



MSDF Public Participation Report

Annexure 1: Comments and Responses

DEPARTMENT/ ORGANISATION	INTERNAL/ EXTERNAL	SUMMARY COMMENT	DISTRICT	CHANGES MADE ON THE MSDF/DSDFS	RESPONSE	COMMENTS FORWARDED TO <DEPT> NAME OR LINK TO DOCUMENTS ON WEB
Dalrrd	External	All agricultural land parcels subjected legally to the provisions of the Subdivision of Agricultural Land Act, 70 of 1970 (SALA) and as defined in the Act, irrespective of its agricultural potential or use, remains subjected to comments / approval from the Department of Agriculture, Land Reform and Rural Development (DALRRD) for subdivision, change of land use or any related matter.	All	No change required to MSDF.	Owners, applicants or their consultants are directly responsible for following the different procedures for land use changes or subdivision of agricultural land. The MSDF document only directs applicants to NDOA for 70 of 70 applications as an independent approval is required.	
Dalrrd	External	The same provisions stated above also prevail, irrespective as to the zoning placed on a land parcel by the municipality through its Land Use Scheme or Spatial Development Framework classification.	All	No change required to MSDF.	Owners, applicants or their consultants are directly responsible for following the different procedures for land use changes or subdivision of agricultural land. The MSDF document only directs applicants to NDOA for 70 of 70 applications as an independent approval is required.	
Dalrrd	External	Any formal change of land use on land subjected to the provisions of SALA needs to be done in accordance with the jurisdiction of SALA.	All	No change required to MSDF.		
Dalrrd	External	Only once a land parcel has been formally excluded from the provisions of SALA, by means of a gazette will such land parcel no longer be subjected to the provisions of SALA	All	No change required to MSDF.	Owners, applicants or their consultants are directly responsible for following the different procedures for land use changes or subdivision of agricultural land. The MSDF document only directs applicants to NDOA for 70 of 70 applications as an independent approval is required.	
Dalrrd	External	It should further be noted that state land, including land that resorted as former homelands areas or tribal areas (where applicable) are currently not subjected to the provisions of SALA. DALRRD, under the provisions of SALA, is therefore not in the position to recommend land use zoning on such areas. However, the SALA Act is in the process of being replaced by the Preservation and Development of Agricultural Land Bill (PDALB) where in all land not within a formal town plan will resort under the provisions of PDALB – thus inclusive of state land / former homeland areas;	All	No change required to MSDF.	Noted.	
Dalrrd	External	In view of the above, it is requested that such land currently not resorting under SALA but having an agricultural potential to be used sustainably for long-term food security, be retained and protected for such use in support towards ensuring long-term national food security.	All	No change required to MSDF.	The City has drafted the Areas of Agricultural Significance layer in association with the Western Cape Department of Agriculture. It is anticipated that the National and Provincial Departments should both use this layer for the protection of agricultural resources.	
Dalrrd	External	The delineated Protected Agricultural Areas (PAAs) - Cultivation has the aim to identify, delineate and protect agricultural land having a high agricultural potential for cultivation purposes;	All	No change required to MSDF.	The City has drafted the Areas of Agricultural Significance layer in association with the Western Cape Department of Agriculture. It is anticipated that the National and Provincial Departments should both use this layer for the protection of agricultural resources.	
Dalrrd	External	Provision has been made for two types of PAAs namely Rainfed PAAs - having a priority rating ranging from A, being the highest priority to F, being the lowest priority and Irrigation PAAs - having a priority rating ranging from A, being the highest priority to D, being the lowest priority;	All	No change required to MSDF.	Noted.	
Dalrrd	External	The potential of agricultural land for grazing purposes still need to be finalised and is in the process of being developed;	All	No change required to MSDF.	Noted.	
Dalrrd	External	Any agricultural land, as defined, and located outside of the current delineated cultivation PAAs and proposed grazing PAAs, in process, that are still subjected to the provisions SALA will be evaluated on its own merits against its contribution to agricultural production within the larger agro-ecosystem;	All	No change required to MSDF.	Noted.	
Dalrrd	External	It should also be mentioned that the PAAs take cognisance of formal approved town planning ordinance areas – areas that are formally excluded from the provisions of SALA, prior to 1994 – as per the definition in the Act. Where possible the delineation of the PAAs aim to exclude such areas but in certain instances the complete town is engulfed by high potential agricultural land. In such instances the PAA's delineation overlaps the town area but the status of such urban area is acknowledged as not being subjected to the regulations of the PAA;	All	No change required to MSDF.	Noted.	
Dalrrd	External	Where such high potential agricultural land is located within state land areas (land belonging to the state / government) or areas that were formally regarded as homelands area, these areas were evaluated and where it was determined that such areas have a high agricultural potential for long-term sustainable food production, it was demarcated and delineated as a PAA;	All	No change required to MSDF.	Noted.	
Dalrrd	External	The delineation of the PAAs has been done per available cadastre boundaries. Where there were no cadastre boundaries available, other visible land use features such as rivers; roads etc. was used to assist with the delineation as far as possible, in relation to the agricultural potential of the area;	All	No change required to MSDF.	Noted.	

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Dalrrd	External	From a Land Use Management Scheme perspective it is recommended that all land parcels within a PAA be zoned as "Agriculture 1" (irrespective of the PAA's priority rating) and that the remaining agricultural land parcels outside of the PAAs be zoned "Agriculture 2".	All	No change required to MSDF.	The City is not in a process of zoning land at present. The Western Cape and the National Department of Agriculture should reconcile inputs before it is given to the City.	
Dalrrd	External	The above recommendation zonation may be adjusted in future when the proposed agricultural zoning classes have been finalised. In these classes provision has been made for 1) National Protected Agricultural Areas – similar to Agriculture 1 mentioned above; 2) Provincial Agricultural Areas; 3) Primary Agriculture; 4) Mixed Agriculture.	All	No change required to MSDF.	The City is not in a process of zoning land at present. The Western Cape and the National Department of Agriculture should reconcile inputs before it is given to the City.	
Dalrrd	External	From a Spatial Development Framework perspective it is recommended that all PAAs be included within the SDF that is to guide the priority of the area concerned and preservation of these areas for agricultural production purposes.	All	No change required to MSDF.	The MSDF has to include all land within the municipal jurisdiction.	
Dalrrd	External	In the assessment attention was given to the areas already excluded from the provisions of the Sub-division of Agricultural Land Act, 70 of 1970 (SALA), with emphasis on Departmental data pertaining to the delineation of agricultural land as defined under SALA (former excluded town planning ordinance areas) as well as areas delineated according to former guide plans' classification classes.	All	No change required to MSDF.	Noted.	
Dalrrd	External	In addition to the mentioned, areas that have, according to Departmental records, not yet been excluded from the provisions of SALA but have no longer an agricultural potential have been flagged for exclusion.	All	No change required to MSDF.	The Western Cape and the National Department of Agriculture should reconcile inputs before it is given to the City.	
Dalrrd	External	Based on the above mentioned an "Agric Edge" was compiled that demarcated all areas excluded from the provisions of SALA prior 1994 as well as areas earmarked for exclusion. Areas within the Agric Edge area is currently or in the process of no longer being regarded as agricultural land as defined under SALA, whereas areas outside (outer areas) of the Agric Edge is still regarded as agricultural land.	All	No change required to MSDF.	The Western Cape and the National Department of Agriculture should reconcile inputs before it is given to the City.	
Dalrrd	External	Mapping comments : refer to the pdf submission for detailed map comments	All	No change required to MSDF.	Noted.	
CoCT Sustainable Energy Markets	Internal	City's utility scale renewable energy generation projects (Atlantis, Paardevelei and Athlone) We note that the Table Bay DSDF refers to the APS site as a "mixed use precinct" which is not aligned with the Energy Directorate's plans (previously shared with you) to develop the site as an Energy hub.	Table Bay	Minor changes to MSDF maps and text.	This has been addressed in both the District Plan and MSDF.	
Department of Public Works	External	The MSDF civic nodes will be considered as part of the PPD business process and how it aligns the prioritised Spatial Investment Strategy areas	All	No change required to MSDF.	Noted.	
Department of Public Works	External	It is requested that a workshop be arranged with the City Spatial Planning to ensure continued integrated planning	All	No change required to MSDF.	Meeting took place and information was exchanged.	
Department of Public Works	External	See original comments submitted for a list of prioritised areas/ mesozones for the City of Cape Town, areas identified in the Gap analysis for provision of social services within the City of Cape Town	All	No change required to MSDF.	Noted.	
Western Cape Education Department	External	WCED have 3 to 4 priority areas identified for implementation over the next few weeks in order to create school capacity next year. The areas mentioned in the meeting include Wallacedene, Nomzamo, Mfuleni and Delft.	All	Included in the implementation Ch 6.	Priorities forwarded to DSDF Teams.	
Western Cape Education Department	External	Nomzamo/Lwandle precinct development of a campus of schools – Farm 187/918, Division Stellenbosch. This site will be used for the development of a new high and primary school. A mobile school is also currently being established on this site	All	No change required to MSDF.	Priorities forwarded to DSDF Teams.	
Western Cape Education Department	External	Delft – The vacant land adjacent to Rosendaal High School – Erf 3715, Delft. This site will be used for the development of a new school.	All	No change required to MSDF.	Priorities forwarded to DSDF Teams.	
Western Cape Education Department	External	Atlantis – The vacant land adjacent to Saxonsea High School – Erf 1500, Atlantis. This site will be used for the development of a new school.	All	No change required to MSDF.	Priorities forwarded to DSDF Teams.	
Western Cape Education Department	External	Atlantis – The vacant land opposite Robinvale High School – Erven 3787 and 3818, Atlantis. This site will be used for the development of a new school.	All	No change required to MSDF.	Priorities forwarded to DSDF Teams.	
Western Cape Education Department	External	Belhar – The vacant land adjacent to Excelsior High School – Erf 20112, Belhar. This site will be used for the development of a new school.	All	No change required to MSDF.	Priorities forwarded to DSDF Teams.	
Western Cape Education Department	External	Houtbay – Utilising the existing buildings of the former Dominican Grimley school to establish a new primary and high school – Erf 2770/Re, Hout Bay	All	No change required to MSDF.	Priorities forwarded to DSDF Teams.	

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Western Cape Education Department	External	Durbanville HS hostel – utilising the vacant school hostel for the development of a new school. Erf 41/Re, Durbanville	All	No change required to MSDF.	Priorities forwarded to DSDF Teams.	
Western Cape Education Department	External	Mfuleni – Developing a Junior HS on Erf 11387, Mfuleni	All	No change required to MSDF.	Priorities forwarded to DSDF Teams.	
Western Cape Education Department	External	Retreat – Developing a School of Skills on Erf 107335 – property adjacent to Crestway HS	All	No change required to MSDF.	Priorities forwarded to DSDF Teams.	
Western Cape Education Department	External	Diep Rivier – Utilizing the former Central PS in Retreat for the establishment of a new school – located on Erven 79064 to 79072.	All	No change required to MSDF.	Priorities forwarded to DSDF Teams.	
Private	External	Glencairn Wetlands Reserve included as a reserve in the SDF. A newer development is the pending application for the ELSE River Reserve which was voted on at the GESEE AGM – this has wider implications than the SDF but needs to be considered therein	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	With regards to the zoning regulations all properties in the greater Glencairn area, including Dido Valley, could have 3 dwellings on them. The potential population of Glencairn needs to be estimated in terms of services and amenities required, including Early Childhood Centres, schools, youth and community spaces as well as health, social and security services and sporting needs	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	There is currently no provision for entry level gap housing in Glencairn or Dido Valley of young and low paid professionals. Any future development should address this shortage, especially with the current retirement village and low cost housing provision.	Southern	No change required to MSDF.	Comment forwarded to DSDF Team. Housing programme are generated under the Human Settlements Implementation Plan. Please refer to online version with annual projects and locations.	Human Settlements
Private	External	Glencairn and Welcome Glen have the potential for market gardens especially as the Glencairn Valley was a farming community so the soil and water conditions are favourable for market gardens	Southern	No change required to MSDF.	Forwarded to DSDF Team.	Future Planning & Resilience, Food Actors
Private	External	Map 5g: Areas with Land Use approvals, such as Bella Riva & Crammox (all Northern District) all shown as "GI". All of these sites are inside the Urban Development Edge (such as Paardevelei in Helderberg as well), and earmarked for urban development. 1. What does it mean? Also if a land use/ EIA application is lodged? 2. What will be 'legal status' of GI?	All	No change required to MSDF.	Tech Suppl A (p129) and Tables A1a & A1b highlights that certain layers like the GINet is only for information – if it is not to be utilised for consistency check. LUPA Section 19 provides definition clarity regarding the difference between compliance or consistency with, and deviation from spatial development frameworks or structure plans. The following policy aspects have been found to be the most common issues that directly test the consistency prescripts of the MSDF (Table A1a). Table A1b offers clarity on the additional types of flags that could be picked up by using the MSDF for early determination of land use/ development applications. Table A1b offers suggestions on the issues to be considered but is not to be used in determination of consistency with MSDF policy.	
Urban Dynamics WC	External	With reference to the currently advertised draft MSDF and Northern District Plan. We submitted a written comment on behalf of the Altygedacht Farm (Farm 18/276 Durbanville) on the draft Northern District Plan in January 2020. In the latest 2022 Volume 4 Annexures of the City's Northern District Plan, our comment is summarised together with a short response from the City (refer attached extract), basically rejecting all comments provided. The response from the District Spatial Planners imply that the proposals for Altygedacht require broader consideration at metropolitan level. We believe that a strategic discussion is required with the Spatial Planning Departments at District and Metropolitan level, as there are broader considerations as well as localised specific conditions worth considering	Northern	No change required to MSDF.	Argument is about increasing the viability of the farm, by allowing some form of urban development. But no mention is made of portions of the farm being disposed of in the past, also affecting the viability. The farm has heritage value and forms part of the Agricultural Areas of Significance, as part of the Durbanville Winelands Area. The Council considered the Urban Development Edge submissions as part of the larger process. Arguments raised can be followed there.	
Urban Dynamics WC	External	written comment was submitted during initial advertising of the draft Northern District Plan, in January 2020. With reference to the previously submitted comment, it is noted that the City did not incorporate any changes to the Northern District Plan or MSDF in response to the comments submitted. Volume (4) of the draft Northern District Plan (2022) includes a summary of the comments / arguments previously submitted, with a concise unsubstantiated response by the City, which in our view do not consider the complexity and considerations relating to the farm Altygedacht and its spatial designation as 'Discouraged Growth Area' in terms of the City's draft spatial policies.	Northern	No change required to MSDF.	The Council considered the Urban Development Edge submissions as part of the larger process. Arguments raised can be followed there.	

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Private	External	Highlands Estate offers no Agricultural Economic or food security capabilities to the Western Cape or the country. For the reasons above I recommend that Highlands Estate be excluded from Agricultural restrictions which applies to the greater PHA which prohibits infrastructure installation i.e. bulk infrastructure (Stormwater and sewer pipes)	Cape Flats	No change required to MSDF.	Forwarded to DSDF Team. Highland estate is excluded from the Urban Development Edge.	
Urban Dynamics WC	External	The objective of the owners is to formulate an integrated sustainable development solution that will in fact contribute towards safeguarding and promoting the long-term sustainability of the Altydgedacht farm as a productive agricultural entity. To achieve this, alternative sources of capital investment is urgently required, which will be raised by allowing some form of development on selected portions of the farm. In this regard, it is contended that the City's MSDF and Northern District Plan should acknowledge the potential to accommodate development on portions of Altydgedacht, subject to detailed assessments and relevant studies.	Northern	No change required to MSDF.	The Council considered the Urban Development Edge submissions as part of the larger process. Arguments raised can be followed in the report attached to the Recommendation Report to Council for approval of the MSDF. Applicants can at any stage submit applications for land use changes.	
Urban Dynamics WC	External	In this regard, when looking at the Altydgedacht Farm and its surrounding context, it is noticeable that the recent extension of Jip de Jager Avenue (link to St Johns Road) as a Class 2 route, and the inclusion of the triangular land portion into the urban area, change the context of Altydgedacht dramatically. Development has been approved and constructed hard up onto the Altydgedacht boundary to the south-west and development of the triangle is now anticipated / imminent. Furthermore, similar to the triangle land, Altydgedacht is now surrounded by high order mobility roads and established urban development on 3 of its boundaries. The southern portion of Altydgedacht is therefore a logical transitional area framed by established mobility roads, between the established urban environs and the agricultural hinterland, while environmental and heritage impacts can be mitigated through sustainable development proposals. The northern portion of Altydgedacht is in fact the primary agricultural land forming part of the Durbanville Hills area, which should be the focus of agricultural conservation.	Northern	No change required to MSDF.	The Council considered the Urban Development Edge submissions as part of the larger process. Arguments raised can be followed in the report attached to the Recommendation Report to Council for approval of the MSDF. Applicants can at any stage submit applications for land use changes. The Department of Agriculture opposed the inclusion of the triangle part of the farm inside the UDE. The specialist reports and submission into LUPA will have to resolve the matter.	
Urban Dynamics WC	External	The fact that the Altydgedacht Farm is part of the Durbanville Hills Cultural Landscape and is bounded by two scenic routes, presents the opportunity for a development proposal on the farm that will have to be extremely well planned and designed in a sensitive manner, responding to site and contextual sensitivities and celebrating the rural context and environs. Any proposals will have to undergo assessment of all relevant sensitivities and in terms of relevant legislative processes. The principle of its potential should however be encapsulated in the MSDF and Northern District Plan, which are currently simply not considered.	Northern	No change required to MSDF.	The Council considered the Urban Development Edge submissions as part of the larger process. Arguments raised can be followed in the report attached to the Recommendation Report to Council for approval of the MSDF. Applicants can at any stage submit applications for land use changes. The Department of Agriculture opposed the inclusion of the triangle part of the farm inside the UDE. The specialist reports and submission into LUPA will have to resolve the matter.	
Urban Dynamics WC	External	The heritage value of the farm is undisputed. In fact, the owners are planning to renovate buildings and revitalise the historical farm 'werf' to celebrate its history and heritage. The District Plan identifies Altydgedacht as a 'Destination Place', which is positively supported, but requires funding and significant capital investment to ensure it is a truly celebrated destination place. Without alternative capital injection, the continued cost of maintenance of the historical buildings is simply not sustainable. It is proposed that development on portions of the farm within the identified 'urban-rural transitional area', inclusive of a tourism node around the historical farm 'werf' will generate the required funding to maintain the heritage of the farm, but more so to celebrate the heritage by revitalising the heritage core of the farm, thereby enhancing the potential public benefit to the broader community. The objective is to accommodate development on a portion of the southern transitional area of Altydgedacht, while the majority (85%) of the farm will remain agricultural land, which can be more productively farmed due to the capital investment forthcoming from the development in the transitional area of the property. On this basis, the concern with regard to impacting the heritage value of area of Agricultural Significance, is in fact mitigated and positively celebrated. The facts are that the context of Altydgedacht has changed dramatically, with established major mobility road infrastructure and developments right onto the boundaries of southern transitional parts of Altydgedacht. These changes to the area contribute to the challenges faced by the farm in surviving as an agricultural enterprise, while also contributing to the logical potential of the site as a transitional area of development between uniform urban developed areas and	Northern	No change required to MSDF.	The Council considered the Urban Development Edge submissions as part of the larger process. Arguments raised can be followed in the report attached to the Recommendation Report to Council for approval of the MSDF. Applicants can at any stage submit applications for land use changes.	
MLM Planners	External	Garden Cities Land : Not appropriate for the City to be identifying the Garden Cities landholdings beyond the urban edge as "core biodiversity area Pending legal opinion on Gardens City	Blaauwberg	No change required to MSDF.	Noted concern raised in legal letter. The decision of Council will be recorded in the Urban Development Edge report which is an attachment to the Report to Council for the recommendation of the approval of MSDF and DSDFs.	

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Urban Dynamics WC	External	On the basis of the above, it is therefore recommended that the City, in proceeding with finalising the MSDF and Northern District Plan, should carefully consider the southern transitional portions of the Altydgedacht farm as a strategic site with development potential, as it did with the transitional triangular land portion.	Northern	No change required to MSDF.	It has been considered but a decision will be taken by Council based on the Urban Development Edge report (attached to the Council recommendation for approval of the MSDF and DSDFs).	
Urban Dynamics WC	External	The comment on the District Plan and MSDF in terms of the Altydgedacht farm is site-specific to Altydgedacht and not a copy-paste type analogy that can be applied to other urban fringe farms. This is evident in the most unique attributes of the farm and its contextual informants, i.e. existing infrastructure, topography, abutting developments, agricultural patterns, etc. As mentioned above, by allowing a small portion of the farm to be developed (±15%), the integrity and significance of the bigger agricultural area will not be compromised but strengthened. In fact, by allowing a landmark sustainable development on a portion of this farm, the farm will be able to become a rightful and significant fully productive attribute to the agricultural environs. The inclusion of the transitional triangular land parcel into the urban edge is positively noted, which (together with the already developed infrastructure and abutting developments to the south) will / have indeed change/d the context of the cultural landscape and rural environs around Altydgedacht. However, the proposals for the Altydgedacht farm are not reliant on the proposals for the triangular land parcel, but are based on the site specific considerations of the farm itself, while also responding most sensitively to contextual informants. Allowing appropriate scale and form of development on selected portions of the southern transitional portions of Altydgedacht will not detract from the heritage and cultural landscape, as it can be planned with nature and set into the landscape to contribute most positively to an appropriate transition of use and intensity of use on the urban fringe area.	Northern	No change required to MSDF.	The Council considered the Urban Development Edge submissions as part of the larger process. Arguments raised can be followed in the report attached to the Recommendation Report to Council for approval of the MSDF. Applicants can at any stage submit applications for land use changes.	
Urban Dynamics WC	External	The City's strong spatial policy directive towards inward development and densification as the only means of accommodating the rapid population growth in the City, ignores the fact that there are certain market segments that can simply not be addressed in inward densified development. Other constraints to inward development, relating to engineering service constraints in established areas, are also not considered (ex. Voortrekker Road corridor, other infrastructure constraints like major sewer WWTW constraints). In this regard, site specific considerations and sustainable development proposals on transitional greenfields land cannot be ignored and simply rejected by the City. Spatial policy should incorporate mechanisms and opportunities to unlock development on strategic land that can illustrate a rational logic for development, limit impacts on sensitive agricultural and heritage resources, propose sustainable services solutions, and present opportunities for economic growth and sustainable development.	Northern	No change required to MSDF.	Refer to the UDE Report	
Urban Dynamics WC	External	With reference to the currently advertised draft MSDF and Tygerberg District Plan. We submitted a written comment on behalf of the Saxenberg Farm (Farm 419 & 245) on the draft Tygerberg District Plan in January 2020. In the latest 2022 Volume 4 Annexures of the City's Tygerberg District Plan, our comment is summarised together with a short response from the City (refer attached extract), basically rejecting all comments provided. The response from the District Spatial Planners imply that the proposals for Saxenberg require broader consideration at metropolitan level. We believe that a strategic discussion is required with the Spatial Planning Departments at District and Metropolitan level, as there are broader considerations as well as localised specific conditions worth considering.	Tygerberg	No change required to MSDF.	The proposed urban development edge have been drawn taken cognisance of the existing urban development and the rounding off of the urban-rural edge with appropriate development along the Zevenwacht Link Road. Any farming unit comprises both low and high potential agricultural land and although certain low potential land is not always viable for cultivation, it can be used for many other uses related to the farming operations. These would include tourist related and conservation activities permitted on Agriculture zoning which could be used to create a transition into the agricultural rural environ and celebrate the function as a key gateway to the Stellenbosch wine route.	
Tommy Brummer Town Planners	External	MSDF: Proposal for Farm 845 must remain outside the urban edge and the Draft MSDF must be amended accordingly See pdf for detailed comments	Helderberg	No change required to MSDF.	The farm was already in the Incremental Growth and Consolidation area in the 2018 approved MSDF. There is an EIA ongoing and Department of Agricultural has agreed to the land been developed for conventional urban development.	
Tommy Brummer Town Planners	External	DSDF: Conflicting maps in the DSDF shown as a "new development area" inside the proposed urban edge. On the detailed sub-district 6 map, the site is shown as being located outside the urban edge and indicated for "high density residential development". site must remain outside that urban edge and that the designation for high density urban development is not supported	Helderberg	No change required to MSDF.	The farm was already in the Incremental Growth and Consolidation area in the 2018 approved MSDF. There is an EIA ongoing and Department of Agricultural has agreed to the land been developed for conventional urban development. The District and Metro SDFs have been aligned and corrected where needed	

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Private	External	The City's response fails to consider the serious challenges faced by the Altydgedacht farm in terms of its inability to continue operations as a sustainable and viable agricultural entity, most of which do not relate to the current extent of the farm. The owners are not contending that the extent of the farm is inhibiting its viability, but rather that the locality of the farm on the urban fringe is affecting the ability of the farming operations, i.e. security, water scarcity, land invasions, etc. The intention is not that the farm be developed in its entirety, but rather to allow a small component of development (± 15% of the total farm area), within the identified 'urban-rural transitional area', to thereby contribute towards capital funding to sustain the remainder farm. Major infrastructure upgrades are required on the farm to enable vineyard irrigation, to upgrade the wine cellar and to maintain the historical buildings on the farm, costs which can simply not be funded from the agricultural production on the farm.	Northern	No change required to MSDF.	The Council considered the Urban Development Edge submissions as part of the larger process. Arguments raised can be followed in the report attached to the Recommendation Report to Council for approval of the MSDF. Applicants can at any stage submit applications for land use changes.	
MLM Planners	External	Propose that a wider urban development edge line be drawn as it will provide for a greater and more inclusive scope for planning exercises for the developable portions of De Grendel land holdings	Tygerberg	No change required to MSDF.	The area is identified as a Site of Co-incidence meaning that even though the area is earmarked for new development, the relevant specialist studies (in view of agricultural potential, biodiversity presence and cultural/ heritage landscape) and application process outcomes (EIA & LUMS) will eventually determine the exact delineation of the urban development edge. Therefore, the urban development edge line at De Grendel farm has been indicated as a notional line to be further refined through the relevant specialist studies as indicated above. This has also been done in consultation with the Department of Agriculture. Furthermore the current delineation considered Giel Basson Drive (future IRT route) & Platteklouf Road where lower intensity mixed use development can be supported along these routes, with medium density residential development inwards. The urban development edge also does not mean that the owners cannot undertake an integrated planning exercise for their land holdings. However, complimentary land uses such as tourism, conservations etc can be accommodated outside the urban edge on the agricultural hinterland. It needs to be noted that during the first public participation process on the first draft DSDF, the content in this regard has been supported. Therefore, the latest position from the consultant is somewhat confusing insofar as the motivation does not clarify the change in viewpoint.	
Cape Winelands Airport	External	Add the Cape Winelands Airport to the "Additional Spatial Informants" in Table 5.5	Northern	Minor amendment to MSDF text.	Multiple other airfields/ strips are part of the critical infrastructure supporting the CTIA.	
Cape Winelands Airport	External	Amend the urban edge to be a straight line from Cape Winelands Airport's northern most point to join the edge line at the proposed Bella Riva Estate, directly east of the WWTW	Northern	No change required to MSDF.	Urban edge inclusion: The principles/ requirements followed for 'rounding off' the urban edge, when delineation was done for the draft DSDF's, was based on: 1) Portions of properties already included in the 'Consolidation Areas' (2018 MSDF), i.e. where the 4 ha polygons already straddled boundaries of adjacent properties; 2) Such properties already, over time, were subject to development pressures, and/or where development proposals were discussed over time; 3) In this instance, the property to the west of the Airport was only included for the sole reason that it was 'boxed' in, due to the cadastral characteristics of the airport property. The properties been purchased by the developer, is in terms of the MSDF (2018), as well as the final draft MSDF (2018), indicated as Agricultural Areas of Significance. This determination was done in collaboration with Department of Agriculture. There are no factual reasons why such properties should be included in the Urban Development edge, i.e. no development application has been discussed/ received for consideration, with the required specialist studies. Also note that 'mining areas' are not considered as 'urban uses', and are therefore not included in the Urban Development edge/ indicated as Consolidation Areas. Once a development application on the subject properties has been duly considered by the relevant authorities (inclusive of all required specialist studies), the edge may be moved to include the proposed development, and such area be indicated as Consolidation Areas. Note that the Urban Development Edge does not preclude urban development (although it will imply a deviation from the MSDF, and needs to be motivated accordingly), i.e. development applications will still duly be considered by Council, based on the required specialist studies & desirability in terms of the provisions in the approved MSDF as well as Section 99(1) of the DMS.	
Cape Winelands Airport	External	Amend Map 5 (d) by showing Portion 23 of Farm 724 Joostenbergs Vlakke and the Remainder of Farm Joostenberg Vlakke in dark orange as "Incremental Growth and Consolidation Area".	Northern	No change to MSDF required.	Refet to UDE & CE Report for UDE adjustments accommodated	
Cape Winelands Airport	External	Delete all areas indicated as "Green Infrastructure Network" on Map 5 (g): Should the "Green Infrastructure Network" not be deleted in its entirety, amend Map 5 (g) by showing the entire Cape Winelands site, zoned as Transport 1 and used as an airport, in grey as "Urban footprint"	Northern	Minor amendment to MSDF Maps.	Updated where necessary and in a consistent way.	

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Cape Winelands Airport	External	Portion 23 of Farm 724 Joostenbergs Vlakke and the Remainder of Farm Joostenberg Vlakke should be shown in "blank" as is the case for Greenville Erf 4.	Northern	No change required to MSDF.	These sites have been included in the Green Infrastructure Network (GINet) as they provide green infrastructure services. The portion/s are part of a larger GI polygon, in which it was identified that there was potential to improve water pollution assimilation. Also, that the space contributes (low) to flood control assistance or protection. Whether those apply to the specific portions in question is not confirmed, but is illustrative of aspects that should be considered on a site specific basis, if/ when further development happens. A site being identified as part of the GINet does not preclude it from the development process. The GINet guidelines provide information on how development could take place in such a way as to reduce the impact on the green infrastructure services the site provides. Please refer to the DSDF GINet section.	
Cape Winelands Airport	External	Amend Map 5 (d) by showing the entire Cape Winelands Airport site which is zoned as "Transport Use 1 with a permanent consent for airport" in dark orange as "Incremental Growth and Consolidation Area".	Northern	Minor amendment to MSDF Maps.	If they have full development rights, i.e. EIA and LUMS, then the MSDF and DSDF will show urban development as it has an overwhelming probability that it will be developed. Until a confirmed Environmental Authorisation, the Critical Biodiversity will be visible, as it is not a given that the CBA will be compromised. CBA on DSDF maps means that no development is expected on this portion of the site (without a site specific motivation applying for a deviation) and that the applicant/ developer would have to follow an EIA process which will help to confirm the delineation of the sensitive components of the site to develop any part thereof. Noting that often on the Bionet, the CBA remains for years after the approvals to NEMA or MPB-L until such time as the vegetation removal is completed and replaced by buildings. For the interim, the data will remain on the Bionet for in case the development does not go ahead. The Bionet gets used for calculating targeted protection and will only be adjusted if fully compromised and in some cases development rights or approvals may lapse. As the site is planned to be developed in future, it has been incorporated as Incremental Growth & Consolidation Area on Map 5d Consolidated Spatial Plan Concept map, which depicts the envisioned future state for the site.	
Cape Winelands Airport	External	Correct Map 2d: "Open Space system and destination place" (p 28) with the same changes made to Map 5 (g).	Northern	No change required to MSDF.	Map 2d and 5 g are similar.	
Cape Winelands Airport	External	Update the City's Biodiversity Network Map with the information contained in the "Botanical constraints study of Fisantekraal Airport site by Nick Helme Botanical Surveys, August 2020."	Northern	Minor changes to Biodiversity map.	Although the version of the Biodiversity Network used in the SDFs is timestamped May 2021 and an official Biodiversity Network update is not yet ready, this particular site has now been edited in the SDFs to reflect the City of Cape Town Biodiversity Management Branch's assessment of the Helme report.	
Cape Winelands Airport	External	Amend Map 5 (b) in respect of Cape Winelands Airport's Critical Biodiversity Area to exclude areas with no biodiversity sensitivity as established through seasonally correct ground-truthing by a botanical specialist (the Helme report).	Northern	Minor changes to Biodiversity map.	Although the version of the Biodiversity Network used in the SDFs is timestamped June 2021 and an official Biodiversity Network update is not yet ready, this particular site has now been edited in the SDFs to reflect the City of Cape Town Biodiversity Management Branch's assessment of the Helme report.	
Environmental Management Department	Internal	Refer to the PDF for grammatic errors picked up and fix in the Master doc	MSDF	Minor changes to Biodiversity map.	Noted and corrected.	
Environmental Management Department	Internal	This map (Map 2b) is misleading and incorrect. It is missing an important land use category for protected and conservation areas. Proclaimed Nature Reserves and National Parks cannot be categorised as Mixed Use, Vacant, Civic related or Agricultural Land	MSDF	No change required to MSDF except for addition in header of map.	This map is a reflection of the overall use categories as per the General Valuation Roll, not zoning. It is a reflection of land use from a Valuation Department view. This is high-level land use and it shows high-level land use categories, and not land cover / topo details. There is no sense in trying to exclude / include certain land use or re-categorise because the Valuation Department's overall use categories are an entire workflow on its own.	
Environmental Management Department	Internal	Map 2a This map needs a footnote explaining what open space consists of. This shows various land use categories, some of which are more permanent (e.g. National Park) than others. The BioNet should be overlaid on top of the GIN on this map. All nature reserves (protected areas and conservation areas) should be shown, not just TMNP.	MSDF	Minor changes to GINet map.	Please see footnote 6 which precedes map 2d. Table Mountain National Park has been given the same symbology as the rest of the GINet and a note in the legend explains that is a "non-evaluated component of the GINet". These maps are to showcase the GINet extent with the protected & conservation areas featuring on MSDF Map 5b.	
Environmental Management Department	Internal	Macassar Pavillion has been demolished and won't be rebuilt. How can this be a Destination Place? Refer to map 2a Open space system and destination places	KMP	No change required to MSDF.	The access to the sea and beach will remain a destination place during peak holidays, with or without a pavillion.	
Environmental Management Department	Internal	Steenbras Dam is off-limits to the public due to the wellfield. Why is it shown as a Destination place? Refer to map 2a Open space system and destination places	Helderberg	Minor amendment to MSDF Maps.	Map corrections made.	
Environmental Management Department	Internal	Refer to Map 2e: Population Density...Why does this show people living throughout False Bay Nature Reserve, including the open water bodies, especially Zeekoevlei?	Cape Flats/ KMP	No change required to MSDF.	It shows a very low density if at all, for all areas in the census of 2011 which were classified as small areas or sub places (both being census surveyed areas). The lowest density appears for illustration purposes.	
Environmental Management Department	Internal	Diagram 4b doesn't look right. Are there headings missing for each column?	MSDF	Minor changes to MSDF text.	Noted and corrected.	

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Environmental Management Department	Internal	Why does the map T-shirt t (diagram 4a) not match Map 4.1? Helderberg Nature Reserve and Hottentots Holland Nature Reserves (i.e. the entire area up to the boundary northeast of Somerset West) should all be green. Atlantis blue also doesn't correspond. There should be more green in the extreme north. This T-shirt is still using the old City boundary.	MSDF	No change required to MSDF.	The T-Shirt is the proof of concept that brought about the Spatial Transformation Areas (STA). This diagram is schematic as it was intended to be used for communication purposes and not to be used to assess compliance with the MSDF. The detailed delineation of the STA is found on Map 5d.	
Environmental Management Department	Internal	Critical Natural Assets table: Informants could be simplified to: Core 1 Protected and Conservation Areas Core 1 Critical Biodiversity Areas (CBA1a - CBA2) Core 2 Ecological Support Areas (ESAs) The types of Core 1 Protected are expanded on and explained in the 'Desired Spatial Outcomes...'	MSDF	Minor changes to MSDF text.	Noted and improved.	
Environmental Management Department	Internal	Note: there must be consistency in the definition and scope of Critical Natural Assets. Elsewhere Core 2 (ESAs) included	All	Minor amendment to MSDF Text.	Biodiversity added to definition.	
Environmental Management Department	Internal	Critical Natural Assets table under Informants: Maybe remove Driftsands NR	MSDF	Minor changes to MSDF text.	Accepted that Driftsands Nature Reserve has been invaded and lost for biodiversity protection.	
Environmental Management Department	Internal	Renewable Energy installations are NOT appropriate in CNAs, especially not inside nature reserves. This would be in conflict with NEMPAA Regulations. Core 1 and 2 should all be no-go areas for IPP.	MSDF	Minor changes to MSDF text.	Noted and corrected.	
Environmental Management Department	Internal	P18 - Why no ticks	MSDF	Minor changes to MSDF text.	Noted and corrected.	
Environmental Management Department	Internal	This is inviting development applicants to challenge the BioNet's accuracy by suggesting the City's incompetence. Remove the word 'accurately'.	MSDF	Minor changes to MSDF text.	Noted and corrected.	
Environmental Management Department	Internal	This is a different acronym to that listed at the start of the document. Use GIN or GINet consistently throughout.	All	Minor amendment to MSDF Text.	Noted and corrected in the Acronyms, terms and definitions	
Environmental Management Department	Internal	Other examples don't go into the detail of the Policy/Strategy subsection. Just list Environmental Strategy and CC Strategy here.	MSDF	Minor amendment to MSDF Text.	Noted and corrected.	
Environmental Management Department	Internal	Map 5f: This name is incorrect. Please only use Steenbras Nature Reserve. Kogelberg Nature Reserve is outside of CCT. Steenbras Nature Reserve is part of the Kogelberg Biosphere Reserve, which was designated for natural not cultural reasons. Steenbras Nature Reserve is not inside the core of the World Heritage Site; it is only in the WHS buffer zone.	MSDF	Minor changes to the map.	Heritage Branch are in agreement and the cultural landscape has been renamed as "Steenbras Dam/ Hottentots Holland Mountain Cultural Landscape". It is still included as a cultural landscape as it is considered to be an iconic backdrop.	
Environmental Management Department	Internal	Diagram 6.1 The Atlantis pink area must be removed. That erf has already been reserved for Biodiversity Management and is in process for proclamation as an extension to the Witzands Aquifer Nature Reserve. It is also outside the Urban Edge and in the Aquifer Recharge Protection Zone, and therefore inappropriate for human settlement.	MSDF	No change required to MSDF.	The National Department of Human Settlements are the technical and responsible owners of the Priority Human Settlements Housing Development Areas (PHSHDAs) which were gazetted and Council approved after a public participation process by the National Department. These are merely areas (not erven) identified at a metro scale. Within each of these areas consideration would be given to all informants when determining future housing projects at an erf/project level.	
Environmental Management Department	Internal	Diagram 6.1 Social Housing Restructuring Zone should not overlap Nature Reserves, especially not over recreational waterbodies (Reitvlei and Zandvlei).	MSDF	No change required to MSDF.	Collectively, through an MOU between the National Department of Human Settlements and local governments and further regulated by the Social Housing Regulatory Authority (SHRA) - The Social Housing Restructuring Zones are areas identified at a metro scale that has been gazetted. Within each of these areas consideration would be given to all informants when determining future housing projects at an erf/project level.	
Environmental Management Department	Internal	Map 6.2 The Strandfontein Node dot must be moved south of Baden Powell Drive. It is currently inside False Bay Nature Reserve. There also should not be any blue NDA north of Baden Powell and west of Strandfontein Road, as that is also inside False Bay Nature Reserve.	Cape Flats/ KMP	No change required to MSDF.	Map 6.2 of the MSDF is for illustration purposes at a Metro scale showing the reader where Local Spatial Development Frameworks are planned for. For detailed guidelines pertaining to the area, please refer to Sub-district 6: Strandfontein and Environs guidelines contained in the Cape Flats District Plan.	
Environmental Management Department	Internal	Section 2.2 Sewer Reticulation: This sentence does not correspond to what is shown on Map 6.5, or to what is actually happening on the ground.	MSDF	No change required to MSDF.	The narrative contained in the MSDF has been qualified by the Water and Sanitation department. Comments and suggestions has been forwarded to the relevant for it to be considered and incorporated in the current or annual review of the MSDF.	Water and Sanitation
Environmental Management Department	Internal	Bulk sewerage Then why is raw sewerage bypassing Athlone WWTW entirely and flowing through people's houses, contaminating the Black River Canal and Harbour? The narrative in the MSDF really should match that in the DSDF.	MSDF	No change required to MSDF.	The narrative contained in the MSDF has been qualified by the Water and Sanitation department. Comments and suggestions has been forwarded to the relevant for it to be considered and incorporated in the current or annual review of the MSDF.	Water and Sanitation
Environmental Management Department	Internal	These two are not the only or most urgent priority upgrades required across the City. Why is the 'rolling list of 20 pump stations' not included in the text here, explained or prioritised? Map 6.5 is very confusing.	MSDF	No change required to MSDF.	The 20 pump stations alluded to is still being assessed and confirmed by the Water and Sanitation departments. Once confirmed and made available, it will be included in the current or annual update of the MSDF or the Annual Infrastructure Planning & Delivery Framework Report.	Water and Sanitation

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Environmental Management Department	Internal	Surely there should be more than 2 on the list? What is the justification for these 2 specifically? All too often in this MSDF there is a lack of rationalisation and explanation, which sets the stage for lack of accountability.	MSDF	Minor change to MSDF text.	Paragraph has been updated. The MSDF team is not responsible for review of sector-specific policies and strategies even if it is absorbed, visualised or represented in the MSDF. The MSDF team also have only authority and mandate over some policies and strategies on metro level. The review of sector-specific policies and strategies are coordinated via the City's Policy & Strategy unit but is on the initiative and based on the mandates of the sector-specific line departments.	
Environmental Management Department	Internal	Why is wastewater capacity such a tiny insert? It is hard to believe that the majority of the Urban Area does not require any project implementation in the next 10 years. How can areas be green where WWTWs are failing? Why is there no red on the main Sewer Capacity map? Why is so much of the Urban Area not green, orange or red? If those areas have not been assessed, why not? Why isn't there a footnote explaining this? Why is the Sewer Capacity based on a 2018 report? Why are the infrastructure projects only shown as point locations? Are there no pipeline or canal projects? Why are the Mayoral Priority Projects not even mentioned in the MSDF? They should be shown on this map and described (highlighted!) in the text. Alignment between the IDP and SDF is a legal requirement under the Municipal Systems Act.	MSDF	Minor change to MSDF text.	Both the narrative and associated maps contained in the MSDF has been qualified by the Water and Sanitation department. Comments and suggestions has been forwarded to the relevant for it to be considered and incorporated in the current or annual review of the MSDF. In addition, various projects/initiatives are communicated through the respective District Implementation Plans. A footnote has been inserted.	Water and Sanitation
Environmental Management Department	Internal	Add NEMPAA. It must be clear that proclaimed protected areas are no-go areas for most development.	MSDF	Minor change to MSDF text.	Noted and corrected.	
Environmental Management Department	Internal	Why is there no mention of offset requirements for inside the Urban Edge?	MSDF	No change required to MSDF.	Table A2 contains policy P18.6 Implement the Bioregional Plan to assess the impact of urban development on critical biodiversity areas and endangered species. Chapter/ part 18 of the Bioregional Plan describes the off set options.	City of Cape Town Document Centre: Bioregional Plan (2015)
Environmental Management Department	Internal	Specify who makes this request. Also, 'request' is not the right word to use, because the mitigation hierarchy as per NEMA is not optional.	MSDF	Minor change to MSDF text.	Noted and corrected.	
Environmental Management Department	Internal	Where does 20-year period come from? The National Biodiversity Offset Guideline recommends a minimum 30-year commitment for mitigation and offsets. This will be carried through to the National Offset Policy.	MSDF	No change required to MSDF.	20 years is the normal cycle for the Land Use Model.	
Environmental Management Department	Internal	Policy 18.6 This should be all 'threatened species', not only Endangered species. Endangered is one IUCN category of threat of extinction, and is at lower risk than Critically Endangered.	MSDF	Minor amendment to MSDF text	Noted and corrected.	
Environmental Management Department	Internal	There are a couple of comments on the Terms and Definition...please refer to the pdf for full comments	All	Minor amendment to MSDF Text.	Noted and corrected.	
Environmental Management Department	Internal	Table C1: NEMPAA (not NEMPA) All NEMA Subsidiary Acts should be referred to in a consistent way. This must be called The National Environmental Management Protected Areas Act, Act 56 of 2003 (NEMPAA). Worth adding that NEMPAA Regulations place restrictions on activities that may occur in proclaimed protected areas. This applies to types of development.	MSDF	Minor amendment to MSDF Text.	Noted and corrected.	
Environmental Management Department	Internal	Table C3: Is this the current Directorate name?	MSDF	No change required to MSDF.	Sometime carry the name under which the policy was drafted	
Environmental Management Department	Internal	Please go through the full pdf for minor/ grammar corrections	MSDF	Minor amendment to MSDF Text.	Noted and corrected.	
Environmental Management Department	Internal	Diagram E2: This diagram misleadingly shows HS zones in undevelopable areas, including proclaimed Protected Areas (nature reserves), floodplains and river corridors, seaward of the Coastal Edge, aviation precautionary risk areas, Koeberg 5km safety zone, etc. This is irresponsible.	MSDF	No change required to MSDF.	The prioritised human settlement areas and proposed social housing restructuring zones (both Council Approved and Gazetted) reflect those areas where those targeted housing programmes should be prioritised, subject to the availability of suitably located land. The above zones do not negate the need for proper due diligence and statutory approvals, inclusive of environmental processes, to be undertaken. Any proposed changes to the delineations are to be effected by the custodian departments in Human Settlements.	Human Settlements
Environmental Management Department	Internal	There cannot be a Prioritised Human Settlement Area north of the existing Atlantis footprint (i.e. outside the Urban Edge), because the land is already reserved for and managed by Biodiversity Management, and in process for proclamation as an extension to Witzands Aquifer Nature Reserve.	MSDF	No change required to MSDF.	The prioritised human settlement areas are Council Approved and Gazetted. Any proposed changes to the delineations are to be effected by the custodian departments in Human Settlements. The areas are broad and intended to show general locational preference.	Human Settlements
Environmental Management Department	Internal	Map F3: Steenbras Nature Reserve should be grey. No one lives on the reserve. All medium and large nature reserves could be grey.	MSDF	Minor adjustment to MSDF maps.	Map used census small area information and not adjusted for alternative purposes. Nature Reserves layer will be overlaid to improve messaging.	

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Environmental Management Department	Internal	Should be Melkbos Conservation Corridor	MSDF	Adjustement of MSDF Text	Table F2 to be updated after UDE Report completion.	
Environmental Management Department	Internal	The MSDF must not make reference to individual staff members. This is unprofessional.	MSDF	Minor adjustment to MSDF Text.	Minor adjustment to MSDF Text.	
Environmental Management Department	Internal	Land already reserved for Biodiversity Management cannot be shown as a Priority HS and Housing Development Area. Remove the shading outside of the Atlantis Urban Edge	MSDF	Minor adjustment to MSDF Text.	Historical Human Settlement projects are completed localities and the Prioritised HS Areas are council approved and gazetted and show larger areas targeted. The HS project will follow due process prior to approval.	
Environmental Management Department	Internal	Proclaimed Nature Reserves such as Blaauwberg, Table Bay and Tygerberg Nature Reserves, must not be shown as available and/or prioritised for Human Settlement. The same applies to areas that are undevelopable for other reasons, such as noise risk. This creates an irresponsible, false expectation.	MSDF	No change required to MSDF.	Prioritised Human Settlement Areas are council approved and gazetted and show larger areas targeted. The HS project will follow due process prior to approval.	
Environmental Management Department	Internal	Please use matching symbols - this should be a square. Otherwise it can be confused with the (almost) identical orange shading for Residential Land Value.	MSDF	No change required to MSDF.	Map uses grid cells illustrating principles.	
Environmental Management Department	Internal	Why is there a Residential Land Value shown for some proclaimed Nature Reserves (e.g. False Bay and Sandvlei Nature Reserves)?	MSDF	No change required to MSDF maps.	Map uses grid cells illustrating principles. 4ha or 1 ha and it illustrates schematically rather than precisely.	
Environmental Management Department	Internal	The first two should be squares to match the symbol on the map.	MSDF	No change required to MSDF maps.	Map uses grid cells illustrating principles. 4ha or 1 ha and it illustrates schematically rather than precisely.	
Environmental Management Department	Internal	delete 'critical' here SANParks is written as one word km ² ... the 2 must be superscript Biodiversity Management Branch. BMB is in the Environmental Management Department.	MSDF	Minor adjustment to MSDF Text.	Noted and corrected.	
Environmental Management Department	Internal	Must say 'Protected Areas and conservation areas' - they have different legal statuses related or designated?	MSDF	Minor adjustment to MSDF Text.	Noted and corrected.	
Environmental Management Department	Internal	Heideberg and Steenbras Nature Reserves are City-owned and managed, and therefore not included in the core World Heritage Site, only in the buffer zone. Steenbras Nature Reserve is, however, inside the Kogelberg Biosphere Reserve. Biosphere Reserves Table Mountain and Cape Point are both in Table Mountain National Park.	MSDF	Minor adjustment to MSDF Text.	Minor adjustment to MSDF maps.	
Environmental Management Department	Internal	This should be in a different colour - the shades of green are all too similar. This map has very outdated coverage of nature reserve boundaries.. What do the list of examples given mean?	MSDF	Minor adjustment to MSDF Text.	The right hand side map comes from the Provincial Spatial Development Framework and cannot be updated by the City. The City will update a map of relevance.	
Environmental Management Department	Internal	These diagrams are not using the latest Protected Area layer, such that Core 1 Protected and Conserved Areas appear to be being targeted for growth. They also still show the old CCT boundary.	MSDF	Minor adjustment to MSDF Text.	Noted and updated.	
Environmental Management Department	Internal	Make sure to fix term and definitions in MSDF Volume 2 to align with suggestions made on Volume 1	All	Minor amendment to MSDF Text.	Noted and corrected.	
Environmental Management Department	Internal	Unnecessary to have both Ecological Services and Ecosystem Services. They are essentially the same thing. This is the preferred term and definition.	All	Minor amendment to MSDF Text.	Noted and updated.	
Environmental Management Department	Internal	Please delete the land ownership part of this sentence. We cannot meet national conservation targets with public land alone.	All	Minor amendment to MSDF Text.	Noted and updated.	
Environmental Management Department	Internal	The national targets are specific to each vegetation type. You cannot generalise for a geographic area.	All	Minor amendment to MSDF Text.	Noted and updated.	
Environmental Management Department	Internal	This is not a decision that can be made by a SDF. That is what the BioNet is for. Delete this entire bullet point.	All	Minor amendment to MSDF Text.	Noted and updated.	
Water and Sanitation	Internal	Amend sector description as indicated in the comments submitted	MSDF	Minor change to MSDF text or maps.	The updated narrative has been incorporated.	
Water and Sanitation	Internal	Amend infrastructure projects as indicated in the comments submitted	MSDF	Minor change to MSDF text or maps.	The updated narrative has been incorporated.	
Water and Sanitation	Internal	Amend refurbishments details as indicated in the comments given	MSDF	Minor change to MSDF text or maps.	The updated narrative has been incorporated.	

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Water and Sanitation	Internal	Amend Infrastructure expansion projects as indicated in the comments submitted	MSDF	Minor change to MSDF text or maps.	The updated narrative has been incorporated.	
Water and Sanitation	Internal	Amend liveable urban waterway programme section as per comments submitted	MSDF	Minor change to MSDF text or maps.	The updated narrative has been incorporated.	
Environmental Management Department	Internal	Replace the abbreviation GIN with GINet throughout.	All	Minor amendment to MSDF Text.	Noted and updated.	
Environmental Management Department	Internal	Suggest remove what is currently there, namely "An integrated public open space system that mitigates climate change and makes the city liveable and healthy" and replace with what is currently footnote 5 in the document, with slight amendment (see suggested wording in the comments submitted)	MSDF	Minor amendment to MSDF Text.	Noted and updated.	
Environmental Management Department	Internal	Page 22: 2.3 Other structuring elements reword as follows The city's contemporary urban structure is also influenced by: • natural and biophysical assets with associated destination places.	MSDF	Minor amendment to MSDF Text.	Noted and updated.	
Environmental Management Department	Internal	Page 22. Natural assets and destination places Suggest amending as follows: Notable structuring elements are Cape Town's natural and biophysical assets including its biodiversity, green open spaces, rivers and wetlands, and coastline, and destination places, developed over several centuries (Map 2a) which make the city a desirable place to live, work, study and engage in both the formal and informal economy (Map 2b). Many of these natural and biophysical assets are now also regarded as green infrastructure and recognised for the ecosystem services they provide. Certain parts of the coastline... □	MSDF	Minor amendment to MSDF Text.	Noted and updated.	
Environmental Management Department	Internal	The reference to Map 2a and what Map 2a reflects seems to be a disjuncture.	MSDF	Minor amendment to MSDF Text.	Checked.	
Environmental Management Department	Internal	As far as I'm aware, Kirstenbosch and Table Mountain National Park form part of the Cape Floristic Kingdom World Heritage site (which has a number of others parts forming it too). They are not separate World Heritage sites.	MSDF	Minor amendment to MSDF Text.	Noted and updated.	
Environmental Management Department	Internal	Map 2bWhat is showing as Agriculture (brown) is also including conservation areas (e.g. Table Mountain National Park). Perhaps need Agriculture and a separate --- Conservation (protected areas) designation for the map. Key and what is being depicted seems strange – are 'places of worship' visible at this scale/ why distinguish between 'residential' and 'sectional title units' at this scale? □	MSDF	No change required to MSDF except for addition in header of map.	This map is a reflection of the overall use categories as per the General Valuation Roll, not zoning. This is high-level land use and it shows high-level land use categories, and not land cover / topo details. There is no sense in trying to exclude / include certain things or re-categorise because the Valuation Department's overall use categories are an entire workflow on its own.	
Environmental Management Department	Internal	Page 14, footnote 2 as refers to Green Infrastructure Network: Suggest amend.	MSDF	Minor amendment to MSDF Text.	Noted and updated.	
Environmental Management Department	Internal	Map 2d Open space system and destination place a. Suggest this is called Green Infrastructure Network and destination places. b. In the key if possible, please include: Green Infrastructure Network (excluding corridors) c. I'm not sure if it is possible to include a footnote/ explainer regarding GINet in association with this map. Alternatively, to insert the paragraphs below into the text somewhere. If so, then the one suggested previously, repeated below, would be appropriate. □	MSDF	Minor changes to the map.	Please see footnote 6 which precedes map 2d. The title of the map has been improved as suggested. The fact that GINet corridors are excluded has been added as a note to the map legend.	
Environmental Management Department	Internal	City and public sector are committed to servicing, protecting, enhancing and extending Critical Natural Assets. Is servicing correct? Conserving perhaps?	MSDF	Minor amendment to MSDF text	Noted and corrected.	
Environmental Management Department	Internal	Ensuring ecological service provision is acknowledged, protected and enhanced to ensure a resilient urban form that can act as a buffer against the increasing climate risk and ensure that low carbon and green infrastructure are considered to meet service delivery requirements. Suggest rather use 'ecosystem service provision' □	MSDF	Minor amendment to MSDF text	Noted and corrected.	
Environmental Management Department	Internal	Page 65 a. Appropriately manage land development impacts on natural resources and critical biodiversity networks. Should this perhaps be 'Appropriately manage land development impacts on natural resources, green infrastructure and critical biodiversity networks. Policy 19 : 'Plan for, and mitigate, the impacts of urban development on water resources and encourage water-sensitive design responses.' No 'ficks' are included in the adjacent columns	MSDF	Minor amendment to MSDF text	Noted and corrected.	

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Environmental Management Department	Internal	Page 69: Avoiding the formalisation of informality especially for residential units located under the 1:100 year floodline Should this rather be 'located within'	MSDF	Minor amendment to MSDF text	Noted and corrected.	
Environmental Management Department	Internal	Page 70. Table Green Infrastructure Network (GINet) Mag 5g. Suggest the text for the table column 'Principle that applies when considering allocation of development rights' be amended Suggested text - see full comments on sharepoint	MSDF	No change to MSDF Maps or text.	Kept column as requirement to stipulate land use direction	
Environmental Management Department	Internal	a. Please use Green Infrastructure Network in the map title. b. In the key please add '(excluding corridors) : green infrastructure network (excluding corridors	MSDF	Minor amendment to MSDF text	Noted and corrected.	
Environmental Management Department	Internal	Table A1bFor GINet, should 'Key legislation apart from MSDF and District SDFs' – rather reflect the IDP, Environmental Strategy and Climate Change Strategy (as per the Development Directives Table on page 70), and not the MSDF and DSDF, as it currently done	MSDF	Minor amendment to MSDF text	Noted and corrected.	
Environmental Management Department	Internal	Page 134, 2.4 Appropriate manage land development impacts on natural resources such as Agricultures Areas of Significance and Critical Natural Assets. a. This is a different wording from that on page 65, namely "Appropriately manage land development impacts on natural resources and critical biodiversity networks", although the policy statements are the same. It was suggested (see point 12 above) that this perhaps be changed to 'Appropriately manage land development impacts on natural resources, green infrastructure and critical biodiversity networks.' □	MSDF	Minor amendment to MSDF text	Noted and corrected.	
Environmental Management Department	Internal	It would also be useful if map 5g (GINet map) could be referred to for the policy statements 18, 19, 20 and 21	MSDF	Minor amendment to MSDF text	Noted and improved.	
Environmental Management Department	Internal	Page 145, Table A5. Refer to comments 12 and 17 above regarding name of Sub-strategy 2.4. (See full comments for reference)	MSDF	Minor amendment to MSDF text	Noted and improved.	
Environmental Management Department	Internal	Page 151. Refer to comments 12 and 17 above regarding the name of Sub-strategy 2.4.	MSDF	Minor amendment to MSDF text	Noted and improved.	
Environmental Management Department	Internal	P18.3 Land development proposals and decision-making to consider biodiversity connectivity, protection and reinforcement of existing green infrastructure linkages where possible Suggest rewording as follows: P18.3 Land development proposals and decision-making to consider biodiversity connectivity, and protection and reinforcement of existing green infrastructure and linkages, where possible. □	MSDF	Minor amendment to MSDF text	Noted and improved.	
Environmental Management Department	Internal	P18.7 Support operational requirements of biodiversity areas to ensure their ongoing utility in green infrastructure networks. Not sure I understand the intent of P18.7 □	MSDF	Minor amendment to MSDF text	Noted and improved.	
Environmental Management Department	Internal	P20.11 Enhance coastal defences where needed using a green infrastructure principle. Suggest amend as follows: P20.11 Enhance coastal defences where needed using a green infrastructure approach, where appropriate.	MSDF	Minor amendment to MSDF text	Noted and improved.	
Environmental Management Department	Internal	Definitions: Ecological services This should rather be Ecosystem Services. The footnotes are also not reflecting. Could perhaps be included as per the definition for Ecosystem Services in Vol II, page 168. If Vol I definitions are shorter than Vol II, then suggest just remove the footnote references. □	MSDF	Minor amendment to MSDF Text.	Noted	
Environmental Management Department	Internal	Green Infrastructure Programme (GIP) A City programme whose purpose is the protection and enhancement of existing natural assets and the promotion of new green infrastructure (GI) assets, in order to underpin Cape Town's sustainability, enhance the city's living environment and improve its resilience to the effects of climate change	All	Minor amendment to MSDF Text.	Definitions updated from internal City specialists.	
Environmental Management Department	Internal	Suggest check the map title and the name of the figure for that map for all. Many are different. For example: Map 5g: Tourism considerations and Green Infrastructure, but on the actual map called Tourism Assets & Green Infrastructure Network	MSDF	Minor amendment to MSDF Text.	Noted and improved.	
Environmental Management Department	Internal	Page 75, Map title: should Aquifer Resource Protection Zone, not be included in the title, not just Aquifers.	MSDF	Minor amendment to MSDF Text.	Noted and improved.	

