, and possibly small parts of under-utilised or un-connected open space areas in welllocated areas where some development could improve the area re- improved development interfaces, over-looking surveillance, etc. ..." Thus the option for developing on Nirvana Park is still included.	SDF/EMF	Transport and Route Design.	This is not correct, certainly in as much it is no more so than any other open space in the area. However, the development guidance is clear that 1) this should (at this stage merely) be investigated, 2) it should only comprise a small part of any site, and 3) only where appropriate and where it could actually enhance the open space re- dead spaces, surveillance etc. the fact remains however that in Constantia restorative justice just cannot be ignored given the history of location of this area. This will be a continuing dialogue in coming years, and all inputs are welcome.
S_138.5.3 Constantia corner Ladies Mile Spaanschemat River Road Site: erf 16-4724- rem and erf 14038. BRG comment summary: supporting guidelines very confusing and needs to be reworded. Does the one refer to the already partially developed section, and the other to the completely undeveloped section? The point 2 paragraph is particularly confusing. What does "align with this area" mean? Which area? The already partially developed section? The rest of the points are endorsed and will hopefully be upheld. City's response: Noted. See reviewed development guidance for this site/area - which now is hopefully clearer and unambiguous. Our response now (August 2022): The City's attempts to clarify the Land-use Guidelines are appreciated. We note you have retained the need for "appropriate land uses, good urban design, visual impact, positive edge interfaces, and landscaping." Regarding the repeated statement "Notwithstanding some development already existing on the site (re- the 'Emporium') an integrated SDP for the entire area is desirable" we feel that "desirable" is not strong enough, and something like "mandatory" or "essential" might be more productive. We appreciate the City's inclusion of the following element to the description of the site: "gateway site into Constantia bounded by scenic routes"	SDF/EMF	Site Specific	Noted. And comment appreciated.
S_138.5.4 Firgrove BRG comment summary: additional suggestions: • Some inclusionary housing can also be incorporated here; A school could be integrated on this large site City's response: Noted, and broadly agreed with, although the details will emerge in the actual development process. Our response now (August 2022): Thanks for response. (We note from Mr Cronwright's comments that this site is also being looked at by land restitution groups.)	SDF/EMF	Site Specific	Noted.

S_138.5.5 Missing NDAs as per 2012 Plan BRG comment summary: Strawberry Lane, Erf 16-3110, Size 3,5 ha. This is zoned educational. In the 2012 Technical Report it was included and designated as "mix of medium and low density housing". Figure 7 of this 2020 Technical Report indicates it as Potential Medium Density Development, but it is not included in the New Development Areas section. Why? City's response: Noted. This is an omission and has been rectified. Our response now (August 2022): The re-inclusion of the Strawberry Lane site is appreciated. The following point in its Supporting Land-use Guidelines might also be very usefully applied to the Constantia corner Ladies Mile Spaanschemat River Road 'emporium' Site": "2. Development should create a positive interface with the roads and integrate with surrounding areas by being of low density around all edges and 'fronting' onto the roads."	SDF/EMF	New Dev. Areas	Noted. And the recommendation for inclusion for the 'Emporium' site is considered useful and has been duly incorporated.
S_138.5.6 BRG comment summary: Sweet Valley - Soetvlei Avenue, Erf 16-3331, Size 4,7 ha. This is zoned "government (educational?)". Does nobody know? In the 2012 Technical Report it was included and designated as "Residential infill and possibly educational use", as well as "The most appropriate future use of this site should include a mix of medium and low density housing." This site should be mentioned in this latest TR. Why is it no longer there? City's response: Noted. This was an omission and has been addressed in the revised final SDF. Our response now (August 2022): The re-inclusion of the Soetvlei Avenue site is appreciated. The suggestion of educational use is a positive one as there is a need for more provision of schools in the area. Schools have been long-promised, but not delivered.	SDF/EMF	Site Specific	Noted. The comment's attention to detail is appreciated.
S_138.5.7 BRG comment summary: Rathfelder Park - Erf 2933 In the Technical Annexures document, a table on page 44 indicates that Rathfelder Street (Rathfelder Park, presumably), as it is listed as being "large city owned Open Space (sic) zoned property in Constantia. Currently used as park and recreational site. 20% developable land. Pausity (sic) of state owned land for affordable housing. Potential restitution site." This piece of land should also be mentioned in this latest TR. Why is it not there? City's response: Noted. This is not included explicitly as an NDA site in the final draft SDF. However, it should nevertheless be considered as a (one of a number of) potential public open space areas where a small (or very small) portion could in future be considered for additional housing stock which helps to address the historical imbalance of housing opportunities in the large area associated with past inequities in terms of area-based living policies and actions. Our response now (August 2022): Rathfelder Park has still not been included in the May 2022 draft. It should be included.	SDF/EMF	New Dev. Areas	Disagree. This site carries the same significance and approach as adopted for Nirvana Park. It was decided that it was injudicious to include the latter as an NDA (albeit that it is very well located in the urban node). The same applies here to the former.
SECTION C: General comments on May 2022 draft of Sub-district 2: Bishopscourt – Constantia – Tokai Refer to Southern vol. 2 Draft Technical Report – May 2022	SDF/EMF		see below

	Re: Supporting Development Guidelines In comment S_159.6, the commentator Cronwright seems to be suggesting including Spaanschemat River Road in Development Guideline 4 (of the 2021 draft). We object, as non-residential use here would be highly disruptive to both the inner fabric of this residential area as well as traffic flow, as these homes face inwards away from Spaanschemat River Road. Similarly the content of point 6 (of the May 2022 draft) would be inappropriate on this part of Spaanschemat River Road as access to such suggested intensified residential erven would not be available from Spaanschemat River Road and would put an unbearable strain on the residential fabric within, with its narrower streets and cul-de-sac nature. As regards point 7 (of the May 2022 draft), we point out that "small-scale, low-impact" subdivision is not possible without strict conditions restricting the number of potential resultant dwellings to that previously allowed on the erf before subdivision. As regards point 8 ii (b) (of the May 2022 draft), there is still no mention of the maximum built coverage for resultant erven below 1000 m2. See our 2022 comments on S_138.4.4. In point 8 ii (c) there is mention of retaining trees on sites to be further developed – but we ask, is this only for "parts" of Constantia? Why not the whole area? We have observed that the relevant 'greenness' expert in the Planning Department tries to include retention/replacement of trees and shrubs as a proviso for approval of plans, so why does this ambiguity/vagueness/potential for misunderstanding exist here? In point 12, housing the elderly in "most particularly already identified restitution sites" is welcomed.	SDF/EMF	Urban Development	Noted. This has been reviewed again, and minor amendments made where felt necessary and appropriate, however this dept believes that on the whole these concerns and issues have been appropriately addressed.
	SECTION C: Further comments and questions from the Barbarossa Residents' Group: Intensification alone is fraught with incipient problems, but diversification truly holds the potential to destroy residential amenities. It should be approached with great caution. (See our comments regarding 'dead at night' results, let alone increased traffic, parking problems, noise, crime and grime.)	SDF/EMF	Site Specific	Diversification (of different types of development) is generally recommended only for designated MUI (mixed use intensification) areas - & these are strongly controlled. The only exception to this, and in an effort to support economic development in an appropriate manner, is to id areas where lower order business activity, limited to uses compatible with residential activity, is proposed - & even then only to very specific areas. These being in existing business areas within residential areas (existing offices etc) or on parts of main through routes where and as appropriate. So these recommendations come with retractive development guidance so as to ensure appropriateness to context & support economic activity.
	In the March 2021 draft of this District Spatial Development Framework the Porter Estate land was mentioned. It has now been removed? Why is this? Is it because it is outside the Urban Edge?	SDF/EMF	Site Specific	Correct
104	Endorse Sunnysdale Ratepayers Association Comment on SDF.	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
105	Objection to the proposed development for Fish Hoek Sports field	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Succesful precedent exists for this in the city.

106	Recommendations from ZRA 1. The ZRA supports SDF principles to recognise the unique character of the Constantia valley, including Tokai and specifically Zwaanswyk. 2. Supports the development of the greenbelt network, incorporating the historic use of these trails by horse-riders. 3. Recommends that the SDF provides overt recognition of the equestrian land use and historic character of Zwaanswyk, particularly the core equestrian area, as one of its "Arcadian zones". 4. In support of the "core unique character" of Zwaanswyk, calls for a halt to further subdivision of erf's to less than 4000 sqm to preserve their equestrian potential. 5. Urges a much closer consideration of approval of building plans under the Sectional Title carve-up of single residential erf's within the core equestrian area. The proposed guidelines regarding built coverage, tree canopy retention etc. of these properties should, at the very least, be in line with the original zoning of the properties. 6. Urges that the City recognises the way in which the Sectional Title Act undermines, or totally negates, the principles of this SDF and the ability of municipal planners to guide appropriate development, and lobbies national government to amend the Act to give the City a more meaningful role in deciding whether a Sectional Title is desirable for a particular property.	SDF/EMF	Environment	A number of these concerns are either covered by the provisions of the MPBL (re- the DMS) and so outside the scope of this policy report. However, the draft District Plan does now overtly and explicitly acknowledge the importance of the equestrian activities and economy, and does include an associated broad development guideline in relation to this. Further work is required to refine this matter in the coming years.
107	Densification Wynberg - As a ratepayer I have not been aware of any public process before that has made the general public aware of the transition from its historic urban character to the higher density implications and these are quite significant. 1. The Role and Responsibility of Council : What are the relevant statutes that would ensure that the authorities proactively guide and manage this sensitive transition ? 2. Public Amenity : With the increased rates the Council has already derived a higher income from the area and as this process unfolds the financial returns accruing to the local authorities will increase accordingly, what then are the quid pro quo returns to the Public Areas and general amenity of lower Wynberg ? Safety Security and Cleanliness is high priority in public spaces. The anti- social behaviour in children's parks eg Vine Road Park and neglect of vacant lots such as the Railway property on Castletown Road are just an example. 3. Urban Design: " Housing " (A Comparative Evaluation of Urbanism in Cape Town) by Dewar, Uytendogaard) featured samples of the traditional characteristic of lower Wynberg, particularly the integration of public and private spaces i.e. the public street the semi-private stoeps then the privacy of the home itself. The historic urban fabric is being replaced by buildings on stilts providing undercover parking as the impersonal public interface. Appropriate urban design principles are essential to meet the changing demands which slips into vehicular dominance at the expense of social interaction. Lowering parking garage, landscaping boundary walls and adding balconies which replaces the stoeps encourages social interaction and surveillance of the streets..... "The Eyes on the Streets" a quote from Jane Jacobs the internationally renown Urban Planner which contributes to security. 4. Architectural Features : The current examples are bland and uninspiring. They appear to purely satisfy the minimal zoning requirements. Architectural guidelines are needed to encourage good building design. Contrasting relief as opposed to flat facades, balconies and recesses with sun shielding devices would provide much needed character to the buildings. Some form of Urban Design and architectural vetting needs to be applied. 5. Sustainable Building design: This is an essential requirement, again not apparent in the precedent examples mentioned above.	SDF/EMF	Residential	There have been numerous public processes over the years (on a number of different projects) that have addressed this issue through their respective engagement processes. Wynber has long been identified as a targetted area for densification - going back to the MSDP approved in 1996 which include the Wynberg-Claremont area as one of 4 Metro urban nodes (along with the city bowl CBD, Philippi, & Bellville). There are many policies approved, as well as the provisions of the MPBL, which aim to ensure that the authorities proactively guide & manage sensitive densification transtion. The City has already been gearing up for improvements to public spaces and places in Wynberg. Improvements to Maynardville is a case, as is the creation of a CID. All major new public projects for Wynberg (including the PTI and MyCiti, & couplet road) have public realm improvements as key parts of their planning. Future private sector development response needs to ensure appropriateness within the context of an historical heritage area, and whilst there have been some less than desirable developments approved, it is incumbent on all players involved in decision-making (including communities, officials, & politicians) to ensure appropriate developments in future in an area which is targetted for future densification due to its great opportunities.
108	Endorse Sunnysdale Ratepayers Association Comment on SDF	SDF/EMF	Urban Development	Noted. Please see responses to these issues elsewhere in response to the SRA.
109	2. Westlake Golf Club (WGC): a. Facing the current challenges: i. WGC, like many golf clubs and other sport and recreational clubs and organisations, over the past years has experienced a decline in membership. For those whose livelihoods are at risk in a struggling economy, sport and recreation has become an unaffordable luxury and many memberships at sports clubs are not being renewed. The above impacts on the club's sustainability. ii. It is important for any business to continually innovate, reinvent and reposition itself to stay relevant and, more importantly, to stay in business. WGC has reached that point.	SDF/EMF	General / Other	Noted.

	b. Development proposal: i. It is proposed to rebuild the clubhouse to incorporate revenue-generating uses, including conference facilities, a bar and restaurant. This revenue will assist in securing the financial wellbeing of the club, whilst offering high quality services and facilities to existing members. ii. New residential buildings (to cater for the current demand in particularly retirement housing). This building will provide an annuity income to support the club's existing revenue stream. iii. To ensure long-term water sustainability various options are being considered to enhance the water storage facilities over and above the main irrigation dam,. In addition, an effective greywater recycling system will provide additional water to complement the current water supply. iv. The above opportunity provides a business model that will help to sustain the club as a lively, thriving, active and social golf club, with sufficient secure water storage to maintain a beautiful and well-kept course.	SDF/EMF	New Dev. Areas	This is detail beyond the scope of this planning policy guidance report. These proposals would need to be submitted, discussed, and evaluated against inter alia applicable planning policy directives. In principle activities / land uses compatible with and supportive of the sport or recreational activity is supported. In broad terms bars & restaurants are likely to meet these criteria, but not residential development. Support for the latter would likely require deviation from policy and be reliant on well motivated reasons based on a sensitive logical compelling rationale.
	c. Important considerations: i. During the detail design process, special attention will be given to limit all potentially negative impacts on the surrounding environment and residents, specifically with regard to traffic and views, particularly from Stonehurst Mountain Estate opposite. ii. In terms of the latter, considerations will include building heights, landscaping, retaining existing trees and the sensitive street interface adjacent to Westlake Drive as an important transport route. Very importantly, retaining the special "Westlake Identity" is an overriding consideration and will be ensured. iii. It should be noted that services infrastructure capacity availability was confirmed by the City of Cape Town for the envisaged development. iv. The desirability and compatibility of the proposed development with regard to impact on the surrounding area, environment, services, traffic etc have been considered and will be addressed in detail in the relevant land use application to follow.	SDF/EMF	Urban Development	Noted.
	c. Given the above inputs, it is proposed that the SDF enable sport and recreational clubs and organisations to explore value adding opportunities to ensure the long term sustainability of these community facilities to the benefit of the larger area and community. These opportunities could also contribute to the stimulation of economic growth, an improved mix of uses and reduction of travel distances and trips.	SDF/EMF	New Dev. Areas	See response above. This proposal is potentially problematic re- opening the door to undesirable future uses on such land - as well as setting precedent for similar arguments and expected outcomes on similar (or all) private open space or sports land.
110	(Many) Detailed comments on Vol 2 Technical report (see submitted comments document).	SDF/EMF	New Dev. Areas	Comments either addressed below, incorporated into the draft District Plan, or disregarded (see below). A number of comments valuable observations or recommendations re- proposed amendments & duly incorporated. A number of suggested detailed inclusions, whilst not disagreed with, have not been considered for inclusion into the draft District plan since they are either too detailed (in relation to the scope & detail of a district scale plan, or they add unnecessary additional bulk to an already lengthy report.
	The CRRA consider appropriate development to be according to proposed Constantia Local Area Spatial Development Framework Figure 34 which is attached as Annexure 1 to this submission.	SDF/EMF	New Dev. Areas	Disagree. This would imply that the draft District Plan is effectively incorporating all guidance of the proposed Constantia Local Area Spatial Development Framework. This is not the case. Certain guidance has been incorporated as & where considered appropriate, but much is not agreed with. Importantly in this respect this proposed report has been through no formal consultation process and has not been 'bought into' by all I&APs within Constantia area.

	Suggested amendments to 'Arcadian zone' related guidelines.	SDF/EMF	New Dev. Areas	The term 'Arcadian zone' has, based on other comments received, been withdrawn as considered dated, colonial-rooted, as well as generally unnecessary as development intent and guidance included is sufficiently clear. Notwithstanding this, where considered appropriate detailed amendments to guidelines text has been made in response to comment recommendations.
	Objection to proposed market gardening in greenbelt areas specifically.	SDF/EMF	New Dev. Areas	It is believed that the proposed development guidelines in guideline 9 adequately address this concern.
111	Inclusion of HPOZ for Wynberg East This area has been a proposed HPOZ for over 40 years Our request @ Mr Hart, is that the area from Park Road until South Road, also be assessed and included as part of the declared area	SDF/EMF	Environment	This is a matter outside the scope of this policy formulation - as this draft policy is reliant on info in regard to HPOZs being fed through to this policy - so is to be dealt with by the Env Management Dept (who have been notified).
112	Objection to proposed development on Fish Hoek sportsfield	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsidising alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Successful precedent exists for this in the city.
113	Volume 2: Draft Technical report Specific comments: Table 5: Environmental planning categories and associated guidelines (pg. 31). Conservation and Biodiversity Priority Zone Biodiversity, Protected and Conserved areas (Core 1) 'Table Mountain and environs' should be replaced with 'Table Mountain National Park'.	SDF/EMF	Environment	This has been amended.
	On page 34, it is noted that the 'Table Mountain chain' is listed under Culture and Heritage Resources – Map 3. However, please note that the Cape Floral Region Protected Areas World Heritage Site (CFRPAWHS), of which TMNP is a component part, is inscribed as a 'natural' WHS in terms of UNESCO's criteria for Outstanding Universal Value (OUV). The specific OUV criteria are ix) ecological processes and x) biodiversity.	SDF/EMF	Environment	This section has been amended.
	Figure 12: Cultural & Heritage Resources (pg. 37) needs to be corrected as the Tokai plantation areas do not form part of the Constantia Winelands Cultural Landscape – this is an inappropriate designation as the commercial plantations / State Forests have been phased out in terms of national government decision and have been incorporated into the Table Mountain National Park and form core areas of the Cape Floral Region Protected Areas World Heritage Site (CFRPAWHS) as these areas comprise 'endangered' and 'critically endangered' fynbos vegetation.	SDF/EMF	Environment	(Comment from EMD Heritage Branch): Disagree. The Constantia Winelands Cultural landscape includes the mountain backdrop as part of the setting and is not limited to land which is transformed i.e. the areas incorporated into the TMNP would still form part of the cultural landscape
	3.3.6 Destination places (pg. 60) Please note that (Boulders) Penguin colony, Cape Point, Old Zoo (& Rhodes Memorial) are located within TMNP and managed according to the approved Park Management Plan (PMP) and Conservation Development Framework (CDF).	SDF/EMF	Environment	This section has been amended.
	Sub-district 2: Bishopscourt – Constantia – Tokai (pg. 75) Under the heading 'Supporting development guidelines (how and where?)' for 'Constantia – Tokai specific' should include a provision which reflects national Government's decision to phase out the Tokai plantation and for the restoration of the critically endangered Cape Flats Sand Fynbos in Tokai section of TMNP.	Implementation Plan	Environment	This is not something to include in 'Development guidelines' (as we don't envisage any dev here). This is really an environmental implementation issue (for the respective dept to address). This can however be included in the Implementation report.

	'Far South' sub-district: New Development Areas, 3. Masiphumelele (pg. 101); Erf 5131: Size: approx. ±5.2ha Reference should also be made to the proposed Houmoed Road extensions and the associated high density residential infill development on the City owned 'reedbed' wetland properties.	SDF/EMF	Development Edges / STAs	This is a particularly sensitive matter - as the future urban edge line delineation in this area has (& effectively can) not yet be determined. Nevertheless the comment is noted and the report amended to better reflect at least the development intent for this area re- the proposed Houmoed Road extension.
	10. Imhoff's Gift (pg. 102); Erf 948-32: Size: 47.9 ha SANParks supports the intention to establish the 'Protea Ridge corridor' linkage and is actively working with the landowner to achieve this.	SDF/EMF	Site Specific	Noted.
	11. Ocean View (pg. 103); Erf 1544 et al Reference should be made to CF 948/9 adjacent to Oceanview and the consultation between the community, the City and SANParks to accommodate the Rasta community (Solomon Square).	SDF/EMF	Development Edges / STAs	This is a particularly sensitive matter - as the future urban edge line delineation in this area has (& effectively can) not yet be determined. As such the Rasta community issue needs resolution outside of the development guidance associated with this policy.
	4.5 Sub-District 5: The Table Mountain National Park and Environs Figure 19: Table Mountain National Park and Environs sub-district	SDF/EMF	General / Other	Noted, and to be amended.
	Volume 3: Implementation Plan Please note that no page numbers are provided in this report. 1.2.1.a New Road Links v. Fish Hoek by-pass – this proposed route impacts the TMNP and is not supported. vi. Houmoed Avenue by-pass – the by-pass is supported as it provides for additional land for low income housing and provides a hard defensible edge to the Park. vii. Hout Bay by-pass – this proposed route impacts the TMNP and is not supported. 1.2.1.b Road upgrades i. Kommetjie Main Road - In planning the Kommetjie Rd upgrade, cognisance needs to be taken of the proposed Protea Ridge ecological corridor linking the Noordhoek wetland section of the TMNP to Slangkop section.	Implementation Plan	New Dev. Areas	The Fish Hoek and Hout Bay bypasses remain as important future new road proposals towards realising the required, integrated, and optimal road network for the city in this area. However, taking note of this comment, these routes will require very careful consideration across multiple factors towards appropriate implementation outcomes.
	1.2.1.d Non-motorised transport: Improve cycling linkages and access between City NMT cycling routes and Park designated cycling/MTB routes as set out in the TMNP Cycling and MTB Environmental Management Programme (EMP).	Implementation Plan	New Dev. Areas	This is, beyond a broad supporting statement of intent included in the District Plan, an implementation matter and belongs in the Implementation report - and duly included therein.
	Volume 4: Annexures 1.2.3.a Site for Investigation and 1.2.3.c Informal Settlement Upgrade: The Oceanview Rasta community (Solomon Square) on CF948/9 should be considered as a site under investigation for upgrade.	SDF/EMF	Site Specific	Noted, but see response above in respect of this area.
114	Objection to designation in MSDf as 'Critical Natural Asset' and by the Southern DSDf as 'Core Biodiversity'. City approved rezoning & subdiv in 2012 (28 properties) & an extension of validity approved in 2019. Thus approval consistent with 'urban development'.	SDF/EMF	Site Specific	Noted, & agreed with entirely. The designation in previous drafts advertised were incorrect & an oversight. This should have been amended earlier, but has still to be done. Urgent amendment to designations required.
115	1. District Southern – Greater Steenberg Valley (including Constantia) 1.1 MAP, HERITAGE CONSERVATION AREAS AND CULTURAL LANDSCAPES, 1/11	SDF/EMF	Site Specific	
	1.1.1 that the TMNP is since 2005 part of the World Heritage (WH) Site: NATURAL under Criteria (ix) and (x) of the 2004 declared Cape Floral Region Protected Areas AS WELL AS Protected Area according to local Laws (National Environmental Management Act: Protected Areas (NEMA:PAA), Act 57 of 2003 and as Amended; the 1989 Environment Conservation Act, Act 73 of 1989 and internationally the 1994 IUNC Convention.	SDF/EMF	Environment	Noted.

	1.1.2 Buffer Areas: that there is a group of people in the Constantia and Tokai area who (erroneously) argue that the edge of the TMNP is a buffer area. The edge is a land-surveyor 'line' on paper and not an open space between TMNP land and the Constantia suburb. It seems further that this group would like to equalise the WH Status Category: Natural to an apparent mixed status of Cultural and Natural by taking advantage of cultural heritage based on often unsound history facts or very selective history material of the Constantia and actually the Greater Steenberg Valley, i.e. that the first wine was made on Constantia. It is rubbish as the first wine was made in the Tuine and on Jan van Riebeecks Farm on Wynberg- therefore the name of the hill: WYNBERG / Wine Mountain. The farm was set alight during the First Khoikhoi-DEIC War, 1659-1661. It was recorded as a model farm.	SDF/EMF	Environment	Noted.
	GIVEN the above the fynbos is indeed also a cultural marker but it is NATURE or the environment that is giving man the space to be culturally active. The World Heritage Status: Nature is supreme and dominant because of the WH Status of the natural and indigenous vegetation, where the wine-farming in the entire Valley, early architecture, slave history and labour communities on the wine-farms are cultural and neutral to the Natural and indigenous vegetation. In 2015 a proposed nomination of a vineyard next to Tokai Park was cancelled by the World Heritage Council on the basis that it didn't meet the Criteria: Natural based on the integrity of the heritage. Please take note. The MAP should be corrected and the CoCT should redress their EMF accordingly.	SDF/EMF	Environment	Noted. This will be reviewed to see if any amendment is required.
	3. Municipal Spatial Development Framework I find it ludicrous to combine Constantia Valley and Tokai with Bishopscourt in one suburb. Suburbs are not organised by wealth, or the size of the houses, the number of cars and the size of the properties, but by topography and based on historic suburban development. Cape Town is already an example of a very uneven society where the difference between the affluent people, the middle-class, lower middle-class, townships and shack communities are very visible. Why enhance this social divide further? Can all the people in the greater Steenberg Valley afford the tax of Bishopscourt? There are people living in Tokai for decades who will be forced to leave the area because of the unnatural merger. Relaxations of building regulations have already divided the community with regards to properties.	SDF/EMF	General / Other	The combined area referred to is merely the grouping of more generally similar areas (from a spatial planning perspective) to which reasonably similar development guidelines can be ascribed. This does not aim to increase ' the social divide' etc. but to approach each broad area uniquely - broadly in relation to access and opportunity but also character and other criterion.
	4. Environmental Management Framework I have alluded to several environmental issues from a heritage and history perspective in the above sections. There is no use to repeat the issues here but the EMF cannot happen without the acknowledgement of the natural and cultural heritage of the City of Cape Town. I also call on the CoCT to involve HWC, Cape Nature and possibly SANParks with regards to the recovery and restoration of the Buffelsvlei Wetland, now the Lion's Gate area. With the right guidance the area can be rehabilitated without replacing the people. The gums, piles of manure and ground have to be cleared and an alternative method to be found for storing manure and soil in a wetland. The opening up of a canal for the water to drain towards the Palmietvlei downstream can restore wetland utilization patterns of the past, although it is not necessarily ideal. The housing of the so-called Blue Gum Lane is a heritage and it was once the houses of the constables and warders of the Porter Prison where the Constantia Science and Maths School is today. Please pay attention to this area.	SDF/EMF	Environment	Noted, and generally agreed.

116	1. The mapping department (who drew up the maps for the SDSDF and EMF) does not have an accurate picture of the suburb of Sunnydale. I attach a boundary map (issued by the City mapping department) for clarity.	Mapping	Site Specific	The reference to contiguous areas have been reviewed and amended where inconsistency existed.
	Not once did I find Sunnydale represented on the maps. Most of the suburbs - Kommetjie, Noordhoek, Fish Hoek, Simon's Town, Ocean View etc are all recorded - most of them smaller than Sunnydale. Masiphumelele features on a number of the maps. It is incorrectly spelt for starters, is incorrectly positioned, and in one map is positioned across the commercial area of Longbeach and Sun Valley Malls and Sun Valley - nowhere near to Masiphumelele - Masiphumelele is most certainly not the district node. (E.g. One map is identified as: Southern Implementation 1 - "Urban and Restructuring and Upgrading Map" dated February 2022). Please will you ensure that your maps are accurately labelled and that the suburb of Sunnydale is clearly identified?	Mapping	Site Specific	Noted. However, not all areas can be referenced on the map.
	2. In some instances, there is contradicting information between maps and the text. Point 8 in Volume 2 on pages 101 and 102 clearly states that erf 17775 is for Mixed Use. Two maps say otherwise, identifying this erf as Potential High-Density Development. (Volume 2, page 93, Fig. 18, dated August 2021, and the map of the Southern District Sub-District 4 "The Far South" dated February 2022). These maps need rectifying to reflect "Potential Mixed Use" or "Potential Public Service Development" as described and desired - many public services, especially Law Enforcement, are sorely needed in the area and as stated on page 101 this property is well positioned for these public services.	SDF/EMF	General / Other	This issue of contradiction (also raised in other comments) is acknowledged and has received attention and amended where necessary.
117	The residents collectively known as SARDA Support1 hereby submit an Objection to the Draft Municipal Spatial Development Plan 2022 (DMSDP) as pertains to Sub-district 2: Bishopscourt - Constantia - Tokai: New Development Areas 4. SA Riding School for the disabled (SARDA): Erf 16-141, 142, 560 and 684 Size 8.9ha referred to herein as SARDA.	SDF/EMF	New Dev. Areas	Noted. Please see responses below and elsewhere to this matter.
	SARDA herein is defined and refers to all four properties, Erf 141, 142, 560 and 684, making up the SARDA land. This area is Zoned Community CO1, owned Publicly and is Open Public Space.	SDF/EMF	New Dev. Areas	As indicated SARDA is not the owner but a tenant leaseholder. The proposed development guidance indicates this but also indicates the need / imperative for at least a major part of this (large) site to be in future utilised for residential infill - and of a particular kind to supplement existing residential development with a wider range of residential option/s. The guidance does however also refer to the need for the longer term accommodation of SARDA as an important activity.
	The City's proposal to densify and transform SARDA into a higher density residential suburb comprising erf's smaller than surrounding areas is not in keeping with the spatial development objectives for the area. The proposal to transform a green open space into paved densified housing is not supported in the spatial logic of the area.	SDF/EMF	Environment	Disagree. See response above. This has been the development guidance for this site for over 10 years and the City sees no reason for re-consideration of this given the context of the site and its surrounding area realities in relation to broader city imperatives.
	1.6 The above mentioned heritage is supported by the vision and spatial development objects of the MSDP to maintain and enhance these places, unique valley landscapes and land. The City's plan for turning the area into a higher density residential area is not in keeping with the surrounding area, in fact the DMSDP is detracting from the distinctive and unique area as required by the MSDP.	SDF/EMF	New Dev. Areas	Disagree. The two are not mutually exclusive, and both align with the development vision for the Constantia area.

