

Cape Town CBD Local Spatial Development Framework - 30 Day Public participation comments and responses (May 2025)

ITEM No.	Name & contact detail	COMMENT	Summary of issue raised	Official response
1	Alan Cameron	Company's Garden: Support any upgrade of children's play equipment and stage to support slow market activities. Request consideration is given for how to make park more attractive to adjacent residents, ie. encourage leaded dog walkers to frequent the park. Single women and vulnerable groups feel safer walking with a dog, even a small dog. The park would benefit from more regular utilisation and active citizens. Riebeeck Square: It makes perfect sense for a super-basement to be created to cater to the parking required by further development of buildings surrounding the square. Activating the ground level so it becomes a popular destination is logical and good sense.	Company gardens & Riebeeck Sq needs activation and upgrading (and underground parking)	Each square identified in the LSDF will be subject to its own detailed planning process, including determining the future parking provision required. Please refer to Implementation Plan: Upgrades for Company's Garden included as Project 121. Proposals forwarded to relevant line department.
2	Matthew Carter	I applaud your vision and foresight is pursuing this strategy. I am 100% in favour of a CBD devoid of personal cars. Only pedestrians and human powered vehicles should be allowed to enter this area. This will hopefully promote less litter and pollution in this space.	Support for the LSDF Document. Supports the reduction of car dominated spaces	Noted
3		If you do decide to allow vehicles into this space I believe they should be 0 emission vehicles with a congestion charge applicable on a sliding scale which penalises the worst polluters.	Promote zero emission vehicles with congestion charges	The forthcoming Travel Demand Management strategy will lay out a range of potential approaches to reducing private vehicle use for further consideration, including road pricing.
4		I also would encourage you to explore tunnel access into the city terminating in underground car parks. This will reduce the vehicle footprint within the city and force people to use alternative methods once they exit the vehicle. All underground infrastructure should be conducted on a construct to lease model with the entity tasked with the construction to "own" the annuity income from the project for a defined lease period over which they will maintain the infrastructure.	Explore tunnel access into city terminating in underground parking.	A next step for this MAP project is a detailed CBD Parking Plan, which will explore the parking needs, and potential options to meet those needs, in and adjacent to, the CBD. Agreed, that the vehicle footprint within the city should be reduced. The proposal to construct tunnels to access the CBD is still prohibitively expensive, even if it were technically possible (considering the underground services; heritage issues; ground conditions). These days, tunnels are built to support high-capacity forms of transport such as trains (e.g. Gautrain). The Implementation plan list the Parking plan as Project 030.
5	Katharine McKenzie	It's increasingly evident that the growing densities in the CBD are not sustainable in the absence of mass public transit (especially rail). There is a growing need to orient future CBD development to this reality including greater security for the rail network	Greater security on rail is essential to deal with increased densities (and what is expected to come)	Agreed
6		Incrementally remove street parking where possible to make the CBD more pedestrian friendly and enhance historic streetscapes (e.g. Parliament Street -- where parking clutters this narrow road which showcases different eras in heritage architecture and history)	Incrementally remove street parking	This is the broad approach as proposed in the MAP project. A next step for this project is a detailed CBD Parking Plan, which will explore the parking needs, and potential options to meet those needs, in the CBD. The Implementation plan list the Parking plan as Project 030.
7		Differentiate between pedestrians and cyclists. Their needs are different and should be well understood	Differentiate between pedestrians and cyclists.	Agreed. The recently-approved Walking and Cycling Strategy makes this clear, and all planning from now on (at a more detailed level) will be for these distinct modes rather than just "NMT".
8		Prioritise good pedestrian infrastructure for working Capetonians who depend on public transport to access the city. Their needs are not well met. A good example is the Plein and Strand intersection where there is daily conflict between commuters rushing to get to trains and MBTs vs speeding motorists. It is a very dangerous intersection and I have seen several pedestrian injuries here	Prioritise good pedestrian infrastructure for working Capetonians who depend on public transport to access the city, such as at Strand Street	Agreed. This is an area of particular concern. We are working with colleagues to improve the pedestrian design of that stretch of Strand Street as part of a broader upgrade of the adjacent public transport termini. Refer to Implementation Plan: Inner City Transport Hub (Project 002) which includes safe crossing of Strand Street.
9		Related is the quality of the public realm on Strand Street and surrounds. It's a mess! Of particular concern is the easy access onto the rail reserve along Strand Street which leaves the rail services vulnerable to (at best) fare evasion and at worst the full-scale arson which brought down the rail service in the pre-Covid era, and from which it has never recovered. While the state of this section of the city may be an 'urban management' problem, the way in which Strand Street between Adderley and the Castle 'shows up' is unattractive, unsafe, unwelcoming and unclean.	Strand St needs attention re urban management	Agreed. This is part of another study which is focused on upgrading the transport termini. Refer to Implementation Plan: Inner City Transport Hub (Project 002) includes safe crossing of Strand Street & improvements around the station deck and Adderley Street.

10		Identify lessons learnt from the failed cycle route installed on Adderley St ahead of the 2010 World Cup. In the absence of a network of dedicated cycle paths into the CBD, this has become 'dead' infrastructure	Lessons to be learned from failed cycle route in Adderley St	Agreed. That cycle lane is largely a casualty of constrained sidewalk space, which forces activity into the lane. Converting Adderley St into a transit street will address this. In addition to a more extensive network of class II cycle lanes, we hope that more generous sidewalk space alleviates the pressure on the cycle lanes.
11		With respect, while this process is important it suffers a little from the common South African syndrome that values 'process above outcome'. There is an urgent need for the CBD to function better and avoid encroaching gridlock . Policy blockages that prevent PRASA, CCT and SAPS from working together better to secure rail infrastructure and stations can mitigate against the desired impact of meticulous planning processes.	Focus on improved relationships between Prasa, CoCT and SAPS for secure rail infrastructure	Noted. We are very focused on the desired outcomes of this process, and are working towards concrete proposals for implementation. W.r.t. rail security, an MOU (outside the LSDF), is now in place between the City and Prasa to address institutional blockages and to work towards common outcomes.
12	Owen Davies	The core provision required to promote a pedestrian/cyclist de-motorized CBD is additional peripheral parking with access from bypasses to enable park-and-walk/ride into the CBD . The public transport into the CBD is insufficient and many people who become pedestrians have arrived with private vehicles.	Slow zones can only work if peripheral park-and-rides are enabled	Among the very next steps of the MAP project, is a detailed CBD Parking Plan, to assess the full parking needs of the CBD and approaches to satisfying them. The idea of peripheral parking near the bypasses is in place. Refere to Implemenation Plan: Parking Plan included as Project 030
13		Not adequately addressing where the vehicles will be accommodated when on-street parking is removed from certain areas . Parking for people coming from areas without adequate public transport is fundamental to pedestrianization until public transport is improved.	Vehicle parking solutions in case of on-street removals not clear	The parking plan will identify mechanisms to ensure that there is sufficient privately-provided parking to meet demand - off-street in parking garages, particularly on the periphery of the CBD. Refer to Implemenation Plan: Parking Plan included as Project 030 .
14		No, park-and-walk facilities deserve more attention.	Park and walk facilities not clear	This will be covered in the parking plan, with this CBDMAP supporting the "last mile" walk. Refer to Implemenation Plan: Parking Plan included as Project 030.
15	Thor Pederson	Ladies and gents. This is 154 pages obviously in the planning for a long time given the content thereof. You cannot expect the average Capetonian to read, understand and digest it, that is just plain unreasonable. There is no way our poor could read this and understand it, you are proposing fundamental changes to the manner in which our inner city and surrounds function and the impact on our lives and traffic will be massive. Its completely unreasonable to exect anyone to read 154 pages and comment on it. I strongly suggest this has proper public participation other than dumping it on your website for comment by the few that would be bothered to read it all..... i dont consider this proper public participation at all. Please can you find a proper mechanism for this to be distributed and understood in simple laymans terms for all Capetonians.	Document to complicated and proposals will bring massive traffic, need proper public participation.	The LSDF had two rounds of public participation, first 60 and later again 30 days. In each round more than 3 public meetings were held, in the first round 2 open houses in the central library. This is considered more than the required 30-60 days. Most projects listed in the Implementation Plan will still have its own participation processes to workshop the details of projects more specifically. The LSDF does not give or take away rights and contains guidelines only.
16		I do not agree to turning the city centre into a some sort of euro model cycling and walking ring at all, the congestion getting to and around the city will be insane.... where is the road traffic impact study ??? Please publish it so we know what we are in for as its unfair to ask us to make decisions on this without that.	Do not agree with CBD being european modelled cycling and walking area as congestion is considered to increase significantly. Road impact asesment required.	The Mobility and Access Plan is at a concept stage, to inform the LSDF and circulate ideas for initial comment. As it develops there will be further opportunities to comment. Individual project proposals will be subject to full design processes, which include impact assessments. Traffic impact assessments are for projects and not policy documents such as this LSDF.
17	Marianne Kapp	These proposals are great, but in terms of inclusivity and accessibility, would it be possible to allow for more wheelchair parking in the city , and possibly a map, or indications where these can be found? They're scarce and hard to find. And then, not everyone is able to walk at all, or far, so could this be taken into consideration to allow for older people or people with disabilities? Suggestions would include concessions for vehicles carrying people who are mobility challenged to allow them to access inner city parking, or wheelchair friendly parking right around the periphery. We need to allow for independent people who are mobility challenged, as well as those who are accompanied by carers, or even friends and family, to encourage social integration.	More wheelchair parking required and to be mapped. Road proposals to consider mobility challenged community.	Noted and agreed. The proposed pedestrian infrastructure would greatly increase accessibility by wheelchair on the majority of streets in the CBD, as well as making crossings safer and easier. Consideration must be given to disabled parking as well. As example, the Implemenation Plan refer to: Project 006 for Church Street Roundabout, dealing with universal access.
18		Couldn't the underground water sources be utilised more effectively for greening and beautification? As for the fortress aspect of the Castle. This is an important part of colonial and slave history, and shouldn't be tampered with too much, but more slave history could be incorporated? Yes, to the tourist bus parking, and also, please to parking for people with disabilities.	Consider using underground water sources more effectively for greening and beautification. Tree planting/ greening to be investigated.	Generally the discovery, optimisation and use of underground water cannot be done for this level of planning but have been rather successful in the design and development of particular precincts or smaller areas. Suggest this is an informant layer to be added to bring awareness to this possibility as individual projects are taken forward

