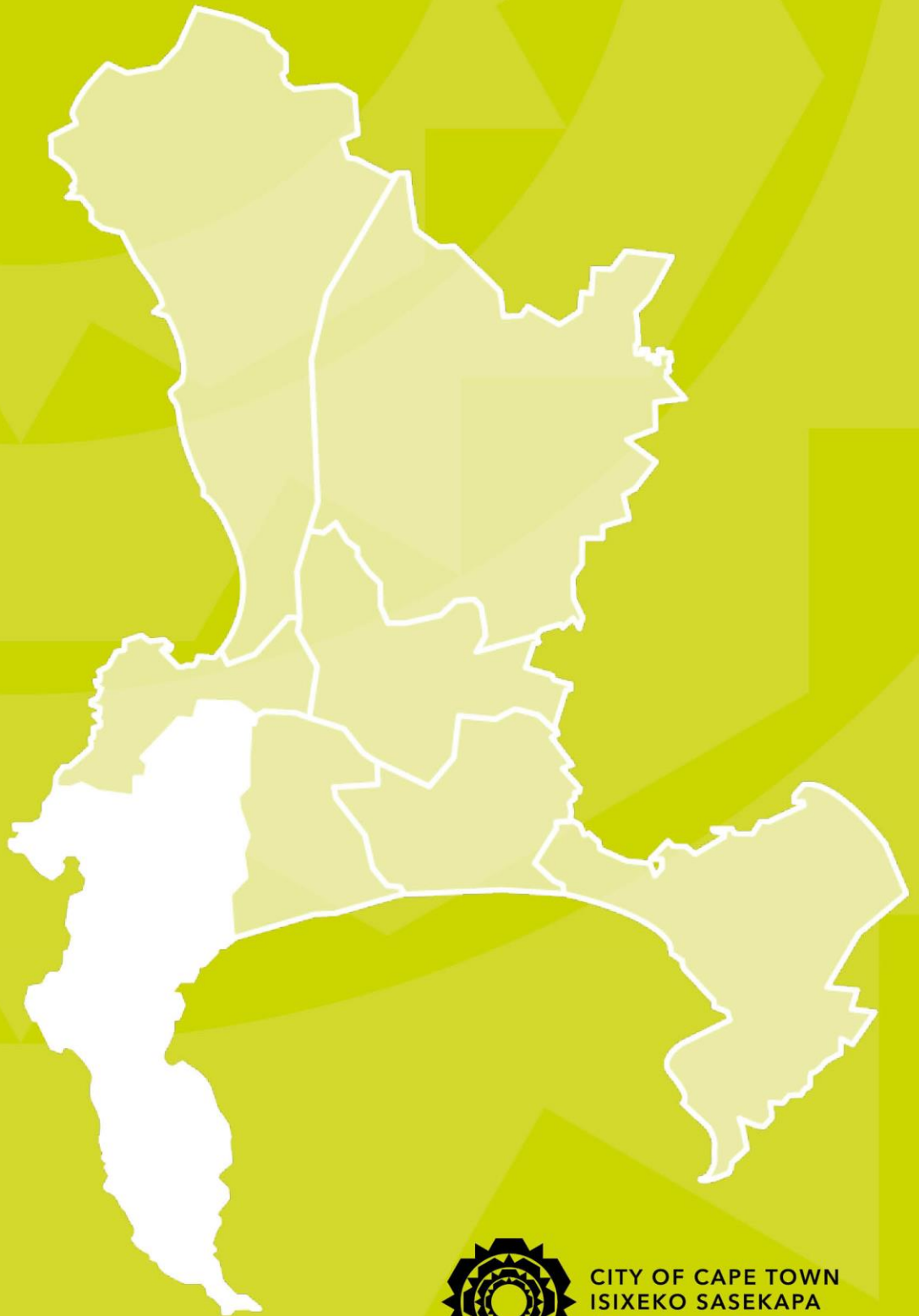


Southern

Integrated district spatial development framework
and environmental management framework

Vol. 4: Annexures



May 2022



CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD

TABLE OF CONTENTS

Technical Annexure 1: Acronyms And Abbreviations.....	4
Glossary of Terms	8
Technical Annexure 2: Scope of the District SDF Review.....	21
Technical Annexure 3: Legal Policy and Context.....	38
Technical Annexure 4: Environmental Management	43
Technical Annexure 5: Ground Water Protection-Potentially Contaminating Activities	61
Technical Annexure 6: Methodology and Definitions for Human Settlements.....	65
Technical Annexure 7: Methodology for Transport Route Designations	74
Technical Annexure 8: Methodology Towards Designation of Nodal Hierarchy and Typologies	81
Technical Annexure 9: Background and Methodology for Spatial Transformation Delineation	99
Technical Annexure 10: Defining Criteria for the Identification of the DFAs and USAs	109
Technical Annexure 11: Land Use Model 2040 Key Assumptions	123
Technical Annexure 12: Implementation Mechanisms Draft Baseline Report.....	132
Technical Annexure 13: Public Comments and Responses	277

LIST OF FIGURES

Figure 1: IDP pillars and transformation priorities	39
Figure 2: 2012 versus 2017 long-term spatial vision	40
Figure 3: The Basic Accessibility Grid	74
Figure 4: The Comprehensive City Accessibility	75
Figure 5: Cape Town's Accessibility Grid (as per CTMSDF, 2018)	76
Figure 7: Spatial anatomy of the Blue Turtle	100
Figure 8: Spatial Transformation Areas.....	103
Figure 9: Types of Property Development	134
Figure 10: Key Tasks	135
Figure 11: Application Process.....	159
Figure 12 Application Process.....	165
Figure 13: Application Process.....	173
Figure 14 Criteria for PT1 and PT2 areas.....	178
Figure 15 Additional criteria for PT1 and PT2 areas.....	178
Figure 16: Existing and Proposed Udz Areas within the City of Cape Town.....	182
Figure 17 Depiction of a typical development application process.....	195

Figure 18 Three step consultative process for applications.....	195
Figure 19 Guidelines for assessing land use applications.....	198
Figure 20 Application Process.....	203
Figure 21 Overview of the relationship between the City, SRA and the member.....	209
Figure 22: Overview of the CLDP Methodology.....	214
Figure 23: Method.....	223
Figure 24: MURP Areas	223
Figure 25 Applying an Overlay Zone	228
Figure 24: Land Readjustment Scheme (Worldbank, 2015)	259
Figure 25: Urban Redevelopment Scheme (Worldbank, 2015)	263
Figure 28: Land Identification Protocol Process Diagram.....	266
Figure 29: CCT Land Pipeline	267

LIST OF TABLES

Table 1: Listed Activities triggered outside Urban Areas but not inside Urban Areas: i.e. the activities below are excluded inside NEMA Urban Areas	50
Table 2: Listed Activities that are different inside and outside Urban Areas	55
Table 3: List of Potentially Contaminating Activities	61
Table 4: Criteria to be used to guide the identification of land for subsidised and gap housing.....	71
Table 5: Criteria for categorisation of informal settlements upgrade/support	73
Table 6: Transport designations and symbology.....	79
Table 7: Alignment and hierarchy of the accessibility grid and areas of intensification	83
Table 8: Transit (Rail and IRT trunk) station precinct typology	84
Table 9: Community services and health precincts per area.....	85
Table 10: Community services within nodal hierarchy.....	88
Table 11: Scale/ Hierarchy of Nodes	91
Table 12: Existing Typologies of Nodes/ Precinct Areas	92
Table 13: Typology and characteristics of Nodes.....	95
Table 14: Role and function, characteristics of nodes.....	97
Table 15: Scoring Matrix.....	147
Table 16: Available Mechanisms and Policy Reference	152
Table 17 Proposed Mechanisms and Expected Timeframes	226
Table 18 Local Application Framework.....	273

TECHNICAL ANNEXURE 1: ACRONYMS AND ABBREVIATIONS

ACRONYM/ ABBREVIATION	FULL TITLE
ACSA	Airport Company South Africa
AOLS	Airport obstacle limitation surfaces
BEPP	Built Environment Performance Plan
BIONET	Biodiversity network
BNG	Breaking New Ground (housing developed in terms of the Integrated Residential Development Programme)
BRT	Bus Rapid Transit
CBA	Critical biodiversity area
CBD	Central business district
CCT	City of Cape Town
CDC	Community Day Centre
CESA	Critical ecological support area
CID	City Improvement District
CLDP	Catalytic Land Development Programme
CMA	Cape Metropolitan Area
CNA	Critical Natural Areas
COVID	Corona virus disease 2019
CPUT	Cape Peninsula University of Technology
CSIR	Council for Scientific and Industrial Research
CTIA	Cape Town International Airport
CTOD	Comprehensive Transport Orientated Development
dBA	Noise level measured in decibel
DFA	Development Focus Areas
DGA	Discouraged Growth Areas as per the MSDF
DMS	Development Management Scheme
DOT	Department of Transport (National)
DSDF	District Spatial Development Framework
du/ha	dwelling units per hectare (density measure)
ECAMP	Economic Areas Management Programme
EFA	Environmental Focus Area

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
GAP	Housing for households earning between R3501- R22 000 per month, and qualifying for a mortgage bond (FLISP subsidy applies)
GIN	Green Infrastructure Network
GIP	Green Infrastructure Programme
GIS	Geographic Information System
GLA	Gross Leasable Area
HIA	Heritage Impact Assessment
HPOZ	Heritage Protection Overlay Zone
ICT	Information communication technology
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
IPTN	Integrated Public Transport Network
IRDP	Integrated Residential Development Programme
IRT	Integrated rapid transit
IT	Information Technology
ITP	Integrated Transport Plan
LAP	Land Assembly Programme
LGTA	Local Government Transition Act
LUM(2020)	Land Use Model (draft 2020)
LUMS	Land use management system
LUPA	Land Use Planning Act(No. 3 of 2014)
MOSS	Metropolitan open space system
MPBL 2015	Municipal Planning By Law, 2015 (City of Cape Town)
MSA	Municipal Systems Act (No 32 of 2000)
MSDF	Cape Town Metropolitan Spatial Development Framework
MTIF	Medium Term Infrastructure Framework

MTREF	Medium Term Revenue and Expenditure Framework
NDAs	New Development Areas
NEMA	National Environmental Management Act (No 107 of 1998)
NHRA	National Heritage Resources Act (No 25 of 1999)
NLTA	National Land Transport Act (No 5 of 2009)
NMT	Non-Motorised Transport
OESA	Other ecological support area
PGDS	Provincial Growth and Development Strategy
PGWC	Provincial Government Western Cape
PHSHDA	Priority Human Settlements Housing Development Area
PIIF	Public Infrastructure Investment Framework
POS	Public open space
PRASA	Passenger Rail Agency of South Africa
PSDF	Provincial Spatial Development Framework
PT	Public Transport
PTP	Public Transport Plan
SAHRA	South African Heritage Resources Agency
SANRAL	South African National Roads Agency Ltd
SANS	South African National Standard
SDF	Spatial Development Framework
SMME	Small, medium and micro enterprises
SPC	Spatial Planning Category
SPLUMA	Spatial Planning and Land Use management Act (Act No. 16 of 2013)
SRA	Special Rating Area
TAP(S)	Transit Accessible Precincts
TIA	Transport Impact Assessment
TOD	Transit orientated development
TPC	Town-planning compliant
TRA	Temporary Relocation Area
UCT	University of Cape Town
UDZ	Urban development zone
UIC	Urban Inner Core as per the MSDF
UISP	Upgrade of Informal Settlement Programme

US	University of Stellenbosch
USA	Urban Support Area
UWC	University of the Western Cape
VPADD	Voluntary proactive deal driven
VPUU	Violence Prevention through Urban Upgrade
WiFi	Wireless Fidelity
WPGSEVI(2020)	Western Cape Provincial Government Socio Economic Vulnerability Index
WSUD	Water-sensitive urban design
WWTW	Waste water treatment works

GLOSSARY OF TERMS

TERM	DEFINITION
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.
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.
Affordability (Housing)	Affordability is a function of context. The National Government determines that the GAP market (those households who should be targeted for affordable housing provision) refers to households earning less than R22 000pm. This Strategy recognises that nominal indicator whilst maintaining that affordability fluctuates dependent on the context in which housing is available; and that it would never be targeted at the highest earning income group of that context (City of Cape Town Approved Human Settlement Strategy., 2021).
Affordable housing	Traditionally affordable housing refers to housing with prices or values below the overall open market value which targets below-average incomes. In this MSDF affordable housing refers to the household income brackets of R3 501 – R18 000 per month, and is inclusive of social, GAP, and inclusionary housing. It also refers to residential units valued at R500 000 or less.
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.
Aquifer Protection Zone (Or Groundwater Protection Zone)	An aquifer protection zone for drinking water supply can be defined as 'the surface and subsurface area surrounding a borehole or wellfield, supplying a public water system, through which contaminants are reasonably likely to move forward and reach such a water or wellfield' (Harter, 2002). Protection zones are put in place to ensure the integrity of the groundwater quality within the aquifer. Furthermore, additional measures need to be considered, such as controlling the activities.

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	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.
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.
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.
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
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 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).
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	Processes including erosion and accretion, storm surges, sea-level rise, dune and estuary mouth migration and the Aeolian movement of sand.
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 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	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	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.
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.

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.
Developable land	Developable land is land falling inside the urban edge of 2016 which was neither developed nor constrained.
Development corridor	Development corridors are broad areas of high-intensity urban development focused predominantly on activity /development routes serviced by mass rapid public transport services (i.e. rail or BRT).
Development Management Scheme (Zoning scheme)	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.
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	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 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.
Ecological services	Services that indirectly accrue from the natural environment, and do not have direct market values, such as flood attenuation, natural drainage and erosion prevention, wastewater management through biological treatment, air quality management and filtration, carbon sequestration, and biodegradable waste disposal.
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 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.
Employed	Persons who work for pay; profit or family gain in the reference period.
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 field 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	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	A situation that exists when people have secure access to sufficient amounts of safe and nutritious food for normal growth, development and an active and healthy life. Food insecurity may be caused by the unavailability of food, insufficient purchasing power, inappropriate distribution, or inadequate use of food at the household level (IPCC 4th assessment).
Form	The layout (structure and urban grain), density, scale (height and massing), appearance (materials and details) and landscape of development.
Functional Area (for the purpose of the CITP)	The Functional Area for the purpose of the Comprehensive Integrated Transport Plan (CITP) is the area of the City, together with the areas of those other municipalities with whom the City has a transport planning relationship. This area has been agreed in the Western Cape Growth and Development Strategy and the Western Cape Land Transport Framework, and is defined in the CITP.
Functional Area (for the purpose of the GCMRSIF)	Functional area to be defined in terms of the Greater Cape Metropolitan Regional Spatial Implementation Framework
Gap housing	Housing for households with a monthly income of between R3 500 and R10 000, who fall outside the government housing subsidy income limit of R3 500 per month, and find it difficult to access housing in the private market.

Green Infrastructure Corridor		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.
Green Infrastructure Network		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 GIN 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 Area		An area identified in terms of S31 of the NHRA as being worthy of protection on the basis of its environmental or cultural interest
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 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 and/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 and/ 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.
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 redistribution	Land redistribution 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, 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 open space system	Inter-connected and managed open space network that supports interactions between social, economic and ecological activities, sustaining and enhancing both ecological processes and human settlements; includes natural areas, and active and passive recreation areas such as sports fields and parks, but also cemeteries, detention ponds servitudes, river corridors and road reserves to promote interconnection and multi-use.
Mitigation (Climate Change)	Means, in the context of climate change, a human intervention to reduce emissions or enhance the sinks of greenhouse gases.
Mixed land use	Area of existing or proposed horizontal and/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	An area earmarked for future development.
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	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	Transformed (e.g. extensive agriculture) sites with conservation importance.
Other 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 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.
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.

Public open space	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	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.
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.
Scenic Drive	A public road designated as a scenic drive; characterized by high quality scenic qualities including background vistas of mountain, open country, coastline or city;
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 and/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 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 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).
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.
Townscape	The distinguishing character of an urban area or urban landscape, usually relating to a neighbourhood or defined geographical area.
Transit-oriented development	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 did 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 edge	Development	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 Integrated Coastal Management Act, (Act No. 36 of 2014).
Urban Zone	Development	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 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 Zone	Restructuring	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.
Vulnerability		The degree to which a system or population is susceptible to, or unable to cope with, adverse events.
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.
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.

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 Municipal Spatial Development Framework

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 municipal spatial development framework

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

(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:

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.

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.

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.

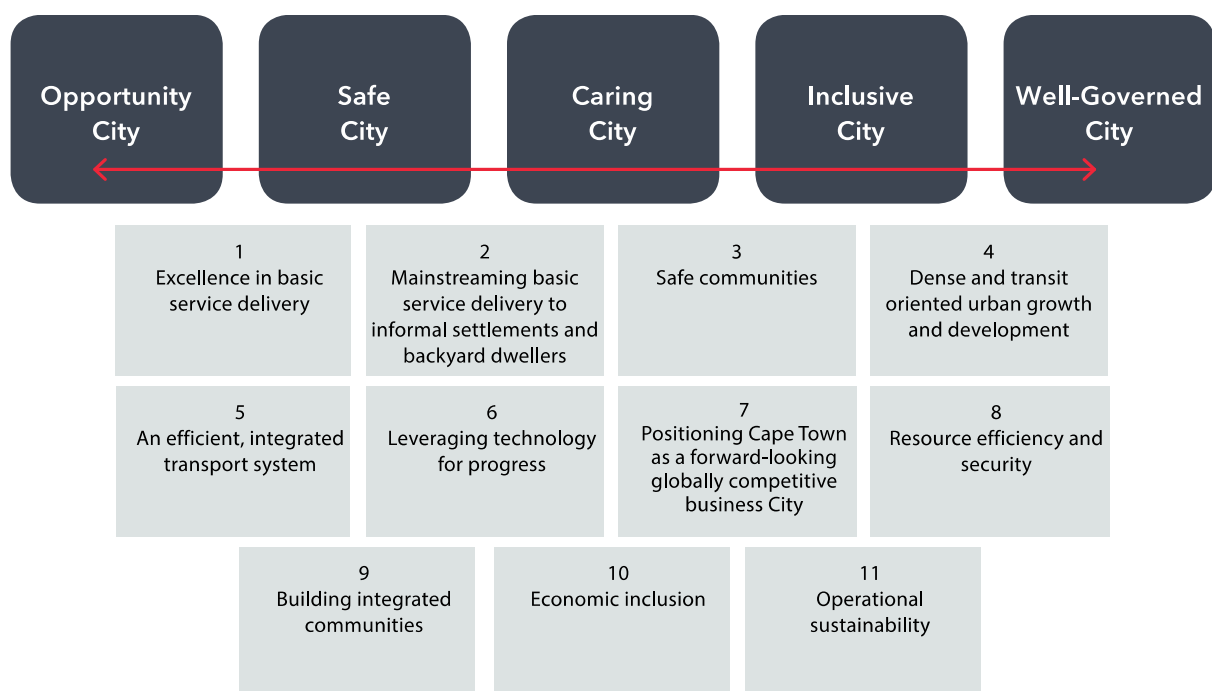


Figure 1: IDP pillars and transformation priorities

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

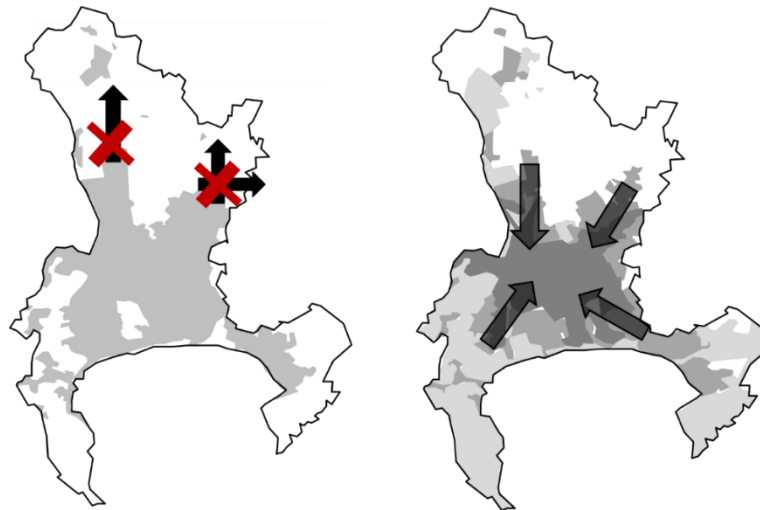


Figure 2: 2012 versus 2017 long-term spatial vision

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.

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 DSP.

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 (GIN), 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 ecological corridors and greenways.

The approach taken to the mapping of the GIN, 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. This layer is intended to be an informant for 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.

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. 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, 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	Ecological questions
7	Does this space have indigenous vegetation? What relative percentage do they 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 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	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	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.

Potential GIN 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. 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 Environment & Heritage 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.

In Addendum 1, there is a list of the activities that are excluded from requiring authorisation when located within an adopted NEMA Urban Area. Please note that the description of these listed activities is summarised, and reference should be made to the complete lists in the EIA Regulations (2014, as amended).

You are thus invited to comment on the proposed Urban Area map in order for us to take into account any key issues the City may not have considered.

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: <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • With an internal diameter of 0,36m or more or • With a peak throughput of 120l/s or more 	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m ² or more endangered or critically endangered indigenous vegetation) and possibly the NWA.
L1, A10	Pipelines for bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes, exceeding 1 000m in length: <ul style="list-style-type: none"> • With an internal diameter of 0,36m or more or With a peak throughput of 120l/s or more	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m ² or more endangered or critically endangered indigenous vegetation) and possibly the NWA. Any development in close proximity to watercourses will require a Water Use Licence (WUL) in terms of NWA.
L1, A12	Construction of dams, weirs, infrastructure or structures exceeding 100m ² in size <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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	<p>Expansion of photovoltaic installations where:</p> <ul style="list-style-type: none"> • Electricity output will be increase by 10MW or more or • Regardless the increased output, the development footprint will be expanded by 1ha or more 	<p>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.</p>
L1, A45	<p>Expansion of water or storm water pipelines where existing infrastructure:</p> <ul style="list-style-type: none"> • Has an internal diameter of 0,36m or more or • Has a peak throughput of 120l/s or more and <ul style="list-style-type: none"> ○ 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. 	<p>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.</p>
L1, A46	<p>Expansion of sewage, effluent, process water, waste water, return water, industrial discharge or slimes pipelines where existing infrastructure:</p> <ul style="list-style-type: none"> • Has an internal diameter of 0,36m or more or • Has a peak throughput of 120l/s or more and <ul style="list-style-type: none"> ○ Where the facility or infrastructure is expanded by more than 1 000m in length or <p>Where the throughput capacity of the facility or infrastructure will be increased by 10% or more.</p>	<p>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.</p>

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: <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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	<p>Development of dams, weirs, infrastructure or structure with a footprint exceeding 10m² where development occurs:</p> <ul style="list-style-type: none"> • Within a watercourse, • In front of a development setback, • If no development setback has been adopted, within 32m of the watercourse. 	<p>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.</p>
L3, A19	<p>Expansion of runways or aircraft landing strips where the expanded aircraft of landing strip will be longer than 1,4km in length.</p>	<p>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.</p>
L3, A20	<p>Expansion and related operation of above ground cableways and funiculars where the development footprint will be increased.</p>	<p>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.</p>
L3, A23	<p>Expansion of dams, weirs, structures or infrastructure by 10m² where expansion occurs</p> <ul style="list-style-type: none"> • Within a watercourse, • In front of a development setback, • If no development setback exists, within 32m of the watercourse. 	<p>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.</p>

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 <ul style="list-style-type: none"> • 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 300m ² 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: <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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 300m ² 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: <ul style="list-style-type: none"> • 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 300m ² 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.	<p>Will trigger:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>
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.	<p>Will trigger:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>

L3, A11	Development of tracks or routes for testing, recreational use or outdoor racing of motor powered vehicles.	<p>Will trigger in:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>
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.	<p>This will trigger:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>
L3:A16	Expansion of reservoirs where the capacity will be increased by more than 250m ³ .	<p>This will trigger in:</p> <ul style="list-style-type: none"> • 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.