	1.7 The DMSDP for the Constantia region separates parts of Constantia, in particular, the area of the SARDA Support group. Held within the area are various; green belts, historical farms, rivers, wetlands, places of heritage, historic homes, open spaces, remnants of important agricultural land, mature stately trees, wine farm heritage and SARDA. However, these areas are purportedly not part of the arcadian area without any reasonable or defensible argument for the delineation. This area contains the arcadian features that the area is depended on for the role that it plays in the City – associated with scenic routes, equestrian, green belts and riverine spaces, agricultural, cape wine farm and the tourism industry. This is particularly relevant to the strategic objects of the MSDP to conserve, protect, maintain and enhance the Constantia area. To exclude this area does not make any logical spatial sense. These areas are under significant pressure for development and sub-division which in contrast should be protected. This area qualifies as an arcadian area. See figures in Annexure of the type of densification taking place.	SDF/EMF	Site Specific	This area - and the proposals for it - are not seen as isolated from the broader area in which it is located. See responses to this issue elsewhere above.
	1.8 Further to this, this area and properties are significant to the sensitive ecological biodiversity corridors. Sub-division and densification in this area significantly reduces the biodiversity buffer zones which the DMSDP states needs to be protected and afforded with formal protection. This is a buffer zone required to ensure the ecological and biodiversity integrity on which the resilience of the City depends.	SDF/EMF	Site Specific	Noted. All these issues would need to be taken into consideration with any future actual development proposal for any part of this site.
	1.9.1 Page 52 of DMSDP Southern, Volume 3: Implementation Plan section 1.1 Approach to implementation states the following: Ease of process: Removing red tape and improving institutional efficiencies by withdrawing contradictory or overlapping local planning policy with the approval of the DSDF (section 1.5) in line with strategic planning initiatives to provide certainty and transparency to developers and businesses.	Implementation Plan	General / Other	Noted.
	The residents, ratepayers and public have been excluded from the above clause. This is unashameably biased towards developers and profiteering from property development. The residents are currently experiencing "uncertainty and lack of transparency" in planning applications and building applications due to the lack of adherence of existing legal requirements. The City now proposes to increase this by removing the protective measures in place to balance and provide for the rights of property owners. There is growing concern that the legal mechanisms and frameworks are not being adhered to and city officials are conducting the planning applications in accordance with the rights of property owners.	SDF/EMF	General / Other	Disagree. The process has to date been open for comment on numerous occasions. And any (& all) development applications are required always to follow due (legal) process. The rights of property owners - and affected neighbours - are not compromised in any way from what is legally right.
	SARDA has been identified in the DMSDP as a New Development area and from the reading of all the DMSDP, its implementation plan and annexures, there are substantial concerns for Constantia.	SDF/EMF	New Dev. Areas	Noted. Please see responses above.
	2) Status of the DMSDP 2.1 SPLUMA section 22 states that a municipal planning tribunal or any other authority required or mandated to make a land development decision in terms of the Act or any other law relating to land development, may not make a decision which is inconsistent with a municipal spatial development framework. The proposal for SARDA as detailed in the DMDP is inconsistent with the land development objectives as stipulated in the MSDP. The proposal for densification of SARDA must be reviewed and set aside.	SDF/EMF	Site Specific	Noted. However, again, please see responses above.
118	Endorse Sunnydale Ratepayers Association Comment on SDF	SDF/EMF	Site Specific	Noted. Please see responses to these issues elsewhere in response to the SRA.
119	Endorse Sunnydale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	Site Specific	Noted. Please see responses to these issues elsewhere in response to the SRA.
120	Endorse Sunnydale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	Site Specific	Noted. Please see responses to these issues elsewhere in response to the SRA.

	The 'Far South', particularly Solole – Erf 17775 The DSDf makes reference to the 'Far South' sub-district: New Development Areas on page 101, with reference to Par 4.4 Sub-District 4: The 'Far South', Figure 18: The 'Far South' sub-district. Masiphumelele is correctly identified as a local node. The DSDf puts a lot of emphasis on residential, associated densification and associated matters relating to infrastructure as per #3. Masiphumelele: erf 5131: Size: approx. ±5.2ha on page 100. On page 101 reference is made to #8, Solele et al, Kommetjie Road: comprising Erven 17775 (Solole, 5.4ha), 17777 (8.3ha), and 17776 (7.3ha): Total size 21ha. In this section it is noted that Future use should include: Mixed use development inclusive of residential infill and public facilities.	SDF/EMF	Site Specific	Noted.
	The following is noted with regards to the Solole site, Erf 17775: • The size of the property is incorrect with regards to the city map (4.6ha) and the Subdivision Plan from the subdivision of the fire station – Drawing Number 6.002.02, dated 02 March 2018 (4.08ha) • Mixed use development should not be allowed as it would limit what the site could offer to the residents of Masiphumelele. • While the obvious need for residential is noted, far too little emphasis is placed on the dire need to support the masses with public facilities. • It is our belief that the need for public facilities far outweighs the need for mixed uses and residential. Council is requested to limit the future use of at least Erf 17775 for public facilities in order to serve the local vulnerable people of Masiphumelele and Ocean View.	SDF/EMF	Site Specific	Noted. The size of Solole has been amended. The proposed mixed use is for only residential and public facilities. However, to emphasise this further the text has been amended slightly to reflect this. Agreed that social / public facilities are an urgent current and future need and should be accommodated on this site. The current development guidance allows for either - given that the site is owned by Human Settlements Dept who reserve the right to apply for land uses as deemed appropriate.
	request that Erf 17775, Solole be reserved for Potential Public Service Development.	SDF/EMF	Site Specific	Please see response above.
121	Development of Fish sports fields objection	SDF/EMF	New Dev. Areas	Noted. See responses elsewhere above.
122	I urge you to consider the following: 1. Leave erf 17776 as Mixed Use (dark blue) on the maps. (Volume 2, 4.4, page 93, figure 18 and in the Southern District Sun-district 4 "The Far South" map) 2. Amend point 8, Page 101&102 (Volume2) to read: "Future Use: Mixed use development inclusive of residential infill; and public facilities ..", but excluding commercial and Industrial activities which are not advocated on the south side of Kommetjie Road. As the SDSDF and EMF document is reviewed every 10 years, I implore you to consider my proposal. In 10 years' time it can be reviewed.	SDF/EMF	Mixed Use	Noted. However, internal discussion is that both 17775 and 17776 should include similar development guidance, and that a 'mixed use' designation (on the map/s) is potentially more problematic ito 'opening the door to misinterpretation' by the current or future landowner/s.
123	Lengthy Comment about Heritage We note that we did support suggestions aimed at clearer heritage management submitted to you by Stephen Townsend during the first round of comments on the district SDFs; and we note that the now updated SDFs are no more informative or directive in this respect than the drafts of March 2021	SDF/EMF	Environment	In response it is not believed that the current policy guidance in any way contradicts the heritage related intentions and processes for this area. The policy guidance is also mindful here of a) the level of detail to which it focusses (given that this is a district-wide policy) and b) consistency is required in addressing such heritage related issues in all parts of the district (including other areas where clearly this is an issue).
	Indeed, the current HPOZ provisions say only that "[i]n considering an application ..., the City must take into account the effect such activity may have on the significance of the heritage place or heritage area concerned" (emphasis added).³ While this is and must be the correct general approach, it says nothing about the particular building, the place or the environs in question, about the character of the building, place or environs, or about what determines that character (or significance), or what, in each case, the criteria for decision-making should address.	SDF/EMF	New Dev. Areas	This planning policy is not meant to replace or duplicate existing heritage management provisions, but rather align with and complement these in respect of considering (or proposing) appropriate future development & redevelopment.

	Bluntly, this is too vague to have any meaning or effect (and this is in a section on "sub-districts"). Guidance as vague as this cannot give direction in designing proposals, in their scrutiny, or in decision-making especially as included in these areas are land-use zones with floor-area, height and set-back provisions very much at odds with the character of the long-designated HPOZs. This vagueness also applies to the several general heritage-related policies; and the policy which is the most helpful in guiding decision-making in these processes, the urban design policy, is phrased generally without reference to any specific instance or place. There are numerous HPOZs, all regulated via one single criterion: the effect of the proposal on the significance of the building, place or area "irrespective of the existing zoning".	SDF/EMF	General / Other	Please see above for response as it relates to these points.
	lead inevitably to controversy, uncertainty and conflict between applicants, interested parties and the City's decision-making officials; and it should be readily apparent that the SDFs, as the most obvious source of policy-directive in the discretionary decision-making required in every HPOZ-related application, should be much clearer and should refer directly to the character and significance of the HPOZs, should also be congruent with or recognize other relevant policy (for example, the densification policy), and should give clear policy guidance in the balancing of heritage-related demands and the implications of the zoning provisions regarding potentially inappropriate permissible floor areas, heights and setbacks.	SDF/EMF	New Dev. Areas	Again this policy report should also not replace, duplicate, or contradict the provisions of the zoning scheme (re- MPBLs DMS). It is a continuing challenge with planning policy as to how prescriptive to be in development guidance. In most cases there is an overlapping range of development guidance across a number of different policies for any one area (eg. District Plan, Boundary walls & fences policy, urban design policy & others). This is in addition to the provisions of the MPBLs DMS. Assessment of new development proposals remains nevertheless quite subjective - but it is a case of finding the right balance between being too loose and too prescriptive, and also achieving consistency in application across all different parts of the city and specific local areas. The current draft District Plan is hopefully the correct balance.
	Given this, we suggest that each of the district SDFs include a sub-section (probably of the section dealing with sub-district development guidelines) that lists the HPOZs in that district/sub-district and describes the character-descriptions, the character-determining elements, the zoning height and setback limits, and of the decision-making criteria for each of the HPOZs. This is demonstrated in an appendix that illustrates, by example, the kind of provisions necessary for each of eight HPOZs and their significances.	SDF/EMF	New Dev. Areas	The recommendation here would effectively amount to (unnecessary) duplication - which is not the role of this policy (& especially given the enormous scope & resultant document bulk). See also responses above to concerns raised in this regard.
124	Riders in Noordhoek, as committee member of NRA and Tom Ro Haven as well as Noordhoek Common committee, as well being part of the Cape Equestrian Forum. A significant concern at this stage in the commentary process is a clear lack of understanding of the equestrian economy within Cape Town on the part of the City's analysts and planners. The District Spatial Development Framework details intentions to preserve heritage and cultural landscapes, which includes equestrian activities. However, this is not reflected in the mapping and proposed framework plans within the Spatial Development reports.	SDF/EMF	New Dev. Areas	This can't be indicated in a statutorily approved map as it is not yet formalised. Instead the development guidelines text provides intent. This may or may not in the course of time be solidified into a formal overlay. The City believes the current approach to this matter is appropriate. However further work is required on this matter in the next few years.
	In order for horses to remain present within the greenbelts, forests, wetlands and beaches of our city we need to protect the spaces where these horses live. Properties suitable for keeping horses are under threat from private development facilitated by city planning and zoning strategies.	SDF/EMF	New Dev. Areas	The draft District Plan now (as opposed to the 2012 currently approved policy) provides clear acknowledgement of the equine context, needs, and imperative. This is reflected in the revised development guidance for this area.
	the equestrian activities in Noordhoek alone generates an annual revenue of upwards of 45 million. Most of the revenue is going straight into Masipumelele community. Noordhoek is just one of the three core equestrian areas within the City of Cape Town. Without places to ride (TMNP and greenbelt networks) and places to keep horses (rural suburbs) this entire economic ecosystem will vanish.	SDF/EMF	Site Specific	Noted. Please see responses above in relation to this point.
	Our priorities lie in concerns regarding densification, the urban edge, issues around the conflict between the urban edge and Table Mountain National Park, green public open space, and spatial linkages/corridors between these green spaces.	SDF/EMF	New Dev. Areas	Noted. The City believes the tension between these competing interests has been appropriately drafted in the proposed reviewed development guidelines for the area.

Definitions of ecological buffer zones There is a concern regarding the lack of ecological buffers in the zoning/planning maps. They seem to only be present in some parts of Tokai and Noordhoek. This demonstrates a lack of City's ability to provide a buffer between TMNP and the defined urban edge. Thankfully much of the edge in Tokai, Constantia, Noordhoek and Hout Bay is made up of rural properties that are able to dilute the jarring effects of a high density settlement directly abutting a World Heritage Site.	SDF/EMF	Environment	Noted. This is an on-going dynamic matter being addressed by the City's Env management Dept - with definitive outcomes being fed through to planning policy as and when available & appropriate.
Figure 3.8 and 3.11 – Maps demonstrating the District natural assets and urban growth concept. These figures fail to acknowledge existing rural communities/neighbourhoods at Tokai, Constantia, Hout Bay and Noordhoek. This is problematic as these figures only include through area of the Constantia Winelands as agricultural within the district. This leads to further planning misunderstanding of built urban fabric and the social fabrics of these areas.	SDF/EMF	Site Specific	Not quite sure what the essence of this point is. Generally a consistent approach to natural assets & other matters is being applied in all parts of the district and city in the formulation of a revised district plan policy.
4.1 Spatial planning categories e) intensive Agriculture District Development Guidelines 4. In the identified areas limit non-agricultural uses to ancillary rural activities that do not detract from the primary agricultural use and character of the area, but contribute to local character and associated recreational and tourism potential (e.g. equestrian, niche market organic production). Support for the acknowledgement of existing equestrian activities and the need for the preservation of these activities.	SDF/EMF	Site Specific	Noted. This is essentially what the proposed policy is saying.
6. Discourage further sub-division of agricultural land There is concern regarding the hopes of the City to preserve and promote these rural industries/activities by protecting "agricultural" land use yet the mapping fails to include these areas where these equestrian users work and reside.	SDF/EMF	Development Edges / STAs	The mapped 'agricultural areas of significance' relate only to the information layer received from Dept of Agriculture: W Cape as an outcome of periodic assessment of farming areas within the municipal area (based on a range of criteria). Notwithstanding this, general development guidance is proposed that is applicable to all agriculture areas, esp outside the urban edge.
Concern regarding push for densification and development, particularly in the Deep South where access to civic facilities and basic infrastructure is limited and inefficient. This is in conflict with the City Framework prioritising development and densification in the urban core where infrastructure is more capable of handling more people.	SDF/EMF	Development Edges / STAs	This is not in conflict with City development guidance. The MSDF and District Plans support densification (to a greater or lesser extent) across the entire city area inside the urban edge. This includes the Far South area. However, the guidance in policy is clear that this is not an identified growth area of the city and therefore densification is generally limited to small-scale incremental densification (through minor sub-divisions etc).
4.2 Transport infrastructure and route designation In general, there needs to be better provision for pedestrian access along core routes within neighbourhoods, and at intersections with the green network. Many of these roads in Hout Bay, Constantia, Noordhoek and Tokai currently host high rates of equine traffic in unsafe conditions. Solutions are wider pavements, maintenance of verges and stormwater to mitigate obstructions, and to provide safer road crossings. Constantia Main Road and Noordhoek Main Road both host traffic light pedestrian crossings with rider accessible buttons. However, the Constantia lights were only installed after a collision between a vehicle and horse and the Noordhoek lights took years of campaigning and fundraising before approval and installation.	SDF/EMF	Transport and Route Desgn.	Agreed. The draft policy does include general development guidance to encourage and support this.
4.3 Conceptual Designations e) Public links Constantia Neck is identified as an important connection. However it is currently nearly impossible to safely move between areas of the green network run by TMNP and CoCT. Collaboration between TMNP, CoCT and the equestrian community is essential to secure a safe, navigable mountain chain. Also significant would be the inclusion of coastal areas in this chain i.e. Noordhoek Beach.	SDF/EMF	Conceptual designations	Agreed. This is essentially what the proposed policy is saying.

	6. Implementation 6.1 Aligning Service and Infrastructure Planning with the Spatial Development Plan As the equestrian interests lie in maintaining property sizes that can sustain horses, it is in our interests to direct efforts for residential development towards areas with better housing yields per site in areas that can sustain the population growth. I.e. SARDA in Constantia and Silvermine Road in Noordhoek do not yield significant housing numbers to prioritise their development.	Implementation Plan	Site Specific	In principle yes agreed. However, see responses above in relation to the general approach to densification in the city.
	6.2 Guidelines for land use decision making 6.2.1 Hout Bay Support prioritisation of maintaining the spatial character of the valley atmosphere and protection/ improvement of the Hout Bay river. 6.2.2 Bishopscourt, Constantia, Tokai Support the prioritisation of maintaining the spatial character of this significant cultural landscape. We strongly discourage the development of the SARDA site for housing. It is one of the only publicly accessible equestrian facilities in the area and would set a precedent for changes in the surrounding area. It would also remove horses from the cultural significance of the area.	SDF/EMF	New Dev. Areas	Noted. The City believes that the development guidance for the 'Sarda' site is nevertheless appropriate in view of the context and range of city imperatives and competing land use demands.
	6.2.4 The Far South (Noordhoek included) There is strong opposition to the densification of the Silvermine Road site. Noordhoek has a great value for tourism. This big open field with the horses captures the essence of Noordhoek. The plans of developing this particular land will change the feel of Noordhoek for ever and Noordhoek will be of a less touristic value. Developing this land, which host about 45 horses, is a significant loss of stabling opportunities for this amount of horses which no other property can offer.	SDF/EMF	Urban Development	These comments are noted, and the proposed development guidelines for this NDA site has been further amended.
	The ecology must also remain a priority as one of the few remaining leopard toad breeding sites. In addition to these restrictions on the site itself, it cannot be understated the inability of the local infrastructure to handle further densification on this site as well as the continued infill occurring in Capri, Ocean View, Masipumelele and Kommetjie	SDF/EMF	Environment	These comments are noted, and the proposed development guidelines for this NDA site has been further amended. Any future urban development on this site, should it materialise, will have to follow all due processes. This policy also flags key environmental issues to inform such processes.
125	1. Inadequate Heritage Protection for the Claremont Village The heritage plan as per Appendix A does not include the proposed Claremont Village. We strongly object to this omission and lack of acknowledge of the heritage value of the area, and the application by the UCRRA.	SDF/EMF	Environment	Noted. This planning policy receives info from the Environmental Management Dept re- detail concerning heritage in areas across Cape Town.
	c. A formal application has been made to the City of Cape Town in 2021 by the UCRRA for the formal protection of this heritage resource and the registration of a HPOZ for the Claremont Village area.	SDF/EMF	General / Other	Noted. Please see response above.
	2. Delivery with regard for Claimants We wish to raise concern and objection to the lack of delivery for claimants. Although this is acknowledged as being overseen by various levels of Government the apathy of the local authority in enabling restitution within well located urban areas is untenable. We wish to raise concern with the fact that developers are attending to these delivery processes, (i) without due regard, in the case of Claremont, to provide a mixed-use development which would have economic benefit to the claimants, namely not just housing delivery and (ii) that to reverse the apartheid legacy the Bowwood Road development would clearly be advantageous for social / affordable housing development that should be enabled through a very different process with claimants and communities than is currently the case.	SDF/EMF	General / Other	This matter is beyond the scope of this planning policy.
	3. Development Plan for Claremont and Wynberg The plan indicates that the Claremont and Wynberg CBD's are to merge. i. This blanket proposal by the CCT is crude and needs to be fully explored in order to manage and allow for appropriate development; including how to evolve meaningful local urban design proposals so as to establish clear and a well-considered integrated settlement framework that is fully participated.	SDF/EMF	New Dev. Areas	The draft District Plan includes clear development guidance in relation to where different types or intensity of future development will or will not be appropriate. Essentially the development guidance remains no different to that in the current approved District Plan 2012. However, for reasons of consistency in relation to opportunity in key urban CBD areas across the city this area as been accorded Sub-Metro urban node status (which in fact was its designation as far back as the 1st MSDF approved in 1996).

	ii. This cannot be driven by profit margins for developers and without consideration of environment, quality of place in densification and clarity as to constraints and opportunity for community and various types of development agencies. We have not found any information on this that informs the nature of development in the southern suburbs.	SDF/EMF	General / Other	
126	Endorse Sunnydale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	Site Specific	Noted. Please see responses to these issues elsewhere in response to the SRA.
127	Endorse Sunnydale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	Site Specific	Noted. Please see responses to these issues elsewhere in response to the SRA.
	Regarding the development of Fish Hoeks sportfield Enquiry For land We are seeking land to build a preschool on that will enable us to service our communities. Doodlebugs Early Learning Centre is an ECD Centre / preschool that caters to families and children from all walks of life at affordable monthly fees.	SDF/EMF	New Dev. Areas	This is a sportsfield complex - and not a community facilities area. Any proposed future development of a portion of this area is to be directed solely at assisting maximally (ie. better than any other proposal) with (through cross-subsidisation etc) the improvement & optimisation of the functioning of sporting activities here (eg. a new hockey astro turf). These community facilities orientated facilities are not likely to meet this criterion and therefore would not be considered here.
128	Endorse Sunnydale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
129	Objection to building on Fish Hoek Sport's Fields	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Successful precedent exists for this in the city. See also other responses to this matter in comments responses above.
130	Objection to proposed development on the Sportsfield in Fish Hoek	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Successful precedent exists for this in the city. See also other responses to this matter in comments responses above.
131	Endorse Sunnydale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
132	Endorse Sunnydale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
133	Endorse Sunnydale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
134	Endorse Sunnydale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
135	Endorse Sunnydale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.

136	Endorse Sunnysdale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
137	Endorse Sunnysdale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
138	Endorse Sunnysdale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses to these issues elsewhere in response to the SRA.
139	Endorse Cape Equestrian Forum (CEF) comment on SDF	SDF/EMF	New Dev. Areas	Noted. The draft District Plan does now overtly and explicitly acknowledge the importance of the equestrian activities and economy, and does include an associated broad development guideline in relation to this. Further work is required to refine this matter in the coming years. Please also see responses to these issues elsewhere above.
140	Endorse Cape Equestrian Forum (CEF) comment on SDF	SDF/EMF	Environment	Noted. The draft District Plan does now overtly and explicitly acknowledge the importance of the equestrian activities and economy, and does include an associated broad development guideline in relation to this. Further work is required to refine this matter in the coming years. Please also see responses to these issues elsewhere above.
141	Horse Racing Industry: Comments on the CoCT Draft District Spatial Development Plans 2022 2. Kenilworth Racecourse	SDF/EMF	General / Other	Noted. See responses below.
	- As with the District Plan designation for the Durbanville Racecourse, we note the Kenilworth Racecourse is similarly designated in both the 2014 Approved District Plan and the current Draft 2022 District Plan as being an area of environmental sensitivity as opposed to also reflecting on what is arguably one of Cape Town's most iconic venues and a Horse Racing venue of National if not International significance. - While we are comfortable with both the current (2014) and Draft District Plan designation of a "Core Biodiversity" area located inside of the racetrack, we would like to motivate that the City designate the balance of the racetrack (which is currently designated as "Structuring Open Space") as a "Site of Coincidence". This we feel would adequately reflect the current use of the facility and allow for the consideration of future interventions that may be required. - In this regard we note that the current Horse Quarantine Facility (being a cornerstone of the horse breeding industry in South Africa) located within the track is also designated as being "Structuring Open Space" which is an inappropriate designation considering its economic value and function. We request that the City planners redesignate this facility / area to a more appropriate use. - We note that the band of adjacent City owned land along Wetton Road (comprising erven 65266, 65267, 65268, 65269, 65270, 65271, 65272) has also been designated as "Structuring Open Space" which we feel without the necessary environmental and economic studies is short-sighted and should rather be designated as a "Site of Coincidence" which socio-economic value (following the necessary environmental assessment) could be considered in the future.	SDF/EMF	Utility Infrastructure	Comments noted. However, on balance do not believe it appropriate to review the current development guidelines for this area. Identifying the racecourse as a 'site of coincidence' would imply it is an identified future urban development area, which it is not (although the current guidance does not preclude any improvements to current racetrack infrastructure. The same applies re- the 'quarantine facility'. Re- the band of open space adjacent to Wetton Road, this could potentially be reviewed in future, but the current guidance is based on available informants from and environmental perspective.
142	Comment by Tokai District Riding Association (TDRA) We do not believe that the framework provides adequate protection of equestrian properties (by maintaining minimum erf sizes), the historic bridle paths or the few remaining equestrian neighbourhoods such as Zwaanswyk and Noordhoek. The result is that the equestrian properties will be lost, and with them, the horses and the jobs that they create, the unique cultural heritage, tourism opportunities and healthy recreation of horse riding within Cape Town will be irrevocably destroyed for future generations	SDF/EMF	New Dev. Areas	Noted. The draft District Plan does now overtly and explicitly acknowledge the importance of the equestrian activities and economy, and does include an associated broad development guideline in relation to this. Further work is required to refine this matter in the coming years. Please also see responses to these issues elsewhere above.

Allowing subdivision below 4,000 sq m (as per the recently approved subdivision in Suddie Close, Zwaanswyk) will result in the horses leaving and will turn a semi-rural natural district and part of our cultural heritage tuning into just another concrete densified over-built suburb	SDF/EMF	Environment	Noted. The draft District Plan does now overtly and explicitly acknowledge the importance of the equestrian activities and economy, and does include an associated broad development guideline in relation to this. Further work is required to refine this matter in the coming years. Please also see responses to these issues elsewhere above.
3.2.3 Spatial Concepts and Structuring Elements a. Natural Assets "Urban development must respect the presence, role and function of natural assets, and should make the most of the possible benefits residents and visitors can derive from them." Ecological corridors for nature and recreation are essential for providing space for the equestrian community. Without the network of greenbelts and the Table Mountain National Park, the riding community would not have sufficient space to ride. Hout Bay, Noordhoek, Tokai and Constantia's equestrian communities and their downstream economies are dependent on safe spaces to ride. Equestrian activity is therefore directly spatially dependant	SDF/EMF	Utility Infrastructure	The plan District Plan directly addresses all these concerns. Amendments to the 2012 District Plan in these respects to further bolster development guidance in relation to green spaces and networks of importance (see also references to a Green Infrastructure Network).
Sub-district 2: Bishopscourt – Constantia Bishopscourt – Constantia – Tokai sub-district: Development guidelines retention of the minimum erf size of 4000 sq m is crucial to maintain a critical number of equestrian properties in the lower half of Zwaanswyk (the core equestrian area). We believe Zwaanswyk should be designed as an equestrian area of special character when it comes to planning decisions.	SDF/EMF	New Dev. Areas	Noted. The draft District Plan does now overtly and explicitly acknowledge the importance of the equestrian activities and economy, and does include an associated broad development guideline in relation to this. Further work is required to refine this matter in the coming years. Please also see responses to these issues elsewhere above.
propose the following amendments to clause 8 (ii) a. a. With the exception of Zwaanswyk, residential areas further than 400m from existing commercial nodes / precincts may be sub-divided but resultant development of these properties should be limited to the original pre-subdivision permissible rights. Subdivision of properties in Zwaanswyk will negatively impact their ability to stable horses, whether existing or in the future, and will therefore not be permitted.	SDF/EMF	New Dev. Areas	The proposed development guidelines have been revised to respond to this comment as it is considered that the Zwaanswyk area is unique in its context in relation to equine matters and can and should reflect this in development guidance accordingly.
9. Increasing effort should be directed at public access and recreational opportunity through open space improvements and the continuing introduction of footpaths, bridle paths and cycle tracks and lanes along key roads (main connector and scenic routes) and public open space linkages (e.g. riverine corridors). Particular attention should be given to 'gateway' points at the start of footpaths re-overlooking surveillance of development, safety, access for horses, parking, and landscaping.	SDF/EMF	New Dev. Areas	The guidelines have been reviewed and some amendments made to better reflect these concerns mentioned here.
16. Support viticulture and horticulture production, as well as tourism, equestrian and recreations activities, in agricultural and equestrian areas (historical farm estates, Zwaanswyk, Porter Estate, and smaller riverine market gardening areas) through restricting any further fragmentation / sub-division, and encouraging consolidation and expansion. Additional agricultural / equestrian / rural related uses....	SDF/EMF	New Dev. Areas	Noted. The draft District Plan proposed development guidelines now addresses all these issues.
4. SA Riding School for the disabled (SARDA): Erf 16-141,142, 560 and 684 Size 8.9ha • Future use: - Residential infill and community facilities. • Development opportunities - o Publicly owned - o Zoned Community Facility - o Gently sloping land • Development constraints - o Existing riding school facilities on part of site - o Relatively far from opportunities/services 1. While development opportunity exists on the site, the existing SA Riding School for the disabled activity on the site (in an equestrian area) would need to remain (albeit in a more rationalised form), unless in future, through mutual agreement, a more advantageous site is identified.	SDF/EMF	New Dev. Areas	Noted. This is generally what the proposed development guidance for this site now is.