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Environmental Management Department	Internal	Green Infrastructure Network or GI Suggestions for these as follows: Green infrastructure (GI): Natural and semi-natural open spaces, natural ecological and 'engineered' ecological systems, with other environmental features, that integrate with the built environment, to provide a wide range of ecological, community and infrastructure services. GI provides ecosystem services and can be present on a continuum from large scale naturally functioning systems to small scale urban elements (e.g. trees or a bioswale within a development). GI can help assist with the amelioration of urban development impacts. GI assets ideally form an interconnected network within the urban environment. Green Infrastructure Network: The spatial component of the City's GIP, derived through the mapping of green open spaces (public and private and >1ha), based on ecosystem service provision, and the identification of corridor linkages. Note that blue spaces (e.g. rivers and wetlands) are included in the definition of 'green space'. The GINet was developed using an 'expert' system, considering typologically defined spaces and interrogating these based on predefined questions relating to ecosystem service provision. The areas identified contribute to ecological, social and infrastructural services. Corridors were defined based on best fit linkages to maintain or establish connectivity. The GINet is intended to be an informant to development, by highlighting the existing GI assets and/or attributes of a site, with a view to retaining these, and where opportunity or potential exists, to enhance them when a development occurs.	All	Minor amendment to MSDF Text.	Definitions updated from internal City specialists.	
Environmental Management Department	Internal	Page 16, diagram 1a: some text is left side blocks is obscured by right text boxes. Source City of Cape Town Climate Action Plan 2021	MSDF	Minor amendment to MSDF Text.	Noted and improved.	
Environmental Management Department	Internal	Page 71, Risk subtheme - Exclusion buffers: "Employ a precautionary approach to urban development within identified exclusion buffer - specifically where land uses include permanent and temporary residential, social facilities and open air recreational uses" In addition to a 'precautionary approach', should mention also not be made of 'within regulatory or permit conditions' - e.g. within some identified exclusion buffers (of e.g. a landfill) there should be no residential development, given health or other risks. □	MSDF	Minor amendment to MSDF Text.	Noted and improved.	
Environmental Management Department	Internal	Page 116: Spaansemaacht River Project and Prinskasteel River Project: why these have specifically been highlighted. Are 5 different projects taking place in the Sand River catchment - perhaps would be worth checking with the project manager (Alistair Lee in Catchment Stormwater and River Management) as to the correctness of the info provided, as work still underway with defining the scope. Perhaps might be better to put in generalities in the MSDF, rather than specifics? Also these projects are under the banner of the Liveable Urban Waterways programme	MSDF	No change required to MSDF.	The updated narrative contained included in the MSDF has been qualified by the Stormwater Management unit. Comments and suggestions has been forwarded to the relevant for it to be considered and incorporated.	Stormwater Management
Environmental Management Department	Internal	Page 117 3.4 Liveable Urban Waterways : One of these projects is pertaining to the Roscommon Road wetland rehabilitation of the remnant wetland adjacent to the Diep River canal. This includes rehabilitation of the canal, construction of a silt and litter trap and creation of a wetland park.....	MSDF	No change required to MSDF.	The updated narrative contained included in the MSDF has been qualified by the Stormwater Management unit. Comments and suggestions has been forwarded to the relevant for it to be considered and incorporated.	Stormwater Management
Environmental Management Department	Internal	The Roscommon Road wetland is proposed, but not yet commenced. Again, as per comment above, perhaps better to include general principles for the LUW, rather than one project specific? Suggest confirm with Andrew McDonald (Lead for LUW programme) in Catchment Stormwater and River Management.	MSDF	No change required to MSDF.	The updated narrative contained included in the MSDF has been qualified by the Stormwater Management unit. Comments and suggestions has been forwarded to the relevant for it to be considered and incorporated.	Stormwater Management
Environmental Management Department	Internal	Comments pertaining to smaller details on grammar and maps other errors cant be summarised here please refer to Original comments submitted for corrections and suggestions	MSDF	No change required to MSDF.	Noted	
Environmental & Heritage Management -Table Bay, Tygerberg]	Internal	MSDF Vol2: Table C2: See corrections under the National Heritage Resource Act (Refer to orinal comments submitted)		No change required to MSDF.	Will be updated in next round.	

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Subcouncil 3	Internal	Emanating from SC3 SDF Public Engagement, Ward 4 Committee Item 14/03/22 (as attached) and preceding Sub- Council Activities Day meetings, ongoing concerns were raised by residents and CBOs pertaining to the enforcement of Land Use and Building regulations. These include but are not limited to: a) Slow or lack of response to landuse contraventions from building inspectors b) Lack of response from landuse management to problem buildings and boarding houses c) Concerns pertaining to Development Planning Applications and allegations that plans are approved without following due process. Through the Sub-Council office, may we request a meeting be arranged with District management officials from both Land Use Management and Building Development Management to address these concerns with CBO representatives, Cllr Benadie and SC Chairperson?	Blaauwberg	No change required to MSDF.	Forwarded to Development Management Department.	Development Management
Environmental & Heritage Management -Table Bay, Tygerberg]	Internal	The consolidated spatial plan must clearly indicate the no-go areas for development, based on the open space areas for recreation, ecological corridors, watercourses, floodplains and wetlands, and biodiversity areas. These areas form the backbone of the City in terms of functioning resilience for climate change for flooding and heat island problems.	All	No change required to MSDF.	The no-go areas cannot all be indicated as many sub pockets will result after EIA processes and other constraints. The risk and the climate change maps, as well as others related to the flood lines are used in the application processes. NEMA and other processes will point towards no go areas. Policy statements can also be used in this regard.	
Environmental & Heritage Management -Table Bay, Tygerberg]	Internal	The nodes and corridors should be accurately spatially defined rather than just graphically / notionally imposed over certain areas where there are underlying open space systems, agricultural, heritage, or ecological resources that have to be conserved. Creates the wrong impression that anywhere within a corridor / node is appropriate for any type of development	All	No change required to MSDF.	These concepts cannot be spatially delineated. The STAs are the best which can be done. We have to trust the processes in place administered by the MBP-L and NEMA as those are anyway much more detailed and sufficiently allowing engagement of all technical specialist in the commenting and decision making process.	
Environmental & Heritage Management -Table Bay, Tygerberg]	Internal	If expansion over our agricultural land is included within the new urban edge lines, how is a more compact city with spatial transformation and increased spatial efficiency going to occur, if not directing new development to intensifying the areas already developed.	All	No change required to MSDF.	This is the dilemma of urban growth management and balancing land needs compared with pushing the densification agenda. The UDE report tries to explain methodology and logic and the NEMA, NEMA and MBP-L processes will have to provide the required details.	
Environmental & Heritage Management -Table Bay, Tygerberg]	Internal	The function of spatial plans is to direct where development should go, and also where it should not go, and what essential resources must be conserved and enhanced. This must be stated upfront.	All	No change required to MSDF.	Efforts have been made to explain that in the STAs and the associated table in Ch 4 and 5.	
Environmental & Heritage Management -Table Bay, Tygerberg]	Internal	EHMB has already outlined the other legislation with which SDFs are required to comply in our last comments. Please include reference to the relevant sections of legislation as per our last comments of Jan / Feb 2022: (WCLUPA, NEMA, NHRA, NEM:Biodiversity Act, etc.)	All	Minor changes to MSDF maps and text.	The Jan/Feb 2022 was considered again and changes were included in the updated version of the MSDF. The Areas of Agricultural Significance layer was reviewed and updated in association with the Provincial Department of Agriculture. The Biodiversity information was updated in association with the City's Biodiversity Management Branch (who also work with the Provincial Government counterpart). All heritage information was updated in association with City's Environmental and Heritage Resources Management Branch.	
Environmental & Heritage Management -Table Bay, Tygerberg]	Internal	The 'Open space system and destination place should more usefully be the "Open Space System and Ecological Corridors map" in terms of managing a comprehensive system of open spaces in a unified and integrated manner. This would include the watercourses and floodplains, and passive and active recreational open spaces. A hierarchy of open spaces could be identified which could be articulated in further detail in the District SDFs. A map of Destination places could be developed along with heritage assets and other natural assets. This map as an open space system is incomplete due to the omission of the watercourses, floodplains and ecological corridors associated with these.	MSDF	Minor changes to MSDF maps and text.	Water course, flood plains and ecological corridors appear on other maps such as Map 5a, b, c and e.	
Environmental & Heritage Management -Table Bay, Tygerberg]	Internal	The 'coastal high intensity use area' overruns the Table Mountain National Park and biodiversity network on Lions Head, Signal Hill, Table Mountain and Oudekraal areas outside the urban edge area.	MSDF	MSDF maps improved	Map 2d has been improved with a notation that the delineations are schematic and taken from the Coastal Framework.	
Environmental & Heritage Management -Table Bay, Tygerberg]	Internal	Provincial scenic routes are not legible on the map. There are hundreds of grey roads which are not provincial scenic routes	MSDF	MSDF maps improved	Map 2d has been improved by reflecting data which were available already on other, tourist maps. We have also modified the symbology so that hopefully the provincial scenic routes are more apparent. The grey roads are the standard road network.	

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Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	Coastal high intensity use areas obscure this the intention to indicate this area 'high intensity use'? There are other recreation areas within the TMNP that are also intensely used. Why only focus on coastal areas? What is the rationale? Constantia Nek, Cecilia Forest, Newlands Forest, Princess Vlei, Chapman's Peak, Tokai, are high intensity recreational areas but not indicated on the map. Equally other coastal areas, such as Hout Bay are high intensity recreational areas but not featured on the map. The conventions are not clearly displayed on the legend.	MSDF	MSDF maps improved with clarification notice	Coastal High Intensity Areas layer is a concept from the CESF (Coastal Economic & Spatial Framework), a draft document at this stage. The Coastal High Intensity Use Areas layer is shown on the map as a conceptual indication of these areas and taken from the draft Coastal Economic Spatial Framework. The legend has been adjusted to make this more clear.	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	The public transport map doesn't include other more flexible public transport options such as combi taxis, Taxi Stations, raxi routes, and the Golden Arrow Bus routes which complement the MyCiti and rail system and extend levels of accessibility.	MSDF	No change required to MSDF.	Acknowledge the shortfall in these maps, but based on the advise of the Urban Mobility Directorate these maps have to be used until the CIPT and IPTN are reviewed.	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	'Preservation and enhancement of natural assets of the City' is included as an imperative. This should be expanded to 'conservation and enhancement of the natural and cultural heritage assets of the City, including the open space system and ecological corridors of the City, which includes the Bionet, watercourses, floodplains, wetlands and passive and active recreation areas.	MSDF	Minor changes to MSDF text.	Noted and expanded accordingly, although examples were omitted as these are elaborated on in Chapters 4 and 5.	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	Given the location of most people in the metro south-east area, it will be important to provide job opportunities (office, retail, light industrial), closer to where most people live	MSDF	No change required to MSDF.	Noted. The DSDFs distribute the projected land use demand through the identification of potential new development areas at varying land use mixes and intensities. Sub-district development guidelines promote the development of employment-generating opportunities where appropriate across the city.	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	This map indicates proposed new office space within the City's open space system and ecological corridors and floodplains. This would not be appropriate, such as the proposed new development at the confluence of the Liesbeek River, the Black and Salt Rivers. This demand for office space located at the confluence of the Black and Liesbeek River, and Salt River, is not informed by the open space system, watercourses and floodplains that have to be conserved to ensure appropriate flood management in high rainfall events. This will likely exacerbate future flooding events and remove open space / recreational opportunities for communities in these areas. It will lessen the resilience of the City and its residents to environmental shocks of flooding and the heat island effect. This map needs to be informed by an open space system and ecological corridors map.	MSDF	Minor change to the MSDF text.	The demand estimates are aggregated and assigned to valuation zones which as used by the Valuation Department. The LUM does not provide a spatial or land use designation, but merely depicts the realities of how urban growth can expect to be distributed in catchments of similar identity. It is thus important to not misinterpret the LUM maps as providing land use policy guidance, which is the role of the DSDF spatial development plans and associated sub-district maps. A footnote will be added to this effect.	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	STA T-shirt: This diagram doesn't communicate the correct message about the need to conserve and enhance the natural and cultural assets of the City within the blue 'inner city' area, or to conserve high value agricultural land and landscapes around the City edge – shown in places inappropriately as 'incremental growth and consolidation areas', or as Discouraged Growth Areas (where with enough finance for bulk engineering, development will be permitted), where development within these high value agricultural / cultural and scenic landscape areas will sprawl over areas like the Hout Bay Disa River valley, the Bottelary Hills, De Grendel farmlands on the edge of the Tygerberg mountain and Stellenbosch winelands. Additional areas need to be shown as areas unsuitable for development, where the natural and cultural assets are valued as important for the character, attraction and functioning of the City. "Future proof and upscale blue" This wording on the T-shirt implies developing within the City's open space system and ecological corridors. This is not acceptable. The Urban Inner Core needs to be informed by, and articulated by, the underlying assets of the open space system and ecological corridors, eg. The Coast to coast Greenway which is based on the ecological corridors associated with various rivers and 'Vleis', recreation areas, and floodplains. The Urban Inner core gives the wrong message to developers that the City's open spaces and floodplains are available as 'spatial transformation areas', when the open space system of watercourses and floodplains, and recreation areas is part of the 'critical natural asset / open space systems and ecological corridors' layer.	MSDF	No change required to MSDF.	Noted	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	Not clear why 'urban and coastal development edges' should enhance 'spatial targeting areas' investment rationale. These edges are not suitable for further development.	MSDF	No change required to MSDF.	Development Edge results in more cumbersome applications processes if located outside the prescribed areas. Hence it targets and directs development.	

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Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	Must be careful not to obliterate the open space system and ecological corridors (including watercourses, floodplains, and recreational areas) within the urban inner core as these areas are essential to the functioning and quality of life for residents in high density living environments. This 'urban inner core' needs greater refinement and needs to be based on a finer level of detail, otherwise it will communicate the wrong message to developers that it's desirable to develop in the open space system and ecological corridors.	MSDF	No change required to MSDF.	Sub-district guidelines in the DSDF provide more clarity on protection and enhancement of public open spaces on neighbourhood level.	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	Conserve rather than 'preserve' and enhance the natural 'and heritage' assets of the City including unique agricultural areas, watercourses, and their floodplains and wetlands, biodiversity areas and coastal assets.	MSDF	Minor amendment to MSDF text	Noted and improved.	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	Rename the 'critical natural asset' layer to 'open space system and ecological corridors' - include in this layer the biodiversity areas, nature reserves, conservation areas, active and passive recreation areas, watercourses, floodplains and wetlands, coastal public property, zoned open space, and agricultural areas.	MSDF	No change required to MSDF.	The proposed change will be noted for the next review. Changing the narrative as proposed will result in a material change/ difference from what has been communicated with the public on this current draft.	Urban Planning & Design
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	The open space system and ecological corridors are not visible within the Table Bay District or Tygerberg district where the watercourses and floodplains of the Liesbeek historic watercourse, canalised Liesbeek, Black and Salt River, Elsiekraal and Vygekraal, must be shown, and the Bottellary and Kulis River and floodplains and wetlands must be clearly shown. Green Point Common open space and the Sea Point and Mouille Point Promenade must be shown as part of the open space system. The Wingfield biodiversity area has been omitted. Please see more continuous open space system and ecological corridors clearly shown in 2012, although also not adequate but much clearer than what is contained in the 2022 maps.	MSDF	No change required to MSDF.	MSDF uses GINet information as provided by Environmental Department as open space system. Similarly MSDF uses Bionet from Biodiversity Department exactly as received.	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	Agricultural areas are indicated as 'discouraged growth areas'. These are mostly valuable agricultural areas and should be indicated in positive terms, as an agricultural asset to be conserved and enhanced. These areas help to structure urban development.	MSDF	No change required to MSDF.	Understandable perspective. But the DGA is a key concept in the investment rationale.	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	No need to include 'critical natural asset' under the heading of 'spatial transformation areas'. These are not areas that require spatial transformation on the whole - they mostly require conservation and enhancing. This layer must be shown more clearly so as not to disappear into the blue of the Urban Inner Core. The open space system and ecological corridors layer must structure the urban inner core to enable opportunity for enhanced access to quality open space for recreational needs and visual amenity and contact with nature.	MSDF	No change required to MSDF.	Perspective noted but critical natural assets are key structuring elements and direct investment. It also requires investment for enhancement of tourism potential and for biodiversity protection.	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	Incremental Growth and Consolidation Areas should not include significant agricultural and biodiversity areas, eg. De Grendel farm, Bottellary Hills, Disa River smallholdings in Hout Bay.	MSDF	No change required to MSDF.	Perspective noted but the IGCA signals the long term urbanisation and development trends acknowledging that certain key critical resources will be protected as part of the large scheme once detailed studies and inputs are available from specialist studies generated through the EIA Processes. □	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	Open spaces of metropolitan significance such as the Green Point Common (erf 1056 Green Point) must not be included in the Urban Inner Core. This area is used by residents of the whole of Cape Town. This will give the wrong message that the open space system is not important to conserve for quality of life of the City's residents. High density developed areas such as Green and Sea Point with numerous blocks of apartments and very limited open space, other than the Sea Point Promenade, require high quality open space such as the Green Point Common for recreational purposes which are shared with the rest of Cape Town. The Coast to Coast Greenway (open space and floodplains located along the course of the M5 from Table Bay to False Bay) are a structuring element to future development, and an open space resource to adjacent communities for recreational needs. The Two Rivers Urban Park also needs to be included as part of the open space system as it used to be. Much of it falls within the 1:100 year floodplain. The areas shown in yellow as floodplains are not suitable for office / retail / residential development and should be avoided and conserved as part of the open space system and ecological corridors.	MSDF	No change required to MSDF.	Comment noted and best positioned within the District DSDF Scale. Green Point Common has recently obtained heritage status and remains a critical public open space within the district and city.	

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Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Amend Map 4.1 to be informed by an open space system with ecological corridors, informed also by the City's watercourses. The watercourses provide ecological corridors and continuous open spaces in many areas which should be used to inform the open space system and ecological corridors and linkages to the bionet. The floodplains should be avoided for development as they are hazardous for flooding. They are also useful for The watercourses provide ecological corridors and continuous open spaces in many areas which should be used to inform the open space system and ecological corridors and linkages to the bionet. The floodplains should be avoided for development as they are hazardous for flooding. They are also useful for	MSDF	MSDF text adjusted	Tables related to Map 4.1 adjusted.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Amend to 'restore (rather than create) the balance between urban development, food security and 'environmental protection' to 'environmental conservation'	MSDF	No change required to MSDP.	Proposal does not change the focus of the strategy.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Pg 62 Achieving carbon neutrality by 2050. Natural measures can also be used in addition to new technologies to clean up greenhouse gas emissions. Conserve and create carbon sinks by keeping areas of natural open space, watercourses, floodplains, wetlands, grassed areas, treed areas, recreation areas, planting trees and favouring soft landscaping rather than hard-surfacing.	MSDF	No change required to MSDP.	Noted	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Pg 62: Leveraging the natural environmental to support spatial justice, by improving access to cultural sites and heritage resources and enhancing access for all residents to a quality, safe, open space network that provides community, recreational and economic opportunities" This open space network must be shown spatially because it is being denuded by inappropriate development, and will be further compromised because it is not visible in the Urban Inner Core, where it is up for development.	MSDF	No change required to MSDP.	Refer to Maps 5b and 5g.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	P62: Amend wording 'protected' to 'conserved'. Add the following words onto the end of the paragraph: Ecological service provision is to be ensured by protecting watercourses, floodplains and wetlands and not building in these areas, which could damage the ecological functioning of these areas, and put communities at risk of flooding and environmental shocks. Development within watercourses and floodplains should not be encouraged as it will compromise the functioning of these systems, from a hydrological, ecological, aesthetic and recreational point of view.	MSDF	No change required to MSDP.	Prefer existing more condensed text.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	P62: Natural resources are only one component of the open space system that is legally required to be protected. 'Critical natural assets' is only one component of the legally required open space system and ecological corridors layer. Need to add recreational areas, other open spaces, such as agricultural areas, watercourses, wetlands and floodplains and linkages between these areas and biodiversity areas.	MSDF	No change required to MSDP.	Prefer existing more condensed text.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	This spatial strategy must find spatial expression and mapping of these elements to inform new development. "Maintaining and creating quality, safe places and open space systems and public spaces ..." Unless this statement is spatially expressed on the consolidated maps, it will not be implemented spatially by developers and land use planners. Not even the GIN (Green Infrastructure Network) fully gives spatial expression to the open space system and ecological corridors.	MSDF	No change required to MSDP.	The inclusion of the GINet was hugely criticized already, as it was seen as a constraint to development.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	2nd sentence SPLUMA, insert WCLUPA, NEMA and the City's...	MSDF	Minor changes to the text	Noted	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	2nd bullet point: Amend as follows: "biodiversity and marine protected areas, rivers, wetlands, floodplains, ecological corridors, and open spaces"	MSDF	Minor changes to the text	Noted	

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Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	Principle that applies when considering allocation of development rights: add the words in bold: “Careful management of development to avoid developing in high-floodrisk areas, such as watercourses and their floodplains and wetlands, to protect the environmental integrity and green infrastructure value of aquatic resources and to ensure that permitted development enhances the ecological functioning / habitat conservation, the aesthetics and character of the adjacent watercourses, floodplains and wetlands. “	MSDF	Minor changes to the text	Included as suggested	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	Legend: change ‘major rivers’ to ‘watercourses’ ‘watercourses’ are incorrectly called ‘major rivers’. Please amend to accord with the term ‘watercourses’ used in legislation and to be accurate. Many of these rivers are not major rivers in a local or global context.	MSDF	Minor changes to the map.	Thank you for your suggestions. Major rivers have been renamed as Rivers & streams and the definition for Rivers & streams has been expanded to include reference to the term ‘watercourses’ and the legislation associated.	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	Some watercourses have been omitted. Please refer to an accurate base map and insert omitted watercourses, eg. western side of 12 Apostles mountain range. Properties have been flooded in heavy rainfall events adjacent to the Blinkwater and Kasteelspoort Rivers (Camps Bay). Coastal flooding at Bakoven Bungalow Area, Camps Bay (Victoria Road), Bantry Bay, Rocklands (Three Anchor Bay) or The Strand in big storm surge events is not indicated.	MSDF	Minor changes to the map.	A more detailed river network has been added to Map 5b Biodiversity Network & Marine Protected Areas and to Map 5c Areas of Agricultural Significance & Aquifer Resource Protection Zones. Due to the scale, it is difficult to map all rivers and streams on MSDF maps. Fine-scale features are more visible on the DSDF maps which can include more detail at the district scale.	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	See original comments submitted for reference: Move urban edge line back to road to conserve the biodiversity and agricultural lands. The urban edge line has moved progressively towards the R27 road since 2012, and now is shown east of the R27. The lateral expansion of the urban area continually, will not help with the objectives of densifying the urban inner core.	MSDF	No change required to MSDF.	Noted, please refer to the UDE Report.	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	See original comments submitted for reference: Ecological support areas on the river corridors through Camps Bay to be included.	MSDF	Minor changes to the map.	A more detailed river network has been added to Map 5b Biodiversity Network & Marine Protected Areas and to Map 5c Areas of Agricultural Significance & Aquifer Resource Protection Zones. Due to the scale, it is difficult to map all rivers and streams on MSDF maps. Fine-scale features are more visible on the DSDF maps which can include more detail at the district scale.	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	See original comments submitted for reference:Two Rivers Urban Parks conservation areas and biodiversity must be shown properly using the baseline information for floodplains and conservation areas	MSDF	No change required to MSDF.	Two Rivers Urban Park is on the map but at this scale, is not visible as it is under the wetlands polygon at the same location. The DSDF maps display more detail at the district scale.	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	See original comments submitted for reference: Wingfield biodiversity not shown appropriately Map too blurry to be useful - as the EMF guidelines say, ‘garbage in - garbage out’.	MSDF	No change required to MSDF.	Wingfield is on Map 5b – the BioNet & MPA informant map – but it's difficult to show small/overlapping features clearly at the metro scale. The DSDF maps map more detail at the district scale.	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	See original comments submitted for reference: The biodiversity areas should be linked with river corridors and floodplains which are also ecological corridors; watercourses must be clearly shown on the maps and their associated ecological support areas / conservation areas. Use accurate baseline information.	MSDF	Minor changes to the map.	A more detailed river network has been added to Map 5b Biodiversity Network & Marine Protected Areas and to Map 5c Areas of Agricultural Significance & Aquifer Resource Protection Zones. Due to the scale, it is difficult to map all rivers and streams on MSDF maps. Fine-scale features are more visible on the DSDF maps which can include more detail at the district scale.	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	See original comments submitted for reference: Move the urban edge line back to the R27 road, instead of through the farmlands through de Grendel Farm area of agricultural significance.	Northern	No change required to MSDF.	Comment noted but the UDE amendment on De Grendel will be depicted by the NEMA, LUPA process and details specialists studies with extensive public participation.	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	Farms of agricultural significance - Bottelary Hills cultural landscapes will need protection by moving the urban edge line closer to existing urban development rather than in the farmlands.	MSDF	No change required to MSDF.	The Urban Development Edge line in this area was a processes of assessment of needs for the future expansion of Kraaifontein and Brackenfell. Department of Agriculture was involved throughout the process.	
Environmental & Heritage Management –Table Bay, Tygerberg)	Internal	See original comments submitted for reference: Area of agricultural significance erroneously shown as Incremental Growth & Consolidation Area – will lead to loss of cultural landscapes and biodiversity. Move the urban edge line back to the R27 road, instead of through the farmlands through de Grendel Farm area of agricultural significance and biodiversity area	MSDF	No change required to MSDF.	Refer to the separate Urban Development Edge report for arguments and reasoning. The line in this area is indicative and subject to specialists studies.	

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Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	See original comments submitted for reference: Farms of agricultural significance - Bottelary Hills cultural landscapes will need protection by moving the urban edge line closer to existing urban development rather than in the farmland. See cultural landscape map below for reference.	MSDF	No change required to MSDF.	Refer to the separate Urban Development Edge report for arguments and reasoning. The line in this area is indicative and subject to specialists studies.	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	See original comments submitted for reference: Open space systems and ecological corridors are the legal requirement for structuring open space in terms of WCLUPA - must clearly show the recreational open space areas, watercourse and floodplains, wetlands, ecological corridors, biodiversity areas, etc. on the Consolidated spatial plan concept. The Two Rivers Urban Park area is missing from the open space system, as is the open space along the Kromboom River. The area also has heritage significance and contains floodplains which are required for the City's resilience to flood events and the heat island effect.	MSDF	No change required to MSDF.	The Spatial Transformation Areas are conceptual zones showing the City's proposed long-term spatial plan. However, for each development application, all informant maps must be referred to and the relevant legislation will still apply. Two Rivers Urban Park is on the map 5d but due to the scale, is difficult to see as it is overlapped by other map features. Open space systems and ecological corridors are more visible on the DSDF maps which include more detail at the district scale.	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	See original comments submitted for reference: Wingfield biodiversity area has been omitted from the urban inner core. This area has biodiversity significance	MSDF	No change required to MSDF.	Wingfield is on Map 5b – the BioNet & MPA informant map. It is not on Map 5d – the Consolidated spatial plan concept map – as it is proposed as a New Development Area. The DSDF maps map more detail at the district scale and where core Critical Biodiversity Areas overlap with New Development Area, they are identified as a Site of Coincidence. Please also refer to the Terms & Definitions for an explanation of Sites of Coincidence. The Urban Inner Core is a conceptual zone where land use activities will be intensified. However, for each development application, all informant maps must be referred to and the relevant legislation will still apply.	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	See original comments submitted for reference: Kuilsriver and Bottelary river corridors, floodplains and ecological corridors have been omitted from the Consolidated Spatial plan concept Map. Please refer to the rivers and floodplains map and include accordingly. These areas are not suitable for development within the urban inner core.	MSDF	Minor changes to the maps.	The Spatial Transformation Areas are conceptual zones showing the City's proposed long-term spatial plan. However, for each development application, all informant maps must be referred to and the relevant legislation will still apply. A more detailed river network has been added to Map 5b Biodiversity Network & Marine Protected Areas and to Map 5c Areas of Agricultural Significance & Aquifer Resource Protection Zones. Due to the scale, it is difficult to see the corridors on MSDF maps and small features may be overlapped by other map features. Open space systems and ecological corridors are more visible on the DSDF maps which include more detail at the district scale.	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	See original comments submitted for reference: The Urban Inner Core shown in Blue must not extend over the Green Point Common open space recreation areas of metropolitan significance which have to be conserved for recreational purposes for the citizens of Cape Town, given the densification that is occurring, whereby people need quality open spaces for quality of life.	Table Bay	Clarification text added to UIC envisaged outcomes.	The Urban Inner Core is an area proposed for intensification of land uses but not necessarily wall-to-wall development. Development within this zone must still be carefully planned and intentions for each district are mapped out in more detail in the DSDFs. Some text added to explain the balanced yet optimisation approach in relation to public open space provision in the light of increased densities and land use diversity.	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	See original comments submitted for reference: The linear open space of the Sea Point Promenade must be shown in green as part of the open space system.	Table Bay	No change required to MSDF.	Forwarded to DSDF Teams.	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	See original comments submitted for reference: Please clearly show the watercourses and their floodplains. Please use accurate baseline information to ensure all the watercourses are visible.	MSDF	Minor changes to the maps.	For each development application, all informant maps must be referred to. A more detailed river network has been added to Map 5b Biodiversity Network & Marine Protected Areas and to Map 5c Areas of Agricultural Significance & Aquifer Resource Protection Zones. Due to the scale, it is difficult to see the watercourses on MSDF maps and small features may be overlapped by other map features. Please refer to the DSDF maps for more detail at the district scale.	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	Use the term Watercourses on the map rather than 'major river'	MSDF	Minor changes to the maps.	Thank you for your suggestions. Major rivers have been renamed as Rivers & streams on all of our informant maps and the definition for Rivers & streams has been expanded to include reference to the term 'watercourses'.	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	The firelines High Risk areas are a bit mixed up around the mountain. Please clarify. Map unclear with too many mixed up fire risk lines. A single line around the urban edge will suffice for high fire risk on the urban edge.	MSDF	MSDF Map 5e fire line to be adjusted	The fire risk lines in the mountainous areas have been amended. The boundary of the Urban Development Edge has been adopted as the fire risk line in these areas. The fire risk lines on the draft map came from the 2018 Council approved MSDF and was an input by TMNP and Work for Fire at the time. The mountainous fire risk lines were comprised of management tracks.	
Environmental & Heritage Management -Table Bay, Tygerberg)	Internal	Areas of informality Fire Risk is not shown in the same colour on the legend (brown) as on the map (red). Correct legend to match the map convention.	MSDF	No change required to MSDF.	It is in fact the same colour in the legend as on the map so an optical illusion.	

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Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	S31 Provincial Heritage Areas are not legible on the map in Bakoven, Glen Beach and Clifton Bungalow Areas.	MSDF	Minor changes to the map.	The layering order on the MSDF maps has been tweaked so that the Heritage Areas display better. Please also refer to the DSDF heritage maps which display more detail at the district scale.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Green Point Common is a proposed Provincial Heritage Site and must be included. There needs to be a convention for proposed Provincial Heritage Sites	MSDF	Minor changes to the map.	The new boundary has been added to the map and reflected its new status although its gazette is pending.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Development Focus Area and New development area shown in water courses and flood plains. Map very unclear. New development incorrectly shown in watercourses and floodplains. Please correct and omit New Development Areas and Development Focus Areas from floodplains and biodiversity areas. Not compliant with EMF Regulations or WCLUPA requirements. Watercourses and floodplains and floodprone areas are not appropriate areas for P23.1 'supporting ... higher-density residential development'. This would not be in line with a resilient City.	MSDF	No change required to MSDF.	While NDAs and DFAs have been identified for development of various kinds, each development proposal would be subject to the usual processes to determine whether the planned development is suitable for the site and to determine its final building footprint. This diagram is designed to give a high-level overview of various spatial components but as indicated in the diagram, it is necessary to refer to the DSDFs for localised context and detail.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Urban Structuring elements include the open space system and ecological corridors. This layer has been omitted. Not only roads and railways structure an urban area. Open space system and ecological corridors have been omitted leaving an incomplete 'urban structuring elements' map. Urban areas are structured by more elements than roads and railways alone.	MSDF	No change required to MSDF.	While Development Focus Areas and New Development Areas have been identified for development of various kinds, each development proposal would be subject to the usual processes to determine whether the planned development is suitable for the site and to determine its final building footprint. This diagram is designed to give a high-level overview of various spatial components but as indicated in the diagram, it is necessary to refer to the DSDFs for localised context and detail.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	P25.8 states' Increase residential supply through the development of mixed income, diversified tenure and higherdensity housing in the Urban Inner Core, within New Development Areas (JNDAs) and Development Focus Areas (DFAs) identified in the District SDFs. This is problematic if the Urban Inner Core fails to identify the open space system and ecological corridors, so that higher density housing could be proposed in recreational areas, watercourses, floodplains, biodiversity areas, etc. The urban inner core does not include a clearly defined open space system and ecological corridors. It must be more carefully articulated. Housing in floodplains and within the open space system, would not comply with the EMF regulations and WCLUPA requirements.	MSDF	Minor amendment to MSDF text	Policy 25 and 25.8 adjusted.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Captions to figures (maps/images/diagrams etc) should be below the image and not on top.	MSDF	No change required to MSDF.	The advice of the communication department will be taken in this regard.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	The length of the document is quite long. Perhaps an abridged version of the document could be made available for use to general public.	MSDF	No change required to MSDF.	Executive summary is available (4 pages) and will be slightly expanded for public use.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	The Employment Density Map requires more location specific data.	MSDF	No change required to MSDF.	This map is the only information available and the simplicity	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	The map requires location specific annotations.	MSDF	Minor changes to the map.	The maps have been improved by adding location labels.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	The legend is missing the thematic colour schemes.	MSDF	Minor changes to the map.	This map has been replaced with a better map that includes the thematic colour schemes.	

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Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Can the 'Destination Places' be labelled?	MSDF	Minor changes to the map.	The maps have been improved by adding location labels.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Can these two maps have their own dedicated pages?	MSDF	Minor amendment to MSDF layout	Thank you for the suggestion. Map 2e and 2f now have their own dedicated pages.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Can these four maps have their own dedicated pages?	MSDF	Minor amendment to MSDF layout	The aim of these maps is to give a very high-level impression of the information only in the form of an illustration of the text.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Map should also include coastal flood risk areas.	MSDF	No change required to MSDF.	The City of Cape Town Coastal Management Branch was consulted and they advised that the Coastal Risk Areas dataset is not accurate enough for this purpose and too readily misinterpreted. Indications of a historical sea level rise research project reflects on the Climate Change map.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Would it be possible to label the major rivers outlined on the map?	MSDF	No change required to MSDF.	The MSDF maps are designed to give an overall impression of the map features at the metro scale. At this scale, major river labels on Map 5b proved to be distracting and thus have been excluded. Refer to the DSDF maps for district scale detail.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Would it be possible to label the major rivers and aquifers outlined on the map?	MSDF	No change required to MSDF.	The MSDF maps are designed to give an overall impression of the map features at the metro scale. At this scale, major river labels on Map 5b proved to be distracting and thus have been excluded. Refer to the DSDF maps for district scale detail.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Why is only the Table Mountain National Park the only conservation area mentioned?	MSDF	Minor changes to the map.	Table Mountain National Park has now been given the same symbology as the rest of the GiNet and a note in the legend explains that is a "non-evaluated component of the GiNet". These maps are to showcase the GiNet extent with the protected & conservation areas featuring on MSDF Map 5b.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Can each map have its own dedicated page?	MSDF	No change required to MSDF.	These conceptual maps form part of a composite diagram that invites the reader to make comparisons between them at a very high level. They have therefore been kept together on one page.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Can this map have its own dedicated page?	MSDF	No change required to MSDF.	This diagram is only available at this size.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	Can this map have its own dedicated page?	MSDF	No change required to MSDF.	The aim of this map is to give a very high-level impression of the information only in the form of an illustration of the text.	
Environmental & Heritage Management --Table Bay, Tygerberg)	Internal	DFA definition: This definition is accepted as long as DFAs do not include watercourses, their floodplains and wetlands, and the open space system and ecological corridors of the City. The Urban Inner Core is currently unarticulated, so that NOT all areas within the Urban Inner Core are appropriate	All	Minor amendment to MSDF Text.	Updated	
Development Management	Internal	Page ix: "CTZS Cape Town Zoning Scheme" can be removed.	MSDF	Minor amendment to MSDF Text.	Updated	
Development Management	Internal	Page ix: "EGS Economic Growth Strategy" should be "IEGS" Inclusive Economic Growth Strategy".	MSDF	Minor amendment to MSDF Text.	Updated	
Development Management	Internal	Page 50: DGA's: Column 1: Will AG and RU zonings within the DGA's be assisted by the City, but any other zonings not?	MSDF	Minor amendment to MSDF text	DGA Table 4.3 adjusted.	

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Development Management	Internal	Page 57: DGA's: 4 th row, Point 2: The bullets listed must align with the uses permitted in the DMS, otherwise it can only be temporary departures.	MSDF	No change required to MSDF.	These uses were identified by LUPA and Rural Land Use Guidelines and supported by the Approved PSDF. Based on internal discussions, it was agreed to review a range of uses within rural and agriculture zoning to support agriculture and tourism sector - accepting that some will only be approve as temporary departures.	
Development Management	Internal	Page 58: DGA's: Preliminary conditions for applications and processes	MSDF	Minor amendment to MSDF text	DGA Table 4.3 adjusted.	
Development Management	Internal	Application processes cannot be prescribed here, it is contained in the MPBL.	MSDF	Minor amendment to MSDF text	DGA Table 4.3 adjusted.	
Development Management	Internal	Point 1: Meaning site-specific deviation?	MSDF	Minor amendment to MSDF text	DGA Table 4.3 adjusted.	
Development Management	Internal	Point 4: Do not need to mention, all applications must be subjected to the MPBL s99 criteria.	MSDF	Minor amendment to MSDF text	DGA Table 4.3 adjusted.	
Development Management	Internal	Point 5: Can only be prescribed as a requirements in terms of the MPBL.	MSDF	Minor amendment to MSDF text	DGA Table 4.3 adjusted.	
Development Management	Internal	Point 11: Approval conditions cannot be prescribed here.	MSDF	Minor amendment to MSDF text	DGA Table 4.3 adjusted.	
Development Management	Internal	"No investment from City and the public sector." Comment: This need clarification as the City has hugely invested in bulk and other infrastructure in the DSG. It is accepted that this relates to investment in infrastructure to support urban growth within the DSG.	MSDF	Minor amendment to MSDF text	DGA Table 4.3 adjusted. The investment in bulk engineering services, even though located in the DGA will most probably support urban development in areas as determined for future development and highlighted in the sector plan, master plans for the specific engineering sector. Those plans are generally based on inputs from the Land Use Model and based on the MSDF & DSDFs. It is unlikely that capacity in services infrastructure will be added to accommodate development outside the City's areas earmarked for future development in the next 5-10 years.	
Development Management	Internal	Delete Operational Costs: "Land uses beyond the UDE, which would ordinarily be accommodated within the existing built footprint and public transport infrastructure, will be subject to spatially differentiated operational and capital costs for bulk, link and network engineering infrastructure as per the MPBL-L, if applied for in the DGA."	MSDF	Minor amendment to MSDF text	DGA Table 4.3 adjusted.	
Development Management	Internal	Delete Operational Costs: "The developer will carry all costs related to the provision of all required bulk, link and reticulation engineering infrastructure services (both capital and operating costs) as contemplated in the MPBL-L Section 65, and agreements will be stipulated in the conditions of approval."	MSDF	Minor amendment to MSDF text	DGA Table 4.3 adjusted.	
Development Management	Internal	Comment: I fully accept and support that the City of Cape Town should not provide bulk services and the developer must stand in for all costs as per sections 65(3) and (5) of the MPBL. It has been many times advise that this should not include operational costs as it is unworkable and should render a development proposal undesirable. An application should then be refused as imposing unenforceable, unreasonable and inappropriate conditions makes no sense. I do find it problematic that this provision still appears in the draft after what has been commented on for many years.	MSDF	Minor amendment to MSDF text	DGA Table 4.3 adjusted.	
Development Management	Internal	You cannot prescribe to the decision maker and this provision should preferably be removed. "Should the decision-making authority grant rights, developers must comply with the following provisions which will be in the conditions of approval: • The public sector will not invest or utilise any grant funding. These conditions should be approved in accordance with MPBL-L Section 100 (2). • Spatially differentiated tariffs via the MSA's Internal Municipal Services Districts (IMSDs), may apply. "	MSDF	Minor amendment to MSDF text	DGA Table 4.3 adjusted.	
Development Management	Internal	□ The public sector will not invest or utilise any grant funding. These conditions should be approved in accordance with MPBL-L Section 100 (2). Comment: You cannot prescribe to the decision maker and this provision should preferably be removed.	MSDF	Minor amendment to MSDF text	DGA Table 4.3 adjusted.	
Development Management	Internal	In general I do find these "preliminary" conditions to be part of an MSDF inappropriate and misplaced. Provisions should be generic and dealing with principles and not specifics. A DSG overlay zone can also provide more in this space as recommended in the MSDF page 103.	MSDF	Minor amendment to MSDF text	DGA Table 4.3 adjusted.	
Development Management	Internal	Page 85: Citywide incremental densification: Density Guideline: Clarification required on "external departure".	MSDF	Minor amendment to MSDF text	Adjustments made	
Development Management	Internal	Page 125: Might have missed it, but can the document list any required new policies?	MSDF	Minor amendment to MSDF text	Policies to be reviewed expanded in Implementation Chapter 6.	

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Development Management	Internal	"Areas beyond the Urban Development Edge (Map 5d)" This list seems to exclude a site specific circumstances motivation beyond the edge, that means any land use development. In my opinion this is a overkill and needs to be reworked.	MSDF	Minor amendment to MSDF text	Adjustements made to Table A1a and A1b	
Development Management	Internal	Definitions to align with the MPBL and DMS definition, where applicable. E.g. Floor factor.	MSDF	Minor amendment to MSDF text	Abbreviations and definitions document updated into single document for MSDF and DSDF.	
Stellenbosch Municipality	External	The DSDF in its current format has not considered the Stellenbosch municipal context (including Stellenbosch SDF, heritage inventory, high potential agricultural areas, and biodiversity areas) and we urge you to incorporate these aspects in your report(s)	Helderberg	Minor amendment to MSDF text and maps.	After further discussions with the Western Cape Department of Agriculture the delineation around the boundary between the City and Stellenbosch municipality has been re-agreed and some corrections have been made.	
Stellenbosch Municipality	External	The areas adjacent to the Stellenbosch Municipal boundary under review are specifically sub-district 1 (Macassar/Vergenoeg) and portions of sub-district 5 (Somerset West - Faure). It is important to note in these areas the cultural, historical, and agricultural sensitivity of the areas, and accordingly, these interfaces need to be specifically addressed in the spatial framework and mitigating and spatial proposals should be sensitive to this	Helderberg	Minor amendment to MSDF text and maps.	After further discussions with the Western Cape Department of Agriculture the delineation around the boundary between the City and Stellenbosch municipality has been re-agreed and some corrections have been made.	
Stellenbosch Municipality	External	include a buffer of at least 10km at the interface/edge of the maps specifically dealing with agricultural areas of significance and heritage resources	Helderberg	Minor amendment to MSDF text and maps.	After further discussions with the Western Cape Department of Agriculture the delineation around the boundary between the City and Stellenbosch municipality has been re-agreed and some corrections have been made.	
Stellenbosch Municipality	External	almost 80% of the Stellenbosch municipal area falls under high potential agricultural and biodiversity areas. These green belts / green transition zones are important from a regional perspective for food security, recreational planning (including tourism), conservation and preservation. These green transition zones aim to: • Preserve the rural landscape of Stellenbosch as a significant cultural landscape within the context of the Western Cape; • Maintain a clear distinction between urban and rural on the municipal boundary; • Prevent pressure from the City of Cape Town to extend the urban edge into the significant cultural landscape of Stellenbosch.	Helderberg	Minor amendment to MSDF text and maps.	After further discussions with the Western Cape Department of Agriculture the delineation around the boundary between the City and Stellenbosch municipality has been re-agreed and some corrections have been made.	
Stellenbosch Municipality	External	the municipality supports the statements in volume 1 of the report namely -- agricultural land should be preserved and utilized for food security and urban intrusions should be prevented and no further subdivision of agricultural land should be permitted. The land use model yields (2020 – 2040), also substantiated in volume 2 that there is currently no need to expand the urban footprint beyond the proposed edges (p.9). Based on this, as well as the images below the readjustment of municipal boundaries are not supported.	Helderberg	Minor amendment to MSDF text and maps.	After further discussions with the Western Cape Department of Agriculture the delineation around the boundary between the City and Stellenbosch municipality has been re-agreed and some corrections have been made.	
Stellenbosch Municipality	External	Furthermore, the sensitivity to any future (re)development along the scenic drive (Baden Powell) is acknowledged and in order to align/coordinated the vision it is requested that the municipality share the Scenic drive network management plans (Vol. 3 of 2003 and the draft 2013).	Helderberg	MSDF UDE has been reduced and adjusted	These documents are available at Spatial Planning but need to be updated and is included in the list in the implementation chapter.	
Stellenbosch Municipality	External	The areas adjacent to the Stellenbosch Municipal boundary under review are specifically sub-district 10 (Penhill and surrounds). It is important to note in these areas the cultural, historical, and agricultural sensitivity of the areas, and accordingly, these interfaces need to be specifically addressed in the spatial framework and mitigating and spatial proposals should be sensitive to this. The DSDF in its current format has not considered the Stellenbosch municipal context (including Stellenbosch SDF, heritage inventory, high potential agricultural areas, and biodiversity areas) and we urge you to incorporate these aspects in your report(s).	KMP	MSDF UDE has been reduced and adjusted	Forwarded to DSDF Teams. The Jacobsdal development will take shape through detailed processes of NEMA, LUPA and the required specialists studies.	
Stellenbosch Municipality	External	We suggest that you include a buffer of at least 10km at the interface/edge of the maps specifically dealing with agricultural areas of significance and heritage resources. (See original submitted comments for screen shots)	KMP	MSDF UDE has been reduced and adjusted	Forwarded to DSDF Teams. The Jacobsdal development will take shape through detailed processes of NEMA, LUPA and the required specialists studies.	
Stellenbosch Municipality	External	• Contrary to the above, the development guidelines for the management of the environmental resources address the agricultural areas of significance (p.41), particularly in the Kuisrivier (Zevenwacht) area. The statements numbered 1 – 5 in the table are supported and should be translated accordingly into the maps.	KMP	No change required to MSDF.	Forwarded to DSDF Teams.	

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Stellenbosch Municipality	External	almost 80% of the Stellenbosch municipal area falls under high potential agricultural and biodiversity areas. These green belts / green transition zones are important from a regional perspective for food security, recreational planning (including tourism), conservation and preservation. These green transition zones aim to: • Preserve the rural landscape of Stellenbosch as a significant cultural landscape within the context of the Western Cape; • Maintain a clear distinction between urban and rural on the municipal boundary; • Prevent pressure from the City of Cape Town to extend the urban edge into the significant cultural landscape of Stellenbosch. □	KMP	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	• The table on page 42 and the heading "cultural and heritage zone" should incorporate the Bottelary/Kuilsrivier cultural landscape development guidelines (as noted earlier in the report), as well as the scenic routes (Baden Powell and Polkadraai). Ensure alignment with the Tygerberg DSDF & Helderberg DSDF around these cross-boundary aspects	KMP	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	In volume 1 of the reports, the following is noted and further clarity is required. • State of the Environment [1.3.3]: - o In section 3.1.1.3 it is stated that the district does not contain soil of high agricultural potential. Based on the screenshots below, this statement needs to be rectified as it also does not reflect what is shown in the MSDF map (Agricultural areas of significance). - o A similar statement is made in section 3.1.6.1. - o The green infrastructure map is not included (3.1.8). - o The cultural landscape (Bottelary/Kuilsrivier) as depicted on the MSDF Heritage Resources map and figure 3.4 is not described/explained in the report. - o Due to the abovementioned omissions it also doesn't get translated into the environmental spatial implications and should be addressed in the same manner as in the Helderberg DSDF which is similar to Stellenbosch municipality's approach and accordingly supported, namely: □ Heritage & cultural landscape: • Avoid high-density residential development that is not in character with the rural landscape; and - • Ensure development proposals do not have a negative impact on neighbouring municipal planning. □ Mining & agriculture: • Preserve and utilize high-potential agricultural land and areas currently being used for agricultural purposes.	KMP	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	• State of the Built Environment: - o In section 3.6 it is stated that extensive farming is not currently being practiced on the Stellenbosch farms. Although there are some parts (closer to Zevenwacht mall) that appear to not be farmed, it should be noted that the rest of the farms (Farm 1540, Farm 417) are actively being used for vegetable farming and vineyards. Even though they are not actively farmed on the soil potential for agricultural activities is high and should be preserved.	KMP	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	In volume 2 of the report the spatial strategy (nr. 2), namely – managing urban growth and creating a balance between urban development, food security, and environmental protection is supported. However, this spatial strategy isn't translated into the spatial plan. The following areas are highlighted for further clarification: • The MSDF map which depicts the agricultural areas of significance isn't translated into the integrated concept (figure 8). These areas are omitted and the urban edge is proposed for expansion, contrary to spatial informants contained in the MSDF maps (including the screenshot of the consolidated spatial plan concept). □	KMP	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	• Figure 13's legend doesn't include the areas of unique agriculture and heritage category. It should also be noted that the urban edge doesn't follow the consolidation area of the MSDF and accordingly the new development area and mixed-use intensification outside of this urban edge are not supported based on the agricultural & heritage reasons discussed above.	KMP	No change required to MSDF.	Forwarded to DSDF Teams.	

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Stellenbosch Municipality	External	- Clarification is required as to which urban edge is proposed, p.113 (Vol 2) and pages 26, 33, and 51 show different urban edges. The following urban edges are not supported, namely - The one which follows the municipal boundary; and - The one which deviates (i.e. includes the new development & mixed use intensification areas) from the MSDF consolidation area.	KMP	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	The proposed new development & mixed use intensification areas in figure 24 is not supported based on the agriculture and heritage resources discussion as mentioned above. In addition, this proposal has not been discussed in the report on page 112. Further detail and clarification is requested	KMP	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	The sub-district that represents the eastern section of the urban footprint of the district, is characterised by mostly higher density, more affordable residential development (Fisantekraal, Wallacedene, Bloekombos), some smallholding areas (Botfontein, Kruisfontein, parts of Joostenbergvlakte), but also industrial areas, as well as vacant land, of which some portions are still farmed (horticulture). The Malmesbury rail line and Lucullus Road to be extended in future from the R312, forms the backbone of the area. Furthermore, the area is characterised by ongoing pressure for development outside the urban development edge, as well as, over the years, the intrusion of illegal uses, especially transport related uses:	Northern	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	The following key actions are proposed to facilitate the achievement of the spatial objectives through the spatial vision, the role of the district and the spatial concept: - Mixed-use node west and east of Botfontein Road to be considered to provide for the need for employment generation as well providing space for relocation of informal settlements within the Wallacedene & Bloekombos areas. - Protect agricultural land from urban expansion □	Northern	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	Guidelines Proposed: □ Encourage the development of employment-related uses to the west of Botfontein. □ Employment creation land uses may be considered for the smallholdings located west and east of Botfontein Road and north of the agricultural unit just north of Bottelary. □ Employment creation land uses may be considered for the smallholdings located west and east of Botfontein road and north of the agricultural unit just north of Bottelary. □ Any urban development will still be subject to Act 70 of 1970, but employment creation land use applications will be supported. A future mixed-use node is envisioned for the area. □ Such a mix-use node may be compared to the existing example of Brackengate, where smaller scale industrial related, service industrial, as well as commercial uses (offices) may be considered (as part of the primary component). Small scale retail (restaurant) may also be considered, as such uses contribute to the energy and quality of such areas. □ Wallacedene and Bloekombos represent the highest densities in the district, but in dire need of public facilities. □ Further industrial extension along Sandringham Road can be considered.	Northern	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	Stellenbosch Municipality supports the new development proposals on the western side of Botfontein Road, as well as the expansion of the Kraaifontein industrial area towards the south of the N1.	Northern	No change required to MSDF.	Forwarded to DSDF Teams.	

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Stellenbosch Municipality	External	The area is ideally located in terms of accessibility to both the R300 (access via on/off ramps approved) as well as the N1. The smallholdings (west and east of Boffontein Road) provide an opportunity for a future mixed-use node, inclusive of a portion for integrated human settlements (south of Wallacedene). For the land parcels west of Boffontein and the portions as identified to the east of the road (approximately 85ha), a development framework (as part of the package of plans approach) has to be developed for both sites by the developer, in order to address among others, elements of accessibility, the interface between agricultural areas, the transition towards the Bottellary River tributary to the south, bulk services requirements and spatial location of land uses such as for micro-enterprises and less formal economic activities. Land uses should be employment generators such as service industrial and commercial activities. These should support the creation of inclusive economic development so that marginalised communities would be able to access economic opportunities within emerging formal commercial and industrial nodes. The land identified for human settlement development to the south of Wallacedene (approximately 135ha), a development framework will also be required, to indicate inter alia measures to protect the agricultural land to the east (outside CoCT boundaries) from settlement encroachment.	Northern	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	The Northern District is an area that is defined by its diversity in terms of urban uses and densities, ranging from very low densities mainly north of the N1 freeway to higher densities south of the N1, a vast agricultural and rural hinterland, to be protected, and remote residential enclaves that is not linked to the urban footprint. Urban sprawl should be prevented in order to protect the vast agricultural hinterland	Northern	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	The key amendments since the 2012 DSP includes the proposed industrial and integrated human settlement inside the Urban Development Edge on the eastern side of Boffontein Road and the possible industrial expansion in Kraaifontein to the South of the N1.	Northern	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	Stellenbosch Municipality does not support the new proposal for industrial and human settlement areas as the agricultural properties to the east of Boffontein Road are regarded as high potential agricultural properties. Agricultural areas of significance are classified as high potential and unique agricultural land and include areas that have been ploughed for orchards, vineyards, forestry plantations, annual crops, pastures and irrigations lands. Intensive agricultural land shall be protected against conversion to other land uses, particularly urban development	Northern	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	The Northern district is faced with numerous challenges, inter alia the need to preserve the agricultural hinterland for agricultural production, the need to provide employment opportunities for especially lower-income environments, and also to provide for more integrated human settlements to accommodate the growing population. The existence of soils with low agricultural potential is not sufficient reason to consider allocating urban development rights. These properties need to be preserved and protected from urban expansion	Northern	No change required to MSDF.	Forwarded to DSDF Teams.	
Stellenbosch Municipality	External	This edge between Stellenbosch Municipality and CoCT is under immense pressure for urban development that, should it be allowed, will result in urban sprawl into the Stellenbosch Municipal area. It is therefore of the utmost importance that the Tygerberg DSPF take due cognisance of the Stellenbosch Municipal Spatial Development Framework (SM MSDF) as it includes objectives and strategies to preserve and protect the area along the boundary with the city against inappropriate development and with an aim to preserve the agricultural land for purposes of food security and the preserve and enhance the cultural landscape.	Tygerberg	UDE, AOAs & NDA layers were adjusted	Considerations was given to the submission and further discussions were held with Western Cape Department of Agriculture and the DSDF Team. Adjusted UDE and AOAs included in final copy of MSDF. Details studies are not available and the application processes via the EIA and MPB-L process will have to indicate locational specifics.	
Stellenbosch Municipality	External	Regarding the latter, it is brought to your attention that Stellenbosch Municipality prepared a Heritage Inventory for the municipal area which focussed primarily on the land outside of the urban and built-up areas and included all land up to the boundary with the CoCT. The Heritage Inventory was approved by Heritage Western Cape. The Inventory can be accessed online at www.stellenboschheritage.co.za .	Tygerberg	No change to MSDF Maps or text.	Awaiting GIS information from Stellenbosch Municipality regarding regional heritage and biodiversity information.	