19		Along the N1 (on the left-hand side) shortly after the M5 turn-off heading into town, there are large areas of land lying empty. Surely this could be utilised for additional low-cost housing since it is close to the City and the surrounding industrial areas, allowing for easy access to potential jobs and the amenities the City offers?	Culemborg should be developed for low cost housing	Culemborg is large site owned by Transnet and will be developed for back of port facilities in order to handle the significant increase in container traffic as well as agricultural product exports which CT harbour is known for. The Port Development Plan needs significant land for back of port facilities like inter-modal logistic hubs.
20		Well-done for proposals of inclusivity (not only for people with disabilities, but for different income groups etc.), and for continued urban planning to keep our City from slipping into decay as has happened in so many City Centres. Last thought - low-income housing must be maintained , as residents themselves do not always have the financial means to maintain such housing. Such maintenance should offer preferential employment to the residents.	Inclusivity of document is supported. LSDF initiative support for protection of the CBD from urban decay. Low income housing (shelters) should be maintained.	Noted support for LSDF process. The Council, who is responsible for the shelters of the homeless, will maintain those shelters.
21	Robert Moffat	The theoretical concept of a pedestrian only city must be seen in the local context, given the severe constraints on public transport and its possibility of expansion in the City of Cape Town - CBD and surrounding suburbs. It should also be acknowledges how bad an impact e-hailing services have had on the quality of traffic flow (poor and inconsiderate e-hailing driver practices leading to major congestion), in addition to the city's planning of large events in an incredibly cramped area.	Poor and inconsiderate e-hailing driver practices lead to major congestion.	Noted. These proposals are designed to support existing and future public transport access into and around the CBD. These infrastructure proposals will be accompanied by an operational plan for the CBD to address some of the current challenges identified here. Please note that the plan is not proposing a "pedestrian only" CBD, but rather a "pedestrian-friendly" environment
22		Mobility and access shortcoming will not be adressed by these proposals in the short term. If the freeways issue could not be resolved in decades, then what makes one think it will be resolved now?	Historical problems with incomplete freeways do not give much hope for resolution of mobility and access issues.	This plan is deliberately light on capital costs, as well as being incremental, making it far more realistic to implement. The Foreshore Precinct Feasibility project is under intensive study in a parallel process, which the CBDMAP is participating in.
23	Christian Ferreira	I think the proposed CBD decongestion zone and reduced parking spaces is a great idea in principle. But my concern is about the neighbourhoods surrounding or adjacent to the CBD, particularly the mainly residential ones like Bo Kaap, Oranjezicht and Tamboerskloof . The risk is that they become de facto parking lots for people no longer able to park in the CBD. There will have to be concurrent plans to control traffic and parking in these surrounding neighbourhoods to prevent what could be pretty awful traffic spillover effects if this is left unaddressed.	Support for MAP project. Concerns re surrounding neighbourhood which may become de facto parking areas dealing with spill overs.	This is a valid concern, and must be considered in the CBD Parking Plan that will be initiated as a result of this process. The Parking Policy (2020) creates the policy environment to address this. Refer to the Implementation Plan: Parking plan Project 030.
24		I live in Bo Kaap and I don't own a car because everything I need on a daily basis is within walking distance in and around the CBD. For things further afield I use MyCiti or Uber. So I spend a lot of time on foot in the CBD. Parts of it are already good, but there is always this sense that it could be so much more. I particularly look at the various public squares (almost all of them currently parking lots) and the lack of pedestrian and mobility friendly streets as a massive opportunity to take the CBD from pretty good to world class. So, for me these changes can't come fast enough.	Public squares (almost all of them currently parking lots) lack of pedestrian and mobility friendly streets	Noted, thank you. Public squares identified for public realm improvements and removal of surface parking over medium to long term, are listed. Refer to the Implemenation Plan: Projects on Riebeek Square and Harrington Square.
25		Nothing to mention apart from the very specific point about parking in surrounding neighbourhoods that I mention above. The CBD desperately needs this framework to be turned into actionable plans as soon as possible.	MAP project needs an implemenation plan and budget. Also concerns re surrounding neighbourhoods which may become de facto parking areas dealing with spill overs when slow zones progress.	Refer to the Implementation Plan: Parking plan Project 030. Noting the recommendation that the surrounding areas should be taken into account. This will need to be referred to the project lead department for their consideration of the brief formulation.
26		The redevelopment of Grand Parade is important and timely, with its potential as one of the main public squares of Cape Town. However, the plans are insufficiently ambitious on this square . The presence of vehicles in the square are an impediment to the aesthetics of the square, which is vital for Gen-Z travellers for whom 'the photo' of one of Africa's defining squares could be a major draw. Greater resources should be allocated towards rendering this square a centrepiece of the city , akin to how the public squares of Eastern Europe serve as meeting spots for tourists and drawing points for tourists. The plans should pedestrianise this area and include more ambitious efforts towards greenification	Grand Parade needs urgent attention.	Grand Parade Precinct is listed in the Implementation Plan: Project no. 77. As projects are prioritised for funding, individual project proposals will be subject to full design processes, and there will be further opportunities to comment. Proposals will be forwarded to correct line department: Strategic Assets

27		The plans rightly put heritage at its heart. However, it is regrettable that one of the global art deco movement's most important buildings, Africa's tallest skyscraper (when built), and a vital part of the history of global financial sector's history is omitted from the plans. The Old Mutual Building, to which I refer, is not only a visual delight but its a fine part of Cape Town's heritage. The Mutual Building should be included in System 3 (East City)'s 'Key Spatial Anchors' and Annex E's 'Tourist Sites and Routes'. This is the building that drew me to invest in Cape Town, and I know many others who feel the same. It is unseemly to have overlooked such an important structure in the planning for the future of this area when it has a proven track record of bringing millions of rand of overseas investment into the city. The Mutual Building provides a great opportunity to highlight the historical differentiation across the city. With a gold ceiling placed by Italian artisans, the longest stone frieze in the world, and the largest windows in Africa when it was built, the city should celebrate it as an asset and not let this mighty gem be simply omitted from such important plans. Church Square is an incredible architectural asset and should also be included in the key squares.	Support for heritage founded principles in the urban design concept. Old Mutual Building and Church Sq query to the sorted out.	5.1.3. System-based public structure page 29, is part of the design thinking and conceptual basis for reconceptualising the street system as a public realm system. The introduction notes that this chapter serves as a precursor to the Mobility and Access Plan (MAP) and associated implementation actions, (listed as Annexures) which concretise the ideas found in this chapter. This conceptual approach has been adopted to find a balance between mobility, access and proximity. It is structured into two primary systems that includes: North-South systems which connect and East -West connections. This chapter does not preclude the heritage significance and grading of buildings. Your comment of the sky-line is noted. The drafting team will review Figure 5-38: East City Precinct 11: Development guidance: Intensification and height indicators, and adjust to ensure landmark symbol is added.
28	Ben Jones	The plans for Grand Parade are a lost opportunity to make the most of neighbouring heritage buildings such as Mutual Heights, but also to imagine the square as an inspiring place for tourists and residents to enjoy. It currently would benefit from ambitious greenification as its far from any public green space, and the walk beside the Castle on square side could be made greener. This will also help reduce pollution latent from the nearby buses. Lots can be done with Grand Parade, and enhancing its character will make it easier for tourists to appreciate buildings whose potential is currently underappreciated such as the Old Mutual Building, once Africa's tallest (with possible exception of Great Pyramid of Giza) and which is the most famous structure globally of the art deco movement outside of the United States.	Grand Parade and Mutual Heights need more attention.	Grand Parade Precinct is listed in the Implementation Plan: Project no. 77. As projects are prioritised for funding, individual project proposals will be subject to full design processes, and there will be further opportunities to comment. Noted Darling should form part of the precinct thinking. This comment will also be referred to the asset owner(s).
29		Certainly, but they will benefit from greater focus on Grand Parade as if that area is not made cleaner and safer then tourists will not visit the adjoining areas and will have a bad impression upon arriving in the CBD.	Grand parade is important for the whole CBD as first arrival point	Grand Parade Precinct is listed in the Implementation Plan: Project no. 77. Grand Parade Precinct - This comments are mostly of operational concerns around cleanliness, safety and tourism and will also be referred to the asset owner(s).
30		They are a great start, but more work on pedestrianisation is required, in line with the world's leading cities, and greenification, given the enormous evidence of this on public health and wellbeing outcomes. There is some contradiction in the claimed prioritisation of heritage and the overlooking of one of the city's most important and impressive buildings, the Old Mutual Building. There also needs to be some focus on the quality of inner city businesses - businesses like pawn brokers in the CBD give the impression of a city in decline. The Grand Parade should be given a major focus.	Grand parade should be the prioritised investment. Quality of inner city businesses are NB and pawn brokers degrades the perception of the CBD.	Grand Parade Precinct is listed in the Implementation Plan: Project no. 77. Grand Parade Precinct - These comments are mostly of operational concerns around cleanliness, safety and tourism and will also be referred to the asset owner(s).
31		Darling Street should rightly be upgraded, but its unique and visually breathtaking historic value must be celebrated, not simply be lost as it gets marked as a transit street. Instead, Darling is a good candidate for pedestrianisation. Any efforts to render it more of a transit area should allow for the public to appreciate the unique architecture of the old post office, Mutual Heights and the other incredible buildings on Darling Street near the Adderley Street junction.	Darling street needs attention for pedestrianation	Noted with thanks. The "transit street" model is in large part to reassign much more space to pedestrians while still allowing important public transport routes. Interface with these important buildings will be important.
32		Please elevate ambitions for Grand Parade and Darling Street - these are invaluable assets of the city to be celebrated, not simply places of transit. Their architectural splendour should not be compromised, and these plans should look to enhance them rather than just write off Darling in particular as a transit street. It is a glorious architectural gem. for celebration. Thank you for your great work in producing these plans. They look promising, and with greater efforts towards unlocking the existing heritage potential of Darling Street and Grand Parade it could be truly excellent.	Grand Parade and Darling street need urgent work	Grand Parade Precinct is listed in the Implementation Plan Project no. 77). As projects are prioritised for funding, individual project proposals will be subject to full design processes, and there will be further opportunities to comment. Noted Darling should form part of the precinct thinking. This comment will also be referred to the asset owner(s).
33		Great piece of work and a pedestrianised environment is absolutely the correct vision for the CBD	Support the MAP Project and pedestrianisation	Noted with thanks.

34	Gabriel Miller	Please emphasis the need for urban greening , many more trees, seating areas, far wider pavements, upgrading of tarred pavements to pavers, quality street infrastructure and FORMALISED trading structures to assist vendors and improve the urban environment. There should be a concerted effort to beautify the CBD to instil civic pride in residents . The CBD has very few locations with manicured landscaping, flowers, lawns etc which are really the small features which take the appearance of a city centre to the next level. If a municipality like Stellenbosch can have beautiful flower beds and features there is no reason Cape Town CBD as the centre of the Western Cape economy cannot also.	Not enough focus on trees an urban greening. Formalise trading structures. Beautification should be scaled up. Plant more flowers.	Refer to Implemenation Plan where the Landscape Framework Plan for CBD is proposed under Project 005
35		The implementation framework is not specific enough and the suggested timelines are far too slow . These timelines should be broken down into more immediate time frames (e.g. 0-1 year, 1-2 years, 2-3 years, 3-4 etc) . There also needs to be firm budget commitments as currently the City budget seems to disproportionately unfairly allocate resources to the CBD relative to it's rates contribution.	Implementation actions are too slow	The Implemenation Plan will have to be taken forward as a Programme in which projects will be broken down into shorter priorities and timelines. The lifespan of LSDF is 5-10 years and priority projects or current initiatives are indicated as short term projects.
36		Strand Street station crossing, entrance and surrounds needs immediate attention as this area is chaotic, unsafe, untidy and unpleasant. The informal trading environment really needs to be looked at and formalised as this really makes the station area and surrounds reflect very poorly.	Strand street needs immediate attention, especially informal trading	Noted. Strand Street is identified in the plan as a priority link for pedestrian improvements and improved crossings. Strand Street improvements are part of Inner City Hub and Grand Parade interventions.
37		the Foreshore Freeway plan needs to be completed as soon as possible . A sustainable solution is needed here and this should include opening up the city to the sea with a promenade linking to the Waterfront. Pedestrianised spaces and far wider pavements as well as cycling lanes are needed within the CBD.	Complete Foreshore Freeway urgently	The Foreshore Feasibility project is ongoing and will be in public consultation process as soon as City leadership have considered outcomes of the feasibility process completed after 2 years of work.
38	Henk Egberink	Delighted that you are at last strategising for a pedestrian/cycling centric CBD . In favour of most of the suggestions, but there is no reference to trees . I suggest a variety of tall trees are planted every 6 m. along every street with a large open area for the roots (min. 0.5 m. diameter). Select species from current street trees that have adapted to city conditions and climate. Prefer non-indigenous	Support CB Cycling and pedestrianisation. But no reference to trees	This is noted. Please refer to the Landscape Framework Plan for CBD (to be drafted) as listed under Project 005.
39	Ruaan du Plessis	I just have a query wrt to your audit on the buildings/land use . Is there any possibility of including storage facilities for Informal Traders? Currently there is a lack of storage facilities for informal traders and they are expected to trek for quite some distance along the roads (in the road) with their structures and goods each day.	Question adequacy of storage facilities for informal traders.	Please note that the Review of the Trading plan is listed as Project 031. Proposals to be forwarded to the relevant line department working in the operational space.
40	Siena Hickey	While reviewing the commercial growth projections in section 5.8, I believe the reference to residential growth increase (p 111) should read "constructed between 2025 to 2035". This would reflect the table on the left of this section.	Improve Sec 5.8 on p 111	Noted with thanks.
41	Jan Dirix	I have no specific comments on the LSDF but want to express my full and strong support for this plan. Please put me under the positive comments. This has the potential to transform our city.	Support LSDF	Noted with thanks.
42	TRAP GUARD	We dearly support the entire plan We do need certain services to join in ...we currently are a registered security company and surely render our services...	Support LSDF	Noted with thanks.
43	Heather Moore	I'm writing to express my support for the draft Cape Town CBD Mobility & Access Plan , as part of the broader Local Spatial Development Framework (LSDF).	Support MAP project	Noted with thanks.
44		This plan is an important step toward a more just, accessible, and economically vibrant city. Prioritising walking, cycling, and public transport — while reducing unnecessary private car traffic — is critical for making the CBD safer, fairer, and more connected for everyone. As someone who has lived and worked in the CBD since 1996, walking to and from work daily, I believe this plan will benefit: • Small businesses (like mine) that depend on foot traffic • People who rely on affordable public transport (minibus taxis, rail, MyCiTi, Golden Arrow) • Safer and more inclusive access for people walking, cycling, or commuting without cars	Support MAP project	Noted with thanks.