	Sub-district 5: The Table Mountain National Park and environs: TMNP and environs sub-district: Development guidelines Tokai 12. Support the further appropriate development and upgrade of the TMNP HQ area as an eco-destination place. Picnicking, walking, horse riding and biking are key opportunities associated with the most accessible flattest part of the TMNP.	SDF/EMF	New Dev. Areas	Noted. This is generally what the proposed development guidance now makes provision for.
143	Endorse Sunnysdale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses elsewhere in this report to the comments made.
144	Endorse Sunnysdale Ratepayers Association / Capri Village Comment on SDF	SDF/EMF	New Dev. Areas	Noted. Please see responses elsewhere in this report to the comments made.
	Endorse Tokai District Riding Association (TDRA) submission	SDF/EMF	New Dev. Areas	Noted. Please see responses elsewhere in this report to the comments made.
145	Object to development of fish hoek sportsfield	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Successful precedent exists for this in the city. See also other responses to this matter in comments responses above.
146	in support of the City of Cape Town's long term plan and understand the need for more inclusive and affordable housing options along the Wynberg Main Road corridor. This is so necessary, particularly in a hub like Wynberg, offering not only transportation and retail convenience, but also healthcare, SAPS, the court, Home Affairs and so much more. We live 2 blocks off the Main Rd and intentionally chose this location for the convenience and diversity that the whole of Wynberg offers.	SDF/EMF	Urban Development	Noted.
	We found the MSDP document difficult to navigate as laypeople. The meeting designed to address the document was not tailored for an audience of non-experts. Attendees left feeling confused by the information presented. They also felt there was no chance to voice their various concerns or cautionary statements around the spatial planning framework as it relates to densification.	SDF/EMF	New Dev. Areas	Noted. This was somewhat unsatisfactory - and community engagement has been identified as an important area to address in coming years.
	While we are in favour of and support the overall conceptual plan, the two issues that concern us are: 1. Large apartment complexes that once built may be mismanaged either from the rental side or Body Corporate side resulting in overcrowding and nefarious activity taking place therein. This is already a concern relating to one of the current large buildings on the Main Road. 2. Encroachment of new development on existing properties (example is the Aldro on Wellington Avenue, built into the gutter of the adjacent house to the right as one looks at the building), with seeming lack of concern regarding current residential structures by both the developer and also whomever is signing off on plans from the building side.	SDF/EMF	Development Edges / STAs	Noted. Management related issues are a real concern, but unfortunately are beyond the scope of this policy report. These issues should not, however, deter the general direction toward more dense, efficient and liveable urban areas. Nevertheless the nature of most appropriate built form to circumstances is a key issue for consideration, including at a broad level for policy guidance.

	Glencairn. Critical Biodiversity Concerns • The Glencairn Wetlands Reserve is included as a reserve in the reserves • The future proposed Else River Reserve is also included in Reserves, is also indicated in the Composite map and all maps as it is considered a Core 2 area • The flood plain of the Else River is indicated, for both 50 and 100 year timeframes • The Glencairn Wetlands Reserve and the future Else River reserve could be included as a destination based Nature Reserve • Green corridors need to be clearly indicated on all maps • Safety.....	SDF/EMF	Development Edges / STAs	Noted. Protection and enhancement of environmental assets is a key concern of this policy. However, it is believed that the current guidance in place, strongly informed by data from the Env management Dept, is appropriate and strong.
	Incremental Node As Dido Valley/Glencairn is indicated as an incremental node there are a number of points to consider: • With regards to the zoning regulations all properties in the greater Glencairn area, including Dido Valley, could have 3 dwellings on them. The potential population of Glencairn needs to be estimated in terms of services and amenities required, including Early Childhood Centres, schools, youth and community spaces as well as health, social and security services and sporting needs • There is currently no provision for entry level gap housing in Glencairn or Dido Valley of young and low paid professionals. Any future development should address this shortage, especially with the current retirement village and low cost housing provision.	SDF/EMF	Residential	Noted. The revised final draft District Plan does now identify a local 'neighbourhood' urban node for Glencairn (centred on the existing commercial precinct). Widening the range of residential opportunities is advocated for all areas in the district, and incremental small scale densification is also for this area (which should be focussed primarily in vicinity of the proposed node area.
	Market Gardening Glencairn and Welcome Glen have the potential for market gardens especially as the Glencairn Valley was a farming community so the soil and water conditions are favourable for market gardens.	SDF/EMF	Residential	Noted. The district plan does not include development guidance that contradicts this, albeit that general residential densification is being supported.
147	Wynberg Densification Infrastructure Old infrastructure - It makes no sense to add to an already constrained system. Our focus should be on replacing the old Infrastructure first before we can consider adding more pressure to it.	SDF/EMF	Urban Development	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment .
	Transport Congestion - Wynberg being a PTI us residents are subjected DAILY to terrible congestion. Taxis - reckless driving - safety. Lack of law enforcement - densifying the suburb will add to the untenable traffic situation.	SDF/EMF	Urban Development	Much of this is a management related problem which is beyond the scope of a policy report. See also elsewhere here for responses on this matter.
	Housing disaster that is Grand Central, which has made Wynberg Main Road a no-go area for residents. beautiful suburb has been turned into a slum. I have not seen any developers proposals, but it is my understanding that they do not include grey water recycling or solar. If the City approves plans like that, it gives the impression that the City is not concerned about the negative impact it will have on our already crumbling Infrastructure	SDF/EMF	Residential	Much of this is a management related problem which is beyond the scope of a policy report. See also elsewhere here for responses on this matter. The City is increasingly concerned with city resilience issues and you will note that both the new MSDP and District Plans incorporate development guidelines in relation to this into the documents.
	Concerned about the City's ability to monitor and police the developers. I have experienced first hand where "mistakes" are made during the construction phase, and which are then left to slide. In the case I know about the developers deliberately deviated from the plans, knowing full well that they would get away with it	SDF/EMF	Urban Development	Noted that this is a real concern. This is an ongoing management related issue in relation to all development everywhere & the City is cognisant of the need to ramp up resource capability to better address this into the future.

148	Endorse Cape Equestrian Forum (CEF) comment on SDF	SDF/EMF	Environment	Noted. The draft District Plan does now overtly and explicitly acknowledge the importance of the equestrian activities and economy, and does include an associated broad development guideline in relation to this. Further work is required to refine this matter in the coming years. Please also see responses to these issues elsewhere above.
149	Endorse Cape Equestrian Forum (CEF) comment on SDF	SDF/EMF	General / Other	Noted. The draft District Plan does now overtly and explicitly acknowledge the importance of the equestrian activities and economy, and does include an associated broad development guideline in relation to this. Further work is required to refine this matter in the coming years. Please also see responses to these issues elsewhere above.
150	SPECIFIC ISSUES REGARDING THE SOUTHERN DISTRICT: 1. Identified challenges: "Inappropriate development pressure in identified cultural heritage areas (e.g. Constantia, Hout Bay between Valley and Hout Bay Roads, and Noordhoek)." These pressures threaten the Peninsula Mountain Chain, a World Heritage Site, with urban encroachment. The cultural landscapes of Constantia and Tokai are ecologically significant and represent high scenic, ecological, recreational and tourism value in the area. Their protection is paramount to this sector of the district's economy.	SDF/EMF	Development Edges / STAs	Noted. City policy is generally good at addressing this (in-principle). The real challenge is at 'ground level' and especially (but not only) in relation to low income settlement areas adjacent to the urban edge where informal encroachment is extremely difficult to manage. Further constructive suggestions in this regard are welcome.
	2. "Urban development must respect the presence, role and function of natural assets, and should make the most of the possible benefits residents and visitors can derive from them." Ecological corridors for nature and recreation are essential for providing space for human health and wellbeing. The network of greenbelts and Table Mountain National Park are fundamental to this wellbeing.	SDF/EMF	Environment	Noted.
	3. Definitions of ecological buffer zones. There is a concern regarding the lack of ecological buffers in the zoning/planning maps. They seem to only be present in some parts of Tokai and Noordhoek. This demonstrates the City's inability to provide a buffer between TMNP and the defined urban edge. Fortunately, the edges of Tokai, Constantia, Noordhoek and Hout Bay are made up of larger semi-rural properties that dilute the effects of a high-density settlement directly abutting a World Heritage Site. Densifying any of these areas and properties would pose significant risk to the World Heritage Site - and to the urban edge given the growing fire risk associated with increased global temperatures associated with climate change.	SDF/EMF	New Dev. Areas	Noted. See response above and also elsewhere concerning this concern. The peninsula area status quo 'is what it is' and wide 'buffer' areas do not exist everywhere. All roleplayers - including communities, officials and decision-makers - need to continue to be vigilant in formulating appropriate policy and managing development (formal or informal) in policy and the MPBL.
	4. Urban Development 11. Acknowledge and respect the surrounding urban environment and develop accordingly. This includes considerations relating to neighbourhood density and character, and access to public transport, job opportunities and social facilities. Concern is expressed regarding the push for densification and development, particularly in the Deep South where access to civic facilities and basic infrastructure is limited and inefficient. This is in conflict with the City Framework prioritising development and densification in the urban core where infrastructure is more capable of handling more people.	SDF/EMF	Residential	There is clear evidence (& precedent) that the current character of the 'Deep South' can be retained & actually even enhanced if appropriate densification development occurs (ie. through small-scale sub-division, smaller units etc). The 'character' of the 'Deep South' is in any event a relatively recent 'construction' - given that it is today generally a low density suburban area but was 60 or more years ago (ie. not that long ago) generally a primarily farming and rural area. Infrastructure constraints are an issue across the city - and arguably least of all in the Deep South (by far) compared to other areas of the city.
	5. Discourage further sub-division of agricultural land There is concern regarding the hopes of the City to preserve and promote these rural industries/activities by protecting "agricultural" land use yet the mapping fails to include these areas. Further the City's existing permission to subdivide any urban property to 400sqm also raises concerns regarding subdivision of all land.	Mapping	Residential	Quite agree re- any further subdivision of agriculture land. See responses elsewhere to the issue of subdivision within residential areas.

	SUMMARY In order to create a socially and economically well-functioning City must target the following: - Physical and mental health and wellbeing of its citizens. - Increased urban forest and more and more easily accessible greenspaces in line with "15 Minute Cities", the "10 Minute Walk" concept and the "3:30:300" concept. - Introduced species play a critical role in our urban environment. Fynbos conservation must be balanced with urban needs and reality, including the retention and planting of both introduced and indigenous trees. - Decentralise the city and create urban nodes that provide a variety of opportunities for residents thus reducing transport congestion, pollution and carbon footprint. - A climate risk assessment should be completed before the final MSDF is approved.	SDF/EMF	Residential	Generally agree 'in-principle'. However, this has to be balanced with the requirements associated with a growing and continuously changing urban area. It has to be noted that the city is still generally a very low density urban area and thus extremely inefficient by world standards re- urban functioning, services provision, viable public transport etc. Spreading the city outwards is perhaps the worst possible way to address urban growth. The urban development edge proposed is there to ensure this does not occur. Thus urban areas need to appropriately balance increasing densification with increasing attention to green relief areas - which is what this policy attempts to do.
151	Wynberg Densification 1. How will the densification process affect the value of my home when you turn it into a low income area? 2. How many council folks involved in this decision making actually live in the area? 3. Are we going to end up with more drugs, crime, units rented out by the hour, people living the units in shifts by subletting them then they are out at work? 4. Will the betting shops be closed down? 5. Are there sufficient schools and clinics in the area to support hundreds more people? You can't put thousands of people in an area and not provide more schools and clinics. Where are they earmarked on the map? I don't see them. This a huge red flag for me.	SDF/EMF	Urban Development	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment .
	Suggestions: 1. More CCTV camera's 2. More schools 3 .More clinics/hospitals 4. More WID patrolling 5. Close down the betting shops as they attract the drugs. 6. Will the existing old infrastructure cope? Waterpipes are bursting all the time. Recently parts of Wynberg and beyond were without water for many hours with the burst waterpipe in Berwick Ave due to the new development. 7. We have narrow roads to deal with and the residential area is being used as a short cut for taxis and other drivers that want a short cut to Main rd. More speed bumps as it is a residential area. Vehicles race up Oak and Devonshire Rd as there are no speedbumps. 8. Clean up the Main rd by demolishing all the derelict buildings. Get rid of the slumlords.	SDF/EMF	Residential	Some of these issues are management related which are beyond the scope of a policy report. See response above to comments about infrastructure. It has to be noted that the city is still generally a very low density urban area and thus extremely inefficient by world standards re- urban functioning, services provision, viable public transport etc. Spreading the city outwards is perhaps the worst possible way to address urban growth. The urban development edge proposed is there to ensure this does not occur. Thus urban areas need to appropriately balance increasing densification with increasing attention to ensuring adequate services provision.
152	Page 72. With regard to "enhancing public space". This is a phrase which occurs throughout the document and is a very noble objective. But unfortunately it is used in a misleading and contradictory manner. With regard to development of public open spaces for example, Nirvana Park, it is contradictory to talk of enhancing public open space by building a block of flats on it, thus converting it to private space. This is nonsensical and does not "enhance" or "improve" the public space at all. Furthermore, adding a cell phone tower to Nirvana Park is also contradictory because this will pollute and degrade the area, not enhance it. In short, the document's use of the term "enhancing public space" is illogical and contradictory. Residents are not fooled by this attempt at "sanitizing" the proposals.	SDF/EMF	New Dev. Areas	Noted. Nirvana Park is now no longer an NDA (identified new development area). However, a general statement is instead included in the development guidelines that speaks to the need to address 'restorative justice' in Constantia not just through the few remaining identified NDAs (new development areas) but also through additional means of introducing where and as appropriate a wider range of residential types that meet the needs of a wider section of society.. The location of new cellmasts is a challenging issue. This is a demand that has to be met somewhere. Ideally these should be on existing buildings but this is not always possible, which is when public open space land is then looked at.

	Page 73 Item 7. The City cannot expect existing ratepayers to agree with densification in their immediate neighbourhoods if it is going to adversely affect them in terms of reduction in the value of their property, more people, more noise, more traffic, etc. However they might be more accepting if there is some form of financial compensation in the form of reduced rates and compensation for a drop in the value of their property. The latter would be measured by having a real estate valuation before and after the proposed densification. We pay high rates in order to live in Constantia and the City is proposing to densify and take away the spaciousness that we actually PAY for on a monthly basis.	SDF/EMF	Residential	City densification is a reality that has to be accepted and appropriately addressed. Densification is proposed for all parts of the city, which in general is still at very low average densities to be able to be a well-functioning, efficient city (ironically those areas targetted for most densification - due to existing opportunities - are still in many cases those with some of the lowest densities). Further to this, generally - provided appropriately undertaken - densification actually enhances urban living by concentrating opportunities for higher order responses (eg. better parks, hospitals, restaurants, music venues etc). This applies very much also to property values.
	Page 74 Items 11 and 12. This encourages residential development within 800m of Constantia Village and other development nodes with buildings up to three stories together with low cost housing for low income workers. If low cost housing is built close to my residence I would expect some compensation in the form of reduction in rates and a subsidy to compensate for the loss of capital value when selling.	SDF/EMF	General / Other	The development guidance does not refer to low cost housing but instead to lower income housing - in other words meeting demand by a wider range of households - and in many respects assisting with addressing some of the inequities of the past re- historical forced removals - which to date is largely ignored.
	Page 72 to 77 General. If people wish to live in a more spacious suburb they must expect to pay the appropriate rates and purchase price of properties. This is plain economics. The planning document is trying to artificially engineer the natural order of residential choice by imposing cheap and most likely cheaply-built housing in areas of established beauty and spaciousness, consequently leading to their decline.	SDF/EMF	General / Other	Noted. See responses elsewhere to these issues raised. The policy document supports more integrated, equitable urban futures, which include recognising some of the key injustices of the past.
	4. The City has not commented on residents' comments that Alphen Park would be a more suitable area for "development", including erecting a three storey block of flats. There has been no response to our question as to why there is no mention of Alphen Park in any of the planning documents? Its presence seems to have been deliberately overlooked unless it has some kind of special status that we don't know about. 5. Nowhere in Constantia are there three storey buildings – even the shopping centres are restricted to two stories.	SDF/EMF	New Dev. Areas	The draft District Plan has been revised in respect of these issues. Note, however, that the zoning scheme currently effectively permits 'as of right' 3 story development in all parts of the city.
153	Densification, Constantia 1 It's a rural, historical area. This is why people come to live here. We don't need two or up to 3 buildings on properties as this will change the entire ambience and rural feeling of the area and increase the traffic load. 2 Also 3 story buildings will compromise the resale value of adjacent properties as there will be a lack of privacy as they are over looked by neighbours and these homes can also cast shade on previously sunny areas...even swimming pools 3 Lack of greening – With houses so close many trees, which not only give the area its ambience but help us with shade and cleaning the air, will be felled and the biodiversity, that the council are now are trying to improve– re- not mowing verges and parks, will be challenged and lost. We need to maintain corridors for birds, leopard toads etc. 4 Densification will also lead to more hard landscaping – There MUST be a percentage of each property that allows for rain water to penetrate the ground and keep the ground water levels as they are - imagine if all the water from paved properties runs off onto the roads – there will be a problem with storm water drains which were not built to cope with such quantities and increasing flooding in winter.	SDF/EMF	Environment	The current 'ambience' of the Constantia area is relatively new. Some 60 or so years ago almost all of Constantia was farmland with little residential or trees. All areas of the city are dynamically changing. This is not to say that the current Constantia character is not to be protected. It very much is. However, all areas of the city must accommodate in some form or other - appropriate to context - changing imperatives and demands / needs. This includes in Constantia (where households are radically changing in composition, and there is more demand for retirement facilities etc etc.). The draft District Plan explicitly provides new development guidance in association with meeting these demands that supports the protection and enhancement of the area's character re- greening, 'hardening' etc.

154	Densification Wynberg The City is in no position to densify the suburb of Wynberg at present. The suburb is old and the infrastructure is past its useful life Water and Sewerage: water problems - pipes, water and sewerage need upgrading. New development has led to breakages Electricity: overhead lines are also very old. If densification is to happen I would expect the electricity infrastructure to be underground and be upgraded. Traffic: Policing, congestion, increase traffic volumes, noise pollution, where NMT routes? Protection of Green Areas:	SDF/EMF	Site Specific	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City departments cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment.
	Protection of Green Areas: a. The Bridget O'Donoghue Assessment report for the MyCity route highlights concerns that the open areas are to be used appropriately and to be kept green. Will this now be disregarded? b. Developers build right up to the edge of the properties and do not allow for gardens any longer. Trees will be removed and the suburb will transform from a very leafy suburb to one of mere concrete. c. Will the open areas now be sold off for densification or kept as a green area?	SDF/EMF	Site Specific	These are important concerns and are being considered and planned for in all major public developments planned for Wynberg. The area is targeted for densification, but need not be the worse off for it, and can / & should be better off for it - including through greening.
	3. Mistrust in both the City and Developers - transgressions by developers. Fast tracking lead to more flouting of regulations. Right to privacy invaded e. Have surveys compiled by the City for densification been done by an independent and unbiased company and will these stand up in the court of law? g. Will new developments have water saving and electricity saving measures built in as part of densification?	SDF/EMF	Residential	The City is moving increasingly toward becoming a more resilient city. This includes water-wise development etc, but also densification as a key approach in this regard. Transgressions by developers is an ongoing challenge. However, not following this route could result in far more illegality in development than is currently the case.
	4. Problem/Slum Buildings: Wynberg - 30 problem buildings. Ebor Road and the surrounding area is a slum area with problem buildings on the City register. The City has done very little to clean the area up. The issues have been around since 2012 and nothing has changed.	SDF/EMF	Residential	These are management related issues beyond the scope of this policy and (unfortunately) need to be taken up elsewhere.
	Schooling: a. There are only a handful of schools in the area. If densification goes ahead what provisions have been made for schooling? b. At present there is a shortage of schools. How does the City propose this shortage will be mitigated?	Implementation Plan	Facilities	Schooling provision assessments are periodically undertaken by the WC Education dept (in association also with the CSIR) and shortfall areas identified for additional facilities are referred to in the Implementation report (Vol.3). The private sector does also respond where it sees market opportunity in this regard.
	6. Crime and grime: a. The area attracts thousands of people to the area via the transport interchange system and having a court and hospital nearby. b. Presently only the interchange is prioritised for enforcement. c. Drug dealers deal openly without fear from SAPS or law enforcement throughout the suburb. How can this even be allowed to happen and for so long? d. Increased densification will be attractive for more drugs, prostitution, crime and grime	SDF/EMF	New Dev. Areas	These are very real challenges. The recently formed CID (& other agencies) is attempting to address this. New development as a boost to the area will (perhaps ironically) assist in bringing more private sector money into the area to assist with protecting and managing their assets but also adjoining public areas.
	7. SAPS/Law Enforcement: a. Increased population size would have more strain on policing. We already do not have enough police officers by world standards. What mitigations have been put in place for more police officers? b. Wynberg has a Law Enforcement office yet one block away we have all the crime and grime. Are the officers intimidated and unable to perform their duties?	SDF/EMF	Crime and Safety	See responses above to similar services provision issues.

155	Map Inquiries INQUIRY: MAP indicating "Cape Winelands Cultural Landscape" inside the TMNP Protected Area, that is demarcated land of the Cape Floral Region Protected Areas May I suggest that if there is no truth to this sectional indication, that this Map is immediately withdrawn and the expiring date extended with 14 calendar days: The following questions refer: 1. Since when is the Cape Winelands Cultural Landscape part of the Cape Floral Region Protected Area? It only indicates the date of nomination in 2015. 2. There seems to be NO indication on the UNESCO World Heritage Site relating to the Cape Winelands Cultural Landscape site on the internet. Where is this sectional and cultural inclusion announced? 4. Is SANParks aware of this process? 5. Where can the Authority in charge of the Cape Winelands Cultural Landscape be contacted?	SDF/EMF	Environment	The map in question actually indicates 'Constantia Winelands Cultural Landscape' and not 'Cape Winelands Cultural Landscape'.
156	Object to development of fish hoek sportsfield	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Successful precedent exists for this in the city. See also other responses to this matter in comments responses above.
157	We have numerous issues in Bexhill Road and the immediate vicinity along the railway line. The Yusufeyah Mosque, a place of worship is being targeted by your 'tent owners' who have more rights than we as rate payers. Comparing Wynberg East with Hatfield village and why we have not received the same protection.	SDF/EMF	Site Specific	Tent' issues etc are management related issues which are beyond the scope of a policy report. The Wynberg east / Hatfield village (heritage) issue is being considered by the City's Environmental Management Dept.
158	Opposed to densification in Wynberg Sewerage problems, traffic, taxis are a problem	SDF/EMF	Site Specific	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment .

159	Object to development of fish hoek sportsfield	SDF/EMF	New Dev. Areas	Noted. However, budget is increasingly constrained for improving open space, and particularly sportsfields areas / complexes to standards higher than that generally applied to such areas across the city. But where such facilities could be improved through cross-subsidising mechanisms, and simultaneously not compromising the facilities themselves then this should be pursued. This facility includes certain very over-utilised facilities (eg. soccer / rugby pitches) but also under-utilised spaces eg. areas between sportsfields &/or club buildings). Redevelopment of these through (short term & long term annual) cross-subsiding alternative uses can realise this without compromising, but actually enhancing, open space & sports facilities. Successful precedent exists for this in the city. See also other responses to this matter in comments responses above.
160	Opposed to Densification in Wynberg	SDF/EMF	Urban Development	Densification of Wynberg, through a redevelopment boost, is probably exactly what this area needs to be able to overcome longstanding urban management related problems that have developed over the last 50 years as it has steadily degraded. Key to this regeneration is major new public infrastructure. Planned infrastructure includes for the MyCity re- the PTI, and the 'couple' road to address local area traffic congestion. The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment .
161	Densification Wynberg The necessity of densification is understood, I believe there needs to be a proper understanding of traffic flow and also the redirection of traffic. If not studied properly and done properly, the resulting buildings will cause traffic congestion and severely impair property values of current owners.	SDF/EMF	Site Specific	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment. Roads planning is a key element relating to future development in the area and detailed planning is in place and regularly revised in prep for implementation.
163	Opposed to densification in Wynberg	SDF/EMF	Urban Development	Densification of Wynberg, through a redevelopment boost, is probably exactly what this area needs to be able to overcome longstanding urban management related problems that have developed over the last 50 years as it has steadily degraded. Key to this regeneration is major new public infrastructure. Planned infrastructure includes for the MyCity re- the PTI, and the 'couple' road to address local area traffic congestion. The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment .

164	Densification Wynberg Affect on property values, noise, traffic, safety, cleanliness. It's shocking that COCT would move hundreds of people into an already compact area. The traffic is already so terrible and this will make it worse. Main road cannot be widened and the M5 isn't getting any more lanes soon	SDF/EMF	Site Specific	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment .
165	Densification Wynberg Concerns regarding the proposed increased load on our infrastructure, services and security. Struggling with traffic congestion - safety and security - spend money on private security Why would densification be considered if the current situation cannot be managed?	SDF/EMF	Site Specific	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment .
166	Wynberg Densification deeply concerned regarding the issue of densification. While we understand that densification reduces the use of green buildings, we believe that if densification is to take place in the residential areas the apartments should • Not be higher than two storeys high • Have space for indigenous gardens to allow the Cape Rain Frog to thrive • Architecture of building should be consistent with the architecture of Wynberg • More densification means high traffic congestions • More densification means higher criminality	SDF/EMF	Urban Development	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment .
167	Wynberg densification We totally lose the densification of Upper Wynberg (west of Main Rd), especially Chelsea Village and Wellington Ave/Mortimer Rd - the school traffic every morning is already dangerous. And the character of this heritage area will be ruined with buildings over 3 (three) storeys being allowed!	SDF/EMF	Site Specific	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment .
168	Wynberg Densification Opposed to densification - overcrowded, traffic congestion, integration between low and high income - how will they afford living in this area? Drop in property values. More suitable land along N1 at Century City.	SDF/EMF	Site Specific	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment .

169	Wynberg Densification 1.GENERAL COMMENTS • Densification, intensification and more access to affordable housing make sense for Wynberg as it is the main hub of the area. • The City's vision of a highly diverse, vibrant urban environment with residential, commercial and mixed-use areas is exciting. • Especially exciting is the plan to upgrade Maynardville to a space akin to New York's Central Park, to have many pedestrian areas and to "relieve" the more densely built areas with open and often green public spaces • Designating Wolfe Street as a scenic route and redeveloping the PTI are equally positive.	SDF/EMF	Site Specific	Noted. This comment is welcomed as a very positive contribution into discussion about the appropriate future development of Wynberg.
	The documents also stipulate that the redevelopment of Wynberg West requires further detailed precinct planning and consensus (DTR, page 84). This does not reflect our current reality. New developments have been allowed for many years in this area with no local plan nor with any attempt at finding consensus. Comment A precinct plan for this area must urgently be drawn up in cooperation with Wynberg residents and stakeholders before development of the area continues.	SDF/EMF	General / Other	Noted. Agreed, this remains a priority & unfortunately has been significantly delayed.
	3.DEVELOPERS: ACCOUNTABILITY AND ENCOURAGEMENT Interests of developers will take priority above the interests of current residents a. The Aldro apartments in Wellington Road contravened building regulations after a mistake was made by the City's building inspector. The tall outside wall of the building is now much closer to the outside wall of the neighbouring cottage than building regulations allow. b. Grand Central apartments in Main Road have become a crime, health and safety risk. The developer (The Leisure Group) still owns many apartments in this building but refuses to take responsibility. Attempts by SAPS and two successive local councillors to address the issue proved fruitless.	SDF/EMF	Crime and Safety	Management related issues are beyond the scope of this policy report and can not therefore be addressed here.
	Comments • The City and developers must take responsibility for contravention of building regulations and always rectify. (This should go without saying.) • The City must honour its own guideline to improve safety and security in the areas it aims to develop (BAR, page 83). • Developers should be encouraged to take pride in and responsibility for their buildings and the surrounding area. The City could assist with this. This could include for instance, planting trees, developing vertical gardens, etc. • The City should be careful about approving applications from developers with a history of irresponsible behaviour.	SDF/EMF	General / Other	Agreed re- building contraventions. However, this is a management related issue and beyond the scope of this policy report and can not therefore be addressed here. Re- greening related issues this policy does include various guidelines that aim to support this, and especially in targetted density areas (along Main Road corridor).
	4.ENGAGEMENT WITH STAKEHOLDERS AND RESIDENTS Background DSDF documents suggest the City should engage more with residents, be more transparent, and win back residents' trust with regard to development (TR page 83 point 31; BAR page 120). In practice, there has been very little meaningful engagement and almost no transparency. Comment That the City follows its guidelines and engages with residents and stakeholders about new developments so that a win-win outcome can be achieved.	SDF/EMF	General / Other	Noted re- the need to re-think engagement with the public. This is to be given serious thought by this dept into the future.

170	Opposed to densification in Wynberg	SDF/EMF	Site Specific	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment .
171	Wynberg Densification in favour of densification and intensification of land use in favour of low-income housing. However, the following points will highlight areas of concern.	SDF/EMF	Urban Development	Noted.
	However, the following points will highlight areas of concern. 1. Neighbours and the WRRRA have pointed out the need to ensure that specific parameters and levels of accountability needs to be in place before the green-light is given to private developers. For me, this should include: 1.1 Renewable energy sources (wind/sun) 1.2 Energy-efficient designs using natural light and deciduous trees 1.3 Passive heating and cooling 1.4 Recycled and/or sustainable building materials 1.5 Wastewater and rainwater treatment use and reuse 1.6 Smart lighting 1.7 Sustainable smart designs with minimal impact in terms of maintenance 1.8 Smart sustainable water-wise and food gardens 1.9 Sufficient time needs to go into consultation with local communities (specific streets) where buildings will be erected. It is important to gauge the impact that a five storey building would have on its immediate neighbours and their quality of life. 1.10 Above all the design needs to be aesthetically pleasing. Apartheid spacial planning as seen on the Cape Flats and more closer to home like Grand Central apartments only attract illicit behaviour and decreases the quality of life not only for the residents but the larger community. 1.11 Sufficient off street parking	SDF/EMF	Urban Development	A number of very real concerns are mentioned here, and every effort is required to address these. Many are management & maintenance related and effectively beyond the scope of this policy. However, there are certain planning and design related guidelines that can assist. many are already incorporated into existing policies (eg. maximising overlooking surveillance to assist with addressing crime) but there are others that have been incorporated into this draft District Plan (eg. recommendations towards improving the public realm through development or redevelopment). However, some of these very good & practical suggestions will require further investigation and engagement into the future towards their appropriate inclusion and effectiveness in planning policy (&/or elsewhere).
	Need more healthcare facilities Affordable Education Road safety concerns Public Transport - Wynberg PTI unsafe, MBT taken over Safe recreational spaces - prevents health and social ills such as gangsterism and drugs Maintenance of Infrastructure Public Engagement - old ways of engaging communities are insufficient by both the accounts of the residents and the city officials who admitted to such. Try to change the way in which you engage with the larger community. It might take a little longer and it might be a bit more costly but public buy-in is important if you want to build communities where the members feel heard, seen and truly part of the community	SDF/EMF	Facilities	Noted re- the need to re-think engagement with the public. This is to be given serious thought by this dept into the future. Similarly re- changing circumstances and realities re- increasing crime etc. Public facilities provision is an on-going inter-dept and inter-govt activity and careful consideration is given to alignment of plans across all depts to ensure adequate provision at the right time. The periodic CSIR assessments have provided clear guidance into this draft District Plan in this regard.
172	Opposed to densification in Wynberg	SDF/EMF	Urban Development	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment .