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Stellenbosch Municipality	External	In terms of this inventory all land was divided into landscape units which units were analysed in terms of international agree principles and graded in terms of importance. The grading was done in terms of the system supported by the Heritage Act, 1999.	Tygerberg	No change to MSD/ Maps or text.	Noted.	
Stellenbosch Municipality	External	The Tygerberg DSD/ acknowledges the importance of the interface through making the statement that the demands for urban development and nature conservation must be balanced by containing the proposed urban growth using a constraint on the lateral urban expansion by means of an urban development edge. Key interventions proposed by the DSD/ are "the protection of the Zevenwacht agricultural areas and the linkages with the Bottelary Hills in adjacent Stellenbosch Municipality." However, neither the objective nor the strategies are achieved through the areas identified next to Zevenwacht in the vicinity of the Polkadraai Road nor in the area along the Bottelary Road near Haasendal where new medium density urban development is proposed on which is currently actively farmed small holdings. The development of the Polkadraai Small Holdings or the area next to Haasendal (Sub-district Map, Figure 23) fails, to create a balance between urban development, food security and environmental protection, will not assist in creating a healthy city and will reduce employment opportunities, specifically in the agricultural sector. We would therefore advocate for these areas to be included in the Spatial Transformation Areas 3 and 4 being Discouraged Growth Areas or Critical Natural Areas and thus not earmarked for urban development per se.	Tygerberg	No change required to MSD/.	Forwarded to DSD/ Teams. But Sub District Guidelines updated.	
Stellenbosch Municipality	External	The Tygerberg DSD/ acknowledges the environmental assets within its boundaries. According to the document the largest environmental asset is the Tygerberg Nature Reserve which should be protected and enhanced in terms of function and role. Other prominent environmental assets that should be protected include Bothasig NR, Cape Flats NR and Haasendal conservation area. The Symphony Way conservation area is in the process of being proclaimed as a Nature Reserve registered.	Tygerberg	No change required to MSD/.	Reflected on various Bionet maps	
Stellenbosch Municipality	External	Fundamentally the City of Cape Town should not be viewed in isolation and the role of the Greater Cape Metropolitan area, which includes the hinterland and more rural areas of Stellenbosch and Drakenstein, should be acknowledge and considered when looking at the function region. Should this point of departure be acknowledge, the environmental, - agricultural, cultural, - and recreation assets of the adjacent Stellenbosch and Drakenstein municipal areas would undoubtedly be seen as the most important assets, not only of Stellenbosch and Drakenstein, but also of Cape Town. In my view the DSD/ fails to acknowledge that the adjacent municipal areas are the single most critical area that should be preserved for food security, quality of its rural and cultural landscape, the huge role it fulfils as recreational are for the Cape Metropolitan area and its significant contribution to the agricultural and tourist economy and hence GDP of the Cape Metropolitan area. Certainly, the CoCT has a significant role to play to protect the above?	Tygerberg	Minor changes in maps and text.	The regional context is showed on most maps. A specific Technical Supplement exists on the regional context and detailed consultations have taken place the Stellenbosch Municipality.	
Stellenbosch Municipality	External	In this regard we support the proposals contained in the Spatial Planning Category of the areas of Agricultural Significance and Smallholdings and the Category for Cultural and Heritage Resources and Scenic Routes. Hence the objectives of the DSD/ to encourage the creation / provision of tourist attractions into high and medium potential agricultural areas and to ensure appropriate interfaces between the urban and rural hinterlands is fully supported as well as the objective to discourage further urban invasion, to ensure appropriate architectural character and to improve fire maintenance and safety is welcomed.	Tygerberg	No change required to MSD/.	Noted	
Stellenbosch Municipality	External	In our view, however the spatial proposals contained in Fig 23 does not acknowledge these objectives and will indeed encourage urban sprawl, degrade the character of the area, and decimate the agricultural reserves of the city further. The spatial proposals as contained in the sub-districts (map reference 15 and 16 on Fig 23) are therefore not supported	Tygerberg	No change required to MSD/.	Note that areas along Polkadraai, as well as Haasendal, was already included inside the 2012 urban edge. For the areas along Polkadraai, those applications are already in the process of consideration.	

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Private	External	Please refer to the Kraaifontein Sports Complex in line with the current incremental growth area	Northern	No change required to MSDP.	1. Firstly, the comment relates to privately owned land, earmarked in the District DSDP as " New Development Area", which may include sporting/ recreation facilities. 2. In order to acquire such land, the sporting body will need to liaise with Sport & Recreation Dept. (copied in Bradley Burger from that Department), who will need to assess the need for extending the sport complex, and will need to follow a property acquisition process (Council). 3. Such requirement cannot be dealt with/ is not the focus of the DSDP, i.e. acquisition of property and or making proposals for extending sport & recreation facilities, unless such requirement/ need has been motivated by the internal department/ directorate.	
Private	External	The Primary Road – Amadeus Drive serving both the “new” entrance to the Kraaifontein Sports Complex and the Sports Complex Shooting Range entrance needs to be included in any upgrading of this roadway or the Sports Complex itself.	Northern	No change required to MSDP.	The DSDP does not address accessibility to individual properties , that is not the focus of the DSDP	
Private	External	The importance of this Sports Complex to be a secure, safe public amenity for the community and new extended growth within this area is critical. Therefore easy controlled access on Amadeus Drive needs to be prioritized on the “planning” budget. i.e. Next 5 year integrated development plan	Northern	No change required to MSDP.	Forwarded to DSDP Teams.	
Headland Town Planners	External	Portions 37, 38, 39, 48 & 49 of Uitkyk Farm 468, Portions 6 & 7 of Blue Gum Grove Farm 468, Portion 1 of Jacobsdal Farm 1540 and Remainder Jacobsdal Farm 1540., Portion 2 of Farm 419. Based on agricultural potential studies and agreed by the department, most of the land is not significant (the area up to the 80m to 100m contour level, South to North) and has been analysed as non-viable for farming – ie it is no longer agriculturally significant. The rest of the land, ie the land “trapped” between that contour and the municipal boundary (which coincides with the ridgeline) should become a buffer between the risk of land invasions and the strengthening of productive agricultural holdings east of the city boundary – because the “abandonment” of the lower reaches of the farms create a risk of uncontrolled urban creep in the future. (c) The “trapped” land is also isolated from access unless linked to the WCG Welmoed project or through the “Jacobsdal” section to the north (just below the City reservoir). It therefore has no real sustainable value as a farming unit.	KMP	UDE, AOAs & NDA layers were adjusted	The UDE was amended to a notional line more or less between the 80m-100m contour in line with the DOA's view as communicated after the soil report (for the southern part closest to Penhill/ Welmoed housing project). For the more northern portions (on the curve of the Polkadraai Road) and surrounding the reservoir, another notional line was also indicated because of the absence of soil or visual impact studies to inform the precise locations of the AOAs or the UDE layers. To note also that, both DEADP, the DOA and Stellenbosch municipality objected to the 'buffer area' between the notional UDE and the municipal boundary to be pro-actively marked out for urban or industrial development. These authorities communicated the need for a non-urban buffer area and specifically that the visual impact assessments and other studies in the EIA will help to determine the ridge line protection conditions, the scenic route sight lines and other matters related to scale and form east of the notional UDE. The Areas of Agricultural Significance were kept in this location due to the fact that the EIA still need to produce a variety of specialists studies which will be used by the DOA and DEADP as decision making inputs in the LUPA, EIA and 70 of 70 legal processes.	
Headland Town Planners	External	The Municipal Reservoir site is indicated as an area of Agricultural Significance. This must be an anomaly and should rather be corrected.	KMP	UDE, AOAs & NDA layers were adjusted	Noted	
Headland Town Planners	External	The resolution with the Department of Agriculture needs to correlate into the shifting of the urban edge onto the municipal boundary, as the omission of this area leaves those 2 farmers in a vacuum, as half of their land is not viable agricultural land, and would be better suited to creating a buffer between the agricultural hinterland and the WCG Welmoed project. This principle was endorsed by the Department of Agriculture, as they are concerned in protecting the valuable agricultural hinterland, which lies east of the ridgeline, ergo in Stellenbosch municipal area.	KMP	UDE, AOAs & NDA layers were adjusted	Refer to response just a few lines above this entry on this table.	
Headland Town Planners	External	A consistency item: the Sub-District 10 map's urban edge is a different line the MSDP and the District SF map. All 3 versions on the mapping (figure 24 included, see further hereunder) show the agriculturally viable portion east and southeast of the reservoir as Mixed Use Intensification, which must be an error.	KMP	UDE, AOAs & NDA layers were adjusted	Refer to response just a few lines above this entry on this table.	
Headland Town Planners	External	Inconsistency between “Urban Restructuring and Upgrading” map and Sub-District 10 map (see extracts under 2. above): the one indicates agriculture, the other open space.	KMP	UDE, AOAs & NDA layers were adjusted	Refer to response just a few lines above this entry on this table.	
Headland Town Planners	External	The map on page 112 in Volume 2 (figure 24) is different to the Sub-district map provided as a separate JPG	KMP	No change required to MSDP.	Forwarded to DSDP Teams.	
Headland Town Planners	External	There seems to be no description in Volume 2 about the NDA indicated as “1” on the Sub-District map. This is useful in that it allows for a range of uses in the generic mixed use intensification classification, without being any more descriptive, and inadvertently “restrictive”.	KMP	No change required to MSDP.	Forwarded to DSDP Teams.	
Headland Town Planners	External	See original comments submitted for a number of suggestions to amendment	All	No change required to MSDP.	Forwarded to DSDP Teams.	

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Headland Town Planners	External	There is a lack of consistency across the draft district plans, this is evidenced by the structure of the different reports. Below are extracts taken from the Blaauwberg and Cape Flats district Volume 2 documents. Different structures and sections have been included. This creates confusion in working in different districts and applying the district plan documents appropriately. Consistency would be beneficial in allowing professionals and other interested parties to effectively engage and consult the documents when required	All	No change required to MSD.	Forwarded to DSDF Teams.	
Headland Town Planners	External	The Blaauwberg Draft District Plan makes reference to a 'conservation and biodiversity map' (see page 41 Blaauwberg DSDF EMF Vol 2 2022 document), while the Cape Flats Draft District Plan makes reference to 'green infrastructure and biodiversity' (see page 51 of the Cape Flats IDSDF EMF Volume 2). A consistent approach to data would be useful.	All	No change required to MSD.	Forwarded to DSDF Teams.	
Headland Town Planners	External	Figure 6, an extract from the Cape Flats District SDF Map, indicates an area that is identified as 'structuring open space,' while in figure 7 the same area is identified for 'potential industrial development' and 'mixed use,' with no mention of open space. This misalignment creates confusion in identifying the development priorities for the area and creates uncertainty for development in the area.	Cape Flats	No change required to MSD.	Forwarded to DSDF Teams.	
Headland Town Planners	External	Cape Flats draft sub-district 2 map, an area which is identified for mixed use intensification in the Cape Flats SDF overall map is not indicated as such in the sub-district map. Similarly, the cemetery located south of Klipfontein Road is indicated as such on the sub-district 2 map, but not in the overall Cape Flats Draft SDF map. There is also misalignment between areas of 'existing urban development,' as shown on the sub-district versus overall map	Cape Flats	No change required to MSD.	Forwarded to DSDF Teams.	
Headland Town Planners	External	In terms of very specific sites that are indicated on the "Structuring Open Space" maps, we still have reservations as to the efficacy of these maps, given the clear errors contained therein, in so far as they ignore conditions and/or approvals on the ground. Please note that the text in the district plans elevates these green spaces to "categories that may require deviation"; therefore it is absolutely critical that the data is correct, given that there are too many self-evident mis-categorisations in the mapping:	Cape Flats	No change required to MSD.	Forwarded to DSDF Teams. Refer to GINet use as information source only in Table A1 of the MSD Technical Supplement A, only for information and in process of verification.	
Headland Town Planners	External	Cape Flats: Sub-district 4: The green should be urban development in recognition of entrenched rights	Cape Flats	No change required to MSD.	Forwarded to DSDF Teams.	
Headland Town Planners	External	Southern: Sub-district 2: High Constantia Shopping centre and surrounds: Erven 2133, 2134, 2136, 1063, 9548, 12966 and 13898 must all be coloured in as "urban development" not green space, as 5 of them are zoned SR1, and 2 are commercial (general and local business).	Southern	No change required to MSD.	Forwarded to DSDF Teams.	
Headland Town Planners	External	Khayelitsha: Sub-district 8: erf 3728, to be shown in dark grey as it has urban land use rights, and is therefore not green space.	KMP	No change required to MSD.	Forwarded to DSDF Teams.	
Headland Town Planners	External	Northern: Sub-district 3 This SANRAL reserve no longer exists (the green rectangle); green to be changed to orange (portions 12/222 and 47/222, 84&5/222)	Northern	No change required to MSD.	Forwarded to DSDF Teams.	
Headland Town Planners	External	Cape Flats: Sub-district 4: The area north of Morgenster should become mixed use intensification, per a 23 August 2022 MPT decision (for portions 11, 38 and 43 of farm 807), and its associated EA.	Cape Flats	No change required to MSD.	Forwarded to DSDF Teams.	
Headland Town Planners	External	Tygerberg: Sub-district 6: NDA 12 should be shaded in as potential medium density residential, and the text referring to the history of bio-diversity offset should be removed, as this is an irrelevant historical footnote in the spatial plan. The site has been approved in January 2022 for a large Human Settlements project	Tygerberg	No change required to MSD.	The Biodiversity Network on the MSD Biodiversity Network & Marine Protected Area map 5b and used in the related DSDF maps is timestamped June 2021. It does not reflect all land use changes that have occurred since June 2021. In this case, although development is approved, the extent of remnant vegetation does not yet display on the latest available aerial imagery and editing has not been possible. It is always necessary to contact the Biodiversity Management Branch for the latest information available and for a biodiversity specialist to conduct a site visit in case the legislation still applies. The history of the offset is considered important as a guide as to how to improve processes in future.	
Headland Town Planners	External	Southern: Sub-district 4: For NDA 10, portions 1 and 2 of farm 1529: remove Core biodiversity designation. Portion 2 is an existing school (Generations School), portion 1 is an approved (unbuilt) school	Southern	No change required to MSD.	Some technical corrections recommended to the Bionet data owners are in process and will be visible in the next publication. The Biodiversity Network on the MSD Biodiversity Network & Marine Protected Area map 5b and used in the related DSDF maps is timestamped June 2021. It does not reflect all land use changes that have occurred since June 2021.	

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Headland Town Planners	External	Southern: Sub-district 4: For NDA "12" the area of co-incidence is not correct: the entire band must be removed, as one is "Riverside extension" (currently under construction) and the other is the approved Protea Ridge residential estate.	Southern	No change required to MSDF.	These New Development Areas overlap Biodiversity Network Core 1 Critical Biodiversity Areas (CBA) and as a result still apply as Areas of Coincidence. Any construction is not yet visible on aerial imagery so the vegetation extent remains as is. The classification as Areas of Coincidence acknowledges the intention for the sites to be developed despite the presence of CBA. In the MSDF Map 5d Consolidated Spatial Plan Concept, these sites are categorised as Incremental Growth & Consolidation Areas to reflect their planned future state.	
Headland Town Planners	External	Khayelitsha: Sub-district 8: the potential industrial is incorrect: the lower rectangle of it is existing residential, and the gap between the existing Engen and the mixed use designation, should also become mixed use	KMP	No change required to MSDF.	Forwarded to DSDF Teams.	
Headland Town Planners	External	Khayelitsha: Sub-district 9: These two sites indicated in red, forming part of the Bosassa link and Mfuleni Central human settlements projects, should be "areas of coincidence, as the City's environmental departments has already agreed to suitable off-set sites in mitigation of losing these two bio-diversity areas to housing.	KMP	Minor change on MSDF Maps.	The version of the Biodiversity Network used in the SDFs is timestamped June 2021 and an official Biodiversity Network update is not yet ready. Unfortunately, the Northern site is out-of-date in the mapping of the current extent of the vegetation as reflected in MSDF Map 5b Biodiversity Network & Marine Protected Areas. However, it has been mapped as Area of Coincidence with a more up-to-date extent in the DSDF district scale map and is no longer mapped as Critical Natural Asset in the MSDF Map 5d. The Southern site remains Critical Natural Asset in Map 5d.	
Headland Town Planners	External	Northern: Sub-district 2: It is a query, more than a request, relative to the most appropriate SPC: red area to be mixed use, as it includes residential component, in conjunction with the large retail component?	Northern	No change required to MSDF.	Forwarded to DSDF Teams.	
Headland Town Planners	External	Heiderberg: Sub-district 2: NDAs 7 and 8 missing on plan, but referenced in text. The map shows a "9" but the text has no NDA 9	Heiderberg:	No change required to MSDF.	Forwarded to DSDF Teams.	
DEAD_P CMU	External	The NEM: ICMA has been adequately considered in the draft City of Cape Town ("CCT") MSDF with specific references to coastal access and the facilitation thereof; the coastal protection zone ("CPZ") including the importance thereof; and the coastal management line ("CML") and its purpose	MSDF	No change required to MSDF.	Noted.	
DEAD_P CMU	External	The draft CCT MSDF adequately considers the implications of climate change and coastal risks by limiting development seaward of the Coastal Development Edge in order to protect both the environment and the public in accordance with the NEM: ICMA.	MSDF	No change required to MSDF.	Noted.	
DEAD_P CMU	External	In terms of coastal erosion, it is advised that the draft CCT MSDF explicitly states that in terms of Section 15 of the NEM: ICMA erosion protection measures are prohibited within coastal public property. It must be noted that any erosion response methods may only occur within the ambit of legislation and the erection of erosion protection measures may only be considered under certain circumstances. The SD: CM recommends that the Western Cape User-Friendly Guidelines Informing Coastal Erosion Decision Making (2020) be considered in this regard. The document may be accessed via the following URL: https://www.westerncape.gov.za/eadp/files/atoms/files/WC_Guideline%20Informing%20Coastal%20Erosion%20Decision-Making.pdf	MSDF	Improvements to Table 5.5 p. 83 of MSDF Vol I	Improvements to Table 5.5 p. 83 of MSDF Vol I	
DEAD_P CMU	External	Considering the location of coastal properties, be advised that the draft CCT MSDF should also consider the risks pertaining to loss of property should the high-water mark of the sea move inland of the property boundary. In this regard Section 14 of the NEM: ICMA and the Advisory Note from the office of the Chief Surveyor, dated 15 October 2021, applies.	MSDF	No change required to MSDF.	Noted. Considering the sea level rise risks th City did indicate the last information available on sea level rise riks in Cape Town. Specifically on the Climate Change Map 5e.	
Private	External	I would like to record my objection to any future development of the Fish Hoek sports Fields for anything other than its current purpose - a beautiful, safe greenbelt for exercise, recreation and sports activities, and exclusion of motor traffic.	Southern	No change required to MSDF.	Forwarded to DSDF Teams.	
DEAD_P CMU	External	The SD: CM reserves the right to revise its comments and request further information from you based on any information that may be received.	MSDF	No change required to MSDF.	Noted	
Private	External	This email serves to confirm that I highly object to low cost housing bring built on a portion of the Fish Hoek sports field for many reasons that will not be beneficial to the residents in Silverglade especially.	Southern	No change required to MSDF.	Forwarded to DSDF Teams.	

DEPARTMENT/ ORGANISATION	INTERNAL/ EXTERNAL	SUMMARY COMMENT	DISTRICT	CHANGES MADE ON THE MSDP/DSDPS	RESPONSE	COMMENTS FORWARDED TO <DEPT> NAME OR LINK TO DOCUMENTS ON WEB
DEAD_P CMU	External	The SD: CM notes the CCT MSDP the draft SDF/EMF does not make any references to the estuarine functional zone ("EFZ"). It should be noted that the EFZ equates to the 5m contour around the estuary and this area is used as a delineation boundary within estuaries as it encapsulates the most dynamic areas influenced by long-term estuarine sedimentary processes. It should provide a buffer zone that can allow an estuary to retreat in the event of sea-level rise due to climate change and it also allows for the inclusion of some terrestrial fringe vegetation that contribute detritus to the system and refuge areas for many animals, specifically during floods. It is acknowledged that a large portion of the EFZ within the CCT has been transformed through development, however, it is advised that no new developments should occur within the existing EFZ. A valuable resource in this regard is the Western Cape EMFIS: Best Practice Guidelines (2019) found on the departmental website: https://www.westerncape.gov.za/eadp/files/atoms/files/WC%20EMFIS%20Activity%20Guidelines.pdf	MSDF	Reference included in Tech Supplement A.	EFZs are mostly lower than the Coastal Edge and has been considered by the City when the Coastal Edge was delineated with the Provincial Government. The City's Stormwater Management Department, incorporated the guidelines in the Stormwater Management Plans.	
DEAD_P CMU	External	The Western Cape EMFIS Best Practice Activity Guidelines (2019) recommends that unless essential, no development should be approved to take place in the EFZ or the highly dynamic LAZ. These Guidelines recommends that developments must take into consideration any adopted CML and applicable controls, and/or coastal risk lines where high risk areas are identified. Furthermore, avoiding development in at-risk or sensitive areas will help to maintain the ecological integrity of the estuarine environment, prevent disruption of the natural coastal processes, maintain the aesthetic quality, and ultimately protect coastal development.	MSDF	Reference included in Tech Supplement A.	Refer to UDE and CE Report.	
DEAD_P CMU	External	The facilitation of coastal access has been considered adequately in the draft CCT MSDP in accordance with the Western Cape Provincial Coastal Access Strategy and Plan, and it should be noted that the NEM: ICMA specifically refers to reasonable pedestrian access to the coast and not vehicular access, and as such the draft CCT MSDP should make the distinction clear.	MSDF	Policy Statement 20.4 enhanced.	Policy Statement 20.4 enhanced.	
DEAD_P CMU	External	There appears to be no reference in the documents to public launch sites or how the municipality intends to manage these sites. The CCT is participating in the Departmental process of reviewing the list of public launch sites as well as developing operational plans for these sites. This should be reflected.	MSDF	Policy 10 expanded	Policy 10 expanded	
Private	External	We wish to lodge our objections to the procedure that has been adopted to seemingly rail-road development plans and over-ride any informed input from the very people most affected – i.e. the local landowners. The lack of discussion and transparency is suspicious to say the least. Any development of the area has enormous financial and lifestyle implications for us all and we deserve to be respected and informed. The area is already heavily populated by small erfs and spatial planning should be of paramount importance. To pack the recreation area with even more low cost development is of great concern. As property owners we deserve the right of full disclosure before we can be expected to accede to any wholesale development and loss of recreational area. We would like to also have sight of any independent environmental impact surveys.	Southern	No change required to MSDP.	Forwarded to DSDP Teams.	
Private	External	During peak school traffic hours (weekdays 06h30 – 08h00 and 13h00 – 15h30) there is significant traffic congestion on the following roads: Waterloo Road, south into St John's Road, Waterloo Road, north into St John's Road and St John's Road. The proposed densification of Wynberg is likely to contribute to additional congestion on the roads. The proposal for increased office and residential space surrounding the military hospital will see an increase in traffic volumes in the area.	Southern	No change required to MSDP.	Forwarded to DSDP Teams.	
Private	External	Traffic congestion is undesirable owing to time wastage and additional fuel consumption and resulting environmental damage. Additionally, high traffic volumes and traffic congestion in a school precinct pose a risk to the safety of pupils. We ask that the committee considers restoring the SANDF access controlled roads (Fort Street, Nassau Road, Hospital Road and Camp Road) to public access roads. This will allow some of the peak hour school traffic, as well as any future traffic volumes, to use these roads reducing the congestion on Waterloo and St John's roads.	Southern	No change required to MSDP.	Forwarded to DSDP Teams.	

DEPARTMENT/ ORGANISATION	INTERNAL/ EXTERNAL	SUMMARY COMMENT	DISTRICT	CHANGES MADE ON THE MSDF/DSDFS	RESPONSE	COMMENTS FORWARDED TO <DEPT> NAME OR LINK TO DOCUMENTS ON WEB
Private	External	I hereby would like to formally object to the repurposing of a section of the Fish Hoek Sports fields, as outlined in the Southern District Spatial Development Framework (Draft 2 – May 2022) for the following reasons (see full details on the original submission)	Southern	No change required to MSDF.	Forwarded to DSDF Teams.	
Private	External	I like the idea of a mini "Central Park" type of development around Maynardville Park, with downstairs outdoor restaurants and affordable residential units above. I strongly feel, however, that the physical upgrading and densification of Wynberg needs to be accompanied with upliftment opportunities for the people. There is a sense of hopelessness and a lack of pride around main rd at the moment, it would be a pity for this to extend deeper into Wynberg. Im thinking of that old cinema in Park rd? Of the old SAPS buildings IN Maynardville park? Tenterton House? The many abandoned buildings INSIDE the military base? Providing affordable training and jobs in the area would be key to uplift the people. Training for the job market, but perhaps ALSO to give the people a sense of fulfillment? Wynberg can focus on more creative and soul nourishing pursuits for its people and get a reputation as a creative hub? Attracting the greater Cape Town area to enjoy the local creativity? We have the maynardville open air theatre already. We have the restaurants and decor houses in Wolfe st. The Grand Central building in main rd was a physical upgrade on what was there previously. What I'm trying to say is, a physical upgrade is a wonderful idea, but it needs also to nurture the people who will inhabit the new dwellings	Southern	No change required to MSDF.	Forwarded to DSDF Teams.	
Private	External	I strongly object to high rise buildings/apartment blocks higher than 2 stories, 3 at most. Grand Central in Main Road is a nightmare. You should be aware of these problems; lack of payments of rent, the removal of garbage proved to be problematic as rules of depositing garbage is not followed by residents and there have also been complaints relating to drugs. SO PLEASE NO REPEATS OF GRAND CENTRALS IN WYNBERG DENSIFICATION.	Southern	No change required to MSDF.	Forwarded to DSDF Teams.	
Private	External	Regarding Wilson Road: I noticed on the map indications of registered servitude markings the following: Nr 15 (my semi that I own), 19 and 21 are privately owned. 15/17 and 19/21 are semi detached homes, nr 23 are a row of cottages that belong to the council. Why is nr 19 marked as servitude and not 23	Southern	No change required to MSDF.	Forwarded to DSDF Teams.	
Private	External	strongly object to this proposal of the Densification of Wynberg. This will drastically increase crime in the area. Law enforcement cannot cope with the crime at present so we will be overrun if this project is enforced. The historical parts of Wynberg will be lost. The people destined for this housing are not from the area and are part and parcel of those who were dumped in Wynberg after the Covid pandemic. How many of the people this project is intended to assist are actually RSA citizens and not "false" citizens	Southern	No change required to MSDF.	Forwarded to DSDF Teams.	
Private	External	I hope the developers and the City Officials do what they say from this documentary shown to us this evening. I will keep you to this.	Cape Flats	No change required to MSDF.	Forwarded to DSDF Teams.	
Private	External	I strongly object to any development of our sportsfields	Southern	No change required to MSDF.	Forwarded to DSDF Teams.	
Terraplan Associates	External	Proposal to re-instate the site as New Development Area The site was first shown on the 2014 District Plan as New Urban infill on the 2021 draft as Biodiversity & Open Space Network, and on the latest version, as Structuring Open Spaces. It is not clear what prompted the officials to in the latest draft, suddenly demarcate it for structuring open space use. As is set out above, the land holding has been zoned subdivisional area since 2009, and was thus always earmarked for development. To now show a completely different land use not aligning with the previous demarcation, must be an oversight.	Tygerberg District	No change required to MSDF.	Comment forwarded to the DSDF team. Unfortunately on some maps the layer of structuring open space appeared over the suggested land uses. Corrections were made in the layering.	

DEPARTMENT/ ORGANISATION	INTERNAL/ EXTERNAL	SUMMARY COMMENT	DISTRICT	CHANGES MADE ON THE MSD/DSDFS	RESPONSE	COMMENTS FORWARDED TO <DEPT> NAME OR LINK TO DOCUMENTS ON WEB
Terraplan Associates	External	Proposal and motivation to; Re-include this land into the Urban Edge. Re-instate its previous status as urban development/green corridor. Owner currently has land use proposals for a filling station in this position- formal authorization already obtained from Heritage Western Cape on 04 May 2022 (Case No 22033006-AM0412-E), and possible plans for a lower density type eco estate on the balance of the land. Groot Pheasantkraal and thus also this section of land, is historically excluded from the above act in terms of the Department Agriculture register and as gazetted. No consent from the Provincial and National Department of Agriculture for any development on this land, is thus required.	Northern District	No change required to MSD/.	Views have been considered, The Provincial Department of Agriculture has this earmarked as Area of Agricultural significance, and other City departments have concerns to allow the skipping of urban development onto this portion before the development are south of the road has not been fully taken up. The owner can still consider to proceed with the application and motivate deviation with site specific motivations. City will then have to consider under the MPB-L and the Dept of Agriculture will consider it in the LUPA process.	
Terraplan Associates	External	The draft District Plan indicates an apparent sub-stantial part of the land as waterbodies. Proposal to Re-instate the site to its previous status as general industrial development.	Northern District	No change required to MSD/.	Forwarded to DSD/ Teams.	
Terraplan Associates	External	Proposal for the urban edge line to be moved - Eastwards onto the Zevenwacht Link Road eastern boundary. The relevant erven was subject to a Demarcation Board decision and moved into the City of Cape Town area of jurisdiction - farm 241 portion 96 and Zevenwacht Link Road reserve upto Langverwacht Road) should be yellow (residential development and not yellow with dark green hatch lines (Core Biodiversity). The land was subject to an application for subdivision, rezoning, consolidation, approval of phasing and development framework plans over portion of farm 241/87, portion of farm 241/88, portion of farm 241/97, portion of farm 222/99, portion of farm 222/112 and portion of erf 25945, Kuils River, Case ID 70529615, for residential use. The portion of land in this vicinity shown as green hatch lines and shown as core biodiversity areas of coincidence, should be yellow (residential development). Erf 25945 (portion of farm 222/86), Case ID 70327883 was rezoned for residential use on 10 December 2018. The land is currently undeveloped. An application for subdivision, rezoning, consolidation, approval of phasing and development framework plans for urban development. Case ID 70529615 is currently in the final stage to be approved The Draft District Plan indicates this land as potential low density residential development, Core Biodiversity area, and Core Biodiversity area of coincidence. Proposal to To correct cadastral and land use detail on the latest version of the Tygerberg District Plan	Tygerberg District	No change required to MSD/.	Areas of coincidence are where there are compelling urban efficiency, social and economic reasons to pursue development and where core biodiversity may be impacted as a result. Development is therefore expected to take place but with the necessary environmental legislation having been complied with. Biodiversity areas are only removed from maps once the land is cleared.	
Terraplan Associates	External	The latest District Plan indicates all three land holdings as Structuring Open Spaces. These sites were shown on the 2014 District Plan as New Urban Infill, on the August 2021 draft as Biodiversity & Open Space Network and now on the final draft as Structuring Open Space. Proposal to re-instate its previous and correct status of these sites as new development area.	Tygerberg District	No change required to MSD/.	Comment forwarded to the DSD/ team. Unfortunately on some maps the layer of structuring open space appeared over the suggested land uses. Corrections were made in the layering.	
SARDA Brand Ambassador	External	Southern DSD/ page 76, Item 4 of the Volume 2 Draft Technical reportThe document refers to Erf 16 and then lists the 4 erven currently occupied and used by SARDA i.e., Erf 141, 142, 560 and 684. Please can you explain the reference to erf 16 and provide any supporting documentation such as SG Diagrams or Title Deed noting sheets to explain the reference to erf 16. Regarding future use, and the reference to residential infill we would not support residential infill for the following reasons: (see original comment submitted)	Southern	No change required to MSD/.	Forwarded to DSD/ Teams.	
SARDA Brand Ambassador	External	Regarding Development Opportunity, the document DSD/ refers to "the unutilised section of the site". This is incorrect as the entire land parcel consisting of 4 erven is utilised by SARDA (See detail on the original comments submitted)	Southern	No change required to MSD/.	Forwarded to DSD/ Teams.	

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SARDA Brand Ambassador	External	Regarding future use, "Community facilities", we support this use as it speaks directly to the current zoning, SARDA's Constitution and planned educational and medical growth initiatives, and the use for schools, educational and medical institutions that was always intended and included in the property title deeds.	Southern	No change required to MSDF.	Noted	
Planning Partners	External	We objects to the designation of portions of the property (Erven Erven 701 and 551, Chapmans Peak (previously part of Ptn. 5 of Farm No. 1387) are located in the western portion of the Noordhoek Valley, abutting and to the north of Chapmans Peak Drive) by the Draft MSDF as "Critical Natural Asset", i.e. "Critical Biodiversity Area (Core 1: CBA 1a to CBA 2). Map 5b: Biodiversity and Marine Protected Areas and Map 5d: Consolidated Spatial Plan Concept seem to designate portions of both Erf 701 and Erf 551 as "Critical Natural Asset", i.e. "Critical Biodiversity Area (Core 1: CBA 1a to CBA 2)" (refer to Figure 4 below for an extract from the consolidated spatial plan of the draft MSDF). These designations are not supported.	Southern	Minor changes to the map.	Although the version of the Biodiversity Network used in the SDFs is timestamped June 2021 and an official Biodiversity Network update is not yet ready, this particular site has now been edited in the SDFs to reflect the extent of the indigenous vegetation as visible on the most recent 2022 Google Earth aerial imagery. Map 5b Biodiversity Network & Marine Protected Areas displays this extent as it is an informant map depicting the current land cover on the site (existing state). The inclusion of this vegetation as a Critical Natural Asset on Map 5d Consolidated Spatial Plan Concept has been corrected with its re-categorisation as Incremental Growth & Consolidation Area to reflect that development has already been approved (future state).	
Planning Partners	External	We objects to the designation of portions of the property (Erven Erven 701 and 551, Chapmans Peak (previously part of Ptn. 5 of Farm No. 1387) are located in the western portion of the Noordhoek Valley, abutting and to the north of ChapmansPeak Drive) by the Draft Southern DSDF & EMF as "Core Biodiversity", i.e. "Core 1: Protected and Conserved Area" and/or "Core 1: Critical Biodiversity Area (CBA 1a to CBA 2)". See motivation in the original submission saved on SharePoint Figure 10: Spatial Development Framework, Figure 11: GIN & Conservation Biodiversity and Figure 18: The 'Far South' Sub-District of the draft Southern DSDF & EMF seem to designate portions of both Erf 701 and Erf 551 as "Core Biodiversity" and "Critical Biodiversity Area", i.e. "Core 1: Critical Biodiversity Area (CBA 1a to CBA 2)" (refer to Figure 5 below for an extract from the draft Spatial Development Framework). These designations are not supported.	Southern	Minor changes to the map.	Although the version of the Biodiversity Network used in the SDFs is timestamped June 2021 and an official Biodiversity Network update is not yet ready, this particular site has now been edited in the SDFs to reflect the extent of the indigenous vegetation as visible on the most recent 2022 Google Earth aerial imagery. Map 5b Biodiversity Network & Marine Protected Areas displays this extent as it is an informant map depicting the current land cover on the site (existing state). The inclusion of this vegetation as a Critical Natural Asset on Map 5d Consolidated Spatial Plan Concept has been corrected with its re-categorisation as Incremental Growth & Consolidation Area to reflect that development has already been approved (future state).	
First Plan	External	The Blaauwberg District Spatial Development Plan does not make provision for the ongoing financial sustainability to protect and enhance ecosystems in private ownership in highly challenging locations. The DSDF Implementation Plan provides a theoretical overview of available funding mechanisms and then applies them in respect of the spatial development components. It does not, however, address any mechanisms to fund the sustainable implementation of the EMF and environmental conservation imperatives. This is a glaring omission of which Springfontein is now a large, and high impact, case in point.	Blaauwberg	No change required to MSDF.	Forwarded to DSDF Teams.	
First Plan	External	Volume 3 of the Implementation Plan conveniently excludes this area specifically from the environmental priorities in it is public spending programme on p. 34.	Blaauwberg	No change required to MSDF.	Forwarded to DSDF Teams.	
First Plan	External	The Implementation Plan, Volume 3 of the draft Blaauwberg District Spatial Development and Environmental Management Framework, is embarrassing silent on the funding of this 1 000 ha diverse and environmentally unique area that is under intense and organised attack, as is well-known by the Environmental Resources Management Department.	Blaauwberg	No change required to MSDF.	Forwarded to DSDF Teams.	
First Plan	External	Volume 3, p.42 Section 1.6.1.b considers "Income Generation" as a "mechanisms that has a primary objective of generating income to support the implementation of the City's spatial vision." Yet, this approach is selfishly considered from only the City's revenue perspective. For instance, generation income from Nature Reserves to offset environmental cost. It should also be considered from private landowners' perspective. By generating income to support the implementation of the City's spatial vision of conservation for Groote Springfontein.	Blaauwberg	No change to MSDF required.	Forwarded to DSDF Teams.	
First Plan	External	DSDF further fails to recognise the social and economic relationship between Atlantis and the coast. This land that is historical linked to Atlantis has always been seen as the logical next phase of Atlantis. The employment generated by the coastal node and the role that this coastal development can play in the potential growth of the Atlantis industrial area has been ignored in the latest DSDF	Blaauwberg	No change to MSDF required.	Forwarded to DSDF Teams.	

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First Plan	External	The development of the Springfontein coastal node is the only mechanism to ensure future controlled vehicular access to the Springfontein coast. Vehicular coastal access is thus dependent on the development of the coastal node as promoted in the 2012 BDSDF. The current draft B-DSDF does not facilitate vehicular access to the Springfontein coast.	Blaauwberg	No change to MSD/DSDF required.	Refet to UDE & CE Report for UDE adjustments accommodated	
First Plan	External	The sewage system for the Silverstroom resort is in a dismal state and requires significant upgrades to prevent the ecological disaster that is happening as a result. The draft B-DSDF/EMF does not address a vital upgrade to municipal infrastructure at Silverstroomstrand but continue to designate the resort for increased use and mixed-use development. Without the rectification of the existing sewage treatment issues, Silverstroomstrand should not continue to function as a resort for the greater Atlantis area as it is a significant threat to the freshwater aquifer in the area.	Blaauwberg	No change to MSD/DSDF required.	Forwarded to DSDF Teams.	
First Plan	External	The draft MSD states on p.112 under Wastewater and Sewer Reticulation that Groot Springfontein serves a specific resort only, and there is no projected flow growth. The current dysfunctionality of the treatment works and frequent direct spillage into the ocean at a public resort, is not taken into account. It also does not tie up with the spatial directive to make made provision for development opportunities at strategically located identified coastal nodes such as Silverstroomstrand (p 67, Draft MSD/DSDF)	Blaauwberg	No change to MSD/DSDF required.	Forwarded to DSDF Teams.	
First Plan	External	The Draft DSD/DSDF provides no certainty for the future of the Springfontein's biodiversity and coastline, nor for limited development or intensive farming. Both draft strategic frameworks provide objectives and guidelines which are, in some cases, mutually exclusive, and in others ambiguous	Blaauwberg	No change to MSD/DSDF required.	Forwarded to DSDF Teams.	
First Plan	External	The latest DSD/DSDF is silent on employment opportunities, the economic and socio-economic benefits of a Springfontein development while it promotes conservation to the detriment of the resident community. If the B-DSDF 2022 is approved and implemented, the city will once more fail the community of Atlantis and Mamre.	Blaauwberg	No change to MSD/DSDF required.	Forwarded to DSDF Teams.	
First Plan	External	The draft MSD/DSDF is not clear on Urban Edges in the Springfontein / Silverstroomstrand area. Map 4.1: Spatial Transformation Areas (STAs) shows Springfontein is orange as a consolidation area.	Blaauwberg	Minor changes to the map.	Thank you for pointing this out. Springfontein is a Critical Natural Asset and the map has been amended to reflect this.	
First Plan	External	Silverstroomstrand coastal node is not indicated on the MSD/DSDF Consolidated Map	Blaauwberg	No change to MSD/DSDF required.	There are no coastal nodes shown on the Consolidated Spatial Plan Concept Map 5d. Refer to Map 2d for coastal destination places.	
First Plan	External	Proposal is made to Retain the Silverstroomstrand and Springfontein nodes as per the existing 2012 B-DSDF.	Blaauwberg	No change to MSD/DSDF required.	Forwarded to DSDF Teams.	
First Plan	External	Indicate Springfontein as a small local new development area in the vicinity where the coastal edge made provision for such development.	Blaauwberg	No change to MSD/DSDF required.	Refet to UDE & CE Report for UDE adjustments accommodated	
First Plan	External	Add "Springfontein" in section 4.1.4 Sub-district 4: West Coast land use guidelines to the Spatial Objectives for Silverstroomstrand to read: "Recognise Silverstroomstrand coast as a new development opportunity with Springfontein in support thereof and give guidance to its possible development." The "Supporting Land use Guidelines" for Springfontein could include linking the limited development to protecting and funding the balance of the land as a nature reserve in perpetuity and contributing and support to the enhancement of facilities at Silverstroomstrand by, amongst others, creating an eco-friendly walkway between Silverstroom Resort and the Springfontein beach.	Blaauwberg	No change to MSD/DSDF required.	Forwarded to DSDF Teams.	
First Plan	External	Adopt the development guidelines of the 2012 B-DSDF as far as it relates to Springfontein and Silverstroomstrand.	Blaauwberg	No change to MSD/DSDF required.	Forwarded to DSDF Teams.	
First Plan	External	Make provision for the concept of conceptual designation as per the 2012 DSD/DSDF. Allow for the urban and coastal edge in the Springfontein coastal node to be flexible and for the final edges to be inform.	Blaauwberg	No change to MSD/DSDF required.	Forwarded to DSDF Teams.	
Straatwerk.org	External	See Detailed comments on Table Bay Baseline and Analysis report	Table Bay	No change to MSD/DSDF required.	Forwarded to DSDF Teams.	
Straatwerk.org	External	it is imperative for good governance that City economic centres have planned mechanisms to minimise disorderly rough sleeping / squatting / homelessness which, in turn, has a negative impact on the local economy and on the local ecology	Table Bay	No change to MSD/DSDF required.	Forwarded to DSDF Teams.	

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Staatwerk.org	External	The internal dynamics of programs to assist the homeless are the responsibility of social development departments, but it must be realised that only spatial development agency can and should provide for the spatial framework in which such interventions can be optimised. This includes 1) Providing sufficient public ablution facilities (with emphasis on 'sufficient') 2) Planning for suitable spaces where facilities such as overnighting, safe spaces, shelters and drop-in centres can be located (with the emphasis on 'suitable')	Table Bay	No change to MSDF required.	Forwarded to DSDF Teams.	
Staatwerk.org	External	It is also suggested that it is imperative that what is considered sufficient (in terms of locality as well as services) and what is considered suitable (in terms of locality) in this regard, should be thoroughly workshopped since limited perspective on these issues may propose perhaps impressive solutions but which may eventually prove inappropriate	Table Bay	No change to MSDF required.	Forwarded to DSDF Teams.	
PGWC Community Safety	External	The threat of an ever increasing SWM stream in the CoCT create severe challenges and from an environmental management perspective. The responsible disposal of 6,000 tons of solid waste [300 truckloads of 20 tons] on a daily basis [95% from formal residential areas] is a serious reality that indicate the pressing need for the introduction of public private partnerships[PPPs] at a much higher level than what is currently in place. I could not see from the presentation the current situation, as can be reflected on a map, of where there are PPPs with waste recycling partners are in place versus an overlay with [a] population density and [b] formal and [c] informal residential areas. □	MSDF	No change required to MSDF.	The updated narrative contained included in the MSDF has been qualified by the Waste Management Department. Comments and suggestions has been forwarded to the relevant for it to be considered and incorporated. This level of information will best be located in the Sector Plan which should be available to the Provincial Government.	Waste Management
PGWC Community Safety	External	I could not see from the presentation the current situation, as can be reflected on a map, of where there are PPPs with waste recycling partners are in place versus an overlay with [a] population density and [b] formal and [c] informal residential areas	MSDF	No change required to MSDF.	The updated narrative contained included in the MSDF has been qualified by the Waste Management Department. Comments and suggestions has been forwarded to the relevant for it to be considered and incorporated. This level of information will best be located in the Sector Plan which should be available to the Provincial Government.	Waste Management
PGWC Community Safety	External	CoCT is in front in terms of waste recycling if compared with other metros is SA – however, there is still massive scope for expanding waste recycling to areas where PPPs are not operating. The ultimate goal should be to reflect the current footprint of the partners versus goals to expand the reach of these partners to all areas of the CoCT – if goals are not set in this regard, the national goal of zero to landfill site will not get substantial traction in the SWM and ultimately in the SMDF. The expansion of waste recycling initiatives in African countries was recently provided in a DM article and the link is herewith provided: https://www.dailymaverick.co.za/article/2022-08-17-plastic-waste-african-digital-solutions-are-promising-but-there-are-gaps/ □	MSDF	No change required to MSDF.	The updated narrative contained included in the MSDF has been qualified by the Waste Management Department. Comments and suggestions has been forwarded to the relevant for it to be considered and incorporated. This level of information will best be located in the Sector Plan which should be available to the Provincial Government.	Waste Management
FACT (Food Agency Cape Town)	External	As such we propose the following rewording of Policy 21.2. From: Enhance evidence-based planning by improving data accuracy, analysis information and communication to respond to food security interventions and adopt spatial planning processes that protect valuable agricultural areas, viable farmed areas and horticultural areas from urban encroachment. To: Enhance evidence-based planning by improving data accuracy, analysis information and communication to respond to food security interventions and adopt spatial planning processes that protect food security assets, valuable agricultural areas, viable farmed areas and horticultural areas from urban encroachment. In support of this evidence-based planning approach, work to include community-generated data into the evidence-base which informs food sensitive planning. Engage with community food-forums as a means of collaboratively assessing food data and securing community input into City budgeting and planning cycles.	MSDF	Minor adjustment to MSDF text.	Policy statement updated. Comment forwarded to the City's role players in food security, of Future Planning & Resilience.	Future Planning & Resilience, Food Actors
Private	External	Proposal for the recognition by the City of the need and economic stimulus resulting from the upgrading of the winelands Airport to the North of Joostenbergvlagte small holding. In addition the upgrading of the intersection of Lucullus Road and the N1 by SANRAL by 2025 to a four way road of Metropolitan significance will increase accessibility to this area at a Metropolitan and regional scale The area immediately north of Joostenbergvlagte small holding area is already earmarked for urban development and it is understood the application to rezone the land is already underway.	Northern	No change to MSDF required.	Refet to UDE & CE Report for UDE adjustments accommodated	

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Private	External	I would like to see every owner in Joostenbergvlakte to be able to use their property to the full potential whether it is light industrial or not. It will create jobs for the communities in Bloekonbar and Fisantekraal and travel to work and back home will be easy and cost effective for them	Northern	No change to MSDP required.	Forwarded to DSDP Teams.	
FACT (Food Agency Cape Town)	External	We strongly support the inclusion of food sensitive planning in the current MSDP under Policy 21. We also strongly support the evidence based decision making approach outlined in Sub-Policy 21.2. However, as an organisation representing a network of small, community based food actors, it has been our experience that the deep, place-based knowledge of residents within food insecure communities is all too often overlooked. We feel our knowledge, which is grounded in multiple generations of lived experience within these food insecure districts, should be seen by the CoCT as a critical intellectual asset in the fight against hunger. We as community organisations and residents recognise our responsibility to systematically, and reliably document and share our knowledge. We ask that the CoCT meets us, by working to extend its data policies to explicitly make space for our data as one pillar in its evidence based approach to planning and good governance.	MSDP	Minor adjustment to MSDP text.	Policy statement updated. Comment forwarded to the City's role players in food security, of Future Planning & Resilience.	Future Planning & Resilience, Food Actors
FACT (Food Agency Cape Town)	External	As such we propose the following rewording of Policy 21.2. From: Enhance evidence-based planning by improving data accuracy, analysis information and communication to respond to food security interventions and adopt spatial planning processes that protect valuable agricultural areas, viable farmed areas and horticultural areas from urban encroachment. To: Enhance evidence-based planning by improving data accuracy, analysis information and communication to respond to food security interventions and adopt spatial planning processes that protect food security assets, valuable agricultural areas, viable farmed areas and horticultural areas from urban encroachment. In support of this evidence-based planning approach, work to include community-generated data into the evidence-base which informs food sensitive planning. Engage with community food-forums as a means of collaboratively assessing food data and securing community input into City budgeting and planning cycles.	MSDP	Minor adjustment to MSDP text.	Policy statement updated. Comment forwarded to the City's role players in food security, of Future Planning & Resilience.	Future Planning & Resilience, Food Actors
FACT (Food Agency Cape Town)	External	Food Sensitive Planning (as identified in Policy 21) starts with food sensitive participation. Update the current public participation process to ensure greater participation by those involved in food security work across the city. Work with civil society and academia to support the establishment of local food security committees (consisting of local community members, civil society and academia) who inform/comment on development proposals within their sub-districts. Draw on the existing spatial mapping of the spaces within the city where active citizens are championing the fight against food insecurity. In order to reach a younger generation, understand who the current social media influencers are within the food system.	MSDP	No change to MSDP required.	Noted and some food security policy statements updated.	
FACT (Food Agency Cape Town)	External	Revise and extend Policy 21 to make provision for community data in decision making. We strongly support the inclusion of food sensitive planning in the current MSDP under Policy 21. We also strongly support the evidence based decision making approach outlined in Sub-Policy 21.2. However, as an organisation representing a network of small, community based food actors, it has been our experience that the deep, place-based knowledge of residents within food insecure communities is all too often overlooked. We feel our knowledge, which is grounded in multiple generations of lived experience within these food insecure districts, should be seen by the CCT as a critical intellectual asset in the fight against hunger. We as community organisations and residents recognise our responsibility to systematically, and reliably document and share our knowledge. We ask that the CCT meets us, by working to extend its data policies to explicitly make space for our data as one pillar in its evidence based approach to planning and good governance.	MSDP	Minor adjustment to MSDP text.	Policy statement updated. Comment forwarded to the City's role players in food security, of Future Planning & Resilience.	Future Planning & Resilience, Food Actors

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FACT (Food Agency Cape Town)	External	The current framing of Spatial Transformation is deeply problematic and requires change. The current definition of Spatial Transformation also appears to contradict the wider goals and aspirations of the draft MSDF.	All	No change to MSDF required.	Noted but reiterating that spatial transformation is aimed at consolidation and intensification to the benefit of all residents.	
FACT (Food Agency Cape Town)	External	We note that currently the framing of food within the MSDF almost exclusively links back to questions of agriculture and urban production. While urban agriculture is unquestionably important, it represents only one part of a much wider food system across our City. We also note that for many of the City's residents, growing their own food is never going to be a meaningful solution to their food insecurity. Addressing food insecurity requires a broader spatial framing of the assets within the City which promote food security as well as the threats that exacerbate food insecurity (the terms Food Security Asset and Food Security Threat are defined in Section 3.2 below). As such, we propose adding a new policy into Spatial Sub-Strategy 2.4 as follows: Proposed Policy: Identify, conserve and advance food security assets that promote healthy, food secure landscapes P11.1 The assessment of land development proposals and decision-making that affects food security assets as relevant considerations to decision making: _Promote the creation and conservation of food security assets (including informal trading zones, fresh produce markets, community kitchens, food processing facilities, healthy food outlets, agricultural areas, urban grazing sites, food transport and processing nodes, food waste recycling facilities, etc) in as priority objective as far as possible, in order to retain and enhance their contribution to achieving food security and local circular economies. _Carefully consider new developments in food insecure precincts, or vulnerable sub-districts, in relation to scale, form, and placement of new developments (malls, fast food outlets, transport nodes and housing, etc) so as to ensure that new developments do not exacerbate food insecurity by undermining existing food security assets of the precinct or landscape.	MSDF	Minor adjustment to MSDF text.	Policy statement updated. Comment forwarded to the City's role players in food security, of Future Planning & Resilience.	Future Planning & Resilience, Food Actors
FACT (Food Agency Cape Town)	External	P11.2 Establish and maintain district inventories of food security assets and threats. _Compile information on the type, scale and contribution of food security assets and threats within each district to promote evidence-based decision-making. Work proactively with community partners to integrate residents' knowledge into this evidence base. (see aforementioned statement on community-generated data) P11.5 Extend and optimize trading space allocations for micro-enterprises and informal traders around transit nodes as an asset to support economic opportunities for food insecure residents. P11.6. Work to restrict the spread of obesogenic food environments by limiting development applications and trading permits of high-risk foods around sensitive sites such as schools and ECD centres. P11.7 Encourage adaptive use of food trading nodes and urban food markets to promote urban regeneration and tourism, while contributing further to the enrichment of local economies and enrich the quality of urban life. Incorporate these into the nodal development (See comments below on Civic and Business nodes).	MSDF	Minor adjustment to MSDF text.	Policy statement updated. Comment forwarded to the City's role players in food security, of Future Planning & Resilience.	Future Planning & Resilience, Food Actors
FACT (Food Agency Cape Town)	External	The word 'land' is mentioned 646 times within the document. The phrase 'land access' is not mentioned at all. The process of securing access to land needs to be made clearer and streamlined for community members in food insecure areas. In order to meet the objectives laid out in Policies 18 and 21, clearer implementation intent is needed around ensuring spatial access to land. Vacant land and other under-utilised state owned assets in communities need to be made accessible to communities for food related activities such as urban farming, community feeding schemes, and other related activities. This includes unused land within schools, community centres and around municipal assets. Within the diversification of land use, it must be emphasized that land will be used for food production, specifically for small-scale farmers and landless farmers	MSDF	Minor adjustment to MSDF text.	Policy statement updated. Comment forwarded to the City's role players in food security, of Future Planning & Resilience.	Future Planning & Resilience, Food Actors

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FACT (Food Agency Cape Town)	External	In the Draft MSDF a definition of Water Sensitive Urban Design is provided but no definition is provided for Food Sensitive Planning. Food Sensitive Planning is explicitly detailed on pages 65, 134, and 153 (as part of Policy 21: Support food security and ensure food sensitive planning that supports the food system value chain from production, processing, and distribution to access, consumption and waste management.)	All	Minor amendment to MSDF Text.	Updated.	
FACT (Food Agency Cape Town)	External	We also note that when it comes to land access, zoning and rezoning, that questions of cultural heritage are often used as a means of laying additional protection onto culturally significant landscapes. Policy 13 speaks to the protection of scenic routes and places of scenic value, agriculture and rural landscapes. While this is commendable, we do however, observe that spaces of cultural or heritage significance to the urban poor are often accorded equal standing to the cultural assets of the wealthy and middle classes. We argue for the MSDF to consider a wider framing to questions of cultural significance which is better aligned with the economic and cultural diversity of our city.	MSDF	No change required to MSDF.	Comments will be forwarded to the City's role players in cultural heritage and tourism. The MSDF takes data from other specialists departments on heritage and tourism.	Heritage and Food Security
FACT (Food Agency Cape Town)	External	Food Security. Current definition significant nuance. In its framing the current definition focuses predominantly on the household, with a nod to availability of food. This is out of place in a strategic document that seeks to engage and support wider spatial issues, such as the MSDF. Additionally, this is also poorly aligned to existing City of Cape Town Food Security definitions and framing. The City of Cape Town Resilience Strategy frames food security in a very different manner. We argue that the approach adopted in the Resilience Strategy is far more in step with the Cape Town context and contemporary definitions of food security. These framings are clearly evident in Goals 1.1, 1.4, 3.2, and specifically Goal 1.4.1 and 1.4.2. Additionally, the draft IDP (01/07/2022–30/06/2027) offers greater nuance on food security. Engaging the definition of food security also requires alignment to context and Cape Town's specific challenges, both current but also future challenges and the wider sustainability of the Cape Town food system. For this reason, it is suggested that rather than the IPCC definition, with its limitations in focus, the most recent UN FAO High Level Panel of Experts definition be used in the context of Cape Town. Importantly, in an effort to ensure synergy across the region and documents, this definition is also the definition used by the Western Cape Governments Nourish to Flourish Strategy. The definition is as follows: Food security is a situation that exists when all people, at all times, have physical, social and economic access to sufficient, safe and nutritious food that meets their dietary needs and food preferences for an active and healthy life." (HLPE, 2020: 10)[1].	All	Minor amendment to MSDF Text.	Updated.	
FACT (Food Agency Cape Town)	External	The proposed definition is seen as far more robust and strategic in the context of the MSDF as it links Spatial strategy 2 (Manage urban growth, and create a balance between urban development, food security and environmental protection) with Spatial strategy 3 (Building an inclusive, integrated, vibrant and healthy city). Importantly this definition suggests that there are six dimensions of food security, all of which need to be aligned to enable food security and none being more important than another. These dimensions include: Availability, Accessibility, Utilisation, Stability, Agency, and Sustainability.	All	Minor amendment to MSDF Text.	Updated.	
FACT (Food Agency Cape Town)	External	Given the heterogeneity of economic activity across the City, the apparent bias towards the formal in most economic and business framings reads as a perceptual perpetuation of spatial inequality, but also contrary to the articulations of Spatial Transformation (despite flaws) in the definitions. The below definitions all require review and change: ● Business node ● Economic agglomeration ● Economic potential areas ● Civic precinct ● Opportunity Node	All	Minor amendment to MSDF Text.	Updated.	
FACT (Food Agency Cape Town)	External	Food Security Threat Any space, resource or process which threatens the achievement of food security.	All	Minor amendment to MSDF Text.	Noted and Updated	

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FACT (Food Agency Cape Town)	External	As a new concept, Food Sensitive Design is open to interpretation. Would the clearing of informal food vendors for the development of a shopping mall with a supermarket be considered Food Sensitive Design? Would the clearing of a productive urban garden, that may be in contradiction of land use rules for the same shopping mall be considered Food Sensitive Design? These questions are deliberate provocations but are used to support this point. Additionally, as is evident throughout the draft MSDF, Planning, is far more than spatial or even physical planning. The framing of food within the Resilience Strategy highlights two critical aspects. Firstly, food is not just about agriculture and the agricultural zones detailed in the draft MSDF, this is also about food, food security and the food systems as a transversal issue (hence our assertion of the need for the new term Food Security Asset to define this beyond agricultural land).	All	Minor amendment to MSDF Text.	Noted and updated where possible.	
FACT (Food Agency Cape Town)	External	'Spatial Strategy 3: Build an inclusive, Integrated, Vibrant and Healthy City.' (pg.66) does not make mention of food, hunger, nor nourishment. Are we to assume that it is presumed that a healthy city is not a hungry city? The definition of a healthy city must be expanded and elaborated to include mental health, food security and social cohesiveness. Similarly, what is envisaged when safety and wellbeing are mentioned? Again, food security is not explicitly mentioned. In order to avoid , 'the creation of new structural imbalances'. The reality of a food insecure 'Urban Inner Core' must be addressed, highlighted and mentioned to ensure that the City understands the dire situation that most of it citizens face.	All	Minor amendment to MSDF Text.	Extra food security elements added in the policy statements.	
FACT (Food Agency Cape Town)	External	We propose the following three terms be added to the definitions within the MSDF as follows: Food Sensitive Planning Food sensitive planning emerged from water sensitive design and involves an active strategy whereby food security and food system impacts are considered in all planning processes. Food sensitive planning includes specific food and planning related activities.(e.g. zoning for agricultural activities, inclusion of supportive infrastructure for food preparation and storage in trading spaces). It also includes a consideration of food in other planning activities. (e.g. precinct planning, solid waste management). Food sensitive planning spans physical planning, spatial planning, urban design and governance planning.	All	Minor amendment to MSDF Text.	Noted and updated where possible.	
FACT (Food Agency Cape Town)	External	Food Security Asset Any space, resource or process which contributes to achieving food security.	All	Minor amendment to MSDF Text.	Noted and Updated	
FACT (Food Agency Cape Town)	External	Through the definitions significant changes are noted in how certain aspects are framed. These changes are further noted within the overall draft MSDF. While above has offered critical comment, we would be remiss if we did not recognise and directly articulate our appreciation for the reworking and expansion of other framings and definitions. We certainly hope that these remain in the draft MSDF. Areas of agricultural significance Areas of high potential and unique agricultural land worthy of long-term protection given unique production, cultural and heritage attributes. This includes land that is currently cultivated, has been cultivated within the past 10 years, has the soil potential to be cultivated or be regarded as high-value grazing land, and contributes to food security, irrespective of extent. This can include non-arable land that supports the ecological support system. Critical Natural Asset Protected and Conservation Areas, irreplaceable Core 1 Critical Biodiversity Areas found outside of designated New Development Areas, Philippi Horticultural Area, land seaward of the Coastal Edge, and mountainous areas performing an agriculturally-significant or catchment function.	All	No amendment to the MSDF text.	Definitions remain as they are. No proposed changes.	
DEA&DP	External	The identification of areas for inclusionary housing has been raised, however, the key aspect which the municipality can improve upon, is by indicating more specifically where such inclusionary housing initiatives should be located.	All	No change required to MSDF.	The Inclusionary Housing policy is under development. This also include the delineation of the preferred areas. Once available and approved by Council, will be incorporated in the MSDF and DSDF.	