		<p>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.</p>
L3, A17	Expansion of a resort, lodge, hotel, tourism or hospitality facility.	<p>Will trigger:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>
L3, A18	Widening of a road by more than 4m or lengthening of a road by more than 1km.	<p>Will trigger if:</p> <ul style="list-style-type: none"> • 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 <p>This listed activity may not trigger inside an urban <u>area if indigenous vegetation is removed</u> 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.</p>

L3, A21	Expansion of tracks or routes for the testing, recreational use or outdoor racing of motor powered vehicles.	<p>Will trigger if:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>
L3, A22	Expansion and related operation of facilities or infrastructure for the storage or storage and handling of dangerous goods.	<p>Will trigger if:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>

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	<p><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</p> <p><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</p>	

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

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 waters; 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

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
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		
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	N/A	9m ²	N/A	N/A		

	covered by HSDG for top structures and USDG for services.						
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							
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	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			

	planning and needs assessment.	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 may then apply for housing construction assistance through the other National Housing Programmes	R0 - R3 500	40m ²	N/A			
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)			

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	<p>The land identified should:</p> <ul style="list-style-type: none"> • 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	<p>The land identified should:</p> <ul style="list-style-type: none"> • 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	<p>The land identified should:</p> <ul style="list-style-type: none"> • 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	<p>The identified land should:</p> <ul style="list-style-type: none"> • 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.

Principle	Subcomponents
Take the beneficiaries' economic and social wellbeing into account	<ul style="list-style-type: none"> • When identifying land, and providing infrastructure and shelter for the un-housed and poorly housed, it is 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.

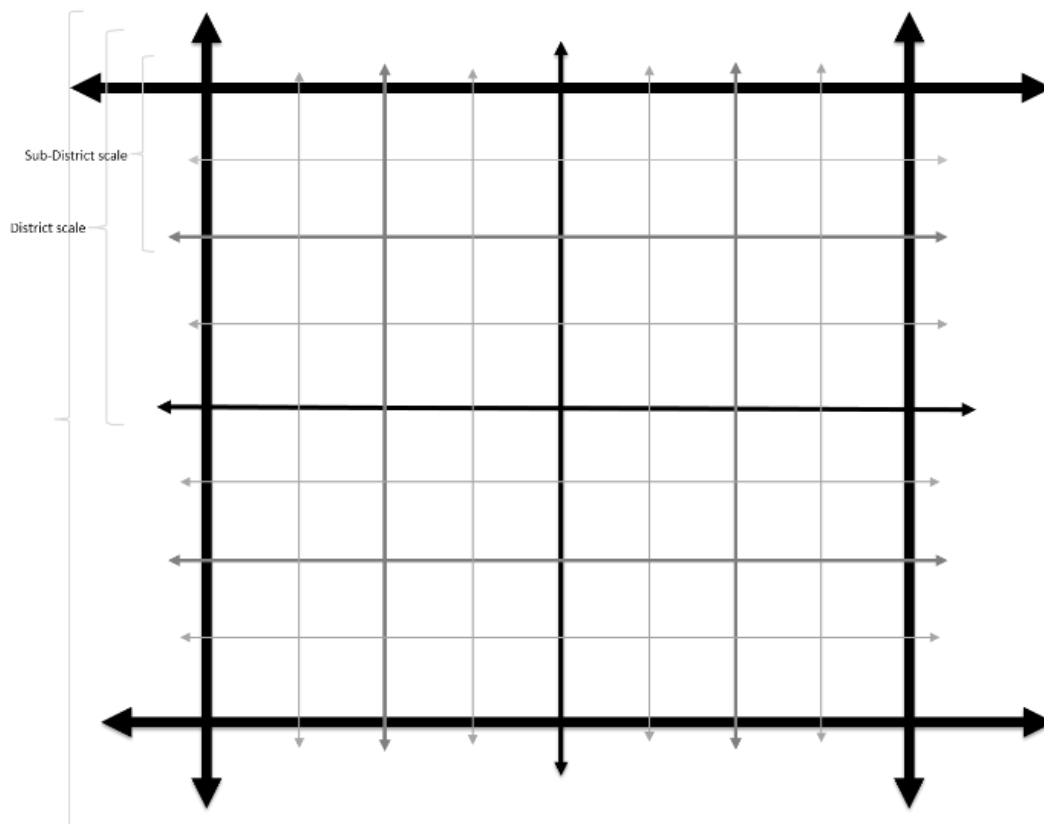


Figure 3: The Basic Accessibility Grid

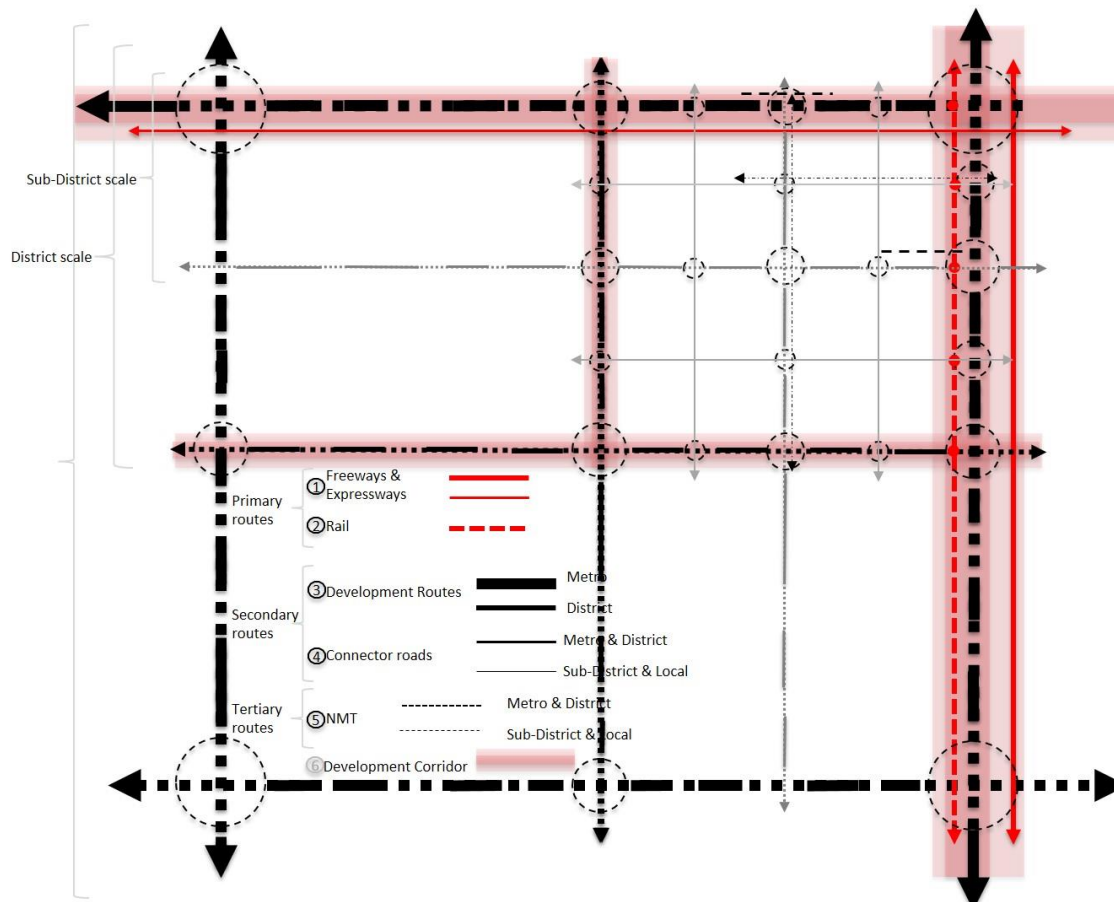


Figure 4: The comprehensive City Accessibility

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.

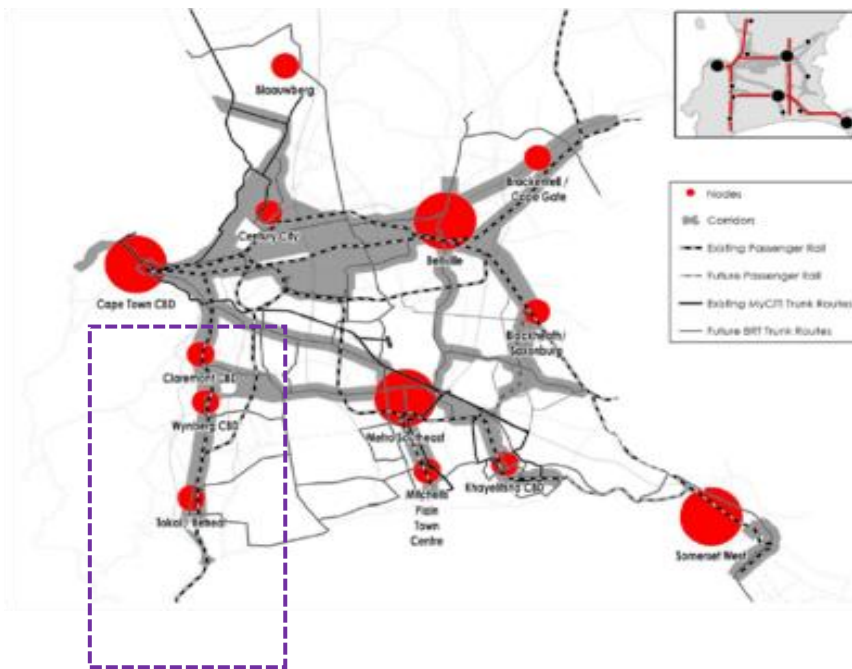


Figure 5: Cape Town's Accessibility Grid (as per CTMSDF, 2018)

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.

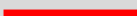



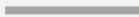





E. Development Corridors:

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

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.

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 DSDF.

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 DSDF 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 Spatial Plan 2012

The 2012 DSP 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.

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.

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

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.

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.

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.

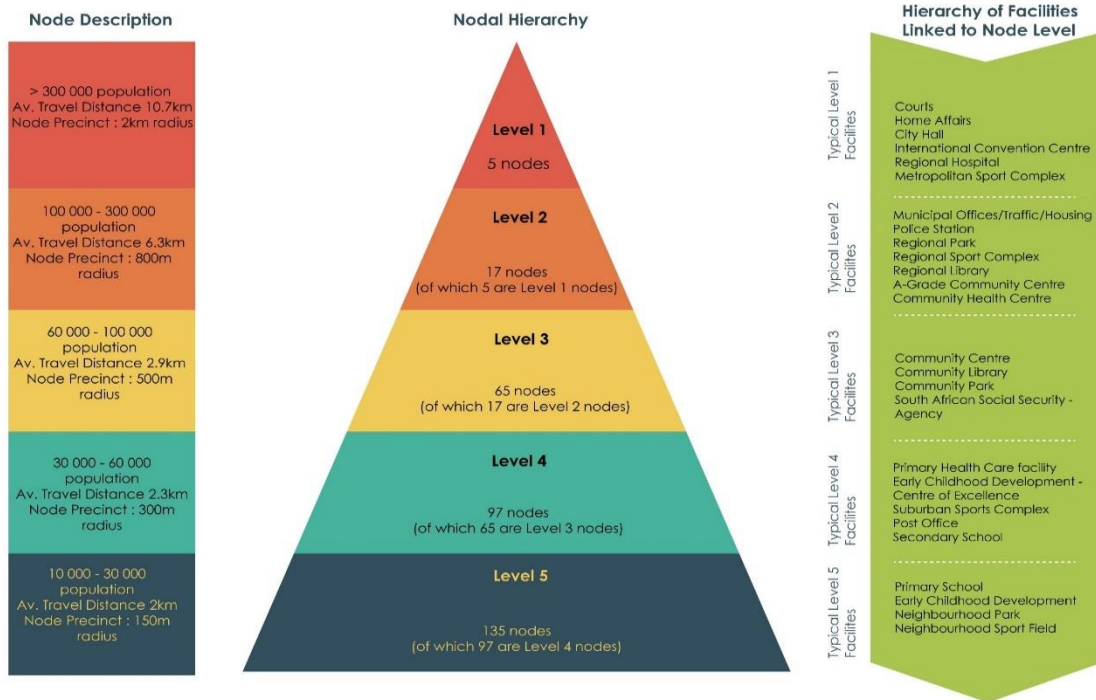
Establishing such a hierarchy assists in allocating facilities of various types to their most appropriate locations based on the required access distances, facility threshold and the appropriate number of people required for service efficiency within the service catchment area of that facility. To operate 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 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.

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	<ul style="list-style-type: none"> ✓ City Hall ✓ International sports venue ✓ International conference centre ✓ High court ✓ City headquarters ✓ Tertiary hospital(L3) ✓ Prov & Nat Gvmnt offices (Head offices) ✓ University ✓ Reference Library 	<ul style="list-style-type: none"> ✓ 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 	<p>OPTIONAL for larger L2 nodes <350 000 people; selected L1 services to be provided</p> <ul style="list-style-type: none"> ✓ 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 	<ul style="list-style-type: none"> ✓ Community Hall ✓ Local library ✓ Community Hall/CDC ✓ Home for the aged ✓ Sports complex – district ✓ District Park ✓ Children's home ✓ Police station 	<ul style="list-style-type: none"> ✓ ECD – centre of excellence hubs ✓ Primary health clinic ✓ Post office ✓ Suburban sports complex ✓ Secondary school ✓ Community Park 	<ul style="list-style-type: none"> ✓ 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 (DSP)	
SOURCE	CSIR	DSP	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	<ul style="list-style-type: none"> ✓ 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	<ul style="list-style-type: none"> ✓ 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 DSP)
CIVIC PRECINCT	<ul style="list-style-type: none"> ✓ 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	<ul style="list-style-type: none"> ✓ 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 2012DSP 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

- Focused 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 DSP 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, Platteklouf, Delft	<ul style="list-style-type: none"> ✓ 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	<ul style="list-style-type: none"> ✓ 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)	<ul style="list-style-type: none"> ✓ 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.

DRAFT

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	<ul style="list-style-type: none"> ✓ 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. 	<ul style="list-style-type: none"> ✓ 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). 	<ul style="list-style-type: none"> ✓ 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). 	<ul style="list-style-type: none"> ✓ 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).

<p style="text-align: center;">OPPORTUNITIES</p>	<ul style="list-style-type: none"> ✓ 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. 	<ul style="list-style-type: none"> ✓ 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. 	<ul style="list-style-type: none"> ✓ 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. 	<ul style="list-style-type: none"> ✓ 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 MSDF (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 MSDF (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.

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

The Spatial Anatomy of the (Blue) Turtle

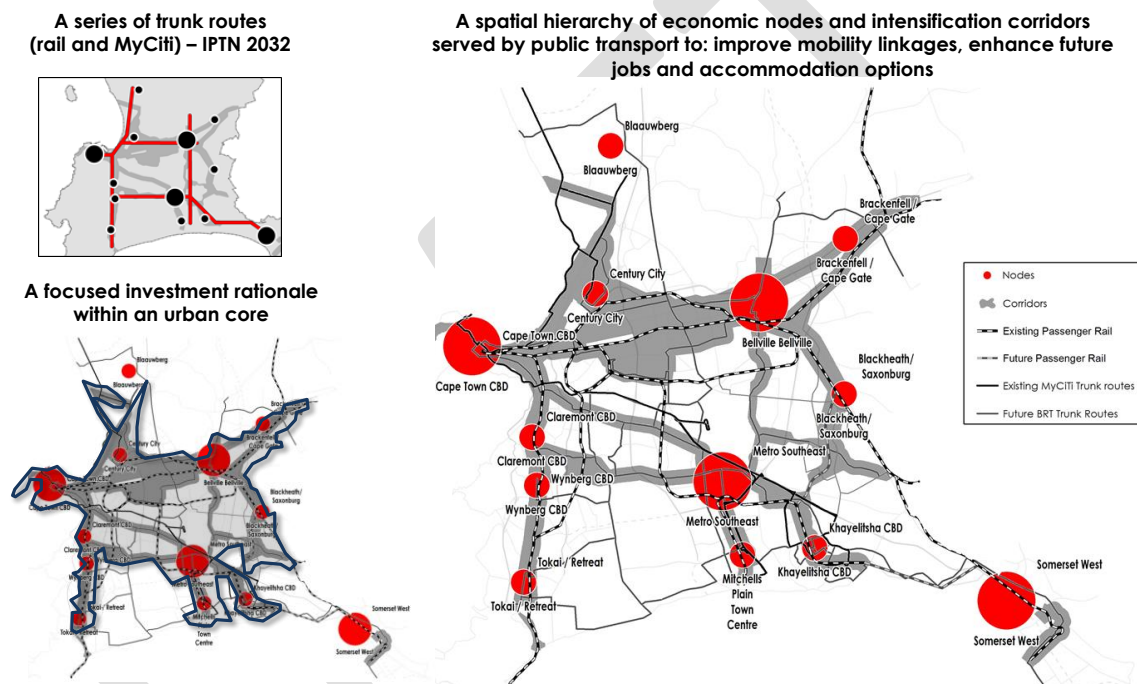


Figure 6: Spatial anatomy of the Blue Turtle

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.

9.4. 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).

9.5. 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.

9.6. 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.

9.7. 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.

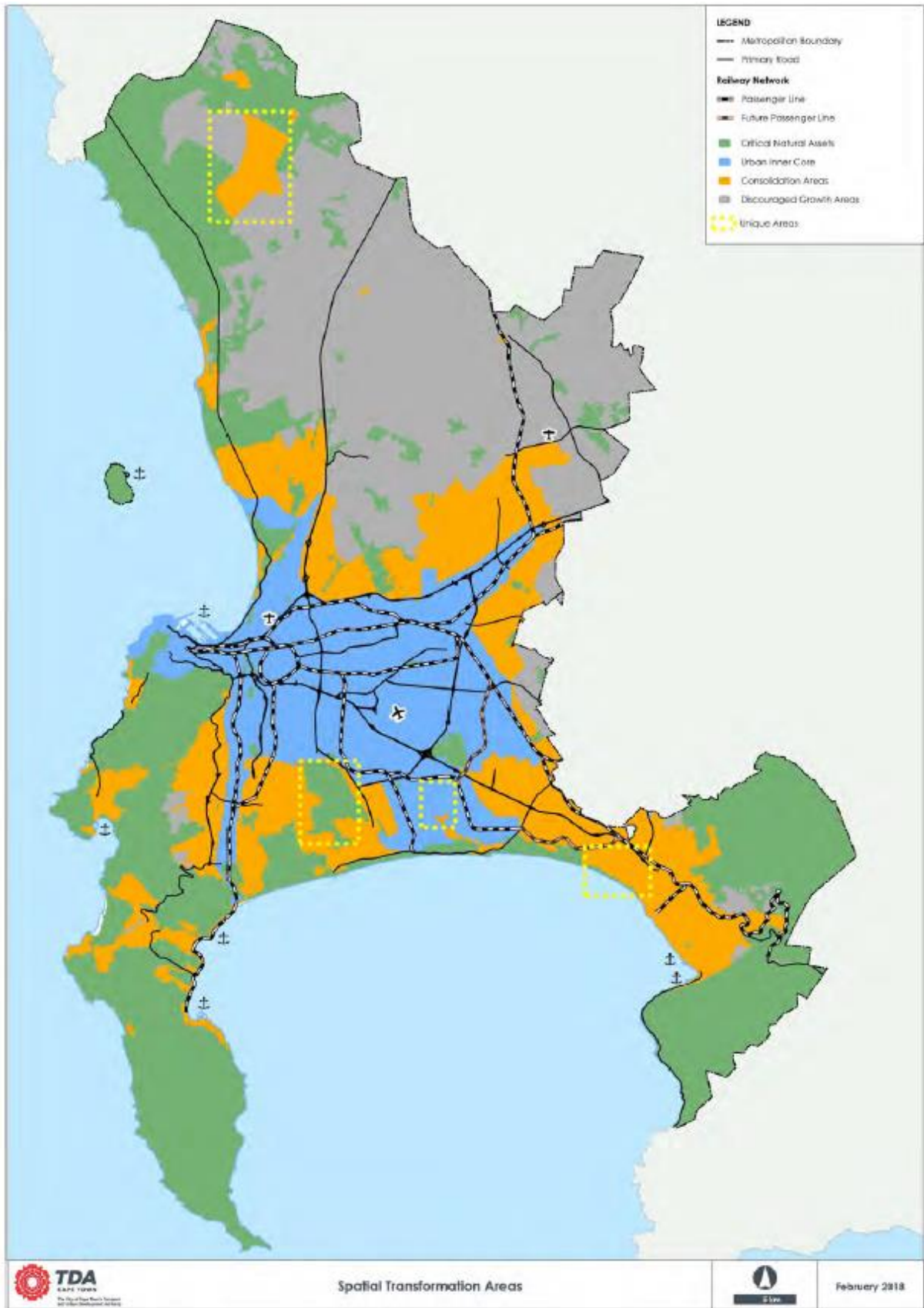


Figure 7: Spatial Transformation Areas

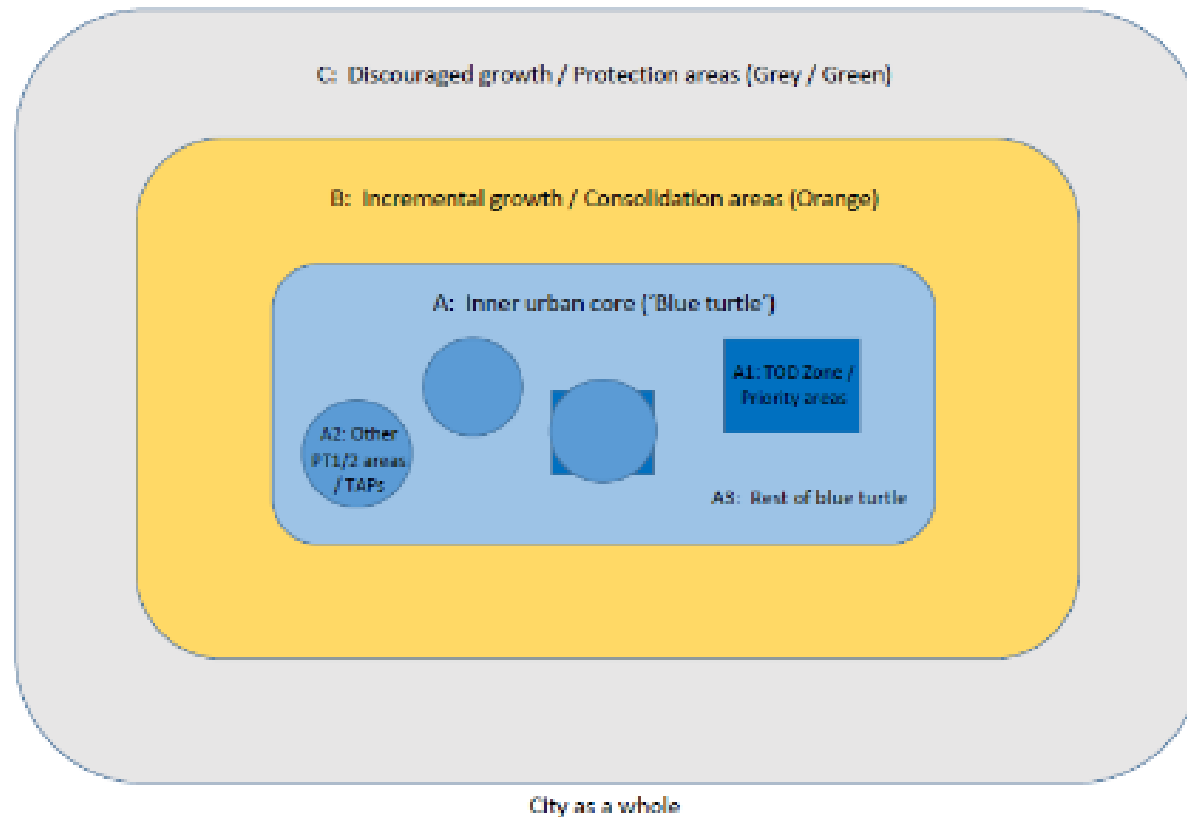
9.8. Guidelines for delineation

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	<p>1. Preamble:</p> <p>The delineation of the Urban Inner Core will remain as an informant in the DP (meaning a first priority for bulk services provision).</p> <p>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. 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 being prioritized to facilitate development. (Note that these areas should be inside the MSDF delineation).</p> <p>The DFAs are to be prioritized for redevelopment and further intensification/ <i>investigation</i> where applicable.</p>	
	<p>Demarcation of Development Focus Areas:</p>	<p>TAP's, PTI's PT 2 areas are also a guiding tool. Land use overlays or incentive mechanisms such as the UDZ, Heritage exemption</p>

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;

	<ul style="list-style-type: none"> • 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). 	
	<p>2. What the focus for identification & delineation should be:</p> <ul style="list-style-type: none"> • 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 DSDF (+- 10 years). <ul style="list-style-type: none"> ○ 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 MSDF and TOD objectives (i.e. within nodes and along development corridors). • Specifically, delineated priority areas i.e. not entire suburbs or corridors. 	<ul style="list-style-type: none"> • NDAs from Land Use Model • Cadastrally-defined Nodes • Cadastrally-defined Structuring Corridors
	<p>3. What the focus for identification should not be:</p> <ul style="list-style-type: none"> • 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, Platteklouf 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.	