45		I also want to share the following ideas or concerns that I think should be considered as the plan moves forward: • Cars cannot be allowed to use the sidewalk as a parking zone. This is tolerated all over the city, and is a disaster for pedestrian traffic. • Cars and Taxis that do the 'half-stop' to drop off passengers cause constant frustration and congestion, and need to be discouraged	Concerns with parking on sidewalks and drop off spots for passengers	Agreed. The Mobility and Access plan will proceed with more detailed operational and management planning for the CBD, which includes questions of moving and parking enforcement. Parking Plan to address loading and parking in the CBD.
46		I urge the City to adopt and implement the Mobility & Access Plan with strong community engagement, clear public timelines, and a commitment to real change on the ground.	Supports the MAP and urge for adoption	Thank you for your support for the CBD MAP Noting strong community engagement
47	Francois Dufour	I just wish to appeal that the elevated highway from the ICC to the Helen Suzman boulevard be completed as a gift to all motorists in CT.	Complete the elevated freeway	The Foreshore Freeway Precinct is under intensive study in a parallel process, which the CBDMAP is participating in. Feasibility to be concluded over the short term.
48	Matthew Knoetze	I reside in the Mutual Heights Building (14 Darling Street) and I own a parking bay in the Adderley on Adderley st. To get to the entrance of the Adderley parking garage, anyone has to go down Parliament street. I use my vehicle for work so catching public transport is not an option for me. I very much hope any limitations placed on traffic is directed towards non residents only as I already pay very high rates and taxes and levies for the right to stay in this expensive city centre.	Limitations on parking should not be placed on permanent residents	Noted. The CBD Mobility and Access Plan has been developed with careful consideration to questions of local access to buildings. It does not propose to stop residents from accessing their own buildings or parking's, even where access is restricted to other vehicles.
49		Furthermore, I am out the country some parts of the year and during this time I let my flat out on air bnb. The parking bay is also included in my bnb rental and is very much valued to my guests. I also want to make sure these plans take into account the many bnbs and their value they bring to tourism . I expect this will not be affected.	Airbnb users should not be limited when parking policy gets reviewed	The plan accepts that residential parking bays are required by high income residents, and that the market provides for them. Proposals will be forwarded to the relevant line department.
50		I cannot say they do as the documents are so complicated so I would have to say my answer is no because of the complexity. I refuse to take a bus in my own city . That's why I drive a hilux .	Document too complex. Use private car in CBD because bus in not working.	The plan does not force private car users out, but recognises the burden that they place on non-car users
51		Project 6...no they are not if it means I cannot take my own vehicle home	Concerns about existing parking rights possibly being reduced	Project 006 refers to Church Street Roundabout
52		Again, why so complicated? It seems like you are trying to stop me driving my own vehicle to my home. If that is so I do not at all support this!	Insistence to continued use of private car	The plan does not force private car users out, but recognises the burden that they place on non-car users
53		If I cannot use my own vehicle to drive home or to work every day then no I do not agree or support	Insistence to continued use of private car	The plan does not force private car users out, but recognises the burden that they place on non-car users
54		Please make this simpler. Who can u see stand this? Maybe a civil engineer wrote this plan?	Document too complex.	Noted
55	Gareth Ramsay	I whole heartedly agree with the intention of the framework, but it will not be able to be practically implemented without a complete re-think of the public transport into and out of the city as this plan will only work if fewer people choose to use or need to use their own private vehicles to get into and out of town, especially towards the atlantic sea board. Please contact me if you would like more ideas in this regard.	Support LSDF but will not work unless public transport fundamentally change and becomes dominant mode.	Noted with thanks. The CBD Mobility and Access Plan is designed to support and enable public transport access to the CBD. The Atlantic Seaboard currently has strong public transport links to the CBD in the form of frequent, reliable MyCiTi service. In fact, it is the part of the city best-served by public transport. However improvements are always possible and necessary. Apologies, commenters cannot be contacted individually.
56		While I completely agree with making the city more walkable, for this framework to work, we need to address how people gain access to the city as there is not good enough public transport getting people into and out of the city which will be desperately needed if you want to reduce congestion in the city and make it more walkable. If you implement this framework, without addressing how people get into and of the city which is mainly with the use of cars, all you will do is increase congestion within the city.	Insufficient access and exit of the city with public transport, unless improved LSDF will not work.	Agreed. Currently the majority of people access the CBD by some combination of public transport and walking; an additional group drives into the CBD and then proceeds on foot. The CBD Mobility and Access Plan is designed to support and encourage these dynamics, but improved public transport is always necessary. The major gains made by Prasa in returning the rail service, using quality trains, supports and is supported by this plan. The City's rail study shows its commitment to improving the services further.
57	Luke van Wyk	This is a great document and I am in full support of it. There should be a guide on implementation plan, timeline and funding for this plan so that there is accountability for a timely implementation	Support the LSDF but Implementation Plan should be monitored and funding made available	Implementation Plan provides indication of high level timeframes and lead departments.

58	Josh Lindenberg	The City of Cape Town's spatial development plan seeks to create a more pedestrian-friendly and sustainable urban environment. While this vision aligns with global best practices, there are growing concerns about the unintended consequences of excessive open spaces, lack of enforcement, diminishing vehicle access, and the removal of critical parking infrastructure in key commercial zones. The current trend of converting streets into pedestrian zones echoes elements of the Barcelona Superblock model, which prioritizes walkability and community engagement. However, an overcorrection in this approach risks stifling economic activity in the Central Business District (CBD). While reducing car dependency is a noble goal, a functional city requires a balanced mix of mobility options to maintain accessibility for businesses, emergency services, and commuters.	Support pedestrianisation but concerns about unintended consequences of excessive open space, lack of enforcement, lower vehicle access, removal of critical parking in commercial zone. Risk of shifting economic activity, need balanced approach to parking as businesses are car dependent.	Noted with agreement. The CBD Mobility and Access Plan is designed to take a balanced approach, by distributing the public right of way so as to maximise the functionality of the street network for all users. It has taken a balanced approach: you will note that no new pedestrian malls are proposed.
59		Furthermore, the abundance of open spaces —intended as communal assets—has inadvertently led to challenges related to vagrancy and informal occupation. Stronger enforcement mechanisms, inclusive spatial planning, and public-private collaborations are necessary to ensure these areas remain welcoming, productive, and beneficial to the wider population. Without adequate oversight and urban management interventions, these spaces can become unsafe and underutilized, counteracting their intended purpose.	Open spaces, not adequately policed, lead to vagrancy and informal occupation which degrade the areas.	Implementation Plan include proposals related to urban management, upgrade and activation within the public realm.
60		Another critical concern is the removal of too much parking. While promoting alternative transport is essential, parking remains a key component of urban accessibility—especially for workers, customers, and visitors who rely on vehicular transport. An overly restrictive approach to parking reductions could deter businesses, limit consumer convenience, and hinder economic vibrancy in the CBD.	Parking should not be removed as it drives the business vibrancy in the CBD	An immediate next step for the CBD Mobility and Access Plan is the development of a CBD Parking Plan. Refer to the Implementation plan: Parking Plan as Project 030. This study will consider the full parking needs of the CBD and approaches to meeting them. Initial indications are that off-street parking is significantly under-utilised, but is available throughout the CBD.
61		A more balanced urban mobility plan should ensure that key parking infrastructure remains available while incentivizing public transport use , cycling, and pedestrian access. An optimal approach would strike a balance between pedestrian-friendly infrastructure, necessary vehicular access, and sustainable spatial planning, ensuring the CBD remains a thriving economic hub while fostering a livable city. Urban regeneration strategies should integrate thoughtful zoning, active space management, and community-driven security initiatives to prevent unintended deterioration. With proper enforcement, infrastructure improvements, and a measured transition towards pedestrianization, Cape Town can realize a vision that enhances both mobility and public spaces without compromising its economic vitality.	Key parking areas should remain, incentives for public transport, cycling and walking. Active space management and community-driven security initiatives required.	Proposals will be forwarded for incorporation into the action plans of the urban management department/ urban renewal who deals with SRA/CIDs and immediate areas located outside the CID Boundaries.
62		Mostly, however, there is too much emphasis on walking streets. These need to be catered to needs. It cannot be every second street. Vehicle access is pivotal to a thriving CBD. This will merely lead to people exiting the CBD and heading towards malls, ultimately resulting in a CBD that is no longer attractive to the public or businesses.	Too much emphasis on walking streets. Vehicle access is essential.	The CBD Mobility and Access Plan proposes no additional fully pedestrianised streets. Local vehicular access is preserved on all streets.
63		Mobility needs to first be fixed. Significant work on general road and traffic enforcement in these serious is seriously lacking. By adding more loading areas and open spaces requires more enforcement which is already below average.	General road and traffic enforcements is seriously lacking and need to be fixed first.	A plan for operations and management of CBD mobility is a key next step. The parking policy (2020) lays the foundation for stronger enforcement mechanisms. The comment will be directed to the correct department.
64		The plan is overly pedestrianised.	Too much emphasis on walking streets.	Noted. That is because it is serious about upgrading the CBD. The best CBDs internationally cater for more walkable, liveable environments
65		I'm writing to express my support for the draft Cape Town CBD Mobility & Access Plan, as part of the broader Local Spatial Development Framework (LSDF).	Support the MAP project	Noted with thanks.