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DEA&DP	External	This map shows "possible employment concentrations (2040)". A number of these "concentrations" are on or very close to the municipal boundary, yet it appears as if the impact on the neighbouring municipality, in particular Stellenbosch and to a lesser extent Swartland, has not been considered. This is especially concerning as for the most part along the boundary with the City, Stellenbosch has high value agricultural land which will be negatively impacted on by the adjacent urban development. The issue of not sufficiently considering what is happening on the other side of the City boundary and the impact on neighbouring municipalities needs to be considered in this SDF. (This matter has not been addressed in the DSDF's either). A good starting point to address the issue of cross municipal impact would be to compile a map which includes the City SDF Composite map as well as those of adjacent municipalities. Through this exercise one would very easily be able to tell where the points of potential conflict are.	MSDF	No change required to MSDF.	The potential location of employment centres was an extensive project called the Land Use Model which is a scenario planning process estimating the potential location of retail, commercial and industrial land uses are positioned in space for 2040. The most recent update of the LUM is described in the MSDF Vol II with Technical Supplement B and F. The notations of potential employment centres comes from either approved industrial, business or office nodes, or nodes under development, which might realise by 2040. Map F12a in Vol II indicates the industrial and commercial areas in the City as well as the locations where building construction has been completed over the past 5 years. It does show new commercial and industrial areas on the periphery with more limited redevelopment in existing industrial and commercial areas. The locations on Map 5d should more less correspond with the cumulative information on Diagram 3b, Vol I indicating the potential office, retail and industrial locations for 2040. Most of these are existing right (some unrealised) or fairly advanced locations already in pre-application processes. The City asked DEADP to generate on behalf of the City, in association with neighbouring municipalities, Table D1 as the most prominent cross-border issues. The issue of proximity of industrial, commercial, retail or office nodes close to the municipal boundary was never raised as a concern before.	
DEA&DP	External	These are very useful maps which could all benefit from the placement of a "ghosted background image" of the safety radii of the Koeberg Nuclear Power Station. This is a major factor which has an impact shaping the metropolitan expansion to the north. Please consider the identification of aforementioned safety radii on the relevant maps of the MSDF.	MSDF	Maps 2a - 2g updated	Maps 2a-g updated where possible. The safety radii have now been added to the City Historic Growth map as well. All of the MSDF informant maps 5a-g are to be referred to when considering a development application and each map has been compiled to present a certain theme. With too many features, the maps become illegible.	
DEA&DP	External	Each of the volumes for each of the District Plans should contain an "Acronyms and Abbreviations" Table. With acronyms and abbreviations relevant to that particular volume. Consider adding an "Acronyms and Abbreviations" Table unique to each volume.	All	Minor amendment to MSDF Text.	Documents condensed and annexed.	
DEA&DP	External	This Monitoring and Evaluation Framework requires further unpacking particularly when it comes to the "Core Indicators" and "Supporting Indicators". The indicators currently included do not follow the SMART principle: Specific, Measurable, Achievable, Realistic and Time bound. If one looks at the "Human Settlement Pattern Supporting Indicator", for example, how will one know if human settlement patterns have seen a positive or negative change over the space of a year? Is the intention to look at the number of completed projects over the past year compared to the previous year? Similarly with land invasions, is the intention to compare the number of land invasions from one year to the next and as long as the number is not increasing this is viewed as positive? (The M&E Frameworks in the DSDF's goes into a little more detail but the detail remains insufficient.) Consider the use of the SMART principles for indicators to enhance clarity and useability.	MSDF	No change to MSDF required.	Forwarded to the M&E Team.	
DEA&DP	External	It is recommended that any future review or updating of the Cape Town's Municipal Spatial Development Framework (MSDF) and its eight district plans, must seek to achieve further alignment between it and the City of Cape Town's CIP. This will be imperative in order for Land transport planning to be integrated with the land development and land use planning processes, and the integrated transport plans.	All	No change required to MSDF.	While the new 5 year CIP is currently under review and must still undergo its public participation process, the MSDF does aim to ensure alignment with the latest approved CIP.	Urban Mobility
DEA&DP	External	It is proposed that the amended MSDF and DSDF/EMFs consider recommending that district integrated transport plans be prepared to support the further resolution and implementation of the CIP, MSDF in the transport sector, and spatial, land use and transport planning integration at a greater level of detail.	MSDF	No change required to MSDF.	The Integrated Transport Plan and the Integrated Public Transport Network Plans, are under major review. It is highly complex even on metropolitan level considering the collapse of rail, and rail services and the extremely challenging operational environment for government sponsored public transport modes compared to the taxi industry. Hence once those positions are clear, the MSDF will first be updated accordingly and then the DSDFs.	
DEA&DP	External	The MSDF needs to support the ambitions, and form the spatial component of, the IDP, while recognizing that the impact and time horizon of the MSDF spans multiple IDP terms. Additional City plans and policies that have direct spatial implications and impacts include... the CIP: The CoCT CIP is reviewed annually, with this review and updating process has not yet been concluded. Seeking alignment with the Cape Town's Municipal Spatial Development Framework (MSDF) and its eight district plans will, therefore, be imperative, in order for land transport planning to be integrated with the land development and land use planning processes, and in land use decision making.	MSDF	No change required to MSDF.	The Integrated Transport Plan and the Integrated Public Transport Network Plans, are under major review. It is highly complex even on metropolitan level considering the collapse of rail, and rail services and the extremely challenging operational environment for government sponsored public transport modes compared to the taxi industry. Hence once those positions are clear, the MSDF will first be updated accordingly and then the DSDFs.	

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DEA&DP	External	The Provincial Land Transport Framework (2013) establishes a long-term vision for transport in the Western Cape. In terms of the PLTF's targets, by 2050 the transport system...The PLTF version cited is outdated. The most recent draft of the PLTF is the 2016/17 – 2020/21. The Department of Transport and Public Works is in the process of drafting the 2023/24 – 2027/28 version is underway.	MSDF	MSDF corrected	p. 54 Vol II amended.	
DEA&DP	External	Page 67: Most non-motorised transport (NMT) facilities (comprising primarily of cycling) are still in planning, except for existing routes in Macassar and Broadway Boulevard. While this may be the case, it will be useful to break down any existing NMT facilities/ routes in Macassar and Broadway Boulevard distinguishing between cycling and walking. This will depict the current level and status quo of the District's NMT so that the City's concerns are clearly communicated.	Helderberg	No change required to MSDF.	These principles have been imbedded as part of Policy Statement 6.4 (amongst others) of the MSDF. Further guidelines are elaborated on in the Helderberg District Plan and projects/initiatives informed and communicated through the associated District Implementation Plan. In some cases the NMT routes are too detailed for the maps and has not been reflected.	DSDF Team
DEA&DP	External	This section articulates key overall objectives in relation to movement and development. This section is richly encouraged and is in alignment with the CTMSDF, and the long-term strategy articulated in the existing CITP.	Table Bay	No change required to MSDF.	Noted	
DEA&DP	External	The minibus taxi industry carries a significant chunk of the passenger ridership in the Tygerberg district. It always seems, however, that a significant chunk of planning initiatives for IPTN trunk routes focuses mainly on rail and MyCiti. This usually leads to proposals to introduce a bus system to override or ignoring the existing minibus system is such a space. This usually spikes violent competition over routes and duplication of services. The result is loss of precious innocent lives and exorbitant costs in infrastructure and property damage. While the integration and collaboration required to recognize, accommodate and make deliberate provision for the minibus taxi industry may be deemed relevant mainly to the CITP, it needs to echo through all planning strategies so that it enjoys equal priority with rail and MyCiti.	Tygerberg	No change required to MSDF.	These principles have been imbedded as part of Policy Statement 6.4 (amongst others) of the MSDF. Further guidelines are elaborated on in the Tygerberg District Plan and projects/initiatives informed and communicated through the associated District Implementation Plan	Urban Mobility
DEA&DP	External	Section 5.3.1 Existing Infrastructure and Services: The reinforcement of public transport investments in the Cape Flats DSDF, is encouraging as this has historically been a district of under-investment in this standard of infrastructure.	Cape Flat	No change required to MSDF.	Noted	
DEA&DP	External	much effort and attention should be paid to NMT plans and promoting the use of NMT through the quality of public space provided around it, in order to promote and prioritise Transit-Oriented Development (TOD) and to improve the City of Cape Town's integrated Public Transport system. This will enable the City to secure investment funding and also assist with encouraging infrastructure planners or transport engineers to proactively consider NMT in future planning projects.	Northern District	No change required to MSDF.	These principles have been imbedded as part of Policy Statement 6.4 (amongst others) of the MSDF. Further guidelines are elaborated on in the Northern District Plan and projects/initiatives informed and communicated through the associated District Implementation Plan.	DSDF Team
DEA&DP	External	Diagram 1a: Strategic Focus Areas is not legible. Consider amending diagram	MSDF	New infographic inserted	New infographic inserted.	
DEA&DP	External	Page 112, Section 2.1. Wastewater and Sewer Reticulation, 2nd last paragraph: Do these figures refer to the total for all WWTWs in the city, per day? Please spatially represent the future regional facilities in the SDF, as illustrated on page 122 (See Map 6.5: Waste water and Sewer reticulation capacity (2020) and project pipeline).	MSDF	No change required to MSDF.	Both the narrative and associated maps contained in the MSDF has been qualified by the Water and Sanitation department. Comments and suggestions has been forwarded to the relevant for it to be considered and incorporated in the next review.	Water and Sanitation
DEA&DP	External	Page 112, Biosolids constitute 150 dry tons, is the City of Cape Town still land farming this and is this still planned to continue, as this is not mentioned in the MSDF document. Please indicate these spatially, where landfarming occurs.	MSDF	No change required to MSDF.	Both the narrative and associated maps contained in the MSDF has been qualified by the Water and Sanitation department. Comments and suggestions has been forwarded to the relevant for it to be considered and incorporated in the next review.	Water and Sanitation
DEA&DP	External	Page 117, Sector: Solid Waste, 5th paragraph, 1st sentence. The Extended Producer Regulations (EPR) will most likely also see further investment in waste collection/recycling infrastructure where there may be opportunity for sharing space and City facilities benefited.	MSDF	No change required to MSDF.	The narrative contained in the MSDF has been qualified by the Solid Waste Management department. Comments and suggestions has been forwarded to the relevant for it to be considered and incorporated in the current or annual review of the MSDF.	Waste Management
DEA&DP	External	Page 118, MSDF Vol I, Sector: Solid Waste, 3rd paragraph. The City indicated that they will extend the lifespan or develop a new landfill site, or that they planned/proposed waste facilities on the existing footprint of Coastal Park (See Map 6.7: Solid Waste services and project pipeline). See Map 6.7: Solid Waste services and project pipeline where clarity should be given on the City's plans for extended/ new/ regional facilities.	MSDF	No change required to MSDF.	The updated narrative contained included in the MSDF has been qualified by the Waste Management Department. Comments and suggestions has been forwarded to the relevant for it to be considered and incorporated. This level of information will best be located in the Sector Plan which should be available to the Provincial Government.	Waste Management
DEA&DP	External	How is the CoCT planning to reclaim the railway line (to the Vissershok Regional Facility) and how are the illegal occupants going to be accommodated by the CoCT?	MSDF	No change required to MSDF.	This comment has been forwarded to the responsible and affected department/s who would need to engage with the rail authorities.	Waste Management

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DEA&DP	External	Put greater emphasis on the imperative of waste minimisation, diversion and re-use, and spatial and land use accommodation of this, given the critical spatial and planning implications of having to secure more and more space for large landfills requiring land extensive buffers etc. The required facilities for waste minimization/ diversion etc should be identified and mapped, or spatial parameters associated with such facilities identified to inform further planning. Has land been earmarked for the relocation of the illegal occupants on the railway line or will this be done in collaboration with PRASA and if so, has it been spatially represented in the SDF?	MSDF	No change required to MSDF.	This comment has been forwarded to the responsible and affected department/s who would need to engage with the rail authorities.	Waste Management
DEA&DP	External	Page 118, As guidance to more local scale planning and land use management, the MSDF could give consideration to how to promote better planning and design for more developmental localized waste drop-offs, sorting and diversion, particularly where informal and semi-formal settlement will persist, and illegal dumping is an ongoing challenge.	MSDF	No change required to MSDF.	This will be a consideration at the localised level as the City produces Local Spatial Development Frameworks and baseline analysis. It is also more related to the sector department's Sector Plan. Suggestions will be forwarded.	Waste Management
DEA&DP	External	Page 118, Strategic intent: Have possible public private partnerships taken into account the proposed private sector proposed WESCO Waste Management Facility which is planned to be built approximately 5km south of Atlantis at Brakkefontein? Private sector waste management facilities which are beneficial to waste management in the City should be included in the maps.	MSDF	No change required to MSDF.	Both the narrative and associated maps contained in the MSDF have been qualified by the Solid Waste Management department. Comments and suggestions have been forwarded to the relevant for it to be considered and incorporated in the next review and possibly better to be incorporated into their Sector Plan. Some incorporation will be possible at Local SDF Level, if applicable. Refer to comments lower down as received from the line department.	Waste Management
DEA&DP	External	Page 119: The sentence reads "The actual land needed to be developed for a new landfill site needs to be identified, although the proxy candidate site identified is in Kalbaskraal. The proxy site has been spatially represented in the MSDF. (See Map 6.7: Solid Waste services and project pipeline). The MSDF should identify possible land for proposed or envisaged waste management infrastructure.	MSDF	No change required to MSDF.	Both the narrative and associated maps contained in the MSDF have been qualified by the Solid Waste Management department. Comments and suggestions have been forwarded to the relevant for it to be considered and incorporated in the next review and possibly better to be incorporated into their Sector Plan. Some incorporation will be possible at Local SDF Level, if applicable. Refer to comments lower down as received from the line department.	Waste Management
DEA&DP	External	Page 119: The City's cleansing branch also requires additional land for the development of new depots..." Existing depots have been spatially illustrated in the SDF, but there is a need to identify additional land for new depots. (See Map 6.7: Solid Waste services and project pipeline.	MSDF	No change required to MSDF.	Both the narrative and associated maps contained in the MSDF have been qualified by the Solid Waste Management department. Comments and suggestions have been forwarded to the relevant for it to be considered and incorporated in the next review and possibly better to be incorporated into their Sector Plan. Some incorporation will be possible at Local SDF Level, if applicable. Refer to comments lower down as received from the line department.	Waste Management
DEA&DP	External	Page 136, Table A3: Consider linking SDG: Achieve Gender Equality and Empower all Women and Girls, which contains specific targets for participation and equal opportunities in political, economic and public life.	MSDF	No change required to MSDF.	Noted and consideration to be given to update SDGs.	
DEA&DP	External	There is no mention of expanding or creating another space for organic waste management (currently only have 1 composting plant). This is important especially in light of the ban on organic waste to landfill. Space for the diversion of organic waste (e.g., composting) needs to be included in spatial planning and in the Development Management Scheme, as guided by the MSDF.	MSDF	No change required to MSDF.	Both the narrative and associated maps contained in the MSDF have been qualified by the Solid Waste Management department. Comments and suggestions have been forwarded to the relevant for it to be considered and incorporated in the next review and possibly better to be incorporated into their Sector Plan. Some incorporation will be possible at Local SDF Level, if applicable. Refer to comments lower down as received from the line department.	Waste Management
DEA&DP	External	There is also a need for considered space for waste collectors/waste pickers (e.g., sorting space). Together with increased separation at source and diversion of waste from landfill, this is required to move them away from landfill and support their efforts (e.g., collection and removal of waste from streets, businesses, etc.). This needs to be included in the spatial planning as part of waste minimisation initiatives. Map 6.7: Solid Waste services and project pipeline, illustrate the waste management activities, however no waste minimisation infrastructure has been indicated on the map. The municipality is advised that it is better practice to spatially indicate the position of such activities.	MSDF	No change required to MSDF.	Both the narrative and associated maps contained in the MSDF have been qualified by the Solid Waste Management department. Comments and suggestions have been forwarded to the relevant for it to be considered and incorporated in the next review and possibly better to be incorporated into their Sector Plan. Some incorporation will be possible at Local SDF Level, if applicable. Refer to comments lower down as received from the line department.	Waste Management
DEA&DP	External	Urban River Corridors and wetlands are not sufficiently acknowledged in the MSDF and therefore there is limited focus on these resources in the MSDF. River corridors and wetlands should be demarcated and included as critical natural assets in order to address pollution of such water resources as well as protect them from (inappropriate) development.	All	Minor amendment to MSDF maps.	Rivers have been included on maps and some text have been updated.	
DEA&DP	External	The municipality is requested to place greater emphasis on Water Sensitive Design (WSD) as part of the New Water Program or under Stormwater management. The current paragraph on Livable Urban Waterways could be expanded to place greater emphasis on this important issue.	All	No change required to MSDF.	Noted .The narrative contained in the MSDF has been qualified by the Water and Sanitation department. Comments and suggestions have been forwarded to the relevant department.	Water and Sanitation

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DEA&DP	External	While it is acknowledged that transport is an important aspect of the MSDF, other services, specifically water, wastewater and stormwater should feature more prominently. Especially in light of the recent significant drought. There is a need for a much stronger and direct link with the City's Water Strategy. Consider featuring the City's Water Strategy more prominently in order for it to strategically impact spatial decision-making.	All	No change required to MSDF.	Noted.	
DEA&DP	External	Data on ambient air pollution and land use management policies should be used to ensure that sufficient measures are taken in terms of both the residential and non-residential land uses to minimize pollution to the extent possible and then mitigate the risks or unpleasantness associated with unavoidable pollution generated on site or by neighbouring land uses. The Land Use Management System should explore mechanisms in this regard, as directed by the MSDF. Hotspots: Paarden Eiland, sand-mining in Macassar, Philippi and Kuils River, Eersterivier industrial area and de Wijnlanden, CTIA, urban development on the urban edge interfacing with agriculture; eg Stellenbosch farms.	All	No change required to MSDF.	Air quality pollution management mechanism falls within the operational responsibilities of the City's Environmental Health. The suggestions and hot spot areas will be forwarded to the department. The department is busy with the updating of the Air Quality Management Plan (2005).	Environmental Health: Air Quality branch
DEA&DP	External	The City needs to consider technological solutions that can be built into these expansion and upgrades, as well as the construction of new infrastructure and closure and rehabilitation of old landfills, that minimizes pollution and the requirement for extensive buffers that are unaffordable, given the scarcity of land and the security costs associated with managing the risks of these areas being informally developed. Hotspots: Potsdam WWTW; potentially the Wildevoelvlei WWTW and old closed landfills at Witsand and Noordhoek.	All	No change required to MSDF.	Both the narrative and associated maps contained in the MSDF have been qualified by the Solid Waste Management department. Comments and suggestions have been forwarded to the relevant for it to be considered and incorporated in the next review and possibly better to be incorporated into their Sector Plan. Some incorporation will be possible at Local SDF Level, if applicable. Refer to comments lower down as received from the line department.	Waste Management
DEA&DP	External	Identification, of appropriate buffer areas around industries, Wastewater Treatment Works (WWTWs), landfill sites etc., and spatially indicated on the respective District Plans in order to prevent such spaces being earmarked or zoned for conflicting land uses.	All	No change required to MSDF.	The risk map 5a contains already some of the information available.	
DEA&DP	External	Old landfills sites should be identified and suitable uses identified, again to prevent unsuitable settlement on this land and to ensure that ongoing odour etc from these sites is properly managed, as well as to ensure that the interface with neighbouring uses is properly managed and new neighbouring developments properly planned.	All	No change required to MSDF.	Both the narrative and associated maps contained in the MSDF have been qualified by the Solid Waste Management department. Comments and suggestions have been forwarded to the relevant for it to be considered and incorporated in the next review and possibly better to be incorporated into their Sector Plan. Some incorporation will be possible at Local SDF Level, if applicable. Refer to comments lower down as received from the line department.	Waste Management
DEA&DP	External	Blaauwberg DSDF: Page 67: Koeberg Power Station - It is important to cross-reference the work of the EPSOC Committee, the Transport Evacuation Model (TEM) and the Emergency Evacuation Zones in this spatial context. Should ideally cross reference this section to page 76, section 6.2.1.3.	Blaauwberg	No change required to MSDF.	Comment forwarded to Blaauwberg DSDF.	
DEA&DP	External	Blaauwberg DSDF Section 6: The importance of public transport mobility and accessibility networks to be considered in terms of its importance in reducing vehicle emissions to the environment. For consideration in respect of air pollution	Blaauwberg	No change to MSDF required.	Forwarded to DSDF Teams.	
DEA&DP	External	Blaauwberg DSDF Section 7 - This section is lacking a very important ecological infrastructure, viz. Air Quality. It is recommended that the City does air dispersion modelling of the criteria air pollutants in the metropolitan area, to inform spatial planning & land use management when proposing new development (e.g. housing, industrial, etc.). Taking potential air emission sources into consideration in an area (e.g. NEM:AQASection 21 Listed Activities), the dispersion model outputs provide an indication of modeled pollutant concentrations at selected downwind receptor locations; eg. if modelled air pollutant concentrations are high, then due consideration must be given in respect of spatial planning for any proposed housing developments. The City has a database of all Section 21 Listed Activities to support such modelling. The City's database of air quality complaints inclusive of noise, dust and odour is also a resource for this kind of intelligence to support decision-making.	Blaauwberg	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	KMPGB DSDF (pg14) With reference to the General Comment: Page 14 (sand-mining in Philippi, Macassar, Kuilsriver); Page 31 (Eersterivier Industrial Area and De Wijnlanden). This is a dynamic area of growth and high levels of informality, as well as three growing industrial areas (Blackheath, Philippi Industrial, and Eersterivier). When combined with residential practices such as open fires for cooking, heating and burning of waste with high wind exposure, air quality and public health impacts ensue. Informal areas should be identified as requiring greater attention in respect of air quality monitoring	KMP	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	CTIA – shows infill development opportunities for industrial and mixed-use development within >70dBA noise zone and close to residential area. This may require more focused attention in order to meet compliance standards.	Tygerberg	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	

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DEA&DP	External	Tygerberg DSDF Page 106: Residential development indicated near a WWTW. This may require more focused attention in order to meet compliance standards. Require clarity on the possible impacts of the WWTW on residential development.	Tygerberg	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	Tygerberg DSDF Page 114 and 117: Residential and mixed-use development next to waterbodies and active farms where there are high levels of particulate matter and health risks. Question the desirability of such land uses in close proximity to waterbodies and operational farms.	Tygerberg	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	Titles, headings, references, headers and footers and maps, do not consistently refer to DSDF / EMF throughout all the volumes. In many cases it refers to "District SDF", with no or little reference to it being an EMF. This may create confusion and it is not clear what parts of the overall document is integrated.	All	Minor amendment to MSDF Text.	Updated.	
DEA&DP	External	The Definitions section refers to "Critical Ecological Support Area". Critical Ecological Support Area" should just be "Ecological Support Areas" in line with the Western Cape Biodiversity Spatial Plan.	All	Minor amendment to MSDF Text.	Updated.	
DEA&DP	External	There is no definition provided for "Environmental Focus Areas". The document should also provide a definition of "Environmental Focus Areas".	All	Minor amendment to MSDF Text.	Noted and Updated	
DEA&DP	External	The City Map Viewer is referred to in the document, where maps can be accessed. However, no link is provided. Also, the maps will also be available for access on the Western Cape Department of Environmental Affairs and Development Planning GIS site and the National Screening Tool. Suggest including reference to the DEA&DP GIS site and the National Screening Tool.	All		Thank you - your suggestions will be considered.	
DEA&DP	External	The narrative text in the document does not consistently refer to the relevant maps. For example, it isn't clear that the "Precautionary Areas Map", is also the map to refer to when considering the infrastructure. E.g. Wastewater Treatment Works or Landfill Sites.		Minor amendment to MSDF Text.	Updated.	
DEA&DP	External	The scale of the geology map of Blaauwberg district is undefined.	Blaauwberg	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	Vol 1 Status Quo, Trends and Patterns- under vegetation section: The Ecosystem threat status is indicative of the degree to which ecosystems are still intact or alternatively losing vital aspects of their structure, function and composition – on which their ability to provide ecosystem services ultimately depends. Suggest that a brief description of the ecosystem threat status be included. Also suggest including a map that indicates original and remaining extent of vegetation.	All	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	Vol 2 Section 1.2. This section only references the SPLUMA principles. Suggest that the purpose in the integrated document must refer to the NEMA principles too, similar to the reference to the SPLUMA Principles.	All	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	Vol 2 Section 1.2. Although this section references the EMF Regulations, this section does not specify NEMA and the EMF Guidelines as part of the legislative / policy context. Suggest adding these to the legislative / policy context of the document.	All	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	The document / maps do not specifically refer to the "geographical area" as included in the EMF Regulations. Suggest that a definition of "geographical area" is included to refer to the City of Cape Town or each District Plan area.	All	No change to MSDF required.	Noted	

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DEA&DP	External	Under the Environmental planning categories and management zones also include the following additional information: A management framework which can be used as a basis for testing development proposals or for developing objectives/goals for a development proposal (i.e. objectives-led planning) and design of a development proposal. The management framework comprises the following: • Zone aim: The overarching vision of what the zone intends to achieve. • Management objectives: These are the objectives that should be borne in mind in the planning of land use and development and in related decision-making processes. • Desired outcomes: These are the effects that one would want to see "on the ground", namely the results of giving effect to the objectives. • Limits of Acceptable Change: These are thresholds that need to be considered in the planning of land use and development and in related decision-making processes. They represent a limit beyond which change in the current status of that particular EMZ would be regarded as undesirable because of the potential for loss or degradation of an irreplaceable resource. These limits are based on the best available scientific information. • Opportunities for benefit: These represent areas where social and/or economic and/or biophysical benefits could be realised. Mitigation options: These show the level of mitigation in the mitigation hierarchy that could be used to address impacts on particular EMZs. Where the attributes/resources are irreplaceable, avoidance (rather than minimising, mitigation or offsetting) is likely to be the sole option.	All	No change to MSDP required.	Forwarded to DSDP Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	The maps do not identify areas where there may be "competing land uses". I.e. Where there is not agreement on the intended use of land. This is particularly important where trying to have one urban edge / area. Suggest that the maps or reference to the maps indicating "competing land uses" be added here in this section. Suggest highlighting incongruencies regarding intended land use on maps. A brief description of these should also be provided.	All	No change to MSDP required.	DSDPs have areas of co-incidence	
DEA&DP	External	No reference to the legal requirements of EMFs and NEMA is included. Only the legal requirements of SPLUMA and LUPA are referred to. Suggest the inclusion of the content requirements of EMFs and also the inclusion of the underlying NEMA principles.	All	No change to MSDP required.	Forwarded to DSDP Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	the "Legislative Context" does not include NEMA and the EMF Regulations. Suggest the inclusion of NEMA and the EMF Regulations as part of the Legislative Context.		No change to MSDP required.	Forwarded to DSDP Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	Section 4.2.4: Note that just as certain activities are no longer applicable when included in the urban area/ edge, there are also activities that become applicable (Listing Notice 3) when indicated as sensitive areas in an EMF or urban area. Suggest that these activities are also listed in this document.		No change to MSDP required.	Forwarded to DSDP Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	Is there a definition of "human settlements" that can be included? This is not needed but can be helpful. Suggest the inclusion of a definition for "human settlements"	All	Minor amendment to MSDP Text.	Updated.	
DEA&DP	External	Support for spatial positioning of the urban edge line in the Durbanville hinterland. This component is encouraged to see that most of the "Critical Natural Assets" in the abovementioned northern areas as well as the north-eastern areas (Durbanville hinterland) have mostly been maintained and even enlarged in some locations.	Tygerberg	No change required to MSDP.	Noted.	
DEA&DP	External	It is encouraging to see the return of the concept of an urban edge line. The Directorate of Land Management Region 1 values the clarity afforded by on the relevant maps as it greatly reduces ambiguity. Accordingly, the assessment of applications on which this Directorate must provide comment in terms of Section 45 of LUPA to the City of Cape Town and abutting Municipalities will benefit.	All	No change required to MSDP.	Noting. Comments on applications as per LUPA Sec 54 is obtained by the applicant independent of the Municipal Planning By-Law and the National Environmental Management Act procedures.	

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DEA&DP	External	Suggest including the following into the narrative of the Implementation Plan to add clarity: The EMF should be used as follows: As a screening tool to evaluate whether the proposed location for a project is appropriate or not. This should be done through consulting both the EMF document and the associated GIS database. "Groundtruthing" would be of assistance in this regard. Where more than one location is under consideration, the EMF could be used to establish which option would be the most suitable. Furthermore, the EMF could be consulted prior to acquiring land (e.g., prior to purchase), as part of the process of assessing its suitability for a particular use, purpose, or project. As a scoping tool to identify the issues that require investigation as part of the EIA process. Each attribute that is indicated as being present at a particular location and its surroundings would need to be considered and relevant specialist input obtained. Note that a site should not be viewed in isolation since impacts can extend beyond cadastral or property boundaries. Thus, attributes within proximity to the proposed development location must also be considered. This would be particularly relevant where a proposed development will rely on resources outside of its boundaries or where it would result in the discharge of emissions, effluent, or wastes. The use of the EMF to assist scoping should involve reference to both the EMF document and the associated GIS database. "Groundtruthing" would be of assistance in this regard. As an impact assessment tool, particularly in respect of determination of the acceptability of impacts. The tables that provide the management framework for each environmental attribute are applicable in this regard. Acceptability of impacts should be tested against the objectives, desired outcomes and limits of acceptable change described in these tables.	All	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	Cape Flats DSDF Vol3: Implementation Plan. With regards to the Cape Flats area the Philippi Horticulture Area (PHA) has been retained as a "Critical Natural Asset" and "Areas of Agricultural Significance" and excluded from urban development as per the current MSDF. Although the PHA is enclosed by urban development it is now further excluded from urban development by means of an inner urban edge which places more emphasis on the importance of protecting this asset. Measures to protect the PHA as a significant resource are supported. It is noted that in the northern section of the PHA a small isolated "Incremental Growth & Consolidation Area" has been demarcated to accommodate the existing Highlands Estate. The current footprint of Highlands Estate appears to be an anomaly and it is encouraging to see that the CoCT has opted to retain it in its current position.	Cape Flats	No change to MSDF required.	Noted	
DEA&DP	External	The Northern District final draft DSDF and integrated EMF indicates the northeastern edge segment as the area in the amended MSDF where the most urban expansion is proposed. The expansion of the urban edge in this focus area, because of development pressures, is supported. A large new "Incremental Growth & Consolidation Area" (new extended urban edge) as proposed to the north of the R312 at Fisantekraal is noted. Encouragingly, in most other edge segments in the Northern District the "Incremental Growth & Consolidation Area" of the current MSDF have been retained in the proposed MSDF amendment of the urban edge delineation with some minor adjustments and refinement. The urban edge positional shifts in this segment are understood and supported in principle.	Northern	No change required to MSDF.	Noted.	
DEA&DP	External	Blaauwberg District Implementation Plan Page 21 - Table 8: Pipeline Projects in the Blaauwberg District All proposed health facilities are included, except for the proposed Protea Park CDC, which was included in the previous draft, but is now excluded from the May 2022 document. The Protea Park CDC -CoCT Clinic Replacement project is planned for the Medium-term, with practical completion envisaged by March 2029.	Blaauwberg	No change required to MSDF.	Comment was forwarded to the Blaauwberg DSDF.	

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DEA&DP	External	Notwithstanding the comments of support for the positioning of the urban edge in principle, should either the Department of Agriculture or this Department's Environmental section not support the inclusion of a specific portion of valuable agricultural land or environmental sensitive area, based on detail determination/analysis, in the urban edge and/or "Incremental Growth & Consolidation Area" this Directorate will support such exclusion. In this regard, this Directorate is aware of the fact that the Department of Agriculture will have "one-on-one" engagements with the CoCT where these conflicting areas will be discussed and refined.	All	No change required to MSDF.	Noted, both Environmental Affairs and Agriculture uses the NEMA, LUPA and 70 of 70 legislated processes for decisions on urban development affecting biodiversity or agricultural resources.	
DEA&DP	External	An aspect that was raised at the MSDF Amendment Departmental coordination meeting on the 14th of July regarding the demarcation of areas where current and new noxious industries are located and/or proposed should be indicated on the amended MSDF is supported. To spatially indicate the location of these industries at MSDF level is important to ensure that planning is undertaken to preserve adequate buffer areas (accommodating compatible uses) between residential developments and these industries, or to timeously steer incremental urban and residential developments away from these industries or to ensure these industries adopt practices that mitigate their impact and monitoring mechanisms to sustain this. The call for the mapping of the location of noxious industries is supported.	All	No change required to MSDF.	The DSDFs indicate all industrial land uses on the proposals maps. The major hazardous installations as registered with the City's Department of Disaster Management, is visible on Map 5a Risks. This include also other risk zones such as those surrounding waste water treatment plans and land fills.	
DEA&DP	External	Cape Flats District Implementation Plan: All proposed health facilities are included, except for the proposed Lotus River CDC, which was also not included in the previous draft document. The time frames do not correspond with the WCGH proposals. The proposed Lotus River CDC Replacement should be included in the document. WCGH has already identified a site and this is considered a Medium-term project.	Cape Flats	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	The Nyanga CDC is still indicated as New / Replacement instead of Upgrade / Expansion, and it is indicated as a Future instead of a Medium-term project.	Cape Flats	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	The proposed Klipfontein Regional Hospital is once again not mentioned.	Cape Flats	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	The Muizenberg, Ocean View and Diep River clinics should not be included in the Cape Flats District document.	Cape Flats	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	The time frames of the following projects should be rectified / amended: Hanover Park CHC: from Future to Short-Medium term. Gugulethu 2 CDC: from Future to Short-Medium term. WCGH intends to build an additional CDC and to incorporate the dental clinic. Land has been requested from the City. Gugulethu CHC: from Future to Medium-term. Vanguard CHC: from Future to Medium-term. The Nyanga CDC is an Upgrade / Expansion project and should be rectified accordingly The proposed Klipfontein Regional Hospital should be included. Muizenberg, Ocean View and Diep River clinics should be removed and included in the Southern District document.	Cape Flats	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	All proposed health facilities are included, except for the Gustrouw CDC Replacement. The proposed Gustrouw CDC Replacement should be included as a Medium-term project.	Helderberg	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	The proposed New Helderberg Regional Hospital (replacing existing district hospital) is still not mentioned. The proposed New Helderberg Regional Hospital should be included.	Helderberg	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	Wallacedene and Fisantekraal are still indicated as clinics, and not CDCs as suggested by WCGH - 'Clinics' to be amended to 'CDCs'.	Northern	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	The Lotus River CDC should not be included in the Southern District document. Lotus River CDC should be removed and included in the Cape Flats District document.	Southern	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	The Wesfleur Hospital Replacement should not be included in this document. Wesfleur Hospital Replacement should be removed and included in the Blaauwberg District document.	Southern	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	
DEA&DP	External	The Victoria Hospital Replacement should not be included in this document. The Victoria Hospital Replacement should be removed and included in the Table Bay District document.	Southern	No change to MSDF required.	Forwarded to DSDF Teams. Air Quality is addressed in a separate policy under development.	

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DEA&DP	External	The New/Replacement Maitland CDC as a WCGH short-medium term project is still not included. New/Replacement Maitland CDC should be included as a Short-Medium term project.	Table Bay	No change to MSDF required.	Forwarded to DSDF Team.	
DEA&DP	External	The New Milnerton Regional Hospital and the New Somerset Hospital replacement are incorrectly indicated as two individual projects. The New Somerset Hospital replacement must be removed. A New Milnerton Regional Hospital is planned to be constructed to replace the existing New Somerset Hospital.	Table Bay	No change to MSDF required.	Forwarded to DSDF Team. Refer to next update of Community Facility modelling.	
DEA&DP	External	The New/Replacement Fackreton Clinic is still included, despite the validity of the project being questioned by WCGH; in view of proposed New/Replacement Maitland CDC as well as the existing Kensington facility which is in close proximity, it is the opinion that the retention of the existing Fackreton facility as a satellite clinic would make more sense. The removal of the New/Replacement Fackreton Clinic, as a project, should be considered.	Table Bay	No change to MSDF required.	Forwarded to DSDF Team. Refer to next update of Community Facility modelling.	
DEA&DP	External	All proposed health facilities are included, except for Ruyterwacht CDC Replacement, which is a Long-term / Future project (included in the previous draft, but now excluded). The Ruyterwacht CDC Replacement should be included as a Long-term / Future project.	Tygerberg	No change to MSDF required.	Forwarded to DSDF Team. Refer to next update of Community Facility modelling.	
Prov Dept of Hum Settlements	External	The NDAs which are all greenfield sites provided for on the urban periphery inside the UDE, which will not advance spatial transformation and densification. It is recommended that an investigation into restrictive overlay zones (minimum erf sizes in southern district areas which are no longer used for rural/agricultural purposes etc.) be done to ascertain whether these zones hinder opportunities for densification in well-located (formalised) areas. For example, suppose they hinder the densification of these large properties (predominantly used for residential purposes). In that case, it is notable that these zones keep market values high, which is difficult for average affordability.	Southern	No change to MSDF required.	Forwarded to DSDF Team.	
Prov Dept of Hum Settlements	External	Understanding how the City will assess their performance in relation to specific actions is also crucial. An increased focus on measuring the progress in the quality of life, access to socio-economic facilities, transport and distance to travel etc., should become the norm. These are elements which contribute to social transformation. There needs to be a greater focus on how City departments will measure performance. Provision needs to be made for a monitoring and results framework coupled to a relevant performance system linked to an outcomes-based approach, e.g. defining Spatial Transformation Performance indicators to measure performance towards spatial transformation and spatial justice.	All	No change to MSDF required.	Forwarded to the M&E Team.	
Prov Dept of Hum Settlements	External	In order to facilitate and expedite future implementation (i.e., rezoning agricultural property when necessary, removing Title Deed limitations, rezoning, etc.), internal municipal planners should proactively rezone land appropriate for affordable housing. Then, consultants and developers can proceed with detailed subdivision plans when necessary. In addition, CoCT must invest in eliminating the administrative roadblocks well in advance of the anticipated development date. It is recommended that CoCT undertake a more proactive planning approach in removing administrative stumbling blocks, e.g. identify land for development in strategic areas, which can initiate development in areas that fast track spatial transformation. This will require an inter-governmental intervention approach.	All	No change to MSDF required.	Forwarded to DSDF Team.	
Prov Dept of Hum Settlements	External	On page 14, reference is made to various housing programmes (Volume 1). However, it should be brought in the context of the PSHDAs, and the restructuring zones conveyed in the District plans. Similar to this is also conveyed on page 49. It is recommended that a stronger linkage is drawn between the Main Document and the respective district plans.	All	No change to MSDF required.	PHSAs are on all the District plans (implementation chapter) and all known projects in the pipelines are visible on maps.	
Prov Dept of Hum Settlements	External	The planning for droughts and the resilience at human settlement creation should be contextualised in line with the City of Cape Town: Resilience Strategy (13 March 2019). Hence, the impact and influence of these cuts across wall-to-wall municipalities need to be considered.	All	No change to MSDF required.	Forwarded to Provincial Spatial Development Coordinating Team.	Human Settlement Department

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Prov Dept of Hum Settlements	External	Whilst planning at government level is important, page 33 recognises public and private partnerships, the role of the 'community as developers' needs more emphasis and how these localised organisations and/or initiatives will be incorporated into the implementation of projects in strategic areas. It is recommended that consideration of the influence and impact of localised community interventions in the policy framework is needed as potential opportunities where these could take place.	All	No change to MSDF required.	City will be putting together visualisation of projects in process in the PHSA which will reflect the information from the DSDFs in a condensed way in PHSA regions	Human Settlement Department
Prov Dept of Hum Settlements	External	The MSDF does not adequately specialise (as per Map 4.1) the City's pipeline of projects for improving informal settlements. Although the publication of this information may raise concerns about possible land invasions, it is vital in directing both private and governmental investment in certain regions. An informal settlements project pipeline is recommended to be spatially reflected in the document.	All	No change to MSDF required.	Forwarded to the Human Settlements Directorate.	Human Settlement Department
Prov Dept of Hum Settlements	External	The MSDF recommends that incentives be developed to allow the private sector to deliver affordable housing; however, there needs to be greater urgency in this regard, given the widespread consensus that the private sector needs to play a significant role and the paucity of suitable policy or incentive development to date. It is recommended that additional analyses of the residential real estate market's demand and supply sides should highlight opportunities to use private developer funding to develop more affordable housing, both for purchase and rental, particularly in areas where market activity has increased since COVID and churn rates are high.	All	No change to MSDF required.	Forwarded to the Human Settlements Directorate.	Human Settlement Department
Policy and Strategy	Internal	The MSDF should articulate the critical assumptions that underpin it. And then the City should track whether those assumptions or conditions are materialising as desired/required in order to yield the outcomes desired and avoid negative externalities. For example if the msdf requires x public transport, y rate of UIC land release and Z rate of affordable housing creation, but these don't happen or happen to slowly, what are the consequences? I see this as being distinct but complimentary to the excellent data work Jaco Petzer is doing to monitor spatial strategy indicators.	All	p 93 adjusted, sharpened and moved to earlier in the text	The essential programmes as listed in the IDP are already listed on p 93, Vol I. The test was sharpened and moved earlier in the document and sharpened to try and highlight the pre-conditions for the spatial vision and the trigger points at which failure to meet pre-conditions will result in a re-strategising of the spatial vision.	
Private	External	The municipality's strategy to address the shortage of Low-cost and Affordable housing seems to be an extension of Apartheid Spatial Planning. There is a definite trend to protect the property values of predominantly white communities (previously white only areas) at the expense of communities in up-market, previously disadvantaged areas. Rather than using vacant land close to predominantly white areas, the municipality seeks to densify previously disadvantaged areas. The net-result, which is already evident in coloured and black communities, is that they are turned into slums, with poor infrastructure and facilities.	MSDF	No change required to MSDF.	The draft 2022 MSDF spatial strategy 3: Building an inclusive, integrated, vibrant and healthy City - comprises 2 sub-strategies, the latter being to "Continue to transform the Apartheid City". MSDF Policy 25 supports and enables programmes that enhance and facilitate land and housing supply in Cape Town. The MSDF sets the overall strategic and implementation intent, thereby providing the policy basis for identification of land via the DSDFs for affordable housing implementation via the appropriate Human Settlements programmes. Chapter 6 of the MSDF (Implementation) supports the implementation of key programmes linked to the 2022-2027 IDP, including the Human Settlements Strategy Implementation Framework and associated Human Settlements Sector Plan. Included amongst these is the Consolidated Land Pipeline (CLP) and (affordable housing) Land Release Programme, of which the intention is to make available well located land for affordable housing.	City of Cape Town: Document Centre: Human Set
Private	External	A prime example of the municipality's reluctance to build low-cost and affordable housing in areas close to predominantly white areas is that previous Integrated Development Plans (IDPs) made provision for open sections of land between Haasendal and Bottellary Road (next to Kuils River Golf course) to be zoned for social housing. This was also confirmed by Sub-council 21 officials at a Sarepta Community Hall meeting where it was announced that social housing (BNG) would be built on this open land. However, for some or other reason this land was sold to private developers and the intended social housing never materialised. The following link is to an Argus report on the selling-off of this property, as well as Rights Group Ndifuna Ukwazi's response to this transaction. □ https://www.pressreader.com/south-africa/cape-argus/20180313/281479276933476 The question is "what happened to this project?" and where in your MSDF/DSDF do you make provision for the promised Social Housing (BNG) in this area?	MSDF	Await feedback	The site in question was identified as an area for further investigation for inclusionary housing (which was defined as including possible GAP and/or social housing typologies) in the 2012 DSDF. It was found that an extensive portion of the site holds formal protection status, i.e. the Haasendal Conservation Area and large portions of the remaining extent is identified as a critical natural asset due to the existence of Core 1 biodiversity. In addition it was located outside of a social housing restructuring zone and was unserved by public transport. Therefore, the site was determined to be unsuitable for social housing. However, the site still holds potential for development of medium density housing where the feasibility of suitable housing typologies and developable extent would be determined through the relevant specialist studies including EIA, TIA HIA, bulk service capacities etc. Awaiting feedback from the social housing branch.	Social Housing
Private	External	MSDF/DSDF should Clearly identify land across the Western Cape metropolitan areas that MUST be set aside for low-cost and affordable housing. Low-cost and affordable housing MUST be included and integrated into predominantly white suburbs in the same way that it is being done in up-market coloured and black suburbs	MSDF	No change required to MSDF.	The DSDFs contain indications on the Implementation Maps of the location of different housing projects under planning and in the pipeline as to be developed by the City's and Provincial Human Settlements Departments.	

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Private	External	MSDF/DSDF should: Avoid coloured and black up-market suburbs that already have low-cost and affordable housing close to them	MSDF	No change required to MSDF.	The regions and sites investigated for government subsidised housing generally depends on the location of sites owned by the City and the Provincial Government or sites located close to the originating locations of potential residents. Beneficiaries generally prefer to be located close to their existing social support systems (such as family), areas familiar to them for economic purposes (where they are used to be trading in the informal economy, or sites close to where their children are already at school. Often there are many complaints of potential beneficiaries not able to manage the relocation costs and adjustments if located too far from their original location. The receiving communities are also not always approving the newcomers. The availability of sites are diminishing and eventually new land will only be available further afield. The National Department of Human Settlements also have Prioritised Human Settlement Areas which were approved by the City Council.	
Private	External	MSDF/DSDF should: Avoid the promotion of Small Rental units in and around up-market housing complexes, in previously disadvantaged areas	MSDF	No change required to MSDF.	The potential location of small scale rental units is generally a market response. But owners need to apply for approval of building plans from the municipality and that is generally preceded by the owner obtaining the approval from their neighbours prior to submission of the building plans. Council is in a process to design the expansion of the programme (as approved in the IDP since May 2022). This is done in association with and with approval of each sub-council. All councillors should have already been consulted during 2021-2022 on the potential areas and councillors have been involved in the delineation of potential incentive areas, or at least commenting on the potential areas.	
Private	External	MSDF/DSDF should: Prioritise the provision of low-cost and affordable housing in available vacant land to expand and increase housing for previously disadvantaged citizens, especially in areas close to transport and economic opportunities, and close to predominantly white suburbs, that have been shielded from this impact.	MSDF	No change required to MSDF.	The prioritised human settlement areas and proposed social housing restructuring zones (both Council approved and Gazetted) reflect those areas where targeted housing programmes should be prioritised, subject to the availability of suitably located land. The above zones contain areas where the Municipal Council and the National Department of Human Settlement were convinced that the criteria for subsidised government housing projects were met. This included the pre-requisites of the location to enhance spatial transformation, lead to integration of communities and where projects will be close to employment opportunities/ centrally located.	
Private	External	MSDF/DSDF should: Clearly identify infrastructure upgrades and the building of additional infrastructure as required by the expansion of all suburbs. This includes basics, such as Sewerage infrastructure, Water and electricity supplies, schools and clinics, Safety and security services, Etc.	MSDF	No change required to MSDF.	The City produces a Land Use Model (see Vol II of MSDF for Technical Supplement), which tries to estimate based on scenarios the urbanisation trends and the impact on land use demands in the residential and non-residential space. This information is forwarded to the Engineering Services Departments which then incorporate the scenarios into their Master Plan updates.	
Private	External	The government whether National/Provincial/Local has a Constitutional obligation to provide houses for its citizens especially for those who are unable to have the means to provide housing for themselves. It is unacceptable and inexcusable for the City of Cape town to shirk its responsibility in this regard at the expense of previously disadvantaged communities under the pretext of "economic empowerment". What is of grave concern, is the lack of engagement with, and communication to affected communities. It is blatantly clear that the use of local newspapers such as The Argus and Burger to request public participation is out-dated and antiquated. Yet the municipality persists with this process because it serves their purpose, even though it clearly subverts the democratic process and the rights of citizens.	MSDF	No change required to MSDF.	The Small Scale Rental Unit growth pattern is a market response by property owners which the Council is having difficulty to control due to the fact that residents optimize their properties for economic and income reasons. The inability of government to provide a large enough number of subsidised houses/ dwelling units at a fast enough pace, are the reasons for the rapid development of this market trend. Council is basically trying to facilitate the growth of these market to ensure that the units are safe from a health and fire perspective. The City exploited all available channels of communication in advertising the MSDF/DSDF public engagement process. This includes online and social media and videos. All sub councils were closely involved in the communication and public engagement process. The public participation process was endorsed by the SPE Portfolio Committee in terms of its delegations to approve public engagement processes linked to spatial policy development.	Public Participation Department
Private	External	With reference to the "Report To Sub Council 21 – 21SUB33/03/22 – Small-Scale Rental Units", it is not clear where and how it fits into the SDF. However, it is another example of how up-market areas, such as Highbury are being compromised, while predominantly white areas are protected. If Small-Scale Rental Units is such a great idea, and if Highbury is seen to be suitable for this kind of housing, why not include Soneike, Amandelrug, Amandelsig, Rouxville, Jagtershof, etc. into this fabulous idea? Besides, properties in these areas are of similar size and bigger than Highbury, which surely make them more suitable for the erection of Small-Scale units.	Tygerberg	No change to MSDF required.	Under the new IDP there is a full programme regarding Small Scale Rental Units and further processes will delineate areas where opportunities exist for this kind of rental units.	
Solid waste	Internal	The Regional site will be taken through an EIA process. In addition to the Brakkefontein and Kalbaskraal sites, the site selection process will consider the area north of Morning Star and east of the current municipal Vissershok facility, pending a proper feasibility to determine a preferred site.	MSDF	No change required to MSDF.	These details will be used in future and should be included in the Waste Department's Sector Plan.	
Solid waste	Internal	Philippi Node and Emerging Opportunity Area: The has also recorded a number of applications for waste activities which are not supported in terms of the DMS. Is this something that the MSDF will be looking into to support the Waste Circular economy?	MSDF	No change required to MSDF.	This is a regulatory function of Development Management. Comments and suggestions has been forwarded to the relevant for it to be considered.	Development Management

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Solid waste	Internal	The policy statements and maps includes all aspect of waste management and there are no further comments on those.	MSDF	No change required to MSDF.	Noted	
Solid waste	Internal	I also received additional comments from colleagues. I am aware they include other issues such as land use, please feel free to extract what you see relevant to MSDF. 1. Road reserves should be clearly marked and developed sooner than later as these areas are being invaded and creates placed for dumping. 2. Railways should be protected and receive special status for protection as this affected economy and waste strategy and well as traffic reduction strategy. 3. The inward development principal makes no sense to me as the outer edge is already being invaded and the cape flats is already to densely populated , leading to back yard dwellers, etc. 4. Business hubs and industrial hubs should be established on the periphery of the City to ensure less travel and assist with economic growth. 5. City problem buildings must all be put to proper use or demolish for better land use application. 6. Alternative energy generation development should be identified on maps, especially ones already in planning. i.e. wind and solar farms. 7. Phillip area development should not be allowed to protect the food basket and water recharge in the cape flats	MSDF	No change required to MSDF.	Comments and suggestions has been forwarded to the relevant department/s for it to be considered. While the emphasis is inward growth (Urban Inner Core) underpinned by the existing spatial structuring elements, it does not exclude the importance and need to maintain existing neighbourhoods (Incremental Growth and Consolidated Areas). Continuous facilitation and advocacy across the various scales of planning is aimed at ensuring the delivery of efficient and accessible public transport for people to access economic opportunities. Furthermore, the wider comments are addressed throughout the narrative of the MSDF and DSDFs. It will be useful if the Integrated Economic Growth Strategy is studied as well as the Cape Flats District Plan which should be available from the City's Document Centre (online).	DSDF Team
Solid waste	Internal	In terms of Volume 1 of the MSDF pages 124 I note that the capital planned sites are not indicated as "planned" on the map. The below could be due to not having identified the necessary land for the new sites I am working with MIS GIS for the identification of the land. The following area are on the capital budget as planned sites/ per area: 1. Bothasig (erf ERF 8350) 2. Kuilsriver (ERF 7814 KUILS RIVER) 3. Durbanville 4. Macassar 5. Khayelitsha 6. Wesbank 7. Simons Town 8. Mitchell's Plain. Pockets of land is need for Durbanville, Macassar, Khayelitsha, Wesbank, Simons Town and Mitchell Plain.	All	No change required to MSDF.	This level of detail belongs better to the Sector Plan or the Annual Infrastructure Report. Likely this part of the MSDF will be moved to the Annual Report in future and then the level of information can be more detailed and updated more regularly.	Annual Infrastructure Report Team
Solid waste	Internal	With the avail budget and strategy change to move towards smaller facilities we can look at multiple pockets of land in areas such as Khayelitsha, Wesbank and Mitchell's Plain	All	No change required to MSDF.	Noted. This level of information should possibly be fed into the Sector Plan in future.	Annual Infrastructure Report Team
FCC	External	The deficiency in the City's current spatial planning, land use, Development Management Scheme and human settlements strategy is a lack of the existence of a provision found in S24 of SPLUMA, where the City's land use, human settlements strategy and District Spatial Development and Environment Framework is in fact not in line with statutory requirements. This provides for an unlawful impediment to the imposition to said conditions as required by the Act, and can be challenged in a court of law. It is troubling that while knowing that the Development Management Scheme (DMS), and the City's human settlements strategy is not in line with statute and the spirit of the South African Constitution - which seeks to protect the vulnerable in society and address the legacies of apartheid which has as its main foundation/ pillar, Apartheid Spatial Planning - the City has not taken an opportunity since the proclamation of SPLUMA and its conception almost 6years ago in 2013, to amend the City's By-laws to come in line with statutory obligations for municipalities to provide for an affordable housing component within private developments. Here we recommend that conditions be included in the City's densification strategy as found in the integrated spatial development framework as well as your DMS requires that 1.) 45% of a proposed private residential development and 2.) 55% of mixed use development must include affordable social housing (based on a zonal densification strategy from zone 1 to 6) before the City grants approval for any residential or mixed use development.	All	No change required to MSDF.	The City does not presently have an approved inclusionary housing policy. As such, there isn't a firm policy basis to draw from in this regard. However, should an inclusionary housing position be successfully approved, the annual review process will allow for necessary updates to be made.	Human Settlement Department
Solid waste	Internal	I also note that Beaconvale must be removed from page 124 as a planned site, this site is not suitable for development and the development was stopped due to environmental authorisation indicating this. Lastly the correct must be made that Prince George Drive is an existing facility and the total drop-offs are 28 and not 27.	All	Minor changes on MSDF maps and text.	Updated	

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Comm Fac & Health Department	Internal	Inputs to be inserted into the District plans including: 1. Updated Precinct profiles 2. Projects are highlighted in the original submission 3. If capital projects are mentioned in the table, check the attached presentation for detail. 4. The City wide map above is provided as a map package (each district to zoom in and select relevant district boundary)	All	No change to MSDF required.	Forwarded to DSDF Team.	
Erleigh and Associates	External	Comments relevant to Table Bay District - please refer to the districts for responses	Table Bay	No change to MSDF required.	Forwarded to DSDF Team.	
FCC	External	The Philippi Horticultural Area, an agricultural area, 30kms from Central Cape Town, has been threatened by housing developments for over a decade, with threats to this agricultural land, increased and intensified since 2009 by the City of Cape Town. The FCFC proposes that landlords of low rise commercial property (1 to two storey buildings) should be incentivised via rates and rebates to renovate their properties into mixed use, mixed income multi-storey walkup developments.	Cape Flats	No change to MSDF required.	Forwarded to DSDF Team.	
FCC	External	Urban Farming, Recreational Gardens and Farmers' Markets in addition to Craft and Culture villages, should be promoted on the Cape Flats, and on the limits and outskirts of Cape Town's urban area. This will require that Cape Town's current urban edge, i.e. the R300, be protected by the City of Cape Town, from high population density developments, but that this be monitored by National Government.	Cape Flats	No change to MSDF required.	Forwarded to DSDF Team.	
FCC	External	The urban edge should be protected, where low population densities should be encouraged close to and on the urban edge (R300), with urban farming promoted. The PHA should be placed in an agricultural conservancy, where only farming and agro-processing with a low ecological impact is allowed. The urban edge surrounding the PHA, should have lower population densities and lower density housing developments	Cape Flats	No change required to MSDF.	The majority of the PHA has been earmarked as Areas of Agricultural Significance based on the input from the Provincial Department of Agriculture. However the farmers should also work on keeping their land uses to agriculturally related land uses. The PHA at the moment does not carry 'agricultural conservancy' value in the eyes of the National Department of Agriculture due to a very old historical determination related to the Guide Plan. But overall there is no doubt that the PHA is a very important place for food production.	
FCC	External	We view the open space/ land bordered by Ottery Road, New Ottery Road, Muller Road and Old Strandfontein Road (Ottery) as a perfect space for the much need urban park (proposed name: Ottery Urban Park), that could contain recreational (flowers, vegetables and fruit) gardening, Garden Centre (with nursery for seedling cultivation) connected to a green house and restaurant, within a landscape garden with picnic spots next to a retention pond, which could be used to channel excess water away from flooded areas in the PHA, but also linked via a canal network to Rondevlei and onwards to Princess Vlei.	Cape Flats	No change to MSDF required.	Forwarded to DSDF Team.	
FCC	External	We also support an urban park at Montagu's Gift between Strandfontein Road, Stephen Road (off Klip Road), Montagu's Gift Road and Acacia Road, but including smaller green space with Craft and culture village on Knoke park (bordering Strandfontein Road and Boundary Road). Further green space interventions are needed in Hanover Park, Athlone to Manenberg area, Delft and Strandfontein/ Mitchells Plain with our proposal for	Cape Flats	No change to MSDF required.	Forwarded to DSDF Team.	
FCC	External	The Forum of Cape Flats Civics (FCFC) is thus not in favour of a housing development on Youngsfield Military base as this still borders the Cape Flats and is actually close to 12kms drive away from Central Cape Town where we support inner city (CBD and 10kms drive from it) and inner suburb (along the M4 (main road that runs from and to the southern suburbs) and 1km surrounds) affordable social housing that is less than a proximity of 3 to 4min walk away from railway stations along the Southern Suburbs railway line. We however are in favour of using Wynberg Military Base for this purpose.	Cape Flats	No change to MSDF required.	Forwarded to DSDF Team.	
FCC	External	We believe that affordable social housing could also be built on the border of Chucker Road sports grounds, by replacing the fence of the sports grounds with terraced housing with the back of the houses overlooking the sports grounds providing passive surveillance	Cape Flats	No change to MSDF required.	Forwarded to DSDF Team.	
FCC	External	Further housing tenements between Oaklands High School, the M5 and Chucker Road is recommended to be developed to house Oaklands High pupils.	Cape Flats	No change to MSDF required.	Forwarded to DSDF Team.	
FCC	External	We propose that Athlone stadium be upgraded into a world class Leisure and Conferencing facility. By upgrading its conference centre we hope to see the provision of more events space and leisure centre	Cape Flats	No change to MSDF required.	Forwarded to DSDF Team.	