	<p>9. There may be exceptional cases that relate back to drafting the MSDF where agreements have been resolved afterwards</p>											
<p>C. Defining the Coastal edge</p>	<p>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.</p> <p>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:</p> <table border="1" data-bbox="526 595 1832 1034"> <thead> <tr> <th data-bbox="526 595 757 667">ENVIRONMENTAL SUBTHEME</th> <th data-bbox="757 595 958 667">LAWS / POLICY</th> <th data-bbox="958 595 1077 667">AUTHORITY</th> <th data-bbox="1077 595 1397 667">PRINCIPLE THAT APPLIES WHEN CONSIDERING ALLOCATION OF DEVELOPMENT RIGHTS</th> <th data-bbox="1397 595 1832 667">EXCEPTIONS</th> </tr> </thead> <tbody> <tr> <td data-bbox="526 667 757 1034">Coastal Edge Maps 5a, b and d</td> <td data-bbox="757 667 958 1034">Integrated Coastal Management policy and Climate Change Policy (draft), Coastal Economic and Spatial Strategic Framework (draft) and Coastal Management Bylaw (draft).</td> <td data-bbox="958 667 1077 1034">CCCI</td> <td data-bbox="1077 667 1397 1034"> <p>Urban development is precluded on the seaward side of the declared coastal edge.</p> <p>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.</p> <p>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.</p> </td> <td data-bbox="1397 667 1832 1034"> <p>The coastal edge has made provision for development opportunities at strategically located identified coastal nodes such as Silberboomsstrand, Strandfontein, Mmandi, Manwabisi and Kapteinsklop.</p> <p>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.</p> <p>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 finalized.</p> </td> </tr> </tbody> </table> <p>2. The demarcation should be; <i>“As per the approved 2018 MSDF and in line with the Integrated Coastal Management Act, Act 36 of 2014, Section 25.”</i></p> <p>3. The base info layer on the delineation as per the MSDF is available from the Urban Management Branch.</p>	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	<p>Urban development is precluded on the seaward side of the declared coastal edge.</p> <p>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.</p> <p>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.</p>	<p>The coastal edge has made provision for development opportunities at strategically located identified coastal nodes such as Silberboomsstrand, Strandfontein, Mmandi, Manwabisi and Kapteinsklop.</p> <p>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.</p> <p>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 finalized.</p>	
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	<p>Urban development is precluded on the seaward side of the declared coastal edge.</p> <p>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.</p> <p>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.</p>	<p>The coastal edge has made provision for development opportunities at strategically located identified coastal nodes such as Silberboomsstrand, Strandfontein, Mmandi, Manwabisi and Kapteinsklop.</p> <p>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.</p> <p>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 finalized.</p>								

TECHNICAL ANNEXURE 10: DEFINING CRITERIA FOR THE IDENTIFICATION OF THE DFAS AND USAS

10.1 Development Focus Areas (DFAs)

Defining criteria for the identification & delineation of DFAs

For the timeframe of the District Spatial Development Framework and in particular 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.

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 prioritized to facilitate development.

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 will be 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 form of 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.	<ul style="list-style-type: none"> • STAs • Development Corridors • Nodes
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 (i.e. LASDFs, Precinct Plans etc). (Planning work should at least commence within the lifespan of the DSDF – 10 years.	<ul style="list-style-type: none"> • CLDP • Integration Zone Priority Areas and Precincts • Approved LASDFs • Future Local Area or Precinct Planning Priorities identified in the DSDF

<ul style="list-style-type: none"> 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 East (not sure about Foreshore) b. prioritized precincts or local areas in the Integration Zones c. 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. 	
<p>3. Areas should be considered accessible in line with the City's MSDF and TOD objectives.</p>	<ul style="list-style-type: none"> • IPTN (Integrated Public Transport Network); • PRow (Public Right of Way) • Transit Accessibility Precincts • Key development routes and connector route and intersections

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 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.
- Areas for environmental conservation and or investigation.

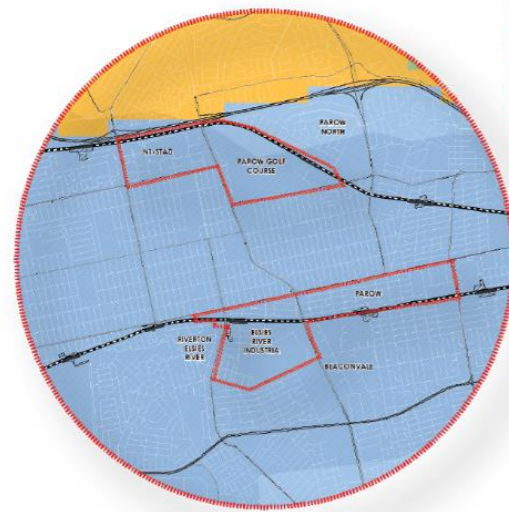
STEP 2: VERIFICATION

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.

DRAFT

Development Focus Areas - Criteria

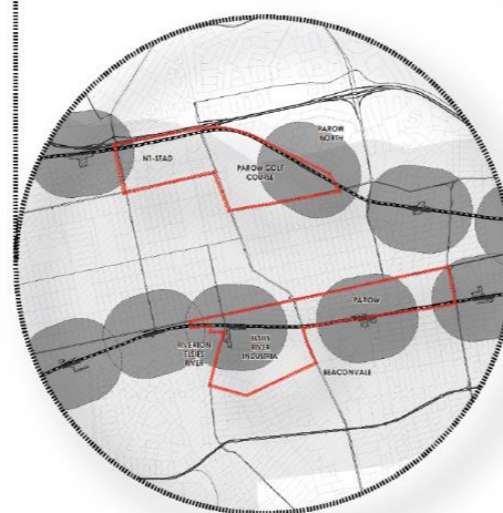
	Urban Restructuring / Transformative Potential	High Levels of Accessibility	Dedicated Funding, Planning or Investment (<10 years)	Multi-Sectoral Focus	Priority Areas			Final Selection	Comment
	Qualitative - Location Potential / Spatial Vision	IPTN (PT Activity Levels) and PROW Networks	Future Local Area/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



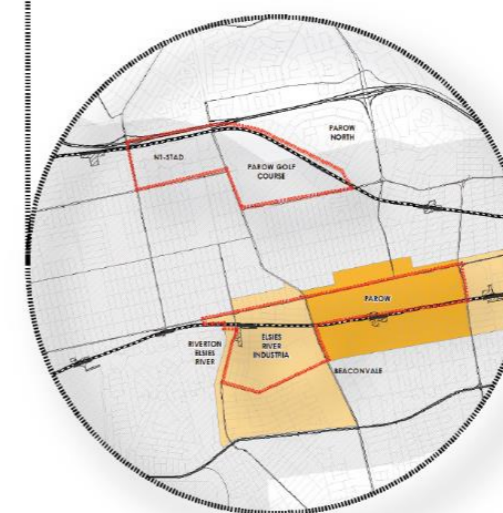
- ✓ Urban Inner Core
- ✓ Development Corridor
- ✓ Node



- ✓ 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)

10.2 Urban Support Areas (USAs)

Defining criteria for the identification & delineation of USAs

The Urban Support 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.

STEP 1: IDENTIFICATION & DELINEATION

A. Identification Criteria

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

Criteria	Data
1. Areas of high socio-economic need / vulnerability	<ul style="list-style-type: none"> • Social Vulnerability Index <ul style="list-style-type: none"> ◦ 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)
2. Areas with a combination of service delivery challenges / built environment need.	<ul style="list-style-type: none"> • MTIF 2015 (COCT) Infrastructure constrained areas supplemented with DSD updates <ul style="list-style-type: none"> ◦ Concern regarding replicability / reliability of dataset
3. Areas with a need for coordination: <ul style="list-style-type: none"> a. 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 b. 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. 	<ul style="list-style-type: none"> • Qualitative Input from District Planner

B. Delineation Guidelines

- 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, MVSD 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.

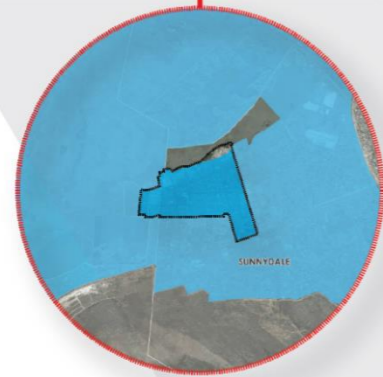
The area needs to fit the criteria above and be a place where ADDITIONAL support to the usual processes is required.

STEP 2: VERIFICATION

Once the planners have identified and delineated their 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.

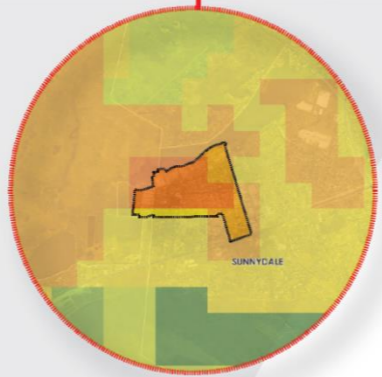
Urban Support Areas - Criteria

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



Severe Lack of Infrastructure Capacity

+



High Socio Economic Vulnerability

=



Combined Scoring



Delineated USA

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)	✓	✗	✓	✗	–	–	–	✓	✓	

DRAFT

Urban Support Areas - Criteria

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

DRAFT

10.3 Environmental Focus Areas (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.

Defining criteria for the identification & delineation of EFAs

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 DSDP lifespan.
3. Priority Area Alignment (i.e. DFAs, USAs, 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

D. 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	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none"> • Dedicated Funding, Planning or Investment (<10 years) <ul style="list-style-type: none"> ○ within the 3 year MTREF period • Planning for Funding/ in process or to be applied for <ul style="list-style-type: none"> ○ within the 5-10 year IDP and DSDF lifespan.
Priority Area Alignment (i.e. DFAs, USAs, Destination Places or new EFAs based on options provide).	<ul style="list-style-type: none"> • Development Focus Areas • Urban Support Areas • Destination Places • Environmental Focus Areas

E. 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 DFAs and USAs, preferably state-owned (i.e. municipal, provincial, national). Areas within formally protected areas will only be considered where prioritisation is strongly motivated and verified.

F. 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.

DSD 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)						
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 DSD Environmental Focus Area		Final Selection	Comment
					✓	✓	✓	✓	<div style="display: flex; justify-content: space-between;"> New demarcation required X </div>		

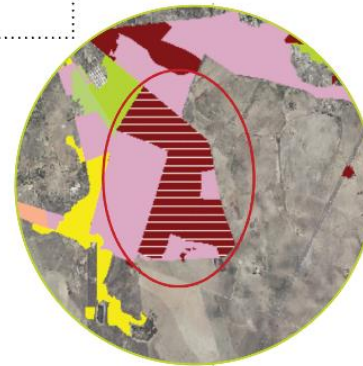


✓
'Urban restructuring' /highest potential transformative impact

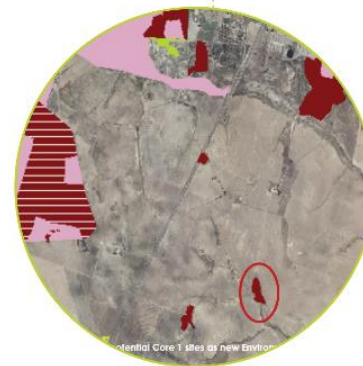
✓
Service Delivery/Built Environment/Socio-economic Need and Vulnerability



✓
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.



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

		DSDF Environmental Focus - Criteria										
District	Project / Programme Area	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		
		<i>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.</i>	<i>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.</i>	<i>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.</i>	<i>Within the 3-5 year MTREF</i>	<i>Within 5-10 year IDP and DSDF Lifespan</i>	<i>'Urban restructuring' /highest potential transformative impact</i>	<i>Service Delivery/Built Environment/Socio-economic Need and Vulnerability</i>	<i>Coastal, Natural or Urban Special Places or Potential Destination Place</i>	<i>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.</i>		<i>Justification / notes / other</i>
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	Adderley Street Fountain Precinct	X				X		CBD			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 Lettable 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 Lettable 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	<ul style="list-style-type: none"> 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)	<ul style="list-style-type: none"> 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). It was assumed that the growth of the additional dwelling formal will mimic the growth of formal main dwellings, i.e. flat line growth. 	87,973	15%
Informal dwelling	<ul style="list-style-type: none"> Informal dwelling unit growth was developed from projecting the baseline. Baseline was sourced from actual counts in Areas of Informality. 	167,298	28,5%

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).

	<ul style="list-style-type: none"> 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. 		
Additional dwelling informal (ADI)	<ul style="list-style-type: none"> Additional dwelling informal unit growth was projected using the 2012 to 2018 General Household Survey 2018 data. ADI unit growth is expected to increase over time and is likely to fill the formal supply gap in providing affordable rental housing. 	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	<ul style="list-style-type: none"> 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 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
Office	<ul style="list-style-type: none"> 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; 	1,420,000
Industrial	<ul style="list-style-type: none"> 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 a major informant of local potential and growth – and the forecast is not good!⁸
- Historic trend lines (7 years of flat-lined growth) are less useful now given the COVID-19 impacts and technical recession as major generational disruptors.
- Low growth scenario figures were used in calibrating projections.
- 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	<ul style="list-style-type: none"> • Increased technological advancement/automation • Artificial Intelligence, Internet of Things • Sharing Economy • Online staffing • Peer-to-peer accommodation • Music and video streaming 	<ul style="list-style-type: none"> • Less demand for manufacturing floor space (technological advances) • Less demand for office space (AI) • Less demand for hospitality (Airbnb) • 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	<ul style="list-style-type: none"> • Competition for talent/skills • Company cost-cutting measures • COVID-19 lockdown may entrench remote working in more sectors 	<ul style="list-style-type: none"> • Less demand for office space • Greater demand for co-working office space
Rapid Urbanisation	<ul style="list-style-type: none"> • Increased densification/congestion • African population growth with high levels of African and domestic migration into Cape Town 	<ul style="list-style-type: none"> • Greater demand: <ul style="list-style-type: none"> ○ housing and services ○ mixed use buildings ○ retail space • Lower demand per employee for office space

⁸ 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	<ul style="list-style-type: none"> • De-materialisation • Environmental Awareness • Water scarcity • Electricity supply challenges 	<ul style="list-style-type: none"> • Lower demand for retail space • Greater demand manufacturing (green) in Cape Town • Greater demand for renewable energy generation
Regulatory Environment	<ul style="list-style-type: none"> • Land reform • Inclusionary housing 	<ul style="list-style-type: none"> • Lower demand for agricultural or manufacturing Land Uses • Lower demand for new developments

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 ⁹	2020-2040 (%)
Formal dwelling	<ul style="list-style-type: none"> • 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.¹⁰ 	208,053	35.4%
Additional dwelling formal (ADF)	<ul style="list-style-type: none"> • 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 units¹¹ 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. 	87,973	15%

⁹ 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).

¹⁰ (Stats SA, 2020) and WCG (Human Settlements Annual Reports 2011/12 to 2018/19).

¹¹ Assumes each additional dwelling formal has one household.

	<ul style="list-style-type: none"> 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). 		
Informal dwelling	<ul style="list-style-type: none"> 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) ¹². Assumption¹³ 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. 	1 67,298	28,5%
Additional dwelling informal (ADI) (previously referred to as backyarder units constructed out of temporary materials)	<ul style="list-style-type: none"> 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.

¹² Informal settlement roof counts, Informal Settlements Department, City of Cape Town.

¹³ 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.

Dwelling Type	Assumption Notes	2020-2040 Totals (GFA)
Retail	<ul style="list-style-type: none"> 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
Office	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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!¹⁴
- 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	<ul style="list-style-type: none"> Increased technological advancement/automation 	<ul style="list-style-type: none"> Less demand for manufacturing floor space (technological advances)

¹⁴ 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%

	<ul style="list-style-type: none"> • Artificial Intelligence, Internet of Things • Sharing Economy • Online staffing • Peer-to-peer accommodation • Music and video streaming 	<ul style="list-style-type: none"> • Less demand for office space (AI) • Less demand for hospitality (Airbnb) • 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	<ul style="list-style-type: none"> • Competition for talent/skills • Company cost-cutting measures • COVID-19 lockdown may entrench remote working in more sectors 	<ul style="list-style-type: none"> • Less demand for office space • Greater demand for co-working office space
Rapid Urbanisation	<ul style="list-style-type: none"> • Increased densification/congestion • African population growth with high levels of African and domestic migration into Cape Town 	<ul style="list-style-type: none"> • Greater demand: <ul style="list-style-type: none"> ○ housing and services ○ mixed use buildings ○ retail space • Lower demand per employee for office space
Climate Change and Resource Scarcity	<ul style="list-style-type: none"> • De-materialisation • Environmental Awareness • Water scarcity • Electricity supply challenges 	<ul style="list-style-type: none"> • Lower demand for retail space • Greater demand manufacturing (green) in Cape Town • Greater demand for renewable energy generation
Regulatory Environment	<ul style="list-style-type: none"> • Land reform • Inclusionary housing 	<ul style="list-style-type: none"> • Lower demand for agricultural or manufacturing Land Uses • Lower demand for new developments

TECHNICAL ANNEXURE 12: IMPLEMENTATION MECHANISMS

DRAFT BASELINE REPORT

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.

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.

DRAFT

12.1 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 8 below.

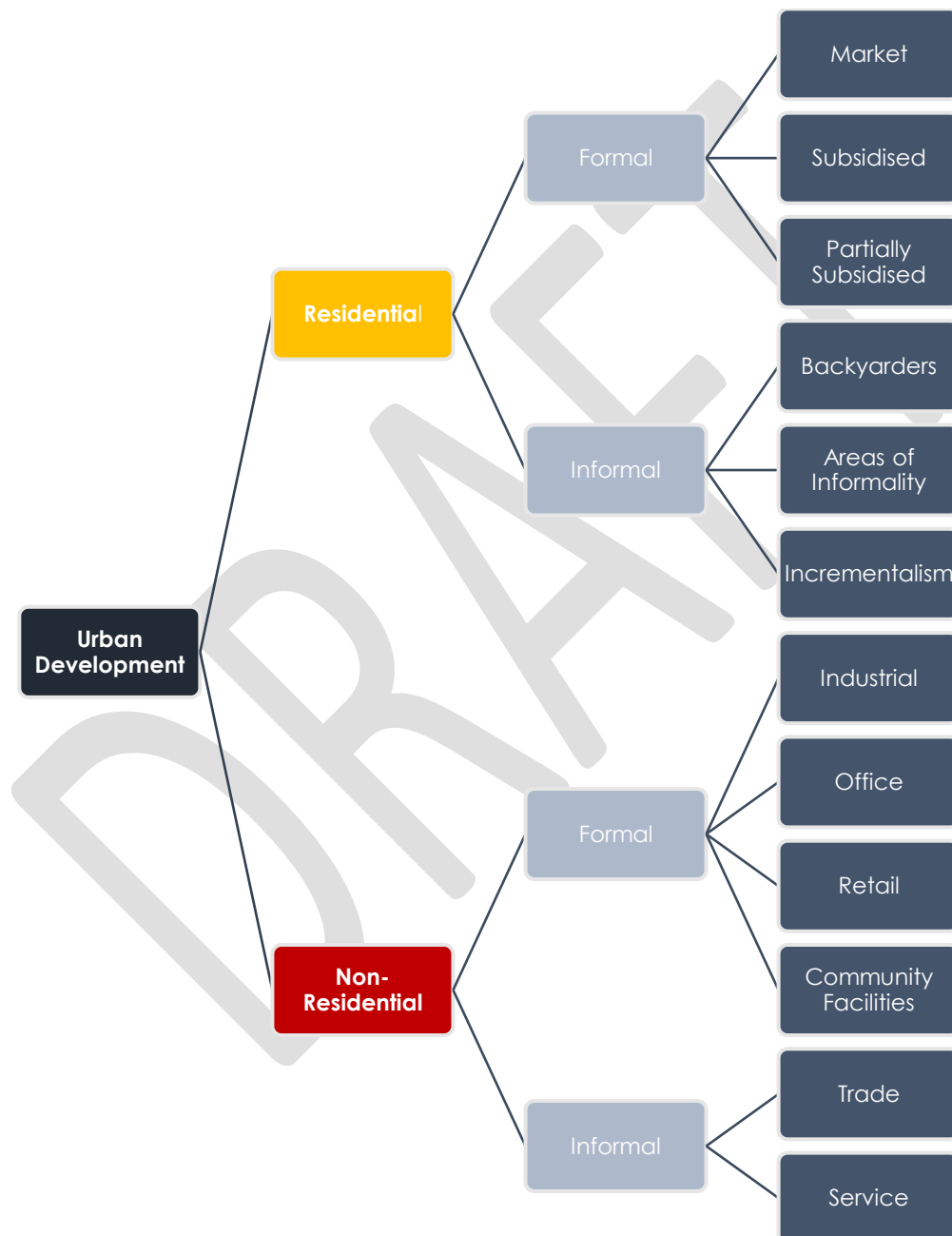


Figure 8: Types of Property Development

12.1.1 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.

12.1.2 Methodology

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

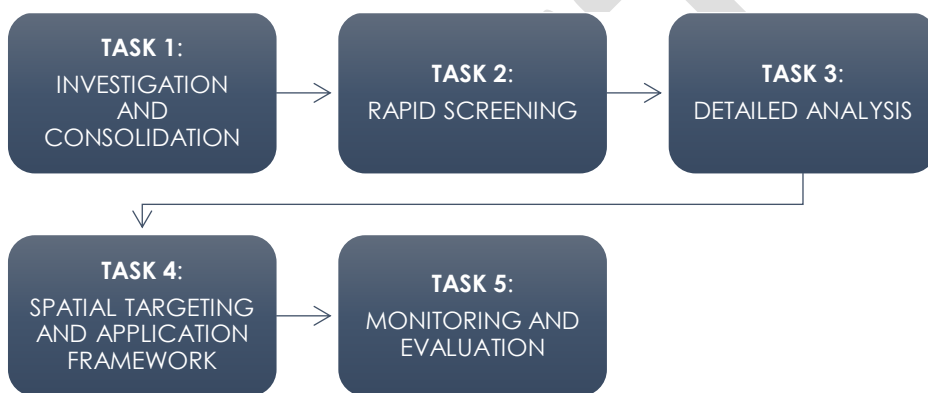


Figure 9: Key Tasks

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 – 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.

12.2. Investigation and Consolidation

CURRENT POLICY

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

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.

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.

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:

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.

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.

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.

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.

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).

KEY FINDINGS

Institutional

Efficient Land Use Application Process - Unified and streamlined land development processes where proposals and applications supportive of TOD (density, intensity, design and location) are fast-tracked and development and investment is valued within the parameters of the City's stated transformation objectives.

Aligned Policy & Sector Plans: Sector Planning is intended to ensure that the City prepares bankable, viable and appropriate capital public investment pipelines to meet the City's future growth, which is aligned to the City 2040 Land Use Model and District Spatial Development Framework.

Special Assessment District - Additional tax paid by property owners within a defined geographic area that is estimated to benefit from a specific public improvement. To obtain upfront capital, municipality typically issues bonds backed by the special assessment district's cash flow. The rate and length of time the assessment is in place can vary – until funding amount is reached.