173	Wynberg Densification 1. Infrastructure - water and sewerage problems, electricity - outdated and structural issues 2. Traffic - Congestion, public transport only work if metrorail works, speed bumps - Cogill Road, parking remains problem, poor NMT. 3. Protection of Green Areas and the introduction of biophilic design. developers building onto property lines, make no plans to plant gardens, blank concrete walls - want green the walls see the introduction of biophilic design in all future developments	SDF/EMF	Urban Development	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment. The city will continue to grow - & concentration in optimal locations brings increased local and wider area benefits. Clearly, however, in historically valuable areas such as Wynberg appropriate development sensitive to context is a very important issue.
	4. Developers and their poor track record in Wynberg - "Rogue Developers" flout regulations, rather pay fine, city inspectors held accountable. Fas tracking of dev allow more flouting.City favour dev over residents. Providing incentives for developers only empower them. Right to privacy invaded. 5. Problem / Slum Dwellings - slum buildings first sorted out before denification implemented. Ebor Road - various problem buildings on City register that needs to be sorted out. Grand Central - densified development which has deteriorated into a hotspot of crime. 6. Schooling - long waiting lists, shortage of schools. 7. Crime and Grime - influx of people more crime - and grime. Residents pay for pvt security, police overstretched and unresponsive. Drug dealing rampant.	SDF/EMF	General / Other	These are very real problems, and require good urban management. This is particularly challenging, however, in areas in decline - which has been the case for at least /near 50 years. Significant new public investment and (appropriate) private sector response (which various policies attempt to achieve alongside the MPBL's DMS) can be & is possible (eg. in city CBD & Claremont CBD areas).
174	8. WRRRA comments on DSDF Volume 3 (DSDF3) DSDF Vol3 : Section 1.2 : Page 6 of PDF WRRRA Comments: Wynberg is a unique, characterful and settled suburb. It is one of Cape Town's oldest settlements and contains three Heritage Protection Overlay Zones (HPOZs), one already declared and two designated. These HPOZs cover areas that have special historical and environmental qualities, which contribute to a distinct feeling of place. Wynberg Main Road itself is one of the last remaining pieces of the original Main Road, and has a charm and character because of its scale and its instinctive pedestrian-friendly colonnades. It is this very quality of place which is placed under threat by the current proposal. Wynberg is characterised by cohesive development patterns, which run from large building footprints directly related to Main Road to smaller parcels in the residential areas to the West of Main Road.	SDF/EMF	General / Other	31 Pager Comment. See responses to all main comment issues below (noting that much of this will also be responded to in the MSDF comment report).
	Concern that area between the proposed 'couplet' will become a 'dead zone' subject to crime & general urban degradation.	SDF/EMF	Site Specific	This is currently already occurring as Wynberg increasingly under-performs relative to nearby urban node areas. The proposed major public infrastructure investment is likely (contrary to feared) to bring more development response, more business and residential to support urban management (eg via the CID).
	Infrastructure capacity will be problematic with increased densification and intensification.	SDF/EMF	Site Specific	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment .

	Concerns that the WRRRA has been sidelined or evaded by public processes associated with the MSDF and DSDF.	SDF/EMF	General / Other	The City has made every effort (beyond legally required public participation requirements) to engage with all communities and the public in general. Arguably there is little further that could have been done in this regard. Moreover, most of the stated proposed plans for Wynberg included in the draft District Plan are longstanding plans for the area going back at least 10 years.
	(Continuing) concern with inappropriate development in the area (eg. new flats in Berwick Road).	SDF/EMF	Site Specific	The draft District Plan devotes significant attention to - through development guidelines - attempting to ensure appropriate development outcomes according to local area context. This, however, will always be a subjective matter and is reliant on good decision-making involving all roleplayers and affected parties.
	Concern (with submission of many examples) with recent densification outcomes in the area.	SDF/EMF	Urban Development	This dept believes that on the whole most if not all of these developments are in fact appropriate and positive contributions to the area, bearing in mind that these are quality (& not shoddily) completed developments, are in an area targetted for future densification (as per policy), and provide for a wider range of residential opportunities in the area re- changing lifestyle needs and practical realities (e.g. smaller units, addressing crime, providing rental in good locations).
	Request for inclusion of certain aspects in all new developments in the area (e.g. grey water tanks and filtration; solar; biophilic design that can make use of the skills created by a local community garden, all plants should be waterwise, oxygen producing and evergreen; balcony gardens; dedicated playgrounds and gardens etc.)	SDF/EMF	Crime and Safety	In general these are all good suggestions and agreed with - and mostly are at least being recommended even if not (yet) legally required.
	Objection to large blank walls on new blocks of flats.	SDF/EMF	Urban Development	Noted. However, there is the prospect of the neighbouring property in future also building new flats - and fronting windows would be inappropriate. Notwithstanding this, all big applications are assessed to a range of policies & different respective depts (eg. Urban Design re- tall buildings policy).
	DSDF Vol3 : Section 1.2 : Page 7 of PDF WRRRA Comments: Refer to Point 2 "Impact on Wynberg's urban form and fabric" - introduction of a new Main Road into Wynberg West suburb. Wynberg needs a holistic urban design considering all parts: current residential homes/flats, current vacant land not released by province, green spaces/parks, public amenities (libraries), surrounding schools, SAPS, Municipal Courts, existing businesses, traffic flow, people movement (foot traffic), MyCiti, PTI, new residential or mixed use developments etc. Alteration of the residential precinct by a new road and NMT route bisecting through the precinct of fine grain, single storey residential use buildings, interspaced with vacant erven The nature and functioning of Wynberg West will be drastically changed by the new road bisecting through existing fine grain fabric. The impact on the residential area between Main Road and the new road will be "the consolidation of existing fine grain development blocks into large development parcels". This will result in the development of multi-storey, not single-storey, residential buildings and commercial creep.	SDF/EMF	Urban Development	Agreed. The City is via various mechanisms attempting to take a fully holistic view to planning and implementation of future public & private development in the area.

<i>Change to the urban fabric with the division of blocks by the new Road</i> The proposed new road will be open to all forms of traffic (taxis, buses, cars, trucks) and will not solve the taxi off-route and speeding issues. If anything, it will make these problems worse and result in increased traffic, noise and pollution in the residential areas. The only three off-roads on the western side, namely Church St., Piers Rd, and Wellington Rd/Durban Rd will become rat-runs through the Cogill Road proposed HPOZ and the Old Wynberg Village HPOZ to and from Waterloo Rd and Alphen Hill, especially by taxis. Waterloo Road and Alphen Hill are already at capacity, while Piers and Church Roads run either side of Maynardville Park, a public amenity. Having a second Main Road running through residential areas will bring the existing problems of crime, litter and other issues further into the residential areas. Despite the efforts of many role-players in Wynberg, the existing problems have not been addressed.	SDF/EMF	Transport and Route Desgn.	The proposed new road will 'unlock' the area in a big way, but obviously is dependent on , & must come with, good urban (&traffic) management.
The road will turn Wynberg into a "tunnel" that will benefit those travelling through Wynberg, not the Wynberg residents and businesses. The new road is another obstacle to shoppers from the West wishing to access the CBD on foot. The changes in traffic volumes and circulation patterns will have a negative impact on businesses located along Main Road. Research shows that one-way streets result in faster-moving traffic (posing threats for pedestrians and motorist safety) and increased levels of exhaust, noise, and pollution. In fact, a key strategy to renewing downtown historic neighbourhoods is to convert one-way to two-way streets.	SDF/EMF	Transport and Route Desgn.	Noted,. Please see response elsewhere here on this matter.
The new road will result in an unacceptable severance of the residential area, form an additional barrier for pedestrians that use Piers Road, Maynardville Park and Church Street to go between public facilities/institutions/places of work (schools, Victoria Hospital, magistrates court, police station, military base etc.) and Main Road and the transport interchange. Having a second Main Road running through residential areas will bring the existing problems of crime, litter and other issues further into the residential areas. Despite the efforts of many role-players in Wynberg, the existing problems have not been addressed.	SDF/EMF	New Dev. Areas	Disagree. This will indeed drastically change the area, but (as per responses elsewhere here) this can only be a positive for an area which has been in serious decline for near 50 years.
DSDf Vol3 : Section 1.2 : Page 7 and 8 of PDF WRRA Comments: <i>Island created by new Main Road and Commercial creep further into the suburb</i> The nature and functioning of Wynberg will be drastically changed by the new road bisecting through existing fine grain fabric. The impact on the residential area between Main Road and the new road will be "the consolidation of existing fine grain development blocks into large development parcels". This will result in the development of multi-storey, not single-storey residential buildings and commercial creep. Currently businesses are predominantly along Main Road, not in the residential area west of Main Road. An "island" will be created between the relief road and Main Rd. This will bring commercial development closer to the established residential fabric, increasing the risk of creeping commercialism into the neighbourhood and the designated and proposed HPOZs. The Old Wynberg Village HPOZ has a delicately balanced mix of commercial and residential uses that must be retained, and further commercialisation would add to the pressure of traffic flow and density that is already of concern in the Village	SDF/EMF	Urban Development	Agreed the nature & functioning of Wynberg will be drastically altered by this proposed road couplet. However, it is believed this will greatly enhance the area by kick-starting development (renewal) which has been absent for near 50 years.
DSDf Vol3 : Section 1.2 : Page 15 into 16 of PDF WRRA fully supports the need for green spaces within Wynberg West. These are great ideas and fully supportive, but they will again become areas that are damaged, become dumping areas or vagrants will sleep/stay they if not locked up every night.	SDF/EMF	Urban Development	Urban management will be key. Significant new development in the area can assist greatly in this regard, turning around an area that has been in steady decline for up to 50 years.

	DSDP Vol3 : Section 1.2 : Page 17 and 18 of PDF Wynberg has many pieces of vacant land which are on the old road schemes. The vacant land dates from the Apartheid-era expropriation for the then proposed bypass that would have gone through Maynardville. In 2002, the City undertook to initiate the deproclamation of the old bypass schemes in order to release the land. Twenty years later, Wynberg is still waiting. We desperately need to release these sections of vacant land so that they can be used for other means. The current vacant land brings with it numerous other issues:	SDF/EMF	Transport and Route Desgn.	Noted, and agreed this is a problem for the area. This is outside the scope of this policy. The Mobility dept has been working on this matter for some while but has still to conclude on this.
	DSDP Vol3 : Section 1.2 : Page 45 of PDF Infrastructure As indicated in other sections of this document, Wynberg is a very old suburb and the current service infrastructure needs to be replaced and upgraded to cater for proposed changes. The current sewerage and underground piping systems date back to the turn of the century. We have regular pipes bursting which have increased significantly due to an increase in traffic over the last few years.	SDF/EMF	Transport and Route Desgn.	Noted. See responses elsewhere above.
	Comments below added from FUTURE CAPE TOWN MAILBOX	SDF/EMF		Noted.
175	Glencairn Wetlands Reserve included as a reserve in the SDF. A newer development is the pending application for the ELSE River Reserve which was voted on at the GEESE AGM – this has wider implications than the SDF but needs to be considered therein	SDF/EMF	New Dev. Areas	The District Plan (& MSDP) provide spatial planning policy development guidance. These are important informants to any future development decision-making. However, they do not give or take away land use rights, and also cannot in of themselves determine the outcome of a land use application process (eg a rezoning application).
	With regards to the zoning regulations all properties in the greater Glencairn area, including Dido Valley, could have 3 dwellings on them. The potential population of Glencairn needs to be estimated in terms of services and amenities required, including Early Childhood Centres, schools, youth and community spaces as well as health, social and security services and sporting needs	SDF/EMF	General / Other	Noted, and in-principle agreed. It should b noted (importantly) that the trend is increasingly of smaller household sizes, and also generally rising income and ageing levels - such that more residential units (of smaller units - & likely fewer persons per bedroom - and part-time residents re- holiday accommodation) does not equate to more people in the area. Infrastructure and services provision levels are a general concern across all areas of the city - but are likely of the least concern or impact in this area.
	There is currently no provision for entry level gap housing in Glencairn or Dido Valley iro of young and low paid professionals. Any future development should address this shortage, especially with the current retirement village and low cost housing provision.	SDF/EMF	New Dev. Areas	Agreed. And such guidance is already included in the general development guidelines for the Far South area (see pt 7).
	Glencairn and Welcome Glen have the potential for market gardens especially as the Glencairn Valley was a farming community so the soil and water conditions are favourable for market gardens	SDF/EMF	New Dev. Areas	The current policy does not deny owners from pursuing this as an activity, and there is also general supporting guidance for the district generally that encourages this.
176	While we are in favour of and support the overall conceptual plan, the two issues that concern us are: 1. Large apartment complexes that once built may be mismanaged either from the rental side or Body Corporate side resulting in overcrowding and nefarious activity taking place therein. This is already a concern relating to one of the current large buildings on the Main Road.	SDF/EMF	New Dev. Areas	Noted. However, this is a management issue (beyond the scope of a policy report) and should not be reason to deviate from the general approach for densification (& all the far greater negative impacts if this is not done).
	2. Encroachment of new development on existing properties (example is the Aldro on Wellington Avenue, built into the gutter of the adjacent house to the right as one looks at the building), with seeming lack of concern regarding current residential structures by both the developer and also whomever is signing off on plans from the building side.	SDF/EMF	General / Other	This is a management issue (beyond the scope of a planning policy)
177	The historic wine farms in the Constantia Valley that are world-renowned heritage sites which form the matrix of Constantia's cultural landscape and Constantia's many other historic buildings and sites are not acknowledged in the City's vision statement for Constantia. This omission in the City's vision statement should be remedied.	SDF/EMF	General / Other	Disagree. These farms are acknowledged in the vision, & development objectives and guidelines.

	The trajectory and visible changes brought about by the City's commitment to densify Constantia is the greatest threat to the special character of Constantia. There are immediate local impacts on residents. Aging and inadequate electricity, water, sewerage etc. infrastructures, noise, privacy and visual intrusion all materially and negatively impact on the environment and on the public.	SDF/EMF	Residential	Disagree. There is clear evidence (& precedent!) that the current character of Constantia can be retained & actually even enhanced if appropriate densification development occurs (ie. through small-scale sub-division, smaller units etc). The 'character' of Constantia is in any event a relatively recent 'construction' - given that it is today generally a low density suburban treed area but was 60 or more years ago (ie. not that long ago) a primarily farming and rural area (with relatively few trees). Infrastructure constraints are an issue across the city - and arguably least of all in Constantia (by far) compared to other areas of the city.
	In the Technical Report Volume 3 subsection 1.6.6.b heritage exemptions are mooted for the Tokai area as appears on the map Fig 11. This is of concern given that Steenberg Farm, one of the oldest historic farms in the Constantia Tokai Valley is located in Tokai and for this reason alone heritage exemptions as envisaged in this document cannot be supported. Environmental exclusions are mooted in subsection 1.6.6.a and the same comment applies.	SDF/EMF	Residential	Noted. However, it is also made clear that heritage (& other env exemptions) are to be very carefully considered before introducing. Hence the current scenario of very few having yet been included despite significant investigation.
	The notion of investment incentives for the Film Industry as mooted in subsection 1.6.6.c of the Technical Report Volume 3 requires comment. This vague notion poses many questions eg. who would be the recipients of investment incentives and for what purpose? If the incentives are intended for investors to establish film studios in the City, then how does this fall in line with the City allowing owners of residential properties to use their properties for commercial filming in residential areas in direct competition with investors who invest in purpose built film studios in and around Cape Town? Film shoots are promoted by the City of Cape Town at the expense of significantly increasing negative impacts on neighbours which also compromise the integrity of residential areas.	SDF/EMF	General / Other	Noted. This is a detail matter which will continue forward to first be very carefully considered.
178	MSDF vol1: Page 28 (map 2d): Why are Noordhoek, Poespaskraal and Imhoff's Gift not mentioned as historic settlements (all three were created in 1743)? All three settlements have various valuable heritage contributions	SDF/EMF	General / Other	The MSDF is a metro-wide policy report and as such cannot delve into high levels of specific detail. This information should be acknowledged in the District Plan's Baseline report for 2022 - as an important informant influencing future planning and development responses and outcomes. Poespaskraal, Imhoffs Gift and Noordhoek have their origins in historical farms. The heritage resources in around these three areas are mapped and accessible on the Heritage Inventory which is published on the City of Cape Town Map Viewer. In this map, 'historic settlement' refers to historical villages.
	MSDF vol1 With an ever advancing and increasing densification we are adamant that the Noordhoek common, the Noordhoek Nature Sanctuary and the Noordhoek greenbelts (between Noordhoek Main Road and Silvermine Road in CroXer's Valley, and between Silvermine Road and the mountains in Noordhaven and San Michel) must be designated as Critical Natural Assets as they provide essential natural spaces for residents as well as corridors for the animals to move from mountain to wetlands and back. Map with erf numbers can be provided if required.	SDF/EMF	Environment	A designation as 'critical natural asset' relates only to biodiversity significance. It is agreed that the relative terminology utilised has potential to create a sense of relativity in importance between biodiversity significant areas and open space areas of high significance. From a spatial planning perspective, however, the district plan accords at least as much significance to the latter (ie open space areas of significance) - and argueably even more.
	MSDF vol1 Page 68 (table 5.4): we are happy to read: Development of coastal economic and social opportunities must be undertaken in a manner that does not reduce, harm or degrade the coastal environment or its ability to cope with climate risks in the future. However, we seek clarification of the term "coastal environment", so that it is possible to apply the definition consistently across the SDF. The term is currently used as a very loosely. Houmoed Phase 1 extension will seriously harm and degrade the coastal environment in terms of ecosystem services etc., but it is still in the Southern District SDF	SDF/EMF	Environment	Noted. The text could be amended / re-phrased to try eliminate the term 'coastal environment' and so eliminate any potential misunderstandings. However, to do so runs the risk of adding to an already very lengthy terms explanation annexure, and this term is considered pretty self-explanatory - and unlikely that any misunderstanding is going to have negative development implications in relation to possible misunderstanding..

	MSDF vol1 And further on page 69: it reads - Ensure the conservation, maintenance, and restoration of coastal dunes, floodplains, wetlands, river corridors, and riparian habitats in order to ensure that the green infrastructure function that these perform in terms of flood attenuation and climate change risk reduction are preserved. Consideration should be given the surrounding areas because anything that gets developed around dunes, wetlands, riparian habitats etc. will impact them. We would like the text to mention that all developments that would impact the wellbeing of these natural spaces will not be allowed in the surrounding area – the Imhoff's Gift massive development is an example that will impact the wetland, toads, caracal corridor etc. etc.	SDF/EMF	Environment	Noted. This is however something that automatically is taken into consideration by policy (such as the district plan) and the MPBL in evaluation of such applications.
	MSDF vol1: Refer to our comment about green spaces on page 54. which we believe should include Noordhoek Nature Sanctuary and the Noordhoek greenbelts (between Noordhoek Main Road and Silvermine Road in CroXer's Valley, and between Silvermine Road and the mountains in Noordhaven and San Michel) • The Green Infrastructure Network (GINet) has been developed based on mapping open spaces, in relation to a range of ecosystem services that they provide. Questions that relate to ecosystem services were considered for each space identified and the space evaluated accordingly.	Mapping	New Dev. Areas	Noted. The draft District Plan Technical Report (Vol.2) - which is the only report to be statutorily approved is very clear in its development guidance concerning these areas. Any proposed development in these areas will at the least trigger an inconsistency with policy and require a deviation from this policy to be successful.
	MSDF vol1 Page 77: The Coastal Edge should be extended to include Docke's Farm (Erf 4835, Chapman's Peak) since it falls within the area at risk of flooding. As can be seen in the inundation map produced by CoCT, erf 4835 (highlighted in green) is at similar significant risk as the properties to the West which fall on the seaward side of the coastal edge (red line). This is logical if one considers that the low lying Vlei is located on the property.	SDF/EMF	Environment	In principle agreed. The Coastal edge in this area (where it is at odds with the urban edge by 'extending an arm into the wetlands') has been identified as problematic and this matter is being addressed. The problem here is that the coastal edge is approved not just by the City but also by National Govt into the ICMA, and so now will require a very lengthy process to amend.
	MSDF Vol 1: Page 142 (Policy 9): Densification should take into consideration other (conflicting) policies and must not automatically override these, since densification in an area of tourism value or natural heritage will automatically reduce its potential.	SDF/EMF	Residential	The draft District Plan makes it very clear in its range of different development guideline statements that densification needs to be applied dependent on local area context and as a result will vary widely in application. This area is no exception and densification has to be particularly carefully considered.
	We seek clarification of the term "proactive enhancement of development rights". These should be considered on a case-by-case basis depending on the nature of the area and the impact of these rights on the rights of other people that live in the community, and the rights of nature. Please be more specific here regarding under what circumstances enhancement of development rights would be applicable. CoCT should not only consider visual impact and sea level rise here, but also the SDGs (Sustainable Development Goals).	SDF/EMF	General / Other	Agreed.
	MSDF Vol 1: Page 156 (Policy 23) "Support incremental land use intensification provided by the Municipal Planning By-Law to secure a 2nd & 3rd dwelling unit per Single Residential Zoning 1: Conventional Housing (SR1) zoned erven". There is tension between this statement and the building lines as dictated by the MPBL. The wish to densify should not lead to automatic support for building line encroachment. It should be clarified in this policy statement that the owner/developer needs to exhaust all possibilities to build these extra dwellings without encroaching the building lines before requesting an exception under the MPBL.	SDF/EMF	New Dev. Areas	Noted. However, this detail is already incorporated into the MPBL in terms of existing rights and restrictions that may be exercised, and its inclusion into the District Plan amounts to unnecessary extra bulk in this report.
	Southern District SDF Vol 1: Page 12 (3.1.3.3 Avifauna): The oystercatchers that nest on Noordhoek long beach at the lagoon next to the Kakapo wreck should be mentioned here under the important roost and breeding sites. CoCT should work together with SANParks to protect areas where important populations of non- or less threatened species are under pressure because of escalating human activity, such as oystercatchers, flamingos and terns on Noordhoek Beach. These should be mentioned separately from the population at De Kom. Protection should be given to species within the city's boundaries, instead of focusing on the protection of remote nesting areas.	SDF/EMF	Environment	This information will be fed through to the Environmental management Dept for recommendation to include in its info base - and may as a result be included into the Baseline report (Vol.1). However, this info will not have any material impact on the proposed development guidelines (& associated maps) in the current draft District Plan Technical Report (Vol.2) which is the report to be statutorily approved.

Southern District SDF Vol 1, Page 12 (3.1.3.4 Amphibian fauna): The comprehensive assessment mentioned needs to be done as part of the EIA. With the Houmoed extension the EAP suggested that the assessment/study should be done after approval, which is absurd. The reference to a "comprehensive assessment" is too vague - this needs to include mention of amphibian experts that do a population study over 5 years, check water, noise, and pollution levels, study impact of surrounding traffic and impact on the broader biodiversity in the area. A full habitat study should also be conducted. All mitigation and adaptation need to be tested for efficacy as part of the study. Two additional areas important for the Western Leopard Toads not mentioned here are Milkwood Park and Sun Valley. Importantly there should also be building specifications that are toad proof. Fencing with access holes, swimming pools that are raised or have beached sides.	SDF/EMF	Environment	Such comprehensive env assessment is absolutely part and parcel of the requirements of any EIA. Additional to this - on the policy side the draft district plan does now also include additional development guidance relating to fauna in particular (eg. frogs and baboons).
Southern District SDF Vol 1: Page 30 (table 16): policies column is empty	SDF/EMF	General / Other	Noted. This will be addressed (bearing in mind that Vol1 is purely an informant document and the focus is now almost entirely on ensuring the Vol.2 report to be approved is as good as possible).
Southern District SDF Vol 1: Page 31 (figure 18): The urban and coastal edges in the beach area of Noordhoek are not clear in figure 18. It seems as if the urban edge is going around erven 4833 and 4834, while both are outside the Coastal edge. This is not possible for obvious reasons. All erven outside the Coastal edge cannot be within the Urban Edge. As mentioned above in the comment for page 77 of the MSDF Vol 1, the Coastal Edge should be extended to include Docke's Farm (Erf 4835, Chapman's Peak) since it falls within the area at risk of flooding.	SDF/EMF	Development Edges / STAs	In principle agreed. The Coastal edge in this area (where it is at odds with the urban edge by 'extending an arm into the wetlands') has been identified as problematic and this matter is being addressed. The problem here is that the coastal edge is approved not just by the City but also by National Govt into the ICMA, and so now will require a very lengthy process to amend.
Southern District SDF Vol 1: Page 32 (figure 19): Docke's farm (Erf 4835, Chapman's Peak) should be added to the list of "areas of agricultural significance and be labelled with a brown edge, similar to Cape Point Vineyards. Also, Noordhoek has many smallholding plots, which are essential to the equine lifestyle and of which some are being used for small scale farming of vegetables. The local production of vegetables is expected to increase with the increasing effects of climate change and the reduction in food security. These should be demarcated as such on the map so that they can be treated as the asset that they are.	SDF/EMF	Environment	Areas identified as 'areas of agricultural significance' in the District Plan (& MSDF) are an information layer received from Dept Agriculture Western Cape resulting from periodic assessments of what constitutes such across the municipal area. This site was not included (ie. identified as of agric significance) in the last assessment made (in 2017), whereas the Cape Point vineyards area was (& was also in the earlier 2008 assessment). See below for further response on Docke farm. Re- equine and vegetable smallholdings areas within the urban edge the draft District Plan has recognised these as an equestrian / equine area of significance and recommended that further subdivisions within this area generally not be supported.
Southern District SDF Vol 1: Page 33 (3.4.1.1): Missing reference to the migratory routes between mountain and wetland as well as between the various parts of the national park. These are being increasingly cut off for transition of wildlife. Additional corridors must be created to allow wildlife to move between mountain and wetland (landscape is experiencing increased fragmentation), and also the roads are a death trap for them so the corridors need to be wildlife friendly with wildlife crossings and connective zones.	SDF/EMF	Development Edges / STAs	Additional corridors cannot be cadastrally created other than along existing open space areas. However, the point is noted and development guidance has been reviewed to try address this important issue (re-appropriate guidance on private properties). See Development Guideline 18 in Far South sub-district guidelines.
Southern District SDF Vol 1: Page 33 (3.4.1.2): Missing reference to uncontrolled usage of wellpoint and borehole resources that is leading to depletion of groundwater resources. Developments that risk impacting aquifers should be avoided. Missing reference to uncontrolled damming of streams and rivers for irrigation leading to depletion of wetland recharging like in De Goede Hoop Estate. This places significant pressure on the biodiversity and wetland during droughts which are likely to become more frequent.	SDF/EMF	New Dev. Areas	These are all management related issues and beyond the scope of this policy - excepting for broad statements re- sustainable development generally.

Southern District SDF Vol 1 Page 34 (3.4.1.3.v): Missing reference to: - the increased risk of fires as a result of climate change and the increased fuel load of alien vegetation that will lead to bigger and more intense fires - increased poaching of wildlife in coastal wetlands (Noordhoek wetlands point in case) and specifically around informal settlements - Marine animal poaching and plant poaching - Roads that intercept wildlife corridors and subsequent road-kill/animal mortalities - Noise and water pollution that impact the wildlife habitat and ability to breed and survive - Land borne sewerage and litter that enter the ocean - Use of poisons like Glyphosate that has a devastating impact on humans, but also on animals and the wetland (Wilkinson, 1999)	SDF/EMF	Environment	Most of these are management related issues and beyond the scope of this policy and needing to be dealt with elsewhere. The draft district plan does now place considerably greater emphasis on development 'resilience' in view of greater climate change risks.
Southern District SDF Vol 1: Page 39 (4.1.2): The document should mention the restrictions of local area overlays that form part of the MPB-L. The document must mention that subdivisions affect what the land can be used for. City animal by-laws dictate that a property must be at least 4 000 m2 for horses to be held. The equine economy is a major component of the Noordhoek economy.	SDF/EMF	New Dev. Areas	The draft District Plan does now make specific reference to the link to the MPBL overlay restrictions. And does also make provision in guidelines for the equine economy.
Southern District SDF Vol 1: We strongly object to the categorisation of the Noordhoek sanctuary, the open horse fields on Silvermine Road (erf 4744 and 4745-RE, Silvermine Road) and Phase 8 of Lake Michelle as "Underutilised". These areas fulfil important social and ecological roles in the Noordhoek valley. The term "underutilised" is dangerous, anthropocentric and subjective.	SDF/EMF	Urban Development	It is noted that these areas perform useful functions. However, these are private land holdings inside the urban edge with no or little particular biodiversity significance that obviate enhanced urban development rights assuming appropriate associated development guidelines. These are no different to most other now already privately owned urban development areas.
Southern District SDF Vol 1: Page 60 (5.4.4.1): Differentiation should be made in the Houmoed extensions phase 1 and phase 2. While phase 2 can be argued to be relevant, while Houmoed phase 1 was planned to alleviate congestion as a result of works on Kommetjie road, but this has since been completed. Instead it will have a devastating impact on the wetland and its fauna. The alternative, which is to open up Sunnyside Road is more cost effective. Why is this not mentioned as option?	SDF/EMF	Environment	Houmoed Road phase 2 extension is proposed not only as an important traffic relieving route to support Kommetjie Road, but now (almost more importantly) also as a mechanism to control / limit northward encroachment of informal settlement into the wetlands. This matter is almost out of control despite the best intentions and actions of the City and requires absolutely urgent attention as a priority development.
Southern District SDF Vol 1: Page 60 5.4.4.2 if OuKaapse Weg will be widened then tunnels for wildlife will have to be created in order to meet the requirement of providing pathways between various sections of TMNP as stated in the MSDF policies.	SDF/EMF	New Dev. Areas	This is a detail matter to be dealt with through the development process itself if & when it ever materialises.
Southern District SDF Vol 1: Page 85 (Table 5.6) It cannot be stressed enough that the MPBL already allows for densification through the second and third (SR1) dwelling provision. The density guideline correctly points out "provided no external departures are required". No further development of open areas should be allowed as these are crucial to the population of Cape Town. Too often the densification policy is abused (unfortunately successfully) to allow for subdivisions that are applied for purely for financial gain – since no densification is achieved, or for departures, when alternative designs allow for densification within building lines. Both these abuses must be addressed in the policy in order to prevent senseless subdivisions and infill.	SDF/EMF	New Dev. Areas	Noted. The policy does its best to address this matter. The district plan is clear on recommending future protection of important open space areas. The policy also provides development guidance to address appropriate future subdivision circumstances associated with the exercising of MPBL provisions (re- 3rd dwellings as of right).
Southern SDF Vol 2 Page 21 (figure 8): Cape Point Vineyards (CA-934-1-RE) and Docke's farm (Erf 4835, Chapman's Peak) are not mentioned as agricultural zone, while these are key agricultural areas in Noordhoek. Please amend.	SDF/EMF	New Dev. Areas	Cape Point Vineyards is recognised as important agricultural area (ie. agric area of significance). However, Docke farm is not (see responses elsewhere for explanation in this regard).
Southern SDF Vol 2: Page 25 (figure 10) We have the following comments on this figure (see also the attached section included below): The Coastal Edge should be extended to include Docke's Farm (Erf 4835, Chapman's Peak) since it falls within the area at risk of flooding. See the map that we referenced in our comment on page 77 of MSDF Vol 1	SDF/EMF	Development Edges / STAs	Noted. See elsewhere for response in this regard.