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FCC	External	Urban farming and farmers markets (as well as craft and culture villages) should be a requirement and be promoted on the Cape Flats, the limits and outskirts of Cape Town, in the form of farming/ garden allotments, which can be used for both subsistence farming and small scale [commercial] farming, by DALRD via the Climate Smart Agriculture Strategic Framework and/ or the National Climate Change Bill	Cape Flats	No change to MSDF required.	Forwarded to DSDF Team.	
FCC	External	the City, should stipulate the maximum sustainable size of allotments, within an urban farming zone in the urban areas (i.e. Cape Flats and outlying areas), e.g. up to 1 000m2 per plot and 1 hectare [10 000 m2] per allotment field	Cape Flats	No change to MSDF required.	Forwarded to DSDF Team.	
FCC	External	Agricultural areas/ zones in urban areas should all be declared agricultural conservancies, where only farming is allowed, which can feed into agro-processing centres and farmers markets. a. The PHA should be placed in an agricultural conservancy, where only farming is allowed, b. An Urban Park with a Farmers Markets and a Craft and Culture village, should be started in neighbouring Pelican Park/ New Horizon, and c. Agro-processing park in Lotus River.	MSDF	No change required to MSDF.	The declaration of agricultural reserves (permanent protection of agricultural land) is a function of the National Government.	
FCC	External	A Mitchells Plain/ Khayelitsha Urban Park with retention pond, anchored with a joint Research & Development facility is proposed for Denel's Swartklip land that borders Mitchells Plain and Khayelitsha	KMP	No change required to MSDF.	Forwarded to DSDF Team.	
FCC	External	The City's District Spatial Development & Environment Framework should provide for human settlements and a zonal densification strategy that promote indigenous gardens, which include fynbos, succulents, and plants that don't require lots of water, but also promote the farming of Rooibos on the Cape Flats.	All	No change required to MSDF.	Indigenous gardening could be initiated by any land owner. The Implementation plans of the DSDF highlight the location of future human settlement projects.	
FCC	External	The City should be encouraged to invest in bio-mass power plants, linked to proposed urban agricultural zones and urban farming/ allotment fields, as well as utilising land-fill sites to produce electricity. a. Public Private Partnership (PPP) agreements to build biomass power plants, run by private organisations on a concession basis, should be encouraged respecting location to residential areas.	All	No change required to MSDF.	The suggestion will be forwarded to the Energy Directorate.	Energy
FCC	External	National, provincial, and City governments should subsidise the rollout and installation of roof top photovoltaic solar [hydro] panels and household wind turbines and solar garden or security lights should be along zonal densities based on location in low income and lower middle income communities on the peripheries with pensioners also subsidised, and encourages the implementation of solar farming to low, lower middle income households and pensioners, instead of building of large solar photovoltaic and wind farms on farmland and rural areas.	All	No change required to MSDF.	The City's new IDP makes provision for several initiatives to end load-shedding which include City-initiated and small-scale embedded electricity generation by the private sector. Also refer to the expanded independent power producer initiative. Suggestions forwarded to the Energy Directorate but unfortunately the MSDF cannot address subsidising initiatives expected from National and Provincial Departments.	City of Cape Town Document Centre: IDP 2022-2027
FCC	External	Provincial, City and National Government should subsidise the rollout and installation of a. household waste water recycling and rainwater harvesting systems/ products to pensioners, low income, and lower middle income households. b. The City's District Spatial Development and Environment Framework and human settlements strategy should encourage the rental of roof top space based on location	All	No change required to MSDF.	The City's Water and Sanitation Department produced a booklet on how households can develop and install alternative water and sanitation systems. See booklet at City's Document Centre. Suggestions forwarded to the Water and Sanitation Directorate but unfortunately the MSDF cannot address subsidising initiatives expected from National and Provincial Departments	City of Cape Town Document Center: Alternative Water Installations Forward to W&S
FCC	External	Promote increased population densities in the Cape Town's inner city and inner suburbs (M4 running from Central Cape Town to Plumstead), via affordable housing, while de-densifying overcrowded and reducing high population densities on the edges and limits of society.	All	No change required to MSDF.	The MSDF and DSDFs do suggest increased densities in the different nodes, corridors and the Urban Inner Core. De-densification is not something the MSDF or the local authority can deal with.	
FCC	External	Densification and de-densification should be implemented along a population density zonal scheme, with the City of Cape Town (for example) divided up into population densification zones, starting with zone 1 (Cape Town CBD) to zone 6 (Manenberg till the urban edge). Where the further one travels from the Central Cape Town the less the urban footprint should be, and the less the densities and the ecological footprint.	All	No change required to MSDF.	The MSDF and DSDFs do suggest increased densities in the different nodes, corridors and the Urban Inner Core. For a multi-nodal city like Cape Town the densities further away from the nodes towards the farm areas are generally the lowest density.	
FCC	External	Move the Voortrekker Road BRT to, a. Klipfontein Corridor, linking Manenberg/ Gugulethu to Athlone in a ring road BRT, along Klipfontein Road and then eventually also linking Athlone to Mowbray and Rosbank railway stations. AND b. Robert Sobukwe Road linking Bonteheuwel and Bishop Lavis to University of Western Cape and Cape Peninsula University of Technology (CPUT) campuses in Bellville in a ring road BRT.	Cape Flats	No change required to MSDF.	The transport spatial layers is owned by the technical specialist in the Urban Mobility of the City of Cape Town. Comments and suggestions has been forwarded to the relevant for it to be considered and incorporated in the current ongoing review of the CIP & IPTN.	Urban Mobility

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Stellenbosch Municipality	External	we suggest that you include a buffer of at least 10km at the interface/edge of the maps specifically dealing with agricultural areas of significance and heritage resources.	All	No change required to MSDF.	The Department of Agriculture Western Cape's Areas of Agricultural Significance is already more conservative than the National Department of Agriculture's areas. Especially north of Durbanville. The City has urged National and Provincial Department of Agriculture to use the same line but different principles were used for delineation.	
Stellenbosch Municipality	External	Clarification is required as to which urban edge is proposed, p.113 (Vol 2) and pages 26, 33, and 51 show different urban edges. The following urban edges are not supported, namely; The one which follows the municipal boundary; and The one which deviates (i.e. includes the new development & mixed-use intensification areas) from the MSDF consolidation area.	MSDF	Changes on the UDE were made.	Noted that development should not be allowed up the the municipal boundary, but in some cases around the urban development edge there is no other growth options available.	
Stellenbosch Municipality	External	One of the key amendments includes the proposed industrial and integrated human settlement inside the Urban Development Edge on the eastern side of Botfontein Road and the possible industrial expansion in Kraaifontein to the South of the N1. New development areas are proposed at the Botfontein/Bottelary intersection	Tygerberg	Views considered and negotiated with Dept of Agriculture	Noted the disagreement with the expansion of the UDE in the Botfontein area as well as to the east of the Bontein Road.	
Stellenbosch Municipality	External	Stellenbosch Municipality does not support the proposal for industrial uses to the east of Botfontein Road, as the agricultural properties are regarded as high potential agricultural properties	Tygerberg	Views considered and negotiated with Dept of Agriculture	Stellenbosch municipality and Western Cape Department of Agriculture agrees that the farms to the east of Botfontein Rd should not be developed. The City has made provision for fairly detailed sub district guidelines and phasing conditions which are in the DSDF to ensure that development expansion follows a logical order.	
Stellenbosch Municipality	External	The development of the Polkadraai small holdings or the area next to Haasendal fails to create a balance between urban development, food security and environmental protection, will not assist in creating a healthy city and will reduce employment opportunities, specifically in the agricultural sector. We would therefore advocate for these areas be included in the Spatial Transformation Areas 3 and 4 being Discouraged Growth Areas or Critical Natural Areas and thus not earmarked for urban development.	Tygerberg	Views considered and negotiated with Dept of Agriculture	Noted the disagreement with the expansion of the UDE in the Jacobsdal area. Due to the very large government housing project at Penhill, job creation opportunities are required to be located between the farm land and the new residential area. The Provincial Department of Agriculture agrees with this principle and the delineated UDE line was done in close consultation with the Department. However, detailed studies will still be required to determine specific delineations.	
Stellenbosch Municipality	External	In our view the various district plans fails to acknowledge that the adjacent municipal areas are the single most critical area that should be preserved for food security, quality of its rural and cultural landscape, the huge role it fulfils as recreational are for the Cape Metropolitan area and its significant contribution to the agricultural and tourist economy and hence GDP of the Cape Metropolitan area.	All	Views considered and negotiated with Dept of Agriculture	Noted.	
UCI	Internal	The catalytic precincts comprise a portfolio of projects within an overarching Programme (CLDP). The MSDF Review should refer to the three TOD Catalytic Precincts within the three Metropolitan Nodes and not refer to them as projects.	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Term definition of IPDF to be corrected from 'Development' to 'Delivery'	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Correct acronym for DSDF to be IDSDF&EMF - Apply this throughout the MSDF report.	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Pg 13 4th bullet - 'Development' to be corrected to 'Delivery'	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Pg 14: 2nd bullet - 'Development' to be corrected to 'Delivery'	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Pg 14: 1.2 Spatial targeting and priorities, 5th bullet: "The Catalytic (Land) Development Programme (CLDP) and the Consolidated Land Programme (CLP)." Remove brackets around "land" and fix description of acronym in report to be "Consolidated Land Pipeline".	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Pg 31: Last paragraph: All reference in MSDF to accurately refer to the 8 Integrated District SDF&EMF's. Correct acronym should be IDSDF&EMF.	MSDF	Minor changes to MSDF text.	Updated used DSDFs	
UCI	Internal	Pg 42 CLDP in the CBD of Cape Town to refer to "Gateway Catalytic Precinct".	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Pg 43: Wynberg/Claremont CBD should be referred to as Claremont Kenilworth Wynberg, the classification/naming to be consistent throughout the MSDF and IDSDF&EMF.	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Pg 43: Philippi Node and Emerging Opportunity Area. Philippi Opportunity Area (POA) to be reflected in the name.	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Page 81: Philippi is a Metropolitan node and not a District Node. Remove as District node and Map 5d should be referred to in first column, not Map 5e	MSDF	Minor changes to MSDF text.	Underneath each node of higher order are also district and other smaller nodes.	
UCI	Internal	KMPBG use the correct acronym for the Khayelitsha Mitchells Plain Greater Blue Downs district 'KMPGBD' throughout the reports.	MSDF	Minor changes to MSDF text.	Refer to DSDF Team.	
UCI	Internal	Roads and rail proposals reflected on Map 5d. - The scale at Metro level does not work to show roads and rail. MSDF to refer to IDSDF&EMF at smaller scale.	MSDF	Minor changes to the map.	The symbology has been simplified and hopefully this makes the features on the map more legible. The DSDF maps are to be referred to for all detail at a district scale.	

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UCI	Internal	Amend the Consolidated Spatial Concept Plan, please see below the proposed mapping: The amendments are as follows: - Shifted the Bellville CBD metropolitan node slightly to the south to include the CBD, and be centralized along the Voortrekker road corridor - Shifted Philippi East Node slightly to the left - The POA hatched yellow line should be amended to Metro South-East Opportunity Area - Slightly changed the orientation of the Philippi Opportunity Area (Metro South East Opportunity Area) to include more of Swartklip - Wynberg/Kenilworth/Clairemont should be referred to as Clairemont Kenilworth Wynberg to represent the correct location classification the proposed amendments of the nodes are available as shapefiles - see original comments submitted on sharepoint	MSDF	Minor changes to MSDF text.	The nodes are notional and conceptual and not all proposals could be accommodated.	
UCI	Internal	Pg 86: Remove Swartklip from the list of targeted locations/areas, Philippi/Swartklip should be amended to 'Philippi East' only. Amend Wynberg/Clairemont to include Kenilworth.	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Pg 87: Philippi is not a District Node but a Metropolitan Node, remove from the list of targeted locations/areas	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Pg 88: "DSDF Metro-scale development corridors" – rephrase sentence, what is being referred to?	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Pg 97: Change headings to "1. Bellville Catalytic Precinct" and to "3. Gateway Catalytic Precinct".	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Page 125: Metro plans and policies to be revised". Improve write up of this section. Review of Scenic Drive policy supported.	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Pg 125: Last paragraph: Spelling of IPD to change to IDP.	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	Pg 126: DSDF to be amended to IDSDF&EMF. Check entire MSDF to avoid reference to DSDF only.	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	MSDF Vol 2: Term definition of IPDF to be corrected from 'Development' to 'Delivery'	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	MSDF Vol 2: pg 60 Bellville CBD and Cape Town CBD noted within the Voortrekker Road Corridor	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	MSDF Vol 2: pg 61 Supporting initiatives and priority projects: Refer to Bellville Catalytic Precinct and to Gateway Catalytic Precinct	MSDF	Minor changes to MSDF text.	Updated	
UCI	Internal	MSDF Vol 2: pg 62: Clarify which "Main Road" Corridor. Improve description of Corridor i.e. M4 Fix the name of the metropolitan node to Clairemont Kenilworth Wynberg Supporting initiatives and priority projects: Moquet Farm is the C40 site. Refer to Diep River Catalytic Precinct.		No change required to MSDF.	Updated	
UCI	Internal	MSDF Vol 2: pg 64: Improve description of West/East/Southern Corridor. Refer to Philippi Catalytic Precinct OR Philippi Opportunity Area (POA).		Minor changes to MSDF text.	Updated	
UCI	Internal	MSDF Vol 2: pg 65 Philippi Opportunity Area Catalytic Project to be amended to Philippi Opportunity Area (POA) Catalytic Precinct. This is not a project.		Minor changes to MSDF text.	Updated	
UCI	Internal	MSDF Vol 2: pg 67 The Metro South-East IZ: Athlone Power Station was de-prioritised as a catalytic precinct in 2021 and are now with Energy Directorate. "Philippi priority project" to be amended to "Philippi Opportunity Area". Informal settlements in Philippi i.e. e.g. Kosovo and Sweet Home –		Minor changes to MSDF text.	Updated	
Private	External	While we are in favour of and support the overall conceptual plan, the two issues that concern us are: 1. Large apartment complexes that once built may be mismanaged either from the rental side or Body Corporate side resulting in overcrowding and nefarious activity taking place therein. This is already a concern relating to one of the current large buildings on the Main Road.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	Wynberg East has been a proposed HPOZ for many years. Wynberg East has existing social infrastructure, which still functions and there seems to be a strong case for Wynberg East, especially given the generational continuation (without disruption) the institutional heritage of schools etc, functioning corner shops, small businesses, barber shops, integration. Our concern centers around the areas of Transport, Housing, Infrastructure. We are not opposed to development, but it cannot be done at the expense of the HPOZ, which is in place to mitigate uncontrolled development of an established urban community.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	

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UCI	Internal	MSDF Vol 2: p.68/69 Diagram E2: Amend the Diagram E2: Linkages between nodes and corridors at metropolitan scale – map 1 and 2, please see below the proposed mapping: The amendments are as follows: - The POA hatched red line in map 2 should be amended to Metro South-East Opportunity Area in the legend, and be present in map 1 as well - Slightly changed the orientation of the Philippi Opportunity Area (Metro South East Opportunity Area) to include more of Swartklip - Bellville CBD metropolitan node shifted centralized along the Voortrekker road corridor in both maps. - Shifted Philippi East Node slightly to the left The proposed amendments are aligned with the consolidated spatial map (consistency of mapping throughout). Please also note that the proposed changes/comments of the nodes are available as shapefiles - see shapefiles in the original submission on sharepoint		Minor changes to the map.	The nodes are conceptual and depicted as simple circular or oval symbols to give an indication of the location and relative significance of each node only. They are not intended to convey a realistic impression of the extent or shape of each node.	
Private	External	2. Encroachment of new development on existing properties (example is the Aldro on Wellington Avenue, built into the gutter of the adjacent house to the right as one looks at the building), with seeming lack of concern regarding current residential structures by both the developer and also whomever is signing off on plans from the building side.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	We cannot believe that Harfield village was declared an HPOZ and that Wynberg with so many more settled residents, a community with a built up identity (having escaped the exploits of the Group Areas Act) infrastructure and history in comparison, was not declared as yet. Why not? No issue with Harfield village being declared, but Wynberg East makes for a much better case while the city has kept it as a proposed HPOZ for far too long. Why??	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Planning Partners	External	From fig 1 it is evident that Richmond Business Park is situated in the Incremental Growth and Consolidated Area and is identified as a possible employment concentration. The MSDF incorrectly identifies part of the development as a critical natural asset as well as a critical biodiversity areas on the associated biodiversity network plan (refer to fig 2). The site does not contain any endangered vegetation nor does it represent an area that is of importance in terms of biodiversity. The development was subject to a comprehensive EIA which culminated in a positive Environmental Authorisation. A copy of the EA is contained in our previous comments submitted. Both MSDF and DSDF need to be revised to remove these land use designations as they apply to Richmond business Park Refer to the MSDF biodiversity network plan, the composite Tygerberg DSDF and sub district 1 plans	Tygerberg	Minor changes to the map.	Although the version of the Biodiversity Network used in the SDFs is timestamped June 2021 and an official Biodiversity Network update is not yet ready, this particular site has now been edited in the SDFs to reflect the extent of the indigenous vegetation as visible on the most recent 2022 Google Earth aerial imagery. Map 5b Biodiversity Network & Marine Protected Areas displays this extent as it is an informant map depicting the current land cover on the site (existing state). The inclusion of this vegetation as a Critical Natural Asset on Map 5d Consolidated Spatial Plan Concept has been corrected with its re-categorisation as Incremental Growth & Consolidation Area to reflect that development has already been approved (future state).	
Private	External	Housing One need only look at the disaster that is Grand Central, which has made Wynberg Main Road a no-go area for residents. I don't have enough words to tell you how unhappy we are that our once beautiful suburb has been turned into a slum. And now you want to add more people? The drug dealers will be happy. A large number of potential new customers ☹️. Why can we not first deal with that problem before potentially adding to it. I have not seen any developers proposals, but it is my understanding that they do not include grey water recycling or solar.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	I am also concerned about the City's ability to monitor and police the developers. I have experienced first hand where "mistakes" are made during the construction phase, and which are then left to slide. In the case I know about the developers deliberately deviated from the plans, knowing full well that they would get away with it. I urge the City to consider our objections to this proposal, and help us to improve our existing infrastructure first before exacerbating the problem.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	We, C.L. & D.Maidwell of 45 The Glen, Silverglades, hereby lodge our objection to the proposed development to Fish Hoek Sports field for the following reasons : 1.Influx of people due to additional buildings (dwellings and offices) 2.Strain on services ie water, sanitation, electricity 3.Shrinkage of green belt.Land is becoming limited without having to add more development.Rather upgrade the existing sport facility to attract players and put Fish Hoek back on the sporting map.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	

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Private	External	I am extremely concerned about the proposed densification of the area. The sewage pipes are so old and is buckling under the pressure of an area that is already overpopulated due to indiscriminate building of apartment buildings. Just this week we had problems with burst sewage pipes in two roads, which some media reported as sinkholes. We also still have some old electrical wiring and transformer boxes in some roads which need replacement. □	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	Transport This issue more than anything else is a major concern for me. With Wynberg being a PTI us residents are subjected DAILY to terrible congestion from taxis and motorists making their way through the suburb, often with risk to life and limb. The taxi drivers are a lawless mob who put residents lives at risk with their reckless behavior, going up one-way streets, speeding near schools, ignoring pedestrian crossings, making their own lanes. The list goes on! The reality is that without the presence of law enforcement officers every day, every conceivable rule of the road is broken. Densifying the suburb will add to the untenable traffic situation. As residents of Wynberg, we are on our own. Why does the City not afford us the same protections as some of our neighbouring suburbs?	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
SAACPP South Region	External	The MSDF should come out clearly with a policy statement about presumption in favour of approval, if any proposal complaint with the MSDF; unless there are site specific reasons that it is not compliant. The impact of development can be mitigated through approval conditions, but the principle of approval when aligned to the spatial policy must be universal.	MSDF	No change required to MSDF.	All decisions on land use rights and amendments are governed by the processes and procedures as laid down by the MPB-L. Even a policy on presumption in favour of approval if aligned with policy (such as MSDF & DSDF) can be opposed when another sequential approval is required from other legislative processes like heritage or environmental conservation or legislation on provincial or national level.	
SAACPP South Region	External	Given that the MSDF has a 5 year review cycle, and its definitions are set at the beginning of its cycle, it is essential to have a definition of Affordable Housing that recognises the impacts of and constantly adapts to inflation and construction costs. If an inflation accommodating definition is not adopted in the MSDF, the upper limit for Affordable Housing household income should be set at least at R30 000 per month to accommodate part the fiscal drag for the next 5 years. It is recommended that the MSDF's definition of Affordable Housing in Volume 1 be expanded to specifically include that "any housing provision that complies with the definition of the Financial Services Sector, annually updated by using the midpoint between the Consumer Price Index and Building Cost Index, is considered as Affordable Housing in terms of the MSDF".	All	Minor amendment to MSDF Text.	Noted and Updated	
SAACPP South Region	External	The plan needs to include an annual review process particularly around infrastructure implementation (a "State of the City" if you will), so that the market can adequately plan and respond to inward focussed development. At present, a large volume of housing provision occurs outside of the Inner Core, and in addition to this the City has acquired/owns large tracts of land for housing outside the Inner Core as well.	All	Par 6.7 updated	The suggested review process, timeframe, conditions and focus was listed in the MSDF Vol I p 125-126. The suggestion comes down to a request for a "State of the City Report" which annually reflects the Infrastructure Implementation status. This suggestion will be discussed with the Policy & Strategy Director who is the author of the Annual Infrastructure Planning & Delivery Framework. Consideration will be motivated for public availability of the IPDF Annual Report. The suggestion also points to a programme towards servicing UIC Located government owned land parcels.	
SAACPP South Region	External	The city is moving towards implementing climate resilience. There is a lack of meaningful reference to off-grid solutions, given the increasing inability of government to provide services. Package plants and solar power provision might become a permanent, rather than a temporary, solution. Of the nearly 800 sewerage pump stations across the city, approximately 50% are in a seriously neglected condition with a significant number of these in a critical state verging on collapse. Eskom has a generation and network/distribution problem. Off-grid service solutions for all services should be encouraged and supported, with the appropriate Development Contribution rebates. These could be added into the MSDF under matters dealing with sustainability; they don't need to cover all services necessarily at this point, but sewerage and electricity most certainly. But it needs to be included as a policy statement, and then reinforced in terms of Development Contributions rebates and IDP review with associated infrastructure plans.	All	No change required to MSDF.	The Water and Sanitation Department's official position is that they do not believe the City should be encouraging a range of off-grid water and sanitation installations/ small installations. It is considered to be not feasible, not cost-effective and no safely manageable over the long term. The Department is taking all measures to remedy backlogs in service capacity with additional investment but at a level which can be sustainably managed in association with tariff level increases. The approach to Water Service Intermediaries (WSIs) as they are called, is defined in the Water- and Sanitation By-Laws. The special cases as documented in the Standard Operating Procedure issued in 2021, for Temporary Package plants provides further detail on exactly how. The Department also enters into WSI agreements with specific customers such as for the Old Mutual- or the V&A Desalination systems to define exactly how it works for them, including the tariffs still payable. The City's document centre carries documents on Alternative Water Installations (2021).	City of Cape Town Document Center: Alternative Water Installations

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SAACPP South Region	External	It is recognised that the Green Infrastructure Map in the MSDF does not form part of the development consistency argument as per table A1a and A1b from page 129 onwards (in main MSDF document). However, there are a few obvious inconsistencies on the map which make its presence in the MSDF confusing, in terms of what the purpose is: - the Cape Winelands Airport is indicated as "Green Infrastructure", as is Cape Town International airport, - whereas Greenville and its extensions are left blank, - as are the mountain slopes between Chapman's Peak and Noordhoek. Similarly, land earmarked for the Vlakteplaas human settlement project is indicated in green. Many of the areas indicated as Green infrastructure are already developed, and/or have existing entrenched rights that have not yet been fully developed/re-developed. The District Spatial Development Plans, however, reintroduce the green infrastructure as an actor in decision making, in section 3 (taken from the Southern District document): "When considering the consistency of proposed development of a site in relation to the integrated DSDF and EMF, consideration must be given to the following: 1. The DSDF map (Figure 10) 2. The relevant Sub-District maps which replicates the DSDF map but includes additional (more local area) detailed spatial designations;"vlt continues very explicitly: "Only if a site development proposal passes through the above without constraints (triggers or cautionaries) can it be considered consistent with the Integrated DSDF and EMF. " And this is specifically linked in the phrase: "interpreting (...) alignment with (...) the spatial designations, consideration may also be given to (...) i. Green Infrastructure (...) and Biodiversity (...)" (own emphasis added). How will this discretion be exercised, as emphasised by "may"? Section 3 confirms that green infrastructure is a spatial planning category, under a slightly different name of "structuring open space".	All	Map inconsistencies are continuously being fixed.	Comments forwarded to DSDF and ERM colleagues for correction. The Map is continuously being upgraded and will be available on the City's external website soon. Ambiguity has been removed from the text.	
SAACPP South Region	External	Volume 4 annexure 4.1 explains the methodology of determining this green space category, however a missing component is that approved and/or existing (historic) development rights. The absence of this consideration leads to a few instances where sites that are developed or have unexercised rights are shown as "green" therefore potentially requiring a consistency ruling. We believe there are only two options in terms of addressing this issue holistically: - The maps need to be edited to remove, from the green category, the various properties that our member firms will be individually supplying, or - This category must be removed from the consistency test, so that there is no room for mis-interpretation.	All	No change required to MSDF.	Comments forwarded to DSDF and ERM colleagues for correction.	
SAACPP South Region	External	An allied point is the biodiversity mapping is still problematic in areas. There seems to be a resistance to correct this information, and numerous approved and developed rights are not reflected on the maps.	All	No change required to MSDF.	The Biodiversity Network on the MSDF Biodiversity Network & Marine Protected Area map 5b and used in the related DSDF maps is timestamped June 2021. It does not reflect all land use changes that have occurred since June 2021. Where a development is approved and the critical biodiversity areas still exist on the ground, they are not removed from the map as the legislation still applies. It is always necessary to contact the Biodiversity Management Branch for the latest information available and for a biodiversity specialist to conduct a site visit. The Bionet information is only removed once construction is completed and after there's a confirmation that the Environmental Authorisation and the Land Use approvals have not lapsed and rights are realised.	
SAACPP South Region	External	We have also picked up occasional inconsistencies between plan versions embedded into the Volume 2 reports, and the high resolution JPGs (for example urban edge lines, spatial categories, existing entrenched rights ignored).	All	No change required to MSDF.	Forwarded to DSDF Team.	
SAACPP South Region	External	Similarly, there are instances where the NDA numbers on the maps do not correlate with the text (an example being Helderberg Sub-District 1: 8 NDAs in text, on map numbering 1-6 and 9; the description of some of the numbers in the text also do not correlate with the location thereof on the map)	All	No change required to MSDF.	Forwarded to DSDF Team.	
SAACPP South Region	External	The various cross references throughout the documents need a final edit, for correctness. For example, in Helderberg DSDF, page 8 refers to "Green Infrastructure and Biodiversity (Figure 10)" and "Culture and Heritage (Figure 11)" but these are maps 13 and 14; there are other such cases.	All	No change required to MSDF.	Comments forwarded to DSDF colleagues for correction.	

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SAACPP South Region	External	The approved HPOZs exist as overlays in the Development Management Scheme, and do not require repetition in the MSDF. "proposed" HPOZs cause confusion as they have no statutory effect until they are approved as components of the DMS. the areas they cover could come to be seen as being a disincentive: the Main Road corridor, along which many of the proposed HPOZs are located, is meant to be an area of the City that is targeted for investment and land use intensification (as per the guidelines contained in the MSDF). Therefore, promoting large areas along this corridor for "heritage protection" seems to be contradictory to meaningful land use intensification, especially considering that private developers have generally begun to steer clear of land or buildings with heritage connotations. The entire Claremont CBD, for example, is indicated as a proposed HPOZ	All	Caveats added to Table A1a & b.	Certain other overlay zones such as the Koeberg Density Overlay Zone are also on the MSDF maps due to the fact that it provides an early notification of critical information. The table in the beginning of the Technical Supplement A, described which of the layers on the different maps will be used as consistency indicators. Heritage, whether it is the declared, proposed or investigated areas, because it is managed via another set of legislation and institution, are only reflected for information purposes and directing applicants to other legislated processes.	
SAACPP South Region	External	In terms of the approved HPOZ themselves, and the fact that they overlap so dramatically with the Urban Inner Core, the Spatial Plan needs to give clearer guidance of the contextual meaning of the HPOZ relative to development intensification. Currently, the HPOZs are all generic in implication; yet these areas are clearly very different in terms of impact, and require different responses, relative to their main characteristics and location in or adjacent development corridors. An example was made that Woodstock main road has a certain street character which is clearly useful to retain collectively, but significant densification at a setback and above would be very appropriate given the location of the street.	All	Updates in Table 4.3	The MSDF cannot resolve the conflict completely but can highlight that complete built form preservation without considering optimisation of the land use and built form, inhibits the vision of the corridors and nodes, targeted for mixed use intensification and densification.	
SAACPP South Region	External	The District Plans include some detailed development 'regulations' under the guide of supporting development 'guidelines' Consideration should be given to formulating a formal (landscape) heritage overlay zone with appropriate provisions to provide protection for an identified 'Arcadian zone'." These Arcadian zones are not found in the document, and therefore the text cannot be approved. But over and above this, the above mentioned, and any similar statements, are not supporting development 'guidelines', but rather development 'regulations' that inter alia: ☐ Are in conflict with the existing development regulations contained in the DMS (overlay zones); ☐ Undermine the incremental densification policy of the MSDF, especially in areas demarcated by the MSDF as "Incremental Growth and Consolidation Areas". As such, these may even be regarded as being in conflict with the policies, objectives and guidelines of the MSDF. Detailed development 'regulations' should not be included in the DSDFs guise as development 'guidelines'. Detailed development regulations should be contained in the appropriate legislation, i.e. the MPBL and its DMS.	All	No change required to MSDF.	Matter has been referred to DSDFs and sub district development guidelines were updated.	
SAACPP South Region	External	We therefore suggest an annual review of key performance issues primarily around transportation and infrastructure provision, as well as the various interrelated aspects around mapping of conflicting zones and/or categories. We are in broad agreement with the core part of the documents. More detailed policy statements and spatial interventions should be up for more frequent review and change than 5 years. If we all broadly support the documents, certain technical issues which could affect the integrity of the document can require more detailed review without having to change the entire documents. This would also allow for matching the MSDF and district plans with services capacity in the event of unexpected changes – unexpected changes which had already resulted in 3 growth areas being hampered due to sewerage provision. Bulk engineering capacities and upgrades need to be reported publicly on an annual basis, with emphasis on implementation timelines.	All	Improvements made in para 6.7 Review Framework	Annual Review Framework components noted and adjustments made in paragraph 6.7.	

DEPARTMENT/ ORGANISATION	INTERNAL/ EXTERNAL	SUMMARY COMMENT	DISTRICT	CHANGES MADE ON THE MSDP/DSDPS	RESPONSE	COMMENTS FORWARDED TO <DEPT> NAME OR LINK TO DOCUMENTS ON WEB
Private	External	1. How will the densification process affect the value of my home when you turn it into a low income area? 2. How many council folks involved in this decision making actually live in the area? 3. Are we going to end up with more drugs, crime, units rented out by the hour, people living the units in shifts by subletting them then they are out at work? 4. Will the betting shops be closed down? 5. Are there sufficient schools and clinics in the area to support hundreds more people? You can't put thousands of people in an area and not provide more schools and clinics. Where are they earmarked on the map? I don't see them. This a huge red flag for me	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Private	External	Page 72. With regard to "enhancing public space". This is a phrase which occurs throughout the document and is a very noble objective. But unfortunately it is used in a misleading and contradictory manner. With regard to development of public open spaces for example, Nirvana Park, it is contradictory to talk of enhancing public open space by building a block of flats on it, thus converting it to private space. This is nonsensical and does not "enhance" or "improve" the public space at all. Furthermore, adding a cell phone tower to Nirvana Park is also contradictory because this will pollute and degrade the area, not enhance it. In short, the document's use of the term "enhancing public space" is illogical and contradictory. Residents are not fooled by this attempt at "sanitizing" the proposals	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Private	External	Page 73 Item 7. The City cannot expect existing ratepayers to agree with densification in their immediate neighbourhoods if it is going to adversely affect them in terms of reduction in the value of their property, more people, more noise, more traffic, etc. However they might be more accepting if there is some form of financial compensation in the form of reduced rates and compensation for a drop in the value of their property. The latter would be measured by having a real estate valuation before and after the proposed densification. We pay high rates in order to live in Constantia and the City is proposing to densify and take away the spaciousness that we actually PAY for on a monthly basis.	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Private	External	Page 73 Item 8 ii b. Recommended maximum (built) coverage is stated as: 50% of erven 1000 – 2000 sq m 30% or 1000 sq m on erven greater than 2000 sq m. I wonder if anyone has thought this through and envisaged the results in a few years time! If applied, this will convert currently spacious suburbs to an urban jungle of brick and concrete. Most rainwater will end up in stormwater drains and the soil and underlying aquifers will suffer. Please, do not allow this.	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Private	External	Page 74 Items 11 and 12. This encourages residential development within 800m of Constantia Village and other development nodes with buildings up to three stories together with low cost housing for low income workers. If low cost housing is built close to my residence I would expect some compensation in the form of reduction in rates and a subsidy to compensate for the loss of capital value when selling.	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Private	External	Page 72 to 77. General. If people wish to live in a more spacious suburb they must expect to pay the appropriate rates and purchase price of properties. This is plain economics. The planning document is trying to artificially engineer the natural order of residential choice by imposing cheap and most likely cheaply-built housing in areas of established beauty and spaciousness, consequently leading to their decline	Southern	No change required to MSDP.	Forwarded to DSDP Team.	

DEPARTMENT/ ORGANISATION	INTERNAL/ EXTERNAL	SUMMARY COMMENT	DISTRICT	CHANGES MADE ON THE MSD/DSDF	RESPONSE	COMMENTS FORWARDED TO <DEPT> NAME OR LINK TO DOCUMENTS ON WEB
Private	External	Vol 4 2022: the City's responses to residents' comments on last year's draft Page 279 Item 5.5. Many residents have specifically objected to the development of Nirvana Park. I have two comments on the City's response: 1. The statement "The open space area serves a relatively small number of surrounding erven (30-40) and is thus comparatively large in extent". This response has not taken into account the comments from residents that the Park is used by many people from well outside the area (Harfield Village and even Sea Point). It is also used as a pedestrian thoroughfare for the significant number of people who take a short cut from Spaanschemat River Road to Ladies Mile Extension via Cumberland Avenue and using the small pedestrian gate access to Constantia Village shops. It is unlikely that the planners are aware of this and I suggested that the City conducts a survey of how well utilized the park is and compare it with other parks. Nirvana Park could be regarded as a "Through Zone" on account of these access routes.	Southern	No change required to MSD.	Forwarded to DSDF Team.	
Private	External	The City has not commented on residents' comments that Alphen Park would be a more suitable area for "development", including erecting a three storey block of flats. There has been no response to our question as to why there is no mention of Alphen Park in any of the planning documents? Its presence seems to have been deliberately overlooked unless it has some kind of special status that we don't know about. Nowhere in Constantia are there three storey buildings – even the shopping centres are restricted to two stories.	Southern	No change required to MSD.	Forwarded to DSDF Team.	
Private	External	The above comments are written from the point of view of a resident of Constantia which is the area I am most familiar with. It is understood that the authorities responsible for planning have no allegiance to a particular area and do not have a thorough knowledge of all areas, therefore it is the responsibility of the resident to draw attention to the pros and cons of the planner's proposals for their area. It is also possible, and indeed likely, that planners and residents have diametrically opposing points of view – for the simple reason that their objectives are totally different. Residents everywhere want to preserve their hard-earned investment in their homes. As a resident of 35 years in the Nirvana Park area of Constantia, I strongly object to the proposal for any development of this much valued public open space.	Southern	No change required to MSD.	Forwarded to DSDF Team.	
Headland Town Planners	External	There is a lack of consistency across the draft district plans, this is evidenced by the structure of the different reports. Below are extracts taken from the Blaauwberg and Cape Flats district Volume 2 documents. Different structures and sections have been included. This creates confusion in working in different districts and applying the district plan documents appropriately. Consistency would be beneficial in allowing professionals and other interested parties to effectively engage and consult the documents when required	All	No change required to MSD.	Forwarded to DSDF Team.	
Headland Town Planners	External	The Blaauwberg Draft District Plan makes reference to a 'conservation and biodiversity map' (see page 41 Blaauwberg DSDF EMF Vol 2 2022 document), while the Cape Flats Draft District Plan makes reference to 'green infrastructure and biodiversity' (see page 51 of the Cape Flats DSDF EMF Volume 2). A consistent approach to data would be useful.	All	No change required to MSD.	Forwarded to DSDF Team.	
Headland Town Planners	External	There are a number of minor editing corrections that need to be made across the district plan documents. An example being from the Blaauwberg Draft District Plan Volume 2 (page 33): On page 123 of the Blaauwberg Draft District Plan, no caption is given relating to the Klein Dassenberg figure shown in the document:	All	No change required to MSD.	Forwarded to DSDF Team.	
Headland Town Planners	External	There are a number of inconsistencies between the overall draft spatial development framework (SDF) maps for each district and their associated sub-district maps. This creates confusion in applying the designation and relevant development priorities per area. Figure 6, an extract from the Cape Flats District SDF Map, indicates an area that is identified as 'structuring open space,' while in figure 7 the same area is identified for 'potential industrial development' and 'mixed use,' with no mention of open space. This misalignment creates confusion in identifying the development priorities for the area and creates uncertainty for development in the area.	All	No change required to MSD.	Forwarded to DSDF Team.	

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Headland Town Planners	External	Similarly, with reference to the Cape Flats draft sub-district 2 map, an area which is identified for mixed use intensification in the Cape Flats SDF overall map is not indicated as such in the sub-district map. Similarly, the cemetery located south of Klipfontein Road is indicated as such on the sub-district 2 map, but not in the overall Cape Flats Draft SDF map. There is also misalignment between areas of 'existing urban development,' as shown on the sub-district versus overall map.	All	No change required to MSD/DSDFS.	Forwarded to DSDF Team.	
Headland Town Planners	External	In terms of very specific sites that are indicated on the "Structuring Open Space" maps, we still have reservations as to the efficacy of these maps, given the clear errors contained therein, in so far as they ignore conditions and/or approvals on the ground. Please note that the text in the district plans elevates these green spaces to "categories that may require deviation"; therefore it is absolutely critical that the data is correct, given that there are too many self-evident mis-categorisations in the mapping.	All	No change required to MSD/DSDFS.	Forwarded to DSDF Team.	
ACSA	External	ACSA notes the support afforded to the Cape Town International Airport and surrounds, in terms of the promotion of mixed- land uses that will elevate the airport's role. ACSA also notes and supports the recognition of the Cape Town International Airport as an important gateway and the associated need to enable future development by relocating informal settlements □	Tygerberg	No change required to MSD/DSDFS.	Forward ed to DSDF Team.	
ACSA	External	It may be helpful to highlight noise as an important consideration for residential developments in proximity to the Cape Town International Airport, to ensure compatible land use.	Tygerberg	No change required to MSD/DSDFS.	Forward ed to DSDF Team.	
ACSA	External	ACSA Notes and supports the relocation of informal settlements from harmful high noise zones. We wish to also highlight that this community will be impacted by the noise zones of the secondary parallel runway as well.	Tygerberg	No change required to MSD/DSDFS.	Forward ed to DSDF Team.	
ACSA	External	Airports Company South Africa supports the recognition of noise considerations. An error is noted : "residential uses are not recommended below 65 dBA contour. This should be above. Airports Company South Africa must be included as an interested and affected party, for future developments proposed close to CTIA (within a 1.5km radius). □	Tygerberg	No change required to MSD/DSDFS.	Forward ed to DSDF Team.	
ACSA	External	ACSA notes and supports the identification of a possible future rail link to CTIA. We also wish to call for the consolidation of rail plans to ensure overall integration and alignment with the CTIA rail reserve.	Tygerberg	No change required to MSD/DSDFS.	Forward ed to DSDF Team.	
ACSA	External	Industrial Development proposed close to CTIA is supported, especially in areas exposed to aircraft noise (noise levels higher than 55dBA).	Tygerberg	No change required to MSD/DSDFS.	Forward ed to DSDF Team.	
ACSA	External	ACSA supports the recognition that the site is not suitable for residential development, due to it being within the 65dBA aircraft noise contour and encourages the use of the site for non- residential mixed uses- as proposed.	Tygerberg	No change required to MSD/DSDFS.	Forward ed to DSDF Team.	
ACSA	External	ACSA supports the recognition that the site is not suitable for residential development, due to it being within the 65dBA aircraft noise contour and encourages the use of the site for non- residential mixed uses- as proposed.	Tygerberg	No change required to MSD/DSDFS.	Forward ed to DSDF Team.	
ACSA	External	The Airports Company South Africa supports the notion of reinforcing the location of the airport as a major economic generator within the city, improving connectivity and enabling airport growth for the benefit of the region and the local economy. The Airports Company South Africa supports the notion of ensuring the long- term sustainability of the Cape Town International Airport, by encouraging compatible land uses. We therefore acknowledge and support the relocation of Blikkiesdorp Temporary Residential Area (TRA) as well as Freedom Farm and Malawi Camp. The airport noise contours used to guide development must be those of the 'ultimate' airport development, taking the re- aligned runway and second runway into account. Therefore the Blikkiesdorp Temporary Area will also be severely impacted by the secondary runway.	Tygerberg	No change required to MSD/DSDFS.	Forward ed to DSDF Team.	
ACSA	External	The Airport's north east precinct referred to should be precinct 3 not precinct 2 as indicated.	Tygerberg	No change required to MSD/DSDFS.	Forward ed to DSDF Team.	
ACSA	External	The North east precinct should include the relocation of the residents of Malawi Camp and Blikkiesdorp.	Tygerberg	No change required to MSD/DSDFS.	Forward ed to DSDF Team.	
ACSA	External	The support and promotion of mixed used cargo logistics node development on ACSA's Northern precinct is acknowledged.	Tygerberg	No change required to MSD/DSDFS.	Forward ed to DSDF Team.	

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Private	External	I strongly oppose that the Weltevreden Wedge be used as low or medium density housing. The objective of the wedge is to protect the horticultural area. This protection should include the safety and security as the area as well. By placing low cost housing in that area, the PHA, that is already plagued by theft will be put further at risk. My suggestion for the Wedge is that it should be reserved for small scale farmers or any other agricultural activity, ie horse riding, petting zoo, educational facility etc.	Cape Flats	No change required to MSD.	Forward ed to DSDF Team.	
FoCVGB	External	As the primary planning document for current and future projects, the FoCVGB's involvement with the Draft MSDP, plays a vital role in the Constantia Valley in the upkeep, maintenance and implementation of projects associated with riverine, wetlands and Green Belts. The FoCVGB views the City as a partner in achieving the desired goals within open and natural spaces. However, this has of recent time been a difficult partnership with the City as there has been a poor record of involvement with City officials (other than Fay Howa) due to our emails being unanswered, and the uncoordinated (siloed) management system of the various City Departments involved with the greenbelts. Irregular mowing schedules further compound our frustrations, add to the shoddiness and neglected appearance of certain greenbelts and thus encourage vagrancy and squatting eg Doordrift Greenbelt. We implore the City to become more progressive and involved in coordinating their efforts with FoCVGB so as not to duplicate efforts and thus prevent unnecessary expenditure	DSDF	No change required to MSD.	Concerns are noted and comment will be forwarded to the Parks Department. However, the MSDF is a policy document and cannot unfortunately deal with the operational concerns raised.	
FoCVGB	External	The "vision statement" must include "heritage" to read "renowned for its natural, cultural and heritage beauty". And include "natural" to read "and, sustainable natural and urban areas". □	DSDF	Additions made to para 3.1 Vol I.	The vision is kept more generically to accompany the Council-approved IDP. Additional text have been added under Chapter 3 , Vol I.	Add: under partnerships... under mad made risks para.. Co-ordination focused on enhancing and optimising the world renowned natural, cultural and heritage value of Cape Town in a sustainable way.
FoCVGB	External	Page 16 of the MSDP provides for: that the Critical Natural Assets - the rivers, wetland, conservation areas within the urban edge must be included within this definition. The document does refer to protection as required but these areas are not given adequate recognition and protection.	MSDF	Amendments made to Table 4.3 in Vol I.	The CNAs is not visible on p.16 but on p.50 Vol I and as per the definitions document includes for Map 5d only the proclaimed conservation areas. This is also explained in Table 4.3 under the Critical Natural Assets Informants column. The critical natural assets guidelines implies that	CNA table can be expanded to include 2. Support the status quo land uses with land uses as limited by the DMS zoning category and suitable to support the agriculture and rural character of the area. This may include formal or informal open space which continues to protect and enhance conservation worthy land parcels not yet formally approved as statutory conservation areas or Core 1 Biodiversity.
FoCVGB	External	There is mention that buffers (relating to World Heritage Site/ formal protected areas - but this should include natural assets) are critical but not provided for in the document as part of the spatial vision. We refer particularly to protection measures for these areas within the urban edge.	DSDF	Amendments made to Table 4.3 in Vol I.	Amendments made to Table 4.3 in Vol I to highlight that certain buffer areas may also be available and conservation worthy.	
FoCVGB	External	Page 19: Page 19 includes that: Protected green network of core natural assets and open space areas - linking river systems and other open space corridors but this needs protection that is lacking in the document. In fact the Green Infrastructure Network GIN is about how development should take place and not whether it will be protected from development	DSDF	Amendments made to Table 4.3 in Vol I.	Amendments made to Table 4.3 in Vol I to highlight that certain buffer areas may also be available and conservation worthy.	
FoCVGB	External	Page 26 last paragraph refers to the GIN providing a degree on guidance on to "how" and not "whether or not". It must however be stressed that there are areas of riverine, wetland and green open spaces that require no development in order to protect those spaces and natural systems.	DSDF	No change required to MSD.	Table A1a highlights that all river systems especially those with 1:50 year flood line indications, are conservation worthy and should be protected from urban development. Additional and complicated application processes in terms of the National Environmental Management Act and the Water Act, ensure that development will be prohibited.	

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FoCVGB	External	It is of concern that Table 5 on page 28 does not specifically include Constantia rivers and wetlands, and conservation areas. Please include these in Table 5.	DSDf	No change required to MSDf.	Table 5 reflects the Sub-Strategies of the spatial Strategy 1 focussing on economic growth.	
FoCVGB	External	Page 31 table under Conservation and Biodiversity Priority Zone, we are very concerned that the Constantia rivers, wetlands (for example Pagasvlei and Grootbosrivier) and open spaces have not been listed in the Core 1 Protected and Conserved areas. The Core 1 areas should include the Constantia wetland areas. In fact the Core 1 areas should include all the rivers. In order for the City to be resilient these natural systems must be regarded as critical areas and not just open spaces, sports fields and storm water retention etc. as per Core 2 areas.	DSDf	No change required to MSDf.	Comments are a bit details but forwarded to DSDf Team.	
FoCVGB	External	Reference is made within the Constantia area of open spaces that are underutilized and appropriate for development. This is a misleading statement. The open spaces are well used and well supported by the public and residents.	MSDf	No change required to MSDf.	Forwarded to DSDf Team.	
FoCVGB	External	The GIN map on page 36 does not identify the Constantia Valley rivers and wetlands which is an omission. These areas need to be demarcated as important sites of biodiversity and worthy of protection. These are natural systems and must be recognised as such. These sites are after all irreplaceable.	MSDf	Minor changes to the map.	The legend of the MSDf GINet map has been modified to indicate that corridors are excluded from this map. They do not display properly if at all due to the scale. Please instead refer to the DSDfs GINet section for more detail.	
FoCVGB	External	Table 16 non-coastal based destinations should include the Alphen and Diepriver greenbelts and riverine areas. This is an important birding site for the growing tourism of birding as well as linked to the Alphen Hotel complex and continuing along the riverine areas to Honkenhort Hotel	Southern	No change required to MSDf.	Forwarded to DSDf Team.	
FoCVGB	External	Page 76 FoCVGB does not support the New Development area of SARDA for densified housing development and the loss of the green open space. This area provides a natural buffer to the built environment and should be maintain and enhanced as a green public space. It is further part of the green infrastructure network. The City purports to promote linkages between the riverine systems and open spaces. This must be implemented in this regard.	Southern	No change required to MSDf.	Forwarded to DSDf Team.	
FoCVGB	External	DMSP Volume 3 section 1.2.2 Environmental Infrastructure and Open Space System. It is encouraging that the City views the open space upgrading, enhancement and development as critical to achieving the vision of the district. FoCVGB is currently principally involved within the Urban Edge projects. Support from the City is vital for the success however, FoCVGB are routinely left unsupported where city officials and funding is not forth coming	Southern	No change required to MSDf.	Forwarded to DSDf Team.	
FoCVGB	External	The City has identified the Open Space System as critical however this needs to affirmed through actual implementation. Clear deliverable and site specific areas need to be listed in this section and FoCVGB is imminently suitable to provide the City with the necessary details to be recorded in the deliverable and implementation of the projects. Increasingly this role is falling on civil society to funds and resource. This needs further deliberation by the City	Southern	No change required to MSDf.	Forwarded to DSDf Team.	
Private	External	As a resident of Constantia I would like to object to the Densification in Constantia 1. It's a rural, historical area. This is why people come to live here. We don't need two or up to 3 buildings on properties as this will change the entire ambience and rural feeling of the area and increase the traffic load 2. Also 3 story buildings will compromise the resale value of adjacent properties as there will be a lack of privacy as they are over looked by neighbours and these homes can also cast shade on previously sunny areas...even swimming pools 3. Lack of greening – With houses so close many trees, which not only give the area is ambience but help us with shade and cleaning the air, will be felled and the biodiversity, that the council are now are trying to improve– re- not mowing verges and parks, will be challenged and lost. We need to maintain corridors for birds, leopard toads etc. 4. Densification will also lead to more hard landscaping – There MUST be a percentage of each property that allows for rain water to penetrate the ground and keep the ground water levels as they are - imagine if all the water from paved properties runs off onto the roads – there will be a problem with storm water drains which were not built to cope with such quantities and increasing flooding in winter.	Southern	No change required to MSDf.	Forwarded to DSDf Team.	

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FoCVGB	External	Table 8 has omitted all of the Constantia valley river, wetland and open spaces. These are critical areas and must be included. This may be part of the problem as to why the rehabilitation, indigenous plants and management of these areas are falling on the role of the public and civic organisations without the necessary support of the City.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
FoCVGB	External	It is of further concern that the City may be implementing the use of Open Spaces for mobile business operators – we implore the City to discuss such matters with CRRA and FoCVGB and to involve us in the deliberations on how this will be implemented, sites chosen, managed and policed (enforcement)...	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
FoCVGB	External	Table 8 has omitted all of the Constantia valley river, wetland and open spaces. These are critical areas and must be included. This may be part of the problem as to why the rehabilitation, indigenous plants and management of these areas are falling on the role of the public and civic organisations without the necessary support of the City.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
FoCVGB	External	Section 1.6 provides none of the necessary green infrastructure implementation mechanisms. This is detrimental and an omission and must be rectified. Environmental sustainability must be funded and resourced by the City. The City with its partner agreements to achieve environmental targets must prioritise funding and mechanisms to perform projects to meet these national and international agreements.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Wynberg Resident	External	Mistrust in both the City and Developers a. Track records of developers are very poor whereby there appears to be an attitude to build first and ask questions later. Latest example is at 5 Crane Close, Tokai. The developer is known to transgress and it appears that the City would rather have the residents take the legal route. These "Rogue Developers" appear to flout development laws and find the fine imposed cheaper than building according to agreed plans. Is this allowed by the inspectors from the City? This has to be stopped and the City inspectors have to also be held accountable if developments are not constructed to agreed plans. The Aldro in Wellington Avenue is another example whereby the City inspector did not do their job and the developer got away with the transgression. There are far too many of these transgressions and I cannot see that the City will enforce proper regulations under their new densification policies. b. The fast tracking of developments will surely allow more flouting of regulations and law. The only losers in this situation are the residents and not the City or the developers. It appears historically that the City will favour developers over residents at all times c. All residents in the immediate area have to be notified for developments appropriately and correctly. The City has a duty to protect resident's rights and not allow changes simply for the benefit for densification. d. Resident's rights to privacy are also superseded in favour of development. Will the City also take the best interests of the residents into account or simply bulldoze this densification through at all costs? Politically and morally? e. Have surveys compiled by the City for densification been done by an independent and unbiased company and will these stand up in the court of law? f. Looking through the IEC party funding it also appears that the DA receive donations from various developers. Is this not a red flag? How does the City keep this relationship at arm's length? Will developers be protected if they are donors to the ruling party? g. Will new developments have water saving and electricity saving measures built in as part of densification? Water and energy are two very scarce commodities and have to be taken into account in order for new developments to be approved	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Wynberg Resident	External	The City is in no position to densify the suburb of Wynberg at present. The suburb is old and the infrastructure is past its useful life. Before any densification is implemented changes have to be made: Water and sewerage; The area has continuous water problems and the water and sewerage pipes are consistently under repair throughout the suburb. If densification is to be implemented then the water system and sewerage system will have to be upgraded on a major scale. New developments in the area have created the breakages which highlight how delicate the infrastructure is. □	Southern	No change required to MSDF.	Forwarded to DSDF Team.	

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Wynberg Resident	External	Electricity: The overhead lines are also very old. Various poles are bending around the area. This is also a safety hazard, f densification is to happen I would expect the electricity infrastructure to be underground and be upgraded	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Wynberg Resident	External	Traffic: MyCity will not solve traffic issues in the area. The Metro Rail does not function either as an alternative.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Wynberg Resident	External	Protection of Green Areas. The Bridget O'Donoghue Assessment report for the MyCity route highlights concerns that the open areas are to be used appropriately and to be kept green. Will this now be disregarded? Developers build right up to the edge of the properties and do not allow for gardens any longer. Trees will be removed and the suburb will transform from a very leafy suburb to one of mere concrete. Will the open areas now be sold off for densification or kept as a green area	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Wynberg Resident	External	Problem/Slum Buildings: a. Wynberg has around 30 problem buildings on the register as per Councillor Emile Langenhoven. Surely the problem building situation has also to be sorted out before densification is implemented? Failure will create more problem buildings. b. Ebor Road and the surrounding area is a slum area with problem buildings on the City register. The City has done very little to clean the area up. The issues have been around since 2012 and nothing has changed. We are told continuously that the Uli Heydt building was under legal action and even Councillor Liz Brunette confirmed in 2019 that the matter was on the role of the High Court. Subsequently in a recent newspaper article an agreement was reached over the Uli Heydt building and then was then taken off the role in contradiction of what residents were told. This building needs to be taken over or demolished. c. Grand Central – is a development under the Leisure Group and is a cesspool of crime and grime. Appears that a proper body corporate is non-existent and lost control of their property. Will developers be allowed to develop and add to more buildings of this nature in your densification plans without concrete assurances that buildings will be managed with a proper functioning body corporate? d. How will the City prevent new developments from becoming a new crime and grime hotspot? □	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Wynberg Resident	External	Schooling a. The area attracts thousands of people to the area via the transport interchange system and having a court and hospital nearby. b. Presently only the interchange is prioritised for enforcement. c. Drug dealers deal openly without fear from SAPS or law enforcement throughout the suburb. How can this even be allowed to happen and for so long? d. Increased densification will be attractive for more drugs, prostitution, crime and grime	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Wynberg Resident	External	SAPS/Law Enforcement: a. Increased population size would have more strain on policing. We already do not have enough police officers by world standards. What mitigations have been put in place for more police officers? b. Wynberg has a Law Enforcement office yet one block away we have all the crime and grime. Are the officers intimidated and unable to perform their duties □	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	MAP indicating "Cape Winelands Cultural Landscape" inside the TMNP Protected Area, that is demarcated land of the Cape Floral Region Protected Areas. May I suggest that if there is no truth to this sectional indication, that this Map is immediately withdrawn and the expiring date extended with 14 calendar days	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	The following questions refer: Since when is the Cape Winelands Cultural Landscape part of the Cape Floral Region Protected Area? It only indicates the date of nomination in 2015	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	There seems to be NO indication on the UNESCO World Heritage Site relating to the Cape Winelands Cultural Landscape site on the internet.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	Where is this sectional and cultural inclusion announced? Is SANParks aware of this process? Where can the Authority in charge of the Cape Winelands Cultural Landscape be contacted? □	Southern	No change required to MSDF.	Forwarded to DSDF Team.	