66	Emma Louw	This plan is an important step toward a more just, accessible, and economically vibrant city. Prioritising walking, cycling, and public transport — while reducing unnecessary private car traffic — is critical for making the CBD safer, fairer, and more connected for everyone. As someone who lives in the CBD, I believe this plan will benefit: -Small businesses that depend on foot traffic -People who rely on affordable public transport (minibus taxis, rail, MyCiTi, Golden Arrow) -Safer and more inclusive access for people walking, cycling, or commuting without cars	Plan will benefit businesses	Noted with thanks.
67		I urge the City to adopt and implement the Mobility & Access Plan with strong community engagement, clear public timelines, and a commitment to real change on the ground.	Implement the MAP with stron community engagement, public timelines, and commitment to real change	Noting the view of commitment to action
68		The strategy appears to lack a foundational assessment of current conditions . There is very little quantitative data presented on population densities in space (what is there is in table format), key movement patterns into and within the CBD, or the spatial distribution of trip-generating locations.	Strategy lack foundational assessment of current conditions. Noting that Vol 1 of the LSDF will be made available once the final copy of Vol 2 goes for approval and that the MAP project has it's own extensive documents.	This Annexure is limited to the high-level proposals of the CBD Mobility and Access Plan as well as the Spatial Framework inclusive of the heritage components. The Volume 1 of the SDF was already made public in 2022-24 and contains background information re population densities and key movement. The comprehensive MAP Report, is in an advanced stage - more so than what was included in the April 2025 public version of the LSDF attachment. It documents the extensive quantitative and qualitative evidence-gathering that informs the plan. This includes assessment of land uses, existing transport demand patterns, a large number of existing Transport Impact Assessments in the area, and extensive photo documentation produced over the course of approximate 40 hours of direct observation of the CBD, by various groups of people, at different times of day and week. It is also in line with the change in planning approach found in the CITP from a "predict and provide" approach based on numbers, to a "decide and provide" approach based on a vision of a different future.
69		Furthermore, critical success factors—such as addressing crime to ensure pedestrian safety, ensuring reliable and flexible public transport, and accounting for Cape Town’s variable weather conditions—are notably absent . The document includes several abstract maps with arrows and symbolic annotations, but their meaning and practical implications on the ground are unclear .	Dealing with impact of cirme, reliable & flexible public transport and weather conditions, are missing from the MAP Reports. Maps are too abstract ad meaning is not clear.	The MAP annexure to the LSDF is not the full MAP Report, The full document will similarly engage more extensively with the full range of needs, beyond the infrastructure proposals.
70		Similarly, while the inclusion of idealised urban street typologies is noted, there is no alignment with the actual geographic dimensions or existing conditions of the CBD streets they are intended for . The absence of real street-level photographs —many of which are readily available via platforms like Google Street View— raises questions about how grounded these proposals are in local reality . Planning for ground-level interventions without showing the spatial and physical context significantly undermines the feasibility and relevance of these ideas .	Conceptual urban street typologies are ok but the alignment with geographic dimensions of streets in CBD lacking. Absence of real street photos undermines relevance of ideas.	The MAP annexure to the LSDF is not the full MAP Report, The full document will similarly engage more extensively with the full range of needs, beyond the infrastructure proposals.
71		There is broad support for the vision of a more inclusive, walkable, and vibrant CBD. However, such transformation must be grounded in data, adapted to local conditions, and sequenced pragmatically . Economic densification and improved safety must precede large-scale pedestrianisation . Without a robust evidence base and realistic implementation framework, the plan risks being perceived as a theoretical exercise disconnected from the lived reality of most Cape Town residents.	Support MAP project, but vision of walkability needs to be grounded in data, local conditions and sequencing of pragmatic project implemenation. Densification should precede pedstrianisation. Lack evidence base and could be to theoretical.	A guiding question for the CBD Mobility and Access Plan was: what transport system is required to support the existing and anticipated development and densification of the CBD? The LSDF document details the anticipated densification of the area, through both quantitative modelling and existing development rights. A process of scenario planning revealed that there is no acceptable future for the CBD that does not involve significantly greater support for walking, cycling, and public transport. This Plan is developed as a response to those findings.

72	sibusiso dlamini	Precinct based guidelines are not implementable for several reasons , namely: 1. No indication of any costing and implementation timelines 2. There is no acknowledgment of the critical success factors that need to be considered for adequate implementation 3. No consideration of any pre-conditions that need to be met in order for success to happen.	Precint guidelines are not implemenatable due to lack of costing and timelines, no success factors listed, no preconditions listed.	A LSDF is a document which tries to consolidate the vision and objectives of a group of stakeholders. The LSDF's design guidelines get used during the early design phases of projects planned for implementation both on government or private land parcels. The Implementation Plan puts together the known projects available from various line departments and their committed timelines (which implies budget - especially over the short term). Generally the Implemenation Plan needs to be translated into a Programme Plan under a Programme Manager which will be responsible for the formulation of many of the project implemenation schedules for the various projects (in association with the line departments), who wil remain responsible for budgeting, project design and detailed project schedules and implementation.
73		Disconnection from Local Context and Overreliance on Global Urban Ideals. The strategy appears to be heavily informed by Western planning paradigms and academic literature , with insufficient consideration of Cape Town's specific socio-economic and urban challenges . Attempting to replicate European urban design models without addressing key local factors—such as fragmented transport access, safety concerns, market dynamics, and the lack of high-density mixed-use development—risks producing aspirational but unimplementable outcomes.	Document is too European and not applicable to an African City's socio-economic and urban challenges (framented transport access, safety concerns, market dynamics, lack of high density mixed use development).	The plan looked at examples of good CBD planning from various parts of the world, but is fundamentally grounded in intensive data-gathering and study of Cape Town including the factors identified.
74		The mobility vision , for example, lacks a sober assessment of the risks associated with the rail network—both in terms of reliability and future investment . Given that rail infrastructure has not kept pace with population growth and that no substantial new capacity has been added , relying on public transport as the default access mode to the CBD may be premature.	Moblity vision lacks risk acknowledgement associated with rail network reliability and investment limitations. Inadequate investment in rail is problematic.	A majority of CBD users presently arrive by public transport or active mobility; a further group arrive by car and then continue on foot. While the recent dramatic revival of rail is promising (60% increase in ridership from 2022 to 2024), risks to rail formed part of the scenario planning process. The City's transport demand modelling suggests that in the absence of rail, public transport demand into the CBD will continue to be served by other public transport modes.
75		Restricting car access into the CBD without providing a safe, flexible, and efficient alternative risks excluding a majority of residents from economic and social participation in the city centre. This exclusion could have unintended negative consequences for businesses and urban vitality.	Restricting vehicles could have economic consequences.	No restriction of vehicular access to the CBD is proposed; only a reconfiguration of the local access system.
76		Unrealistic Assumptions About Everyday Mobility and Access The plan's assumptions about how people will move around are overly idealistic . For example, a commuter travelling from Observatory to the Icon Building would face substantial time and logistical burdens if required to avoid private car use.	MAP project make unrealistic assumptions and is overly idealistic.	Please see above. The plan also allows for greater choice: including public transport or cycling for the example given
77		Cycling is impractical for many due to safety , infrastructure, attire, and weather. The train is infrequent and unreliable, and MyCiTi access requires preloading cards and navigating multiple modes. What could be a 15-minute trip by car becomes a 45–60-minute ordeal, highlighting the inefficiencies and lack of flexibility in the proposed mobility framework.	Cycling is impractical in the CBD, due to topography and wheater. Train unreliable and MyCiTi not intermodal. Not even the CBD is a 15 min city.	Public transport and cycling both require ongoing improvement. The recent dramatic improvements to the rail service accessing the CBD are to be considered - it is now reliable, safe and comfortable (climate-controlled), with peak time headways being progressively reduced.
78		This top-down, one-size-fits-all approach does not appear to reflect the realities of daily life for most of Cape Town's five million residents. The envisioned improvements to public space in the CBD may benefit a small segment of users, but the broader impact—especially on those living outside the CBD—may be negative due to increased travel costs, time, and inconvenience.	Cape Town realities not visible in the LSDF and MAP doc. Investments in public spaces only benefit a small segement of the market.	The CBD Mobility and Access Plan is designed to serve the majority of daily CBD users who currently rely on public transport and active mobility; as well as future growth of the CBD which cannot be accommodated with more road infrastructure.
79		Misunderstanding the Constraints of the Existing Built Environment Statements in the plan such as “encouraging basement and structured parking” fail to consider the physical and economic realities of the existing built form .	Structured parking is against physical and economic realities	There area basement parking areas in the foreshore already which works perfectly fine. An immediate next step for the CBD Mobility and Access Plan is the development of a CBD Parking Plan, which will study the full parking needs of the CBD and approaches to meeting them.

80		Infill developments or heritage buildings cannot feasibly retrofit underground parking. Such interventions are only viable for large-scale redevelopments or greenfield sites. Without realistic strategies for accommodating car access, retail and hospitality businesses may suffer due to reduced customer accessibility. Restaurants, for example, rely on patrons who drive in from suburbs, park nearby, and feel safe returning to their vehicles late at night. Expecting them to substitute this with an R100–R150 Uber trip or a risky public transport option is impractical and will likely reduce footfall in the CBD.	Infill developments or heritage buildings cannot feasibly retrofit underground parking. Without parking businesses will die.	Please see above comment.
81		Disconnect from Ground-Level Reality and Public Safety It is not clear that those drafting the strategy have meaningfully engaged with the on-the-ground experience of the CBD—particularly after hours. Walking down St George's Mall at 19:00 illustrates the problem: it is dark, largely empty, and feels unsafe. Without a critical mass of residents or active precinct management , the envisioned "vibrant streetscapes" will not materialise. Moreover, local environmental conditions—such as Cape Town's notorious wind—also deter walking and cycling. These factors contribute to a cultural and practical preference for private vehicle use, which should be acknowledged rather than ignored or discouraged without viable alternatives.	Proposals and strategy lacks on-the-ground-experiences especially after hours. St Georges Mall is UNSAFE. Needs more residential and active precinct management.	Please see above comment regarding data gathering and evidence base. Refer to the Implementation Plan: St George's Mall is addressed under Project No. 025. Information will be forwarded to relevant line department.
82	Gerard van Weele (Climate Change Directorate Department of Environmental Affairs and Development Planning Western Cape Government)	5.1.1 What about general urban greening and street trees - where can intervention make the biggest difference, outside of parks and squares?	Need more trees and greening	Please refer to the Implementation Plan Project 005; Landscape Framework Plan.
83		System 1: West City (5) Better interface with the Riebeeck square open space	Better interface required with Riebeeck Sq and open space	Refer to the Implementation Plan: where a specific project is listed looking at Riebeeck Square (Project 063). Proposals will be forwarded to the relevant line department.
84		System 2 : system functionalities - Potentially a critical component of a circular public transport and NMT route around the CBD	??	IPTN network efficiency addressed in Project 029
85		System 2: Project formulations (4) - Which is upper and which is lower?	What is upper and lower?	Upper refers to the higher section topographically. This can be clarified in the text.
86		System 5: project formulations The space around the Good Hope Centre needs 'people-scale' attention - it is a wind-swept desolate place at the moment, yet flanked by two landmarks and a school.	Good Hope Centre needs a project on 'human scale'	Referring to '5.1.3. System-based public structure' - This chapter serves as a precursor to the Mobility and Access Plan (MAP) and associated implementation actions. Good Hope Centre is mentioned in the Implementation Plan under Project no. 79. As projects are prioritised for funding, Individual project proposals will be subject to full design processes, and there will be further opportunities to comment.
87		System 5: project formulations (4) Also functions as an important cycle route into the city hall precinct and Wale st area.	Sytems 5 has cycle route	Referring to '5.1.3. System-based public structure'- This chapter serves as a precursor to the Mobility and Access Plan (MAP) and associated implementation actions. Noted, System 5 'Project formulation 4' refers to prioritisation of public transport. Refer to Implementation Plan: Refer Projects no. 77 & Project item 26 (CBD MAP - transit streets) & 113 (CBD MAP - Super Block East, Transit streets).
88		5.2 Might be necessary to define "non-essential" vs "essential". Someone driving to the office might consider their trip "essential".	Define essential and non-essential trips as not similar for different office workers.	Chapter 5.2 : 'non- essential trips' to be defined more clearly in the document.
89		5.2.1 This would also replace the truly frightening pedestrian crossing at the end of Cauvin	Cauvin St	
90		5.2.5 Unlikely to be a preferred route for northbound cyclists - too many stops/too narrow to be safe at the inevitable higher speeds coming down the hill. Buitenkant is the natural route.	Cauvin St unlikely to be a preferred route for northbound cyclists	Noted, Page 43,5,2,5 state ... Investigate Harrington-Maynard-Upper Maynard Street alignment for north/south bicycle facilities linking in with the Gardens area. Refer to the Implementation Plan project: East City Slow Zone addressed under Project No. 115
91		Table 5-2 Wale Street also has potential. It doesn't carry a substantial amount of traffic, and links several landmarks.	Wale St has potential	Referring to '5.1.3. System-based public structure' - This chapter serves as a precursor to the Mobility and Access Plan (MAP) and associated implementation actions. This point is acknowledged and Wale street will have to be considered in relation to Adderley as a transit street. Refer to Implementation Plan: Project Darling and Adderley Transit Street no. 026
92		5.5.5 Important to invest in new green infrastructure (vegetated surfaces) to redress poor designs and buffer future heat issues	Need greenery and trees	Refer to point 5.5.5.10 (page 73). Refer to Implementation Plan: Landscape Framework Plan to address greening of the CBD (Project 005). Proposals to be forwarded to the relevant line department.