	Southern SDF Vol 2 Docke's farm (Erf 4835, Chapman's Peak) is an area of agricultural significance and must be labelled as such in the map, being one of the few remaining working farms in the valley. It matches the criteria mentioned on page 34 "High potential and unique agricultural land include areas that have been ploughed for orchards, vineyards, forestry plantations, annual crops, pastures and irrigations lands. Intensive agricultural land shall be protected against conversion to other land uses, particularly urban development, unless otherwise argued in the district plan."	SDF/EMF	Development Edges / STAs	Areas identified as 'areas of agricultural significance' in the District Plan (& MSDF) are an information layer received from Dept Agriculture Western Cape resulting from periodic assessments of what constitutes such across the municipal area. This site was not included (ie. identified as of agric significance) in the last assessment made (in 2017), whereas the Cape Point vineyards area was (& was also in the earlier 2008 assessment). Although this farm has been in existence for many years, from a district spatial planning perspective it is not considered an area to necessarily protect as agriculture area into the long term future. It is outside the urban edge but within an essentially wetlands area (the 'Noordhoek wetlands'), is itself substantially wetland area, and is surrounded to the east, west and south by proclaimed Cape Peninsula Floral Kingdom World Heritage Site buffer areas. Area south and east of the site is owned by SANParks and CoCT (& the latter managed by SANParks). As such Docke farm may continue into the future as farm area but may be more appropriately conservation area.
	Southern SDF Vol 2: The urban edge is incorrectly going around erven 4833 and 4834-RE, while both are outside the Coastal edge. If this is related to the colour of the line then this should be drawn more clearly. It is technically not possible to have an urban edge that extends further seawards than the coastal edge. As clearly stated in the Coastal policy on page 29 "No urban development seaward of the coastal edge line unless it enhances public amenity and recreational value and that such development is consistent with the principles and objectives contained in the Integrated Coastal Management Act.". Further, on page 63 "Land on the seaward side of the coastal edge line (i.e. within the Coastal Protection Zone) should not be used for any urban development normally associated with, and accommodated within, city development."	SDF/EMF	Development Edges / STAs	Noted. See elsewhere above for response in this regard.
	Southern SDF Vol 2: There is no "existing urban development" to the East of the Urban edge on the mountain side (mistake in the map that must be corrected)	SDF/EMF	General / Other	Agreed. This has been a mapping issue (here & numerous other areas) taking time to resolve - but has now been attended to.
	Southern SDF Vol 2: Why is the open horse field in Noordhoek (erf 4744 and 4745-RE, Silvermine Road) designated as New Development Area? While the Generations school was approved against the wishes of the community it should not automatically lead to the remainder also being developed. This open field contributes directly to the character of the area. Furthermore, current densification allowances within the MPBL already allow for considerable densification without the need for sacrifice of more open land. We would like erf 4744 and 4745-RE to be removed from the list of NDA	SDF/EMF	Urban Development	This entire site has long been identified as future urban infill area - with only a part thus far having clarity re- future actual urban development. This is merely one of the last urban (infill) development areas in this valley area - with all (or almost all) existing urban development having been similar privately owned areas which are now urban development occupied by current Noordhoek residents. The current guidelines argue for appropriate future development respecting key issues in relation to the site.
	Southern SDF Vol 2: Why is phase 8 of Lake Michelle designated as New Development Area? The development of this piece is extremely contentious from an environmental point of view and is opposed by residents of Lake Michelle and Noordhoek. The reason for this opposition lies in the natural value of this piece of land and its importance as a passage of all water coming from the Houmoed ponds through Lake Michelle and into Papkuilslei (Docke Farm). SANParks in their comment (Vol 4 appendix 13) support this as well. The unique environmental value of this piece of land should not be sacrificed for another 100 dwellings.	SDF/EMF	Environment	This is currently subject to a detailed application process. The 2012 approved policy, as well as the draft 2022 District Plan, identify part of this site as urban development area and the remainder as wetland area and propose any future development accordingly.
	Southern SDF Vol 2: How is it possible that there is a New Development Area next to Masi outside the Urban Edge that extends into the Noordhoek Wetland? We realise that this is where shacks have been built illegally, but that does not automatically mean that it should become a NDA.	SDF/EMF	New Dev. Areas	]
	Page 28 (table 5) The Noordhoek Wetlands and Papkuilslei should be listed under "Rivers, wetlands and their associated buffers"	SDF/EMF	Environment	This could be an amendment. However, it is made quite clear here that the areas mentioned in this section are merely Examples - & quite clearly this list can not be comprehensive here.
	Page 93 (figure 18): Same comments as for figure 10. The coastal edge has been omitted in the figure but is crucial in the context of other information on the map	SDF/EMF	Development Edges / STAs	Noted. See elsewhere above for response in this regard.

	Page 96 (supporting development guideline 14) The text leaves too much room for development to take place outside the coastal edge. Table 5.4 of the MSDP clearly states: "Urban development is precluded from the seaward side of the coastal edge in instances where coastal processes and the need to protect sensitive coastal ecosystems are the primary informants for which the position of the coastal edge has been defined for a specific area."	SDF/EMF	Development Edges / STAs	Guideline 14 does not refer to 'urban' redevelopment. Moreover, as acknowledged there is already other development guidance (in the MSDP - & District Plan) which clearly states 'no urban development seaward of the coastal edge'. The fact is there is already development seaward of the coastal edge, including recreational facilities mainly (inclusive of toilets, parking lots, club facilities, restaurants, footpaths etc. which will undergo redevelopment at some point. This guidance (in 14) is thus considered appropriate.
	In our opinion guideline 14 should clearly underline the MSDP policy that residential development outside the coastal edge is not possible. Re-development of existing structures could happen under the limitations stated: "Any redevelopment within the identified coastal flood risk areas must address potential flooding associated with predicted sea-level rise and increased storm-surge action, as well as windblown sand issues where this applies."	SDF/EMF	Environment	This would merely be (unnecessary) repetition.
	Page 96 (supporting development guideline 17). What is meant by "Development on adjacent properties should be encouraged to assist with the former (re- setbacks, street furniture etc.)." ? This text seems to encourage development on adjacent properties, which should not be the intent. We propose to change the text to: "Development on adjacent properties to scenic routes should support the former (re- setbacks, street furniture etc.)."	SDF/EMF	New Dev. Areas	This refers to properties adjacent to quality stopping areas where appropriate (in urban areas for coffee shops, restaurants etc., and in non-urban areas viewing site stops), as well as improvements for cycling and walking (on the roads themselves). However, this concern (about potential misinterpretation) is noted, and the text has been amended to minimise / remove any potential misinterpretation.
	Page 98 + 99 (r. Noordhoek Silvermine specific comments : See attached table submitted as part of the original comments. Key comments relate to recognition of Noordhoek as 'destination place', opposition to possible future urban development on (between) the Noordhoek sportsfields site, and acknowledgement and accommodation of the 'equestrian economy'..	SDF/EMF	Environment	Noordhoek is indeed essentially a destination place, but this relates to the area generally and not one particular focus area or site. There are similar situations in many other suburbs (eg. Constantia, Muizenberg) but these are also not identified specifically as such. Part of this is having a generally consistent approach, and also balancing site identification in this district with (the general relative paucity in most) other districts. The point was made in the public meeting and elsewhere that restorative justice is a key issue in Noordhoek in relation to historical forced relocation of many from this area - and the question in return that 'if not here then where else'? Further liaison and engagement and investigation is required on this matter into the future. The equestrian economy is now explicitly acknowledged and accommodated for in development guidance for this area.
179	I strongly disagree to densification.	SDF/EMF	Residential	The District Plan (& MSDP) is quite clear, as is also the case in the approved 2012 District Plan, that in areas targetted for future densification and intensification substantial change to urban form is encouraged - notwithstanding natural and heritage environmental and other informants and constraints. However, it is desirable and entirely possible that the best current character elements are retained but that the future emerging character is in fact better than that currently. The city will continue to grow - & concentration in optimal locations brings increased local and wider area benefits. Clearly, however, in historically valuable areas appropriate development sensitive to context is a very important issue. The adequate provision of sufficient infrastructure is also a key issue and plans for this are prepared and periodically revised according to available city resources and changing needs and imperatives.

180	I write to express my concern about the increasing densification of Wynberg. I object in particular the erection of so many soul-less blocks of flats that have absolutely no garden areas, very limited on-site parking, not even proper balconies, and which about the neighbouring properties with no offsets.	SDF/EMF	Residential	This policy is quite clear, as is also the case in the approved 2012 District Plan, that in areas targetted for future densification and intensification substantial change to urban form is encouraged - notwithstanding natural and heritage environmental and other informants and constraints. Substantial parts of Wynberg are located in just such an area. However, it is desirable and entirely possible that the best current character elements are retained but that the future emerging character is in fact better than that currently. Re- heritage matters - this argument could also be applied to the City CBD (city bowl) area. However, the city will continue to grow - & concentration in optimal locations brings increased local and wider area benefits. Clearly, however, in historically valuable areas such as Wynberg appropriate development sensitive to context is a very important issue.
181	Please reconsider your densification plan for Wynberg there are other less populated suburbs we are saturated people. Personally I call Wynberg little Africa. People come from the whole of Africa and live here. That's not a problem for me but living 10 or more on one property is.	SDF/EMF	Residential	This policy is quite clear, as is also the case in the approved 2012 District Plan, that in areas targetted for future densification and intensification substantial change to urban form is encouraged - notwithstanding natural and heritage environmental and other informants and constraints. Substantial parts of Wynberg are located in just such an area. However, it is desirable and entirely possible that the best current character elements are retained but that the future emerging character is in fact better than that currently. Re- heritage matters - this argument could also be applied to the City CBD (city bowl) area. However, the city will continue to grow - & concentration in optimal locations brings increased local and wider area benefits. Clearly, however, in historically valuable areas such as Wynberg appropriate development sensitive to context is a very important issue.
182	As a resident of Wynberg I would like to express my concern with regards to the state of Wynberg. Wynberg is undergoing tremendous strain currently on all fronts. The roads are in disrepair full of potholes and is causing damage to vehicles. This is because upgrading is not taking place and the traffic is just becoming heavier and causing more problems. The residents of Wynberg has to take on the task of protecting Wynberg's heritage, keeping Wynberg clean, and keeping their properties and their families and their businesses safe. We need the City to help us to preserve Wynberg for the generations to come and get it back to its previous glory. Densification would be the further nail in the coffin.	SDF/EMF	Utility Infrastructure	This comment suggests that densification is a very bad idea due to existing poor infrastructure in the area, and also that significant heritage loss is likely. The City has long been aware of public investment plans for different parts of the district (& city) and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address urban growth and densification.
183	As a resident of the area, I find the city's intention to encourage single residential in an area that effectively works as a suburb because of the healthy mix of single and general residential worrying. The area works. If the city allows too many flats the area will no longer work and will turn into Wynberg or Woddstock, areas that do not work with massive social issues. The current blend in this area works. If the city need to develop land the city need to use their own land and give that development rights. There is so much land earmarked for road widening with no road widening planned. These properties must be developed either sold with large rights awarded by the city or developed as public private partnerships. The city should rezone the Claremont bowling club and allow the owners to develop, another unused underutilised parcel of land. Sort out district six, develop it. The city need to focus their energy on their own and provincial land. Don't destroy a perfectly good area.	SDF/EMF	Site Specific	Noted. These matters are being picked up through other processes. This policy report can do no more than recommend what development is optimal in future.

184	I wish to take this opportunity to comment on the recent proposal and highlight some disturbing issues. The developers are hunting and exploiting quiet residential areas and putting up various types of developments from care homes and Multi small apartments and townhouses. This is not densification for the poorer under privileged masses seeking to find homes in safer areas with less crime and drugs etc I wonder how much thought has gone in to these processes and densification is used in a wide form and is not specifically geared to creating what is necessary...I wonder how much thought is given to overburdening already overloaded infra structures with additional water electricity and waste disposal with all these unnecessary additions. The thought process behind the people in authority rubber stamping these applications gives some serious concern as to how they are thinking of the burden to the future infrastructure. I am sure that the purpose and original thought to this programme was not to do what is being done but to supply more affordable housing\accommodation to the masses not for the planners and developers to line their pockets with these small overzealous overcrowded overpriced establishments they are erecting wherever they see the gap.	SDF/EMF	Urban Development	The City has long been aware of public investment plans for Wynberg and the likely implications of private development response, and has been planning accordingly. However, given increasingly limited resources, City depts cannot commit infrastructure spend too far in advance of planned development responding. The City is increasingly attempting to align and prioritise infrastructure spend to address this matter, and Wynberg is a key area in this regard - & has been proposed as one of only a few DFAs (Development Focus Areas) across the city to highlight and guide future public investment .
185	DTPW to be consulted should any development take place regarding R300 Southern Extension Planning and any other project which may impact Proclaimed Provincial Roads	SDF/EMF	Transport and Route Desgn.	Noted.
185	Appreciate that comments from 2021 have been taken into account and changes made re- the DFA extent and heritage related statements for this area. Only comment is adjustment to positioning of place names on some maps need adjusting.	SDF/EMF	Residential	Noted. Maps have been amended accordingly.
186	Endorse GEESE comments on Glencairn area by Gill Naeser	SDF/EMF	Environment	Noted. See responses made to Gill Naeser comments.
187	Seeks clarity on the whether (& how) the MSDP and District Plan are addressing the impending critical issue of Polyphagous Shot Hole Borer Beetle impact in the city and district area	SDF/EMF	Environment	Noted as a concern of substantial potential impact, but this is not within the scope of this policy on future development planning for the city and district. Email was forwarded to Env Management Dept for its attention
Nr	Comment summary/contents	District Plan Overall Theme/ Common Concerns	District Plan Sub theme	Response
188	SARDA Support' group became aware that the Constantia Residents & Ratepayers Association (CRRA), has made submissions to the City in relation to planning matters in Constantia, without conducting any public participation with residents, or informing CRRA members that it is making these submissions. Letter attached from 'SARDA Support' outlining concerns and requesting the City to revoke the CRRA Submission from consideration for purposes of the Draft MSDP 2022. Also attached is 'SARDA Support's' objection letter to the Draft MSDP 2022 proposed plans for SARDA - which contains a list of the 160 residents who were members of 'SARDA Support' as at 30 August 2022.	SDF/EMF	Urban Development	The SARDA site was identified in the 2012 Southern District Plan as a NDA. The 2022 draft's development guidance is essentially unchanged - that part of the site be developed at low-medium density. The City won't revoke any of CRRAs comment as any party has the right to submit any comment. The City subsequently met with concerned representatives for the 'SARDA Support', and this meeting concluded in improved understanding of the context and in-principle support for the draft DSDP development guidance for this site. <i>(commenter responded to on 7 Sept 2022).</i>
189	Response to SARDA Support (copied to City) that CRRA has remained in contact with SARDA Support (including regular meetings). CRRA opposed to any densification on SARDA site. Thus CRRA submission was taken out of context.	SDF/EMF	Urban Development	Noted.
190	Late comment as just heard that apparently Mayor not supportive of the draft Masiphumelele SDF, & as a result request Sunnyside Structure plan not be withdrawn until such time as problem with Masi SDF is resolved.	SDF/EMF	Urban Development	Information on Mayors problem with the Masiphumelele SDF is incorrect. Instead, officials decided to hold draft Masi SDF in abeyance until confirmation of inclusion of an urban edge in the MSDP. Once MSDP approved the draft Masi SDF will be submitted for approval. <i>(commenter responded to on 6 Sept 2022).</i>

Integrated District SDF and EMF Review: Comment on March 2021 Drafts

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_1.1	District SDF & EMF; & Sub-District	Environment open space / GIN	Our ideas of revitalising the Alphen Farm Estate by way of a subsidiary and complementary development on the 'silo precinct' have been ignored.	Rather than ignored - the proposed ideas (of revitalising the Alphen farm estate) were/are not considered in principle a matter (re- specific developer detail) for direct inclusion in the draft DSDF. A related question is therefore whether or not the draft DSDF development guidance expressly opposes such an idea being converted to a development application (e.g. would such an application require a deviation from the new DSDF?). The revised draft DSDF will be re-considered in light of this question as per whether any amendments to the draft are required.
S_1.2			The existing residential development rights of the silo properties have been diluted by the draft SDF designation of "other open space"; The previous SDP indicated these properties as urban development.	The GIN informant needs amendment to ensure the erven are designated as 'urban development' instead of 'open space'.
S_2.1	District SDF & EMF; & Sub-District	Transport	How is the Bicycle Masterplan, the Cycling Strategy and NMT policy / network to be reflected in the SDFs?	All City policies not referenced in the report due to massive replication & lengthening of the report - but this could be reviewed.
S_2.2			Important to have these higher order NMT routes and priorities reflected on each map and colour coded into the key reflecting the prioritisation of people movement as a key spatial informant.	NMT policy directives are included in the district SDF guidelines (as they relate to development) - but the network wasn't included in the SDF map as so complex it would require its own map. However, could review this to include highest order routes only in district & sub-district/s.
S_3	General SDF	General	What is the status & progress of the District Spatial Plan?	The 2012 approved Southern District Plan will remain the applicable policy until such time of the reviewed draft SDF being approved.
S_4	sub-district	Constantia	Object about the "Nirvana Park Development" that is proposed in the Constantia Cumberland Avenue area. I live in that area and any development of such housing will seriously affect every one, s home value in that area.	(see response for S_5)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_5	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' (erven 1207-re et al of ±1.5ha adjacent to/ behind Constantia Village) on environmental grounds (fauna, flora, trees, etc) when much vacant & under-utilised land elsewhere in the city.	The policy proposal is not any approval of any development. It is a consideration for the future in lieu of its strategic location & other characteristics in its unique context. The open space area serves only a relatively small number of surrounding erven (30-40) & is thus comparatively large in context. All these erven are large (±1400-2400m²) so have significant private open space relief. The open space area is not of biodiversity significance apart from some trees (re- cultural landscape) which can / should be retained if any development were to occur. The site is not in a visually prominent location for more general public good (e.g. adjacent to a scenic route), nor is it part (or potentially) of a connected open space network (an increasingly important consideration). The proposal for some development of the site is that, additional to the above, the site is strategically located within an urban node and lends itself to being better utilised land. Being City-owned, well located, and comparatively under-utilised, is reason why a portion of it is recommended for some potential future residential development - which if it were to occur should be limited to providing residential opportunities (for middle &/or lower middle income - e.g. for teachers, nurses, retail assistants) which to date do not occur anywhere in Constantia. If such development were to occur it should only be such that it does not detract from, but could actually enhance, the open space qualities (e.g. orientation onto the space, addressing dead wall boundaries).
S_6	sub-district	Masiphumelele	Object to proposed housing on Solole land, due to increased prospects for crime, littering, taxi rat-running, backyard squatting, & rioting with Masi residents both sides of Kommetjie Road; & loss of green area & insufficient electricity services. Propose instead this area be an environmental education centre, & that flats for Masi residents be within existing Masi area.	Solole was originally purchased for housing & housing related development (ie. no distinction was made, or specific condition that it be only for support land uses). Comments are nevertheless noted, & attention will be given to ensuring suitably appropriate wording.
S_7	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_8	sub-district	Constantia	Query what 'medium density' housing means. Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_9	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as proposal flies in the face of the vision for the Constantia area. The park is also well used & valued.	(see response for S_5)
S_10	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_11	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_12	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_13	sub-district	Main Road; Kenilworth - Wynberg	Proposal for 'green-belt' type environment linking open space area north of Wetton Road bridge through to Wynberg station, involving greening restoration, re-purposing and re-orientation of buildings / properties under the bridge and along the railway towards Broad Road in Wynberg.	Supported in-principle but too great a level of detail for this district-wide framework.
S_14	sub-district	Far South	Too many housing developments have been allowed in the Far South. The road network can't cope. Perhaps best would be more low cost homes in places such as Ocean View instead of more homes for the wealthy in the valley.	There are significant urban infill areas which have long been identified for development - and accommodated in long term roads planning in the valley - and which are progressively being developed over time. However, the Far South is not an identified / targetted future growth area of the city. It is a focus of the revised draft District SDF that future housing development in the Far South (& indeed district as a whole) should include a wider range of housing options / opportunities than the historical predominance of middle to upper income housing.
S_15	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_16	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_17	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_18	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_19	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_20	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_21	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_22	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_23	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_24	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area. Suggest more approp site is Kendall Rd area undeveloped sites	(see response for S_5)
S_25	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_26	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_27	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_28	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_29	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_30	General SDF	Housing	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.	While things are of course not as simple as one may make them out to be you certainly make a valid, noteworthy, & valuable point. And I would like to believe we in City planning generally agree – at least in principle – with the sentiment / approach. How this transpires into action is however a real challenge. But I hope some of the policy statements in these reviewed 1 st draft SDFs do begin to speak to this. And there is in fact 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. But it is a start ...
S_31	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_32	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_33	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_34	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & support the existing lifestyle of the area.	(see response for S_5)
S_35	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_36	General SDF	Sustainability	Crucial bits to SDF missing. Need to acknowledge all international commitments: 2030 Agenda for Sustainable Development & the 17 SD Goals; The New Urban Agenda giving guidance to SDG11 Sustainable Cities & Communities: & various others (see comment). Sustainable dev needs (greater) community involvement - & recommend charettes to workshop solutions. See 'Cities of the Future 2030' info for further info & support.	Noted. However, it is not the place / function of a district level spatial development framework to include this sort of information. These references, acknowledgements and directives belong in citywide development related policy (ie. including also environment, energy, sustainability, resilience etc city policy).
S_37	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_38	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_39.1			More cemeteries required.	Noted. And this is a significant issue in the largely completely developed Southern District in particular. However, this is dealt with in other policy dealing with long term city cemeteries planning.
S_39.2			More community agriculture spaces required. Market gardening in Pollsmoor Prison area, Hout Bay, Constantia, Porter Estate, Noordhoek & Kommetjie. Create more green spaces in Retreat, along Klipfontein Corridor. Upgrade existing Parks with fruit trees, public toilets & showers, & fynbos. Create more buffer areas along coastline. Reduce buffer 2 areas to decrease separation of high & low income households.	The draft DSDF is supportive of this, and will seek to opportunities in the draft to better incorporate this objective than is currently the case.
S_39.3			Make Klipfontein corridor more accessible to pedestrians, buses, horse-and-carts, and cyclists.	The NMT policy statements are broadly supportive of this. And detailed planning of MyCiti for Klipfontein corridor will look at the detail of incorporating this better than is currently the case.
S_39.4			Invest in low cost housing in winelands, Kenilworth, Newlands, Rondebosch. Formalise Hangberg, IY & Masiphumelele.	Agree in-principle. And to this extent the city is preparing an 'Inclusionary Housing Policy' towards realising this. Additionally, there are already identified restitution sites within these areas to address formerly disposed households (which broadly - but not exclusively - comprise lower income households). And finally, there are other identified urban infill sites / new development areas (NDAs) for which lower income housing is recommended (either alone or as part of a residential mix or other mixed use).

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_39.5			Include outdoor gym & cycling paths at Rondebosch Common	Noted. Disagree that an indoor gym be included here as this is a heritage area, and indoor gyms can be adequately accommodated in the surrounding urban area. There are currently paths around the Common, however, agree that these should be improved - & will ensure that this is appropriately included into the DSDF.
S_40.1			SDF well written generally. Support that more affordable housing & econ opportunity is needed in the Far South generally. Counter NIMBY in Far South with further detail studies (e.g Transport cited as problem re- allowing more dev but the taxi industry appears to respond quickly & adequately).	Noted. A detailed transport study for the Far South was completed 2 years ago which is guiding prioritised transport improvements for the valley. The draft DSDF needs however to review and consider what development guidance to provide for the rail connection between Muizenberg and Fish Hoek, and especially through to Simons Town.
S_40.2			The draft Masi LSDF needs to align properly to this SDF. Population of Masi needs to be capped (use of MPBL to control illegal structures). Need more accurate pop. Figure for Masi. Use available City land for needed additional social & community services in Masi & Ocean View. Need better law enforcement in Masi. Relax certain dev standards (eg. allow backyarders in masi but nowhere else; allow existing owners to rezone &/or dev / upgrade without requiring fees).	Alignment is to be improved where required and possible. As far as possible available data is informing the draft DSDF. The draft DSDF cannot include a 'capped population' for Masiphumelele. However, the Masi draft SDF and DSDF will seek to where possible better reflect the appropriate development guidance to assist with improved land use management in this area.
S_41			Supports comments comments by Sunnyside Ratepayers Assoc. on the draft Masi SDF.	Noted.
S_42.1			City planning) has an unrealistic 'rose-tinted' view of the future of the City in view of current/developing realities. The reality (more evident in the last few years than ever) is that (SA generally &) the City is moving towards bankruptcy re- an ever-diminishing tax base to support a burgeoning city of unemployed, uneducated/unskilled. City plans now need to address this properly.	Noted.
S_42.2			Process should have started 'bottom up' by consulting individually communities re- vision, how to dev a safe, caring, viable etc. city. Instead communities being 'told' what future should look like (& that no choice in this).	City did start (after baseline info updating) with consultation with communities on what key issues / concerns etc are (incl. public meetings & invitations to submit comments). City does nevertheless also have wider imperatives & challenges to address - so a balanced response/proposed SDF has to be achieved. Having said this, there are lessons to be learnt - & 1 is that more consultation with communities is required - which should occur throughout the 10 year period between DSDF approvals.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_42.3			It is noted that despite being (for a long time) a targetted growth area the Main Road corridor has not grown. This is due to the high cost of growing / densifying here & the reality that this would have little impact even if it did happen at scale. I.e. the economic realities over-ride the (social) planning wish. what is required is development in high-density informal areas, not relocation of these residents to lower density areas where accommodation unaffordable & impact on character high - which may /will lead to flight of the more affluent.	Noted. The appropriate development guidance in the district and city is not any one response. What is required from a spatial development guidance perspective (ie. in the draft DSDF) is a suite of development guidance to enhance (re-)development in both 'attractor' (high opportunity) areas (such as Main Road corridor) as well as in 'generator' (low opportunity more peripheral and predominantly residential) areas.
S_42.4			Medium-density (treed 'green-lungs') area does much to decrease risk of climate change for the City. Should not be sacrificed to social engineering. Dev (intensification) should be limited to econ hubs. Infill sites should be developed soon. Also verges should not be hardened; private gardens preserved as green space contribution (re- coverage limitations); artificial grass limited;	Greater resilience to climate change issues in the city is increasingly important, but should not be conflated with density or 'social engineering' (bearing in mind that many parts of the Southern district area were formerly the subject of deep and very painful social engineering). The thesis is more about supporting the development of a more efficient, better performing, more liveable urban environments within a rapidly growing high order city of South Africa that result in improved livelihoods for residents and visitors alike..
S_42.5			Support opposition to subdivisions & thence densification & change in character. Support overlay zones for areas with distinctive character. Densif changes character & reduces property values.	Agree that overlay zones, or similar mechanisms, are appropriate and desirable in certain areas to maintain and enhance area character. However, it is likely that the character of most areas of the city could & should be enhanced through re-development - of different nature and form in different areas - which generally will result through increased density. Certainly, in higher access parts of the city the imperative for realising greater opportunity through higher density can greatly enhance areas (as is being witnessed in many areas which require certain population thresholdsto realise certain benefits). There is also no evidence to suggest property values are negatively affected by high density if appropriate development occurs (again as evidenced in many more mature high opportunity areas of the city).
S_42.6			Implementation: Doubt ability for major capital spend possible into future. Concern that Main Road widening being abandoned as will adversely effect BRT etc. & rail (when working) already at capacity. Must enhance Main Rd corridor for BRT to take over from rail. An efficient commute much cheaper to provide than low-cost housing in confined & valuable spaces.	Noted, and agreed that this is an important new reality consideration. The draft DSDF hopes to better reflect this reality and revised objectives accordingly in the revised development guidelines. This is also now increasingly being reflected in other line function planning (e.g. transport planning for more 'incremental' approach to MyCiti provision than the former blue-print big-bang approach which is becoming increasingly unaffordable and taking far longer to implement than originally thought).
S_42.7			Note severe wastewater infrast capacity issues in Bergvliet - Meadowridge. A concern.	Noted. However, to a degree this is an issue everywhere, and relevant infrastructure & service depts generally respond in a prioritised plan and programme to address this.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_42.8			Support control of business into residential areas. Proposed business activity be restricted to East side of Main Road & creep up E-W roads be prohibited.	In broad terms, agreed. And this may be a strong motivation to retain the Main Road Growth Management Strategy policy despite this now being quite dated. However, there is a general acknowledgement in planning (worldwide) that there should be a more away from a more formulaic 'blue-print' approach to planning (with very distinctive separation of different land uses) to a more 'performance-orientated' approach that supports better performing urban areas generally through permitting a greater mix of land uses as appropriate than was formerly the case. A good example of this is the embracing of CBD areas as not merely commercial centres (which are 'dead' at night) but inclusive also of residential which has resulted in greatly enhanced living, working, and recreational areas.
S_42.9			Implementation: Concern /oppose that Kendal & Ladies Mile roads identified for intensification. Ladies Mile ext proposed to Consort Rd should be shelved - as will create more congestion. Should retain road widening for Boundary Road.	Kendall and Ladies Mile roads are not minor internal residential roads but significant connectors linking many suburbs and communities and business areas. As per a comment elsewhere (s42_6 above) public transport should be enhanced and leveraged on routes where appropriate. Furthermore, a proactive (forward-looking) development policy should identify where future development opportunities lie which will enhance urban functionality, performance and liveability. The draft DSDF identifies these roads, along with a number of similar high-order routes elsewhere as such 'value-add' routes into the future.
S_42.10			Oppose expansion of mixed-use area around Meadowridge library area - as creep into residential. Disagree strongly to 'more inclusive & integrated neighbourhoods' as has never worked. Focus should be improved service delivery to an area anyone can live in - as they do.	See response to comment s42_8 above. Clearly carefully identified policy development guidance, appropriate to each different area based on area-specific context, is paramount. So too is follow up 'day to day' land use (and other) management. Apart from needing being forward-looking in identifying how to enhance functionality, performance and liveability, is that it is important that policy reflects changing needs, desires and requirements, and failing to do so may lead to development responses anyway (whether legally or illegally) which (without appropriate guidance) may result in inappropriate or inappropriately located outcomes.
S_42.11			Why Meadowridge node a Local & not a 'Neighbourhood' node? Concern with many statements of 'generally' & 'dependent on local context'. Will there be local area LSDFs to give more certainty? SDF-EMF doesn't seem to plan for shortage of schools. What is plan for CoCT land south of Meadowridge centre?	Meadowridge is identified as a local node as patently of a different order to High Constantia, Noordhoek village etc as reflective of Neighbourhood nodes. The DSDF drafting process has involved close liaison with the education dept - and also the CSIR (who have assisted the City and Province with facilities planning). Schools planning includes dept planning as well as (particularly - but not only in - in higher income areas) private sector response, which in more developed areas increasingly includes different format schools (e.g. limited or no sportsfields on smaller campuses).
S_42.12			SDF extremely voluminous! Not user-friendly. Seek a further participation process. Still support the draft Bergvliet Meadowridge Diep R SDF proposals.	Agreed, and the revised version (following comment received) is aiming to address this in a strong manner. This includes greater liaison with the dept responsible for the CTMSDF to ensure a more streamlined suite of planning policy eventually being submitted for approval.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_43.1			Ideal Live Work Play area. Need to reignite & diversify local econ, & town & navy, strengthen economy, reconnect via public transport, utilise under-utilised Navy/Armscor properties etc etc. - which is basis of STCA strategy	Noted.
S_43.2			Need to id & dev govt land - esp Navy. Need better public transport <u>requires improvement of metrorail</u> . Designation as 'tourism-maritime' growth node. Intro / improvement of NMT (paths & cycle) along corridor. Creation of better/specific dev control guidelines. Possible erection of Wind turbines above town. Remove Redhill settlement to Dido Valley. Provide additional storage dams in Redhill area. Upgrade sewage infrast.	Noted, and largely agreed, although what lies in the domain and responsibility of the draft DSDF has to be clear (i.e. it cannot address all issues). Generally the focus of the draft DSDF is on greater resilience and self-sustainability of different urban areas, and most particularly those more peripheral which originated as predominantly only residential areas (although Simons Town is an exception to this due to the harbour and Navy). The draft DSDF does make significant proposals that attempt to address public transport issues in light of current realities etc.
S_44	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_45	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_46	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_47	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_48	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_49	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area. Recognise need for more housing but not on open space	(see response for S_5)
S_50	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area. Also increasing traffic issues. City disregarding all planning.	(see response for S_5)
S_51	sub-district	Hout Bay	Great potential of Hout Bay being diminished by poor urban management - linked most particularly to the largely uncontrolled growth of IY and associated problems of very high unemployment and crime & grime. But also linked to many other problems in a highly complex microcosm area of South Africa.	Noted. Clearly implications for the revised SDF re- the constraint of general urban management issues on desirable spatial development visions and outcomes for the area - in as much as the former has to (unfortunately) temper the later. This is noted and results in some amendment to the SDF to acknowledge this and respond accordingly where appropriate.