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Private	External	Two key issues that Cape Town faces, growing informal settlements and water shortage, are not given enough consideration in the planning documents in my opinion	All	No change required to MSD/.	The City's Water Directorate has a Council approved Water Strategy (2019), an updated Water Services Plan (2022-2027). The Future Planning & Resilience Directorate has a Council approved Resilience Strategy (2019) as well as a Climate Change Strategy (2021). The Human Settlements Directorate has a Human Settlements Sector Plan (2022-2027). All of these documents cover multiple actions related to water scarcity and addressing the human settlement challenges in Cape Town. Refer to Technical Supplement D, Vol II of the MSD/.	City of Cape Town: Document Centre: Water Services Plan p.30 of TS D, Human Settlements Plan 2013-2014 needs to be replaced with the HS Strategy (2021), HS Sector Plan (2022-2027) and HS implementation Plan (in process) City of Cape Town Document Centre: Human
Private	External	Informal Settlements: These have been expanding and I see little to suggest that there is a plan that looks at significantly improving living conditions in these settlements. There seems to be more focus on developing high density housing along the major transport routes around the metro. I would like to see more planning that accepts the reality that the growth of informal settlements is inevitable, and deals with it as an integral part of our City in the future.	All	No change required to MSD/.	The Human Settlements Directorate has a Human Settlements Sector Plan (2022-2027). All of these documents cover multiple actions related to addressing the human settlement challenges in Cape Town. Refer to Technical Supplement D, Vol II of the MSD/.	City of Cape Town Document Centre: Human Settlement Sector Plan
Private	External	Spatial planning should make provisions for more water storage, such that new builds must include such things as rain-water catchment, storage and reticulation, grey-water facilities (possibly with rudimentary treatment), air-cooling requirements for air-conditioning in new office builds and other water-saving and storage plans. Central water storage facilities should be planned along with areas earmarked for new development. This needs to receive priority now, and needs to be integrated with development planning, and as part of future building regulations. . With suitable planning for water storage the planned concentration of development along the various corridors can be adjusted to allow for more parks and gardens as part of the development. Barren cement landscape is not a desirable outcome and can be mitigated by such early planning. □	All	No change required to MSD/.	The City's Water Directorate has a Council approved Water Strategy (2019), an updated Water Services Plan (2022-2027) and the Future Planning & Resilience has a Council approved Resilience Strategy (2019) as well as a Climate Change Strategy (2021). All of these documents cover multiple actions related to water scarcity in Cape Town. Refer to Technical Supplement D, Vol II of the MSD/.	City of Cape Town: Document Centre: Water Services Plan
Private	External	Lastly, waste disposal and land fill is a pressing issue that receives mention in the documents. The City's waste management plan, in my opinion, seems over-optimistic. A goal has been set for reducing solid waste to landfill by as much as 50% by introducing informal waste-pickers as part of the solution. The City needs to make it easier, if not compulsory for people to recycle. For example, door-to-door collection of recyclable material and central sorting areas for waste-pickers might be a more efficient system to build in to future spatial planning. I am aware that there are pilot projects in some suburbs where the City collects recycling from households, but this needs to progress rapidly to cover more areas as soon as possible.	All	No change required to MSD/.	The City's Waste Department has an Integrated Waste Management Plan (2017-2022) which will be under review.	City of Cape Town Document Centre: Integrated Waste Management Plan
Private	External	The historic wine farms in the Constantia Valley that are world-renowned heritage sites which form the matrix of Constantia's cultural landscape and Constantia's many other historic buildings and sites are not acknowledged in the City's vision statement for Constantia. This omission in the City's vision statement should be remedied.	Southern	No change required to MSD/.	Forwarded to DSD/ Team.	
Private	External	The trajectory and visible changes brought about by the City's commitment to densify Constantia is the greatest threat to the special character of Constantia There are immediate local impacts on residents. Aging and inadequate electricity, water, sewerage etc. infrastructures, noise, privacy and visual intrusion all materially and negatively impact on the environment and on the public.	Southern	No change required to MSD/.	Forwarded to DSD/ Team.	
Private	External	The notion of investment incentives for the Film Industry as mooted in subsection 1.6.6.c of the Technical Report Volume 3 requires comment. This vague notion poses many questions eg, who would be the recipients of investment incentives and for what purpose? If the incentives are intended for investors to establish film studios in the City, then how does this fall in line with the City allowing owners of residential properties to use their properties for commercial filming in residential areas in direct competition with investors who invest in purpose built film studios in and around Cape Town? Film shoots are promoted by the City of Cape Town at the expense of significantly increasing negative impacts on neighbours which also compromise the integrity of residential areas.	Southern	No change required to MSD/.	Forwarded to DSD/ Team.	

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Private	External	In the Technical Report Volume 3 subsection 1.6.6.b heritage exemptions are mooted for the Tokai area as appears on the map Fig 11. This is of concern given that Steenberg Farm, one of the oldest historic farms in the Constantia Tokai Valley is located in Tokai and for this reason alone heritage exemptions as envisaged in this document cannot be supported. Environmental exclusions are mooted in subsection 1.6.6.a and the same comment applies.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Atlas Stadsbeplanning / Town Planning	External	There is an in principle agreement with the City's Human settlement directorate for an in principle support for the Urban Edge being amended to include Cape Farm 724 portion 20 because it is ideal for future development of affordable housing opportunities and associated amenities in various densities. The City is presently developing over 5000 housing opportunities in the adjacent properties in partnership with the land owner Garden Cities therefore Farm 724 portion 20 would be a viable extension for future development.	Northern	Minor change to MSDF.	Please refer to UDE Report.	
Private	External	Hiermee skryf ek Wilfred Kohn n groente produsent in Philippi , my misnoe uit teen enige verdere ongewenste formele nedersettings in die sogenaamde Philippi Wedg , dit is die grond tussen Weltevreden en Jake Gerwel rylaan . Ons het alreeds die onwettige Esoqaula nedersetting wat vir ons baie probleme besorg met paaië blokeer en elektrisiteit diefstal . Ek is heeltemal daarteen dat Prassa sy probleem ons probleem wil maak , om hierdie mense wat op die spoor lyn plak , hier na ons landbou gebied te verskuif. By voorbaat dank	Cape Flats	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	I strongly object to the New Development Area proposed for Fish Hoek at the sports grounds on Nelson Road. Reasons: - This site provides affordable (possibly free – not sure) soccer fields that are visited by residents from surrounding neighbourhoods quite a distance away. These surrounding neighbourhoods clearly then have no such green spaces at all. It therefore has a huge "catchment" area.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	We have numerous issues in Bexhill Road and the immediate vicinity along the railway line. The Yusufeyah Mosque, a place of worship is being targeted by your 'tent owners' who have more rights than we as rate payers. Comparing Wynberg East with Hatfield village and why we have not received the same protection. You have caused more harm to South Africans than the last 30years. Growing up and still living in Wynberg is discussing what you have done to our area, environment and our once beautiful country. Stop this crime . Yes it's a crime of densification of Wynberg and you will be held accountable for it. A once proud South African	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	I would like to stress my feelings that I am totally shocked that Wynberg should be considered in this manner. As much as I am very aware that we need more houses, I would also like to know why Hatfield has received protection against densification? It really makes one wonder. As a 3rd generation Wynberg resident for 62 years, I cannot imagine an influx of additional people, when the area is already bursting at the seams! We sincerely hope that the idea of densification in Wynberg does NOT take place, as I'd love for my grandchild (who is 4th generation on our property), to grow up here, which hopefully returns to the beautiful, safe environment it was as when I grew up.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	I would like to place an objection to the (future) proposed development of the above mentioned facilities. These are the only facilities for adult and open (as opposed to school) ball sport in the deep south area. The Massi soccer field has been used for housing after the recent fire and their soccer teams are also using these facilities as well as impromptu groups later in the evening and over weekends. These fields are not "underutilized" as claimed. They are all used by the various sporting groups every week. The Fish Hoek sport umbrella does not represent all those who enjoy these open public spaces and should not speak for everyone else.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Noordhoek Ratepayers	External	MSDF vol 1: Page 28 (map 2d): Why are Noordhoek, Poespaskraal and Imhoff's Gift not mentioned as historic settlements (all three were created in 1743)? All three settlements have various valuable heritage contributions	Southern		DUBBLE ENTRY	

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Noordhoek Ratepayers	External	MSDF vol1: Page 28 (map 2d): Why are Noordhoek, Poespaskraal and Imhoff's Gift not mentioned as historic settlements (all three were created in 1743)? All three settlements have various valuable heritage contributions	Southern	Corrections included in map	Noted. This will be addressed (bearing in mind that Vol1 is purely an informant document and the focus is now almost entirely on ensuring the Vol.2 report to be approved is as good as possible). Poespaskraal, Imhoffs Gift and Noordhoek have their origins in historical farms. The heritage resources in around these three areas are mapped and accessible via the Heritage Inventory which is published on the City of Cape Town Map Viewer. In this map, 'historic settlement' refers to historical villages.	
Noordhoek Ratepayers	External	MSDF vol1 With an ever advancing and increasing densification we are adamant that the Noordhoek common, the Noordhoek Nature Sanctuary and the Noordhoek greenbelts (between Noordhoek Main Road and Silvermine Road in CroXer's Valley, and between Silvermine Road and the mountains in Noordhaven and San Michel) must be designated as Critical Natural Assets as they provide essential natural spaces for residents as well as corridors for the animals to move from mountain to wetlands and back. Map with erf numbers can be provided if required.	Southern	Check with Biodiversity	The critical natural assets as reflected on Map 4.1 p 54 of the MSDF Vol I is only reflecting formally and statutorily protected conservation areas. Other conservation worthy areas are reflected on Map 5 B and the GIN reflects land parcels which plays an important ecological role, but do not necessarily have to be protected by law or declared as nature reserves.	
Noordhoek Ratepayers	External	MSDF vol1 Page 68 (table 5.4): we are happy to read:Development of coastal economic and social opportunities must be undertaken in a manner that does not reduce, harm or degrade the coastal environment or its ability to cope with climate risks in the future. However, we seek clarification of the term "coastal environment", so that it is possible to apply the definition consistently across the SDF. The term is currently used as a very loosely. Houmoed Phase 1 extension will seriously harm and degrade the coastal environment in terms of ecosystem services etc., but it is still in the Southern District SDF	Southern	No change to MSDF required.	Forwarded to DSDF Team.	
Noordhoek Ratepayers	External	MSDF vol1 And further on page 69: it reads - Ensure the conservation, maintenance, and restoration of coastal dunes, floodplains, wetlands, river corridors, and riparian habitats in order to ensure that the green infrastructure function that these perform in terms of flood attenuation and climate change risk reduction are preserved. Consideration should be given the surrounding areas because anything that gets developed around dunes, wetlands, riparian habitats etc. will impact them. We would like the text to mention that all developments that would impact the wellbeing of these natural spaces will not be allowed in the surrounding area – the Imhoff's Gift massive development is an example that will impact the wetland, toads, caracal corridor etc. etc.	Southern	Minor change to MSDF text.	The suggestion is too detailed to be included here but the text has been updated.	
Noordhoek Ratepayers	External	MSDF vol1: Refer to our comment about green spaces on page 54, which we believe should include Noordhoek Nature Sanctuary and the Noordhoek greenbelts (between Noordhoek Main Road and Silvermine Road in CroXer's Valley, and between Silvermine Road and the mountains in Noordhaven and San Michel) • The Green Infrastructure Network (GINet) has been developed based on mapping open spaces, in relation to a range of ecosystem services that they provide. Questions that relate to ecosystem services were considered for each space identified and the space evaluated accordingly.	Southern	No change required to MSDF.	The Critical Natural Assets as reflected on Map 4.1 p 54 of the MSDF Vol I are comprised of Protected and Conservation Areas, irreplaceable Core 1 Critical Biodiversity Areas found outside of designated New Development Areas, Philippi Horticultural Area, land seaward of the Coastal Edge, and mountainous areas performing an agriculturally-significant, Biodiversity or catchment function. Other conservation worthy areas are reflected on Map 5b. If the comment refers to the Green Infrastructure Network (GINet) as reflected on Maps 2d and 5g and to the Chapman's Peak Nature Sanctuary, this Sanctuary is considered part of the GINet but due to the map scale, the feature is partially obscured by overlapping detail on the map. The missing greenbelts have been added in to the GINet. However, they are not shown on the MSDF maps as they do not display at this map scale.	
Noordhoek Ratepayers	External	MSDF vol1 Page 77: The Coastal Edge should be extended to include Docke's Farm (Erf 4835, Chapman's Peak) since it falls within the area at risk of flooding. As can be seen in the inundation map produced by CoCT, erf 4835 (highlighted in green) is at similar significant risk as the properties to the West which fall on the seaward side of the coastal edge (red line). This is logical if one considers that the low lying Vlei is located on the property.	Southern	MSDF will await improved Coastal Edge once updated version is gazetted	There is an acknowledged that the coastal edge of the gazetted coastal edge is a problem in this area but that does not change the development vision for this area. The information was forwarded to the Coastal Management Department who is the owner of the coastal edge from a technical point of view.	
Noordhoek Ratepayers	External	MSDF Vol 1: Page 142 (Policy 9): Densification should take into consideration other (conflicting) policies and must not automatically override these, since densification in an area of tourism value or natural heritage will automatically reduce its potential.	Southern	No change required to MSDF.	The policy statement does not give automatic rights for densification as existing land use rights and contextual informants are taken into consideration. Furthermore the statements identifies further detail as to differentiated guidelines for densification that remain subject to consistency with the MPB- L S99.	
Noordhoek Ratepayers	External	We seek clarification of the term "proactive enhancement of development rights". These should be considered on a case-by-case basis depending on the nature of the area and the impact of these rights on the rights of other people that live in the community, and the rights of nature. Please be more specific here regarding under what circumstances enhancement of development rights would be applicable. CoCT should not only consider visual impact and sea level rise here, but also the SDGs (Sustainable Development Goals).	Southern	No change required to MSDF.	SPLUMA provides the legislative framework sets out that a land use scheme must be consistent with the MSDF and proactive rezoning and enhancement of development of rights is embedded within the MPBL. e.g. rezoning for road infrastructure, engineering infrastructure. The determination of these rights will be subject to being consistent with the MSDF with consideration to all future costs to all parties in the provision of engineering and social services.	

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Noordhoek Ratepayers	External	MSDP Vol 1: Page 156 (Policy 23) "Support incremental land use intensification provided by the Municipal Planning By-Law to secure a 2nd & 3rd dwelling unit per Single Residential Zoning 1: Conventional Housing (SR1) zoned erven". There is tension between this statement and the building lines as dictated by the MPB-L. The wish to density should not lead to automatic support for building line encroachment. It should be clarified in this policy statement that the owner/developer needs to exhaust all possibilities to build these extra dwellings without encroaching the building lines before requesting an exemption under the MPB-L.	Southern	No change required to MSDP.	Building lines are managed via the MPB-L processes and consultation with neighbours are generally part of the process followed prior to approval.	
Noordhoek Ratepayers	External	Southern District SDF Vol 1: Page 12 (3.1.3.3 Avifauna): The oystercatchers that nest on Noordhoek long beach at the lagoon next to the Kakapo wreck should be mentioned here under the important roost and breeding sites. CoCT should work together with SANParks to protect areas where important populations of non- or less threatened species are under pressure because of escalating human activity, such as oystercatchers, flamingos and terns on Noordhoek Beach. These should be mentioned separately from the population at De Kom. Protection should be given to species within the city's boundaries, instead of focusing on the protection of remote nesting areas.	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Southern District SDF Vol 1: Page 12 (3.1.3.4 Amphibian fauna): The comprehensive assessment mentioned needs to be done as part of the EIA. With the Houmoed extension the EAP suggested that the assessment/study should be done after approval, which is absurd. The reference to a "comprehensive assessment" is too vague - this needs to include mention of amphibian experts that do a population study over 5 years, check water, noise, and pollution levels, study impact of surrounding traffic and impact on the broader biodiversity in the area. A full habitat study should also be conducted. All mitigation and adaptation need to be tested for efficacy as part of the study. Two additional areas important for the Western Leopard Toads not mentioned here are Milkwood Park and Sun Valley. Importantly there should also be building specifications that are toad proof. Fencing with access holes, swimming pools that are raised or have beached sides.	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Southern District SDF Vol 1: Page 30 (table 16): policies column is empty	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Southern District SDF Vol 1: Page 31 (figure 18): The urban and coastal edges in the beach area of Noordhoek are not clear in figure 18. It seems as if the urban edge is going around erven 4833 and 4834, while both are outside the Coastal edge. This is not possible for obvious reasons. All erven outside the Coastal edge cannot be within the Urban Edge. As mentioned above in the comment for page 77 of the MSDP Vol 1, the Coastal Edge should be extended to include Docke's Farm (Erf 4835, Chapman's Peak) since it falls within the area at risk of flooding.	Southern	MSDP will await improved Coastal Edge once updated version is gazetted	There is an acknowledged that the coastal edge of the gazetted coastal edge is a problem in this area but that does not change the development vision for this area. The information was forwarded to the Coastal Management Department who is the owner of the coastal edge from a technical point of view.	
Noordhoek Ratepayers	External	Southern District SDF Vol 1: Page 32 (figure 19): Docke's farm (Erf 4835, Chapman's Peak) should be added to the list of "areas of agricultural significance and be labelled with a brown edge, similar to Cape Point Vineyards. Also, Noordhoek has many smallholding plots, which are essential to the equine lifestyle and of which some are being used for small scale farming of vegetables. The local production of vegetables is expected to increase with the increasing effects of climate change and the reduction in food security. These should be demarcated as such on the map so that they can be treated as the asset that they are.	Southern	No change required to MSDP.	Areas identified as 'areas of agricultural significance' in the District Plan (& MSDP) are an information layer received from Dept Agriculture Western Cape resulting from periodic assessments of what constitutes such across the municipal area. This site was not included (ie. identified as of agric significance) in the last assessment made (in 2017), whereas the Cape Point vineyards area was (& was also in the earlier 2008 assessment). See below for further response on Docke farm. Re- equine and vegetable smallholdings areas within the urban edge the draft District Plan has recognised these as an equestrian / equine area of significance and recommended that further subdivisions within this area generally not be supported. Although this farm has been in existence for many years, from a district spatial planning perspective it is not considered an area to necessarily protect as agriculture area into the long term future. It is outside the urban edge but within an essentially wetlands area (the 'Noordhoek wetlands'), is itself substantially wetland area, and is surrounded to the east, west and south by proclaimed Cape Peninsula Floral Kingdom World Heritage Site buffer areas. Area south and east of the site is owned by SANParks and CoCT (& the latter managed by SANParks). As such Docke farm may continue into the future as farm area but may be more appropriately conservation area. Department of Agriculture suggested that preservation of biodiversity (wetland) is likely higher priority than the current agriculture, although agriculture can continue as long as it can be done in a sustainable manner. □	

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Noordhoek Ratepayers	External	Southern District SDF Vol 1: Page 33 (3.4.1.1): Missing reference to the migratory routes between mountain and wetland as well as between the various parts of the national park. These are being increasingly cut off for transition of wildlife. Additional corridors must be created to allow wildlife to move between mountain and wetland (landscape is experiencing increased fragmentation), and also the roads are a death trap for them so the corridors need to be wildlife friendly with wildlife crossings and connective zones.	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Southern District SDF Vol 1: Page 33 (3.4.1.2): Missing reference to uncontrolled usage of wellpoint and borehole resources that is leading to depletion of groundwater resources. Developments that risk impacting aquifers should be avoided. Missing reference to uncontrolled damming of streams and rivers for irrigation leading to depletion of wetland recharging like in De Goede Hoop Estate. This places significant pressure on the biodiversity and wetland during droughts which are likely to become more frequent.	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Southern District SDF Vol 1 Page 34 (3.4.1.3.v): Missing reference to: - the increased risk of fires as a result of climate change and the increased fuel load of alien vegetation that will lead to bigger and more intense fires - increased poaching of wildlife in coastal wetlands (Noordhoek wetlands point in case) and specifically around informal settlements - Marine animal poaching and plant poaching - Roads that intercept wildlife corridors and subsequent road-kill/animal mortalities - Noise and water pollution that impact the wildlife habitat and ability to breed and survive - Land borne sewerage and litter that enter the ocean - Use of poisons like Glyphosate that has a devastating impact on humans, but also on animals and the wetland (Wilkinson, 1999)	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Southern District SDF Vol 1: Page 39 (4.1.2): The document should mention the restrictions of local area overlays that form part of the MPBL. The document must mention that subdivisions affect what the land can be used for. City animal by-laws dictate that a property must be at least 4 000 m2 for horses to be held. The equine economy is a major component of the Noordhoek economy.	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Southern District SDF Vol 1: We strongly object to the categorisation of the Noordhoek sanctuary, the open horse fields on Silvermine Road (erf 4744 and 4745-RE, Silvermine Road) and Phase 8 of Lake Michelle as "Underutilised". These areas fulfil important social and ecological roles in the Noordhoek valley. The term "underutilised" is dangerous, anthropocentric and subjective.	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Southern District SDF Vol 1: Page 60 (5.4.4.1): Differentiation should be made in the Houmoed extensions phase 1 and phase 2. While phase 2 can be argued to be relevant, while Houmoed phase 1 was planned to alleviate congestion as a result of works on Kommetjie road, but this has since been completed. Instead it will have a devastating impact on the wetland and its fauna. The alternative, which is to open up Sunnydale Road is more cost effective. Why is this not mentioned as option?	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Southern District SDF Vol 1: Page 60 5.4.4.2 if OuKaapse Weg will be widened then tunnels for wildlife will have to be created in order to meet the requirement of providing pathways between various sections of TMNP as stated in the MSDP policies.	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Southern District SDF Vol 1: Page 85 (Table 5.6) It cannot be stressed enough that the MPBL already allows for densification through the second and third (SR1) dwelling provision. The density guideline correctly points out "provided no external departures are required". No further development of open areas should be allowed as these are crucial to the population of Cape Town. Too often the densification policy is abused (unfortunately successfully) to allow for subdivisions that are applied for purely for financial gain – since no densification is achieved, or for departures, when alternative designs allow for densification within building lines. Both these abuses must be addressed in the policy in order to prevent senseless subdivisions and infill.	Southern	No change required to MSDP.	Forwarded to DSDP Team.	

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Noordhoek Ratepayers	External	Southern SDF Vol 2 Page 21 (figure 8): Cape Point Vineyards (CA-934-1-RE) and Docke's farm (Erf 4835, Chapman's Peak) are not mentioned as agricultural zone, while these are key agricultural areas in Noordhoek. Please amend.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Noordhoek Ratepayers	External	Southern SDF Vol 2: Page 25 (figure 10) We have the following comments on this figure (see also the attached section included below): The Coastal Edge should be extended to include Docke's Farm (Erf 4835, Chapman's Peak) since it falls within the area at risk of flooding. See the map that we referenced in our comment on page 77 of MSDF Vol 1	Southern	MSDF will await improved Coastal Edge once updated version is gazetted	There is an acknowledged that the coastal edge of the gazetted coastal edge is a problem in this area but that does not change the development vision for this area. The information was forwarded to the Coastal Management Department who is the owner of the coastal edge from a technical point of view.	
Noordhoek Ratepayers	External	Southern SDF Vol 2 Docke's farm (Erf 4835, Chapman's Peak) is an area of agricultural significance and must be labelled as such in the map, being one of the few remaining working farms in the valley. It matches the criteria mentioned on page 34 "High potential and unique agricultural land include areas that have been ploughed for orchards, vineyards, forestry plantations, annual crops, pastures and irrigations lands. Intensive agricultural land shall be protected against conversion to other land uses, particularly urban development, unless otherwise argued in the district plan."	Southern	No change required to MSDF.	Areas identified as 'areas of agricultural significance' in the District Plan (& MSDF) are an information layer received from Dept Agriculture Western Cape resulting from periodic assessments of what constitutes such across the municipal area. This site was not included (ie. identified as of agric significance) in the last assessment made (in 2017), whereas the Cape Point vineyards area was (& was also in the earlier 2008 assessment). See below for further response on Docke farm. Re- equine and vegetable smallholdings areas within the urban edge the draft District Plan has recognised these as an equestrian / equine area of significance and recommended that further subdivisions within this area generally not be supported. Although this farm has been in existence for many years, from a district spatial planning perspective it is not considered an area to necessarily protect as agriculture area into the long term future. It is outside the urban edge but within an essentially wetlands area (the 'Noordhoek wetlands'), is itself substantially wetland area, and is surrounded to the east, west and south by proclaimed Cape Peninsula Floral Kingdom World Heritage Site buffer areas. Area south and east of the site is owned by SANParks and CoCT (& the latter managed by SANParks). As such Docke farm may continue into the future as farm area but may be more appropriately conservation area. Department of Agriculture suggested that preservation of biodiversity (wetland) is likely higher priority than the current agriculture, although agriculture can continue as long as it can be done in a sustainable manner. □	
Noordhoek Ratepayers	External	Southern SDF Vol 2: The urban edge is incorrectly going around erven 4833 and 4834-RE, while both are outside the Coastal edge. If this is related to the colour of the line then this should be drawn more clearly. It is technically not possible to have an urban edge that extends further seawards than the coastal edge. As clearly stated in the Coastal policy on page 29 "No urban development seaward of the coastal edge line unless it enhances public amenity and recreational value and that such development is consistent with the principles and objectives contained in the Integrated Coastal Management Act.". Further, on page 63 "Land on the seaward side of the coastal edge line (i.e. within the Coastal Protection Zone) should not be used for any urban development normally associated with, and accommodated within, city development."	Southern	Urban Development and Coastal Edge corrected	There is an acknowledged that the coastal edge of the gazetted coastal edge is a problem in this area but that does not change the development vision for this area. The information was forwarded to the Coastal Management Department who is the owner of the coastal edge from a technical point of view.	
Noordhoek Ratepayers	External	Southern SDF Vol 2: There is no "existing urban development" to the East of the Urban edge on the mountain side (mistake in the map that must be corrected)	Southern	Urban Development and Coastal Edge corrected	Urban Development and Coastal Edge corrected and improved.	
Noordhoek Ratepayers	External	Southern SDF Vol 2: Why is the open horse field in Noordhoek (erf 4744 and 4745-RE, Silvermine Road) designated as New Development Area? While the Generations school was approved against the wishes of the community it should not automatically lead to the remainder also being developed. This open field contributes directly to the character of the area. Furthermore, current densification allowances within the MPBL already allow for considerable densification without the need for sacrifice of more open land. We would like erf 4744 and 4745-RE to be removed from the list of NDA	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Noordhoek Ratepayers	External	Southern SDF Vol 2: Why is phase 8 of Lake Michelle designated as New Development Area? The development of this piece is extremely contentious from an environmental point of view and is opposed by residents of Lake Michelle and Noordhoek. The reason for this opposition lies in the natural value of this piece of land and its importance as a passage of all water coming from the Houmoed ponds through Lake Michelle and into Papkuilsvei (Docke Farm). SANParks in their comment (Vol 4 appendix 13) support this as well. The unique environmental value of this piece of land should not be sacrificed for another 100 dwellings.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	

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Noordhoek Ratepayers	External	Southern SDF Vol 2: How is it possible that there is a New Development Area next to Masi outside the Urban Edge that extends into the Noordhoek Wetland? We realise that this is where shacks have been built illegally, but that does not automatically mean that it should become a NDA.	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Page 28 (Table 5) The Noordhoek Wetlands and Papekuisvlei should be listed under "Rivers, wetlands and their associated buffers"	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Page 93 (figure 18): Same comments as for figure 10. The coastal edge has been omitted in the figure but is crucial in the context of other information on the map	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Page 96 (supporting development guideline 14) The text leaves too much room for development to take place outside the coastal edge. Table 5.4 of the MSDP clearly states: "Urban development is precluded from the seaward side of the coastal edge in instances where coastal processes and the need to protect sensitive coastal ecosystems are the primary informants for which the position of the coastal edge has been defined for a specific area."	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	In our opinion guideline 14 should clearly underline the MSDP policy that residential development outside the coastal edge is not possible. Re-development of existing structures could happen under the limitations stated: "Any redevelopment within the identified coastal flood risk areas must address potential flooding associated with predicted sea-level rise and increased storm-surge action, as well as windblown sand issues where this applies."	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Page 96 (supporting development guideline 17). What is meant by "Development on adjacent properties should be encouraged to assist with the former (re- setbacks, street furniture etc.)." ? This text seems to encourage development on adjacent properties, which should not be the intent. We propose to change the text to: "Development on adjacent properties to scenic routes should support the former (re- setbacks, street furniture etc.)."	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Noordhoek Ratepayers	External	Page 98 + 99 (r. Noordhoek Silvermine specific comments : See attached table submitted as part of the original comments	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Private	External	My concern and comment are the open spaces being looked at for development. The Cape Floristic Region is one of the most biodiverse regions in the world and is further subdivided into vegetation types, some of which have been built over quite dramatically. Certain species can only live in particular regions to which they have adapted and habitat loss has put many species on the endangered red list. Ottery Field is a contested area for environmental and construction development, the latter would be a mistake. This is both from an ecological point of view and a construction point of view. Ottery Field is a seasonal wetland within the Zeekoe catchment area and falls within the Cape Flats Sand Fynbos (CFSF) vegetation type. The area has a historical range of 547 km2 but now only 77.0 km2 remains and only 1% is conserved or managed. Ottery Field is in a prime position to be protected for the species it does have, including some endangered species, as well as being rehabilitated to become better than its current degraded state. Ottery Field gets saturated with water, especially in years with good rain, you have to wear wellington boots just to get across some sections, not great for building on. I do have photos and videos of the water levels on the field	Cape Flats	No change required to MSDP.	Forwarded to DSDP Team.	
Private	External	I would like to register my opposition to this proposal as this has selected a specific area for devaluation of existing properties. If it goes ahead property owners should be compensated and rates reduced ☐	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Private	External	I would like to raise is that while the necessity of densification is understood, I believe there needs to be a proper understanding of traffic flow and also the redirection of traffic. If not studied properly and done properly, the resulting buildings will cause traffic congestion and severely impair property values of current owners. There have also recently been cases of buildings which do not adhere to the zoning requirements and regulations. If this is to be done in a positive and productive manner, better attention needs to be given to the process. Should you wish to invite further more detailed comment, please do so using this email.	Southern	No change required to MSDP.	Forwarded to DSDP Team.	
Subcouncil 19 - Area South	Internal	Sub-council 19 does not support the use of erf 17775 Kommetjie Main Road Sunnydale (4,6ha) for high density housing but rather for a wide range of Health, Social, Law Enforcement and Community Services.	Southern	No change required to MSDP.	Forwarded to DSDP Team.	

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Subcouncil 19 - Area South	Internal	The Far South Peninsula suffers from a wide range of social ills including rape, arson, murder, gangsterism, extortion, poaching, drug dealing, muggings, gang shootings, sexual abuse, gender-based violence, child abuse, elder abuse, substance abuse (drugs and alcohol), homelessness, vandalism, overcrowding, poverty, hunger and unemployment. From a Spatial Planning perspective the sub-council believes that the need for a social services hub, accessible to the communities of Masiphumelele and Ocean View, is more important than the need for residential housing which can be accommodated at a number of alternative sites already identified for housing.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	We are totally against the densification of Wynberg. It seems like the city does not give a damn about their actions and the consequences thereof. This is an historic area keep it intact. Don't destroy that.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	I strongly disagree to densification.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	It was and is still very distressing to learn of this plan. There are many concerns regarding this project which including its affect on property values, noise, traffic, safety, cleanliness. It's shocking that COCT would move hundreds of people into an already compact area. The traffic is already so terrible and this will make it worse. Main road cannot be widened and the M5 isn't getting any more lanes soon. It's not like the N1 or N2 that has many arteries flowing into it and directly to CT. Thousands of people will be affected by an already severely constrained traffic system. Adding a my city bus route is not enough. Is there really no where else that these building can be erected where there is already cleared land and there isn't building that need to be demolished? It's shockingly stupid and it will not have the effect you are expecting. I completely disagree with this development and I shocked and saddened by the city's logic. The DA has gone mad if they think this is a solution. □	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	As residents of the historical village of Wynberg, we have great concerns regarding the proposed increased load on our infrastructure, services and security. We are struggling with the current pressure so we cannot even imagine what increased traffic (foot and vehicle) will do to this area. The municipality cannot provide something as basic as speed humps or traffic control in our current situation. We have to spend money on private security as the city cannot police our area. Citizens are responsible for their own safety and the apprehension of criminals who are then handed over to SAPS. Why would densification be considered if the current situation cannot be managed? The concept of successful increased densification does therefore not sound achievable.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	We, as residents in Wynberg, are deeply concerned regarding the issue of densification. While we understand that densification reduces the use of green buildings, we believe that if densification is to take place in the residential areas the apartments should Not be higher than two storeys hig. Have space for indigenous gardens to allow the Cape Rain Frog to thrive, Architecture of building should be consistent with the architecture of Wynberg. More densification means high traffic congestions, More densification means higher criminality	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	We totally object to the densification of Upper Wynberg (west of Main Rd), especially Chelsea Village and Wellington Ave/Mortimer Rd - the school traffic every morning is already dangerous. And the character of this heritage area will be ruined with buildings over 3 (three) storeys being allowed!	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Isandla Institute	External	The MSDF fails to acknowledge that informal settlement growth is part of a larger housing insecurity continuum, and that Covid-19 has fundamentally affected housing insecurity. The City's delayed, lack of or inappropriate policy responses and programmes with regard to homelessness, backyard housing, transitional housing, social housing (particularly, land release) and inclusionary housing, have all contributed towards the growth in informal settlements. In addition, the lack of contextually appropriate policy, support and enabling regulatory conditions has not been put in place in low-income areas and informal settlements to enable self-build housing, where much can be done within the mandate of local government, but ultimately with required support from provincial and national government	MSDF	No change required to MSDF.	The 2022 MSDF rests on the 2050 Land Use Model, which is based fundamentally on an acknowledgement that Cape Town's long term growth will be driven by informality and informal development demand. The MSDF plays a limited role in this human settlements development process. However, MSDF Policy Statement 25 supports the enablement of a range of housing typologies and models to increase supply to the Cape Town housing market. The DSDF Implementation Frameworks give effect to the Human Settlement Land Assembly Strategy by supporting a long term land assembly programme through the identification of potential new development areas (NDAs) at varying densities and supporting a variety of housing interventions. Please refer to the Human Settlements Implementation Strategy and Implementation plans approved by the City	City of Cape Town Document Centre: Human Settlements

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Isandla Institute	External	The City's delayed, lack of or inappropriate policy responses and programmes with regard to homelessness, backyard housing, transitional housing, social housing (particularly, land release) and inclusionary housing, have all contributed towards the growth in informal settlements. In addition, the lack of contextually appropriate policy, support and enabling regulatory conditions has not been put in place in low-income areas and informal settlements to enable self-build housing, where much can be done within the mandate of local government, but ultimately with required support from provincial and national government.	MSDF	No change required to MSDF.	The City's Human Settlement Strategy and Implementation Plan gives strategic and operational direction and priorities. It also includes programme approaches and the implementation focus. The MSDF cannot reflect that to more detail than currently available.	man
Isandla Institute	External	On page 23, in the spatial context, challenges and opportunities section, the report states that in-migration, as well as internal growth in informal settlements, were responsible for increased numbers of unlawful land occupations, particularly between 2018 and 2021 and exacerbated by the Covid-19 pandemic, and mostly on state-owned land unsuitable for human settlement or identified for land and housing programmes. However, these statements confirm that the City fails to acknowledge that informal settlement growth is part of a larger housing insecurity continuum, and that increased socio-economic vulnerability during the pandemic has led to large numbers of (former) backyard dwellers being involved in these land occupations.	MSDF	No change required to MSDF.	Noted but the City's new term of office IDP contains many operational programmes addressing the housing needs.	City of Cape Town IDP 2022-2027
Isandla Institute	External	The report goes on to state that less formal/informal dwelling types will contribute around half of all new dwellings until 2040, and that this holds far-reaching consequences for the city in terms of service delivery, health and safety aspects related to buildings and living conditions, and the provision of social facilities. However, the response to this context needs to acknowledge the housing insecurity continuum, and be holistic and facilitate tenure security, access to basic services, and create an enabling and support environment for self-build housing construction. As a first step in this direction, it is good to see a focus in the MSDF, brought through from the IDP, on small-scale rental / micro unit development programmes.	MSDF	No change required to MSDF.	Noted. The Human Settlements Strategy (2021-22) as well as the Implementation Plan will give further insight into the City's approaches.	City of Cape Town Document Centre: Human Settlements City of Cape Town new IDP Programmes on Human Settlements
Isandla Institute	External	Socio-economic vulnerability is mapped using the CSIR COVID-19 vulnerability index, rather than a more appropriate indicator, such as safety/insecurity. Map 2c on page 27 of the MSDF maps socio-economic vulnerability using the CSIR COVID-19 vulnerability index, which has a particular shorter-term and health-oriented lens (including risk of/susceptibility to transmission of COVID-19). It would have been more useful to use an appropriate indicator that reflects broader and longer term socio-economic vulnerability.	MSDF	No change required to MSDF.	The Socio-Economic Index is explained in Technical Supplement F, Vol II of the MSDF p 82-86. The data is only available to the city at the lowest level once the national census is completed. The updated information since 2011, are expected in 2023-24. A comprehensive metro-wide index is not recalculated outside the census or national context and the COVID index was considered the best possible selection of risk areas available. District specific crime statistics are in the Background documents of the different DSDFs.	
Isandla Institute	External	In addition, as further elaborated on under 3, given the endemic nature of crime and violence in the city (with poorer and under-serviced areas being disproportionately affected), it is surprising that this does not feature in section 2 of the MSDF – including a map of the spatial distribution of violence and crime.	MSDF	No change required to MSDF.	Crime prevalence is closely related to the socio-economic patterns in the city. The Mayoral Urban Regeneration Programme (MURP) is run under the leadership of the Executive Director of Spatial Planning & Environment. Crime prevention through built environment improvements, is one of the focus areas and the City's Urban Design Branch, together with District Spatial Planning work closely with the MURP colleagues. Operational teams implement a wide range of projects in association with the City's Directorate of Safety & Security. The MSDF cannot go into details wrt crime spots as data will age too quickly. The MURP programme's products are reported in the media from time to time. Crime statistics are monitored and reported on annually as part of the Circular 88 outcome indicators in the IDP Document.	City of Cape Town Document Centre: IDP socio-economic information p 34
Isandla Institute	External	An insufficient focus on safety and crime and violence prevention beyond a narrow focus on policing. Drawing from the IDP, the MSDF recognises that safety is one key component of 'the city of hope' that Cape Town seeks to become. Yet, safety is not clearly expressed as a strategic spatial development priority or spatial strategy. It is somewhat implied in spatial strategy 3, but it is not explicitly articulated.	MSDF	No change required to MSDF.	The Mayoral Urban Regeneration Programme (MURP) is run under the leadership of the Executive Director of Spatial Planning & Environment. Crime prevention through built environment improvements, is one of the focus areas and the City's Urban Design Branch, together with District Spatial Planning work closely with the MURP colleagues. Operational teams implement a wide range of projects in association with the City's Directorate of Safety & Security. The MSDF cannot go into details wrt crime spots as data will age too quickly. The MURP programme's products are reported in the media from time to time.	City of Cape Town Document Centre: MURP
Isandla Institute	External	The MSDF does not contain any maps spatializing crime and violence, and does not sufficiently acknowledge the spatial manifestation of crime, and the resultant need for a spatially targeted and built environment response. Responses need to be evidence-based and outcome-focused, and have a spatial focus on crime and violence	MSDF	No change required to MSDF.	The MSDF cannot go into details wrt crime spots as data will age too quickly. The Socio-Economic Index is explained in Technical Supplement F, Vol II of the MSDF p 82-86. The data is only available to the city at the lowest level once the national census is completed. The updated information is expected in 2023-24. District specific crime statistics are in the Background documents of the different DSDFs. Crime statistics are monitored and reported on annually as part of the Circular 88 outcome indicators in the IDP Document.	City of Cape Town Document Centre: MURP

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Isandla Institute	External	No attention given to opportunities for partnering with CSOs, CBOs and community-based structures On page 33, the report notes that the MSDF's spatial vision involves the City committing to, among others, working in partnership with the private and public sector. However, no mention is made of partnering with CSOs, CBOs and community-based structures (e.g. in terms of informal settlement upgrading or self-build housing support, but also in terms of area-based violence prevention), through which local solutions can be found to seemingly intractable problems. The Western Cape Informal Settlement Support Programme (ISSP)2 (2016) demonstrates the value of partnering with CSOs in informal settlement upgrading, using a Partnership Framework Agreement to leverage their expertise. The City's technocratic approach is also reflected in the disempowering approach taken in the public participation approach to feedback on this final draft of the MSDF, which, despite having undergone more direct prior community engagement, particularly in the DSDF review process, still remains inaccessible to the majority of the City's residents.	MSDF	No change required to MSDF except Tech Suppl B to be slightly updated.	Refer to Technical Supplement D, Vol II of the MSDF for a summary of the City's Human Settlements Strategy and the Action/ Implementation Plan reflecting approaches to amongst others, the essence of partnerships. Suggestions will be forwarded to Human Settlements Directorate.	City of Cape Town Document Centre: Human Settlements City of Cape Town new IDP Programmes on Human Settlements
Isandla Institute	External	Alternative responses required to informal settlement densities, in terms of service provision and fire risk. In the section on enabling the City's climate change commitments (p16), it is stated that in terms of adaptation and resilience, a key strategic focus area includes working to reduce the incidence and impact of fire within informal settlements and at the urban/natural interface. However, informal settlement density presents a fire risk, so one element of the solution needs to be denser top-structure construction (in the form of semi-detached or two to three storey structures) that minimises the number of households that need to be relocated in order to install access and service infrastructure and frees up space between structures. A good example of a denser incremental structure typology is the 'LIFT' House typology (Light-weight, Improved, Fire-safe, Timber-frame), developed in eThekweni in 2020, as part of the iQhaza Lethu project in collaboration with the HSRC in 2019/2020.3 The typology is a response to the need for a more appropriate building technology for steep, densely populated and well-located informal settlements in order to optimise scarce land, open up space for services and create distances between structures to improve fire safety, and to enable residents to improve their own housing over time.	MSDF	No change required to MSDF except Tech Suppl B to be slightly updated.	Refer to Technical Supplement D, Vol II of the MSDF for a summary of the City's Human Settlements Strategy and the Action/ Implementation Plan reflecting approaches to amongst others, re informal settlement upgrades. Suggestions will be forwarded to Human Settlements Directorate.	City of Cape Town Document Centre: Human Settlements City of Cape Town new IDP Programmes on Human Settlements
Isandla Institute	External	The need for better data collection, and more contextually appropriate compliance incentivisation and enabling support for self-build, incremental housing consolidation. The MSDF remains silent on how the City can enable and support the incremental development of housing in informal settlements through self-build. While this is indicative of a broader policy question that national and provincial government need to address, the City has enabling, supportive, regulatory and advocacy functions at its disposal to support the construction of dignified and safe shelter by and for local residents. The MSDF must be clear on what the spatial planning and land use management tools are that can enable self-build, to complement existing tools such as SR2 zoning	MSDF	No change to MSDF required.	The incremental upgrading of Areas of Informality is part of the Human Settlements Strategy and Implementation Plan and lays out the practical arrangements, focus areas and timelines.	
Isandla Institute	External	Lack of accuracy in projecting informal land use demand, apparent abdication of responsibility for managing informal growth, and a missed opportunity to support self-build housing consolidation. On page 36 in Table 3.2: 2018 baseline demand versus 2040 projection, it is stated that the total land use demand for residential is projected to increase by 41% by 2040, with informal residential unit demand projected to increase by 80% over this period. This large projected increase indicates that over the next 20 years, the City is potentially abdicating responsibility for facilitating the provision of the vast majority of housing demand, and having little to no regulatory control over 80% of future land use over this period. It must be highlighted, and the City has acknowledged, that there is lack of accuracy in capturing current informal residential growth, and therefore using current data as a basis for such long term projections, combined with the volatility of informal residential growth due to myriad complex factors now and into the future, is ill-advised.	MSDF	No change required to MSDF.	The Land Use Model is a scenario planning effort aimed at the estimation of potential residential and non-residential land uses. The 2019/20 model's focus was to assume a pro-poor and low economic growth trajectory. The LUM estimated the potential impact of this scenario on the City. None of the previous rounds of land use modelling have ever assumed such a low economic growth over a 20 year period. The last rounds of the Land Use Model (2013-2015) considered 4 scenarios focus on variations to TOD, density and the continuation of the housing financing regime of the time. The 2019/20 scenario abolished the principle of state subsidised housing programmes in the near future.	

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Isandla Institute	External	This large projected increase in informal land use demand also assumes no improvement in reducing the growth rate of informal housing through increased informal settlement upgrading and support for self-build housing consolidation on serviced sites; backyard housing formalisation; and small-scale rental and micro-development. In addition, the report projects a 2040 average residential density of 25 dwelling units per hectare (du/Ha) gross across the metro, which conveniently aligns with the 2012 Densification Policy's city-wide densification target of 25 du/H, which is a minimum level of urban land use efficiency and, by extension, service and resource efficiency.	MSDF	No change required to MSDF.	The Land Use Model is a scenario planning effort aimed at the estimation of potential residential and non-residential land uses. The 2019/20 model's focus was to assume a pro-poor and low economic growth trajectory. The LUM estimated the potential impact of this scenario on the City. None of the previous rounds of land use modelling have ever assumed such a low economic growth over a 20 year period. The last rounds of the Land Use Model (2013-2015) considered 4 scenarios focus on variations to TOD, density and the continuation of the housing financing regime of the time. The 2019/20 scenario abolished the principle of state subsidised housing programmes in the near future.	
Isandla Institute	External	The report goes on to state that the Land Use Model (LUM) projections for 2040 assume that residential demand is to be serviced from currently vacant and under-utilised land parcels identified as New Development Areas (NDAs) in the District SDFs, as well as through incremental densification in the form of additional dwelling units (formal or informal). It pleasingly notes that this requires, among others, unlocking significant parcels of vacant land; and planning, coordinating and implementing key bulk engineering infrastructure, enhancing basic service delivery provision in existing areas of informality and areas containing backyard or small scale rental units.	MSDF	No change required to MSDF.	Comment noted.	
Isandla Institute	External	In terms of Table 5.6: Differentiated intensification guidelines, on page 85, the report helpfully states that development typologies should be pursued that facilitate the formalisation of existing areas of informality, expand on formalisation of informality (e.g., via small scale rental / micro units / boarding house units), but then worryingly goes on to state that the City should "potentially consider de-densification needs in informal settlements, where necessary (especially for disaster management reasons)". De-densification should be the very last option, and then only for disaster management reasons, or for minimal relocation due to space requirements for basic services provision. There also appears to be a lack of overt support for incremental housing consolidation (via self-build) in informal areas and backyard dwellings.	MSDF	Minor change to the MSDF text.	It was resolved that the category of incremental intensification be deleted as there are no specific intensification guidelines identified, which are not already vested within the MPBL DMS. De-densification policy statements in table 5.6 will also be deleted as these are to be considered on a case-by-case basis where the need exists.	
Isandla Institute	External	Initiatives in support of backyard rental landlords and small-scale developers are welcomed, as both provide vital access to affordable rental accommodation. However, these initiatives will only benefit a relatively small proportion of backyard tenants and landlords, and as such cannot be a dominating focus – not least because there are significant opportunities to support self-build in informal settlements. The MSDF recommends (p115) that incentives be created to enable the delivery of affordable housing by the private sector; however, there needs to be more urgency in this respect, given the broad agreement that the private sector needs to play an important role, and the lack of appropriate policy or incentive development to date.	MSDF	No change required to MSDF.	There is a separate programme managed under the ED Spatial Planning & Environment with multiple workstreams and actions which cannot be included in the MSDF as policy document. Comments will be forwarded to relevant department.	City of Cape Town Document Centre: Human Settlements City of Cape Town new IDP Programmes on Human Settlements
Isandla Institute	External	On page 103, the report discusses the Priority Human Settlements and Housing Development Areas (PHSHDAs), which focus on funding in-situ upgrading of informal settlements and new developments. However, the City's informal settlement upgrading project pipeline is not spatialised anywhere in the MSDF. While there may be concerns regarding the release of this information, a high-level indication is required for accountability and could play an important part in guiding private and public investment in these areas, which is a key role of the MSDF.	MSDF	No change required to MSDF.	The District SDFs have maps in the Implementation Chapter containing the location of all Human Settlement projects by the Province and the City. The MSDF highlights and reference the programmes in the IDP. Reporting to the public on the progression of project implementation against targets set is in the IDP Annual Report which are publicly. The Human Settlements Sector Plan is also publicly available to illustrate and explain all the different projects by the line department.	City of Cape Town new IDP Programmes on Human Settlements
Isandla Institute	External	In terms of sewer reticulation (p113), the report states that "in areas of high density and increasing informality, frequent blocking of sewers with foreign objects results in sewer spills, creating a health hazard for communities". This point echoes an argument the City frequently raises in discussions around Cape Town's sewage problems, placing the blame for blockages on low-income residents dumping objects into drains not built for such purposes. While this may indeed be a real issue, there is no certainty around the degree to which this behaviour contributes to overall strain on the system. Furthermore, it deflects from a more holistic and honest debate about municipal responsibility for providing adequate solid waste removal services in those neighbourhoods.	MSDF	No change required to MSDF.	The MSDF and DSDFs as spatial plans cannot direct the operational plans of sector-specific line departments or their communication or educational programmes. Comments and suggestions have been forwarded to the relevant department.	Waste Management

DEPARTMENT/ ORGANISATION	INTERNAL/ EXTERNAL	SUMMARY COMMENT	DISTRICT	CHANGES MADE ON THE MSDF/DSDFS	RESPONSE	COMMENTS FORWARDED TO <DEPT> NAME OR LINK TO DOCUMENTS ON WEB
Isandla Institute	External	The MSDF contains a regular rider of "where infrastructure capacity allows", but this cannot be a hard constraint, as more focus must be put on system-level interventions, including real emphasis on alternative technologies and community-driven solutions. ⁴ More needs to be done about taking an interdisciplinary approach to infrastructure. One purpose of an MSDF is to coordinate an interdisciplinary approach to space, and what this means at a local level in terms infrastructure; learning to navigate limitations needs to be explored, otherwise a vital opportunity is missed.	MSDF	No change required to MSDF.	Strategic approaches such as alternative technologies and community-driven solutions are available from the different Engineering Departments' Strategy Documents (available publicly on the web). Further details are also available in the sector-specific Sector Plan which explains the projects, priorities and larger programmes. The MSDF cannot completely integrate the wide variety of approaches for as long as it does not have a spatial implication. Suggestions forwarded to department.	Water and Sanitation, Electricity and Waste
Isandla Institute	External	the definition and focus of these areas is too much on vulnerability rather than also a focus on the opportunity they represent in terms of support to small-businesses, and the opportunity for building on existing social capital, and individual and community agency.	All	Minor amendment to MSDF Text.	Redefined Urban Support Areas and Development Focus Areas based on the definition provided by District Mechanism unit, DSDF Team.	
Isandla Institute	External	Larger shifts in the Urban Development Edge (UDE), and specifically NDAs that are located on but still inside the UDE are a tacit acknowledgement that the focus on densification of formal areas has not been successful (and equates to giving in to market pressures, rather than taking a stand on densification), and that greenfields serviced sites are being made provision for on the urban periphery, which will not advance spatial transformation.	All	No change required to MSDF.	The pro-active enlargement of the urban development edge has been applied in only a handful locations. The remainder of the urban development edge is in relation to the May 2016 cadastral version, which again was closely aligned and similar to the 2012 version.	
Isandla Institute	External	Lack of detail on support to township businesses and economies in the policy focus on transformation and integration of informal settlements and marginalised areas. These policy intentions are all to be welcomed as they commit to extending service provision, shift the focus towards partnering in participatory in-situ upgrading, and create some of the enabling conditions for self-build top-structure consolidation. However, much of the MSDF focuses on more formal areas, and there is a lack of detail on how the City could enable township businesses and economies through a more flexible and facilitative environment, provision of small business-zoned erven, assisting with the setting up of community cooperatives, and support and training for small-scale building contractors. This aligns with Policy 3: Introduce land use policy reform and mechanisms that will support the development and growth of small businesses and township economies (both formal and less formal), on p138 of the MSDF. Inclusion means more than improving transport accessibility to opportunities, and the spatial planning and land use management tools that can enable economic inclusion in less formal contexts, beyond informal trading, need to be made clear.	MSDF	Minor adjustment to MSDF text.	Adjustments to Policy 26. Although some of the suggestions regarding informal business facilitation and expansion are within the implementation space and operations of the Enterprise & Investment the City. Proposals forwarded to relevant department.	Enterprise & Investment Department
Isandla Institute	External	With respect to the MSDF's commitment to extending service provision to backyard dwellings, concern must be reiterated regarding a statement in the City's IDP that "[i]t will ensure that each property is connected to water, sanitation and electricity, with the property owner carrying the responsibility for the further connections and infrastructure required on the property to provide services to additional dwellings" (p38). This commitment does not go far enough, and the City is obfuscating in its response to backyard dwellers. Isandla Institute has procured a legal opinion from Senior Counsel ⁵ , which is clear that there is no legal obstacle in the Municipal Finance Management Act, and other pertinent legislation, that prevents municipalities from fulfilling their legal obligation to provide access to basic services to backyard residents on private land. The legal opinion concludes that municipalities have both the power and the responsibility to do so. It is therefore incumbent upon the City to develop a policy response to the provision of basic services to backyard residents on private land, and to revise its performance target in line with existing need.	MSDF	No change required to MSDF.	Concerns regarding the IDP statement on division of responsibilities regarding services to backyarders are forwarded to services as well as the IDP Office.	IDP Office and Engineering services (to backyarders)
Isandla Institute	External	Attention to the local food system is positive, but the MSDF should be more concerned with distributional matters related to access, affordability and nutritional outcomes	All	No change required to MSDF.	The mentioned matters are beyond the scope of the legal requirements for the MSDF as per SPLUMA and the MPB-Las the focus is on operational and strategy matters.	
Policy and Strategy Department	Internal	I focussed on the socio-economic data and its interpretation – please see some general comments below and specific comments in the document itself. In general, there are two areas of general focus: The LUM2040 interpretation and data is not always consistent across the document(s), and the final residential growth estimate of August 2020. Refer to the original submission and see specific comments in the pdf documents	MSDF	Minor adjustment to MSDF text.	Corrections made.	

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Isandla Institute	External	The draft MSD/ does not provide enough clarity on how the City will decide on and manage the necessary trade-offs, and how performance will be measured, whilst ambitious in tone, the draft MSD/ as with the IDP, is lacking in specificity with respect to how trade-offs will be navigated and how performance will be measured. The MSD/’s monitoring and evaluation framework needs to measure progress towards its own transformational objectives, so as not to be seen as merely an aspirational document – with adherence consequently optional or subjective. For example, progress in terms of spatial transformation needs to measure, among others, incremental consolidation of top structures in informal settlements, and backyard and micro-development, as these are an important element of spatial and socio-economic transformation that the City of Cape Town needs to facilitate.	All	MSD/ chapter has been updated	Monitoring and Evaluation part of the MSD/ has been aligned with the DSDF. There is a separate Spatial Trends Report which report on the changes in the built environment. These indicators will be considered in the future as soon as data sources can be established.	
Policy and Strategy Department	Internal	MSD/Vol 1 pg 23: This paragraph should be aligned to the technical document and the data needs to be correct, thus suggest changing it to "Cape Town population is expected to exceed 5.8 million people by 2040 based on the City's base projection. Population growth rates have been decelerating, and is expected to continue this trend, while household size has been decreasing. Possible changes in this trend due to Covid-19 will be closely monitored. Household sizes have decreased from 3.5 in 2011 to 3.2 people per household in 2016, with implications for housing supply. It is now estimated that 35 000 housing opportunities must be supplied each year, over 20 years, to meet the current backlog."	MSD/	Minor adjustment to MSD/ text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSD/ Vol 1: ap 2c: Suggest using the City's Socio-Economic Index for Cape Town as is used in the technical supplement.	MSD/	Minor adjustment to MSD/ text.	Updated Technical Supplement.	x
Policy and Strategy Department	Internal	These figures do not completely align to the Residential Growth Estimate of August 2020. There seems to be something wrong with it, especially with the informal units.	MSD/	Minor adjustment to MSD/ text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	This table doesn't correspond to table B3 and neither to the Residential Growth Estimate from August 2020.	MSD/	Minor adjustment to MSD/ text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	The previously sent comments, and updated data and text are not incorporated across the document, with some areas the graphs updated but not the text.	MSD/	Minor adjustment to MSD/ text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSD/ Vol 2: Consider changing the language - this could be confused with ADI/ADFs.	MSD/	Minor adjustment to MSD/ text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSD/ Vol 2: This table is different to the table 3.2 - something looks wrong here or is labeled wrong. Suggest checking to ensure accuracy against the Residential Growth Estimate of August 2020.	MSD/	Minor adjustment to MSD/ text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSD/ Vol 2: Where does that analysis stem from? Not clear, and not necessarily true. Is it the largest population per growth rate that is referred to here as the growth rate is decelerating? Please specify and verify with the RA team.	MSD/	Minor adjustment to MSD/ text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSD/ Vol 2: Need bullet point about COVID impact that need to be monitored. Consider adding "Possible changes in these trends due to Covid-19 is being monitored, with better data expected to be forthcoming with the 2022 Census and related data releases from 2023 onwards."	MSD/	Minor adjustment to MSD/ text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSD/ Vol 2: The paragraph is not incorrect, it's just not updated with the information data and the text sent in January 2022.	MSD/	Minor adjustment to MSD/ text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSD/ Vol 2: This was not updated with the information we sent in January 2022 and Not all of the labels are visible. Diagram F3 correct heading and source dates to 2021 not 2020	MSD/	Minor adjustment to MSD/ text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSD/ Vol 2: First paragraph Page 78: These figures are not aligned to what is on the map - are these figures for Western Cape?	MSD/	Minor adjustment to MSD/ text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSD/ Vol 2: Map F2 : Map is cut off - can't see the dates for Cape Town.	MSD/	Minor adjustment to MSD/ text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSD/ Vol 2: This table, especially this column, is not the same as what we sent - seems like it wasn't fully updated with the 2021 data we sent in January.	MSD/	Minor adjustment to MSD/ text.	Updated Technical Supplement.	

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Policy and Strategy Department	Internal	MSDF VOL 2: Correct heading source date Should be 2021 and not 2020.	MSDF	Minor adjustment to MSDF text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSDF Vol 2: Second last paragraph correct date quoted Should be 2021 and not 202	MSDF	Minor adjustment to MSDF text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSDF Vol 2 Pge 81 3rd paragraph: This line needs to be updated to 2021, i.e. "In 2021, there were an estimated 1.46 million households in Cape Town."	MSDF	Minor adjustment to MSDF text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSDF Vol 2: Suggest using two decimals - will also align better with the graph below.	MSDF	Minor adjustment to MSDF text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSDF Vol 2: Pg 84 Please check previous input we gave - this does not align fully with the categories and the sentence is confusing. What is happening here? This is a point/stock variable and do not state anything about growing or not growing.	MSDF	Minor adjustment to MSDF text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSDF Vol 2: Map F3: As per previous comments, asked to use "better looking" map which was discussed with the team - please reach out to the Research Branch if comment is unclear.	MSDF	Minor adjustment to MSDF text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSDF Vol 2: Pg 86: Health This section has not been updated with the data and text provided in January 2022. Education: Same, this section has not been updated with the data and text provided in January 2022.	MSDF	Minor adjustment to MSDF text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSDF Vol 2: Pg 115 This should be 53% See comment on table 3.2 - there is something wrong with it, and also with this sentence. This sentence thus only makes sense if MRIBH is excluded from informal (then its 46% and should be stated clearly). I have also highlighted this as an issue in my previous comments. The LUM narrative is not consistent nor accurate across the document.	MSDF	Minor adjustment to MSDF text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSDF Vol 2: Diagram F34 correct the date of source to include 2018	MSDF	Minor adjustment to MSDF text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSDF Vol 2: Pg 127 informal housing: My previous comments on 2022/05/19 has not been taken into consideration, and there are parts that need to be fixed.	MSDF	Minor adjustment to MSDF text.	Updated Technical Supplement.	
Policy and Strategy Department	Internal	MSDF Vol 2: Pg 127 Table F4: As per my previous comments: This is not the latest information according to me - please check with Jeffrey and Susan as I believe these numbers have changes. Definitions need to be provided - these categories aren't intuitive. Also suggest: Phrase as estimates of number of structures, Reference year needs to be added to table heading. Suggest be clear who's count it is and what method used	MSDF	Minor adjustment to MSDF text.	Updated Technical Supplement.	
SARDA	External	In order to retain the core unique and internationally (economically) desirable rural and semi-rural character areas and landscape qualities in ... Constantia,... development related recommendations should apply."1.2 The vision and related provisions are the spatial development objectives for the area. The area has unique character and is a distinctive area of rural, green and lower density suburban Cape-ness. These provisions must be the guiding principles and requirements considered for any land use or other planning applications and City development policy. The City's vision for Constantia, as set forth above is to conserve the character of the Constantia Valley. However this vision is not carried through and is instead being disregarded in land use applications approval processes. Adherence to the City's vision for Constantia vision is critical to sustain tourism and the irreplaceable heritage components contained thin the valley which is of significant economic and job creation value	Southern	No change required to MSDF.	Forwarded comment to DSDF Team.	