93		5.5.5 Vegetated surfaces have a stronger temperature mitigation effect than shade trees. Trees only provide local relief in the shade, whereas vegetated surfaces ameliorate the overall temperature	Vegetated spaces to be improved	Refer to point 5.5.5.10 (page 73). Vegetated surfaces could be clarified added here, noting operations and maintenance will also guide line departments and asset owners for City-led projects and initiatives. Also refer to Implementation Plan: Landscape Framework plan, where appropriate locations and extents could be considered within that project. Project no. 005
94		5.6.2 Improve the pedestrian and cycling route guidance and connection onto the pedestrian bridge and into Dock Rd	Connection into Dock Rd for pedestirans and cycling	The Foreshore project will have to consider this proposal. Also note the Implementation Plan: Waterfront Walk (Project 059)
95		I'm writing to express my support for the draft Cape Town CBD Mobility & Access Plan, as part of the broader Local Spatial Development Framework (LSDF).	Support LSDF	Noted with thanks.
96	Clara Machado	This plan is an important step toward a more just, accessible, and economically vibrant city. Prioritising walking, cycling, and public transport — while reducing unnecessary private car traffic — is critical for making the CBD safer, fairer, and more connected for everyone. As someone who uses the CBD, I believe this plan will benefit: • Small businesses that depend on foot traffic • People who rely on affordable public transport (minibus taxis, rail, MyCiTi, Golden Arrow) • Safer and more inclusive access for people walking, cycling, or commuting without cars	Support prioritised walking cycling and public transport	Noted with thanks
97		I also want to share the following ideas or concerns that I think should be considered as the plan moves forward: better cycling protection on Bree street - better enforcement and prevention of parked cars in the cycle lanes. I urge the City to adopt and implement the Mobility & Access Plan with strong community engagement, clear public timelines, and a commitment to real change on the ground.	Bree street proposals include better cycle protection, better enforcement	Noted and proposals will be forwarded to the line department involved in detailed cycling projects. The MAP project will be going into it's own public consultation process and both plans will have implementation plans which are monitored.
98		Cape Town would make a huge worldwide statement if it electrified MyCiTi route 107 from the Waterfront via Adderley Street to the lower cable station, banning cars from cluttering up the road leading to Table Mountain. What a stunning victory for environmental protection!	Electrify MyCiTi	Thank you for your comments. Electrification of MyCiTi operations is an area of ongoing investigation. Suggestions will be forwarded to relevant line department.
99		. According to Cape Talk of 25 November 2022, GABS has discovered that "an electric bus costs about three times as much as an internal combustion engine but the saving over time recoups that". I know that they are talking about battery buses here (I am well aware of their antipathy towards overhead wires) but if GABS is serious about battery buses they will in any event have to clean up their messy route pattern as well as their unbalanced schedules, far in advance. How else will Cape Town plan for the optimal positioning of charging stations, substation capacity, slow or fast charging, depot or on-route charging etc. (Some under-used railway substations may come in useful).	Charging stations for EVs	Golden Arrow Bus Services is currently not under contract to, or regulated by, the City of Cape Town. Over time, the MyCiTi service has replaced a number of GABS bus routes and brought them into the Integrated Public Transport Network. Planning for the future electrification of public and private vehicles is being undertaken by the City.
100		Is the Western Cape government financing this battery idea? I find it strange that a provincial government, even a DA-run one would suddenly take an interest in electric buses. Knowing the historic dislike of electric trolleybuses in Cape Town, I find the sudden enthusiasm for battery buses somewhat optimistic in the circumstances. What about MyCiTi's own unsatisfactory experience with battery buses? Familiarise yourselves with successful international experience with trolleybuses making use of in-motion charging, and don't forget about rare-earth battery problems down the line.	Critique against electric trolley buses	This discussion is beyond the scope of this study.

101	Vaughan Mostert	I assume that "envisaged quality bus services" refers to a standard roughly equal to those of MyCiTi. If so, we have a bizarre situation in Cape Town. On any yardstick of comparison – quality of service, frequency of service, hours of operation, number of trips per day, fare collection system, fare levels, days of operation, information such as maps and timetables, the contrast between the two operations could not be more glaring. There can be few, if any other cities in the world where there is such an astonishing difference between two formal, subsidised bus services - MyCiTi operating in one part of the city and GABS operating in the other. (Take comfort from the fact that Gauteng cities come close). Yet both services fall under the ultimate control of the same political party! According to the master plan, GABS is under contract to the Western Cape government. Your first priority should be to bridge the current inexplicable gulf between MyCiTi and GABS.	Bus operating companies should be managed under one umbrella.	This is outside of the scope of this study, but yes, the City has been advocating for the transfer of the control of GABS, on favourable terms.
102		Stop your obsession with taking over rail services - that can wait. So can attempts to fix the minibus-taxi situation, even acknowledging the ongoing mayhem which reflects badly on a city that claims to be well-run. (Rather prepare yourselves for the violence that will break out once MyCiTi and GABS get their respective acts together and start seriously cutting into taxi usage as well as car usage. You want to reduce car usage, don't you?	Drop the initiative to take over rail services in favour of fixing the taxi industry	The future modal share within public transport is the subject of another plan: the IPTN: integrated public transport network plan. It is expected that increased capacity in any one mode will simply pick up the growth in demand.
103		GABS has been operating public transport in Cape Town since 1861. By now one would expect it to have at least a website that bears some similarity to that of MyCiTi. Unlike the MyCiTi site, which actually gives too much information, the GABS site is of no use. It requires would-be users to know first where they are and second where they want to go. They are then confronted with no less than 1 829 possible combinations of origin and destination to choose from. Many of these timetables are duplications and none of them give any indication of the actual routes followed. Most of the 200? 300? 400? GABS routes have less than ten trips a day. Having found a timetable, the would-be traveller will discover that the majority of routes operate only in the morning and afternoon peaks, with considerably reduced weekend services, if any. This is much like the provincial contract services in Gauteng, which are also laced with trips that simply disappear, where at least some of the buses should be rerouted to do more productive work through areas of high car ownership on the way to their destinations. When trips disappear like this it suggests a lot of dead kilometres. While some dead kilometres are unavoidable on weekdays when peak periods apply, it happens on weekends as well, which is unforgivable.	Quality of the GABS website is very low	This falls outside the scope of this study, and the control of the City. Please direct your request directly to GABS?
104		To make it more specific, I would repeat my offer to the mayor of Cape Town years ago to be given access to the GABS Sunday drivers rosters so that we can start cleaning things up. On Sundays, GABS operates 572 bus trips in one direction and 543 in the opposite direction on its 69 active routes. That alone should indicate a problem – there is a lot of dead km going on! Another conclusion is that 572 trips on 69 routes amounts to an average of eight buses on each route. Compared with 800 MyCiTi Sunday trips on 39 routes, a better service of 20 round trips per route. (That was before MyCiTi started cutting routes and frequencies around 2024).	Offer help with bus scheduling and optimisation	As in the line above
105	Richard Harris	The mobility issue for the east city is flawed. The concept of the east city being a transition is gone but the suggestions to remove cars from the area via shared streets and trusting the parking lot into a public area is flawed	East City cannot have removed cars and parking and delivery. The area will die.	The East City Slow Zone is designed as a response to ongoing and anticipated densification in the area, including the restitution development of District Six. This development requires significantly improved walking, cycling, and public transport; it is also potentially very economically beneficial for the area. The East City Slow Zone will not be implemented before the conditions that require it are in place, which are also the conditions that would diminish the relative importance of private vehicles to the local economy. Refer to the Implementation Plan project: East City Slow Zone addressed under Project No. 115
106		East city guidelines overall are good except for the mobility draft	Development Guidelines supported	Noted

107		The shared street concept on east city precinct is flawed and needs more investigation. The businesses need on street parking and Harrington parking lot. The removal of these will mess the economy and will create dead zones. There is insufficient volume of public and people living in the area to justify the shared street concept.	East City slow zone needs further detailed consultation as it is flawed in current form.	The East City Slow Zone is designed as a response to ongoing and anticipated densification in the area, including the restitution development of District Six. This development requires significantly improved walking, cycling, and public transport; it is also potentially very economically beneficial for the area. The East City Slow Zone will not be implemented before the conditions that require it are in place, which are also the conditions that would diminish the relative importance of private vehicles to the local economy. East City Slow Zone Concept to be designed/developed and consulted at time of implementation. (Project 115)
108		The City should prioritise development models that create opportunities for well-located and affordable housing. These mechanisms suggested through commenting should allow for the delivery of much needed affordable housing. Given the profound housing crisis and the limited availability of centrally located land, the LSDF must be explicit in its commitment to delivering the maximum possible number of genuinely affordable housing units. To achieve this, the City must adopt clear, transparent, and enforceable affordability criteria that reflect the lived realities and incomes of working-class and low-income residents.	Affordable housing should be mandatory	The Affordable Housing policy is under development and will first have to be completed with clear guidance to the CBD and other CBDs. In the CT CBD the principles for AFH has been laid down as part of the public good. The CBD Overlay Zone Review process (with a separate public participation process), will commence soon and complete in 2026/27. This will give statutory guidance of AFH in the CBD. The suggestions will be forwarded to the Human Settlements Policy Department. Project 001 related to rationalisation of the CBD overlay zones which will include provision for inclusionary/affordable housing.
109		We commend the City's recognition of the importance of spatial transformation and the need to redress the enduring legacy of apartheid spatial planning. However, we submit that the Draft LSDF, in its current form, fails to deliver on the constitutional and statutory imperatives of equitable development, spatial justice, and inclusive access to the CBD.	View that the LSDF is not delivery statutory imperatives of equitable development.	Unfortunately we cannot agree with this point. The LSDF cannot include instructions in the absence of an Affordable Housing Policy depicting principles and preferred locations. This LSDF is in particular detail clear about all government land parcels and the reflection of the development intention on those, which include residential primarily. The Overlay Zone Review Process also supports the establishment of an improved regulatory environment aimed at including affordable housing in a range of typologies. Refer to the Human Settlement Theme in the Implementation Plan where various projects such as Leeuloop, Founders Garden, Roggebaai, Government Garages, Fruit & Veg site and various City owned land parcels are indicated to address the critical affordable housing demand in the CBD.
110		The LSDF falls short of articulating a concrete and actionable vision for the delivery of deeply affordable housing within the CBD. While it gestures toward mixed-use development and a more diverse residential profile, there are no binding commitments to inclusionary housing , nor are there mechanisms to ensure that public land is prioritised for low-income residents.	LSDF is not concrete enough about affordable housing	The LSDF cannot include instructions and targets in the absence of an Affordable Housing Policy depicting principles and preferred locations. This LSDF is in particular detail clear about all government land parcels and the reflection of the development intention on those, which include residential. The Overlay Zone Review Process also supports the establishment of an improved regulatory environment aimed at including affordable housing in a range of typologies. Refer to the Human Settlement Theme in the Implementation Plan where various projects such as Leeuloop, Founders Garden, Roggebaai, Government Garages, Fruit & Veg site and various City owned land parcels are indicated to address the critical affordable housing demand in the CBD.
111		The document is insufficiently ambitious in relation to inclusionary housing, antidisplacement, public land release, and the realisation of the right to the city for low-income and working-class residents. Our submission highlights this gap between stated principles and practical implementation. The LSDF must therefore go beyond vague aspirations and establish measurable targets for affordable housing , the use of public land, and meaningful inclusion of historically marginalized communities.	LSDF should set targets for affordable housing	The LSDF cannot include instructions and targets in the absence of an Affordable Housing Policy depicting principles and preferred locations. This LSDF is in particular detail clear about all government land parcels and the reflection of the development intention on those, which include residential. The Overlay Zone Review Process also supports the establishment of an improved regulatory environment aimed at including affordable housing in a range of typologies. Refer to the Human Settlement Theme in the Implementation Plan where various projects such as Leeuloop, Founders Garden, Roggebaai, Government Garages, Fruit & Veg site and various City owned land parcels are indicated to address the critical affordable housing demand in the CBD.
112		The CBD is one of the most well-located, opportunity-rich parts of Cape Town. It is home to major employment nodes, transport infrastructure, cultural institutions, public services, and civic life. The LSDF is a vital opportunity to reverse the patterns highlighted in the previous point. We urge the City to adopt a bold, justice-oriented vision that proactively advances affordable housing, prevents displacement, ensures equitable access, and centres community participation.	LSDF challenged to adopt bold justice-orientated vision proactively addressing affordable housing, prevents displacement and ensure equitable access.	The LSDF cannot include instructions and targets in the absence of an Affordable Housing Policy depicting principles and preferred locations. This LSDF is in particular detail clear about all government land parcels and the reflection of the development intention on those, which include residential. The Overlay Zone Review Process also supports the establishment of an improved regulatory environment aimed at including affordable housing in a range of typologies. Refer to the Human Settlement Theme in the Implementation Plan where various projects such as Leeuloop, Founders Garden, Roggebaai, Government Garages, Fruit & Veg site and various City owned land parcels are indicated to address the critical affordable housing demand in the CBD.