City Improvement Districts (CIDs) – usually takes the form of the provision of supplementary and complementary services provided by a non-profit organisation operating within a defined geographic area. CIDs are created by local business owners to provide “top-up” cleaning and security services funded by an additional rate (rates) levied on the properties in that defined area. Some CIDs also undertake other urban management functions relating to environment management and social responsibility.

Economic Areas Management Plan (ECAMP) – a data driven decision-making support tool to guide the strategic allocation of City resources across the 71 identified business precincts. The ECAMP Review is currently underway to update and expand on the existing tool.

Special Economic Zones (SEZ) - are geographically designated areas set aside for specific targeted economic activities. These industrial hubs are supported through special incentives and trade laws such as a preferential corporate tax rates, VAT and customs duty suspension in customs-controlled areas, employment incentives, building allowances and preferential land rental and utility rates. Atlantis has been

identified as a Green Tech hub focussing on renewable energy and green technology sector.

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 erven.

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

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.

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.

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.

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.

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 DSDP 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?

Scoring Method:

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

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

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

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

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

Table 15: Scoring Matrix

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

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

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

Three ranges of scoring are used to evaluate the individual scores of each mechanism – see cumulative score guide in Table 15 above. Those receiving a score between 4 to 6 are deemed to have a low implementation potential. Scoring of 7 to 9 are

considered in the mid-range, and those scoring between 10 to 12 have the highest potential of effective implementation.

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)

DRAFT

12.3. Detailed Analysis

The mechanisms and tools as described in **Section 7.3** 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.

DRAFT

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 polices or legislation the 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
---------------------------------	---

DRAFT

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) 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:
 - (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 10 below. Full details can be found in CCT Standard Operational Framework for the Administration of Investment Incentives (2019).

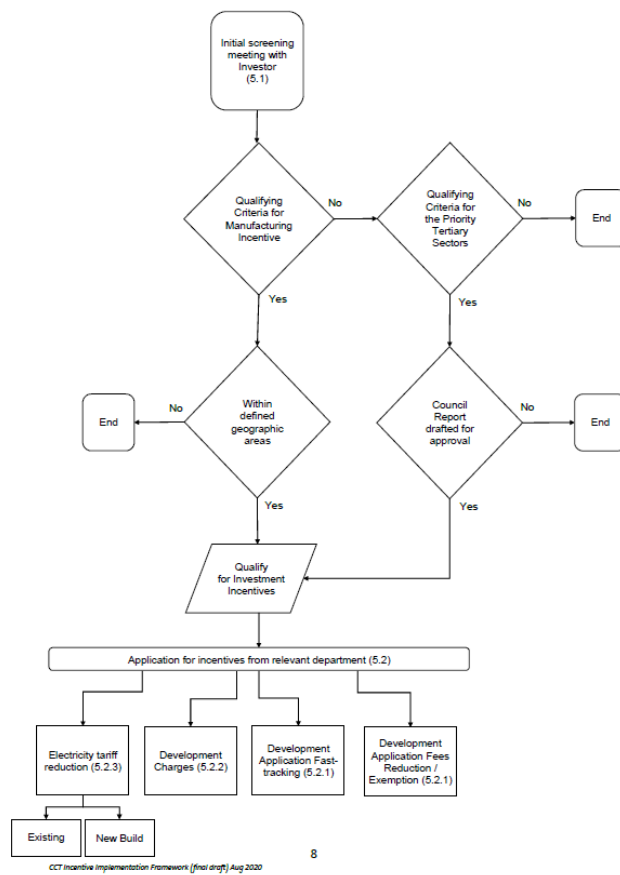


Figure 10: Application Process

g) Advantages and Disadvantages

Advantages	Disadvantages
<ul style="list-style-type: none"> • Help mitigates financial risk to developer and marginally improves overall project feasibility. • Currently regulated within the City's Investment Incentive Policy 	<ul style="list-style-type: none"> • 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.

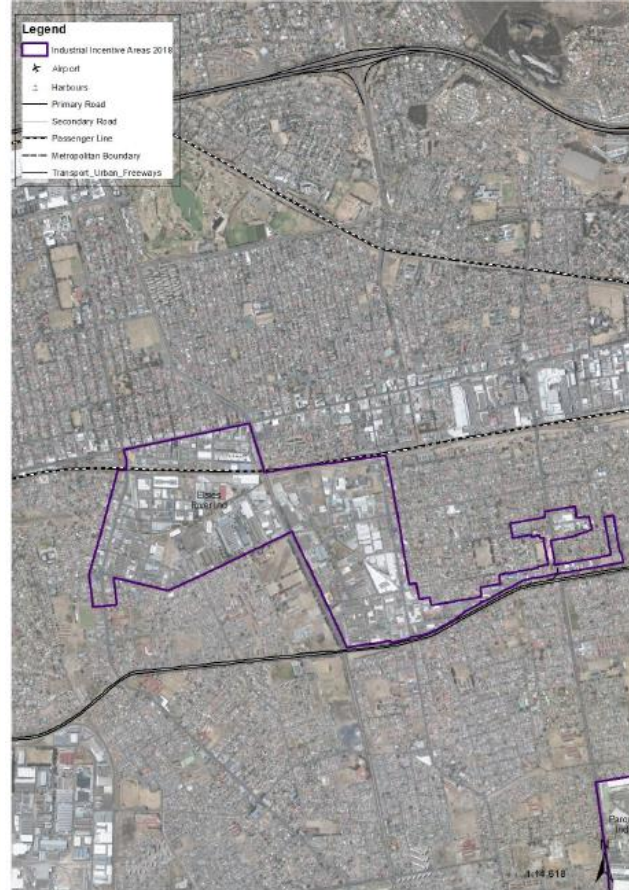
h) Targeted Areas

The following maps defined geographic areas for manufacturing incentives:

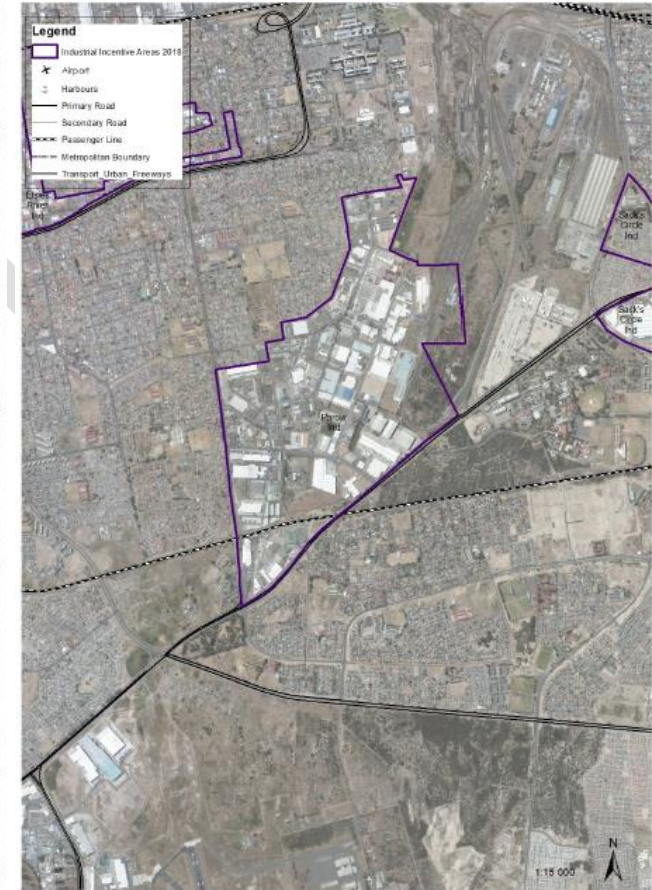
Atlantis Industrial Area



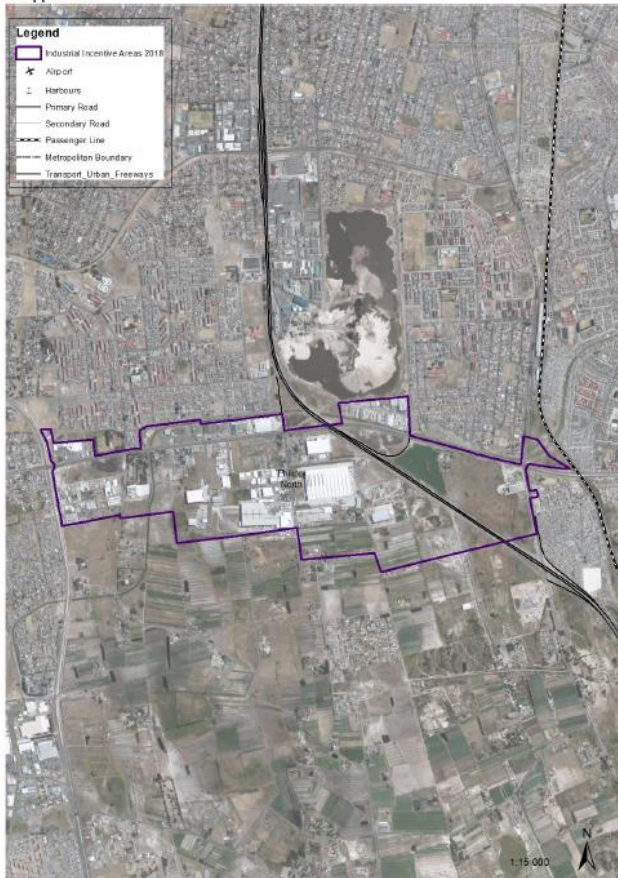
Elsies River



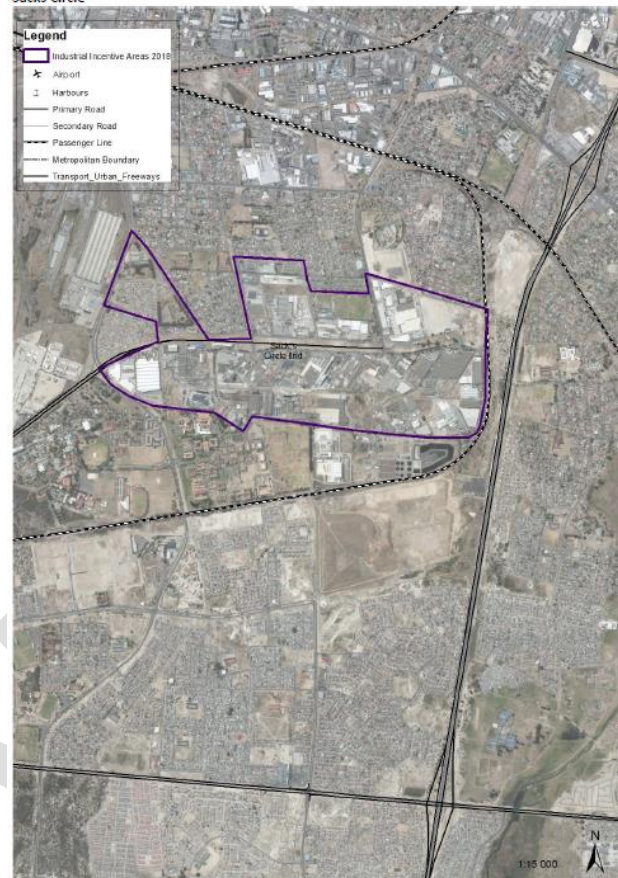
Parow Industria



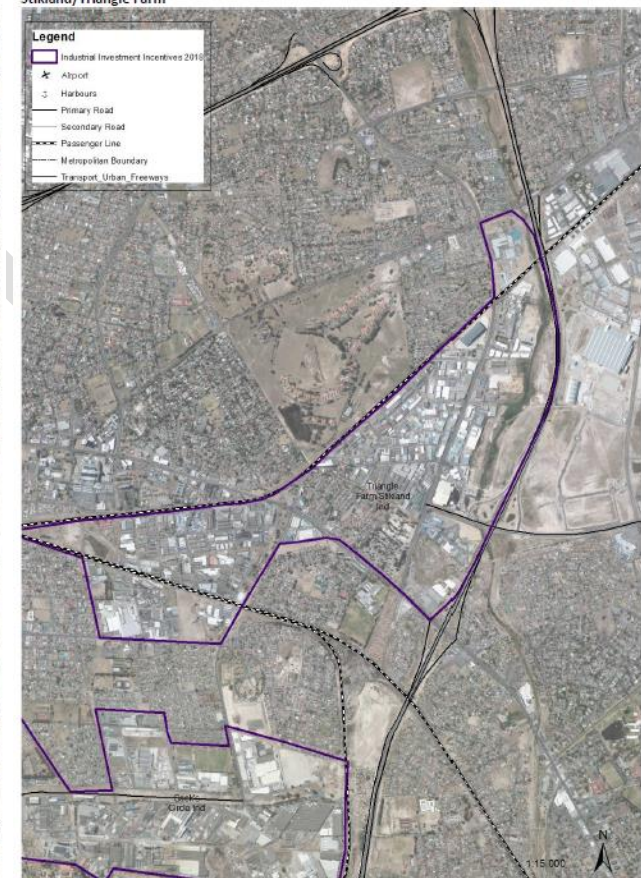
Philippi North



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) 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:
 - (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 4 below. Full details can be found in CCT Standard Operational Framework for the Administration of Investment Incentives (2019).

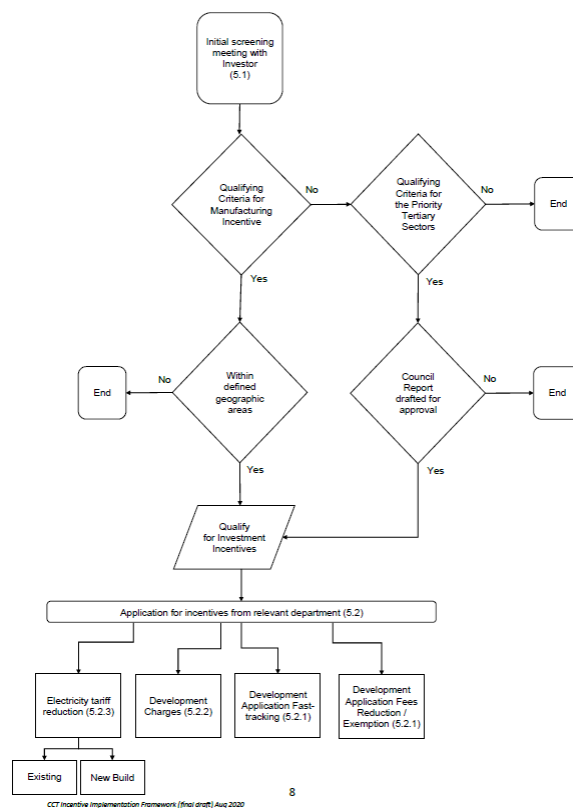


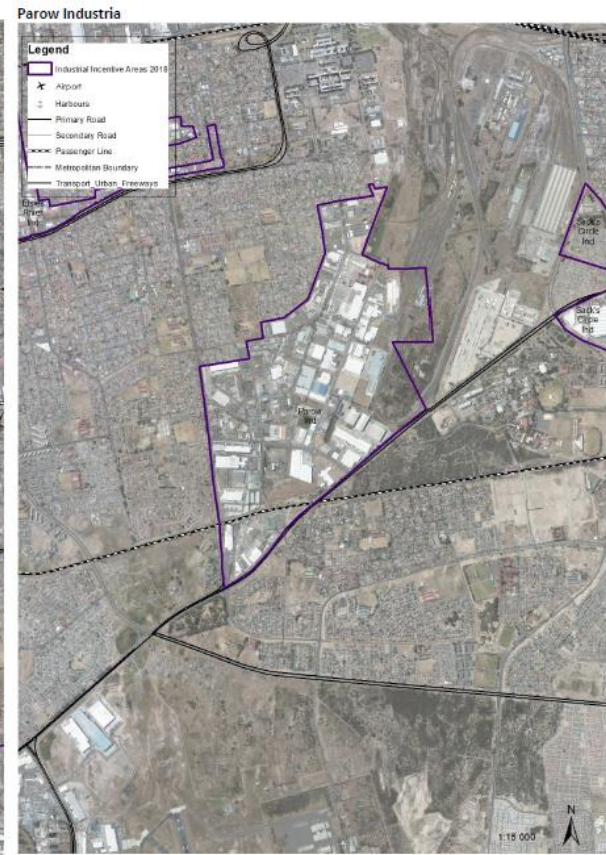
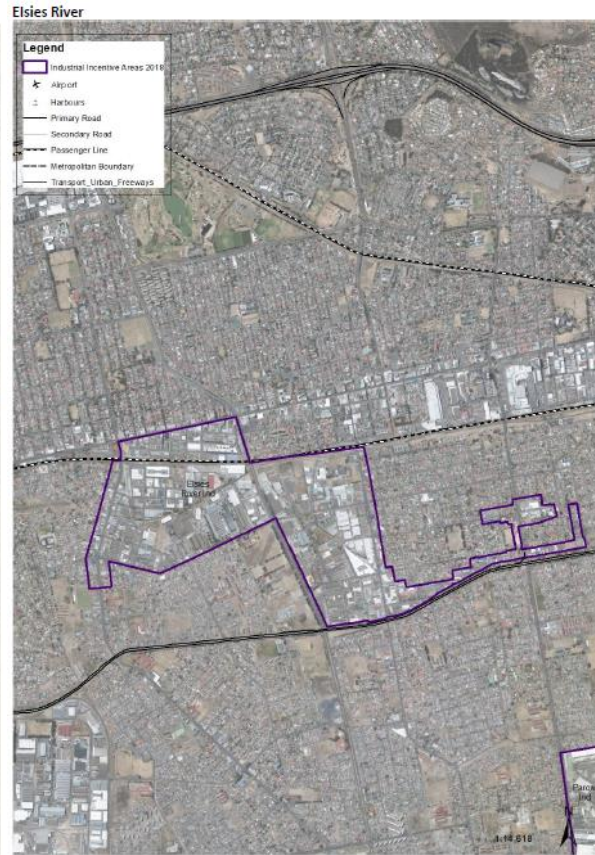
Figure 11 Application Process

g) Advantages and Disadvantages

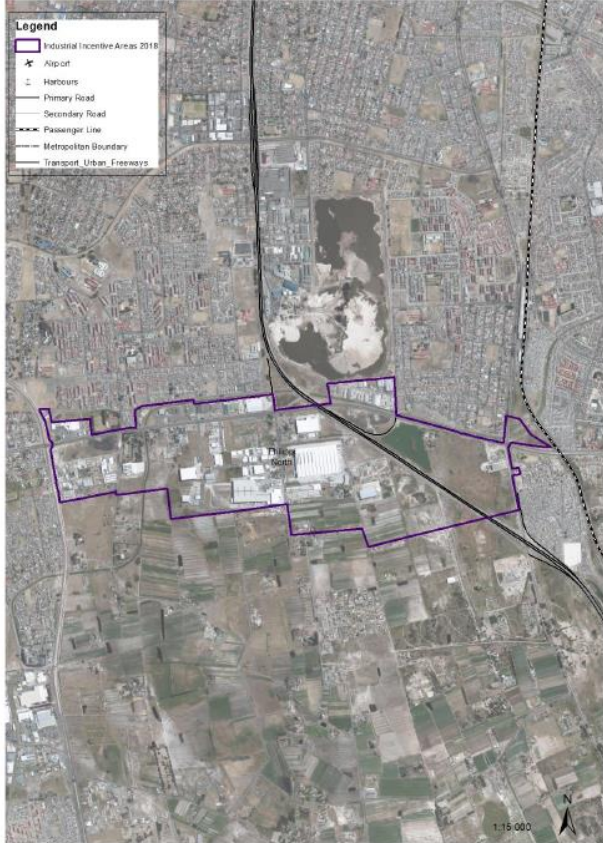
Advantages	Disadvantages
<ul style="list-style-type: none"> • Help mitigates financial risk to developer and marginally improves overall project feasibility. Compared to all local municipalities building plan fees are above average, but more than double compared to Johannesburg, Pretoria or Durban (commercial office is +- x3 more expensive) (ECAMP, 2013). • Currently regulated within the City's Investment Incentive Policy 	<ul style="list-style-type: none"> • 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.

DRAFT

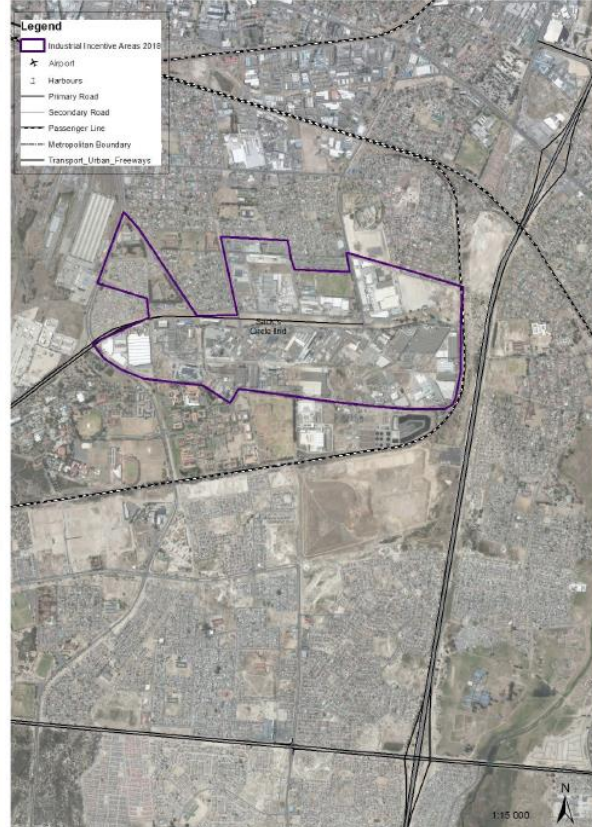
h) Targeted Areas- the following maps defined geographic areas for manufacturing incentives:



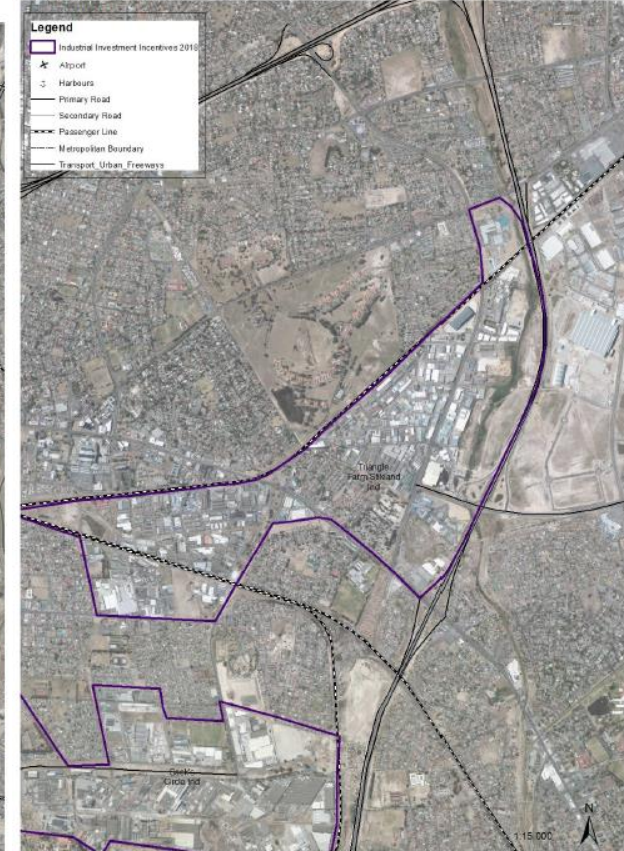
Philippi North



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.
- (5)

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 105 below. Full details can be found in CCT Standard Operational Framework for the Administration of Investment Incentives (2019).