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SARDA	External	SARDA has a unique and rich heritage, nestled in the Constantia Valley within a rural, green and lower density area. The City's proposal to densify and transform SARDA into a higher density residential suburb comprising erfs smaller than surrounding areas is not in keeping with the spatial development objectives for the area. The proposal to transform a green open space into paved densified housing is not supported in the spatial logic of the area. The City's plan for turning the area into a higher density residential area is not in keeping with the surrounding area, in fact the DMSDP is detracting from the distinctive and unique area as required by the MSDF. The Constantia scenic routes, tourism destinations, arcadian residential areas, greenbelts, rivers and wetlands and such, are important as key drivers in the tourism and related job creation that the City of Cape Town enjoys. However the character and appeal of the area which brings much needed economic benefit is currently being degraded. Fulfilment of the densification policy of three dwellings per single residential erf and triple storey buildings is resulting in an incremental change in the character of Constantia thereby doing irreparable harm to and erosion of its distinctive rural, green and low density sense of place	Southern	No change required to MSDF.	Forwarded comment to DSDF Team.	
SARDA	External	The agricultural heritage landscape extends in addition to the heritage areas associated with small growers of strawberries and flowers and is relevant to the agrarian heritage of SARDA, the small Post Office/Police Station on Constantia Main Road and the surrounding areas with remnants of the history of earlier small growers' plantings (now mature fruit trees still in existence in Constantia greenbelts and wetland areas) and some derelict remains of their homesteads. The importance and celebration of "places of memory" is totally lost in the City's proposal. There is no plan for enhancement or maintenance of the heritage of the rural, distinctive and unique character for Constantia in the City's proposal.	Southern	No change required to MSDF.	Forwarded comment to DSDF Team.	
SARDA	External	This area and properties are significant to the sensitive ecological biodiversity corridors. Sub-division and densification in this area significantly reduces the biodiversity buffer zones which the DMSDP states needs to be protected and afforded with formal protection. This is a buffer zone required to ensure the ecological and biodiversity integrity on which the resilience of the City depends. To remove the buffer zone is undoing the essential requirements of ecological resilience critical to sustainable City functioning, achieving City carbon targets and environmental commitments in terms of international and national agreements.	Southern	No change required to MSDF.	Forwarded comment to DSDF Team.	
SARDA	External	Page 52 of DMSDP Southern, Volume 3: Implementation Plan section 1.1 Approach to implementation states the following: Ease of process: Removing red tape and improving institutional efficiencies by withdrawing contradictory or overlapping local planning policy with the approval of the DSDF (section 1.5) in line with strategic planning initiatives to provide certainty and transparency to developers and businesses. The residents, ratepayers and public have been excluded from the above clause. This is un-ashameably biased towards developers and profiteering from property development.	Southern	No change required to MSDF.	Forwarded comment to DSDF Team.	
Private	External	I'm not in favour of the rapid densification and intensification in Wynberg. It does not make sense to build low cost housing in the upper Wynberg area where the land is expensive and already over developed with very little open land. There is open land all along the N1 closer to Cape town and Century City which is much more suitable for this project.	Southern	No change required to MSDF.	Forwarded comment to DSDF Team.	

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SARDA	External	The DMSDP proposes for mechanisms that are underway for investigation in the Southern District such as DMSDP Implementation Plan s1.6.6 Environmental requirements exclusion (providing an overlay on the area inclusive of sensitive ecological and biodiversity areas) which allow for exemption from EIA regulation requirements in terms of the National Environmental Management Act 107 1998; Heritage exemptions for exemption from section 34 and 38 heritage trigger activities in terms of the National Heritage Resources Act no 25 of 1999; and Investment incentives are provided for development incentive mechanisms at discounted development charges, exemption of development application fees and discounted electricity fees. This is clearly unlawful preferential treatment at the expense of the residents of Constantia at the very least. The approval process will be administered through the City Investment Incentives Policy Unit for approval including the land use application approval – in particular filming has been identified for this special privileged application treatment. All of these mechanisms apply in Constantia and no less for SARDA. There is concern regarding the provisions of the DMSDP volume 4 Investment Facilitation Unit and its policies that allow for industrial commercial activities in residential areas such as Constantia to circumvent the rights of residents to the enjoyment of their property as upheld in the Constitution	Southern	No change required to MSDP.	Forwarded comment to DSDP Team.	
SARDA	External	The DMSDP is proposing to further its densification with incentives such the Density Bonus will be implemented. The following on page 52 of DMSDP Southern District Volume 3 Implementation Plan states: Density bonus: A 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. It is intended to compensate the developer with additional revenue from the 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 the development of a public good. This incentive is due to be implemented within the next 2 years. The proposed Density Bonus incentive scheme must be reviewed, set aside and altogether abolished from the suite of incentives the City is offering developers in order to achieve its densification objectives. This perverse incentive will have devastating consequences for Constantia and its unique character. The exemption provisions: environmental, heritage, zoning, and investment incentives for commercial priority tertiary sectors detailed in item 1.9 must also be set aside. The rights of the residents and ratepayers must be upheld and not undermined in residential areas	Southern	No change required to MSDP.	Forwarded comment to DSDP Team.	
SARDA	External	The Constantia area is a heritage agricultural landscape area with several farms still in existence producing exceptional viticulture within the Cape Wine Farms. SARDA is no different from an agricultural perspective. In addition, there is currently a small boutique vineyard on the Le Marais property adjacent to SARDA. These viticulture parcels of land all contribute to the Cape Wine Farms but are not acknowledge as such by the City. The DMSDP states to "Discourage further sub-division of agricultural land". This must be adhered to with regards to SARDA and the surrounding viticulture	Southern	No change required to MSDP.	Forwarded comment to DSDP Team.	
SARDA	External	Section 3.1.2 of the DMSDP states "Create a more sustainable economy: build on the district's primary competitive advantage by supporting development of the massive local, national and international visitorship economic opportunities within the district. Also create increased urban agriculture and small enterprise opportunities, especially in the more isolated (less accessible) parts of the district."	Southern	No change required to MSDP.	Forwarded comment to DSDP Team.	
SARDA	External	In section 3.2.3 the DMSDP states that: Spatial Concepts and Structuring Elements, Natural Assets "Urban development must respect the presence, role and function of natural assets, and should make the most of the possible benefits residents and visitors can derive from them". The figures supplied in the document however omit to include the total area of Constantia. The agricultural potential extends within the SARDA, Alphen and Honhenhort areas too. This omission contributes to a distorted impression and devalues the real and potential value of the SARDA area. This must be corrected.	Southern	No change required to MSDP.	Forwarded comment to DSDP Team.	

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SARDA	External	The SARDA erven, and Brommersvlei Road are part of the scenic route proximity area with mature trees of stature and direct linkage to Rhodes Drive and Constantia Main Roads. It is an important tourist and scenic area and being on route to Kirstenbosch Gardens via Hohenhort Road and Rhodes Drive. These areas are not suitable for densified residential housing which will detract from the scenic routes which are of tourism value to the economy of Cape Town and the character of Constantia.	Southern	No change required to MSDP.	Forwarded comment to DSDP Team.	
SARDA	External	SARDA is not close to amenities of economic and commercial centres and therefore it not conducive to strategic nodes of transport and development which supports the densification of areas. This is therefore not an area suitable for intensive development as proposed in the DMSDP.	Southern	No change required to MSDP.	Forwarded comment to DSDP Team.	
SARDA	External	The SARDA Support group therefore strongly objects to the DMSDP 2022. SARDA must remain Constantia public and open space, and be enhanced and maintained to the benefit in the service of the community of Cape Town, in celebration of a place of memory, a vital green and ecological lung and distinctive in its heritage and landscape.	Southern	No change required to MSDP.	Forwarded comment to DSDP Team.	
Planning Partners	External	Given that the MSDP has a 5-year review cycle, and its definitions are cemented at the beginning of its cycle, it is considered essential that the MSDP contains a definition of "affordable housing" that recognises the impacts of inflation (and, if possible, construction costs). If inflation is not taken into consideration in the definition of "affordable housing" then there will be practical implications for private developers that are required to provide affordable housing in private development schemes as a requirement of conditions of land use approval. For example, the River Club development in Observatory is subject to the following condition of rezoning approval: "At least 20% of the residential floor space shall be set aside for affordable housing, as defined in the MSDP." A definition based solely on National Subsidy criteria is therefore not considered appropriate in the case of private sector developments, but rather it is the affordability of accommodation in real terms that should be accommodated. The practical necessity of having an inflation-adjusted cut-off point is critical, especially where rental stock is involved. However, if an inflation accommodating definition is not adopted in the MSDP, then it is recommended that the upper limit for household income for beneficiaries of affordable housing should be set at a maximum household income of R30 000 per month in order to accommodate the fiscal drag for the 5 years that the MSDP is in effect.	All	Minor amendment to MSDP Text.	Definition updated by the City's Human Settlement Department.	
Planning Partners	External	Map 5f and Map 5d: While we understand that giving recognition to heritage resources in Cape Town is important, there are two interrelated concerns with these proposed heritage protection areas being included on/in the MSDP The Main Road corridor along which many of the proposed HPOZs are located is meant to be an area of the City that is targeted for investment and land use intensification (as per the guidelines contained in the MSDP). Therefore, promoting large areas along this corridor for "heritage protection" seems to be contradictory to meaningful land use intensification, especially considering that private developers have generally begun to steer clear of land or buildings with heritage connotations (for the reasons outlined in (b) below). Based on our experience, any statutory approval process (MPBL or otherwise) that involves matters of heritage invariably takes longer to be concluded than if heritage is not involved. This is even the case for properties that do not yet have formal heritage protection status. For example, processing of MPBL land use planning applications in areas identified in the 2012 district plans as 'proposed' HPOZs have often been delayed because these areas are misinterpreted (by both officials and commenting parties on the land use planning applications) to mean that they are subject to formal heritage protection, with the result that applications in these areas are often subject to frivolous objections and appeals on the grounds of heritage.	MSDP	No change required to MSDP.	The Areas under Investigation as Heritage Areas and the Heritage Protection Areas are on the map because: In terms of S31 of the NHRA: 31. (1) A planning authority must at the time of revision of a town or regional planning scheme, or the compilation or revision of a spatial plan, or at the initiative of the provincial heritage resources authority where in the opinion of the provincial heritage resources authority the need exists, investigate the need for the designation of heritage areas to protect any place of environmental or cultural interest. The outer boundaries of the Heritage Areas under investigation as well as exactly which assets should be protected is still under investigation.	

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Planning Partners	External	Given that the proposed HPOZs have no status in law, i.e. spatial development frameworks neither give land use rights nor take away land use rights (land use rights are entrenched in the zoning of a property and related regulations as contained in the DMS of the MPBL), and because the presence of these areas may stifle investment in Cape Town by enhancing risk for developers, it is our opinion that these proposed HPOZs add no value to the MSD. We therefore request that these areas be removed from the MSDs. If the heritage of these areas is truly valuable and worth protecting, then the City (or others) should take steps to formally declare these areas as HPOZs in terms of the MPBL, and then include these approved HPOZs in subsequent annual reviews of the MSD.	MSDF	No change required to MSD.	The Areas under Investigation as Heritage Areas and the Heritage Protection Areas are on the map because: In terms of S31 of the NHRA: 31. (1) A planning authority must at the time of revision of a town or regional planning scheme, or the compilation or revision of a spatial plan, or at the initiative of the provincial heritage resources authority where in the opinion of the provincial heritage resources authority the need exists, investigate the need for the designation of heritage areas to protect any place of environmental or cultural interest. The outer boundaries of the Heritage Areas under investigation as well as exactly which assets should be protected is still under investigation.	
Planning Partners	External	"Map 5g: Tourism considerations and Green Infrastructure" spatialises the "Green Infrastructure Network" (or GIN) in one broadbrush colour, without any differentiation or classification of different types of green space. This non-differentiation of green space is problematic because it implies that all green space forms part of a "green network" of ecological importance, whereas the reality on the ground is very different. Further, many of the areas indicated as "Green Infrastructure Network" are already developed, and/or have existing entrenched rights that have not yet been fully developed/re-developed. We therefore encourage the City to further analyse and refine the green spaces making up the GIN before formally publishing it as part of the MSD.	MSDF	No change required to MSD.	The Green Infrastructure Network (GINet) is intended to inform decision making by highlighting areas that provide green infrastructure services. These services may be infrastructural, ecological and/or social. The inclusion of a site in the GINet does not preclude development. The aim is to guide development such that the impact on the services is reduced where possible. Please refer to the GINet section of the DSD for further information.	
Planning Partners	External	An allied point is the biodiversity mapping, as per "Map 5b: Biodiversity Network and Marine Protected Areas", is still problematic in areas, with numerous approved and developed rights not being reflected	MSDF	No change required to MSD.	The Biodiversity Network on the MSD Biodiversity Network & Marine Protected Area map 5b and used in the related DSD maps is timestamped June 2021. It does not reflect all land use changes that have occurred since June 2021. Where a development is approved and the critical biodiversity areas still exist on the ground, they are not removed from the map as the legislation still applies. It is always necessary to contact the Biodiversity Management Branch for the latest information available and for a biodiversity specialist to conduct a site visit. The Biodiversity information is only removed once construction is completed and after there's a confirmation that the Environmental Authorisation and the Land Use approvals have not lapsed and rights are realised.	
Planning Partners	External	We recommend that the GIN layer in Map 5g in its current format should be removed in its entirety from the MSD. Once the network, and type, of open space corridors and linkages is further analysed and refined, public consultation with the owners and I&APs around this map should take place.	MSDF	No change required to MSD.	The Green Infrastructure Network (GINet) is intended to inform decision making by highlighting areas that provide green infrastructure services. These services may be infrastructural, ecological and/or social. The inclusion of a site in the GINet does not preclude development. The aim is to guide development such that the impact on the services is reduced where possible. Please refer to the GINet section of the DSD for further information. Refer to start of Technical Supplement A for an explanation that the layer is only for information purposes.	
Private	External	our Client applied for a temporary departure to legalise an existing cheese depot as aforesaid. However, such application was refused on the basis on unreasonable objections, particularly from the Joostenbergvlakte Community Forum, which our Client and numerous other property owners in the area feel has made it their core business to object to any application that does not suit their agenda. Inasmuch as such applications ought to be considered on merit and in accordance with the applicable legislative and planning framework, the City ought to ensure that such applications are not declined as a result of pressure from other groups in society that have a different attitude towards development and the creation of employment opportunities. Any objections filed should be thoroughly investigated to avoid erroneous decisions being given.	Northern	No change required to MSD.	Forwarded comment to DSD Team.	
Private	External	Densification, intensification and more access to affordable housing make sense for Wynberg as it is the main hub of the area	Southern	No change required to MSD.	Forwarded comment to DSD Team.	
Private	External	The City's vision of a highly diverse, vibrant urban environment with residential, commercial and mixed-use areas is exciting • Especially exciting is the plan to upgrade Maynardville to a space akin to New York's Central Park, to have many pedestrian areas and to "relieve" the more densely built areas with open and often green public spaces	Southern	No change required to MSD.	Forwarded comment to DSD Team.	
Private	External	Designating Wolfe Street as a scenic route and redeveloping the PTI are equally positive	Southern	No change required to MSD.	Forwarded comment to DSD Team.	
Private	External	A precinct plan for this area must urgently be drawn up in cooperation with Wynberg residents and stakeholders before development of the area continues.	Southern	No change required to MSD.	Forwarded comment to DSD Team.	

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Private	External	- The City and developers must take responsibility for contravention of building regulations and always rectify. (This should go without saying.) - The City must honour its own guideline to improve safety and security in the areas it aims to develop (BAR, page 83). - Developers should be encouraged to take pride in and responsibility for their buildings and the surrounding area. The City could assist with this. This could include for instance, planting trees, developing vertical gardens, etc. - The City should be careful about approving applications from developers with a history of irresponsible behaviour.	Southern	No change required to MSDF.	Forwarded comment to DSDF Team.	
Private	External	the City follows its guidelines and engages with residents and stakeholders about new developments so that a win-win outcome can be achieved.	Southern	No change required to MSDF.	Forwarded comment to DSDF Team.	
Private	External	I object to any further mass housing development in our area..its already saturated with blocks of flats and riddled with crime drugs and grime especially on the Main Road.The flats houses mainly foreign migrants that does absolutely nothing for people that have been born in Cape Town.Until such time that the filth crime etc is sorted out a moratorium must be placed on any new housing developments in our area.	Southern	No change required to MSDF.	Forwarded comment to DSDF Team.	
SANPARKS	External	In the 'Acronyms and Abbreviations' introductory sections of each report, please also include the following SANParks – South Africa National Park TMNP – Table Mountain National Park MPA – Marine Protected Area CFRPAWHS – Cape Floral Region Protected Areas World Heritage Site	All	Minor amendment to MSDF Text.	Noted and Updated	
SANPARKS	External	SANParks supports the maintenance of the Urban Development Edge (UDE) and Coastal Edge and associated guidelines as set out in the DSDF's as an effective tool to discourage inappropriate land uses outside the UDE. It would be helpful to provide a comprehensive overview with explanation and guidelines for both the Urban Development and Coastal Edges in this MSDF report.	All	No change required to MSDF.	Refer to the Urban Development Edge report attached to the recommendation report to Council as well as Guidelines in Chapter 5 of the MSDF Vol I.	
SANPARKS	External	Map M-5b Biodiversity Network' – the key for the MPA map indicates 'No take Zones' and 'Not no take zones'. The latter are referred to as 'Restricted Zones' in the applicable regulations and this terminology should be used.		No change required to MSDF.	Suggestion noted and adjustment made where required. The maps have been amended to reflect the correct terminology.	
SANPARKS	External	Fire risk lines are defined in the section Terms and Definitions (MSDF page 164). The definition should take into account that fire is not only a risk from the natural area to the urban area, but also that fire originating from the urban areas are a risk to the natural areas. Annually more fire start on the urban areas e.g. road verges and spread into the natural areas. In addition, the primary risk in these natural areas is from increased alien vegetation fuel loads located outside of the natural area and within the urban / residential areas.	All	Minor changes to the MSDF.	Noted and updated	
SANPARKS	External	For the Development Directives: Environment, MSDF Table (5.4 pg. 70) under veld fire and inner city fire risk areas, an overarching principle should be that managers of natural areas as well as residents adjacent to the natural areas should focus on reducing flammable fuel loads, especially from alien species such as pines and gum trees that pose a significant hazard to fire-fighting efforts.	MSDF	Minor update of MSDF Text.	Table 5.4 updated.	
SANPARKS	External	In terms of Map 5e, the fire risk lines comprise many management tracks that are not near the urban interface. It is suggested that only the fire risk lines on the urban edge area be shown.	MSDF	MSDF Map 5e fire line to be adjusted	The fire risk lines in the mountainous areas have been amended as per your suggestion. The boundary of the Urban Development Edge has been adopted as the fire risk line in these areas.	
SANPARKS	External	Map M-5f Heritage Resources' needs to be corrected as the Tokai planation areas do not form part of the Constantia Winelands Cultural Landscape – this is an inappropriate designation as the commercial plantations / State Forests are being phased out in terms of the national government decision and have been incorporated into the Table Mountain National Park and form core areas of the Cape Floral Region Protected Areas World Heritage Site (CFRPAWHS) as these areas comprise 'endangered' and 'critically endangered' fynbos vegetation	MSDF	Minor changes to the map.	Suggestion noted and adjustment made to Map 5f. The Constantia Winelands Cultural landscape includes the mountain backdrop as part of the setting and is not limited to land which is transformed i.e. the areas incorporated into the TMNP would still form part of the cultural landscape	
SANPARKS	External	Map M-5g Tourism Assets' – it is recommended that the Tafelberg Road - Kloof Nek - Signal Hill area be designated as a 'Tourism Development Area' due to the intensive, high volume and growing nature of tourism and recreational activities in this section of the TMNP.	MSDF	MSDF Map to be expanded	Suggestion noted and adjustment made to Map 5g and Map F16.	
SANPARKS	External	Pg 59 point 3(a) should reference the Cape Floral Region World Heritage Site (which is inscribed as a 'natural' WHS) and also the Table Mountain National Park as it is the only nationally protected area in the City.	MSDF	Minor changes to the map.	Table 4.3 updated.	

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SANPARKS	External	In Table 5.4 (pg. 67) - The 'Urban Development Edge' needs to be clearly explained in terms of how it was delineated and associated principles outlined (as is done for the 'Coastal Edge').	All	MSDF Text update	Table 5.4 updated. Please also refer to the Urban Development Edge Report.	
SANPARKS	External	In Table 5.4 (pg. 67) – NEM:PAA needs to be listed as an applicable law in terms of which protected areas such as TMNP and other declared provincial and city protected areas are managed.	All	Minor changes to MSDF Doc.	Updated	
SANPARKS	External	In Table 5.4 (pg. 70) - note SANParks as a marine authority in relation to the TMNP MPA.	MSDF	Minor changes to MSDF Doc.	Updated	
SANPARKS	External	In Table 5.4 (pg. 70) - note SANParks and Cape Nature as authorities in relation to the National Veld and Forest Fire Act.	MSDF	Minor changes to MSDF Doc.	Updated	
SANPARKS	External	Table 5.4 should list the Cape Floral Region World Heritage Site (which is inscribed as a natural WHS) and associated legislation (WHCA and NEM:PAA) and authorities (SANParks, Cape Nature). These protected areas are inscribed as WHS's in terms of UNESCO's Outstanding Universal Criteria (OUV) ix) ecological processes and x) biodiversity.	MSDF	Minor changes to MSDF Doc.	Updated	
SANPARKS	External	Please note in Table A1a: 'Spatial layers to be used for MSDF consistency determination process' (pg. 130) that: Section 41(2)(g) of NEMPAA states that a Management Plan for a protected area must contain "... a zoning of the area indicating what activities may take place in different sections of the area and the conservation objectives of those sections...". In addition, Section 24(2)(b) of SPLUMA stipulates that a land use scheme must take cognisance of any environmental management instrument adopted by the relevant competent authority and must comply with environmental legislation. In the case of TMNP, the 'relevant competent authority' is SANParks and the 'environmental management instrument' is the TMNP Park Management Plan.	MSDF	MSDF Table adjusted. WORK HERE FOR ANNELISE	Noted and table adjusted with text	
SANPARKS	External	MSDF Vol 2: Table C2: National legislation informing the 2022 MSDF Review (Pg. 32) description NEM:PAA - This description should include reference to section 41(2)(g) of NEM:PAA which states that a Management Plan for a protected area must contain "... a zoning of the area indicating what activities may take place in different sections of the area and the conservation objectives of those sections...". This has relevance to City planning and the MSDF.	MSDF	Minor changes to MSDF Doc.	Updated	
SANPARKS	External	MSDF Vol 2: Map F3: Socio-Economic Index map, 2011 pg. 84 indicates the Noordhoek Wetlands section of the TMNP as a socio-economic Index of 'very needy' (indicated in pink colour). Please note that this is incorrect as the area forms part of the TMNP with no residents in the area.	MSDF	No change required to MSDF.	This map dates to 2011 and will be updated as soon as the new census information becomes available. The map was generated on Small Area and Sub Place level and takes the boundaries used by Census SA. For clarity the Nature Reserves layer has been loaded on top of the socio-economic data.	
SANPARKS	External	MSDF Vol 2: Development Interest Map F6: 2021/22 (pg. 109) UDE amendments from District Spatial Planning process compared to 2013 and 2016 UDE: The flowing corrections to the text are requested Table Bay District: Map Ref. No. 40 Schotschekloof - Included inside UE: Please note that the 1998 Heads of Agreement between SANParks and City of Cape Town provided for transfer of staff, infrastructure, facilities and land to SANParks for establishment of the TMNP. Regarding transfer of the land it needs to be clarified that to date, only management of the land and not transfer in title to SANParks has been effected. The text needs to be corrected accordingly	MSDF	No change required to MSDF.	Refer to UDE report.	
SANPARKS	External	MSDF Vol 2: Map F16 Tourism opportunities (pg. 144): The Tafelberg Road - Kloof Nek - Signal Hill area should be designated as a 'Tourism Development Area' due to the intensive, high volume and growing nature of tourism and recreational activities in this section of the TMNP and the City.	MSDF	MSDF Map to be expanded	Suggestion noted and adjustment made.	
SANPARKS	External	MSDF Vol 2: Table F5: High-level summary of types of destination places, (pg. 144): 'Cape Point' and 'the peninsula' are categorized as 'Event-based' destinations. Although 'events' such as filming do occur, the predominant tourism role of Cape Point and the peninsula is nature based sightseeing and recreational activities (hiking, trail running, dog walking, mountain biking horse riding etc.)	MSDF	MSDF Text to be expanded	Add 'nature based sightseeing and recreational activities (hiking, trail running, dog walking, mountain biking horse riding etc.)' to the table	

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SANPARKS	External	MSDF Vol 2: Map F17: Destination places in the context of regional natural assets (pg. 145): The map needs to be corrected to indicate TMNP as a WHS in addition to its national park status.	MSDF	Minor adjustment to MSDF maps.	The right hand side map comes from the Provincial Spatial Development Framework and cannot easily be updated by the City. However, it has been adapted to convey that TMNP is a World Heritage Site.	
Private	External	I am in favour of densification and intensification of land use in favour of low-income housing. Sufficient time needs to go into consultation with local communities (specific streets) where buildings will be erected. It is important to gauge the impact that a five storey building would have on its immediate neighbours and their quality of life. Above all the design needs to be aesthetically pleasing. The City should ensure that these parameters are built within their plan and the legislature in order to hold private developers accountable	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	I object to the intensive development that has been happening in this area. I been impacted by this personally as a block of flats has been built on my boundary wall. NO consultation occurred between neighbours, developers and city council. Development went ahead causing intense distress, mess, damage to the boundary wall and house paint. We were told that plans were approved and passed by council! Time to think about the ratepayers, who pay for the upkeep of the neighbourhood. Time to consider the impact on the suburb that has historic value. Time to think about the people!! And not just the money	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Private	External	There are two points in the SDF where the planners have incorrectly included the outline of the lapsed / non-existent MSP urban edge (the south-western corner of the PHA). This is on p122 and 131 of the Vol II Tech Supplement B-F. This would be moot as both of the land use applications (termed Uvest 1 and 2 in the attachment) for that area were turned down by the MPT and the PAAP respectively. Except that this draft SDF has seen fit to include it once again, the City itself refused the rezoning applications in respect of Uvest land, both parcels of land in the PHA that were incorporated within the urban edge in the previous iteration of the SDF should now be included in the PHA, as being outside of the urban edge, as they have both remained zoned agriculture."	Cape Flats	No change required to MSDF.	The Uvest applications are excluded from the urban development edge in the South Western corner of the PHA. Please refer to the UDE Report. The Oaklands development already obtained all approvals in 2011/12 is included in the urban edge and was similarly reflected in the 2018 MSDF.	
Private	External	This (South Eastern) urban edge shift no longer exists and must be excised from the mapping. The area labelled CNA must be extended back across the full extent of the PHA. Likewise – the South Western edge shift has both lapsed (under LUPA) and is past the 5 year concession period granted in Circular 2/2013. The South Western urban edge shift no longer exists and must be excised from the mapping. The area labelled CNA must be extended back across the full extent of the PHA. In the alternative, while the outline of the OC urban edge shift may be shown on the map, the area should remain the same as the rest of the PHA - as Critical Natural Area for as long as until the development itself has been granted its full permissions. Until that time, the land is agriculture zoned and this should be indicated.	Cape Flats	No change required to MSDF.	Areas of Agricultural Significance hatching is indicated on Map 5d and includes the areas earmarked for resource protection. Except for the western boundary, which was already addressed in the the parallel processes of the Schaapkraal Study, the boundary are similar to the MSDF 2018. The Schaapkraal study is incorporated into the sub district guidelines in the Cape Flats DSDF.	
Private	External	The roads are in the Cape Flats DSDF EMF Vol 1 2022 on p90, figure 31 "Planned Public Right of Way Upgrades or New Links". The R300 is a conundrum, and the Indego Report (PHA Socio-Economic Agricultural Plan 2018) said that the R300 was NOT in the planning pipeline, and implies that Saving the PHA would include the shelving of this project. See Appendix 1 for extracts from this report. ANY ROADS ACROSS THE PHA WILL DESTROY THE FARMLANDS AS SURELY AS THE DEVELOPMENTS STOPPED WOULD HAVE. See Appendix 2 for the reasons these developments were turned down – the same reasons apply to why roads across the PHA should not be planned.	Cape Flats	No change required to MSDF.	The MSDF and DSDFs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
Private	External	The other two roads mapped are hugely problematic as already on the SDF, because when Oaklands has their issue before the MPT, they say 'look, they already put the roads in for us'. In this way, an item on the SDF grants rights that are not there. The campaign is of the opinion that they should only go on an SDF map ONCE THE DEVELOPMENT IS APPROVED. The Oaklands rezone and EIA were suspended by the court in 2020. – the land is still rural and agricultural. And as such, roads across the land are not only unwarranted, but will be detrimental to the water flow, and the continuation of agricultural activity in the area.	Cape Flats	No change required to MSDF.	The MSDF and DSDFs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and DSDF Teams

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Private	External	At present the City has many issues that require resolution within Wynberg (and likely all areas marked for densification) before such plans can be rolled out. We are cognisant that many of the points above (refer to original submission) are issues that need to be addressed on a Provincial and National level in order to see improvement but the sad reality is that pushing through densification and development into areas that are currently ill-equipped to absorb these additional pressures will see these large scale developments (MyCiti etc) relegated to the status of wasted investment. In order for wholesale improvements to be realised the entire system needs to be improved to the point that the benefits can be experienced. High-rise living for many people world wide is a reality. An improvement lifestyle within this type of densification is possible through the inclusion of arts programmes and public art installations.	Southern	No change required to MSDF.	Forwarded to DSDF Team.	
Ndifuna Ukwazi	External	the document is lacking any form of clear translation or detail on how the MSDF will address the spatial injustice and inequality. There is little evidence to demonstrate how formal planning systems will address the informal nature of Cape Town, in particular the spatial divide. A lot of the principles identified are normative principles of investment, densification and transit oriented development, but do not provide any radical departure from systems of the past. The concern is that the spatial vision will amount to more of the same.	All	No change required to MSDF.	The fact that the urban development edge were brought back and the optimisation of land development within the UIC and the CGAs are promoted, are strong signs of dealing with the post apartheid city. The DMS is a more powerful tool managing the built environment.	
Ndifuna Ukwazi	External	A Transit Oriented Development ("TOD") and land use intensification approach is overly generalised. The document provides no clear evidence of TOD currently working in Cape Town, based on the MyCiti experience. Most importantly, it underestimates the impact of TOD on surrounding property prices, which would ultimately lead to exclusion. There is little nuance that is used to describe the TOD strategy, and as a result assumes that the investments will be similar across the City. For instance, in around 2013 / 2014 work was done on all five stations in Khayelitsha (under the Integrated Urban Development Grant), where the study findings were specifically related to informal settlement upgrading and informal traders. Without clearly differentiating, this strategy will not realise its ambitions.	All	No change required to MSDF.	The DSDFs and the TOD strategic framework addresses this. TOD realisation is mostly visible on precinct and site level and is managed through Site Development Plans. The MSDF and DSDF mostly lay down principles and locations, not site specifics.	
Ndifuna Ukwazi	External	In relation to TOD and its impact on the surrounding properties, we reiterate again, that without an inclusionary housing policy in place, the City is not utilising its mandate under the Spatial Planning and Land Use Management Act ("SPLUMA") to condition developments and encourage affordable housing. The impact of investing in TOD, has been well documented in Johannesburg (with the Gautrain). A similar pattern could see that the public investment results in gains in private property prices and speculative practice. This would fundamentally contradict the ambition of the MSDF in 'avoiding the creation of new structural imbalances'.	All	No change required to MSDF.	The Inclusionary Housing is under development and references will be included as soon as it is Council approved.	
Ndifuna Ukwazi	External	It is encouraging to see the emphasis of affordable housing in the Urban Inner Core (one of Spatial Targeting Areas) (pg. 50). However, there are two concerns: firstly the boundaries of the urban inner core are too vast- from inner city to Phillipi and the Belleville corridor. A blanket description of the Urban Inner Core removes any nuance in understanding the very different nature of these urban areas. The inclusion of Atlantis in the urban inner core for new developments is worrisome. This will be a fundamental contradiction to the vision of the MSDF. Secondly, there is a concern that certain parts of Macassar and Blue Downs form part of the Incremental Growth and Consolidation area, rather than the broadly defined Urban Inner Core. These particular areas have been neglected over the last few years, and would tremendously benefit from inclusion into, perhaps another category that can be prioritised for investment.	All	No change required to MSDF.	UIC is also used to direct capital expenditure aimed at redressing the past and enhancing the investment underway in the Strategic Economic Zone in Atlantis and the development needs of a peripheral urban concentration such as Somerset West. Noted suggestion on Blue Downs / Macassar to be included in the UIC.	
Ndifuna Ukwazi	External	The document places very little emphasis on the Municipal Planning By-law ('the By-law') and its impact on urban sprawl and spatial planning. The By-law and interpretation thereof, have made the entire planning system driven by compliance rather than the spatial vision for the city. The cost of complying with tedious processes has delayed inner city social housing for years, and in some instances even decades. The pressing need for spatial transformation needs to be addressed with urgency and it must be addressed through streamlining internal City of Cape Town processes.	All	No change required to MSDF.	The updating of the MPB-L is a separate process and various progressive amendments were included over the past decade to facilitate the reality in CT such as the inclusion of the 2nd and 3rd Dwelling Units and a 'small scale rental units' category is under discussion.	

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Ndifuna Ukwazi	External	Furthermore, the Consolidated Land Pipeline is yet to be shared in public, and as a result it is difficult to assess when further parcels of land will be developed in the inner city, and the location of these parcels.	All	No change required to MSDP.	There is a programme on land release in the IDP, a public document. The annual report of the IDP would also report on that and citizens can engage the IDP office in this regard.	
Ndifuna Ukwazi	External	It is critical to note that land is the fundamental instrument to achieve a more inclusive Cape Town. This must be reflected with greater emphasis in the MSDP. This includes outlining some clear principles on how public land will be utilised- particularly that it does not get sold, auctioned or leased for short term financial gains. Simultaneously, it is fundamental that Cape Town addresses the exclusionary private land markets utilising SPLUMA as the instrument to change the spatial form of the city.	All	No change required to MSDP.	Land markets is outside the control of the MSDP. All public land transactions are regulated by the Municipal Finance Management Act and the Municipal Asset Transfer Regulations. All transactions relating to Council Land is advertised and decisions are taken at Council level, which is the highest decision making level of local authority.	
Ndifuna Ukwazi	External	We have some concerns about the practical implementation of the vision to "build an inclusive, integrated, vibrant and healthy city" and to tackle spatial apartheid. First, although the use of public land is clearly part of the City's vision for restructuring the City, there is a lack of clarity on the land release process which practically leaves well-intended commitments and plans stuck in the uncertainty of land release. This undermines the potential for public land to contribute to a different vision for the future of Cape Town and effectively maintains the spatial status quo	All	No change required to MSDP.	The City's Land Release Programme (programme 1.5) is documented as a key programme of the new term of office IDP and annual reporting on the progression of the programme would be made public.	City of Cape Town Document Centre: IDP 2022-2027
Ndifuna Ukwazi	External	there appears to be an institutional issue where future spatial visions such as the MSDP are not incorporated into KPAs for officials, meaning that these visions do not get achieved.	All	No change required to MSDP.	MSDP implementation plan has a Monitoring & Evaluation Framework with Programmes also incorporated into the IDP and Service Delivery and Budget Implementation Plan of the local authority, senior officials and the KPIs of staff in technical departments. The land release programme (programme 1.5) is a key programme under the responsibility of the Department of Economic Development. Please refer to the SDBIPs quarterly reporting and annual reporting on the City's IDP website.	City of Cape Town Document Centre: IDP with SDBIPs
Ndifuna Ukwazi	External	the vision outlined in this document must be accompanied with the necessary resourcing. For instance it is our understanding that only 1-2 officials are dedicated to social housing within the entire City structure, raising serious questions about the actual commitment to spatial transformation as outlined in the MSDP. If this spatial vision is to be achieved, it must be given the appropriate priority within the City, including through human and financial resourcing.	All	No change required to MSDP.	Staffing of certain departments is not something the MSDP can direct. The Social Housing Programme (Objective 7.1) and the Social Housing Incentives Initiative (7.1.8) is programmed in the IDP with Human Settlements and Economic Development as key Directorates. The progress of these programmes can be monitored by the public referring to the IDP SDBIP website.	City of Cape Town Document Centre: IDP website with SDBIP progress
Ndifuna Ukwazi	External	the responsibility for the implementation of this broad spatial vision clearly crossed many departments and yet there is not a clear outlining of how this plan will be held within the City structure.	All	Minor changes to the MSDP text (p 93 moved forward)	The Implementation chapter provides key programmes which are all covered in the IDP and where certain Directorates as pioned as responsible for implementation. The pre-conditions for the MSDP vision achievement was moved forward from p 93 to earlier in the text.	
Wynberg Residents and Ratepayers Association (WRRRA)	External	Wynberg has been ear-marked for densification and intensification as per the revised zoning overlay which came into effect in 2012, Wynberg is further included in the future roll-out of the MyCiti bus route that seeks to make affordable transport accessible to a larger social and geographical demographic. We as the WRRRA, representative and resident to Wynberg, realise that we cannot stop either of the aforementioned from taking place nor would we want to give the existing spatial injustices that continue unabated in South Africa. We are however making clear that neither of the above can take place without careful consideration regarding zoning adjustments and development within this suburb, one of the oldest in Cape Town.	Southern	No change required to MSDP.	Suggestions forwarded to DSDP Teams.	
Wynberg Residents and Ratepayers Association (WRRRA)	External	The proposed road and likely densified developments planned for the tracts of land between the railway, the two one-way Main Roads and the existing residential buildings, will result in 'dead' zones. These 'dead' zones will have a negative impact on the safety and security of residents who are already impacted by an increase in crime caused by betting shops, shebeen-style bars with suspect licencing and problem landlords	Southern	No change required to MSDP.	Suggestions forwarded to DSDP Teams.	
Wynberg Residents and Ratepayers Association (WRRRA)	External	Of further concern is a lack of planned improvement to existing service infrastructure notably water pipes and sewerage systems. Any additional pressure on these already antiquated systems result in burst pipes, sewerage backlogs and sinkholes forming on narrow roads that are ill designed to cope with contemporary traffic demands. Any increase in densification within Wynberg West will further add additional burden onto the existing and old infrastructure. The City of Cape Town must include the upgrade and ongoing maintenance of the Wynberg service infrastructure as part of the densification project scope of work.	Southern	No change required to MSDP.	Suggestions forwarded to DSDP Teams.	

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Wynberg Residents and Ratepayers Association (WRRRA)	External	The WRRRA would like to make it clear from the outset that we have not been consulted regarding the review of the MSDF and DSDF (from 2019) as per the timeframes indicated in the presentations made, the process which seems to have side-stepped the WRRRA. References to 2012 frameworks to which we have no prior knowledge notably SDF & EMF	Southern	No change required to MSDF.	Suggestions forwarded to DSDF Teams.	
Wynberg Residents and Ratepayers Association	External	Development corridor: Wynberg Village and Hill were rezoned without any consultation with residents: the previous councillor dismissed residents concerns in this regard	Southern	No change required to MSDF.	Suggestions forwarded to DSDF Teams.	
Wynberg Residents and Ratepayers Association (WRRRA)	External	Wynberg residents' only experience thus far is that developers get away with no consultation and a flagrant disregard of boundary lines. The WRRRA would like to remind the City and relevant department that as per its 2019 STANDARD OPERATING PROCEDURE FOR THE NOTIFICATION OF LAND USE DEVELOPMENT APPLICATIONS IN TERMS OF THE CITY OF CAPE TOWN MUNICIPAL PLANNING BY-LAW, 2015, clause 3.2.2 'The City shall provide the applicant with a complete list of names and addresses of people whose rights or legitimate expectations are or are likely to be materially and adversely affected, to be served a notice.' The WRRRA is not receiving notice regarding developments in Wynberg.	Southern	No change required to MSDF.	Suggestions forwarded to DSDF Teams.	
Wynberg Residents and Ratepayers Association	External	With Wynberg being declared a metropolitan node, has the correct budgetary consideration been taken into place in regard to increased police resources?	Southern	No change required to MSDF.	Suggestions forwarded to DSDF Teams.	
Wynberg Residents and Ratepayers Association (WRRRA)	External	Refer to original submission for detailed (mostly operational) comments	Southern	No change required to MSDF.	Suggestions forwarded to DSDF Teams.	
Urban Dynamics - WC	External	Comments relate to the Draft Helderberg Integrated District Spatial Development Framework (2022) with regard to Portions 16, 17, 41 & 42 of Farm 959 Stellenbosch (hereafter referred to as Sweetwater). Our feedback will predominantly focus on the response received based on our comments dated 4 June 2022 (refer Annexure A). It is our submission that the proposed inputs have not been adequately addressed or implemented and requires further consideration from Spatial Planning and Development.	Heldeberg	No change required to MSDF.	Suggestions forwarded to DSDF Teams.	
Urban Dynamics - WC	External	On the basis of the afore-going investigations and the logical outcome related thereto, it is respectfully requested that this memorandum (along with the submission in Jun 2021) is carefully re-considered and constructively included as input to the current District Planning exercise. □	Heldeberg	No change required to MSDF.	Suggestions forwarded to DSDF Teams.	
Urban Dynamics - WC	External	Furthermore we request that due and careful consideration is given to the proposed revision / refinement of the District Spatial Policy to include the sites and the immediate environs into the "Potential Low Density Residential Development and High Value Green Infrastructure" in the urban edge, as presented by Figure 2.	Heldeberg	No change required to MSDF.	Suggestions forwarded to DSDF Teams.	
Urban Dynamics - WC	External	It is further requested that this office be given the opportunity to present the potential development proposals to the City's spatial planning department, at a suitable stage, during the current revision process.	Heldeberg	No change required to MSDF.	Suggestions forwarded to DSDF Teams.	
PGWC Road Investment Planning	External	TR 77 Section 1 (R27 between Tryall and Berkshire) is currently in the process of being upgraded to a municipal standard by the City. Due to the road condition at completion of the upgrade and as part of ongoing devolution process, it is suggested that the city accept transfer of this road as authority.	Blaauwberg	No change required to MSDF.	Road transfers as assets is not a topic the MSDF or DSDFs deal with. The comment will be forwarded to the Urban Mobility Department.	Urban Mobility and PROW
PGWC Road Investment Planning	External	As an affected stakeholder, the DTPW Roads Branch will need to be consulted in connection with any work on the potential R300 alignment.	Blaauwberg	No change required to MSDF.	The MSDF and DSDFs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
PGWC Road Investment Planning	External	It is noted that Figure 3 indicates the realignment of OP111 (Vissershok Road). The DTPW Roads Branch needs to be consulted as the relevant Road Authority in connection with any impact regarding this road.	Blaauwberg	No change required to MSDF.	The MSDF and DSDFs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
PGWC Road Investment Planning	External	Further discussion with DTPW Roads Branch is necessary regarding extension of the M12 to Berkshire. The possible extension of the M12 to Morningstar should be considered in conjunction with the extension to Berkshire.	Blaauwberg	No change required to MSDF.	The MSDF and DSDFs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW

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PGWC Road Investment Planning	External	WCG is currently the Road Authority of all main roads in Atlantis. The City has indicated that authority-ship over these roads shall not be considered as part of the ongoing road devolution process. As a result of the CBD expansion, suggestion would be that the CoCT accept road authority-ship.	Blaauwberg	No change required to MSDF.	Road transfers as assets is not a topic the MSDF or DSDFs deal with. The comment will be forwarded to the Urban Mobility Department.	Urban Mobility and PROW
PGWC Road Investment Planning	External	The DTPW recently approved a proclamation for the closure of the portions of Minor roads 61&62 which traverse Cape Farm 1 Groote Springfontein conditional to the approval of a development applicant for the farm. Both the DSDf (Oct 2021) and the recent MSDf omitted the 2 development nodes at Springfontein farm (despite inclusion in the 2017 documents) which compromises the development application. The DTPW and DEADP's Coastal Management Branch supports a limited footprint for the development to fund improved Coast Access as envisaged in section 18(9) of the Integrated Coastal Management Act. DTPW have received and endorsed comments from the Springfontein owners re the concept of an eco-village and walkway access linking the Development with Silverstroom resort in future (Aug 15th 2022). It is therefore recommended that these development nodes be included in some form in the IDSDf as in the 2017 document.	Blaauwberg	No change required to MSDF.	The Springfontein Farm is in the 5-16km zone around Koeberg. Refer to UDE Report for reasons why the node is not proactively included in the UDE. The applicant can still apply through various processes. There are no coastal nodes shown on the Consolidated Spatial Plan Concept Map 5d. Silverstroom coastal destination place is shown on Map 2d Green Infrastructure Network and destination places as well as on Map 5g Tourism Assets & Green Infrastructure Network.	
PGWC Road Investment Planning	External	It should be noted that for the projects listed below, the DTPW is an affected party. As a result, DTPW to be consulted as these projects are progressed • R300 Extension, Baden Powell Extension, Vanguard Extension and Princess Vlei Parkway	Cape Flats	No change required to MSDF.	The MSDf and DSDfs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
PGWC Road Investment Planning	External	Klipfontein Road (NY108)- Borchers Quarry to Duinefontein Road – to service Nyanga, Gugulethu. As an affected stakeholder, the DTPW Roads Branch will need to be consulted in connection with any planning regarding Klipfontein Road.	Cape Flats	No change required to MSDF.	The MSDf and DSDfs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
PGWC Road Investment Planning	External	MR108 is currently a provincial road upgrade project. Future dual link. DTPW to be consulted regarding any developments affecting this link.	Helderberg	No change required to MSDF.	The MSDf and DSDfs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
PGWC Road Investment Planning	External	The upgrade of the T2 is almost complete and will address congestion problems in the area. This upgrade is believed to also accommodate the upgrade of Main Road 108 (Gordon's Bay/ Sir Lowry's Pass Rd.) It should be noted that this statement is incorrect. The T2 upgrade and upgrade of MR108 are currently separate projects and should be listed as such.	Helderberg	Minor change in MSDf text.	Minor change in MSDf Text.	
PGWC Road Investment Planning	External	Baden Powell Dr (Dualling) DTPW to be consulted should any development take place regarding Baden Powell dualling as the DTWP is an affected party in this case.	Helderberg	No change required to MSDF.	The MSDf and DSDfs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
PGWC Road Investment Planning	External	DTPW to be consulted should any further development take place regarding Borchards Quarry realignment and R300 Southern Extension Planning.	Northern	No change required to MSDF.	The MSDf and DSDfs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
PGWC Road Investment Planning	External	A discussion is required between the City and the DTPW regarding the Tygerberg valley road realignment. The unconstructed link between the N7 and Blaauwberg is currently not proclaimed.	Northern	No change required to MSDF.	The MSDf and DSDfs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
PGWC Road Investment Planning	External	The dualling of Bottelary between Amandel to Saxdown is developer funded. DTPW is currently the road authority however CoCT should accept authority-ship for Bottelary.	Northern	No change required to MSDF.	Road transfers as assets is not a topic the MSDf or DSDfs deal with. The comment will be forwarded to the Urban Mobility Department.	Urban Mobility and PROW
PGWC Road Investment Planning	External	It is to be noted that the DTPW will only consider a half diamond interchange on Carl Cronje at the N1 freeway once Collector-Distributor roads have been constructed.	Northern	No change required to MSDF.	The MSDf and DSDfs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
PGWC Road Investment Planning	External	DTPW to be consulted should any development take place regarding R300 Northern Extension Planning at Legato and Langenberg interchanges	Northern	No change required to MSDF.	The MSDf and DSDfs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
PGWC Road Investment Planning	External	DTPW to be consulted should any development take place regarding R300 Southern Extension Planning and any other project which may impact Proclaimed Provincial Roads	Southern	No change required to MSDF.	The MSDf and DSDfs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW

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PGWC Road Investment Planning	External	As an affected stakeholder, the DTPW Roads Branch will need to be consulted in concern with any work on the Frans Conradie Extension.	Table bay	No change required to MSDF.	The MSDF and DSDFs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
PGWC Road Investment Planning	External	As an affected stakeholder, the DTPW Roads Branch will need to be consulted in concern with any work on the Church Street N1 Interchange reconfiguration.	Tygerberg	No change required to MSDF.	The MSDF and DSDFs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
PGWC Road Investment Planning	External	The upgrade of Bottellary Road (MR187) is noted as being of high urgency. As an affected stakeholder, any intersection control proposal on MR177 and MR187 will require approval by the DTPW Roads Branch. As an affected stakeholder, the DTPW Roads Branch will need to be consulted in connection with devolution of the applicable sections of MR187.	Tygerberg	No change required to MSDF.	The MSDF and DSDFs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
PGWC Road Investment Planning	External	Due to the DTPW being the applicable Road Authority for the sections of the N1 and N2 at their intersections with the M7, the designs for these interchanges will need to be approved by DTPW.	Tygerberg	No change required to MSDF.	The MSDF and DSDFs reflect that which is contained in the latest approved Public Roads of Way Documents compiled by the Urban Mobility/ Transport Department (2017) and was approved by Council. Comments and suggestions have been forwarded to the relevant department and updates of the PROV are in progress.	Urban Mobility and PROW
PGWC Road Investment Planning	External	As an affected stakeholder, the DTPW Roads Branch and any relevant Road Authority will need to be consulted during the development of any Scenic Drive/Routes (or similar) Policy and endorsement and/or approval will be required before any measures can be implemented.	All	No change required to MSDF.	Noted will consider when Scenic Route Guideline Documents are updated.	
PGWC Road Investment Planning	External	As an affected stakeholder, the DTPW Roads Branch and any relevant Road Authority will need to be consulted in the development of Policy, especially as it relates to the road environment.	All	No change required to MSDF.	Noted. Comment forwarded to City's Urban Mobility Directorate.	
PGWC Road Investment Planning	External	As an affected stakeholder, the DTPW Roads Branch and any affected Road Authority will need to be consulted in connection with any impact (direct or indirect) on the Proclaimed Provincial Road Network assets.	All	No change required to MSDF.	Noted. Comment forwarded to City's Urban Mobility Directorate.	
PGWC Road Investment Planning	External	The planning of key bulk infrastructure needs to be considered to ensure that appropriate space/provision is made. During the process of providing the required infrastructure to support growth and development, the DTPW Roads Branch and any other affected road or utility authority will need to be consulted.	All	No change required to MSDF.	Noted. Comment forwarded to City's Urban Mobility Directorate.	
PGWC Road Investment Planning	External	Any proposal which necessitates use of sections of the proclaimed road reserve to accommodate development will require consultation and approval from the relevant Road Authority.	All	No change required to MSDF.	Noted. Comment forwarded to City's Urban Mobility Directorate.	
PGWC Road Investment Planning	External	The DTPW Roads Branch will need to be consulted as an affected party in connection with any impact on the Proclaimed Provincial Road Network assets.	All	No change required to MSDF.	Noted. Comment forwarded to City's Urban Mobility Directorate.	
PGWC Road Investment Planning	External	As the relevant road authority, DTPW Roads Branch will require consultation in developing proposals along Provincial Road links. Consult with DTPW Roads Branch for additional information if required, as the information provided on transport infrastructure project pipeline in the SDF may not be up to date. It is important to note that implementation timing and funding of DTPW-led Projects to be determined by the DTPW Roads Branch.	All	No change required to MSDF.	Noted. Comment forwarded to City's Urban Mobility Directorate as future road planning data sets are held by the Transport Department.	
PGWC Road Investment Planning	External	Arterial Management Plans (AMP) are tools guiding the planning of major roads where pressure from adjacent development must be balanced with the mobility function of that road. DTPW Roads Branch approval of Arterial Management Plans is required where Proclaimed Provincial Road Network assets are directly or indirectly affected. This Approval is required prior to the implementation of any proposals.	All	No change required to MSDF.	Noted. Comment forwarded to City's Urban Mobility Directorate.	
Environmental & Heritage Management	Internal	Table Bay District Spatial Development Framework: Comments on Mapping See detailed map extracts and comments on the original submission	Table Bay	No change required to MSDF.	Forwarded to DSDF Team.	
Upper Claremont Residents and Ratepayers Association	External	The heritage plan as per Appendix A does not include the proposed Claremont Village. We strongly object to this omission and lack of acknowledge of the heritage value of the area, and the application by the UCRRA.	Southern	No change required to MSDF.	Noted to be addressed in DSDF.	
Upper Claremont Residents and Ratepayers Association	External	the current provisions in the MPB-L (and the district SDFs as the most applicable and relevant policy) provide only the vaguest direction as to the criteria for decision-making in areas designated as HPOZs. This leads to uncertainty and conflict between applicants, interested parties, and the City's decision-making officials	Southern	No change required to MSDF.	Criteria for decision making on HPOZ or areas under investigation cannot be stipulated in the MSDF which is a broad policy document. The MPB-L or other legislation guide decision making processes.	
V&A Waterfont	External	No definition is provided for HPOZ.	Table Bay	No change required to MSDF.	Updated with input from specialists in City.	