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H_52			Reserve portion of Solole for use as a Safe House	Noted. However, to high a level of specific detail for the Southern SDF. This should rather be considered for inclusion in the draft Masi LSDF.
S_53	sub-district	Far South	Support inclusion of a Safe House in Masiphumelele into revised draft SDF	Noted. However, to high a level of specific detail for the Southern SDF. This should rather be considered for inclusion in the draft Masi LSDF.
S_54	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_55	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area and contradict the existing lifestyle of the area.	(see response for S_5)
S_56	sub-district	Constantia	Utilise informal labour (e.g. homeless) to assist with clearing windblow sand from Simons Town railway, or cleaning beaches	An urban management (rather than a SDF related) issue, so can't be addressed by this policy.
S_57	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area and contradict the existing lifestyle of the area.	(see response for S_5)
S_58	District	General	Child-friendly & geneder-sensistive cities: urban planning & development must take gender issues into consideration during planning & project implementation. Gender equality should be a priority (SDG 5).	Noted.
S_59	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area, contradict the existing lifestyle of the area & create environmental & social problems	(see response for S_5)
S_60	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_61	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_62	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_63	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_64	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_65	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_66	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_67	NDA	Noordhoek	(see attached) Erf 4743-RE. Development guidance pertaining to Silvermine Road NDA to be revisited to align with what the new DSDF envisages for the neighbourhood node. Guidelines encourage, amongst others, level 4 and 5 community facilities (a portion, Erf 4734-RE is within 400m of the node)	Noted and agreed. The draft DSDF will attempt to better reflect new realities and imperatives in this NDA area.
S_68	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_69	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_70	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_71	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_72	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_73	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_74.1	General SDF	Environment open space / GIN	environmental protection & care- the City needs to commit to achieving the sustainable development goals by 2030	noted
S_74.2	General SDF	sustainability	Innovative urban projects - sustainability	noted
S_74.3	General SDF	water & sanitation	Urban water management	noted
S_75	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area.	(see response for S_5)
S_76	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would destroy this	(see response for S_5)
S_77	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would destroy this	(see response for S_5)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_78	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would destroy this	(see response for S_5)
S_79	General SDF	Urban Food & Energy security	The City need to comply with the Agenda for Sustainable Development 2030 (see attachments)	noted
S_79.1	General SDF	Affordable Housing	housing a major crises in the world- specifically affordable housing. Current housing model unsustainable. We need to rethink our approach to the housing crises- see examples in other countries	noted
S_79.2	General SDF	Climatechange & sea level rise	highlighting the problem & provides possible solutions	noted
S_79.3	General SDF	Integrated Transport System	Perhaps the IPTN needs to be relooked at in light on changes in movement due to covid.	noted
S_79.4	General SDF	Climate change	climate change foreseen to pose huge problems especially coastal cities. See project drawndown	noted
S_79.5	General SDF	Solid waste management	city needs to realise economic benefit potential of waste - see Curitiba & Copenhagen examples	noted
S_79.6	General SDF	Public green & blue spaces	highlights the importance of open spaces	noted
S_79.7	General SDF	Safe cities	highlights the importance of safe cities	noted
S_78	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'	(see response for S_5)
S_79	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would destroy this	(see response for S_5)
S_80	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would destroy this	(see response for S_5)
S_81	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would destroy this	(see response for S_5)
S_82	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area and be detrimental to the area	(see response for S_5)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_83.1	General SDF	Transport-NMT	Include NMT (walking, commuter cycling and active mobility) routes visually on all District Level plans.	This is not possible on the primary district SDF and associated Sub-district SDF maps, simply due to the extent of these routes across the district and the ability to accommodate this along with other critically important development guidance in map format. The development guidance for this is therefore confined to text only, as is the case for other issues (e.g. small open spaces, public squares etc).
S_83.2	General SDF	Nodes	Consider and indicate civic nodes not only as a point-based/location based only but also linear in nature.	Certain things are not easily captured on a map to be reflective of desired development guidance. This applies to 'civic precincts' and 'urban nodes', which is why they are designated on maps as conceptual designation rather than definitive / literal designations (e.g. cadastral lines, contour line, roads). The draft DSDF does, however, also (unlike the currently 2012 approved DSDF) designate 'development corridors' which to a degree addresses the comment that nodes not only be point but also linear in nature. Important in association with this is the accompanying development guidelines (both general to the district and also specific to a particular area) for development corridors.
S_84	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area and be detrimental to the area	(see response for S_5)
S_85	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area and be detrimental to the area	(see response for S_5)
S_86	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area and be detrimental to the area & against EMA	(see response for S_5)
S_87	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area and be detrimental to the area	(see response for S_5)
S_88	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area and be detrimental to the area	(see response for S_5)
S_89	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area and be detrimental to the area	(see response for S_5)
S_90	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area and be detrimental to the area	(see response for S_5)

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S_91	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area and be detrimental to the area	(see response for S_5)
S_92	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area and be detrimental to the area & against EMA	(see response for S_5)
S_93	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area and be detrimental to the area. Pls add a outside gym and jungle gym for the youth	(see response for S_5)
S_94	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would be out of character, create more traffic and crime, be detrimental to the area & against EMA	(see response for S_5)
S_95	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the area, be detrimental to the area & cause various problems (overcrowdedness, crime, traffic, infrastructure capacity)	(see response for S_5)
S_96	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would be out of character, create more traffic and crime, be detrimental to the area & against EMA	(see response for S_5)
S_97	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area. Constantia identified as a tourist destination & dev of sub-economic housing would not be in keeping with the area, go against the vision in the DSDF and be detrimental to the area	(see response for S_5)
S_98	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' is a safe space that residents use & value, dev of sub-economic housing here would be a loss to the area and for the people who use it.	(see response for S_5)
S_99	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' is a safe space that residents use & value, dev of sub-economic housing here would be a loss to the area and for the people who use it.	(see response for S_5)
S_100	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' is a safe space that residents use & value, dev of sub-economic housing here would be a loss to the area and for the people who use it.	(see response for S_5)
S_101	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would be out of character, create more traffic and crime, be detrimental to the area & against EMA	(see response for S_5)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_102	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would be out of character, create more traffic and crime, be detrimental to the area & against EMA	(see response for S_5)
S_103	sub-district	Constantia	Emporium Dev has increased traffic congestion in the area - which any further dev will worsen. Any new medium density housing on the site will diminish or destroy the Nirvana Park asset - & decline nearby property prices. Many other open areas elsewhere better suited to this.	(see response for S_5)
S_104.1	Environment		SDF s1.8 and s2.3.1 should refer to declared Marine Protected Area	Noted, & will be reflected
S_104.2	Development Edges		unclear distinction between urban edge & development edges	This will be addressed - including in the terminology section (Annexure).
S_104.3	Development Edges		P36 statement that no further dev should be permitted in Protected Areas needs qualification - as some infrast dev such as toilets, pathways, parking, food outlets and accommodation are required to support tourism	Agreed - excepting for accommodation and potentially 'food outlets' - depending on what both may comprise - and require careful assessment and guidance.
S_104.4	map	Tokai	Tokai area incorrectly shown on maps as Agriculture. Should be green biodiversity area designation & indicated as part of the TMNP.	Agreed, & will be amended.
S_104.5	map	Noordhoek	The Noordhoek area is not indicated on Fig.5.	will check
S_104.6	map		The area in Silvermine (above Lakeside) should be indicated as natural area (& not light green).	Will check
S_104.7			P59 'Tokai (forest) Park' should read 'Tokai Park and Manor'	Noted, & will be reflected
S_104.8			Fig.7 should not include an NDA at Lake Michelle, and should reflect proposed Masiphumelele dev at rem erf 5131.	Disagree re- NDA - this is in development process and in-principle some development (yet to be determined) is supported. Masi dev is being amended for inclusion.
S_104.9	sub-district	Hout Bay	Need for improved NMT between Constantia Neck & Hout Bay and up to Suikerbossie	Agreed. Will check for improved reflection of this proposal.
S_104.10			P82. Propose including: '4. Consideration should be given to ceding certain portions as appropriate to the TMNP or its management'	Will check to ascertain appropriateness
S_104.11	sub-district	TMNP	Note UCT is in sub-district 3 and includes proposed Nelson Mandela Project at Groote Schuur estate in the TMNP	Noted. This, however would belong in Sub-district 5: TMNP and environs. Also inappropriate to refer directly to development proposals (unless approved or unanimously supported by the SDF /City) - and the merits thereof are currently potentially questionable to appropriateness.
S_104.12	sub-district	TMNP	SDF needs to address the Rasta camp in Ocean View	The SDF includes a generic statement - which proposes no urban dev beyond the urban edge. This, & other such cases, will be dealt with on a case by case basis (with the SDF 'position' as stated.

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S_104.13			P18 should rather read "1. While a small portion of this area (to the west) ~~has been purchased by~~ has been donated to the TMNP to form a part of the 'Protea Ridge corridor' linkage, this represents an absolute minimum (with the southern portion of the corridor ~~still to be~~ is being formally secured though the current Imhoff Gift development application) and ideally should be significantly wider. ...".	Noted, & will be reflected
S_104.14	sub-district	TMNP	In sub-district 5 section: The "declared TMNP World Heritage Site" needs to be referred to as the "declared TMNP component of the Cape Floral Region World Heritage Site"	Noted, & will be reflected
S_104.15	sub-district	TMNP	Should read: 2. In alignment with the TMNP Park Plan support appropriately scaled tourism and recreation development within identified high intensity leisure zones ~~activity~~ and designated visitor sites" (pg. 111)	Noted, & will be reflected
S_104.16			Should read: a. Within the broader vision for the Southern district the vision for the TMNP is that of a unique ~~urban~~ -national park in an urban setting, that balances conservation and scenic landscapes.	Noted, & will be reflected
S_104.17	sub-district	TMNP	P113 should read '11. "Support the further appropriate development and upgrade of the Tokai Manor precinct ~~TMNP HQ~~ as a high volume, mixed use recreational and tourism destination place. Picnicking, walking and biking are key opportunities associated with the most accessible flattest part of the TMNP. Opportunities exist for recreation and tourism links to the Porter Estate and Constantia – Tokai wine farms".	Noted, & will be reflected
S_104.18	sub-district	TMNP	P114. Miller Point a City managed resort so delete ref to TMNP here	Noted, & will be reflected
S_104.19	Implementation	Transport	Fish Hoek bypass should be withdrawn as will traverse the TMNP & WHS and will have significant inappropriate impacts	Disagree that it be withdrawn at this stage (as premature), but noted, and will notify & engage with City Transport on this going forward (re- long term transport network in the city) - as to whether in future this be withdrawn.
S_104.20	Implementation	Transport	Prioritise the Hout Bay bypass for NMT	Agree in-principle. Will highlight with City Transport - but budget remains the key issue
S_104.21	Implementation	Transport	TMNP has an approved Cycling & Mountain-biking EMP inclusive of a network - which City's NMT should link to	Noted & agreed
S_104.22	Implementation	Human Settlements	Table 7: CoCT Informal Settlement Planning Pipeline: "Hout Bay, USIP, Planning application cancelled – waiting POA from SANParks for re-submission". Please clarify which project this is?	will check
S_104.23	Implementation	Environment	2. Developing a well-managed and monitored programme for the sustainable utilisation of groundwater resources, needs be excluded from Protected Areas.	Noted, & will be reflected
S_104.24	Implementation		If withdraw Peninsula edge policy must ensure adequate edge management guidance in DSDF	Noted & agreed

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_105			SDF provides only vague criteria for decision-making in HPOZ areas which is problematic re- creating uncertainty, controversy and conflict between depts. (& the MPBL guidance is equally vague and found wanting). This is inadequate. What the SDF(s) should include is a '3-part character statement' to apply to each HPOZ - re- a) a character description; b) a list of character-forming elements; c) a list of decision-making criteria establishing reasons for approval or otherwise. Given this, he suggests that each of the district SDFs include a sub-section (probably of the section dealing with the spatial development strategies) that lists the HPOZs in the district/sub-district and gives an indication of the character-descriptions, the character-determining elements and of the decision-making criteria for each of the HPOZs.	The SDF at a district level cannot go into high area or site-specific detail, as the development guidance would become too excessive to reasonably be applied across all sectors as is required given what an SDF covers. The SDF should also not duplicate development guidance covered elsewhere (e.g. in the MPBL or in environmental legislative requirements. However, this proposal has some merit and will be investigated re- how this could be incorporated as appropriate district level development guidance in support of heritage related directives in the MPBL as well as in the Environmental Dept.s heritage guidance as per HPOZ areas.
S_106	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. why nirvana park not Alphen park which is substantially bigger and less used? Nirvana park is heavily used, safe, and valued by residents and visitors alike. Nirvana Park was given to the people of Cape Town as public open space. dev of sub-economic housing would not be in keeping with the area and loss of tree coverage would be detrimental to the area & inconsistent with policy (ito promoting quality open spaces. development of the park will be against the EMA. residents in the area have little trust inthe City due to recent developments in the area.	(see response for S_5)
S_107	sub-district	High Constantia	erven 1063, 2133, 2134 & 12966 indicated as 'high value green infrastructure'. But 2134 & 12966 are existing commercial forming High Constantia - & 1063 & 2133 are private zoned SR1 with dev rights & aspirations for further resid given their size.	Agreed that 2134 & 12966 erroneously designated & should be 'urban development'. Erven 1063 & 2133 should rather be indicated as NDA but with special/specific provisions that realise significant additional public good in tandem with additional private good (re- improved development rights).
S_108	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would not be in keeping with the character area and be detrimental to the area & against EMA. Densification will also have impact on infrastructure.	(see response for S_5)
S_109	sub-district	Westlake	it is proposed the the SDF enable sport and recreational clubs to explore value adding opportunities to ensure the long term sustainability of these community facilities as these could also contribute to economic growth and improved mix uses resulting is reduction of travel distances and trips.	Noted. And generally agreed. The revised draft SDF to include development guidance as appropriate to such areas.
S_110.1	sub-district	Noordhoek-open space	DSDF fails to fully integrate the conceptual notion og GI & its associated spatial interventions in that it neglects to recognise where and how the connectivity of open spaces and GI in Noordhoek can be enhanced. Watercourses innaccessible due to private land. public-private partnerships important and encouraged.	The GI is not (yet) included in the draft DSDF due to information layer flaws which still require addressing. The current draft DSDF development guidance does not contradict the intent outlined in this comment (re-significance, connectivity etc). Inaccessibility issues mentioned relate to urban management issues rather than development guidance in a policy plan.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_110.2		Noordhoek-NDAs	Propose a new NDA along the southern edge or urban development n Noordhoek in order to 1) support open space connectivity 2) facilitate the integration of green corridors to maximise ecological, green infrastructure and public benefits. encourages adjustment to current urban edge line to include Portions of erven 4833, 4834-RE, 4835, 4836-RE as urban area & forming a new NDA. encourage adjustment of coastal edge line seaward of Erven 4825-4832.	2001 Peninsula Edge policy indicated edge line along proposed new Katzellenbogen Road, but that would be reviewed if road not built / removed from proposed. In 2008 City's PEPCO approved re-alignment of (more restrictive) edge along existing Katzellengogen Rd & Cactus Rd alignment (as new road not being built). Propose edge remains as is - but that within broad parameters of original proposed new road alignment (i.e. alignment as guide - to be fixed substantially along this alignment but to incorporate improved (indeed any substantive) rights on northerly portions of relevant erven where not yet exercised (i.e. erf & erf) - to accommodate (only if) trade-off of increased appropriate development vs increased public good (to advance affordable housing on public land & improved public recreational access to greater wetland area & linking E-W across to beach & also potentially enhanced tourism economy on private land portions to be developed). This may entail specific amendment of the edge re- affordable /restorative justice housing, and possible amendment on private development area. However, any private development should be in keeping with density & landscape impact considerations of the area.
S_110.3		Noordhoek-detailed spatial suggestions	suggested wording for new NDA.Generation school site to be annotated as such on DSDf or removed as yellow area. Noordhoek sportsfield site not shown as NDA (pg98) and incorrectly described as area 2 (Pg105) . Area 2 on subdistrict plan has no guidelines provided. identification of other lower order nodes (Noordhoek Emporium & Red Herring complex). Refinement of urban and costal edge. reference to redevelopment principles of Lake Mitchelle, Caravan Park, Old Serina Lands. develop holistic open space network	Draft DSDf to me amended accordingly to appropriately reflect development guidance for these areas.
S_111	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of sub-economic housing would be out of character, create more traffic and crime, put pressure on infrastructure, be detrimental to the area & against EMA	(see response for S_5)
S_112.1	General SDF issues	General - document complex and lengthy	an executive summary for each district could help.	This may be considered in future (post approval) - as part of a communications exercise towards improving accessibility to the District SDF. However, this will not be a focus until then given the range of capacity demands required towards completion of the draft DSDfs for approval.
S_112.2		Timing of the DSDf	timing of the preparation of the frameworks and implementation plans be reconsidered and brought into sync with the CTMSDF process. & The Implementation Plan timelines be shortened to a 3 year period so that they can be easily updated with changes in circumstances and approaches.	Agreed. Alignment with CTMSDF now happening more meaningfully - which is resulting in the DSDf approval date being pushed out. This is complicated by the uncertainty around elections and that it is unlikely approval of the CTMSDF and DSDf will be prior to elections. It is being argued that Implementation chapter should arguably be revised annually (bearing mind that this report is not being statutorily approved but is rather an assisting mechanism towards alignment and co-ordination between depts.)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_112.3	Transport	Evolving Concepts and Approaches	consider the possibilities offered by the lessons from the COVID-19 pandemic in terms of relocation of residential and work opportunities looking to build on the TOD approach and create a "15 minute" city	This is being acknowledged and incorporated into the SDFs as best possible.
S_112.4	Transport	Cycling	Cycling and walking be made the foundation of all development and transport planning processes. Any planning process must consider how cycling and walking can be incorporated into the development or project under consideration. Cycling and walking should not be seen as a mode of transport relegated to a section in the implementation plans. Each of the DSDF implementation plans should be updated to include NMT with cycling and walking specifically clarified as separate modes in their own right as a key principle underpinning the plans.	This is being acknowledged and incorporated into the SDFs as best possible, but will be reviewed to see if can be improved.
S_112.5	Transport	Cycling	Cycling infrastructure planning must provide capacity for the changing profile of cycling as innovations are evolving.	Noted, and agreed.
S_112.6	Transport	Cycling	There are differing degrees of emphasis accorded to NMT between the 8 frameworks. Tygerberg, Northern Blaauwberg and KMPGBD DSDFs to be revisited to incorporate a detailed description of the NMT interventions required. The 2008 Bicycle Masterplan should be revisited and updated.	Noted, and this will be picked up by those districts.
S_112.7	Transport	Cycling	Behaviour Change- Each of the DSDE&F Implementation plans have a specific approach to enable behaviour change programmes with clear budget allocations; A clear education programme for both motorists and cyclists is developed and implemented at both the City and local scales.	This is a management related issue and cannot be addressed by the DSDF.
S_112.8	Transport	Cycling	Demonstration Projects- to trial and demonstrate what cycling can do to both serve the community and transform the area. At least one demonstration project be identified and initiated within one year within each district & in some instances across districts to create cross linkages	This can be considered for incorporation into the Implementation reports (although this remains primarily / entirely in the domain of the Transport dept.).
S_113	sub-district	Westlake	it is proposed the the SDF enable sport and recreational clubs to explore value adding opportunities to ensure the long term sustainability of these community facilities as these could also contribute to economic growth and improved mix uses resulting in reduction of travel distances and trips.	Noted, and agreed, and guidance will be reviewed to see if can be improved.
S_114	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. There are other more suitable sites for housing. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area and loss of tree coverage would be detrimental to the area & lead to overcrowding.	(see response for S_5)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_115	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. There are other more suitable sites for housing. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area	(see response for S_5)
S_116	sub-district	Mowbray-Rondebosch	support of the identification of the Rondebosch and Mowbray Golf courses as potential residential infill sites	Noted. See also, however, response to comment for section s_132 below.
S_117.1	sub-district	Constantia	Suuport for most proposals in SDF including specifically for the Constantia area	Noted.
			Objection to proposed development of 'Nirvana Park'. why nirvana park not Alphen park which is substantially bigger and better placed for development? Nirvana park is heavily used, safe, and valued by residents and visitors alike. Nirvana Park was given to the people of Cape Town as public open space. dev of sub-economic housing would not be in keeping with the area and loss of tree coverage would be detrimental to the area & inconsistent with policy (ito promoting quality open spaces. development of the park will be against the EMA. residents in the area have little trust in the City due to recent developments in the area.	(see response for S_5)
S_117.2	sub-district	Constantia	1- Constantia Gateways' (Constantia, Alphen, Groot Constantia, Firgrove and Constantia Nek) to be given specific recognition in the SDF. 2- objection to nirvana park development. 3- Section 3.4 Guidelines for Spatial Transformation Areas. Sub-section 3.4.2. Table 3: One of our members pointed out that erf 123 was nor formerly a hotel. Please can that be corrected.	Challenge is if gateways indicated for Constantia then ito consistency this should apply to all areas which is not easy/ possible even at a sub-district level, and the value ito development guidance must be considered in relation to other key guidance required. Will correct erf 123 error.
S_118	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' Nirvana park is heavily used, safe, and valued by residents and visitors alike. Nirvana Park was given to the people of Cape Town as public open space. dev of sub-economic housing would not be in keeping with the area and loss of tree coverage would be detrimental to the area & inconsistent with policy (ito promoting quality open spaces. development of the park will be against the EMA.	(see response for S_5)
S_119	sub-district	Fish Hoek - Cape Farm 38/953	other natural area designation incorrect and inappropriate. Should be designated as a NDA for low-density residential development.	Agreed that 'other natural area' (and currently 'buffer 1' in 2012 District Plan) is inappropriate & should be changed to NDA with appropriate dev guidance.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_120	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area and loss of tree coverage would be detrimental to the area	(see response for S_5)
S_121	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area and loss of tree coverage would be detrimental to the area	(see response for S_5)
S_122	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area and loss of tree coverage would be detrimental to the area & wildlife living here	(see response for S_5)
S_123	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area	(see response for S_5)
S_124	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area & goes against the EMA	(see response for S_5)
S_125	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area	(see response for S_5)
S_126	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area	(see response for S_5)
S_127	sub-district	Constantia	Objection to proposed development of 'Nirvana Park' no consultation with residents. Lak of clarity what 'medium density' means. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area	(see response for S_5)
S_128	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. Nirvana Park was given to the people of Cape Town as public open space. dev of sub-economic housing would not be in keeping with the area and result in a numbr of problems (loss of tree coverage , infrastructure constraints, increased traffic) . proposal inconsistent with policy (ito promoting quality open spaces. development of the park will be against the EMA & minimum erf sizes in the area.	(see response for S_5)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_129.1	sub-district	Far South-transport	conversion of dual carriage way into dedicated bus route from Kommetjie through Masiphumalele, Sunvalley Node, to Fish Hoek CBD/Station . Maintnence of rail network to Simons Town is key. Dedicated cycle routes are needed along all main roads	Conversion of Kommetjie Road to 1 dedicated bus route is inefficient (re-cost and functionality). Dedicated bus routes generally are only introduced as part of MyCiti Trunk routes - which align with mass volume movement - which is not applicable to the Kommetjie Road catchment. Agreed re-cycle routes along all main roads generally, however, dedicated is not likely given available road reserve and other uses unless cycle routes are a part of dedicated NMT.
S_129.2		Far South-education	Schooling needs are unmet and a major traffic contributor- schools on sites such as Dido Valley (behind Harbour Bay view) Noordhoek Sports fields and other areas need to be developed to create a more "self- sufficient area" and stop the daily "trek" over the mountain that many make . Dido Valley site (marine oil?) could help service the new housing developments of Dido Valley and Harbour View	Schools planning includes dept planning as well as (particularly - but not only in - in higher income areas) private sector response, which in more developed areas increasingly includes different format schools (e.g. limited or no sportsfields on smaller campuses).
S_129.3		Far south-environmental	More emphasis and support for delicate ecological areas such as Glencairn and Fish Hoek wetlands is needed as not only areas of education and recreation but climate change mitigation.	Agreed, and to the extent that it is possible and appropriate this has been done in the draft DSDF.
S_129.4		Far South-development	Any future development in Marine Oil/ Da Gama park needs to be done with massive increases in bulk infrastructure. • In particular Glancairn main road- extension of side walks, cycle routes, stable bus transport. Also • There should be no further subdivisions in Glencairn and it should remain single residential	Future infrastructure provision is carefully planned and matched to current and expected / projected future development in all areas across the city - including this area. The Glencairn area is not a targetted future densification area, however, the policy makes provision for small-scale incremental densification (in areas not targetted for future growth) according to appropriateness to specific site-specific circumstances.
S_129.5+201:205		Far South-map inaccuracies	1- Glencairn Beach Should be a destination location. 2- Noordhoek Beach (where access is available in Noordhoek) should also be declared a destination location. 3- Ou Kaap Se Weg should be a designated a scenic drive (M64). 4- The Road form Scarborough to Simons town to should also be designated a scenic drive. (M65/M64) & from Scarborough to Kommetjie (M65) & all roads leading to Cape Point. (M65/M4)	Destination places are those where significant primarily recreational-orientated development is encouraged in association with high visitorship numbers. This is not envisaged for these 2 areas (or for eg. Llandudno) as neither is seen as future high visitorship numbers places (as opposed to Fish Hoek or Muizenberg beaches). Re- points 3 & 4- these roads are designated as as scenic drives/routes (& are already declared ito the Scenic Drives Policy).
S_130	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. Nirvana Park was given to the people of Cape Town as public open space. dev of sub-economic housing would not be in keeping with the area and loss of tree coverage would be detrimental to the area & inconsistent with policy (ito promoting quality open spaces. development of the park will be against the EMA & the Constantia LASDF	(see response for S_5)
S_131	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area and will impact on traffic.	(see response for S_5)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_132	sub-district	housing	objection to low cost housing near on rondobosch Golf course service infra cant handle extra load. .Housing will put a strain on Elect water and Sewerage. Accuses the city of being sneaky and making it very difficult to object.	Housing on Rondebosch golf course will not unduly strain service infrastructure provision in the area given available and planned future capacities. However, such a development would have a major impact on golf as an activity (& competitions) on this land - severely compromising its sustainable future as a functional golf course. The fact remains that this and other courses are major land users (especially in relation to the level of activity and number of users on them at any one time), which is more particularly an issue in very well located parts of the city as this course now is. With due regard for the above there is clearly a need for an investigation into the rationalisation of public courses provision into the future. Rondebosch is neighbour to Mowbray golf course which together are a major land area in this vicinity. However, simultaneously recommending both (or even parts thereof) for future urban development does not make sense. The Southern and Table Bay district DSDFs will in the meantime recommend such a rationalisation investigation, and also decide which of the 2 courses will in the short to medium term be designated for investigation for future urban development (which a rationalisation study can later confirm or challenge). Finally, it should be noted that such a proposal as this would be a long way from actual realisation as significant steps are first required towards any realisation, and in any event the general approach should be for development of vacant NDA areas before utilised areas considered for future urban infill.
S_133.1	sub-district	housing	supports the idea proposal for low cost housing Noordhoek Sportsfields' Erf 933-99 and portion of erf 4836provided that the development is sensitive to the location and precludes and informal development.	future development will have to consider the existing character of the area and no informal development would be considered desirable as part of this development.
S_133.2	sub-district	open space links	supports the proposal for links into and through major urban space areas [such as] hiking and biking trails [including] the Noordhoek riverine and wetland corridors to enhance the tourism and recreation industry. There is also potential for a gateway into Table Mountain-Noordhoek Wetland Park	noted
S_134	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area and have many negative impacts.	(see response for S_5)
S_135	sub-district	transport	proposal to build tunnel through the mountain from sunnydale to the M3 to help with traffic flow.	this proposal is extremely expensive and highly unlikely to happen in the foreseeable future not to mention the environmental challenges associated with this.
S_136	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area and have many negative impacts.	(see response for S_5)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_137	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area, will have many negative impacts & goes against policy.	(see response for S_5)
S_138.1.1	general SDF-technical report		inconsistent ito promoting quality open spaces and emphasizes res dev primarily along main roads but proposses development on Nirvana Park, a public open space.	(see response for S_5)
S_138.1.2			the document for argues retaining views along scenic drives/routes but BMW been approved on M3.	The draft DSDF must be formulated despite past decision-making elsewhere in the city. It is the view that this guidance should still be included in the new draft DSDF despite this situation - as a means to guide future development proposals in the area.
S_138.1.3			plan mentions new residential areas at higher densities ... but with due regard for appropriate transition to surroundings areas ..." - while on page 78 it recommends a maximum of three/four storeys (or equivalent height) right beside many single-storey houses certainly does not "interface with the character of the area.	The MPBL's Development Management Scheme (i.e. zoning scheme) already permits as of right a max of 3 storeys in residential areas. Therefore recommending an additional residential storey in certain strategically located areas (e.g. immediately abutting key major road connections between urban nodes / local CBD areas) is not considered excessive.
S_138.2.1	General Implementation Plan		No page numbers; no abbreviation & acronyms section; incomplete sections; no motivation for removing certain policies;	Noted. Document is first draft and still needs refinement.
S138.2.2			Potential low-intensification urban overlay zones' are mentioned - including for Doordrift Road. It is difficult to understand whether the overlay zone would prevent intensification or promote it	Noted. Potential overlay zones could make provisions towards achieving either. The draft DSDF needs to be clearer in this regard where mention is made of such overlays being introduced.
S_138.2.2			If Constantia plan is to be repealed the essence of it needs to be maintained to ensure the area doesn't loose its unique attractive qualities, built form, etc. one size fits all approach will not work	It is presumed this refers to the Constantia Triangle local area policy. It is agreed that the local area character should not be unduly negatively affected, and should ideally actually be enhanced into the future.
S138.2.3		transport	Request not to remove historic road schemes such as Doordrift Road, Constantia in order to preserve large, attractive, leafy trees along this route as it is so valuable (as the City points out elsewhere) as a carbon sink and a source of shade in these times of global warming.	Removal of a road scheme will not result here in the road reserve width being reduced in future. On the contrary, removal of this and many other schemes elsewhere is rather to remove long term plans for further road widening etc which is no longer considered appropriate or feasible. The draft DSDF guidelines confirm (more strongly than the current approved district SDF) that tree coverage, vegetative interfaces on scenic routes etc are most important to retaining and enhancing future character in areas such as this.
S_138.2.3		environmental	Exclusion of various Environmental and Heritage areas from triggers for protective action should be approached with great care. These are of great value for tourism and recreation and should be preserved	This has been a detailed exercise done by planners & environmental & heritage departments of the city. Intention is to identify sites with little or no environmental & heritage significance