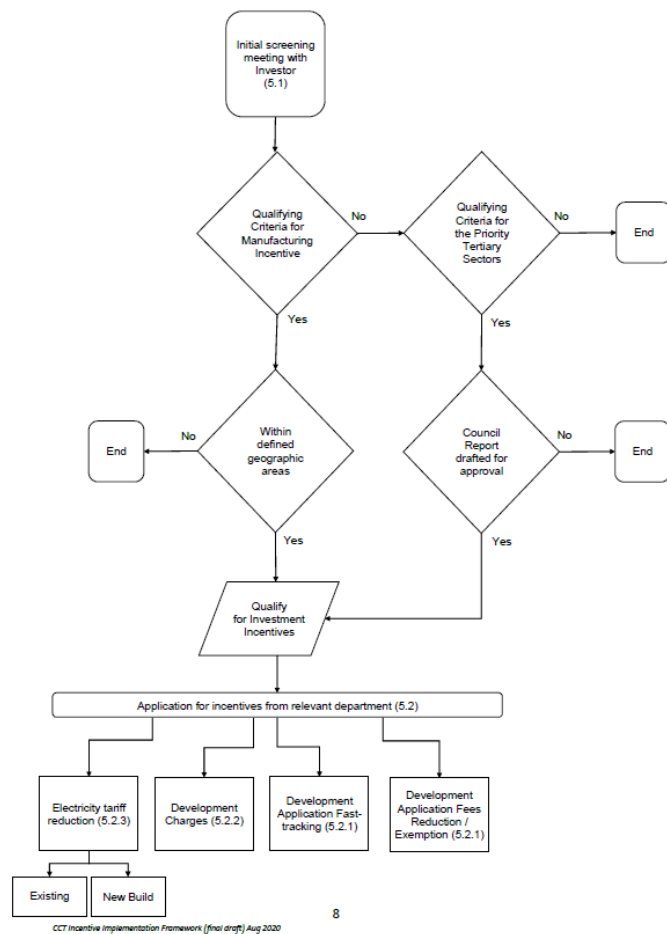


Figure 12: Application Process

g) Advantages and Disadvantages

Advantages	Disadvantages
<ul style="list-style-type: none">• Helps reduce operational cost to the property owner.• Currently regulated within the City's Investment Incentive Policy	<ul style="list-style-type: none">• At the moment this incentive is only applicable to two economic sectors and only six geographic areas in Cape Town. However, this is done to mitigate severe financial risk to the City.

h) Targeted Areas

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

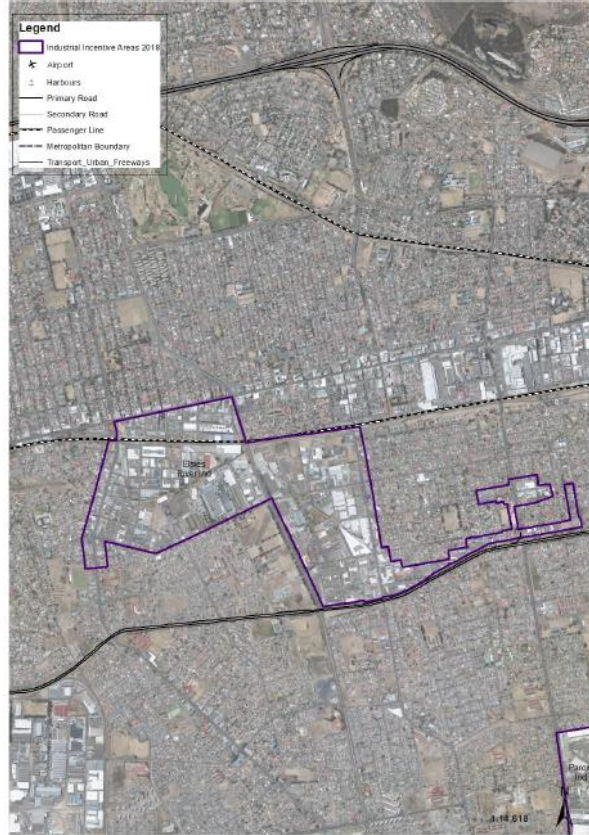
The following tertiary sectors have been identified of this incentive:

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

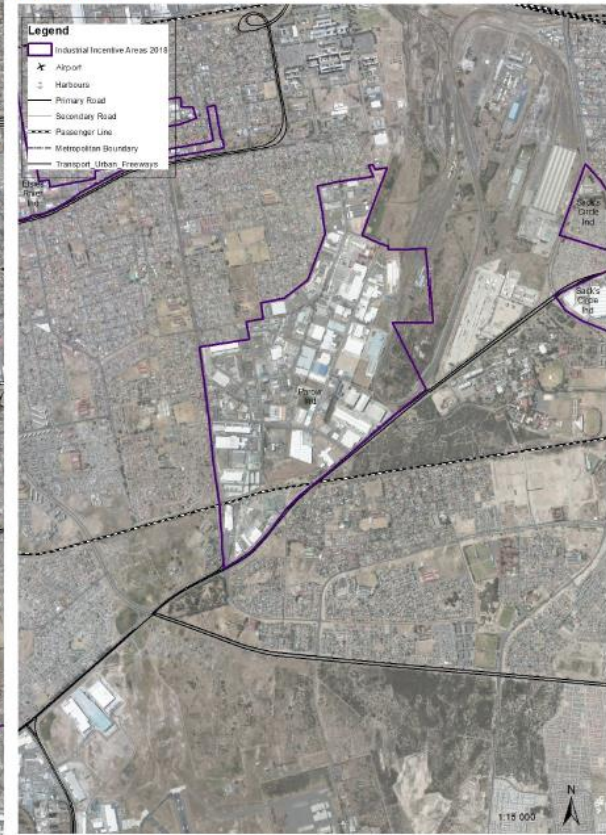
Atlantis Industrial Area



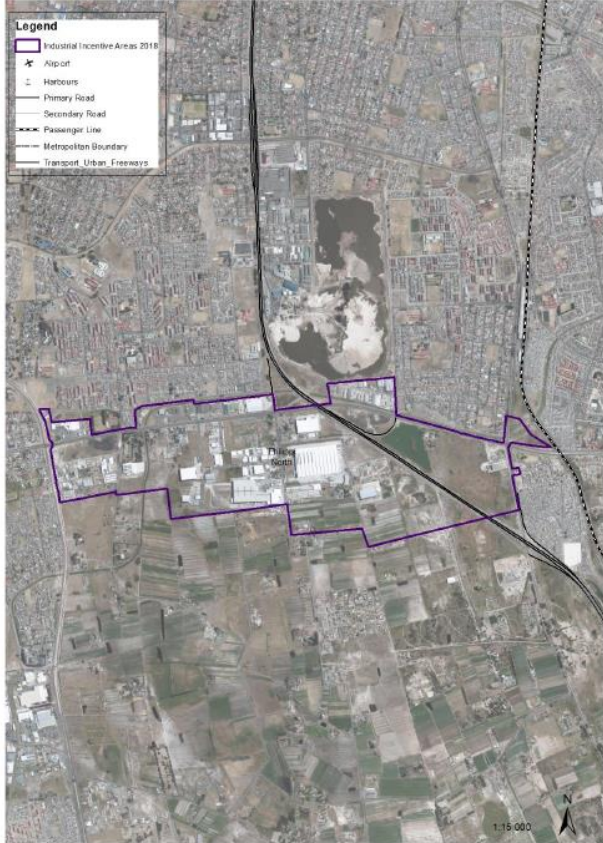
Elsies River



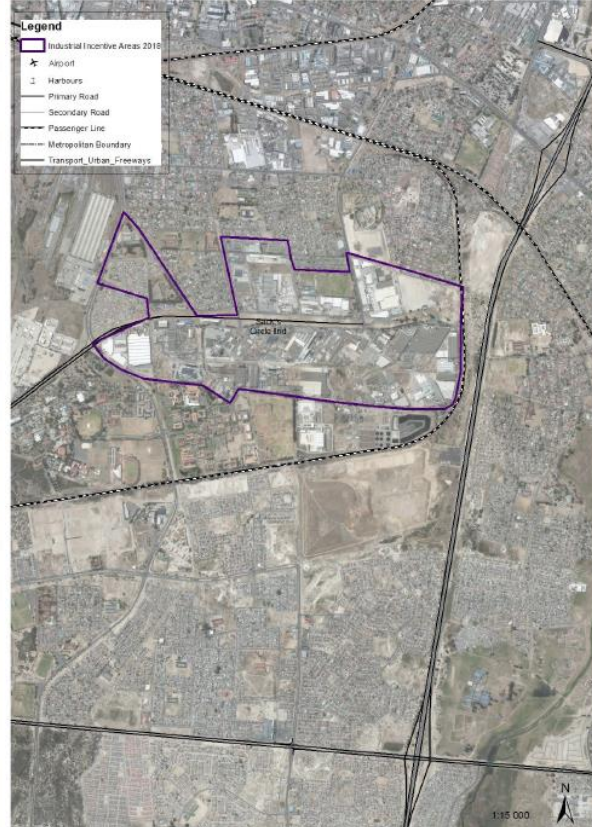
Parow Industria



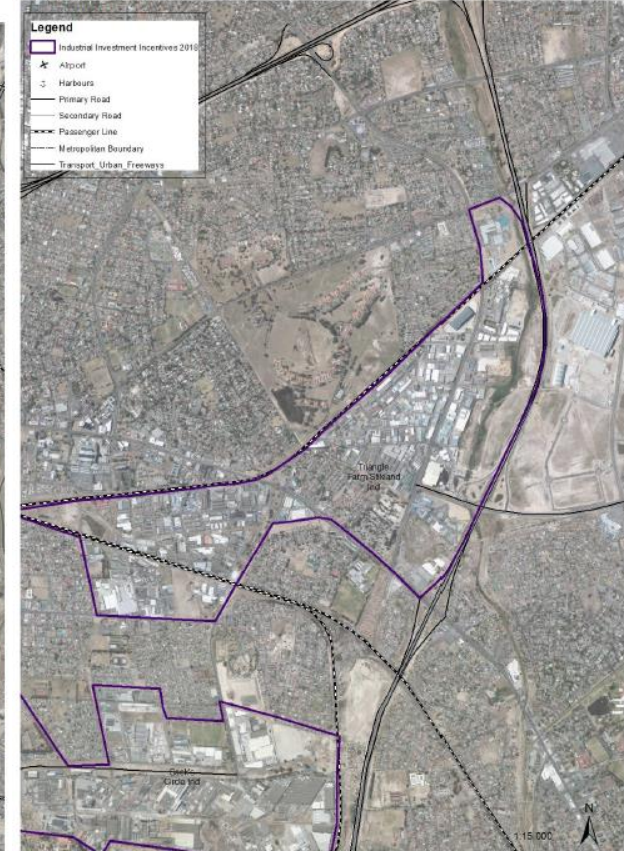
Philippi North



Sacks Circle



Stikland/Triangle Farm



PT Zones

Focus Area:

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

Project Type:

- Areas around Transit Accessible Precincts
- New developments

Goal:

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

a) How it works:

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

Minimum criteria for the demarcation of PT1 and PT2 areas

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

Figure 13 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: <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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 14 Additional criteria for PT1 and PT2 areas

b) Qualifying Criteria

c) 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.

d) 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 (**Figure 6** and **Figure 7**).
- ii) It is only applicable in the areas as delineated on the PT areas map.

e) 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.

f) 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.

g) Advantages and Disadvantages

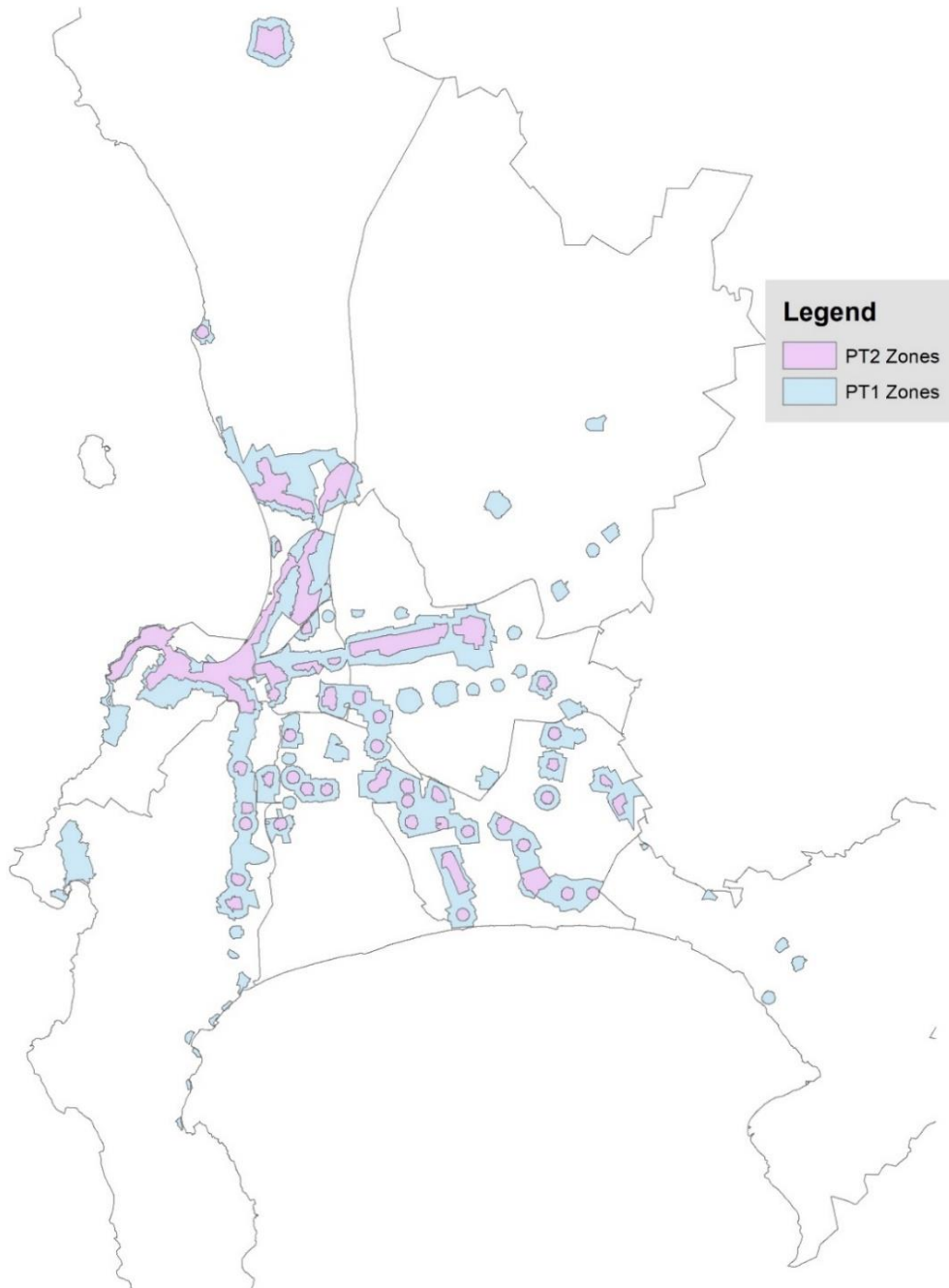
Advantages	Disadvantages
<ul style="list-style-type: none">• Already approved and implemented.• Encourages dense forms of development• Promotes the City's public transport networks• Encourages a move away from single car ridership• Ecological and environmental benefits• Uses public infrastructure more efficiently• Can enable marginally viable developments to become viable	<ul style="list-style-type: none">• 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

h) Lessons Learnt

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

i) Targeted Areas

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



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.

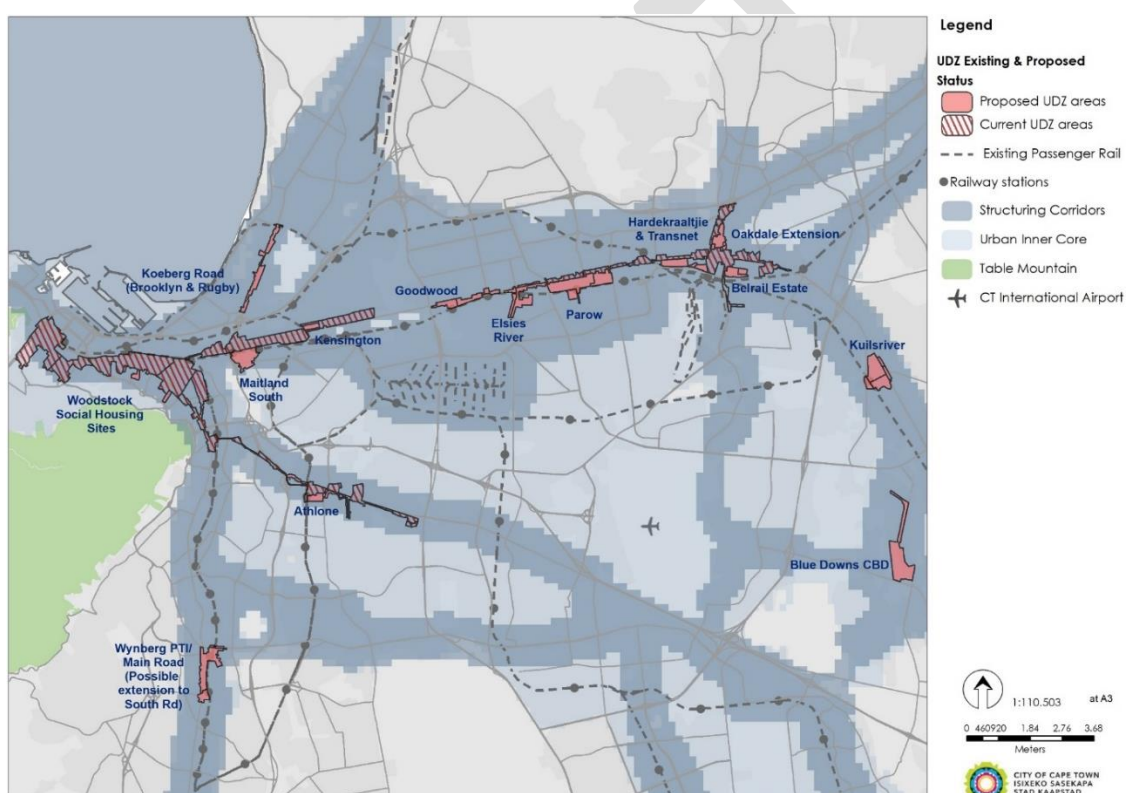


Figure 15: Existing and Proposed UDZ Areas within the City of Cape Town

b) Qualifying Criteria

c) 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.

d) 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.

e) 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.

f) 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.

g) Advantages and Disadvantages

Advantages	Disadvantages
<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• 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

h) 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.

i) Targeted Areas

Existing delineation – see Figure 8

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
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 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.

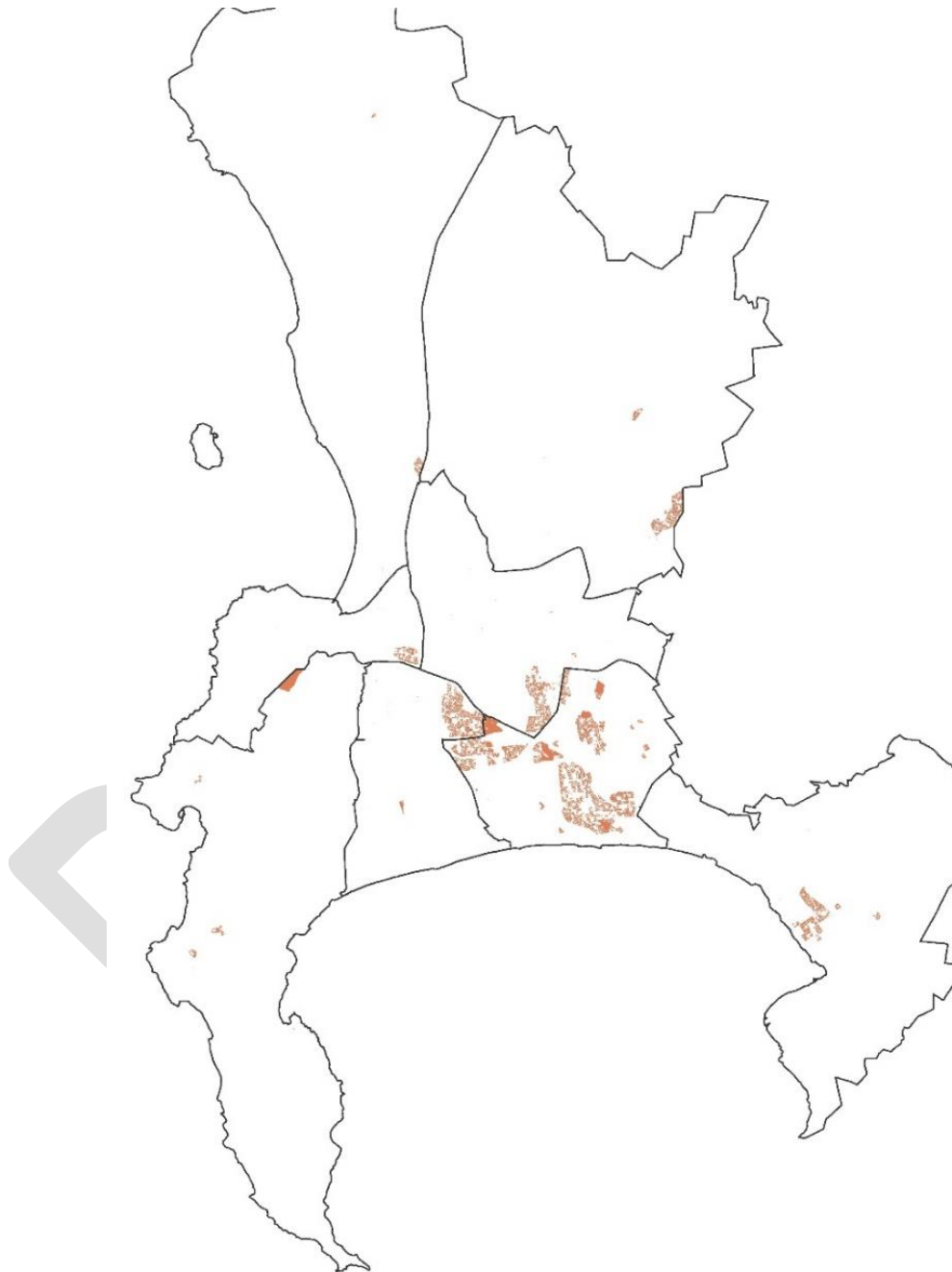
f) Lessons Learnt

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



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
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 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 Pipeline Areas
- iii) TOD Hubs

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 1 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 15 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.