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Upper Claremont Residents and Ratepayers Association	External	Given these arguments, I attach an appendix that illustrates, by example, the kind of provisions necessary for each of the district SDFs in respect of each of the HPOZs and their significances which would obviate the most egregious contradictions and controversies so frequently bedevilling development proposals in HPOZs. These provisions are, of course, in addition to those more general guidelines listed in other parts of the district SDFs, but they are framed within the HPOZ (or part of the HPOZ) referred to. This appendix lists just six HPOZs in order to demonstrate the kind of provisions that are suggested are necessary. I note too that these suggested provisions are very easily identified and articulated; and such provisions should be developed for every HPOZ already declared and new proposed HPOZs should not be administered or suggested without these minimum provisions.	Southern	No change required to MSDF.	Updated with input from specialists in City. Added additional definition on Proposed / Potential Heritage Areas.	
V&A Waterfornt	External	The term "heritage area" and its definition is consistent with the NHRA whereas the term "heritage conservation area" and its definition is ambiguous. Based on the definition provided, it appears that "heritage conservation area" may be used interchangeably with or as a blanket term for a "heritage area" or "heritage protection overlay zone". As these terms involve different processes under different legislation (National Heritage Resources Act vs Municipal Planning By-Law), the interchangeable use of these terms does not facilitate clear policy direction	Table Bay	No change required to MSDF.	Only change if Heritage layers change.	
V&A Waterfornt	External	If "heritage conservation area" and "HPOZ" are used interchangeably, it is unclear why these are listed separately in Table 5, with different guidelines and management priorities. It is also unclear why Green Point is listed specifically as a heritage conservation area in Table 5 and how this relates to the designations in Figure 13.	Table Bay	Minor change to MSDF text.	Updated with input from specialists in City.	
V&A Waterfornt	External	The definition of "heritage conservation areas" includes areas identified for protection, but which may not yet have been formally protected, i.e. proposed heritage areas or proposed HPOZ areas. This is highly problematic as the significance of proposed areas has not been tested, no consultation process has been followed, nor have these areas been gazetted; hence, they have no legal status and cannot be treated in the same manner as declared heritage / HPOZ areas. Attention is drawn to footnote 2 on p. 31, which states: "The existing and proposed HPOZ together with individual formally protected heritage sites, must be considered in planning, development and land use management decisions". As noted above, proposed HPOZ areas have no legal status and no bearing on development applications until such time as a proper consultation process has been followed and the designation of the area has been gazetted; hence, this footnote must be amended to exclude proposed HPOZs.	Table Bay	Minor change to MSDF text.	Updated with input from specialists in City.	
V&A Waterfornt	External	Clarity is requested on the process followed (moving from the old Urban Conservation Areas under previous legislation to the HPOZ under the MPBL). For an HPOZ to be categorised as formally declared, the expectation is that there are already area-specific guidelines in place – this does not seem to be the case. In the absence of area-specific guidelines, the District SDF is not the place to identify what analysis is still required.	Table Bay	Minor change to MSDF text.	Updated with input from specialists in City. Added additional definition on Proposed / Potential Heritage Areas.	
V&A Waterfornt	External	As noted above, proposed HPOZ/heritage areas have no legal status; therefore, the District SDF should not be establishing guidelines and management priorities for proposed areas. It is our view that it is essential to first conduct an analysis of areas prior to the delineation of proposed HPOZs; in other words, the analysis should inform the delineation, not the other way around.	Table Bay	No change required to MSDF.	Only change if Heritage layers change.	
V&A Waterfornt	External	Distinction must be made between heritage areas and HPOZ areas (Table 5 refers to Proposed HPOZs while Figure 13 refers to Proposed Heritage Areas), and the legislation and process under which these areas are proposed to be protected.	Table Bay	No change required to MSDF.	Only change if Heritage layers change.	
V&A Waterfornt	External	In June 2021, we provided the reasons as to why a proposed Heritage Area for the vast majority of the V&AW is not applicable nor practical. This comment does not seem to have been given due consideration or adequately assessed as the exact same delineation appears in the January 2022 draft document. Accordingly, the delineation of the V&AW as a proposed Heritage Area is rejected. To substantiate this position, our comments are repeated below	Table Bay	Concerns not take up re heritage	Comment forwarded to Heritage Department. All information used in MSDF and DSDF comes from the key technical experts in line departments.	Forwarded to Heritage

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V&A Waterfont	External	There has been no consultation with the V&AW on the process to be followed, the criteria on which the proposed Heritage Area is based, nor the nature of heritage significance identified. The designation as a "proposed urban conservation area / heritage area" has been in place since the 2012 Table Bay District Plan, and its applicability has been previously queried. Comments from the V&A on the 2019 draft Baseline and Analysis Reports and the 2021 draft Table Bay District SDF & EMF referred to the requirement for clarity on the criteria for delineation and the process. The 2022 report does not provide any information on these issues.	Table Bay	No change required to MSD.	Only change if Heritage layers change.	
V&A Waterfont	External	In our comments on the draft Baseline and Analysis Reports, the extent of the V&AW demarcated as a proposed heritage area was questioned, given the variations in character and heritage value across the property. This comment was repeated in our comments on the 2021 draft Table Bay District SDF & EMF, and is again repeated here	Table Bay	No change required to MSD.	Only change if Heritage layers change.	
V&A Waterfont	External	Heritage management at the V&AW needs a different approach, including flexible and innovative mechanisms which can respond rapidly to changing circumstances. Introducing an additional level of decision-making and a degree of arbitrariness is not regarded as being appropriate to the context. The definition of the proposed Heritage Area for the V&AW should be reconsidered, and a CMP acknowledged as the effective mechanism to ensure the required management measures of heritage resources in the V&AW.	Table Bay	No change required to MSD.	Only change if Heritage layers change.	
Private	External	I write to express my concern about the increasing densification of Wynberg. I object in particular the erection of so many soul-less blocks of flats that have absolutely no garden areas, very limited on-site parking, not even proper balconies, and which abut the neighbouring properties with no offsets.	Southern	No change required to MSD.	Comment forwarded to DSDF Team.	
Private	External	Please reconsider your densification plan for Wynberg there are other less populated suburbs we are saturated people. Personally I call Wynberg little Africa. People come from the whole of Africa and live here. That's not a problem for me but living 10 or more on one property is.	Southern	No change required to MSD.	Comment forwarded to DSDF Team.	
E&E Burh Trust	External	The E&E Burh Trust supports the SDF, its policies and predicted outcomes for new, inclusive development opportunity in the Northern district.	Northern	No change required to MSD.	Noted.	
Private	External	Melkbos sewerage is experiencing problems of overspilling and not coping with the load as it is now. Water pipes are breaking constantly. It seems the area is not able to provide more supply due to the pressure requirements related to higher flow rates. Koeberg emergency plan might be jeopardised by the higher population numbers and evacuation being limited by insufficient road network. The traffic infrastructure is limited as it is, with difficulties at the high school and high density on the R27 and N7 link. Melkbos infrastructure itself is insufficient to support an extended population in terms shopping facilities and schooling. These issues would have to be addressed before implementation of the intended developments. □	Blaauwberg	No change required to MSD.	Noted. Comment forwarded to DSDF Team.	
Private	External	I would like to formally comment on the proposed PHA Spatial Development Framework under review. With regards to the proposed development in the Weltevreden wedge, it seems very unfair that the wedge is being changed to align with National and Provincial governments plans for low cost housing. If the wedge is to be developed we would like to see it developed into a space that uplifts the area and the value thereof. Commercial development/Business parks may be welcomed. Furthermore, Areas on the boundaries not farming should equally be given the opportunity to follow protocol for re-zoning and development.	Cape Flats	No change required to MSD.	Noted	
Urban Institute for Urban Design- WC	External	In general UDISA is in support of the general intentions and goals of the Metropolitan and District Spatial Development Plans. In fact we would go further than that and argue that all of the intentions listed on page 14 are more than laudable so no need to list them again here. UDISA is in particular support of the core idea of "inward-growth-focused" development.	All	No change required to MSD.	Noted	
Urban Institute for Urban Design- WC	External	The concern and issue that UDISA would like to bring to the table is therefore not in questioning the goals and intentions of the policy, but rather the issue of how come these are not producing the results that are intended. UDISA has repeatedly pledged to offer itself to work with City officials to see how these issues could better be solved.	All	No change required to MSD.	Noted	

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Urban Institute for Urban Design- WC	External	The issue seems to be the way policies in general can so easily be ignored, sidelined and or worse misconstrued for the wrong ends. For example, The Cape Town Boundary Wall and Fence Policy, and The Cape Town Urban Design Policy are routinely ignored while the Cape Town Densification Policy seems to be routinely used by every developer to justify densification at all cost, even when bad and even though the policy itself is more nuanced and does not actually advocate densification in every case. In contrast to this, provisions in the Development Management Scheme (DMS) (what used to be called the zoning scheme) tend to be treated in exactly the opposite way, being followed to the "T" to the level of absurdity such as with plans being rejected because a plans examiner was able to zoom 600% in on the PDF drawing and see that the roof ridge is 1mm (one millimetre) higher than the maximum height. (This is absurd as it is not even possible to measure the height of the ground to an accuracy of 1mm).	All	No change required to MSD.	Noted	
Urban Institute for Urban Design- WC	External	The city must introduce measures to both incentivize good efficient urban layouts and conversely put in place measures to restrict or stop bad suburban sprawl layouts.	All	No change required to MSD.	Concerns noted	
Urban Institute for Urban Design- WC	External	The city must introduce measures that both control for and incentivize appropriate urban building development typology. (Note, we are referring to building development typology, not building construction technology). The City has understood that there is need for densification. What is not understood and fully appreciated is that densification is only good if done on an urban development building typology. Simply willfully and woefully allowing any and all forms of densification tragically misses the point. It simply reproduces the very same impoverished squalid "slum" living conditions, with no light, ventilation etc. that have blighted so many cities in the past and which were the reasons for building and planning controls being introduced in the first place. The problem is that all too often officials get bogged down in the tedium of administrative process and fail to keep in mind what is the intention behind having these rules and regulations.	All	No change required to MSD.	Concerns noted. The Development Management Scheme is the instrument framing the way the built environment is managed.	
Private	External	As a resident of Wynberg I would like to express my concern with regards to the state of Wynberg. Wynberg is undergoing tremendous strain currently on all fronts. The roads are in disrepair full of potholes and is causing damage to vehicles. This is because upgrading is not taking place and the traffic is just becoming heavier and causing more problems. The residents of Wynberg has to take on the task of protecting Wynberg's heritage, keeping Wynberg clean, and keeping their properties and their families and their businesses safe. We need the City to help us to preserve Wynberg for the generations to come and get it back to its previous glory. Densification would be the further nail in the coffin.	Southern	No change required to MSD.	Comment forwarded to DSDF Team.	
Private	External	Spatial Housing on the land OTTERY SCHOOL OF INDUSTRY, in Ottery Zone 20. In response to the proposed development of spatial housing on this plot of land that will bring about 60 000 people into the area. The proposed 8 story flats which will turn our area into a concrete jungle. Where is the greening, eco and environmental studies. We as rates paying citizens in our area and surrounding areas desire to live within a area that has a positive psychological effect on our daily interactions and lives. Many of the residents in Fairways are retired professionals teachers, lawyers, etc whose life savings and security is in the homes and cannot just move out of the area and buy else where. Fairways will be wedged between 2 areas, gang infested, drug lords, criminals fighting for their turf. Pedestrians and motor vehicles, taxis, buses in their large numbers using our avenues to commute between will bring congestion and high noise levels into our area. Based on the above concerns it will be without merit to go ahead and build and develop on this site. The city needs to engage with the residents to discuss developments that will address the issues of the residents that are affected by these proposals. Thank you. With much anticipation	Cape Flats	No change required to MSD.	Comment forwarded to DSDF Team.	
Chadernay Glenn NGO	External	Our submission is to ask if the land parcel become part of the policy as a piece of land earmarked for an integrated housing development. The site falls just outside what the MSD highlights as prioritised Human Settlements Areas and is closely located to the Philippi Opportunity Area (PHA). The site is located within a critical natural asset the Philippi Horticultural Area (PHA), land seaward of the Coastal Edge, and mountainous areas performing an agriculturally-significant or catchment function.	Cape Flats	No change required to MSD.	Comment forwarded to DSDF Team.	

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Durbanville Community Forum	External	The IDP requires these plans to address the fragmented, inefficient spatial form that resulted from apartheid planning. In its current form the 2022 Northern SDF fails in this regard and instead exacerbates the apartheid era spatial planning as follows: • By including a commercial airport in a previous "rescinded" growth area (due to National and IDP principles) in the North Eastern area of the District, where low cost housing is directed, and in non-compliance with the TIO Policy, whilst historic and centrally located wine farms are being included for potential up-market development. The IDP also requires spatial planning and development to actively pursue the densification of the urban inner core which will in turn drive the policy of transit-oriented development (TOD). This cannot be achieved by continually extending the urban edge further and further away from the City CBD and places of work. Doing this is the exact opposite to what the IDP and TOD Policy direct. This is one of the reasons why such outward expansion was rescinded in the current 2018 CTMSDF (refer item 4. below). Nothing has changed since then. □	Northern	No change required to MSDF.	The inclusion of the Bella Riva and the Winelands airport land parcels was based on the fact that an Environmental Authorisation was already in place for Bella Riva prior to 2018 and the National Department of Agriculture already agreed to a 70 of 70 amendment as well. The 2022 Urban Development Edge is therefore a technical alignment of already approved processes. Winelands Airport had zoning rights which trump spatial policy processes and documents such as the MSDF and DSDF. The rights were acknowledged in this 2022 version.	
Durbanville Community Forum	External	• At the same time the centrally located (to the City CBD and places of work) fully compliant South Western area of the District, with access to the BRT and with a future BRT connector route is planned and where inclusive, integrated, transformative mixed development is successfully taking place, with an existing road infrastructure, is prevented from expansion.	Northern	No change required to MSDF.	Noted	
Durbanville Community Forum	External	A commercial airport is included in a rescinded growth area where low-cost housing is directed in the furthest North Eastern corner of the District where there is no public transport, whilst historic and centrally located Wine Farms are being included for potential up-market development. At the same time the centrally located fully compliant South Western area with access to the BRT where truly inclusive, integrated, transformative mixed development can take place, is prevented. Is this how the drafters perceive addressing the injustice of apartheid era spatial planning? The current 2012 Northern District Plan is more compliant with SPLUMA, the IDP, TOD and all higher-level plans than the 2022 Draft NSDF and should be retained until the Draft NSDF is rectified. Once rectified there should be another final commenting period.	Northern	No change required to MSDF.	The North Eastern corridor has an existing rail line which can be improved for enhanced passenger rail functions.	
Durbanville Community Forum	External	Accordingly the DCF cannot support the Draft 2022 NSDF until the above imbalances are corrected and calls on Sub-council and the City Council to reject the current Draft on this basis and retain the existing Northern Development Plan in the interim, until the above mentioned issues are addressed and rectified. The current Northern District Plan is arguably more compliant with SPLUMA, the IDP, TOD and higher-order plans than the Draft 2022 NSDF is in its current format.	Northern	No change required to MSDF.	Noted	
Durbanville Community Forum	External	Table 10 of the Draft Technical Report (Vol 2) refers to Durbanville Wine Farms and specifically states that "No "urban" land use should be considered on wine farms". The Farm Altydgedacht is specifically mentioned as one of the farms where this applies. An extract of the Table is shown below: It is therefore strange that its inclusion into the urban edge can be motivated in a manner which is misleading to the public and we request that the statements be corrected and subjected to another round of public participation prior to approval of the Draft 2022 NSDF. Furthermore, what is the reason for removing the provision that "'No "urban" land use should be considered on wine farms"? The above responses already show how easy it is to manipulate motivation for portions of these farms to be incorporated into the urban edge for development. For this reason, the statement needs to be retained unless there is some sinister future intent to allow development of these historic farms. Why else would such an important statement be removed? Why was this not highlighted during the PPP? Who is responsible for the omission of this statement? This causes the public to mis-trust the process	Northern	No change required to MSDF.	Land use application processes will still follow the DSDF indicative land uses. The DSDF does not give or take away existing or future rights. Separate processes will have to be followed which will include multiple engagements and public notification processes.	
Durbanville Community Forum	External	If development is allowed on this portion of Altydgedacht, where will it end as it sets a dangerous precedent? This needs to be highlighted and brought to the attention of the public. Also why does the Draft 2022 NSDF omit the fact that the farm is subject to the Agricultural Land Act, 70 of 1970? This is a public participation process and all the facts need to be disclosed so that the public can make informed decisions and respond appropriately.	Northern	No change required to MSDF.	Land owners and their advisors know that all subdivision of agricultural land is subject to 4 approvals from 4 pieces of legislation: LUPA, NEMA, 70 of 70 and MPB-L.	

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Durbanville Community Forum	External	The statement that "No "urban" land use should be considered on wine farms", is omitted from the Draft 2022 NSDF and the wording "in terms of the City's Urban Design Policy" is added. Clearly the intent is to pre-emptively make way for urban development of these farms. There can be no other reason to remove the protective wording. We need to advise that this is an extreme fundamental shift to spatial planning of the Durbanville area which potentially has huge consequences for residents in terms of cultural heritage, lifestyle and wellbeing. The omission has not been highlighted during the public participation process (PPP) but simply swept away in the detail of one voluminous draft to the next, without explanation.	Northern	No change required to MSDF.	In line with the view of the National and Provincial Department of Agriculture, the Department of Environmental Affairs & Development Planning at the Provincial Government, the protection of agricultural land will be promoted. Tourism and agri-tourism land uses will continued to be allowed.	
Durbanville Community Forum	External	The spatial vision of the area does not include the urban development of heritage wine farms and the cultural landscape. There is no good reason for the wording to be stealthily omitted from the Final NSDF and it needs to be reinstated.	Northern	No change required to MSDF.	In line with the view of the National and Provincial Department of Agriculture, the Department of Environmental Affairs & Development Planning at the Provincial Government, the protection of agricultural land will be promoted. Tourism and agri-tourism land uses will continued to be allowed.	
Mitchell's Plain Chamber of Commerce	External	We demand a commitment to accept the Master Plan (Vision 2076) of Mitchell's Plain as the overarching guiding road map to our long term self determination and self sustainability.	KMP	No change required to MSDF.	Forwarded to DSDF Team for consideration.	
Mitchell's Plain Chamber of Commerce	External	All Spatial Development Framework considerations need to consider the entire Phillipi Horticultural Area as part of the assets of Mitchell's Plain. We know and understand that the communities within Samaro Machel, Heinz Park and Phillipi are also starting to consider themselves as part of Mitchell's Plain and we are prepared to embrace them. This would take our northern boundaries to Govan Beki Drive and move the Jakes Gerwel Boundary to the M10 – Eisleben Interchange. This needs to be considered.	KMP	No change required to MSDF.	Forwarded to DSDF Team for consideration.	
Mitchell's Plain Chamber of Commerce	External	Seal Island is part of Mitchell's Plain. It is the Southern most point – at which location we believe a Light House needs to be built. A pier running from Seal Island, allowing tourist access on a broad surface that can be travelled on bicycle and golf carts must be considered. The Tidal Pool at Strandfontein Pavillion represents a node that should be connected to Seal Island via this pier. A secondary ocean retaining wall running eastwards should create a space wherein wealthy yacht owners can moor their yachts and the Mitchell's Plain boating associations can moor their vessels in sufficiently deep waters that have been calmed by the by the construction of the pier connected to the land and the wall separating the bay from the rest of the ocean.	KMP	No change required to MSDF.	Forwarded to DSDF Team for consideration.	
Mitchell's Plain Chamber of Commerce	External	the Spine Road arterial is important, but not as important as the development of either the Baden Powel arterial or Lukannon Drive. While the Strandfontein Pavillion is the catalyst that kicks off 5 decades of development, it is important to visualize the result now!	KMP	No change required to MSDF.	Forwarded to DSDF Team for consideration.	
Mitchell's Plain Chamber of Commerce	External	We agree with the idea of nodal development. The radically underdeveloped beach starting at Strandfontien and continuing to Mnandi Resort needs to be tackled as part of a single Master Plan and not used to sponsor separate initiatives with separate outcomes. The development of a Waterfront that creates a strong marine-based economy within this 5km stretch and the southern boundary pushed 8km seaward will create an international destination point for the wealthy to come and play. It will also create the environment within which boat building and repairs will flourish. Our Vision 2076 roadmap outlines 5 decades of Oceanic and Land Based infrastructure development and construction	KMP	No change required to MSDF.	Forwarded to DSDF Team for consideration.	
Mitchell's Plain Chamber of Commerce	External	Mitchell's Plain needs a clearly defined industrial zone. This has to be at least 0 hectares large. We believe that the old Denel Land is ideally positioned for an Industrial zone. It is our considered recommendation that at least 100 hectares of land be reserved in and around the old Denel land for the industrialization of Mitchell's Plain and for the heavy current bulk infrastructure to be created that will feed from and deliver to the national electrical grid.	KMP	No change required to MSDF.	Forwarded to DSDF Team for consideration.	
Mitchell's Plain Chamber of Commerce	External	The plans and proposals our community have put forward for Erven 1212 and 1213 are critical for the long-term economic growth of our community. It is absolutely essential to start planning for Gap housing in the format of 7 to 12 storey structures. The landscape of Mitchell's Plain is going to change. We are already seeing cranes busy erecting structures, these will just grow in height. It is essential that we cast our minds forward to a time when it is the norm.	KMP	No change required to MSDF.	Forwarded to DSDF Team for consideration.	

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Mitchell's Plain Chamber of Commerce	External	There is a piece of land on the corner of Siberian Road and Park Avenue in Rocklands that the Knights of Da Gama have identified as a possible location for a shelter that also provides a skills development facility for the local community.	KMP	No change required to MSD.	Forwarded to DSDF Team for consideration.	
Mitchell's Plain Chamber of Commerce	External	Plein Chamber has a proposal from our members for an earmarked piece of land on the corner of Highlands Drive, turning north into Eisleben Road which we agree can be utilized for a building which can be erected to just this kind of project. These welfare organizations will have a headquarters which can serve as a base for them to meet, plan, possibly house and feed the homeless etc. The entrance should be accessible via Eisleben road.	KMP	No change required to MSD.	Forwarded to DSDF Team for consideration.	
Mitchell's Plain Chamber of Commerce	External	the bridge linking Colorado Park and Samora Machel should be re-designed into a walk-over bridge. Hijackings, robberies, car-jackings and all the ills of society has increased in the area, and the main getaway is that particular bridge	KMP	No change required to MSD.	Forwarded to DSDF Team for consideration.	
Mitchell's Plain Chamber of Commerce	External	Mitchell's Plain needs its own Heritage and Cultural Centre at which professional theatre productions can be hosted. We need a museum of our people that ensures that our history and heritage are recorded and protected. This should be part of the Master Plan that includes the development of the False Bay coast, possibly closer to the Blue Waters section, close to the Blue Waters Resort and include the enhancement and repair of the Blue Waters amphitheatre.	KMP	No change required to MSD.	Forwarded to DSDF Team for consideration.	
Mitchell's Plain Chamber of Commerce	External	It is then of extreme importance that the rail transport system be given priority over the MyCiti. It is also of equal importance to implement traffic management systems such as traffic circles and lights to ensure the smooth flow of traffic.	KMP	No change required to MSD.	Forwarded to DSDF Team for consideration.	
Mitchell's Plain Chamber of Commerce	External	The connection to Retreat through the R300 is long overdue. Before any major developments happen along the farmland, it must be understood that this route has been considered and delayed consistently for decades. The R300 as a fly-over from Jakes Gerwel Drive to Muizenberg (Southern Suburbs) was mentioned a few years ago and this project should be reconsidered. The advantages would be as follows	KMP	No change required to MSD.	Forwarded to DSDF Team for consideration.	
Mitchell's Plain Chamber of Commerce	External	The Swartklip Indoor Sports Centre and Sports Grounds on the other hand is a white elephant. It has the potential to provide Mitchell's Plain with olympic quality training grounds with the facilities to host large scale music festivals. And yet the fence is non-existent, the facilities are under-utilized and there is no plan known to the community to enhance this tarnished gem. The Swartklip Sport Grounds need to be not just brought up to standard, it needs to have a public private partnership between the community, business, the sports & media industry and the city. Events needs to be hosted that brings the media in to broadcast these events internationally. A Cycling track with an annual cycling competition starting at this venue and returning to this venue would bring tourists in.	KMP	No change required to MSD.	Forwarded to DSDF Team for consideration.	
Private	External	Ek is n werknemer op n groente plaas. Ek ry elke dag weltevrede weg en daar is doe wat ek vrees vir my lewe. Hier het Al soveel kapings plaas gevind en is so baie protes aksie van isiolo nedersetting dat dit doe onmoontlik is om aan te meld vir diens agv pacie wat gesluit word. Dit is onaanvaarbaar dat dat die regering kan toe laat daar nog plakkers op weltevrede weg geplaas word en die veiligheid van ons as publiek en werkers wat op n eerlike manier n inkomste probeer verdien vir ons wil bemoeiilik. Die lewe is klaar swaar en moeilik nou wil dit nog moeiliker gemaak word. Ek is teen sterkte gekant teen die voorstel van weltevrede wedge wat vir nog plakkers wil plek maak.	Cape Flats	No change required to MSD.	Forwarded to DSDF Team for consideration.	

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Private	External	Ek is gekant daarteen dat Prassa die plakkers vanaf die spoorlyn na ons area wil skuif. Ons area het reeds in die laaste paar jaar so onveilig geraak as gevolg van die plakkerskampe om ons. Ek moet elke oggend op die paale gaan met my 2 Kinders en menigte oggende word die pad versper deur brande en bakstene en dan kan ons nie die area verlaat nie en sit ek met 2 klein kindertjies in daai gevaar. Ek Kan nie by verkeers ligte dood stop nie want dit is n high risk area vir high jacking. Ons elektrise kables word weekliks gesteel, of die transformers blaas as gevolg van onwettige connections wat hul in die aande aanle deur slofe in weltevreden weg te kap. Ons gee baie mense werk en voorsien baie mense van voedsel. Ons het genoeg probleme, ons kan nie nog Prassa se probleme ook ons sin maak nie. □	Cape Flats	No change required to MSDF.	Forwarded to DSDF Team for consideration.	Human Settlement Department
Private	External	Ek woon en boer in Philippi langs Weltevreden weg vir die laaste 40 jaar. Ek staan die besluit om nog meer plakkers na weltevreden weg te skuif, sterk teen. Ons sit reeds met soveel probleme as gevolg van die bestaande plakkerskampe by ons. My produk word daaglik gesteel, nie net in die aande nie, hulle steel helder oor dag. Ons Pompe en boorgate word oop gebreek en gesteel. Om dit te vervang raak net te duur. As dinge so aanhou gaan dit vir ons boere onmoontlik raak om te boer en dit sal maak dat daar n voedsel tekort sal wees en groente baie duur sal raak. Om nie te praat van die hordes ongeskoolde mense wat sonder werk sal sit as ons moet ophou boer nie. Prassa moet n ander plan maak maar hulle kan nie die plakkers van die spoorlyn hierheen skuif nie. Dit is n landbou area.	Cape Flats	No change required to MSDF.	Forwarded to DSDF Team for consideration.	Human Settlement Department
Private	External	As a resident of the area, I find the city's intention to encourage single residential in an area that effectively works as a suburb because of the healthy mix of single and general residential worrying. The area works. If the city allows too many flats the area will no longer work and will turn into Wynberg or Woddstock, areas that do not work with massive social issues. The current blend in this area works. If the city need to develop land the city need to use their own land and give that development rights. There is so much land earmarked for road widening with no road widening planned. These properties must be developed either sold with large rights awarded by the city or developed as public private partnerships. The city should rezone the Claremont bowling club and allow the owners to develop, another unused underutilised parcel of land. Sort out district six, develop it. The city need to focus their energy on their own and provincial land. Don't destroy a perfectly good area.	Southern	No change required to MSDF.	Forwarded to DSDF Team for consideration.	Human Settlement Department
Private	External	I wish to take this opportunity to comment on the recent proposal and highlight some disturbing issues. The developers are hunting and exploiting quiet residential areas and putting up various types of developments from care homes and Multi small appartments and townhouses. This is not densification for the poorer under privileged masses seeking to find homes in safer areas with less crime and drugs etc I wonder how much thought has gone in to these processes and densification is used in a wide form and is not specifically geared to creating what is necessary...I wonder how much thought is given to overburdening already overloaded infrastructures with additional water electricity and waste disposal with all these unnecessary additions. The thought process behind the people in authority rubber stamping these applications gives some serious concern as to how they are thinking of the burden to the future infrastructure. I am sure that the purpose and original thought to this programme was not to do what is being done but to supply more affordable housing\accommodation to the masses not for the planners and developers to line their pockets with these small overzealous overcrowded overpriced establishments they are erecting wherever they see the gap.	Metro	No change required to MSDF.	The MSDF attempted to acknowledge the pressures on engineering infrastructure capacities in Chapter 6. The City has a whole department called the Corporate Project, Programme & Portfolio Management Department dealing with oversight of the projects from line department specialist. This unit also caters for a Specialised Engineering Unit.	
Private	External	The PPP is severely flawed - running a process concurrent with the DSDF Review Process is wrong. If the DSDFs are to be approved under a new MSDF then the new MSDF must be approved prior to submission of the DSDFs, otherwise the DSDFs would need to conform to the current, approved 2018 MSDF. This MSDF Review process should have come first but now we have to comment on 2nd Draft DSDFs and 1st draft MSDF documents at the same time - very confusing for the general public and unlikely to elicit informed comment	Metro	No change required to MSDF.	The Council-approved 2018 MSDF provided the baseline for the 2019-2021 update of the 2012 DSDFs. The 2018 and 2022 MSDFs are very similar ito of principles and for structuring the long term spatial vision. There were 90 days of commenting on the MSDF and 150 days of commenting on the DSDF whilst the legal requirement is only 60 days for each.	
Private	External	I fully support the continued focus on Inward Growth and TOD principles in the new DrMSDF_v1.	Metro	No change required to MSDF.	Noted	

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Private	External	I support the introduction of a Green Infrastructure Network	Metro	No change required to MSDF.	Noted	
Private	External	I do not support the extension of the IG&CA into the 2018 MSDF identified DGA, north of the R312 (Fisantekraal). This area is alongside the Mosselbank River and has a large network of associated permanent and temporary wetlands. In the new DrMSDF it falls within a cultural landscape and the Green Infrastructure Network.	Northern	No change required to MSDF.	Most of the North Eastern Corridor's land parcels are already in EIA stage and especially the most northern development of Bella Riva already has an Environmental Authorisation.	
Private	External	I have noticed the omission of Map G1 from the 2018 MSDF, Developed, Developable and constrained land, in the new DrMSDFv1. This Map is very useful for District and Sub-District Planning/Comments. Is there an updated Map that can be included in the new MSDF?	Northern	No change required to MSDF.	No similar information is not available for the 2022 document. The 2018 Map G1 – Developed, Developable & Constrained Land – has been omitted from the MSDF in 2022 as the category "developable" is dependent on many variables and to define an extent for this category is therefore problematic. We encourage you to refer instead to the informant maps 5a-g in the MSDFs and DSDF maps for a better sense of the suitability of an area for development.	
Private	External	I do not support the draft UDE in the Northern District. The re-introduced UDE follows the IG&CA edge, but in the area north of the Joostenbergvlakte small holdings there is no bulk road infrastructure to support new developments in the short to medium term (10-15 years). The UDE should be aligned with realistic 'new development areas' for the duration of the plan. In 1997 when the original urban edge was promoted, the residents of Joostenbergvlakte requested that the eastern urban edge be the Malmesbury Railway line. The edge was located just east of the JBV smallholdings and we were assured that the smallholdings were seen as a buffer between urban development and the winelands. The UE was changed several times after that and in 2012 included CBAs around Fisantekraal. The further expansion of the UDE northwards is contrary to the Inward Growth Vision and TOD Principles promoted in the new DrMSDFv1. I would like to propose a UDE that supports, rather than contradicts, the vision and policies of the MSDF viz the Malmesbury Railway line and current extent of approved urban development in Fisantekraal.	Northern	No change required to MSDF.	Since the 2012 MSDF and DSDF the 2 growth corridors North East (north of Fisantekraal) and North West (Up the N7 to Atlantis) have been reviewed. In 2018 the Council contracted the edge predominately due to the danger or allowing too many permanent residents and land uses into the 16km zone around Koeberg. This placed more pressure on the City considering to allow new development areas in the NE corridor and development in an eastern direction. There is a large effort in retaining the urban development edge and it has been brought back into the MSDF 2022.	
Private	External	Two errors in the DrMSDF Vol1&2_v1 have been noticed (see below). Rigorous cross checking of documents is essential - density map B4 pg 18 Vol2 - a polygon within the Joostenbergvlakte smallholdings shows a density of 100, residents plus labour, per hectare. I've lived in JBV for 30 years and this is not possible. The erven are each approximately 1ha, residential properties. Also maps B2 & B3 need to be checked as B2's 100 residents/ha does not match B4's 100/ha (residents plus labour) i.e. there should be more not less areas identified. - Map 5c, pg 75 of Vol1_v1, the urban footprint is incorrect north of JBV	Northern	The maps have been corrected	Maps have been corrected as far as possible.	
Private	External	Across all the draft MSDF (and NIDSDF) documents, including in the Maps, as well as in the approved 2018 MSDF, the Malmesbury Railway line from Kraaifontein to Malmesbury is referred to as an 'Existing Passenger Railway Line'. As far as I am aware this Railway Line is currently under Transnet Control and only functions as a 'goods' transport line. PRASA has not yet committed to taking over control, and significant upgrades to the line, existing stations and the building of new stations, are required for it to function as a Passenger Railway Line. Since PRASA appears to have no budget for this in the short to medium term, this is a long-term possibility and the designation on maps (and in reports) needs to be changed to 'Future Passenger Railway Line'. This has a direct impact on applying TOD principles to development applications that are in fact not located in TAPs. I trust that this error will be corrected in the 2nd Draft MSDF documents circulated for comment.	Blaauwberg	The Prohic Right of Way layers were improved	The officially advertised and published public road of way, including the City's future road and rail layer were upgraded to, although the data is slightly older.	
South African National Biodiversity Institute (SANBI)	External	SANBI derives its mandate from the National Environmental Management: Biodiversity Act No. 10 of 2004. SANBI is mandated, inter alia, to act as an advisory and consultative body to organs of state and other stakeholders on matters related to biodiversity. SANBI appreciates and supports the focus on the importance of biodiversity and its protection in the Cape Town Spatial Municipal Development Framework (MSDF). Overall, the MSDF has incorporated Critical Biodiversity Areas and Ecological Support Areas well and our brief comments below are to strengthen this integration and to also bring in the concept of Strategic Water Source Areas into the MSDF	All	No change required to MSDF.	Noted	

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South African National Biodiversity Institute (SANBI)	External	We would like to recommend that surface and ground water Strategic Water Source Areas (SWSA) be integrated into the MSDF. SWSAs can be considered the "water factories" of the country and although they account for only 10% of the surface area of the country, they contribute to 50% of the national water supply, support 50% of the population, and 64% of the economy. In addition, the National Spatial Development Framework had identified Critical Biodiversity Areas (CBAs) and SWSAs as priority National Ecological Infrastructure Regions that are of national importance and development. Within the City of Cape Town there are a number of surface (Boland and Table Mountain) and groundwater (West Coast Aquifer, Southwestern Cape Ranges, and Cape Peninsula and Cape Flats) SWSAs that the MSDF needs to consider (please see attached maps and please contact us for the GIS shapefiles).	All	?	In 2020, the City of Cape Town appointed a Professional Service Provider to develop a Groundwater Protection Scheme which is made up of Groundwater Protection Zone (GPZ) delineations, vulnerability mapping, and detailing preliminary existing Potentially Contaminating Activities (PCAs). The GPZ is subdivided into different zones based on the risk imparted on the drinking water source. Each zone requires different assessment, protection, and management measures. The risk of groundwater source contamination has a direct link to land-use and increases with human activity. GPZs aim to protect the CCTs drinking water sources by controlling land-use in the capture zone. These are shown on MSDF map 5c to highlight where land uses must be controlled rather than the Strategic Water Source Areas (SWSA) as there is no way to limit land uses and protect the entire SWSA extent.	City's document centre has many reference document. Search for theme of interest.
South African National Biodiversity Institute (SANBI)	External	The MSDF in the acronym list refer to Critical Ecological Support Areas (CESA) and Other Ecological Support Areas to refer to Ecological Support Areas. The Lexicon of Biodiversity Planning in South Africa, 2016 (http://biodiversityadvisor.sanbi.org/wp-content/uploads/2016/06/2016_06_02-Lexicon.pdf) defines Ecological Support Area are defined as: An area that must be maintained in at least fair ecological condition (semi-natural/moderately modified state) in order to support the ecological functioning of a CBA or protected area, or to generate or deliver ecosystem services, or to meet remaining biodiversity targets for ecosystem types or species when it is not possible or no necessary to meet them in natural or near-natural areas	All	Minor changes on MSDF text.	Updated	
Private	External	Objections to residential development in the Weltevreden Wedge: The PHA is not conducive for residential and farming next to each other. Originally Government identified the Wedge for commercial and industrial activities to create workplace closer to residential areas. It is much easier to manage the two activities next to each other. Good examples are Sheffield Park and or the Airport Industrial area. It would be a much better solution for the protection of the PHA. What planning decisions have been made from 2012 regarding the urban development of the Wedge? There is no road network, electricity network, water or sewerage networks to support 40 000 new homes on the wedge. The current SAPS in Philippi are an example of a service that cannot serve the citizens in jurisdiction area adequately without adding an additional 300000 people!	Cape Flats	No change required to MSDF.	The MSDF highlights that the Wedge will be for urban development, but the Cape Flats DSDF contains more information on the type of urban development.	
Cape Nature	External	CapeNature is satisfied with the draft MSDF. No further comment.	All	No change required to MSDF.	Noted.	
Private	External	The City is focussed on tweaking an out of date apartheid public transport system to be more efficient and economical. There appears to be no thought to reducing the distance to work nor the inconvenience and discomfort of the users. The emphasis should be on making more time available for family time and allowing the worker to arrive in a better state of mind. Let me show what needs to be addressed. a. Wasted hours for the poorer communities spent in queues and travel time. All at the expense of family time. b. Leaving and arriving home in the dark and cold in winters. c. Spending a high proportion of their low wages on transport. d. Exposure to unhealthy cramped conditions in taxis/ buses/trains at a time of higher projected temperatures (internationally this is recognised as a major health risk) e. Exposure to criminal elements in the crowded conditions f. Increased motor vehicles congestion on roads leading to more pollution. □	All	No change required to MSDF.	The City's Comprehensive Intergrated Transport Plan (2018-2023) is under review.	City's document centre has many reference documents. Search for theme of interest. City of Cape Town Document Centre: Human Settlements Sector Plan
Private	External	You have presented us with a longwinded draft which tends to confuse more than enlighten the public. My response is long because I wanted to ensure that my views would be correctly interpreted. If any of my observations are already embodied in the MSDF document in the same context it will merely confirm that I got lost in the narrative. The Executive Summary was a good idea.	All	No change required to MSDF.	Noted. The MSDF is a spatial articulation of multiple sector-specific policies, strategies and action or implementation plans available in every single of the sector-specific line departments. A summary of those are available in Technical Supplement D, Vol II of the MSDF. But the MSDF only extracts the key principles from these documents and reflects that spatially.	

DEPARTMENT/ ORGANISATION	INTERNAL/ EXTERNAL	SUMMARY COMMENT	DISTRICT	CHANGES MADE ON THE MSD/DSDF	RESPONSE	COMMENTS FORWARDED TO <DEPT> NAME OR LINK TO DOCUMENTS ON WEB
Private	External	It is a travesty that the City has so little concern for the frustrations and stresses the current transport system creates. The City is only intent on reducing the time factor by a relatively small amount. Look at this problem in a holistic way. The emphasis should be on reducing the transit distance and the need for large numbers of people travelling in the same direction. To reduce this transit distance, the City must consider a dramatic change in city structure from a centralised to a decentralised city. If you study Map2g, the CBD is outside the square of the residential areas and has a very narrow access to the CBD. This is inefficient and is the root cause of traffic congestion, wasting time and fuel. Any small accident will affect a very large part of the travelling population. This change will reduce the City's carbon footprint significantly, which is in line with the Paris Accord. This change in structure cannot be done easily and will impact on the economics of the CBD, but it will provide new opportunities for jobs creation.	All	No change required to MSD.	The expansion of the nodal structure of Cape Town is Chapter 3, Vol I of the MSD. Please also refer to the DSDFs for the neighbourhood nodes and where those are positioned enhancing the multi-nodal character of the city. Refer to Technical Supplement B, Vol II of the MSD. The City has the following: * Climate Change policy (2019-20); * Climate Change Strategy (2021); and * Climate Change Action Plan (2021). * Carbon Neutral 2050 Commitments (2020). Please refer to the Environmental Management Plan components of each of the DSDFs. The City of Cape Town State of the Environment Report (2022), may give further insights.	
Private	External	With the extreme weather patterns experienced all over the world, I would have expected that the starting point to have been a climate risk assessment. There appeared to be no reference to this. Let me highlight the health and happiness issues. This has become more necessary with the increased population and increased disparity in wages.	All	No change required to MSD.	Refer to Technical Supplement D, Vol II of the MSD. The City has the following: * Climate Change policy (2019-20); * Climate Change Strategy (2021); and * Climate Change Action Plan (2021). * Carbon Neutral 2050 Commitments (2020). Please refer to the Environmental Management Plan components of each of the DSDFs. The City of Cape Town State of the Environment Report (2022), may give further insights.	City's document centre has many reference documents. Search for theme of interest.
Private	External	In support of higher utilisation of the buses, the City has been looking at economic housing nearer to the CBD, but the property rates will be too expensive for this poorer sector of the population. This will create economic hardships. In addition, being far from their communities, it will develop social problems especially with residents from surrounding suburbs with whom they will have little in common. The obvious answer is to create jobs – in offices and manufacturing – near their homes. This can be incorporated in the City's proposed concept of Metropolitan Nodes and Clusters. The nodes should be self-sustaining with services for the immediate community (more job opportunities). The industrial areas should dovetail with these nodes and clusters. Travel within these nodes, clusters and industrial areas should be by cycling or walking along green tree paths. Make nodes and clusters shopping and social experiences with wide pavements and greenery. Ban cars in the main shopping street. Only public transport should be allowed in this street. The development of District 6 should be along these lines. From what I have seen there is already a cycle infrastructure planned. This should be extended with only public transport along the main road. Cars should be routed around it.	All	No change required to MSD.	The City is in process of facilitating the District Six Public Realm Study.	City's document centre has many reference documents. Search for theme of interest.
Private	External	You target densification as a means to improve the economics of the bus system but I suspect that higher property rates for the City is the real driver. However, based on what I have seen in the Southern Suburbs this policy has annoyed the residents and is eroding green space and reducing the canopy. You are not going to persuade the new owners of these smaller properties to become bus users. They are affluent enough to be dedicated car users. They love to show their fancy cars, SUVs and 4x4s. All of which have high carbon footprints. Additionally many take their children to school because the streets are not considered safe. Introduce extra policing so that the children can walk or cycle to school. This is good for their health and they can socialise more. The parents can find alternative transport to work or work from home. Hence you must change the CT culture of fancy car ownership. Working from home or shorter working weeks should be included in the thinking and encouraged.	All	No change required to MSD.	Suggestions noted and incorporated into the DSDFs and LSDFs.	

DEPARTMENT/ ORGANISATION	INTERNAL/ EXTERNAL	SUMMARY COMMENT	DISTRICT	CHANGES MADE ON THE MSDF/DSDFS	RESPONSE	COMMENTS FORWARDED TO <DEPT> NAME OR LINK TO DOCUMENTS ON WEB
Private	External	This is the cause of global warming. Aggressive actions should be taken in line with the Paris Climate Accord and the subsequent COP meetings. As far as I know, no action has been taken and there was no plan in your document. All the comments under pollution, will also automatically reduce GHG emissions. But more needs to be done if we are to keep temperature increase below 1.5 degrees. It is already too late. The world is at 1.25 degrees and will reach 1.5 degrees C by 2030. At this rate temperatures will exceed 2.0 degrees long before 2050. CT must do more towards temperature reduction. Eliminating ICE vehicles is essential. Move to EV or hydrogen urgently. Just targeting carbon neutrality by 2050 will not be enough. Work with nature in absorbing GHG and pollution as follows.	All	No change required to MSDF.	Refer to Technical Supplement D, Vol II of the MSDF. The City has the following additional and detail specific documents: * Climate Change policy (2019-20); * Climate Change Strategy (2021); and * Climate Change Action Plan (2021). * Air quality Management Plan (2005) under review. * City's Carbon Neutral 2050 Commitment (2020) is available. Please refer to the Environmental Management Plan components of each of the DSDFs.	City's document centre has many reference documents. Search for theme of interest. City of Cape Town Document Centre: Human Settlements Sector Plan
Private	External	Fossil fuel is a killer. However to wean the economy off this energy source is not an overnight affair. It will take years. Unfortunately global warming is already a fact and immediate action must be taken. Pollution is currently killing millions of people a year (9 million worldwide in 2021) and it is happening in Cape Town as well. Decentralisation will reduce pollution and the carbon footprint substantially, but the MSDF must include an urgent plan to reduce pollution for immediate implementation. The Paris Climate Accord mandated this in 2015 and this has been reinforced with every subsequent COP meeting. I don't know what CT has been doing, because there is no reference to this aspect. I must assume nothing has been done and there is no plan. If I am wrong, please surprise with the details. The only reference on fossil fuel in your MSDF was in terms of renewable electricity generation and I agree with the City's proposals. Nuclear energy should be part of the mix to provide a stable form of base load. Higher ambient temperatures will reduce the effectiveness of solar and hydro power. It's already in the news. Decentralisation with an efficient public transport system is the backbone for a lower carbon footprint. Follow the leads of other major cities on quick reduction in green house gases and other pollutants as follows	All	No change required to MSDF.	Refer to Technical Supplement D, Vol II of the MSDF. The City has the following additional and detail specific documents: * Climate Change policy (2019-20); * Climate Change Strategy (2021); and * Climate Change Action Plan (2021). Please refer to the Environmental Management Plan components of each of the DSDFs. The City of Cape Town State of the Environment Report (2022), may give further insights.	City's document centre has many reference documents. Search for theme of interest.
Private	External	City must target the following :- - Health and happiness of its citizens. We must be pro-active and dictate what is required for the health of all our citizens. - Healthy soil should be our top priority. It is the foundation for a healthy resilient environment and tree canopy. Stop blaming invasive species. - Reduce travel distances for work and social activities. Reduce our carbon footprint. - Remove all fossil fuel uses within a finite period - Aggressively introduce cycling to all citizens especially in poorer communities One of the aspects that should be under discussion, is whether a restriction should be imposed on incoming populations. Finally, a climate risk assessment should be completed before a final MSDF is approved.	All	No change required to MSDF.	A key building block of the MSDF is the Areas of Agricultural Layer which reflects areas essential for agricultural land use protection. Reducing the distance between work and home is a key component of the TOD strategy, underlying the MSDF. Cycling routes are in the ITP. Urbanisation pressures in Cape Town is documented in Technical Supplement F, Vol II of the MSDF. There are various Climate Change documents. Refer to Technical Supplement B, Vol II of the MSDF. The City has a: * Climate Change policy (2019-20); * Climate Change Strategy (2021); and * Climate Change Action Plan (2021). Please refer to the Environmental Management Plan components of each of the DSDFs.	City's document centre has many reference documents. Search for theme of interest.
Parkscape	External	While the Executive Summary of the MSDF clarifies key elements of the Framework, the MSDF in its full detail comprises a series of dense and often confusing documents, which may be beyond the reach of many laypeople, as well as being time-consuming to read. I personally found the documents a challenging read and was lost at several points along the way. Further, the documents are presented at what appears to be the tail end of a process, thus raising legitimate questions about the accessibility and nature of the public participation process per se.		No change required to MSDF.	The key message in the MSDF 2022 was already confirmed by Council in 2018 and this is only an update. The 2018 MSDF was taken in 2019-2021 as basis for the DSDF review - a process which reviewed the 2012 documents. This round of MSDF advertisement was only to emphasize the changes rolled up from the very thorough consultation process of the DSDF and to alert on technical updates.	
Parkscape	External	The City of Cape Town purports to be a "caring city", but it seems there are limited actions to improve the health and wellbeing of urban residents at a time when the world is under increased stress from increased pollution, climate change, and increased violence. Any city professing to care for its citizens must take the social and environmental landscape into account and across multiple levels, yet it is hard to see that the Draft MSDF does this.		No change required to MSDF.	Refer to Technical Supplement D, Vol II of the MSDF. The City has the following: * Climate Change policy (2019-20); * Climate Change Strategy (2021); and * Climate Change Action Plan (2021). Please refer to the Environmental Management Plan components of each of the DSDFs. The City of Cape Town State of the Environment Report (2022), may give further insights.	City's document centre has many reference documents. Search for theme of interest.

DEPARTMENT/ ORGANISATION	INTERNAL/ EXTERNAL	SUMMARY COMMENT	DISTRICT	CHANGES MADE ON THE MSDF/DSDFS	RESPONSE	COMMENTS FORWARDED TO <DEPT> NAME OR LINK TO DOCUMENTS ON WEB
Parkscape	External	In order to create a socially and economically well-functioning City must target the following: - Physical and mental health and wellbeing of its citizens. - Increased urban forest and more and more easily accessible greenspaces in line with "15 Minute Cities", the "10 Minute Walk" concept and the "3:30:300" concept. - Introduced species play a critical role in our urban environment. Fynbos conservation must be balanced with urban needs and reality, including the retention and planting of both introduced and indigenous trees. - Decentralise the city and create urban nodes that provide a variety of opportunities for residents thus reducing transport congestion, pollution and carbon footprint. - A climate risk assessment should be completed before the final MSDF is approved. □		No change required to MSDF.	Refer to Technical Supplement D, Vol II of the MSDF. The City has the following: * Climate Change policy (2019-20); * Climate Change Strategy (2021); and * Climate Change Action Plan (2021). Also a Bioregional Policy and Plan (2015) and maintained Bionet. The City of Cape Town State of the Environment Report (2022), may give further insights. Urban nodes are addressed in Chapters 1-6.	City's document centre has many reference documents. Search for theme of interest.
Parkscape	External	KEY CONCERNS • A strong focus on economics and profit to the exclusion of urban and human health and well-being, which is counter-intuitive and ultimately counter-productive. • A repetition of apartheid era planning which densifies areas already under significant pressure and which lack greenspace. • Too great a focus on urban densification at the cost of greenspace creation and maintenance, transport and access, critical facilities such as schools and clinics (which can incorporate greenspace for well-being). • The destruction of existing blue-green and greenspaces in a bid to densify the urban environment. • The creation of insufficiently serviced and increasingly densified dormitory suburbs that show neither thought of reducing the distance to work nor the inconvenience and discomfort of the users. This perpetuates an apartheid era transport systems that is beset by: o Issues of access and transport that result in increased traffic congestion and thereby pollution o The implications of time and cost to commuters, particularly those from poorer communities o Increased health and safety risks resulting from increased congestion in modes of transport – buses, taxis, trains o Residential densification exclusive of the creation of new and easily accessible commercial hubs within communities that provide local opportunities for residents, and which would address the points above.		No change required to MSDF.	Please refer to Technical Supplement F, Vol II of the MSDF for a confirmation that the pressures of urbanisation is well known to the City. Densification is unfortunately a given. The MSDF has a strong focus on balancing environmental protection and urban development/ urban growth management. The Environmental Management Frameworks in the DSDF is a good example of balancing these priorities.	

MSDF DSDF SUMMARY OF INPUTS FROM WORKSHOPS

Workshop	External					
Workshop	External					
Workshop	External					
Workshop	External					
Workshop	External					
Resident	External	The City needs to put significantly more focus on incentivising affordable housing in areas with more feasible land costs (i.e. outside the city centre and areas with 'hot' property markets). While there is affordable housing development occurring in Maitland, this is driven by a larger developer who has acquired multiple land parcels in the area, and there needs to be greater focus on incentivising smaller developers in Maitland, Brooklyn, Rugby, Kensington, and Athlone (particularly along Klipfontein Road, Jan Smuts Drive and Belgravia Roads, where there is already small-scale development growth that needs enabling City support	MSDF	No change required to MSDF.	It is acknowledged that small scale developers are challenged in different ways compared to larger developers. The City, through its MSDF and DSDFs implementation frameworks, prioritises the investigation of a suite of incentives for spatially targeted development focus areas, where the aim is to facilitate and encourage investment (including improving the supply of affordable housing). Much of the incentives and reforms within the control of the City come in the form of tailored regulatory processes or a bespoke set of development rules that reduce the length of development management process, and by extension the associated costs of the process. Thereby reducing the risks and certainty associated with development. A process is underway to investigate the application of an 'Integrated Overlay Zone' to identified Development Focus Areas that would stand to benefit from such incentives. The MSDF Table 6.1 identifies the designation of the UIC as the City's priority and preferred (Restructuring Zone) location for allocation of Capital Restructuring Grant (RCG) funding, to support social housing initiatives. This strategic intent supports the Human Settlement Strategy to focus on the City as an enabler of (private housing actors) affordable housing development.	
Resident	External	The City should also consider removing the City centre, Woodstock, Salt River and Observatory from the delineated UDZ, and cadastral define an extension of the UDZ close to the main routes in the well-located areas above. □	MSDF	No change required to MSDF.	The City's 2019 performance review of the UDZ tax incentive identified that the UDZ delineation and its operation is too static and needs to be tracked against property market cycles to ensure that the areas of market strength are not being over-incentivised relative to its original intent to stimulate inner city urban regeneration through urban real estate investment. In this regard, and considering the space limitations of delineating the UDZ boundary by SARS via the Income Tax Act, Council approved several spatial redelineation recommendations based on a series of scenarios. These included the expansion of the UDZ to areas more in keeping with the original intent of the UDZ, such as Maitland, Brooklyn, Rugby, Wynberg, etc. National Treasury is currently in the process of conducting its own review as to whether the UDZ should be continued beyond March 2023. Once there is finality on the future of the UDZ, opportunities to redelineate the incentive within Cape Town will be retabled with National Treasury.	
Resident	External	In the section discussing the Integrated Public Transport Network (IPTN) Plan (p38) and on Map 3.1: Integrated Public Transportation Network (2032) on p40, an ongoing blind spot of the City's transport-related planning surfaces, as no mention is made of how Golden Arrow bus services and minibus taxis (and their routes) integrate into the plan, thus indicating that the City has no real plan for inter-modality, and the IPTN is not truly integrated.	MSDF	No change required to MSDF.	As stated on page 38, the shifting consideration in planning for the next iteration of the IPTN is an emphasis on intermodality, which includes a focus on all forms of public transport rather than specifically on rail and BRT. This includes modes such as GABS, quality bus service and mini-bus taxi services. This concept will be articulated in more detail as part of the annual review process once the City's Urban Mobility Directorate has published its updated IPTN plan. Map 3.1 reflects the higher order public transport corridors which have been prioritised for implementation. The service which will ultimately operate on these corridors is not specified in the MSDF. Unfortunately, the MSDF metro scale is not appropriate to spatialise all roadbased public transport routes as this then starts to mirror the public road network at the metro scale.	
Resident	External	Map 3.4 : TAPs shown in relation to the existing and planned IPTN (2032), on page 46, does not show Golden Arrow and taxi routes, and therefore possible Transit Accessible Precincts (TAPs) for these routes are missing.	MSDF	Minor change to the MSDF text.	The comment around the existing TAPs not being representative of all areas served by public transport (specifically GABS and Minibus taxi) is noted. The TAPS map was developed for the current IPTN, but will need to be revised or replaced under the new IPTN. The outcomes of the IPTN process will inform updates to the MSDF in the annual review process. A clarification note will be added to the document. Investigating the possibility of updating the PT Areas with the latest available layers.	
	External					
WCPDF	External	1.DSDFs and MSDF do not really address economic development ito of implementation	1	No change required to MSDF.	The Integrated Economic Growth Strategy contains an Implementation Plan and lists of actions across all directorates. Implementation has started and once clarity exists about the limitations posed in the current spatial policy, such improvements will be accommodated in the next reviews.	City of Cape Town Document Centre: IEG54
WCPDF	External	2.Growth corridors Brackenfell to Stellenbosch via Koelenhof Growth node not considered (But nothing else than Botfontein..?)		No change required to MSDF.	Significant proactive delineation of new land for urban development has been recommended on the Bottellary Road between Brackenfell and Stellenbosch.	

MSDF DSDF SUMMARY OF INPUTS FROM WORKSHOPS						
WCPDF	External	3.Massive SANRAL investment along many intersections of N1 ignored from R 300 and beyond not optimized (Lucullus still just a road connecting a few small holdings..)		No change required to MSDF.	Additional land south of the N1 has been proactively delineated for urban development especially high employment land uses in the anticipation of the upgrades and the need for jobs related to Wallacedene, Scottsdene and Kraaifontein, Bloekombos. There is already a large provision for NDAs north of Kraaifontein. Once the investment comes to fruition, the market will have enough space as created in the MSDF and DSDFs to take up opportunities.	
WCPDF	External	4.Not clear capitalization on the R300 investment in the pipeline (what is going to happened with the new economic corridor?) No timelines set to connection over N7 to Blaawberg/ Sunningdale nodes and not timeline across Cape Flats to Southern Suburbs. What does this mean for Philippi? Look at what the R300 did to Brackengate et al		No change required to MSDF.	The CITP and IPTN is under review, once it reflects timelines and if adjustments to the spatial strategy is required, it will be accommodated in the next review.	
WCPDF	External	5.Cape Winelands Airport's growth not adequately credited		No change required to MSDF.	The UDE has been adjusted to include the airport as well as a large amount of new land has been included south west of the airport, which were not previously in the UDE.	
WCPDF	External	6.All documents silent about the N2 via Heldeberg and the unlocking required		No change required to MSDF.	SANRAL as well as the Urban Mobility Directorate, should be approached for technical information.	
WCPDF	External	7.Co-operation between spheres of government and buy-in of SOEs lacking		No change required to MSDF.	All SOEs were part of the Inter-governmental Steering Committee who were officially notified of the MSDF review process, were invited to comment and taken through all of the comments. The lack of their involvement in operational matter or implementation delays is not something the MSDF and DSDF can address.	
WCPDF	External	•Where are new growth areas/ growth energy		No change required to MSDF.	The new conceptualisation of the DFSA in the DSDFs are precisely for this reason.	
WCPDF	External	•What needs to be prioritized and put into place to support the new growth areas, like infrastructure		No change required to MSDF.	The Land Use Model is up for review and takes into account various growth trends in the built environment. The 20 year estimate progress into the Engineering Master Plan and Sector Plan Review processes which get fused with the Engineering Department's own assessment on growth and pressure areas.	
WCPDF	External	•Which other areas are isolated from this growth and still capture in poverty and what needs to be done to connect them to the opportunities		No change required to MSDF.	The USFAs in the DSDF entails the delineation of areas with sever backlogs and the listing of projects essential for implementation.	
WCPDF	External	•Where is the location of the current economic energy (private capital, health balance sheets, CEOs and decision makers who can push?) And how can it be connected to the new growth areas to create economic opportunity		No change required to MSDF.	The baseline documents of the DSDF and Technical Supplement F of the MSDF contains detailed analysis of the property market trends. These were used in the formulating of the MSDF and DSDFs.	
WCPDF	External	•>> how do we best use public investment to activate real economic return and release private sector capital to create jobs		No change required to MSDF.	Spatial targeting is part of the analysis of capital projects prior to approval. This way projects that will benefit large number of residents are getting preference.	
WCPDF	External	8.DSDFs lack population growth and semigration data. DSDF too theoretical and compliance documents		No change required to MSDF.	Refer to the DSDF Volume 1 and 2 and the MSDF Tech Supplement F.	
WCPDF	External	9.Environmental Exclusionary Areas (EEA) excluding requirements to obtain and EA, to be investigated. City has to listed activities which can be excluded from EA requirements so that infrastructure and development in the DFA and NDAs is not subject to compliance with EIAs or Env Manage Programs (DEA&DP);		No change required to MSDF.	The City is busy to apply to DEADP for the declaration of the UDE as the Urban Areas line as per the NEMA Regulations. However only some concessions will be possible.	
WCPDF	External	10.Also exclude listed activities wrt to wastewater treatment sites subject to compliance with EMPr approved by DEAD&DP; and excluding the requirement to apply to EA for emission licnseing in certain areas such as industrial zones (which now already have new data storage centres, new generation electricity generation etc)		No change required to MSDF.	Unfortunately the MSDF and DSDF cannot deal with the implications of national acts.	
WCPDF	External	11.Abuse of environmental constraints as structuring elements: City needs to develop a position on what constitutes high-priority environmental conservation areas and fund the maintenance and protections thereof.		No change required to MSDF.	Table A1 in the Tech Summplement A of the MSDF explains that the GINet is not a layer of information which can push an application into non compliance.	
WCPDF	External	12.Public participation and number of engagement were good but the style of engagement was fill box ticking.		No change required to MSDF.	Comment will be forwarded to the Public Participation Unit who owns the policy and methodology.	
WCPDF	External	13.In other places in the world communities are involved in active visioning of their areas. Citizens should be involved in discussion on national economic situation, inevitable urbanization (with or without formal planning) infrastructure backlogs, failure of public transport, prioritization of certain conservation areas (urban and environmental) and need to release other areas to balance economic growth.		No change required to MSDF.	This style of public participation is really only possible on precinct and maybe local area planning level. The UPD Department changes style with LSDFs, precinct plans and Local Area Planning processes.	
WCPDF	External	14.Put up a unit for Market Intelligence and Strategic Planning (reactivate ECAMP, build trust with brokerage & property development industry and give regular feedbacks). Create a demographic unit in partnership with province for population growth modelling, track the nature of all land use applications to understand growth, track all building plans to create view of investment, prepare analysis on future growth patterns by setting GIS live model.		No change required to MSDF.	Noted suggestion forwarded to management.	
WCPDF	External	15.Provide advice to executive leadership on where bulk infrastructure interventions should take place to facilitate growth projections and track economic response to infrastructure provision.		No change required to MSDF.	There is a whole infrastructure unit under the Project, Programme and Portfolio Management Department.	
WCPDF	External	16.DSDFs and MSDF too static not dynamic planning tools for sharing live economic data.		No change required to MSDF.	Economic data sharing platforms are going to be available in future and it will include spatial trends on built environment development.	

MSDF DSDF SUMMARY OF INPUTS FROM WORKSHOPS						
WCPDF	External	17.MSDF and SDFs should give growth through to medium term infrastructure framework. Current mismatch between theoretical planning and market realities highlight the need for dynamic system.		No change required to MSDF.	Suggestion noted.	
WCPDF	External	18.Technical departments continue to underspent on capital budgets		No change required to MSDF.	Noted but not something the policy documents like MSDF and DSDF can deal with.	