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S138.2.4		environmental	Promote a water sensitive City' - but City approves residential developments that leave no open space increasing run-off and preventing water to soak-down and replenish aquifer- see three-unit development currently approaching completion on Kirstenbosch Drive	Noted. This is however an important consideration in future development of urban areas generally (the Catchment Management dept comments on all development applications where relevant) and the Liesbeeck River catchment in particular (due to its history of flooding).
S_138.2.4		environmental	city encourages Biodiversity conservation' but proposes to cut down half of Nirvana Park . Constantia fits the definition of a "special Place" and should be dealt with as such.	(see response for S_5)
S138.2.5		mapping	The map and its legend on page 110 are too low-resolution to be useful	noted
S_138.3.1	SDF Technical report	intro	In the heading 1.2 there seems to be a word missing.	Noted, and will address.
S_138.3.2			Site-specific circumstance'- his term has allowed inappropriate developments to be approved (bmw workshop in Constantia)- an oversight mechanism is required. Similarly the checker development is inappropriate development in a destination place and along scenic route.	The DSDF cannot address this issue as it is not within the mandate of policy.
S_138.4.1	Subdistrict 2	constantia	agree with the first point of the vision but encourages caution re-second point ('intensifying development, increasing the range of living experiences and economic opportunities') also the statement "enhancing public space" is contradicted by the proposal to develop nirvana park.	noted. (see response for S_5)
S_138.4.2	Subdistrict 2	Supporting dev guidelines	Points 1, 2 and 3 are endorsed. Point 4 should actually be two points (economic activities; and finer-grain residential, related to this who decides if an activity is 'low-impact', 'small-scale', low-impact subdivision'? Point 6 is confusing & worded incorrectly	Noted, and been reviewed.
S_138.4.3			Point 6 ii (a) - the omission of any safeguards for residential erven within 400 m of "existing commercial nodes/precincts" leaves these areas open to serious degradation. There should also be limits to the numbers of parts into which these erven can be sub-divided, and strictures should be placed on how many dwellings can be built on what was previously one SR1 erf with a minimum size of 1350 m2.	The SDF proposals will have to be considered (in law) also to the MPBL's DMS (Development Management Scheme). The basic premise is that urban areas need to become more liveable, walkable etc. and hence the SDF proposals (which are in line with international best practice. Evidence is that these development outcomes
S_138.4.4			Point 6 ii (b) the maximum built coverages do not seem to match those given in 'Table A: Summary of the zonings and development rules' on page 95 of the current Municipal Planning By-law and are thus confusing. Also, if sub-division of erven is contemplated, point 6 ii (b) does not make any provision for erven smaller than 1000 m2 - which could be resultant sizes when erven are sub-divided.	Minimum erf size overlays in the MPBL are now ±50 years old and thus extremely dated. Spatial policy needs to reflect changing realities and imperatives, and inform future changes in the MPBL. The fact is (internationally and locally) that densification around CBD-type areas has lead to massive enhancements to living and lifestyle (e.g. City bowl; Greenpoint; Claremont; Constantia village).

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S_138.4.5			Permitting unfettered densification within 400 m of a "commercial node/precinct" could lead to unmanageable scenarios. For example, it would be ridiculous to sub-divide a 1350 m2 erf even once - and then allow: a main dwelling, a second dwelling and then a third dwelling on each half of the now sub-divided erf. This would total six dwellings on what was previously a one-dwelling erf- this will lead to many negative outcomes	See responses to comments in sections s_138.4.3 and s_138.4.4 above.
S_138.4.6			Point 8. In this paragraph "retirement villages" are mentioned and we ask that this section of the market be catered for. section 3.5.1 of this Technical Report, it is suggested that between 2020 and 2040 the percentage of the population aged 65 years and more is expected to almost double.	Noted. This is addressed in certain sub-district areas - but will be reviewed to see whether improvements / additions are necessary in other sub-districts - or whether a general district-wide development guideline/s is required.
S_138.4.7			Point 10. Here "open space improvements" is mentioned, a statement at odds with the Nirvana Park proposal on page 80, which seeks to halve a park, not improve it.	(see response for S_5)
S_138.4.8			Point 11 - How can this intention be upheld when the proposed BMW motor workshop & Checkers has recently been approved to be placed right up on the M3 scenic drive.	The draft DSDF must be formulated despite past decision-making elsewhere in the city. It is the view that this guidance should still be included in the new draft DSDF despite this situation - as a means to guide future development proposals in the area.
S_138.4.9			Point 17. This is a repetition, word for word, of point 8.	Noted, and this will be amended.
S_138.5.1	Subdistrict	NDAs- SA Riding School	There seems to be no change from the provisos in the 2012 TR. Has this site not since been ear-marked as a land restitution site in favour of the Sardien family?	Not that this dept is aware.
S_138.5.2		Nirvana Park	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area, will have many negative impacts	(see response for S_5)
S_138.5.3		Constantia corner Ladies Mile Spaanschem at River Road Site: erf 16-4724-rem and erf 14038.	supporting guidelines very confusing and needs to be reworded. Does the one refer to the already partially developed section, and the other to the completely undeveloped section? The point 2 paragraph is particularly confusing. What does "align with this area" mean? Which area? The already partially developed section? The rest of the points are endorsed and will hopefully be upheld.	Noted. See reviewed development guidance for this site/area - which now is hopefully clearer and unambiguous.
S_138.5.4		Firgrove	additional suggestions: • Some inclusionary housing can also be incorporated here; A school could be integrated on this large site	Noted, and broadly agreed with, although the details will emerge in the actual development process.

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S_138.5.5		Missing NDAs as per 2012 Plan	Strawberry Lane. Erf 16-3110. Size 3,5 ha. This is zoned educational. In the 2012 Technical Report it was included and designated as "mix of medium and low density housing". Figure 7 of this 2020 Technical Report indicates it as Potential Medium Density Development, but it is not included in the New Development Areas section. Why?	Noted. This is an omission and has been rectified.
S_138.5.6			Sweet Valley - Soetvlei Avenue. Erf 16-3331. Size 4,7 ha. This is zoned "government (educational?)". Does nobody know? In the 2012 Technical Report it was included and designated as "Residential infill and possibly educational use", as well as "The most appropriate future use of this site should include a mix of medium and low density housing." This site should be mentioned in this latest TR. Why is it no longer there?	Noted. This was an omission and has been addressed in the revised final SDF.
S_138.5.7			Rathfelder Park - Erf 2933 In the Technical Annexures document, a table on page 44 indicates that Rathfelder Street (Rathfelder Park, presumably), as it is listed as being "large city owned Open Spce (sic) zoned property in Constantia. Currently used as park and recreational site. 20% developable land. Pausity (sic) of state owned land for affordable housing. Potential restitution site." This piece of land should also be mentioned in this latest TR. Why is it not there?	Noted. This is not included explicitly as an NDA site in the final draft SDF. However, it should nevertheless be considered as a (one of a number of) potential public open space areas where a small (or very small) portion could in future be considered for additional housing stock which helps to address the historical imbalance of housing opportunities in the large area associated with past inequities in terms of area-based living policies and actions.
S_139	Subdistrict	Far South	Endorsement of the safe house proposal on erf 17775	noted
S_140	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike.	(see response for S_5)
S_141	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area, will have many negative impacts & goes against policy.	(see response for S_5)
S_142	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. Nirvana Park was given to the people of Cape Town as public open space. dev of sub-economic housing would not be in keeping with the area and loss of tree coverage would be detrimental to the area & inconsistent with policy and Law.	(see response for S_5)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_143	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area, will have many negative impacts on the area	(see response for S_5)
S_144	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area, will have many negative impacts on the area & go against the minimum erf size	(see response for S_5)
S_145.1	sub-district guidelines	Hout Bay	infrastructure upgrade required for densification of Imizamu Yethu- current system already cant cope with existing demand.	Agreed. This however is really a line service planning and management issue.
S_145.2	sub-district guidelines	Hout Bay	Hout Bay wetland shown as public open space, should be shown as wetland in order to receive the protection and rehabilitation it deserves	This fact is recognised elsewhere (in the approved Bionet) and is a primary informant to the 'open spec' designation here - & would need to be referred to in any assesment of any proposed development in this area.
S_145.3	sub-district guidelines	Hout Bay	3. There is a Biodiversity Agreement pending for the river corridor area which includes the wetland from the Victoria bridge to the estuary and the sea- this should be indicated as such an area so that it will be afforded the protection and buffer zone that a Biodiversity Agreement site enjoys	This is a management related issue - which is not a focus of an SDF policy report
S_145.4	sub-district guidelines	Hout Bay	A significant area of urban agriculture has developed over the last few years in Hout Bay and should be mapped in the document- including market gardening	This could be recognised in the Baseline report - if available in a recognisable map layer which applies consistently across the city.
S_145.5	sub-district guidelines	Hout Bay	high density housing to the western side of the main road, over erf 4061 and erf 4062 would have a significant negative impact on the character of Hout Bay and if sewer system not upgraded this will further compromise the waterbodies.	These erven have been bought by the (National) Housing Development Association to alleviate IY housing issues. Any development on these sites will be guided by due process however, which would include impact on services and character.
S_145.6	sub-district guidelines	Hout Bay	development setbacks need to be enforced for new developments as well as POS consolidations along the river corridor	This will be addressed as part of due process with any development application
S_145.7	sub-district guidelines	Hout Bay	The no development below 1:50 year floodline rule has been and is being ignored or flouted by the planning department (Bishopsford & erf 666)	Disagree with this assertion.
S_145.8	sub-district guidelines	Hout Bay	No noxious trade should be allowed in the harbour again. The impact of this stench on the health, well-being and the tourist economy of Hout Bay was enormous and totally underestimated	Agreed, and development proposals elsewhere recommend this. However, the current activities need to be assessed also ito impacts on existing job opportunities.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_145.9	sub-district guidelines	Hout Bay	Fig 10 – page 70. Wetland needs to be added as a waterbody, also the estuary and river. Also areas of agricultural importance need to be added – to include the new farmed areas adjacent to the river (e.g. erf 4061, 4062).	See responses to comments in sections s_145.2 and s_145.4 above.
S_145.10	sub-district guidelines	Hout Bay	Page 72, point 2. How will the green economy be encouraged and implemented?	This is addressed through broad (non site-specific) development guidance for the district
S_145.11	sub-district guidelines	Hout Bay	Page 72, point 4. Contradictory. It says growth should be restricted to upper valley but this is where the small holdings area is where development is excluded.	restricted (in) the upper valley not (to) the upper valley
S_145.12	sub-district guidelines	Hout Bay	Point 5 – 4 storey buildings along Main Road and Victoria Ave will entirely alter the character of Hout Bay.	In order to limit densification of the entire Hout Bay while providing for demands of growing city densification needs to be focussed along key transport routes such as main road and Victoria Avenue.
S_145.13	sub-district guidelines	Hout Bay	Point 6 – strongly object to the re-development of the pelagic fish facilities. The previous industry mentioned in Comment 8 was detrimental the whole of Hout Bay from an aesthetic and health and economic perspective. It was totally unacceptable that the quality of life of the whole population was compromised.	See response to comment in section s_145.8 above. This relates to the continuing of existing activities, although the SDF must emphasise that future such development of this type should not be encouraged. See revised draft guidelines
S_145.14	NDA	Hout Bay	Development of erfs 4061, 4062, and 5637 for high to medium density housing would completely alter the character of Hout Bay. Especially without upgrading the sewer system would cause massive pollution to the river which would probably render it an open sewage canal, beyond environmental repair	These erven have been bought by the (National) Housing Development Association to alleviate IY (crisis) housing issues. Any development on these sites will be guided by due process however, which would include impact on services and character.
S_146	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area, will have many negative impacts on the area & go against the minimum erf size	(see response for S_5)
S_147.1	sub-district - Far South	development	The policy of intensification or densification will destroy what remains of the character of the southern peninsula- current infra cannot /will not cope and environment & tourism will be negatively affected. Similarly character is lost when old character buildings are destroyed	Generally disagree. Intensification may 'destroy' existing / old character of an area, but in many (arguably most) instances that existing character is not optimal and in the current context can be substantially enhanced through appropriate new development. The issue is identifying that which needs preservation vs that where re-development will significantly enhance character, liveability etc.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_147.2		NDA- Simons town Golf Course	object to development of housing on site. Encourage upgrade of ablution facilities at Windmill Beach and Seaforth	Noted re- the golf course proposal. Such a development would severely compromise its sustainable future as a functional golf course. However, the fact is that this and other courses are major land users (especially in relation to the level of activity and number of users on them at any one time), which is more particularly an issue in either very well located parts of the city or in strategically located sites as this course is, where potential benefits from other land uses (e.g. residential combined with open space and possibly parking) would potentially far outweigh the current benefits accruing to the broad public good here. With due regard for the above there is clearly a need for an investigation into the rationalisation of public golf courses provision into the future. This draft DSDF will therefore recommend such a rationalisation investigation, but will in the short to medium term designate for investigation for future urban development a portion of this site (which a rationalisation study can later confirm or overturn). Finally, it should be noted that such a proposal as this would be a long way from actual realisation as significant steps are first required towards any realisation, and in any event the general approach should be / is for development of vacant NDA areas before utilised areas are considered for actual development. Upgrade of ablution facilities is beyond the scope of a district-wide policy plan.
S_147.3			Parks and sporting grounds should be retained. Further development of Glencairn wetland should be prohibited.	Agreed, and generally this is exactly what the draft DSDF includes / promotes.
S_147.4		transport	object to railway line reduced to single line between Muizenberg and Fish Hoek and then completely removed between Fish Hoek and Simon's Town- will have many negative impacts (traffic pollution, congestion, etc)- need for reliable public transport. If this transport hubs shouldnt be too large and insensitive to surrounding area as it seems the surrounding area becomes dirty and grimy with the rules of the road being broken eg. Beach Road area between OK Furniture and Shell Garage Fish Hoek.	Noted. Either way this is likely to take years to a) get clear agreement, and b) to implement (as it is restoring train services - & associated infrastructure - will likely take a long time). The argument is that the rail service (unless at least as frequent as that further up the line - & matching that of 20 years ago) is inefficient, which is problematic in highly constricted stretches such as Muizenberg to Fish Hoek and where other more beneficial (to the broader public good) uses / activities can occur.
S_148	sub-district - Far South	transport	object to railway line reduced to single line between Muizenberg and Fish Hoek and then completely removed between Fish Hoek and Simon's Town- will have many negative impacts (traffic pollution, congestion, etc)-bus timetables to be made available to encourage people to use busses.	Noted. Either way this is likely to take years to a) get clear agreement, and b) to implement (as it is, restoring train services & associated infrastructure will likely take a long time). The argument is that the rail service (unless at least as frequent as that further up the line - & matching that of 20 years ago) is inefficient, which is problematic in highly constricted stretches such as Muizenberg to Fish Hoek and where other more beneficial (to the broader public good) uses / activities can occur. However, this proposed outcome should be dependent on the alternative (rationalisation &) movement system being more efficient and effective than the current rail system (assuming it is to again perform as it did a few years ago)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
		development	concerning to see mention on page 61 of Draft 2 of Southern District SDF of a retirement complex on Gordon's land in Glencairn which I believed had been previously rejected	(Check if still approved)
			concerned about development of the Simons Town Golf course and how this will affect views of ocean and along scenic drive. Also • Continuous sub divisions and construction developments in the Southern Peninsula will have a negative effect on the character of the area and the environment, especially along the coastline, wetlands and mountain areas. minimum erf size as per Simon's Town Structure Plan needs to be considered.	See responses to comments for sections s147.2 and s42.5
		communication/advertising	reommends that the City includes with it's Rates accounts, sent each month to homeowners, information that documents such as these Draft SDF and Environmental Management Framework are open for comment	This has been previously explored and opposed due to the potential plethora of info that could potentially end up being attached to such. However, this is a useful suggestion in as much as such mechanisms / options are necessary and require consideration. The DSDF process forward will consider options.
S_149.1	Subdistrict-Hout Bay	infrastructure	object to further densification in Hout Bay as current sewer infra already constrained resulting in pollution of the environment and threatens wildlife.	Generally future infrastructure provision is carefully planned and matched to current and expected / projected future development in all areas across the city - including this area. Hout Bay is not a targetted future densification area. Furthermore, infrastructure management issues really are a line service planning and management issue. However, the reality in the IY area is acknowledged. The SDF (and no other strategic planning document) supports further densification in IY. This remains a massive management challenge though.
s_149.2		Environment	There is not enough emphasis put on your plans of the importance of the River Corridor in Hout Bay and the Biodiversity Agreement that is currently pending.why is this not shown on maps.	The mapping of open space across the district (& all districts) is guided by broad city-wide environmental and open space input as to what (& to what level of detail) is or is not included. But this is noted and will be reviewed to see if can be included. Management related issues are not part of an SDF policy document.
s_149.3			Fig 10 page 70- Wetlands, Riverine Corridor, estuary and areas of agricultural importance need to be added especially erfs 4061 and 4062 all need to be recognized and protected	see responses to comments for sections s_149.4 below
s_149.4		NDA	Why is the city considering developing erfs 4061 and 4062 for low-cost housing when these are in the flood plain?erf 4061 used for urban agriculture. Also Bishopsford and erf 666 are examples of developments below the 1:50 year flood line	These erven have been bought by the (National) Housing Development Association to alleviate IY housing issues. Any development on these sites will be guided by due process however.
s_149.5		housing	The proposed spread of high-density housing to the western side of the main road onto the above-mentioned farms, would lead to a significant negative impact on Hout Bay	See responses to comments for sections s_149.4 above
s_149.6			Condradicting statements- "future growth should generally be restricted in the upper valley, but yet densification by subdivision and second dwellings are to be encouraged"	The area is not a targetted future densification area, however, the policy makes provision for small-scale incremental densification (in areas not targetted for future growth) according to appropriateness to specific site-specific circumstances.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
s_149.7			Any 4 storey building along Main Road would severely alter the character of Hout Bay and must be discouraged.	The MPBL's Development Management Scheme (i.e. zoning scheme) already permits as of right a max of 3 storeys in residential areas. Therefore recommending an additional residential storey in certain strategically located areas (e.g. immediately abutting key major road connections between urban nodes / local CBD areas) is not considered excessive or result a significant impact on character.
s_149.8			Future development of IY cannot happen without infra upgrade first, current system cannot deal with current demand.	Agreed. This however is really a line service planning and management issue.
S_150.1	Subdistrict-Main Road	Housing	objection to developing housing in and near the Rondebosch/Mowbray Golf clubs.	See response to comment for section s.132 above
S_150.2		advertising	Concerned that none of the ratepayers know about this and not many people have the chance to comment due to the pandemic. We hereby entirely object to this idea of the SDF from moving forward in anyway until such time as the GLOBAL PANDEMIC has been resolved and the South African government has declared the NATIONAL STATE OF DISASTER to be over and only then begin the 3 month commenting period. In such time it would be advised to address all neighbouring rate payers in the nearby radius of the current plans outlined in the SDF.	This and other courses are major land users (especially in relation to the level of activity and number of users on them at any one time), which is more particularly an issue in very well located parts of the city as this course now is. With due regard for the above there is clearly a need for an investigation into the rationalisation of public courses provision into the future, which this SDF will recommend. It should also be noted that Rondebosch is neighbour to Mowbray golf course which together are a major land area in this vicinity. However, simultaneously recommending both (or even parts thereof) for future urban development does not make sense. The Southern and Table Bay district DSDFs will in the meantime recommend such a rationalisation investigation, and also decide which of the 2 courses will in the short to medium term be designated for investigation for future urban development (which a rationalisation study can later confirm or challenge). Finally, it should be noted that such a proposal as this would be a long long way (if ever) from actual realisation as significant steps are first required towards any realisation, and in any event the general approach should be for development of vacant NDA areas before utilised areas considered for future urban infill.
S_151	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area, will have many negative impacts on the area	(see response for S_5)
S_152	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of medium density housing would not be in keeping with the area, will have many negative impacts on the area (road issues, loss of trees, capacity constraints)	(see response for S_5)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_153	sub-district	Constantia	objections to proposed development of Nirvana Park. Dissapointed this proposal has not been advertised to residents. The park has been left for all citizens. Currently safe space for all. developing medium density housing would be out of character with the area & result in more problems in the area(traffic, infrastructure constraints) propose this appens on alphen park instead	(see response for S_5)
S_154	sub-district	Constantia	objections to proposed development of Nirvana Park. Nirvana park is heavily used, safe, and valued by residents and visitors alike. Development of the park goes against policy.	(see response for S_5)
S_155	sub-district	Constantia	objections to proposed development of Nirvana Park. Nirvana park is heavily used, safe, and valued by residents and visitors alike.	(see response for S_5)
S_156	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area, will have many negative impacts on the area. the park has been left for all citizens by the Cloete Family	(see response for S_5)
S_157	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'. Nirvana park is heavily used, safe, and valued by residents and visitors alike. dev of sub-economic housing would not be in keeping with the area, will have many negative impacts on the area. the park has been left for all citizens by the Cloete Family	(see response for S_5)
S_158		Kenilworth	Objection to further densification of the southern suburbs corridor, specifically the new proposed Development Focus Area in and around Wynberg which includes a portion of lower Kenilworth incorporating the area bound by Wetton, Bray, Rosmead Avenue & the railway line.	All redevelopment needs to respond adequately to all relevant nformants, which may include available infrastructure capacity, character and fit within the surrounding context, heritage issues etc. Some of these are applicable to the Lower Kenilworth area referred to. However, this area, and more particularly the Wynberg CBD area, is targetted for future development intensification (within the urban node area) and densification (within surrounding residential areas. An appropriate balance of this intensification and densification with locational contextual issues are what this SDF aims to manage. And is hoped that the proposed SDF will adequately do this.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_159.1			SDF Vision & roles of district, as well as most guidelines, endorsed. However, forced removals in the apartheid era fundamentally changed Constantia's demographics and spatial morphology & the draft SDF is silent on this. The imperative of restorative spatial justice needs to be reflected in the sub-district vision statement and carried through into the primary spatial objectives. "Suburban Capeness" is the apartheid spatial morphology that replaced the activated streetscapes and mixed land use activities of those forcibly removed from the sub-district. The vision statement, as currently framed, is offensive to the restitution community and has been used in the recent past to thwart their redevelopment efforts. The vision statement needs to be totally reworked to be inclusive of all local stakeholders.	The vision will be revisited to see how it could be better framed to include such reference. However, this requirement applies to numerous other areas in the older parts of the city and would require similar reference there too for consistency. The key question, however, is (not that this is a very important issue but) whether it is appropriately included in a development vision. This shall be reviewed. Disagree that 'suburban capeness' is 'apartheid spatial morphology'. The 'rural Capeness' of 50 years ago in suburban areas is historical of former rural-type living and economic activity. It is contended that the subsequent 'suburban capeness' is a function of changing economic and living activity over time and would have (& has) materialised irrespective of forced removals or not (related primarily to massively increased property values in such areas). A good example is what has now been possible on the (Solomons's) 'Emporium' site (which was leveraged with external funders far beyond what the Solomons family would otherwise have realised). This was considered appropriate given the highly strategic location of this site. However, such leveraging has to be commensurate with the locational logic of the site (& of various different sites in the area) and cannot be assumed to hold equally everywhere (as per the case of Constantia Village developing as it has vs other sites which have remained residential. A contextually appropriate spatial development logic should prevail in any area not matter what the historical circumstances. To not do so would be inappropriate and undesirable. Notwithstanding the historical trauma of forced removals (which granted need greater acknowledgement and consideration in forging a generally agreed to future development vision and outcome) the restitution recipients (as represented in this comment) return to a different suburban environment, but nonetheless one in which it should be acknowledged that significant value-add will accrue irrespective of whether a single residential or mixed use development outcome commensurate with the current spatial development and property market context of this area (which indeed is privileged and exclusionary - to the economic benefit of the restitution claimants).
S_159.2			Constantia North & South nodes should be 'local' nodes (on SDF & NDA maps & in table)	Agreed, and amendment will be made.
S_159.3			endorse that economic activity should be resuscitated, facilitated, supported - but no evidence why this shouldn't apply to all areas	This cannot be a 'one size fits all' approach with the same outcomes everywhere. Different forms and scales of economic activity resuscitation / stimulation / support should apply to different contexts (e.g. in urban nodes along Main Road corridor vs low density residential areas of landscape character).
S_159.4			greater flexibility of guidelines for 'connector routes' required to allow 'selective re-activation of certain streetscapes'	See response to comment s_159.1 above related to historical vs cuent
S_159.5			Guideline 3: No evidence is presented to substantiate the proposed freeze on existing commercial areas, and there is no spatial logic underpinning the guideline.	Disagree that guideline be scrapped, as potentially opens the door to commercial development in new areas anywhere. However, agree guideline 3 needs amendment to reflect map guidance of where future mixed use activity would be supported. The comment has not specific comment as to where else this forward development vision should be re-considered (& this dept would argue there is not any other - except at nodes / gateway locations).