113	Cape Town faces an acute housing crisis, marked by mass displacement and deepening informality. The CBD is a critical node for redress not only because of its economic significance, but because it symbolises the enduring spatial exclusion of working-class and poor residents. We believe that the LSDF falls short in acknowledging the full range of factors that shape housing opportunities in the CBD. Like many spatial frameworks, it lacks a critical reflection on the current status quo including reasons why previous plans have not delivered meaningful outcomes and fails to clearly articulate what will be done differently this time to ensure progress. Without this critical lens, the LSDF risks reproducing the same policy gaps and implementation failures that have contributed to the ongoing housing crisis experienced in Cape Town	LSDF lacks critical reflection on current status including reasons why previous plans for affordable housing have not delivered meaningful outcomes. Risk producing the same policy gaps and implementation failures that contributed to housing crisis.	The LSDF cannot include instructions and targets in the absence of an Affordable Housing Policy depicting principles and preferred locations. This LSDF is in particular detail clear about all government land parcels and the reflection of the development intention on those, which include residential. The Overlay Zone Review Process also supports the establishment of an improved regulatory environment aimed at including affordable housing in a range of typologies. Refer to the Human Settlement Theme in the Implementation Plan where various projects such as Leeuloop, Founders Garden, Roggebaai, Government Garages, Fruit & Veg site and various City owned land parcels are indicated to address the critical affordable housing demand in the CBD.
114	Airbnb - While a contextually responsive standalone short-term rental policy is urgently needed to regulate the sector more effectively, the LSDF must also incorporate regulatory mechanisms aimed at mitigating risks that contribute to the instability and decline of the affordability of the housing market. This includes measures to curb speculative investment, prevent displacement of lower-income residents, and ensure that land-use and zoning regulations actively support the development and preservation of affordable housing.	LSDF should include regulatory mechanisms for Airbnb	The LSDF is not a regulatory instrument. It sets vision and lay down principles. Airbnb regulation is currently being investigated by the City in partnership with the National Dept. of Tourism.
115	Digital Nomads - The CBD LSDF must acknowledge and address the distortions caused by the digital nomad phenomenon. The growing influence of short-term, high-income residents will continue to hollow out central Cape Town, turning it into a playground for the wealthy while deepening spatial inequality.	Digital nomads distorts the housing market and makes dwelling unit unaffordable for the working class.	The CT CBD's historical strategy to allow apartment hotels was part of the reason the CBD's buildings were not all completely hijacked and invaded, which were the pattern in other CBDs in SA - over the past 20 years. It may have contributed to the distortion but it also contributed to its resilience and strength as economic power house.
116	Affordable Housing - Until today no state-subsidised affordable or social housing projects have been completed in central Cape Town in the 30 years since apartheid ended. In the CBD we experience rising land values and a highly exclusionary property market meaning that even so-called “affordable” housing is out of reach for low- and moderate income earners working in the city. To address this crisis, we advise and demand that the City needs a coordinated, justice-oriented housing strategy that maximises the use of public land, enforces inclusionary housing, and ensures long-term affordability in central locations like the CBD.	No state-subsidised affordable or social housing projects have been completed in the CT CBD.	The LSDF cannot include instructions and targets in the absence of an Affordable Housing Policy depicting principles and preferred locations. This is under development. This LSDF is in particular detail clear about all government land parcels and the reflection of the development intention on those, which include residential. The Overlay Zone Review Process also supports the establishment of an improved regulatory environment aimed at including affordable housing in a range of typologies. Refer to the Human Settlement Theme in the Implementation Plan where various projects such as Leeuloop, Founders Garden, Roggebaai, Government Garages, Fruit & Veg site and various City owned land parcels are indicated to address the critical affordable housing demand in the CBD.
117	Inclusionary housing - While the LSDF indicates that an affordable housing policy is currently in the process of being formulated, it worryingly states that it will follow a voluntary opt-in approach. This is unacceptable, as inclusionary housing obligations need to be mandatory to be effective, as with the City of Johannesburg's inclusionary housing policy, with a variety of compliance options and incentives. The LSDF should make explicit commitments to integrating inclusionary housing requirements (via the inclusionary housing overlay zone mechanism) into its development guidelines, as well as through targets for affordable housing in all new large-scale developments in the LSDF area.	Voluntary IH obligations is not acceptable	This comment will be forwarded to the relevant department working on the Affordable Housing Policy.
118	Emergency housing - Emergency housing (as well as transitional housing) is not meaningfully addressed in the LSDF in any way, nor are there any concrete plans outlined for its integration into the spatial vision of the CBD. This is a major oversight given the scale of informal housing and displacement affecting low-income communities. The LSDF must acknowledge emergency housing as a legitimate urban housing typology by allocating land in the CBD for transitional and emergency accommodation, particularly on public land.	Emergency housing is not clear	This comment will be forwarded to the relevant department working on the Affordable Housing Policy and the Human Settlements Department
119	Homelessness - The LSDF makes almost no mention of homelessness and puts forward no proposals to address it. The LSDF must recognise homelessness as a spatial justice issue and addressing it should be central to the vision for an inclusive, just, and equitable city centre. Proposals in the LSDF should include making City-owned properties available via lease or discounted sale to organisations addressing homelessness, to be used for the variety of services that these organisations provide.	LSDF should be clearer about homelessness accommodation to be located on government land.	The relevant department is involved in the LSDF and there are projects in the Implementation Plan: Refer to Safe Spaces in Culemborg 1 & 2 (Project 123) and District 6 Shelter Expansion (Project 124). Comments to be forwarded to the relevant line department dealing with operational issue

120	Zami Mkhwanazi (Ndifun Ukwazi)	Informal Traders - Informal trading is a vital part of Cape Town's economy, especially for working-class residents who rely on it for survival in the face of high unemployment and limited formal job opportunities. The status of informal traders lacks sufficient infrastructure and services such as access to water, sanitation, trading shelters, or secure storage, of which exposes how traders are often not consulted meaningfully, or their needs taken into consideration, in upgrades, re-zoning decisions, or spatial frameworks.	Informal traders need infrastructure (trading shelters, secured storage) and improved consultation.	The relevant department is involved in the LSDF and there are projects in the Implementation Plan: Refer to: CBD Trading Plan (Project 031). Comments to be forwarded to the relevant line department dealing with operational issues.
121		The current quantum of trading spaces provided in the CBD is insufficient to meet demand and meaningfully address the rights to the city and livelihood opportunities of lower-income citizens. We request the LSDF to recognise the informal traders who are frequently marginalised or displaced in favour of tourism, aesthetics, or high-end retail, often under the language of cleaning up or revitalisation. Informal traders are a vital part of Cape Town's cultural and economic fabric and must be recognised as such through the LSDF by affirming the right to trade in public spaces and this would help legitimize their economic activity and prioritize their life in the CBD.	Not sufficient informal trading spaces in the CBD.	The relevant department is involved in the LSDF and there are projects in the Implementation Plan: Refer to: CBD Trading Plan (Project 031). Comments to be forwarded to the relevant line department dealing with operational issues.
122		Ensuring a world class city shouldn't sideline local livelihoods and informal traders should form part of Cape Town's identity. Lessons in this respect can be taken from other Global South cities such as Bangkok and Rio de Janeiro (UN-Habitat, 2020; Friendly, 2013). The LSDF presents a rare opportunity to institutionalise the inclusion of informal traders in the CBD's spatial vision , particularly in places like the Grand Parade, which embody both the city's history and the potential for a more inclusive economic future.	Include principles of informal trade on the Grand Parade	The relevant department is involved in the LSDF and there are projects in the Implementation Plan: Refer to: Grand Parade Activation and trading addressed under Project 078. Comments to be forwarded to the relevant line department dealing with operational issues and implementation.
123		In addition, the LSDF (and reviews of the CBD overlay zone) should include guidelines for the inclusion of a proportion of smaller retail and commercial spaces on the ground floor of new or redeveloped buildings , in order to allow for greater accessibility and affordability of retail and commercial space for small business in the CBD.	Development guidelines should be clear about smaller retail and commercial on ground floor in new or redeveloped buildings.	Project packaging on public owned land provides for residential led mixed use development, with retail on ground floor to activate the spaces around buildings, be outwardly facing and encourage pedestrian footfall.
124		Auction properties - When public land and buildings are sold to the highest bidder without conditions for affordability or inclusive development , it entrenches spatial inequality and excludes low-income residents from access to the inner city. Tenanted city properties which are auctioned off, worsen the housing crisis, as these tenants will need to find subsidised housing in the City, which is already oversubscribed and failing. The LSDF must instead prioritise the use of all public land and buildings for a meaningful ratio of well-located affordable housing, aligned with constitutional obligations and housing policy goals.	Inclusionary housing should be a minimum requirement of government land redevelopment or alienation.	The LSDF cannot include instructions and targets in the absence of an Affordable Housing Policy depicting principles and preferred locations. This is under development. This LSDF is in particular detail clear about all government land parcels and the reflection of the development intention on those, which include residential. Project 001 related to rationalisation of the CBD overlay zones which will include provision for inclusionary/affordable housing, should be noted. Refer to Human Settlement Theme in Implementation Plan where various projects such as Leeuloop, Founders Garden, Roggebaai, Government Garages, Fruit & Veg site and various City owned land parcels are indicated to address the critical affordable housing demand in the CBD. Proposals to preserve affordability is under investigation.
125		Gentrification - Gentrification in Cape Town, particularly in the inner city and surrounding areas, has led to the displacement of low-income and working-class residents, deepening the housing crisis and reinforcing spatial apartheid. Rising property values, market-driven development, and the commodification of well-located land exclude historically marginalised communities from accessing affordable housing near economic opportunities. The LSDF must promote market-led mega projects with firm commitments to the social and market value of land. This can be realised by including commitments to inclusionary housing. The LSDF is a tool to create a mandate on inclusionary housing requirements in all new developments.	LSDF is a tool to create a mandate on inclusionary housing	The LSDF cannot include instructions and targets in the absence of an Affordable Housing Policy depicting principles and preferred locations. This is under development. This LSDF is in particular detail clear about all government land parcels and the reflection of the development intention on those, which include residential. Project 001 related to rationalisation of the CBD overlay zones which will include provision for inclusionary/affordable housing, should be noted. Refer to Human Settlement Theme in Implementation Plan where various projects such as Leeuloop, Founders Garden, Roggebaai, Government Garages, Fruit & Veg site and various City owned land parcels are indicated to address the critical affordable housing demand in the CBD. Proposals to preserve affordability is under investigation.
126		Evictions - The LSDF must aim to make an impact of past evictions and the ongoing housing crisis in shaping the current urban landscape and this will be achieved by commitment to developing affordable, mixed-income housing within the CBD to prevent further displacement of low-income residents.	LSDF must stake a stand on evictions	Evictions are very case specific and are legislated through statutory processes. The LSDF cannot deal with those a it does not give or take away land use rights.