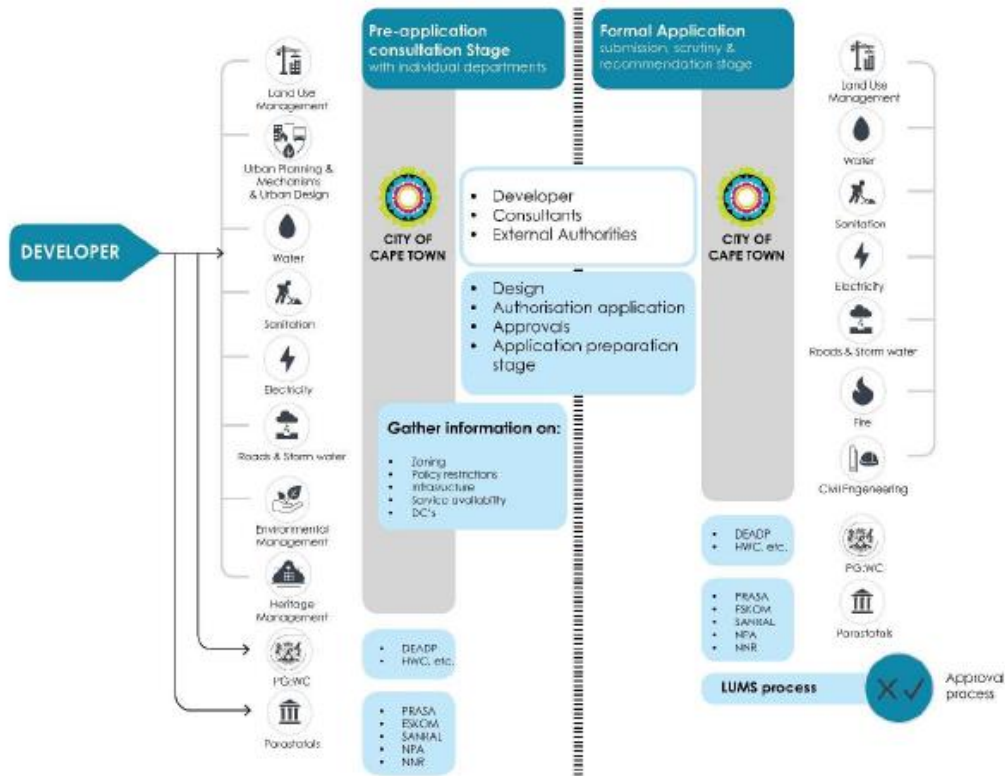


Figure 16 Depiction of a typical development application process

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 17 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	<p>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 to <u>finalise a design directive</u> for the proposal. This process is likely to be iterative until the design directive is clear.</p> <p>See below for the THREE STEP TECHNICAL CONSULTATIVE PROCESS.</p> <p>General Practice</p> <p>The case officer is the lead, setting up all three sessions and follow-up sessions until there is clarity on a design directive.</p> <ul style="list-style-type: none"> - 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. 	<p>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.</p> <p>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.</p> <p><u>(Specific specialist guidance to be provided by the Urban Design Branch.)</u></p> <p>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:</p> <ul style="list-style-type: none"> • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport 	<p>Standard operating procedures.</p> <p>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.</p>	<p>Standard operating procedures are followed for applications that do not result in the substantial intensification in land use rights.</p> <p>Prior to submission of application for <u>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:</p> <ul style="list-style-type: none"> • 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 	<p>Standard operating procedures.</p>
<p>The THREE STEP TECHNICAL CONSULTATIVE PROCESS led by the DM Case Officer is as follows:</p> <p>Step 1: Yield and Type</p> <p>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)</p> <p>Negotiations on inclusionary housing should also be initiated and finalised in principle if applicable.</p> <p>Step 2: Urban design, environment and heritage</p> <p>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</p> <p>Step 3: Transport operations and infrastructure</p> <p>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:</p> <ul style="list-style-type: none"> • Access arrangements, Parking provision, Road schemes and width, NMT, Traffic circulation, Public transport <p>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.</p>					

APPLICATION TYPE	"Urban Inner Core" with access to <u>existing scheduled public transport service</u> 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	<p>The main consideration in such an application is to achieve the "ideal block size" spectrum as advised by Urban Design Branch.</p> <p>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:</p> <ul style="list-style-type: none"> • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport 	<p>The main consideration in such an application is to achieve the "ideal block size" spectrum as advised by Urban Design Branch.</p> <p>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:</p> <ul style="list-style-type: none"> • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport 	<p>Standard operating procedures.</p> <p>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.</p>	<p>Standard operating procedures.</p>	<p>Standard operating procedures.</p>
Consolidation of land	<p>The main consideration in such an application is to achieve the "ideal block size" spectrum as advised by Urban Design Branch.</p> <p>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:</p> <ul style="list-style-type: none"> • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport 	<p>The main consideration in such an application is to achieve the "ideal" block size spectrum as advised by Urban Design Branch.</p> <p>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:</p> <ul style="list-style-type: none"> • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport 	<p>Standard operating procedures.</p> <p>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.</p>	<p>Standard operating procedures.</p>	<p>Standard operating procedures.</p>

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	<p>Specific attention should be given to the following departure types:</p> <ul style="list-style-type: none"> • Parking • Floor area • Height • Access requirements • Building line <p>Departures granted should achieve the TODC yield and urban design guidelines, transport objectives and standards.</p> <p>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:</p> <ul style="list-style-type: none"> • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport 	<p>Specific attention should be given to the following departure types:</p> <ul style="list-style-type: none"> • Parking • Floor area • Height • Access requirements • Building line <p>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></p> <p>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:</p> <ul style="list-style-type: none"> • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport 	<p>Standard operating procedures.</p> <p>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.</p>	<p>Standard operating procedures.</p>	<p>Standard operating procedures.</p>
Consent, approval or any other permission or requirement in terms of the development management scheme	<p>Consent granted should achieve the TODC yield and urban design guidelines, transport objectives and standards.</p> <p>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:</p> <ul style="list-style-type: none"> • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport 	<p>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></p> <p>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:</p> <ul style="list-style-type: none"> • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport 	<p>Standard operating procedures.</p> <p>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.</p>	<p>Standard operating procedures.</p>	<p>Standard operating procedures.</p>

Figure 18 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) Elsie's 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 1 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

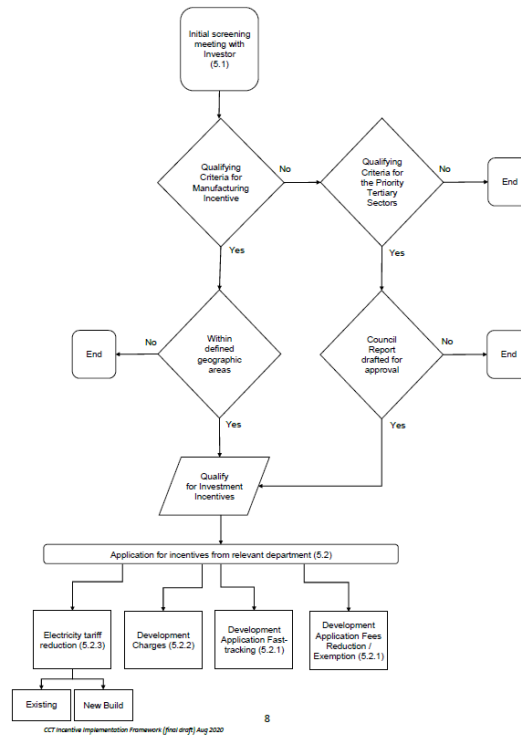


Figure 19 Application Process

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 (5.2) that makes the pre-application consultation mandatory.

g) Advantages and Disadvantages

Advantages	Disadvantages
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 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.

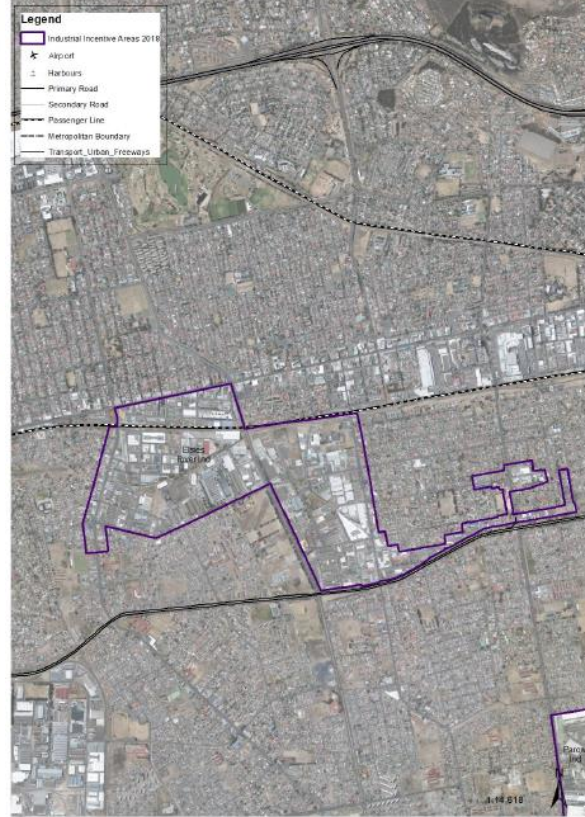
h) Targeted Areas

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:

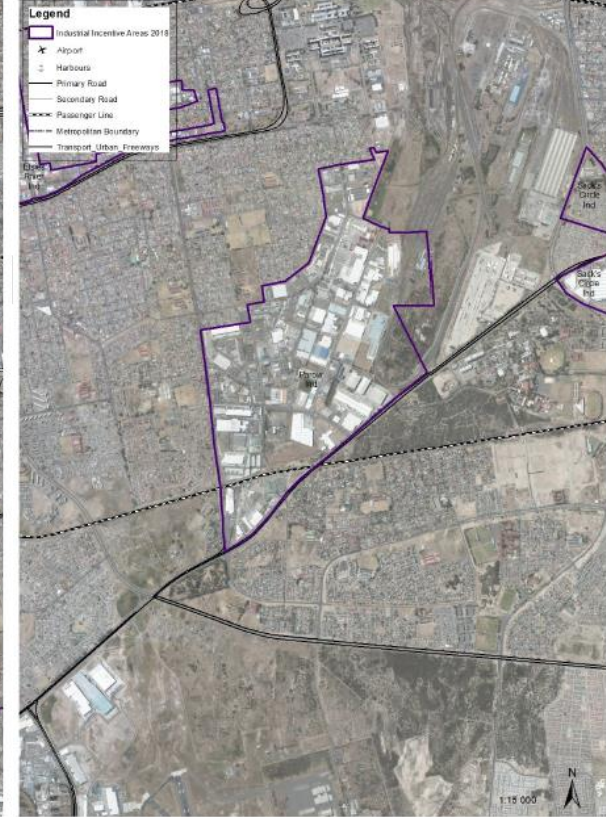
Atlantis Industrial Area



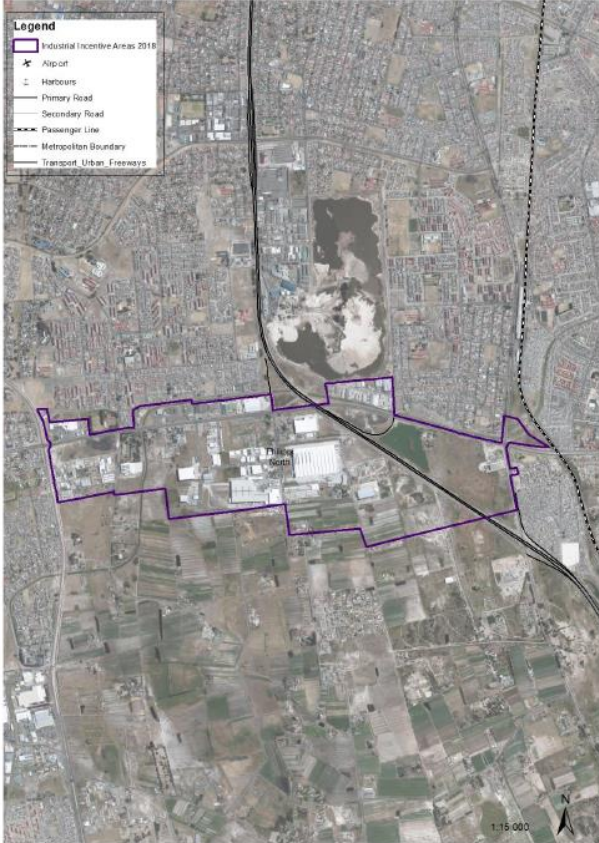
Elsies River



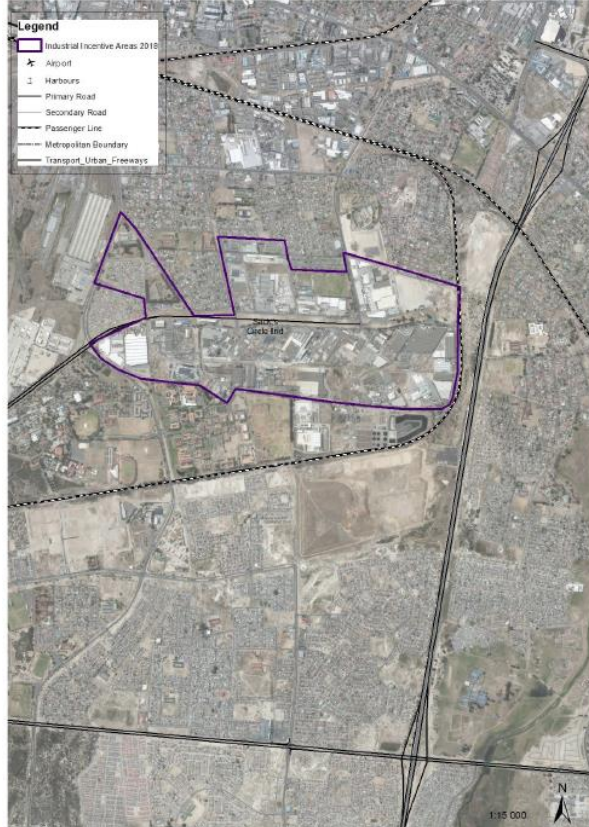
Parow Industria



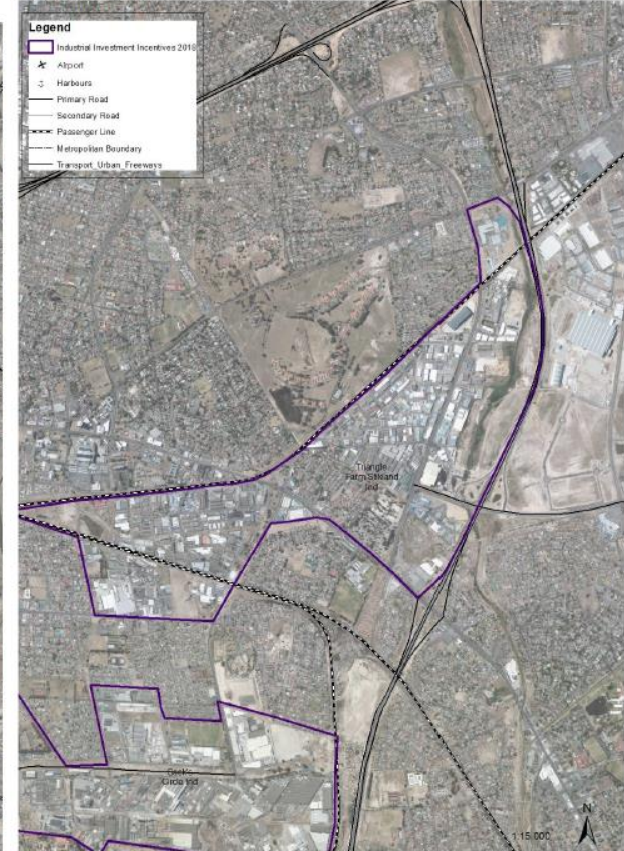
Philippi North



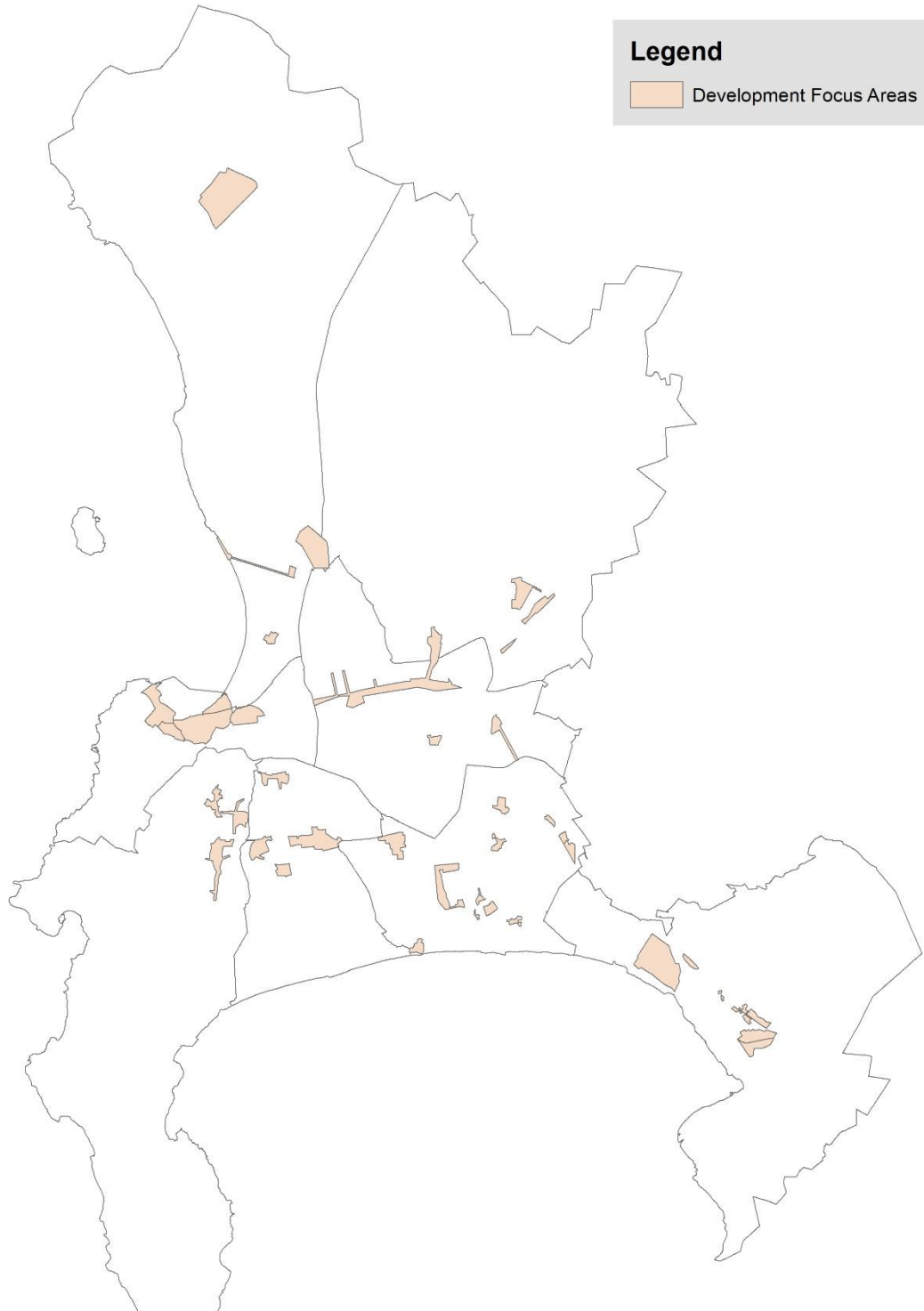
Sacks Circle



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.

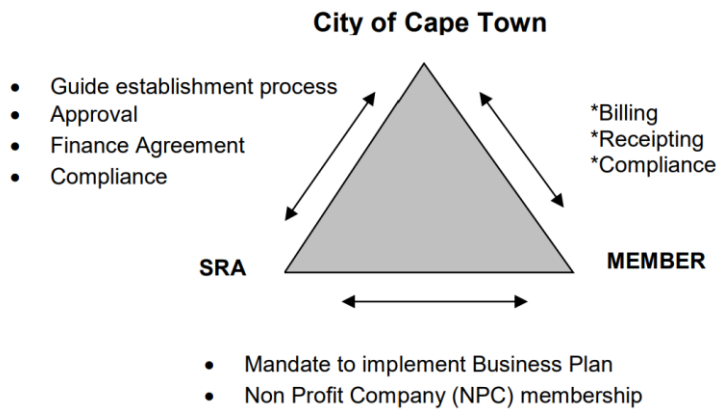


Figure 20 Overview of the relationship between the City, SRA and the member.

b) Costs or Risks

- i) Only minor administrative costs to the municipality.
- ii) Potential risks associated with regeneration of areas.
- iii) Requires a rates base that can support the SRA. (i.e. not applicable in all areas)
- iv) Lack of local capacity / resources may undermine co-funding model.
- v) CIDs only effective where requisite human and financial resources exist within a precinct. May not be appropriate or feasible for smaller, more marginal precincts.
- vi) 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

- i) 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.

ii) 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
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 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) Vredeklouf Community Improvement District
- n) Woodstock CID
- o) Wynberg CID
- p) Zeekoevlei Peninsula SRA

DRAFT

Public Sector Investment Mechanisms

Catalytic Land Development Pipeline

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
 - Paardevlei and Athlone Power Station sites (Special Sites)

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

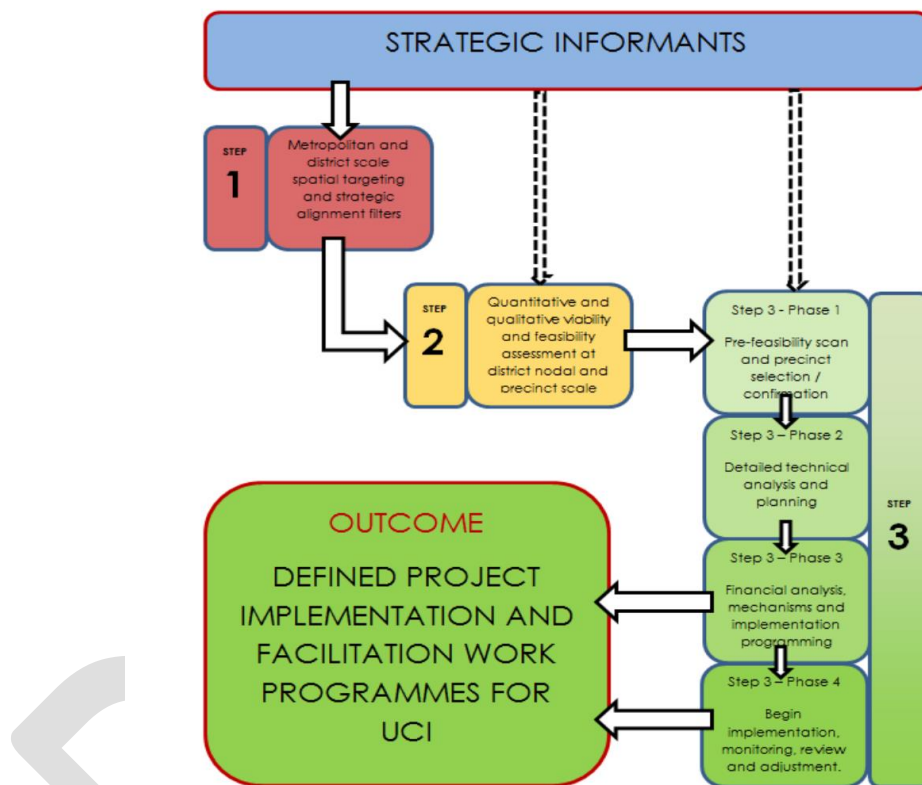


Figure 21: Overview of the CLDP Methodology

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
<ul style="list-style-type: none">• 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.	<ul style="list-style-type: none">• 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/DSDFs. 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
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 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

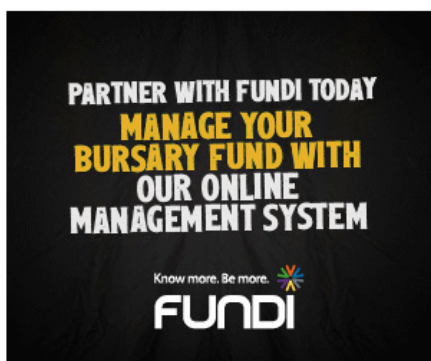
City land lying unused three years after R400m purchase

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."