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_159.6			Should include Spaanschemat River Road in guideline 4.	Agreed, and amendment will be made (for that section where appropriate - i.e. between the nodes).
S_159.7			Guideline 6 entrenches / retains 'apartheid's spatial form', is discriminatory to the restitution community, and should be reframed to address the needs of all stakeholders. Again (in relation to this) no alternative framing is provided for consideration.	Disagree. See now reason why (ito spatial development logic) there should be exceptions here (see again also response to comment for s_159.1)
S_159.8			Guideline 9 has no justification for imposing restrictive special conditions on restitution sites.	As per above response/s disagree and see no reason to amend here.
		NDA 6	NDA 6 is no longer owned by the City, the Regional Land Claims Commissioner and the Chief Land Claims Commissioner to subdivide RE 4724 Constantia within 6 months of taking transfer of the land parcel. Further qualifications relating to that instruction require that – if the instruction to subdivide has not been carried out – those parties must report back to the land claimants (the applicants in the case) and CCT on a quarterly basis on progress in the matter and give reasons for why the subdivisions have not taken place and when they will. This has not happened as instructed by the Court	Incorrect ownership statement to be amended.
			It is unfortunate that the draft SDF views land claims as a constraint. We would argue that they are an opportunity to achieve restorative spatial justice in the sub-district. Prescribing the land uses for RE 4724 at this point would be a dangerous and contentious move, given the dynamics playing out at present. A Steering Committee should be set up with DALRRD, CCT, the Commission and the claimants to workshop how to proceed with the subdivision. That will require some focused work to be done on what land uses are envisaged for the area subject to land claims	Land claim arguably both a constraint & an opportunity. The former as the future of the site can't (as it would formerly have been under City ownership) necessarily have the development outcome the City would desire (eg. a majority residential component; or residential component entirely affordable housing). The latter as (indeed as the comment states) it will provide for restorative justice for successful claimants (even if this may be confined only to financial restoration and not include living locational restoration).
			erf 14038 and the southern portion of RE 4724, the draft SDF should not refer to them directly. The approved land uses for those parcels is now known: it is GB1	Noted, and will be amended.
	Implementation Plan		A review of the zoning of all restitution sites as some have been incorrectly zoned in contravention of Section 36 (2) of the MPBL (e.g. some sites zoned Utility that had no historical utility use), and rezoning them to align with the SD	Noted. This will be investigated & amended if necessary.
			A review of inter-departmental coordination of restitution claims, development applications and land sale agreements so as to reduce red tape and departments pursuing conflictual agendas	This is not in the domain of a SDF. However, the draft DSDF must ensure that its development guidance it is appropriate and where necessary legally correct.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
			One of the main focus areas of the SDP review should be on diving deeper into how best to work with the claimant families – not only on RE 4724 but also on other large tracts of land such as Erf 3035 Constantia . It would be short-sighted of both sides to proceed on the basis of some notional status quo: the claimant families all thinking they can maximise their returns by going for commercial development and the ratepayers et al thinking that things must stay an exclusive/exclusionary green and leafy paradise as far as possible – with CCT in the middle	Agreed. This is not in of itself something possible to address in this draft DSDF. However, it can (& will) be recommended as a follow-up action.
S_160	subdistrict	rondebosch	object to the development of low cost housing on Rondebosch golf course	See response to comment for section s_132 above
S_161.1	Subdistrict	vision	the vision should include an element of sustainability, cultural resources of Glencairn are not mentioned in the SDF, Glencairn Valley needs be considered for its natural environmental connectivity and its unique position to be a green corridor & "green" tourism, there should be a contemplation for urban farming in the Glencairn Valley	Agreed, and to the extent that it is possible and appropriate this has been done in the draft DSDF re- natural area value, connectivity etc. It is not clear where urban farming (agriculture?) in the Glencairn valley is appropriate given water availability (low stream flow) and ecological considerations.
S_161.2	Subdistrict	guidelines	The guidelines do not consider or include the Glencairn Valley at all, In Figure 2 – Glencairn is shown as a green network, but there is no discussion around this in the document. Thus Glencairn should be included in the statement below ' <i>A protected green network consisting of core natural assets and open space areas, as well as linking river systems and other open space corridors, which form an integrated open space system providing relief from the urban environment, and supporting ecosystem services and the recreation and tourism economy. a. This comprises the world-class scenic and biodiverse Table Mountain chain, wetlands and vleis (such as Zandvlei and Papkuilsvlei), riverine corridors (including the Constantia-Tokai and Hout Bay greenbelts), and beaches and rocky shores</i> ' ,	The draft DSDF does include appropriate development guidance but not specific for any particular area unless particular differentiating factor/s relative to other similar areas (eg. Silvermine or Clovelly).
S_161.3	Subdistrict	guidelines	The water feeders (natural springs in the Glencairn Valley) should be considered in the River Wetlands and their associated buffers. Additionally, the Glencairn Valley is also a floodplain which needs to be considered in any Urban Development. Furthermore, the following needs to be considered for the Glencairn Valley - Promote quality public places and open spaces Draft 2 (March 2021) Southern District Spatial Development Framework Page No. 23 i. Focus efforts ensuring as far as possible a connected open space system within and through the urban area. This includes clearer connections between open spaces.	These issues and concerns are adequately addressed in the draft DSDF in SDF maps (re- extents, designations etc.)

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_161.4	Subdistrict	Nodes	argues that is it the same as Simonstown (local node) or Dido Valley (Neighbourhood Node) and therefore requires a nodal classification. . The following needs urgent consideration in nodal classification - Include localised facilities such as primary health care, schools/ECDs and neighbourhood parks. 11. Approximate catchment area of up to 3 km located within walking distance of the communities served. 12. Precinct radius ranging between 150 m–300 m as a guideline. There is no school, nor community centre, nor clinic, nor ECD in the Glencairn Valley.	These issues and concerns are adequately addressed in the draft DSDF in SDF maps (re- extents, designations etc.) to the extent that this applicable.
S_161.5	Subdistrict	transport	The railway should be urgently reinstated to alleviate the bottle neck of the Main/Simonstown Road and Glencairn expressway junction. The connector road route needs to be less congested and the only way to do this is to have a functioning and safe rail system.improved NMT also required in the valley	These are management issues - which an SDF cannot specifically address.
S_161.6	Subdistrict	guidelines	The SDF refers to Retirement complex on 'Gordon's' land Glencairn; incorrect it is on Rotary (not on the Gordon's Camp Section) .	Noted, and will be amended accordingly.
S_161.7		guidelines	For any proposed future development in the Glencairn Valley (including Da Gama Park) the following statements need an in-depth consideration as both are pertinent and thus absent in the Glencairn Valley: 1- Access to public transport system (existing or planned): Medium to high levels of densification should be aligned with existing/proposed public transport routes. This is essential for housing development targeted at lower-income earners, who are unable to afford the costs of private transport. It should not be an overriding consideration for middle and upper-income townhouse/group housing developments, as the residents are likely to make greater use of private transport.2- Infrastructure capacity: Densification should not be supported where water, wastewater and storm water capacity are reaching points of absolute constraint, and the cost implications of rectifying the situation are too high for the private sector, or are not provided for in the City's capital budget or pipeline of projects.	These issues and concerns are generally adequately addressed in the draft DSDF in SDF maps (re- extents, designations etc.). Concerning density vs infrastructure and services concerns see response to comment in section s_129.4

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S_161.8		Spatial planning objectives	The role of this area in the context of the district and metropole is of a tourism-centred economy of metropolitan significance, as well as unique coastal urban lifestyle - the long term impact may be encouraging holiday homes which are shut for the majority of the year and thus not supporting the economy throughout the year This does not acknowledge that the navy is one of the key economic drivers in the area and leads to more sustainable economic activity than tourism (especially in current situations such as the COVID pandemic). In addition tourism is known to create a shortage of full time residential accommodation and local economic activity in areas	Noted, but this is not something the SDF can directly address.
S_161.9	Subdistrict	Far South	The Glencairn valley needs to be defined as a sub-area with its own unique character which includes its environmental resources and cultural heritage.	Noted. This will be investigated & amended if necessary. However, inclusion as requested requires area-specific issues for recommendation.
S_161.10	Subdistrict	Far South	serious consideration with regards to supporting subdivision and second dwellings on properties IRO of basic infrastructure and services.	See response to comment in section s_129.4 - and elsewhere.
S_161.11	Subdistrict	Environment	Fencing in the Glencairn Valley and other parts of the Deep South needs to consider the fauna in the area - natural corridors and pathways of these animals are being cut off by the present development. The long term impact of the removal of these corridors and subsequent environmental impact have not been considered in the SDF	This is primarily a management related issue, although it is acknowledged that this could be considered in the tMNP & environs general development guidance re- establishing and maintaining appropriate urban - nature interfaces.
S_161.12	Subdistrict	transport	Glencairn Da Gama Park specific - Support the replacement of rail with a regular quality public transport/bus service – the railway needs to be reinstated to relieve the traffic congestion, replacing it with road transport services does not make sense and will not alleviate the current traffic situation.	This requires careful assessment going forward, and will be taken up for review with relevant Transport organisations in Govt.
S_161.13	Subdistrict	transport	Support the re-purposing of the rail reserve as a major coastal multi-purpose promenade opportunity – this statement should be removed.	Noted. This may be reviewed following further follow-up with relevant Transport organisations in Govt.
S_161.14	Subdistrict	Environment	In Figure 4, Glencairn should be included as a Critical biodiversity zone (Core 1) with an Ecological Core Support area within Protected and Conserved Area	This has already been done where appropriate - with detailed information drawn directly from the Environment management Dept.
S_161.15	Subdistrict	Environment	Figure 5, the Glencairn Valley should be classified as a proposed heritage area due to the rich diversity of cultural landscapes (mostly undiscovered).	The draft DSDF is guided by work done by the Heritage Dept

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S_161.16	Subdistrict	transport	In particular Glencairn main road- extension of sidewalks, cycle routes, stable bus transport. Up the Glen Valley public transports and sidewalks. Maintenance of rail network to Simons Town is key. Key transport corridor along Kommetjie main road- conversion of dual carriage way into dedicated bus route from Kommetjie through Masiphumalele, Sunvalley Node, to Fish Hoek CBD/Station -decrease number of cars on already congested roads. Provided stable transport "spine" for "the valley" that intersects with the greater City Rail network that can transport residents, workers, school goers and even tourists effectively and safely.	The draft SDF addresses most of these issues through a range of inter-related development guidelines covering various sectors. The SDF proposes a potential longer term alternative solution to the current rail provision since it is believed that (notwithstanding the current collapse of rail) this is not an optimal longer term movement or development related solution in a tight goe-physical context.
S_161.17			There should be no further subdivisions in the Glencairn Valley and it should remain single residential until such time when additional infrastructure and services are in place.	See response to comment in section s_129.4 - and elsewhere.
S_161.18			The current vision needs to consider the current residents and ratepayers in the Deep South an how the densification will impact on their quality of life – especially in terms of privacy and noise nuisance – these are elements that are omitted from the SDF. Thus the SDF is an opportunity to create a vision which is inclusive with less orientation to tourism as the main economic driver and more inclination to including the residential focus of the area. There should be a ratio for residents/tourist dwellings to ensure that the endemic character of Glencairn is not absorbed into a larger CoCT culture and thereby lost.	This is an issue commented on throughout the district. See response to comment in section s_129.4 - and elsewhere.
S_161.19			The Simons Town golf course: erven 1514, 4459 and portions of 1537, 1544, 1539: Size ±7.2 ha and ±5.5 ha is a penguin breeding ground and any proposed development thereon needs to take cognisance of this fact.	Noted, and agreed that this must and would be taken into consideration.
S_161.20			Key transport corridor along Kommetjie main road- conversion of dual carriage way into dedicated bus route from Kommetjie through Masiphumalele, Sunvalley Node, to Fish Hoek CBD/Station -decrease number of cars on already congested roads. Provided stable transport "spine" for "the valley" that intersects with the greater City Rail network that can transport residents, workers, school goers and even tourists effectively and safely.	This dept, and the SDF as proposed takes guidance from our specialists within the Transport dept., which to date does not entertain (re- its modelling exercises etc) a dedicated bus lane scenario. Nonetheless, it is agreed that Kommetjie Road is an increasingly important movement and development route, and that good public transport, and NMT, is becoming increasingly important.
S_161.21			Dedicated cycle routes are needed along all main roads in particular the main road from Muizenberg to Simon's Town and Kommetjie to Fish Hoek. • Schooling needs are unmet and a major traffic contributor- schools on sites such as Dido Valley (behind Harbour Bay view) Noordhoek Sports fields and other areas need to be developed to create a more "self- sufficient area" and stop the daily "trek" over the mountain	Agreed re- NMT proposals, and these statements are included in the draft DSDF. Schooling requirements are guided by the relevant W Cape Education Dept.

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S_161.22			More emphasis and support for delicate ecological areas such as Glencairn and Fish Hoek wetlands is needed as not only areas of education and recreation but climate change mitigation.	The draft DSDF does include appropriate development guidance but not specific for any particular area unless particular differentiating factor/s relative to other similar areas (eg. Silvermine or Clovelly).
S_161.23			Any future development in Marine Oil/ Da Gama Park needs to be done with massive increases in bulk infrastrucur	Future infrastructure provision is carefully planned and matched to current and expected / projected future development in all areas across the city - including this area. The Glencairn area is not a targetted future densification area, however, the policy makes provision for small-scale incremental densification (in areas not targetted for future growth) according to appropriateness to specific site-specific circumstances.
S_161.24			Appendices should be clearly referred to and available for comment	Noted, and this will be reviewed with a view to better 'signage' in the main DSDF report.
S_161.25			Noordhoek Beach (where access is available in Noordhoek) & Glencairn Beach Should be a destination location	Destination places are those where significant primarily recreational-orientated development is encouraged in association with high visitorship numbers. This is not envisaged for these 2 areas (or for eg. Llandudno) as neither is seen as future high visitorship numbers places (as opposed to Fish Hoek or Muizenberg beaches). Re- points 3 & 4- these roads are designated as as scenic drives/routes (& are already declared ito the Scenic Drives Policy).
S_161.26		Transport	Ou Kaap Se Weg should be a designated a scenic drive (M64), from Scarborough to Kommetjie (M65) , The Road from Scarborough to Simonstown to should also be designated a scenic drive. (M65/M64) & All roads leading to Cape Point. (M65/M4)	These are and have been reflected as such.
S_161.27			Figure 6: MSDF Spatial Transformation Areas - Legend very unclear in document – difficult to read – so is Glencairn a consolidated area	This map was purely illustrative, and is being removed from the revised DSDF since it is a MSDF map & doesn't belong in the DSDF.
S_161.28		Transport	Figure 7: New Development Areas – Glencairn expressway excluded on map	Noted, and will be checked to reflect correctly.
S_162	subdistrict- far south		proposals to terminate rail between Fish Hoeh & Simons Town and convert into a Boardwalk, Close Beach Road. Redesign and develop the Area from Main Road to the Promenade as a Tourist Mecca. Built a Taxi Terminus and Shopping Complex around the fish hoek Railway station.	Noted, and this generally aligns with the new draft DSDF proposals
S_163.1	General SDF Issues		The city will not invest in Discouraged growth areas however there are a number of places within this designation that requires investment in biodiversity restoration work, alien invasive clearing, helping establish pollinator corridors and suchlike in order to undo some ill advised human impacts of previous years.	This is broadly referred to in the Environmental (EMF) section (of Ch 3). However, these are largely management related recommendations which are not the domain of a spatial planning development framework.
S_163.2			How do the "critical natural asset areas" differ from the "natural asset areas"?	Same thing. A termonology issue to be straightened out

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S_164	Subdistrict-Scarborough		objects to withdrawal of the Scarborough-Misty Cliffs Structure Plan. blind application of development rules based on plot size is not appropriate here. Without the appropriate guiding vision, Scarborough's unique sense of place as 'a settlement surrounded by a National Park' will be ruined	Noted. Ideally need recommendations of which parts of the policy exactly require keeping - & whether these can be adequately and appropriately incorporated into the new DSDF. Will review Scarborough-Misty Cliffs Structure Plan to see how this can be addressed - or whether indeed this (now dated) policy needs to be retained.
S_165.1	technical report	2.2.2.1-	recommend the following change in the wording of iii Ensure the appropriate management of heritage resources and areas within the City's HPOZ and Proposed HPOZ areas to protect enhance heritage opportunities and minimize any the negative impact on these non renewable resources	Noted, and will review to reflect improved guidance where necessary and as appropriate.
S_165.2		2.2.3.1	rewording. E. Promote and support the uniqueness of different areas : i. Establish, protect and appropriately manage urban heritage conservation areas, cultural landscapes, etc.	Noted, and will review to reflect improved guidance where necessary and as appropriate.
S_165.3		3.1.1 (SPC Table)	Rewording Heritage protection overlay zone areas, and proposed heritage protection overlay zones and individual heritage-graded properties	Noted, and will review to reflect improved guidance where necessary and as appropriate.
S_165.4		3.1.1 (SPC Table)	1. Ensure that new developments in historic precincts and abutting them are of an appropriate scale and in an appropriate architectural 'language' (massing, articulation and texture); and 2.Ensure that advertising signage, roadways, pavements, colonnades,fencing, landscaping and tree planting respect the character of historical buildings, properties and precincts, as far as practically possible	As far as possible this is exactly the intention in applying the MPBL and also taking into account policy consistency and also desirability from a spatial planning perspective (which usually - and ideally - should align).
S_165.5		3.3.1.2 Development corridors	Despite the statement in point 3 that the application of the policy should be considered a guide dependent on local area circumstances and not definitive extents, its application, in practice, often tends to be treated prescriptively. It can also lead to expectations in the development industry which have yet to be balanced against policies such as those relating to heritage (Policy 12) in the MSDF.	Noted. Due process must apply. There will always (by definition given the relativity of the content) be subjectivity in the nature of assessing any proposed development. However, the purpose of policy (in this case the DSDF as part of a package of policy plans) is to minimise discrepancy in assessment and decision-making as far as possible.
S_165.6			Despite the statement in point 3 that the application of the policy should be considered a guide dependent on local area circumstances and not definitive extents, its application, in practice, often tends to be treated prescriptively. It can also lead to expectations in the development industry which have yet to be balanced against policies such as those relating to heritage (Policy 12) in the MSDF.	Repeat point. See s_165.5 above

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S_165.7			wording on p53 should be amended to acknowledge more fully the need for the discretionary application of the policy according to the character and quality of different areas	Noted, and will review to reflect improved guidance where necessary and as appropriate.
S_165.8	Sub-district 3 : Mowbray to Muizenberg,	spatial development objectives,	rewording of Point e (p85)- Important to the vision for this area is nurturing existing and developing new places of distinct character (as opposed to a uniform development pattern). Important to this is the protection and enhancement of its historical sites and precincts which contribute to its special character.	Noted, and will review to reflect improved guidance where necessary and as appropriate.
S_165.9		Supporting development guidelines	rewording in Point 2 of the on p84: Carefully balance urban intensification and densification with urban conservation of significant conservation-worthy buildings, properties and precincts in these areas. (We consider it important to include 'properties' as the sustainable heritage value of a building/dwelling is inextricably linked to the extended space it occupies.)	Noted, and will review to reflect improved guidance where necessary and as appropriate.
S_165.10			rewording in Point 15 of the on p84: Carefully balance urban intensification and densification in core node and corridor areas with urban conservation of important conservation-worthy buildings, properties and precincts. Key areas in this respect are already declared heritage protection overlay zone areas (HPOZ areas as reflected in the DMS) as well as recommended additional potential HPOZ areas and individual heritage-graded properties.	Noted, and will review to reflect improved guidance where necessary and as appropriate.
S_165.11			re- point 20: Parts of Mowbray and Rosebank should be considered as additional potential HPOZ areas. Further detailed local area planning and consensus is required towards refining growth and conservation precincts within these areas to ensure an appropriate balance between urban growth and urban conservation. (It is uncertain as to the meaning of the second sentence above other than to stress the urgent need for the areas already having Proposed HPOZ status to be formalized as HPOZ's. It is also uncertain which parts are referred to in the first sentence but trust that they are the ones we identify and motivate for below)	This is not the responsibility of - or possible for - the SDF. This requires detailed assessment etc. and is work required by the City's Heritage Dept which should be independently approached accordingly.
S_165.12		proposed HPOZ areas to be included in the SDF	Area A : Motivation for Proposed HPOZ status for the The portion of Rosebank bounded by Main Road and the Railway and lying between Alma Road in the north and Burg Road in the south.	Agreed. Included in areas recommended for future HPOZ inclusion - bearing in mind that this should not preclude any future re-development and densification occurring in this and similar areas.
S_165.13			area between the mountain slopes and the Liesbeek River has resulted in this relatively narrow band comprising a rich mix of residential and institutional uses with strong heritage associations- proposed HPOZ	Noted. The DSDF should respect and assist with protection (and enhancement) of character where appropriate. Should be addressed directly by heritage guidance.

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S_165.14			Area B : Strubens Road Area: a block of land in the vicinity of Strubens Road – bounded by Liesbeek Parkway, the Railway and the N2 - comprises a large number of heritage–graded properties.	Noted. Should be addressed directly by heritage guidance.
S_166			Our request is that the SDF process addresses what mechanisms exist to prevent the stealthy subdivision of area of special rural and equestrian character particularly by means of 3rd dwellings & sectional title.	It is arguable whether small-scale subdivision will impact negatively on special rural character. However, this is understood not to be the case re-equestrian area (if a clearly functional area likely to continue into the medium to long term) where a higher density of dwelling units will not easily co-exist with issues associated with equestrian activity (e.g. large properties for holding horses; & odour and fly issues). To this extent there is an argument for identifying a clear contained equestrian area for some form or other of protection (if indeed there is such in this area).
S_167	subdistrict	Nirvana Park	Objection to proposed development of 'Nirvana Park' as residents value & use the area, & dev of medium density small housing would reduce safe green spaces for people to use and enjoy.	(see response for S_5)
S_168.1	Baseline report	Density vs infrast		
S_168.2			Statement that need to move from more zoning-based to more performance-based planning assumes a very high level of professional capacity within the city, and the ability to take independent professional decisions. This is not the case and naive, and will have negative impacts on the landscape, so is opposed as an approach.	There is a general acknowledgement in planning (worldwide) that there should be a move away from a more formulaic 'blue-print' approach to planning (with very distinctive separation of different land uses) to a more 'performance-orientated' approach that supports better performing urban areas generally through permitting a greater mix of land uses as appropriate than was formerly the case. A good example of this is the embracing of CBD areas as not merely commercial centres (which are 'dead' at night) but inclusive also of residential which has resulted in greatly enhanced living, working, and recreational areas. It is likely that, with due regard to the LKID comment, that middle ground on this needs to be found which facilitates better functioning and liveable modern urban areas whilst also ensuring that incapacitised or inadequate management doesn't contradict this and actually undermine and negatively impact these areas.
S_168.3	Map	Heritage	Map on Agric & Cultural landscapes (P40) is incorrect as LKID area is a proposed HPO.	Noted, will amend to reflect if this is the case. Not sure why the layer included did not.
S_168.4	Sub-district	Intensification / densification	The southern part of the LKID area is located with the designated 'Development Focus Area' and should not be as it is a proposed HPO area. The motivation for the Wynberg area DFA is significantly flawed and not supported without significant review.	The DFA was broadly demarcated to include Wynberg CBD area inclusive also of major transport routes into it (which includes Wetton Road) and a ±400m area either side of this as per an important public transport route. The primary purpose of DFAs is to focus, prioritise and highlight the need for co-ordination of multiple (usually long term high order) planned developments (eg. PTI and MyCiti). The coarse designation will be reviewed into the next phase taking into account the comment submitted.

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S_168.5	District	Intensification / densification	The broad pre-occupation with intensification along the development corridor does not consider and respond to local area contexts (such as proposed HPO areas). There is a high risk that this approach will undermine quality urban environments along the corridor. And investors who have gone for high density developments generally focus only on the erf and not contributed to improved environmental quality. Thus broad policy statements such as these are not useful if not accompanied by area-specific guidelines. So LKID does not support these statements unless a local precinct plan for this area is also done (which LKID is happy to assist with preparing).	Although draft DSDf development guidelines do attempt to highlight the need for re-development to include broad improvement to a local area the comment that investors focus only on their erf requires that this guidance be reviewed to see if it can address this concern better. It is being proposed that local area planning (in consultation with local communities) should be occurring on an on-going informal basis between 10 approvals of district SDFs to align visioning and development guidance appropriate to both city reality and imperatives as well as local community area needs and wants.
S_168.6	District	Intensification / densification	Good urban development and environments are predicated on good urban management, but this is increasingly being called into question re- evidence in many areas.	Noted, and acknowledged that this has to come through as a critical pre-condition to a successful SDF policy, inclusive of being supported by all communities.
S_168.7	District	Intensification / densification	LKID doubts the notion that a (good) PTI is a catalyst for high value commercial development being realised in that area. It also doubts the extent of development potential of the Wynberg node	This is not an inference or necessarily proposed development outcome for Wynberg. It is acknowledged that Wynberg won't likely be like Claremont. However, whatever the development outcome this area requires (perhaps more that Claremont or any other CBD area in the corridor) a good PTI and public transport system.
S_168.8	Implementation	Transport	Statement (P15) that the statement that Wetton Road bridge in Wynberg will have dedicated public transport (lanes) is disputed.	Agreed. The draft DSDf will be reviewed and amended where necessary.
S_168.9	Implementation	Transport	What assurance that longstanding road schemes will actually be reviewed?	The SDF has noted this as a concern, which it has proposed their review as a matter of importance in relation development and 'red-tape' (which the former approved 2012 SDF doesn't do).
S_168.10	Implementation	Restructuring map	Too hard to read at this scale	This is to be addressed in time with interactive (zoomable on-line) maps where appropriate.
S_168.11	Implementation	Transport	P46: What does Kenilworth Phase 2A mean? This cannot form the basis of having a part of the LKID area designated as densification zone. Also P49 should also reflect LKID as a proposed HPO.	Noted. This is incorrect and will be amended.
S_168.12	Implementation	Policy	P51: Any proposal to withdraw the Kenilworth Main Road Land Use Management Policy (2007) will not be supported by LKID unless accompanied by a public participation process regarding this.	Noted, and agreed this (re- advertising such withdrawal) is required.
S_168.13	Implementation	Environment	LKID strongly objects to the LKID area being part of a proposed Heritage Exemption Area (P90) since it is already a proposed HPO!	Noted. This is incorrect and will be amended in association with the area correctly being referred to as a proposed HPO.
S_169.1	subdistrict-Far South	spelling	Incorrect spelling "Solole", not "Solele"	Noted. This is incorrect and will be amended.

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S_169.2		Incorrect erf Numbers	erven CA951-25, CA951-39, CA1407-2, CA1407-0-1 now have different erf numbers. The lack of updated erven numbering in this document was both confusing and misleading. • CA951-25: now erf 17772 (rem) and erven 17832-17894 (Willow Wood Estate) • CA951-39: now erf 17775 and erf 17914 (Solole including Kommetjie Road Fire Station) • CA1407-2: now erf 17777 (The Old Homestead) • CA1407-0-1: now erf 17776 (Living Hope)	Noted and updated.
S_169.3		Guidelines	point 8: "Solole, Kommetjie Road: Erven CA951-25, CA951-39, CA1407-2, CA1407-0-1: Size 25.4ha". 1. These properties are grouped together and referred to in one sentence implying to the reader that they are one and the same being "Solole". 2. Only erf CA951-39 is City owned land, and can be referenced as "public ownership" and referred to as "Solole".3. Not all of these properties about the Kommetjie Road.4. Erven CA951-25, CA1407-2, CA1407-0-1 are privately owned.5. Erven CA951-25, CA1407-2, CA1407-0-1 are either currently being developed (plans approved) or have plans and visions for the future.6. The information in the document under the headings "Future Use and Supporting Land Use Guidelines (how and where?)" is accurate only when describing erf CA951-39 being the Solole property.	Noted and updated.
S_169.4		Points to note re- Erf 1047-2 (The Old Homestead)	1. privately owned. 2. Not linked to Solole.3. Heritage status.4. There is an old Cape Dutch Homestead on the property, as well as two other old buildings and a cemetery. The homestead dates back to c. 1745 and is authentically restored and well-preserved. Imhoff's Gift is referred to in the SDSDF page 108, as "an important historical farm complex, one of a few remaining in the Far South". The Old Homestead property has an equally interesting history and was granted by Baron von Imhoff on the same day as Imhoff's Gift. The cemetery has three tombs dating back to the 1800's. Note should be made of this in future SDSDF's. 5.property has a wetland. 6. property backs the Roodeberg mountain and borders with TMNP in the south. 7. It has a dangerous fire prone border with the natural area, namely TMNP (same geographical scenario as Kompanjiesfontein - page 107 SDSDF. 8. urban development and buildings need to mitigate against high fire risk". This will need noting in future SDSDF's.	Noted and updated.
S_169.5		updates to DSD	1. Separating this property from erf 951-39 (Solole). 2. Including the historical status as well as the proposed cultural vision and agriculture for erf 1407-2. 3. Noting that any buildings on erf 1407-2 will be in keeping with, and sensitive to, Cape vernacular. 4. Updating this erf number to erf 17777.	Noted and updated.

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S_170	subdistrict	Constantia	Objection to proposed development of 'Nirvana Park'. Development of the park illegal as per EMA. Important space for overall wellbeing fo the area. Nirvana park is heavily used, safe, and valued by residents and visitors alike.	(see response for S_5)
S_171	subdistrict	Constantia	Objection to proposed development of 'Nirvana Park'. Development of the park illegal as per EMA. Important space for overall wellbeing fo the area. Nirvana park is heavily used, safe, and valued by residents and visitors alike.	(see response for S_5)