127	Implementation framework - The LSDF's implementation framework outlines broad strategies for land use, development incentives, and public-private partnerships, but lacks clear, binding commitments to deliver well-located affordable housing. It emphasizes market-led development and catalytic projects without prioritizing the use of public land for inclusive, mixed-income housing. To truly address Cape Town's housing crisis, the implementation framework must centre affordable housing delivery as a core outcome, with measurable targets and accountability mechanisms.	Implementation Plan lacks binding commitments for AH.	The LSDF cannot include instructions and targets in the absence of an Affordable Housing Policy depicting principles and preferred locations. This is under development. This LSDF is in particular detail clear about all government land parcels and the reflection of the development intention on those, which include residential. Project 001 related to rationalisation of the CBD overlay zones which will include provision for inclusionary/affordable housing, should be noted. Refer to Human Settlement Theme in Implementation Plan where various projects such as Leeuloop, Founders Garden, Roggebaai, Government Garages, Fruit & Veg site and various City owned land parcels are indicated to address the critical affordable housing demand in the CBD. Proposals to preserve affordability is under investigation.
128	A crucial aspect in addition to the LSDF is setting measurable targets for affordable housing delivery within the LSDF area, aligned with the City's broader housing and spatial justice goals. Without these changes, the LSDF will become another vehicle for market-led gentrification, rather than a transformative tool to dismantle apartheid-era exclusion and inequality in the inner city.	Include monitoring system for AF	LSDF monitoring plan to be included as an action in the Implementation Plan.
129	Budget analysis - The LSDF's budget plan outlines funding for public realm upgrades, infrastructure, and catalytic projects, but it lacks dedicated, ring-fenced funding for affordable housing delivery. By prioritising market-enabling infrastructure and private-sector-led developments, the budget fails to directly support inclusive, mixed-income housing or the use of public land for social benefit.	Budget in IP lacks dedicated ring fenced funding for AH.	The Implementation Plan did not include a budget analysis. The intent is to use the value of public land to enable social benefit including affordable housing and public realm improvements in support of the anticipated densification of residential development in the CBD. No funding in the City is ring fenced, not even for infrastructure services upgrades for certain critical locations.
130	Without a clear financial commitment to addressing the housing crisis, the LSDF risks perpetuating spatial inequality rather than actively redressing apartheid-era exclusion through transformative investment in affordable, inner-city living. The LSDF must allocate dedicated funding for affordable housing delivery within the CBD, including for land acquisition, social housing construction, and support for community-led initiatives.	Clear financing plan and commitment required for housing crisis.	Affordable housing is enabled through Land Value Capture of public land and feasibility is determined on a site to site basis.
131	As Cape Town positions itself as a globally competitive, world-class city through the LSDF, it is critical that this vision does not come at the expense of addressing the housing crisis or deepening spatial inequality. The aspiration to emulate cities in the global North often overlooks South Africa's unique historical context specifically, the enduring legacy of apartheid-era spatial planning, which systematically excluded Black, Coloured, and Indian communities from well-located urban areas. Unlike the cities Cape Town draws inspiration from, Cape Town's urban fabric has been shaped by forced removals, racial segregation, and land dispossession, resulting in severe structural inequality that persists today.	For CT to be competitive the vision cannot be at the expense of addressing the housing crisis.	Many themes compete for acknowledgement in the vision. The CBD is the economic engine of the City as a whole and the larger province. A fine balance is required between the components of the vision. Redress can not dominate all other economic drivers as reflected in the vision. The LSDF cannot include instructions and targets in the absence of an Affordable Housing Policy depicting principles and preferred locations. This is under development. This LSDF is in particular detail clear about all government land parcels and the reflection of the development intention on those, which include residential.
132	The housing crisis in Cape Town is not merely a technical or economic problem, but a manifestation of entrenched injustice. The demand for housing in well-located areas especially in the CBD and surrounding precincts is a direct outcome of decades of spatial exclusion that relegated most of the population to the city's periphery, far from economic opportunities, public services, and infrastructure.	Housing crisis manifests as entrenched industries in the CBD unless vision changed.	Many themes compete for acknowledgement in the vision. The CBD is the economic engine of the City as a whole and the larger province. A fine balance is required between the components of the vision. Redress can not dominate all other economic drivers as reflected in the vision. The LSDF cannot include instructions and targets in the absence of an Affordable Housing Policy depicting principles and preferred locations. This is under development. This LSDF is in particular detail clear about all government land parcels and the reflection of the development intention on those, which include residential.
133	While the LSDF promotes infrastructure upgrades, tourism, and high-end development to position the CBD as a thriving urban core, in its current form, will replicate the patterns of exclusion that define Cape Town's history. Without an explicit, prioritised commitment to spatial redress, the LSDF will become a blueprint for urban gentrification, rather than a tool for inclusive transformation. The City's focus on creating a world-class urban image should not overshadow its constitutional obligation to provide access to adequate housing and redress past injustices.	Vision needs to explicit in prioritising spatial redress	Many themes compete for acknowledgement in the vision. The CBD is the economic engine of the City as a whole and the larger province. A fine balance is required between the components of the vision. Redress can not dominate all other economic drivers as reflected in the vision. The LSDF cannot include instructions and targets in the absence of an Affordable Housing Policy depicting principles and preferred locations. This is under development. This LSDF is in particular detail clear about all government land parcels and the reflection of the development intention on those, which include residential.

134	LSDF must foreground the urgency of the housing crisis as a central development priority . This includes making well-located affordable housing a non-negotiable outcome of public land use, embedding affordable housing in all areas, as well as inclusionary housing requirements in all new developments, and ensuring that investments in infrastructure and public space benefit all residents, not only the affluent.	Housing crisis must be key part of CBD LSDF Vision. AH should be clear outcome of public land and AH (&IH) should be part of all new developments.	Many themes compete for acknowledgement in the vision. The CBD is the economic engine of the City as a whole and the larger province. A fine balance is required between the components of the vision. Redress can not dominate all other economic drivers as reflected in the vision. The LSDF cannot include instructions and targets in the absence of an Affordable Housing Policy depicting principles and preferred locations. This is under development. This LSDF is in particular detail clear about all government land parcels and the reflection of the development intention on those, which include residential.
135	Prioritize Affordable Housing as a Core Objective - Clearly position well-located affordable and inclusive housing as a central priority of the LSDF , not as a secondary or future consideration. Include binding inclusionary housing requirements for all new residential and mixed-use developments in the CBD.	Affordable housing should be a central priority in the LSDF and include binding requirements for all new residential and mixed-use developments.	The LSDF cannot include instructions and targets in the absence of an Affordable Housing Policy depicting principles and preferred locations. This is under development. This LSDF is in particular detail clear about all government land parcels and the reflection of the development intention on those, which include residential. Project 001 relates to rationalisation of the CBD overlay zones which will include provision for inclusionary/affordable housing, should be noted. Refer to Human Settlement Theme in Implementation Plan where various projects such as Leeuloop, Founders Garden, Roggebaai, Government Garages, Fruit & Veg site and various City owned land parcels are indicated to address the critical affordable housing demand in the CBD. Proposals to preserve affordability is under investigation.
136	Utilise Publicly Owned Land and Buildings for Social and Affordable Housing - Prevent the sale or auction of tenanted homes and well-located public land without first exploring its potential for mixed-income, public good-oriented development. Ensure all City and Provincially owned land in the CBD is assessed for social housing development potential, with transparent public participation.	Use publicly owned land and buildings for social and affordable housing (prevent sale of tenant homes, or well-located land without consideration of mixed income housing)	The LSDF has a long table with all government owned land and the development opportunities under investigation. All of them are mixed use and if residential (will be mixed income). Refer the Implementation Plan: Project 001 relates to rationalisation of the CBD overlay zones which will include provision for inclusionary/affordable housing. Refer to Human Settlement Theme in Implementation Plan where various projects such as Leeuloop, Founders Garden, Roggebaai, Government Garages, Fruit & Veg site and various City & Provincially owned land parcels are indicated to address the critical affordable housing demand in the CBD. Proposals to preserve affordability is under investigation.
137	Embed Spatial Redress as a Guiding Principle in All Planning Decisions - Frame the LSDF's vision explicitly around redressing apartheid spatial injustice, with measurable equity indicators and redistributive outcomes. Require that all catalytic and infrastructure projects demonstrate how they will advance spatial transformation and inclusion.	Vision should be around redressing apartheid spatial injustice	The vision is about optimising opportunities for economic growth for all residents and visitors. The vision cannot only be about redress.
138	Protect Against Displacement and Gentrification - Integrate anti-displacement mechanisms such as rent stabilization, protection for long-term tenants, and community land trusts. - Halt evictions without meaningful relocation options in or near the CBD that respect dignity and access to opportunity.	Establish protection mechanisms against displacement and gentrification	The LSDF cannot include instructions on institutional arrangements in the absence of an Affordable Housing Policy depicting principles and preferred locations. The AHP is under development.
139	Support Non-Market and Community-Led Housing Models - Allocate land and funding for social housing institutions, housing cooperatives, and community-driven development models. Establish public community partnerships to deliver housing that prioritises long-term affordability and tenure security.	Allocate land and funding for social housing and establish new generation institutional arrangements	The LSDF cannot include instructions on institutional arrangements in the absence of an Affordable Housing Policy depicting principles and preferred locations. The AHP is under development.
140	Ensure Transparent, Accountable, and Inclusive Planning Processes - Include civil society, housing activists, and affected communities in decision making structures for LSDF implementation and monitoring. Commit to regular public reporting on affordable housing delivery and progress toward spatial transformation goals.	Regular reporting on affordable housing delivery should be build into the M&E Programme for the LSDF	Consideration will be given in the update of the monitoring component of the Implementation Plan.
141	Address Intergovernmental Coordination Failures - Clearly define the roles and responsibilities of the City, Province, and national departments in housing delivery within the CBD. - Advocate for alignment of municipal, provincial, and national housing policy to overcome implementation blockages like those seen in the Tafelberg and Bromwell cases.	Roles and responsibilities of inter-governmental role-players in provision of affordable housing in the CBD should be clarified	Instructions will have to be included first in the Inclusionary Housing Policy and Implementation Plan
142	Integrate Lessons from Landmark Legal Cases - Acknowledge and apply findings from the Bromwell and Tafelberg cases to guide land use, emergency housing provision, and urban redress. Ensure that the LSDF's provisions are constitutionally compliant and aligned with evolving jurisprudence on spatial justice.	Incorporate lessons learned from Tafelberg site into CBD vision	Noted