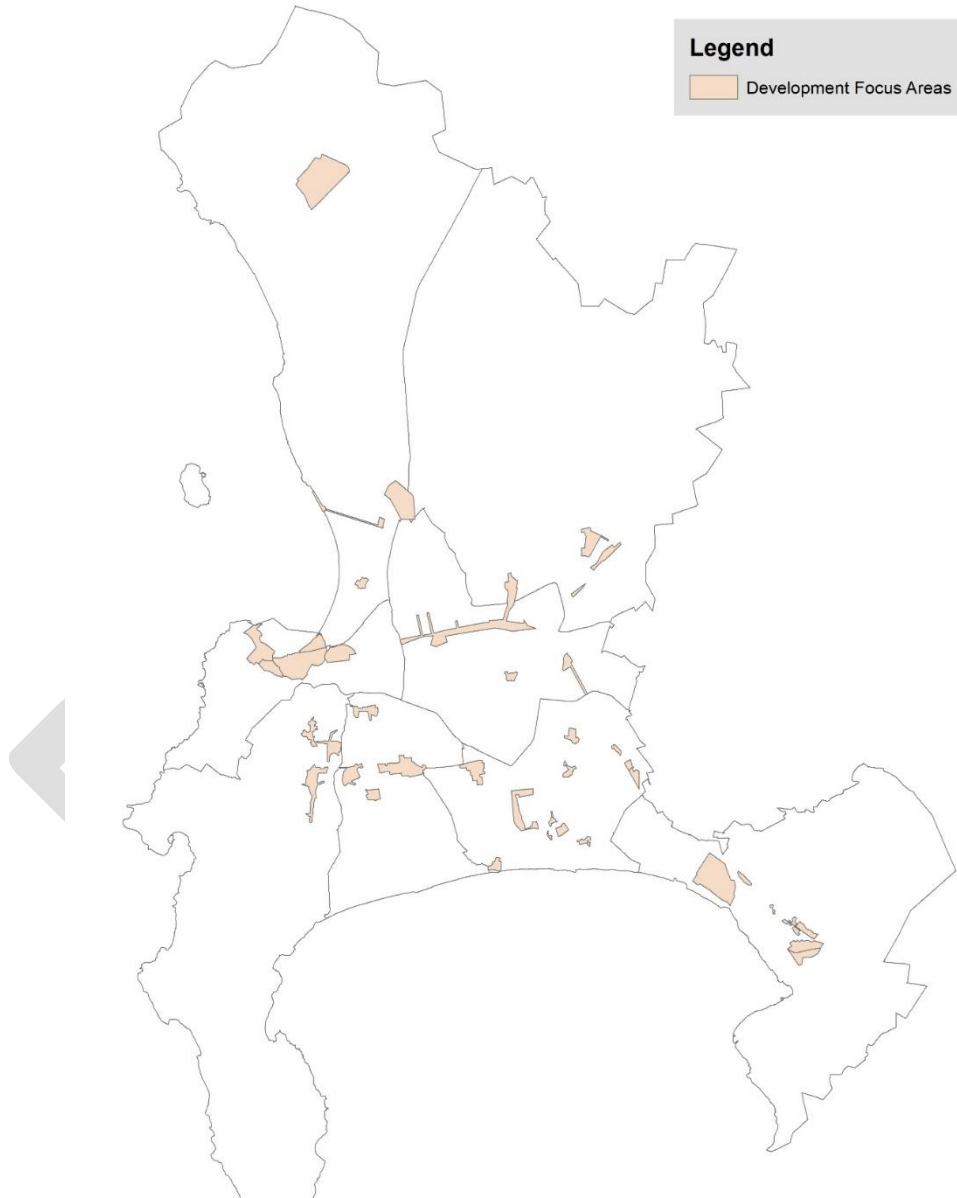
Leppan said the area was struggling with massive infrastructure problem in that there was a shortage of houses and schools.

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
<ul style="list-style-type: none"> • 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.) 	<ul style="list-style-type: none"> • 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.

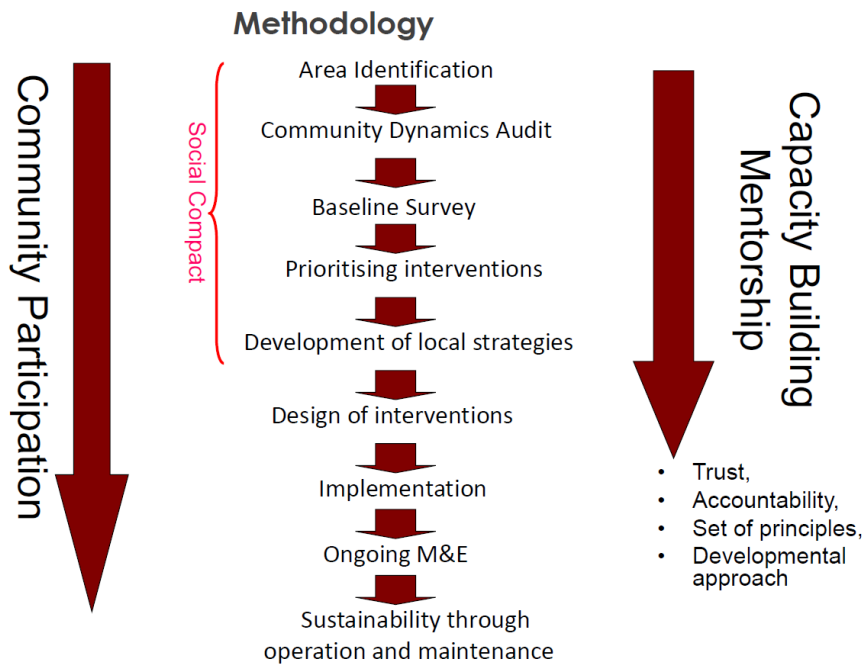


Figure 22: Method

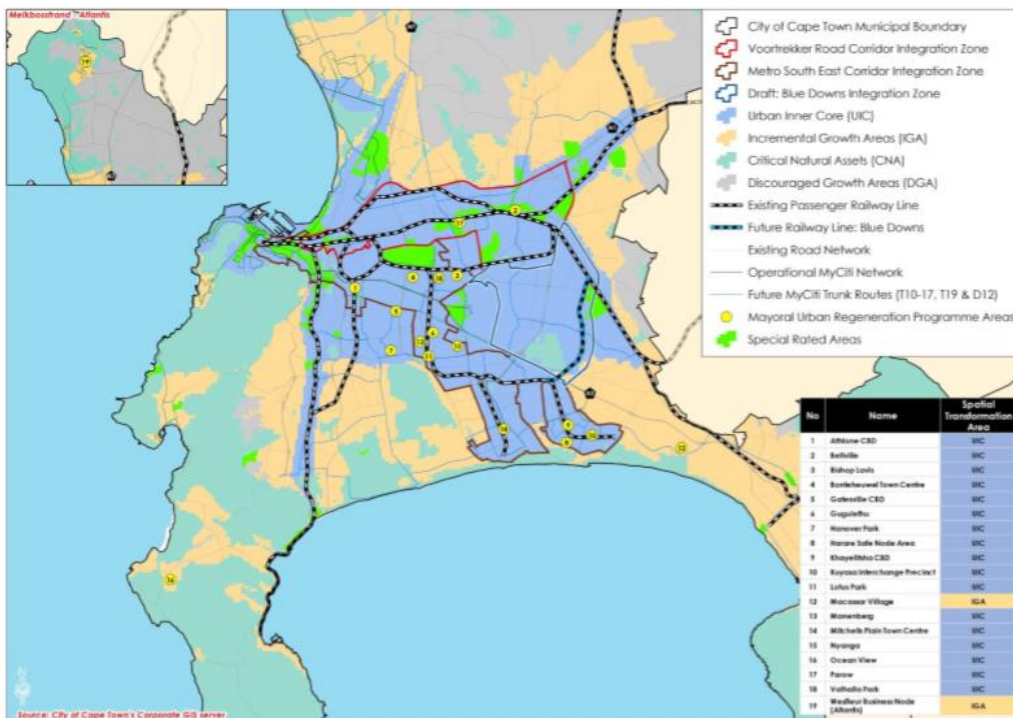


Figure 23: MURP Areas

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
<ul style="list-style-type: none">• 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.	<ul style="list-style-type: none">• 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.

DRAFT

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 with in 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

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.

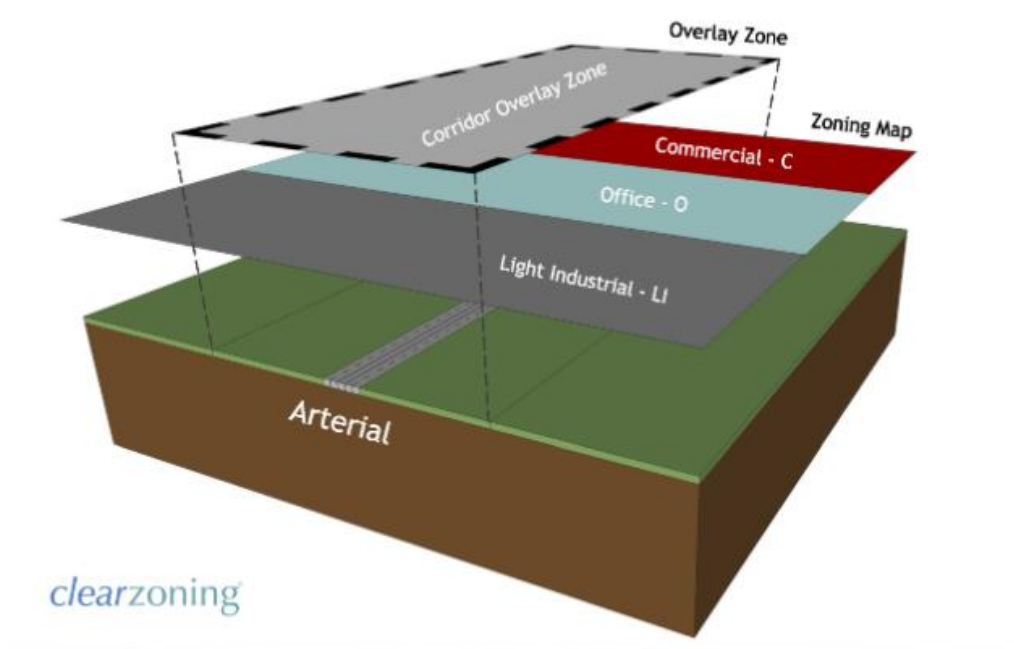


Figure 24 Applying an Overlay Zone

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
<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • 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

DRAFT

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
<ul style="list-style-type: none">• 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.	<ul style="list-style-type: none">• 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

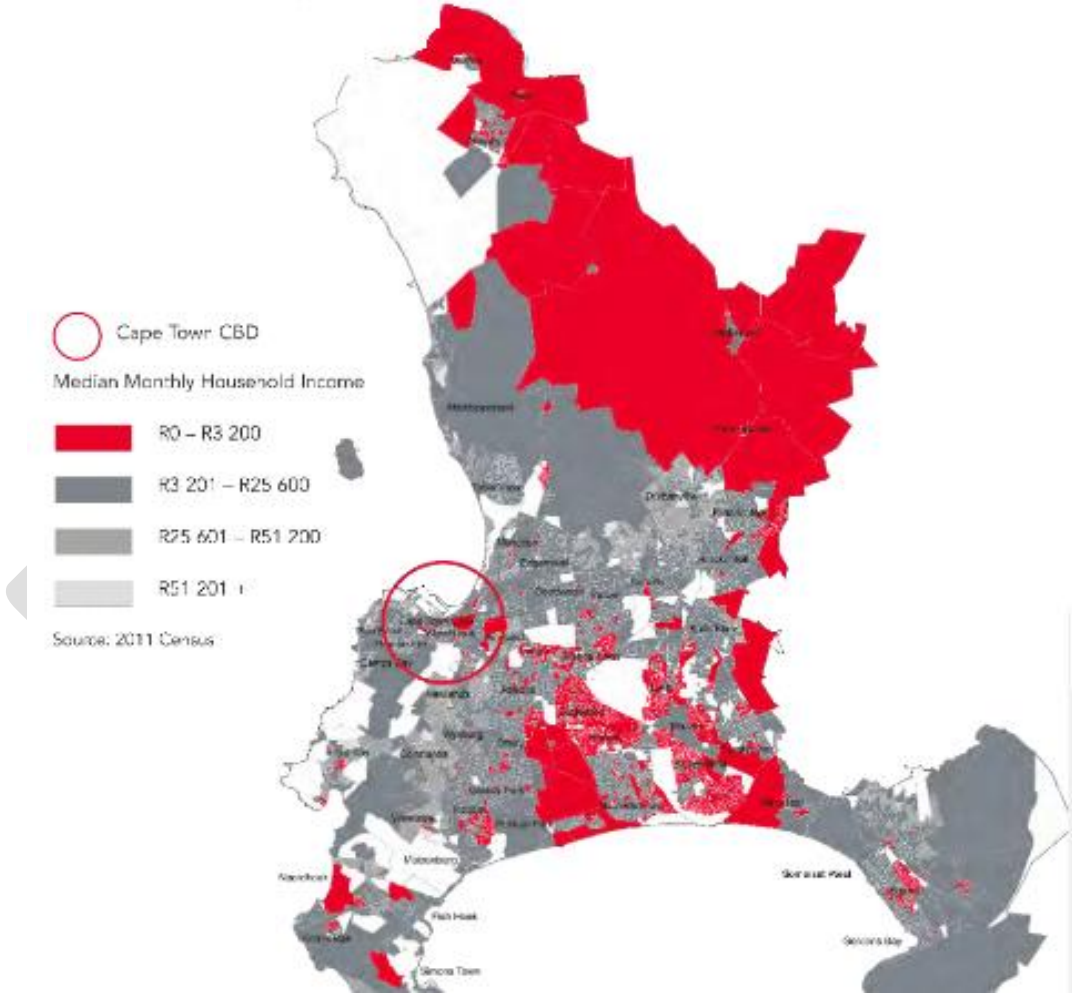
Advantages	Disadvantages
<ul style="list-style-type: none"> • Does not require capital investment by the City. • Is a step towards addressing housing backlog • Enables spatial justice in land use decision-making • Increases supply in affordable housing • Inclusionary housing can contribute towards the City's density objectives 	<ul style="list-style-type: none"> • 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.

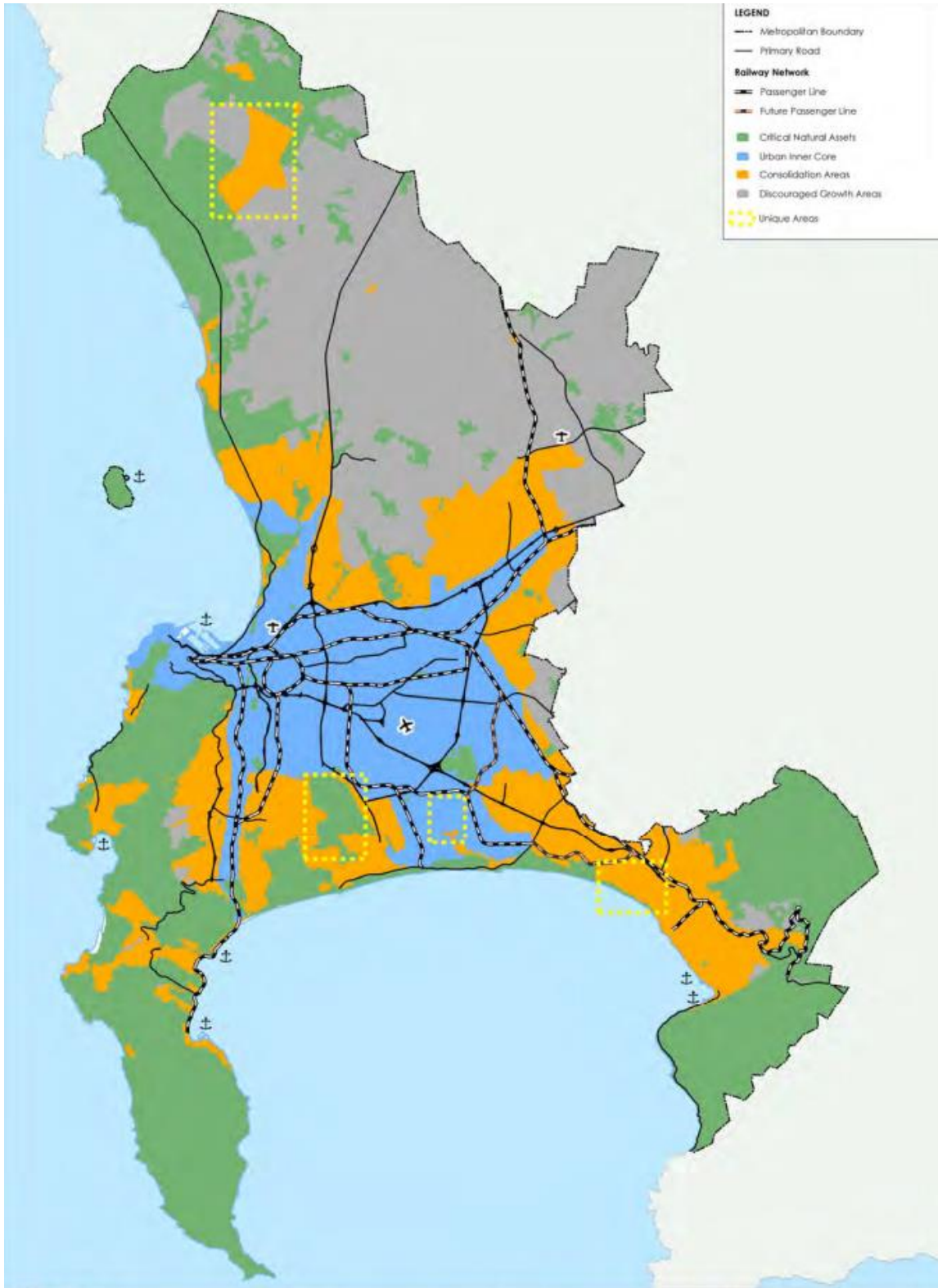
	<ul style="list-style-type: none"> • Uncertainty allocation of units and the portion of housing units allocated to the affordable income group. • Policy uncertainty / red tape driving away investment.
--	--

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

(ii) Application

f) Advantages and Disadvantages

Advantages	Disadvantages
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 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)¹⁵ that has been developed for the exclusion area. 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 EMPr 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.

¹⁵ 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 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.

- 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.

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
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 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

<p>repaired / rehabilitated to return to natural state.</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p> <ul style="list-style-type: none"> • 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.

DRAFT

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
<ul style="list-style-type: none"> • 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 	<p>The application process to HWC is very time consuming</p>

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) Approval and Application process (where relevant)

- (i) Approval
- (ii) Application

e) Advantages and Disadvantages

Advantages	Disadvantages
<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • 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.

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.

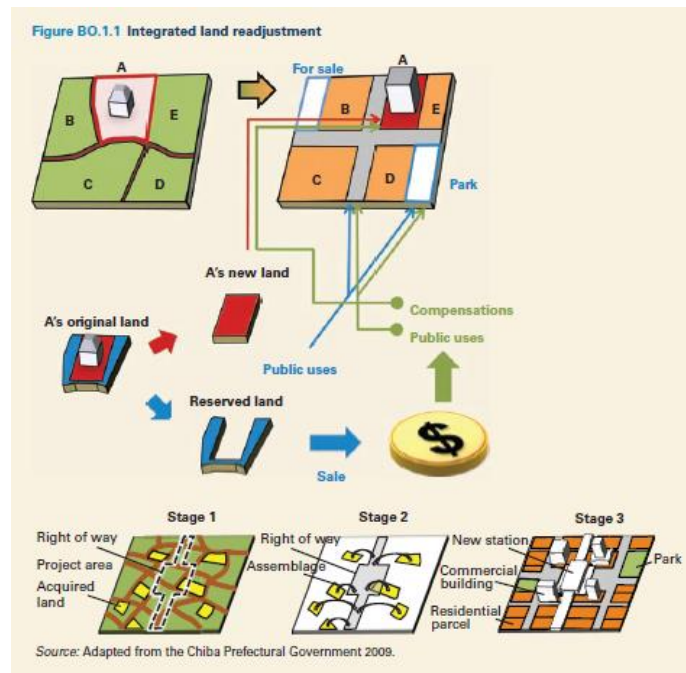


Figure 25: Land Readjustment Scheme (Worldbank, 2015)

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

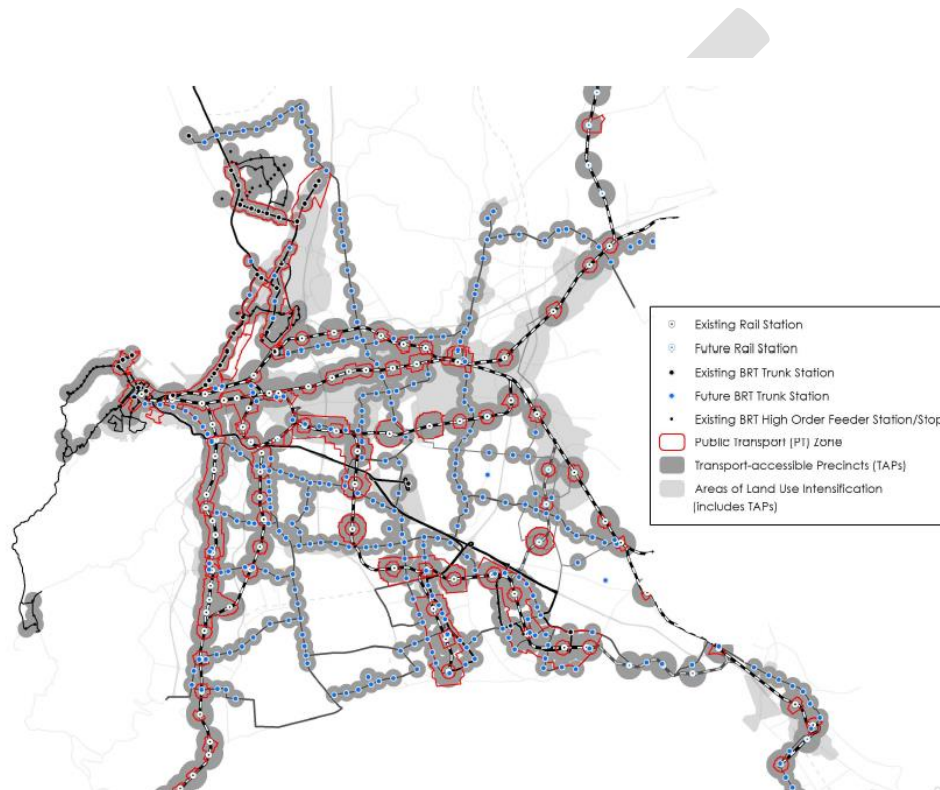
Advantages	Disadvantages
<ul style="list-style-type: none"> • Requires minimal public funds to acquire land compulsory for public purposes. • In a carefully planned land readjustment project, local infrastructure investments could, in theory, be self-financing. • Land readjustments promote transit oriented development and potentially increased density and mix of uses to create sustainable development. • The 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 	<ul style="list-style-type: none"> • 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 operating deficits for the infrastructure improvements.

redevelopment, thus enabling them to enjoy the financial gains generated by the project.

- 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 2 below.



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.

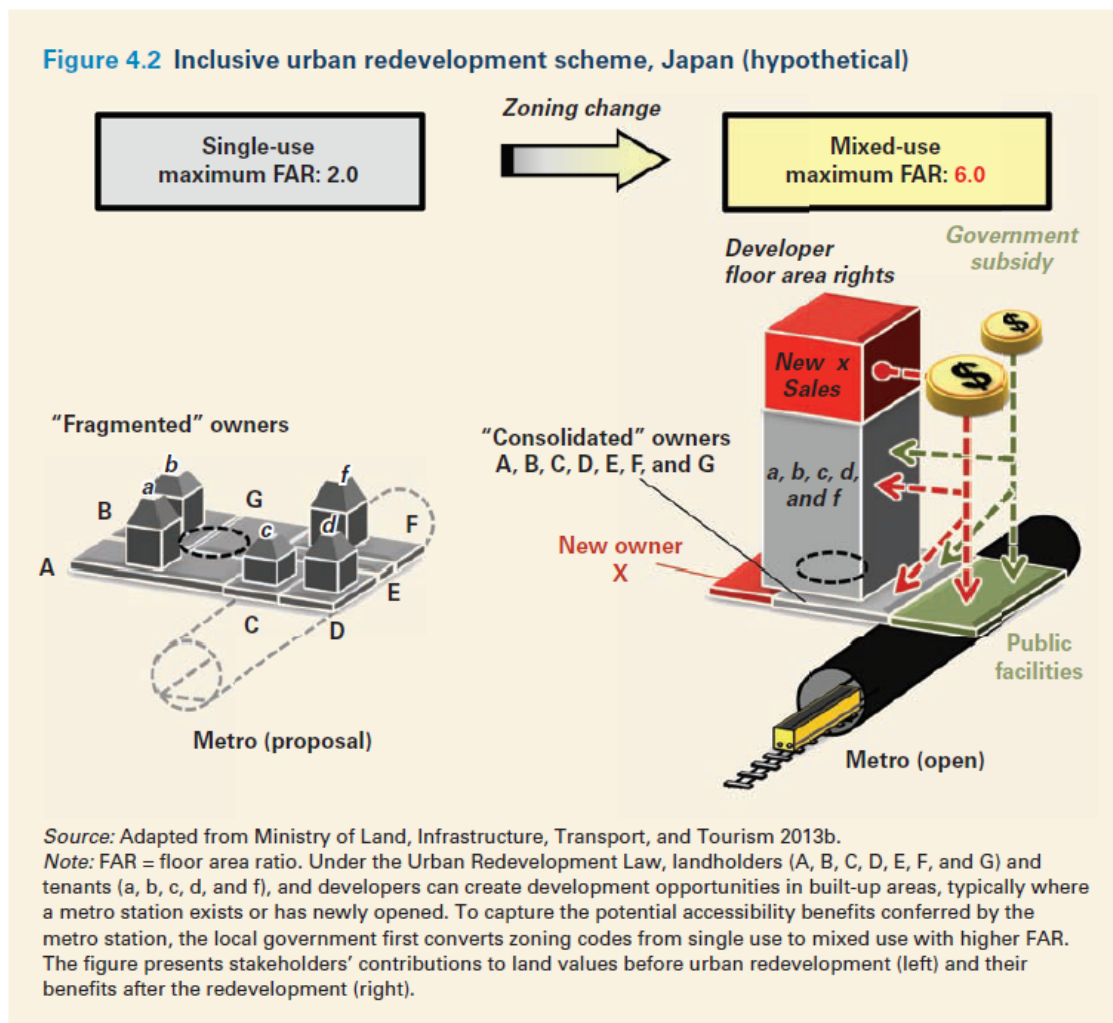


Figure 26: Urban Redevelopment Scheme (Worldbank, 2015)

b) Costs or Risks

Would require provision of new public infrastructure. The sale of surplus floor area could be used to pay for infrastructure costs.

c) Preconditions (When to use it)

- i) In a targeted redevelopment district where market demand for high density development is strong but developable land is scarce.

d) Approval and Application process (where relevant)

- i) Approval

There is no City policy that makes provision for such a mechanism. However, this can form part of a proactive rezoning for targeted areas or an incentive overlay zone, which is provided for the City's Municipal Planning By-Law.

- ii) Application Process

Refer to the Proactive Rezoning and Overlay Zone mechanisms for a description.

e) Advantages and Disadvantages

Advantages	Disadvantages
<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • 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– see figure 2 below.

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 1).

- 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 1).
- 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 2) 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).

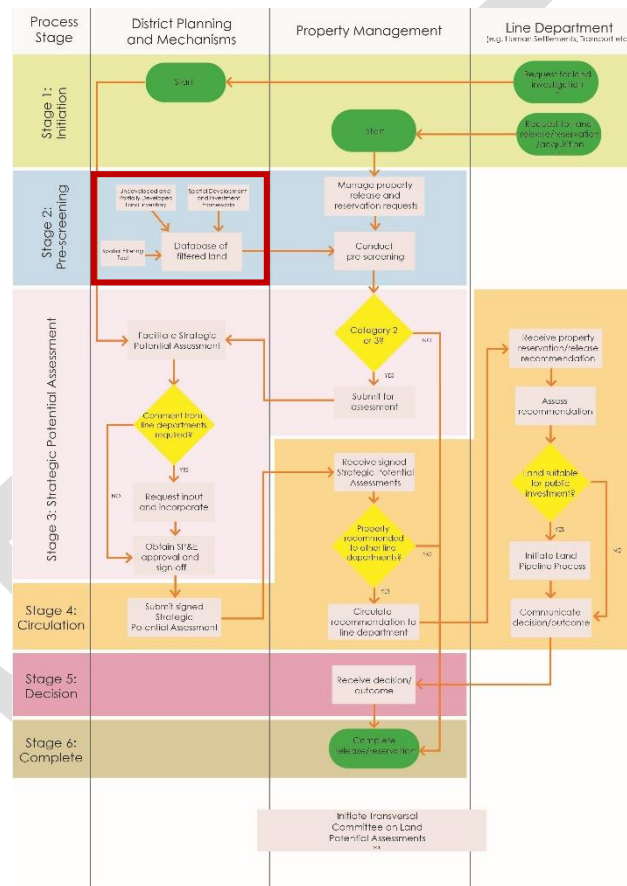


Figure 27: Land Identification Protocol Process Diagram

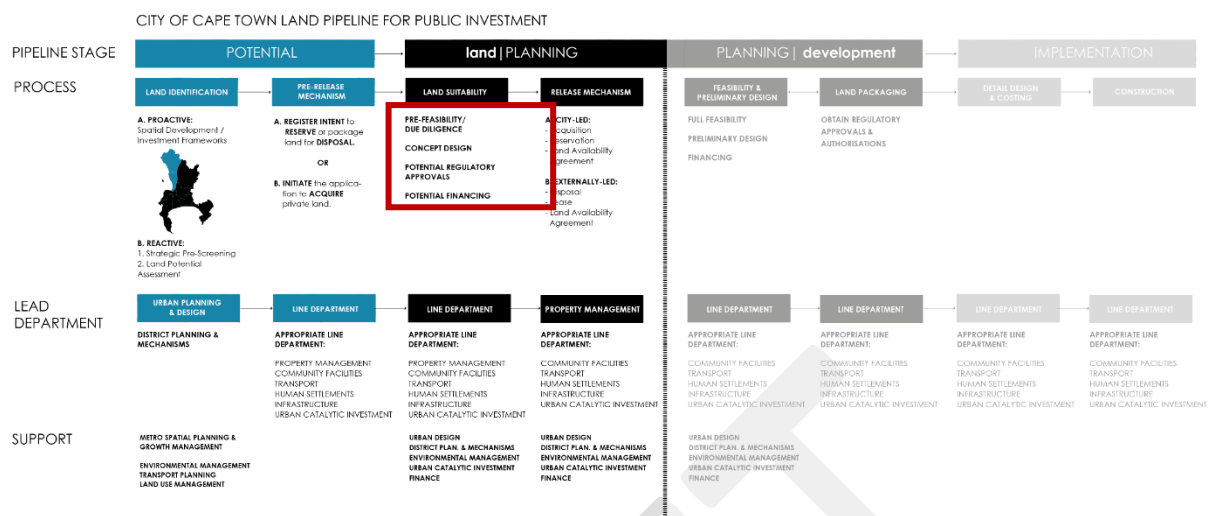


Figure 28: CCT Land Pipeline

b) Costs or Risks

- i) Administrative costs to the municipality.
- ii) 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.
- iii) 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)

- i) 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
- ii) Land that does not fall within these parameters should be considered for alienation by the City.
- iii) 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
<ul style="list-style-type: none">• 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.	<ul style="list-style-type: none">• 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).

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...

Subscribe 155k



Suné Payne

Follow Save More

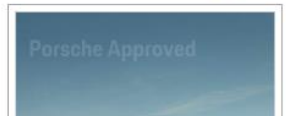
The sale of the Tafelberg site in Cape Town has been a contentious issue in the fight for affordable housing in Cape Town's city centre. On Monday, the Western Cape High Court set aside the sale of the land and told the provincial government and the City to draw up policies that address apartheid legacies in central Cape Town.



Listen to this article
5:34

On Monday, 31 August, the sale of the Tafelberg property in the Cape Town suburb of Sea Point was reviewed and set aside by the Western Cape High Court. The 1.7 hectare site, just 2.5 km outside the Cape...

DISPLAY ADVERTS ON OFF

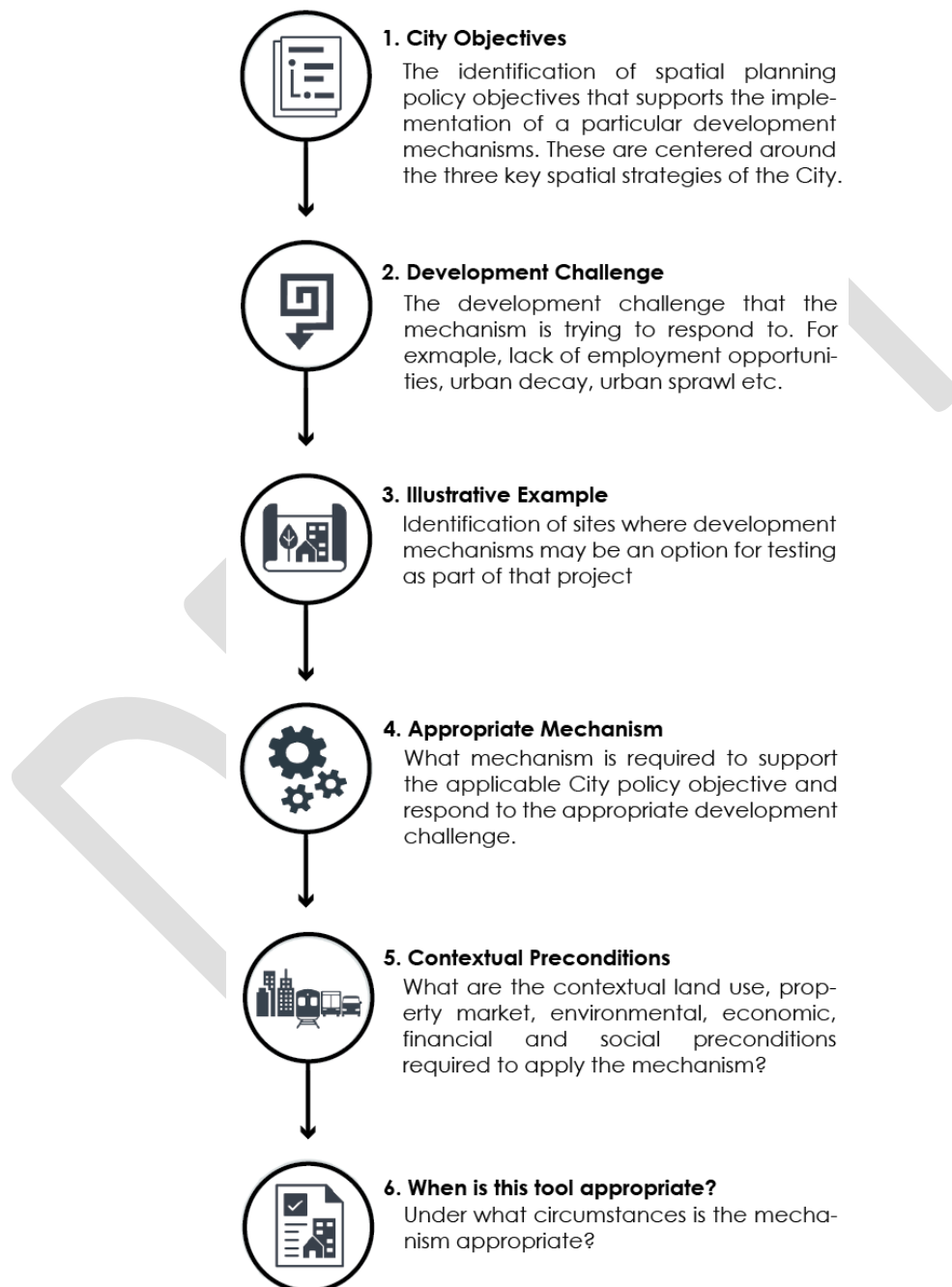


h) Example of where it can be applied:

- Private-owned or externally government-owned land parcels that are deemed strategic.
- Undeveloped and partially developed land throughout the City.

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 B.



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.

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 <ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> 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)	<ul style="list-style-type: none"> Applicable in cities where there is a strong demand for private development 	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> Atlantis Industria Triangle Farm Parow Industria Sacks Circle Landsdowne Industrial (known as Philippi North in ECAMP) Elsies River 	Development Application Fee Waiver	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> Broad Manufacturing Sector Priority Manufacturing Sectors: <ul style="list-style-type: none"> Agro-processing Green technology Electronics and electrical engineering Clothing and textiles Priority tertiary sector include: <ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> Bellville Opportunity Area Philippi Opportunity Area Foreshore Precinct Paardevelei and Athlone Power Station sites TOD Station Nodes 	Catalytic Land Development Pipeline	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> Bellville CBD Voortrekker Road Corridor Wynberg PTI Parow Goodwood Woodstock Salt River 	Urban Development Zone	<ul style="list-style-type: none"> Delineated geographic areas Urban centres and inner city environments (experiencing urban decay) 	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Khayelitsha 	Small Scale Affordable Rental Units	<ul style="list-style-type: none"> There exists a burgeoning market of landlords doing self-build housing in incremental areas 	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> Cape Town CBD 	PT Areas	<ul style="list-style-type: none"> Areas with developed public transport Delineated geographic areas Areas with high population carrying capacity 	<ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> Site fragmented ie. erven too small and/or in separate ownership Land use rights are limiting relative to demand 	<ul style="list-style-type: none"> TOD precinct, where demand exists, land opportunity. Eg Bellville PTI and surrounds 	City-owned Land disposal	<ul style="list-style-type: none"> Ideally, property market in an upswing 	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> Priority TOD Catalytic projects: Bellville, Philippi, Foreshore, Paardevelei, Athlone 	City-owned Land Acquisition (including Land Banking and Assembly)	<ul style="list-style-type: none"> Areas of future opportunity Areas where there is an identified need that the City can fulfil (i.e. public housing) Servicing of land parcels 	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> Cape Town Central CID Observatory CID Athlone CID Parow Industria CID Etc. 	Special Ratings Areas (Improvement Districts)	<ul style="list-style-type: none"> Requires a rates base that can support the SRA. (i.e. not applicable in all areas) 	<ul style="list-style-type: none"> 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. 		✓	✓
		<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Neglected and dysfunctional urban areas. Lack of alternative funding for improved urban management. 	<ul style="list-style-type: none"> 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. 		✓	✓
		<ul style="list-style-type: none"> Bonteheuwel Town Centre 	Precinct Management Model	<ul style="list-style-type: none"> Lack of alternative sources of funding for improved urban management. 	<ul style="list-style-type: none"> 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) <ul style="list-style-type: none"> Site fragmented ie. erven too small and/or in separate ownership Land use rights are limiting relative to demand 	<ul style="list-style-type: none"> TOD precinct, where demand exists, land opportunity. Eg Bellville PTI and surrounds Fisantekraal – Bellville Rail Corridor (land may be 	Land redevelopment or readjustment scheme	<ul style="list-style-type: none"> There is demand for development and private sector interest 	In urbanized area: <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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)			<ul style="list-style-type: none"> Where local property owners are willing to contribute their land to invest in improvements, in exchange for future personal gains 			
		Density bonuses	<ul style="list-style-type: none"> There is strong demand for additional development rights 	<ul style="list-style-type: none"> 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 			✓
	<ul style="list-style-type: none"> Bellville CBD The Voortrekker Road Corridor Wynberg PT1 Parow Goodwood Woodstock Salt River PT1 and PT2 areas with good access to public transport 	Proactive Upzoning / Rezoning (Substitute Zoning)	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> 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. 			✓
DFAs which intersect with areas where there are low or no heritage resources.	<ul style="list-style-type: none"> DFAs which coincidence with areas identified for investigation for heritage exemption 	Heritage Exemption	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> TOD precinct, where land opportunity. Eg Bellville PT1 and surrounds 	Tax Abatements	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Demand for development Private sector-led development 	<ul style="list-style-type: none"> 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.	Individuals who generate income from employment in the informal economy within areas accessible to scheduled public transport routes often experience development challenges and require assistance / support to enable entrepreneurial efforts and SMME development (e.g. appropriate development/land use rights).	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.	<ul style="list-style-type: none"> 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

DRAFT

**TECHNICAL ANNEXURE 13: PUBLIC COMMENTS AND
RESPONSES**

DRAFT

171 Comments (368 sub-comments)					
Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_1.1	Andrew Luger	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	Kirsten Wilkins	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	Paul Bannister	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	Eric Baker	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	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_5	Matthew Silvester	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 (±1400-2400m ²) 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	fD Barron on behalf of other concerned citizens	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	Ann Ferry	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	C Gower	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	Gavin Cooper	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	Roland Wood	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	Lial Hinkel	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_12	Penny Macready	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	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_13	Marko Coetzee	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	Diane Pope	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	Lorraine Finkelstein	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	Jon Cogan	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	Denia Wright	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	Philip Rodwell	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	Cheyenne Currie	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	Lesley Croskery	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	Brian van der Vijver	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	Virginia Thompson	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_23	Caroline Chaplin	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	Gerrard Wigram	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)

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_25	Lindsay Linklater	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	Elizabeth Sole	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	Shirley Blaine	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	Belinda Rycroft	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	Eileen Putterill	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	Mike Brennan	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	Pam Warburton	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	Carol Green	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_33	Chrissie Berry	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	Eric O'Connor	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	FD Barron on behalf of other concerned citizens	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	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_36	Wendy Fourie	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	Cheryl Raath	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	Keith Prinsloo	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	Firdous Alexander			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).
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	Chris Dooner			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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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	Fish Hoek Valley Ratepayers & Residents Assoc.			Supports comments comments by Sunnysdale Ratepayers Assoc. on the draft Masi SDF.	Noted.
S_42.1	Bergvliet Meadowridge Ratepayers Assoc. (Mark Schafer)			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.
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. Ie. 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..

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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 that 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.
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 fuctionality, 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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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.
S_43.1	Simons Town Civic Assoc. (STCA) (Paul Bannister)			Ideal Live Work Play area. Need to reignite & diversify local econ, & town & navy, strengthen economy, reconnect via public transport, utilise under-utilised Navy/Armcor 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 - requires improvement of metrorail. 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	Lara Whittaker	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	Keith Whittaker	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	Vannessa & Sybrand Rousseau	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	Marie Oswald	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	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_48	Sandra Eastwood	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	Val Bennett	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	Debra Bosquet	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	Dave Cowley	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.
H_52	The Safe House (Director Kathy Cronje)			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	Sunnydale Ratepayers Assoc. (Chris Dooner)	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	Gerrard Wigram	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	Keith DM Warburton	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	Igsaan Nordien	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	Paul Cooley	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	Wendy Fourie	District	General	Child-friendly & gender-sensitive 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	J_Mountain	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)

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_60	Heather Edge	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	Juliet Lomborg	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	Lynn Little	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	Max Vey	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	Cedric Bufferler	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_65	Michael Edge	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	Carole Penfold	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	Elzette Henshilwood	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	Genevieve Kalis	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	Jessica Estcourt	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	JaneTaugwalder	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	Mark Kallis	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	Michele Rubin	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	Sheila Knight Dawson	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	Wendy Fourrie	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	Wendy Fourrie	General SDF	sustainability	Innovative urban projects - sustainability	noted

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_74.3	Wendy Fourrie	General SDF	water & sanitation	Urban water management	noted
S.75	Adam Whittington	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	H_Hanekom	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	Margaret Hanekom	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_78	Sarah Wilson	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	Wendy Fourrie	General SDF	Urban Food & Energy security	The City need to comply with the Agenda for Sustainable Development 2030 (see attachments)	noted
S_79.1	Wendy Fourrie	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	Wendy Fourrie	General SDF	Climatechange & sea level rise	highlighting the problem & provides possible solutions	noted
S_79.3	Wendy Fourrie	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	Wendy Fourrie	General SDF	Climate change	climate change foreseen to pose huge problems especially coastal cities. See project drawdown	noted
S_79.5	Wendy Fourrie	General SDF	Solid waste management	city needs to realise economic benefit potential of waste - see Curitiba & Copenhagen examples	noted
S_79.6	Wendy Fourrie	General SDF	Public green & blue spaces	highlights the importance of open spaces	noted
S_79.7	Wendy Fourrie	General SDF	Safe cities	highlights the importance of safe cities	noted
S_78	Arthur McArthur	sub-district	Constantia	Objection to proposed development of 'Nirvana Park'	(see response for S_5)
S_79	Courtney Blandan de Chalain	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	Clare Lindsay	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	Duncan Bennet	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	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_82	J Peter Kleye	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_83.1	Kirsten Wilkins	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	Russell Webb	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	Wendy Robinson	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	Barry Hilderbrand	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	Carol Raubenheimer	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	Deborah Horsell	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	Mike Beaumont	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	Chris Nicklin	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	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_91	Dave_Donuld	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	Fiona Combrink	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	G and I Vogel	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	Linda Gottlieb	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	Lisa Rowell	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	Rose	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	Gavin Cooper	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	Sam Thomas	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	Tania Anderson	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	Lulu Lascaris	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	D_VDS	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_102	Rose	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	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_103	Eric Baker	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	Mike Slayen	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.
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 Giff 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

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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 pypass 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
S_105	Dr Steve Townsend			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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_106	David Broad	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	C Mischker	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	David Park - Ross	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	David Smith	sub-district	Westlake	it is proposed the the SDF enable sport and recretional clubs to explore value adding opportunities to ensure the long term sustainability of these cmmunity 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	E_Henshilwood & Derek Chittenden	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	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_110.2			Noordhoek-NDA's	Propose a new NDA along the southern edge of urban development in 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	Felicity Park-Ross	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	Gordon Laing	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 DSDf's 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	Contact	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	The are differing degree 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. he 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	Hennie Duplooy	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 agreed, and guidance will be reviewed to see if can be improved.
S_114	Hazel Martinussen	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)
S_115	Helen Hayes	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	Jodi Allemeier	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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_117.1	John Hesom	sub-district	Constantia	Suupport 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 inthe 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	Pamela Broad	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	P_J_Lerm	sub-district	Fish Hoek - Cape Farm 38/953	other natural area designation incorrect and innaprriate. 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.
S_120	H_Giles	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	C_Anderson	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)

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_122	C-Lacaris	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	Dylan Botha	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	Hester Vaughan	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	Katherine Heath	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	Tamryn Combrink	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	Tess and John Wallace	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	Felicity Park-Ross	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)
S_129.1	Dagan Naeser	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).

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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 Glencairn 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 from 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 scenic drives/routes (& are already declared ito the Scenic Drives Policy).
S_130	Donna Scott	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	Jonathan Cornell	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	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_132	Patricia Algra	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 Rondobosch 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. Rondobosch 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	Rod Gurzynski	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	Rose Jackson	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	felicity Park-Ross	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	Antoinette Zellhorn	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_137	Benoit Ruscoe	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)

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_138.1.1	M Waldron	general SDF-technical report		inconsistent ito promoting quality open spaces and emphasizes res dev primarily along main roads but propesses 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
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 replensih 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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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 led to massive enhancements to living and lifestyle (e.g. City bowl; Greenpoint; Claremont; Constantia village).
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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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.
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	Chris Dooner	Subdistrict	Far South	Endorsement of the safe house proposal on erf 17775	noted

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_140	Claire Edwards	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	Greta Pegram	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	Jeet Dayal	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)
S_143	Joan Munro	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	JD and Sarah Rowe	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	Jackie Whales	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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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 its impacts on existing job opportunities.
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 erfs 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	Jean Rowe	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	Gregory Mark Hawthorne	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	Contact	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 DSDP 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 DSDP 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. In this transport hubs should not 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	Lindsay Hawthorne	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)
			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)

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
				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	recommends 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	Linda Schmiedeke	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				Contradicting 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.
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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_150.1	M_Olivier	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	Michael J Phillips	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	Michael Zellhorn	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)
S_153	Patrick Conway	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	Pat Denham	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	Rose Simpson	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)

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_156	Ken & Marilyn Anderson	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	Stewart Rowe	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	Susan Jack		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	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_159.1	Rodney Cronwright (on behalf of 6 Constantia restitution families who are/have regaining/ed title to land in Constantia)			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 current
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).
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).

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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.
				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	Laurie Graham	subdistrict	rondebosch	object to the development of low cost housing on Rondebosch golf course	See response to comment for section s_132 above

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_161.1	Gill Naeser	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.)
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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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
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 issuesfor 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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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
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 and 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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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 infrastructure	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 scenic drives/routes (& are already declared into 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	Norman Greenfield	subdistrict- far south		proposals to terminate rail between Fish Hoek & 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	Patrick Dowling	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 terminology issue to be straightened out
S_164	Rod Gurzynski	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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_165.1	Simon Birch	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
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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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.
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	Sarah Hetherington			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).

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
S_167	Carol Leale	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	Cindy Poselthwayte	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.
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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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 than 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	Trish Wood	subdistrict-Far South	spelling	Incorrect spelling "Solole", not "Solele"	Noted. This is incorrect and will be amended.
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 are 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.

Submission Ref No	Contact	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
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 Kompanjiesuin - 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 DSDf	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.
S_170	A_Mispol	subdistrict	Constantia	Objection to proposed development of 'Nirvana Park'. Development of the park illegal as per EMA. Important space for overall wellbeing for the area. Nirvana park is heavily used, safe, and valued by residents and visitors alike.	(see response for S_5)
S_171	D_Spindler	subdistrict	Constantia	Objection to proposed development of 'Nirvana Park'. Development of the park illegal as per EMA. Important space for overall wellbeing for the area. Nirvana park is heavily used, safe, and valued by residents and visitors alike.	(see response for S_5)