143	The draft LSDF represents a critical opportunity for the City of Cape Town to shift away from a development model that has historically prioritised private sector growth and investment at the expense of social redress. As it stands, the LSDF will reinforce patterns of exclusion unless it places social equity, spatial justice, and public good at the centre of its planning vision.	LSDF should redress social inequality, enforce public good in the vision.	Noted
144	Ndifuna Ukwazi believes that the LSDF must set a new precedent: that public land and planning must serve the public good. We will continue to engage, monitor, and advocate to ensure that the LSDF is a tool for building a truly inclusive, just, and spatially transformed Cape Town not just a “world-class” city, but a city for all.	Acknowledge role of LSDF	Noted this was exactly why the document contains the principles of public good
145	We support the process of converting the MSDF into a series of LSDFs in order to provide strategic development, and the proposed CBD LSDF is well-intentioned.	MSDF cascading to LSDF is supported	Noted
146	The mismatch between vision and execution - The LSDF refers to “transition” but is silent on what it is transitioning to. There is no clear economic statement of intent that leads to urban design response. The LSDF should provide a visionary and clear direction of travel in an enabling and guiding manner. Instead, it only provides a short generic vision statement followed by standardised urban design theory and diagrammes. Failing a clear growth strategy statement, the approach may only lead to more subjective opinion responses in assessing future land-use applications.	Vision not strong enough on economic and tourism matters. Need a growth strategy.	Noted vision to include growth component. Vision and subsequent material do highlight anticipated changes in the built environment which implies significant economic growth.
147	We propose that the vision statement be replaced with the following and that the LSDF be redrafted to compliment the following: “The original economic logic of the Cape Town CBD, founded on a marine, agriculture and government economy, has substantially changed over the years. Today, the CBD economic hierarchy is primarily based on the tourism sector, underpinned by heritage and natural beauty, followed by substantially reduced finance, governance and legal components. The significant role that the harbour economy plays directly in the CBD, has reduced to the accommodation of cruise liners and recreational craft, support services and yacht construction as well as the tourism interface provided by the V&A. The rest of the harbour trade revenue decants worldwide to operating offices located in other parts of the world bypassing the CBD of Cape Town. To strengthen the CBD economy and ensure longevity, the vision for the CBD is to be an internationally recognised tourism and IT innovation hub, supported by being an internationally recognised conference node. The vision is supported by the support and strengthening of the secondary layers, being commercial and retail support and housing. The vision of a quality urban space will be realised by structuring quality and safe connectivity and linkages between the various building blocks of the CBD.”	New vision proposed	Proposal noted for adjustment in document.
148	Ideally, the LSDF should have been drafted from an economic growth perspective, allowing for a level of out-of-the-box responses from the market. Unfortunately, the draft LSDF appears to be drafted from a narrow urban-design perspective on how CBD should be developed from a town-planning perspective only. This perspective is valid and good, and is certainly one scenario that may play out. However, cities need to be places of “1 000 designers” to flourish. The local authority's necessary role to guide and manage planning can be done in an enabling way that permits a variety of scenarios, without prescribing one preferred scenario.	Economic vision to be articulated better. Maybe scenarios should be explained	Proposal noted for adjustment in document. The growth scenarios for 2050 is included in the Land Use Model 2050 and the MAP Document and will be references better
149	The local authority needs not hold the full vision for the city, including its relationship with all other urban nodes in the metropolitan area, and it should share the developing vision among the entire citizenry over the very long term. The CBD is only one building block in the tapestry, but a significant one if treated within in its unique strength and economic potential. This requires honesty on what the CBD is and can be.	Vision should be held by Council and shared with other citizens	The vision for the CBD is in the MSDF, DSDF etc
150	Relationship with other business nodes - An introductory section that provides an overall “helicopter” view of how the proposed direction of the Cape Town CBD will relate to and encourage the development of other business nodes in Cape Town is missing. It appears to be a “business as usual” strategy that simply magnifies the many things that the CBD has traditionally been and seems to assume that it should continue to grow in the same direction.	Relationship with surrounds	The vision for the CBD is in the MSDF, DSDF especially wrt the relation to other nodes and the roles

151	Deon van Zyl	It is the time to create a bigger, bolder vision that speaks to the socio-economic asymmetry that has for decades stifled Cape Town. The current CBD plan appears to simply exacerbate the problems that this specific area – an area constrained between mountain and sea already – continues to encounter. While we applaud the initiatives to green the area and make it more pedestrian-friendly, a vision to drive it in the economic directions to which it is most suited, and encourage diversification to other areas , is missing. The current plan does not address economic growth and focusses exclusively as a beautification project.	Need better boulder vision, need to highlight the diversification to other areas	Noted
152		It appears that the central CBD will increasingly be promoted as a generic “ best place in town ” to invest without actively relating to other CBDs and nodes in the metropolitan area . The current approach will not alleviate but rather exacerbate the critical problems around transportation in and out of the CBD with its promotion of ever-increasing office space, and the assumption that it will remain the single largest employment area in the metro. Nor will the proposed residential growth make any difference to this challenge.	Best place' vision will exacerbate critical problems of transportation, over emphasis of office provision, false assumptions of largest employment area. Will not solve residential growth as proposals.	Noted
153		Regressive view of heritage resources and related long-term risks - In general terms, Cape Town has the joy of one truly outstanding heritage resource of global significance, which is the Cape Floral Kingdom. This must be protected at all costs. Thereafter, there are the UNESCO sites (e.g. Robben Island) which too must be protected as significant global resources.	Cape Floral Kingdom not highlighted enough in vision	Noted
154		Beyond this, Cape Town has a very small number (in global terms) of well-made buildings from the 1800s to 1950s. As can be seen in countless global examples (Shanghai and Sydney to name two large examples, and Cincinnati being a relevant example to Cape Town in terms of size, age and density of older buildings), such buildings should be integrated into and embraced as and when development sweeps through such metropolitan areas.	Protect well-made buildings from the 1800s to 1950s.	Noted
155		CBD - relation to other nodes	already addressed above	already addressed above
156		Our larger concern is that this short sighted approach to heritage resources management will have the following outcomes: 1. In the short term, a constraining of development in the CBD in order to protect a small number of built heritage resources in an urbanising city will result in more urban sprawl, with inevitable damage to the true heritage resource (the Cape Floral Kingdom). 2. In the long term, we cannot foresee that future administrations will maintain this myopic and regressive policy approach. Our fear is an inevitable overcorrection of policy in future, which may result in the granting of demolition orders to the very same 1800s-1950s buildings that are being overprotected now.	Short sighted approach to heritage resources management has implications	Constrain CBD Growth to protect a small nr of resources
157		Future trends based on historical trends not vision - The document seems to simply promote the growth of the same multi-faceted factors that currently place the Central City under enormous strain. Our concerns can be clearly understood and summarized simply by looking at Chapter 5.8: Anticipated land use growth in the medium term (10 years).	vision	
158		The predictions for the future seem to be based entirely on historical trends and baseline data, without any attempt to encourage what the Central City could do best (i.e.: a stronger emphasis on tourism, residential, retail, educational institutions, conferencing and exhibitions), while encouraging certain sectors currently taking up office and industrial space to possibly consider other areas in Cape Town for more viable economic growth – both for those areas and for the sectors themselves.	future projections	
159		We feel the LSDF falls into the trap of planning that relies on no more than the historical trends that exist, rather than a more outward-thinking, innovative plan that proposes solutions to a metropolitan city that is still structured along Apartheid lines.		

160	To this end, we note two examples, the first being Munich which took the wise decision in 1998 to develop its highly integrated development concept "Perspective Munich" that embraces both a prospering city and mega-city region. In contrast to this, you have the failings of São Paulo which allowed its city centre to grow unsustainably, resulting in the significant challenges it now faces. These include inadequate housing, environmental problems like pollution and water shortages, severe issues with public services like sanitation and infrastructure and in addition traffic congestion, crime and economic inequality – all contributing to a massively challenged urban environment from which it seems unable to return. And all of this the result of continually investing in the area in which it saw the "most confidence".		
161	Bypass route will isolate the CBD - We must also note with concern what appears to be the re-incorporation of what has become known as "Solly's Folly" in 6.1 Development Strategies, particularly 6.1.1 (Mobility Strategy), the massive bypass conceptualised in the 1970s that will further isolate the Central City, and sever it from the rest of the metro. Section 3.1 of the analysis discusses transport infrastructure that segregates, divides and sterilises parts of the urban landscape, including the freeways (Foreshore Freeway, N1 & N2), and the railway lines and terminus station. Yet the same document proposes a similar strategy in the bypass route. Part of what is driving the congestion is the massive imbalance between residents and jobs. The emphasis should therefore be on a land-use shift to additional residential units and improved public transport routes rather than new roads.		The CBD Mobility and Access Plan is not proposing additional infrastructure to serve as the bypass system for the CBD; it finds that the bypass system is already in place, and must be accompanied by supportive decongesting interventions within the bypass system. Additional freeway capacity is neither required nor proposed by the CBD Mobility and Access Plan. There is however another project investigating the future of the Foreshore Precinct, including the freeways, and land for housing and mixed use development, which this plan is participating in. Yes, the plan supports and is premised on the increase in residential development for a variety of income levels.
162	Port Functionality and Urban Design - The current vision for the port and its importance for the CBD need to be unpacked. The Port is an important land use; however, its role with relation to the surrounding smaller ports and harbours (similar to the role of the CBD in relation to the other surrounding Business Districts), requires a vision and focus. There are limits to its viability as a commercial port due to technical limitations and size, and its role in support of the vision for the City is critical. IE if the vision for the CBD is to encourage tourism and heritage, then the Port's role in supporting this is vital.	port function and urban design	
163	It is suggested that the City should engage with the port authorities to develop a collaborative plan that addresses a collective vision. At the same time, the Port can assist in alleviating some of the congestion currently experienced by the CBD at the local level, through the utilisation of some of its infrastructure for public transportation purposes such as Duncan Road.	port function	
164	Administrative challenges - The CBD is already guided by the DMS, the CBD local area overlay, and the related densification, urban design policy and tall building policies. These documents contain sufficient controls and encodings of qualitative design guidance in order to guide development, along with the multiple opportunities for public participation per application. Adding further administrative processes and requirements to this will lengthen application timeframes which are already so long and unpredictable that large capital flight is taking place from the CBD and into jurisdictions where planning approval timeframes are more predictable. Lastly, it is plain that the City has not carried out a regulatory impact assessment on this proposal, despite being asked to do so in the round one comments.	administrative	
165	Legal challenges - It is our understanding that the Urban Design Department and Heritage Department have commented on capacity only, and have no delegated decision-making authority. While there is a promulgated urban design policy, the lack of departmental authority places enforcement of this policy with the planning officials. It cannot follow that adding a design-driven policy to the mix without the necessary underlying legal capacity within the appropriate departments is either a good or useful policy.	Legal capacity of authors versus regulatory functions	

166	Design challenges The LSDF map makes a laudable attempt at mapping the current built form and short-term development trajectory. As pointed out at length by others in the round one comment, the "indicators" supplied in the LSDF only provide a very rough guide, and lack the nuanced detail required to be functionally useful at the level of an application. The indicators therefore remain of no use, but could be used as a basis to comment on applications if the LSDF is promulgated. The outcome of this will be further opiniated debates on the merits of applications without the necessary policy detail upon which to act.	development guidelines	The LSDF is intended as a spatial forward planning tool. This policy document will guide regulatory change through LA0/4 . Refer to chapter 5,7 regarding the economic lens to be applied.
167	The lack of clarity and purpose of the LSDF, plus the duplication of existing polices, the constraining nature of the proposals in the LSDF, and the lack of usefulness of the guidance in the LSDF, means that this endeavour should be reviewed, which requires an updated draft of the LSDF.	development guidelines	
168	The LSDF must be informed by a clear economic growth vision, currently missing in the draft LSDF.	vision	
169	Local authority capacity must be allocated to applications based on current policies.		
170	A long-term view of heritage resource management view must be taken, this to be encoded in policy, and this policy tested through a regulatory impact assessment prior to promulgation.	heritage	
171	The LSDF must endorse the universally-agreed basics of the built form of thriving cities – which can be summarized as fine grain, high density, mix of uses and active streets. This must become the focus of administrative capacity through existing policies.	development guidelines	Noted , Support for fine grain , high density, mix of uses and active streets should be the focus of administrative capacity through existing policies. This lower order plan relies on those existing policies and gives locational guidance .
172	Achievable and practical additional enabling measures, such as urban greening, be added to future iterations of existing policies.	practical enabling actions, related to greening	Refer to Project 005, Landscape Framework Plan for the CBD
173	It is good to see this people centric approach to streets understood and promoted in the proposed documentation for the historic parts of the central city. However, the issue is why these Urban Design people centric principles are not extended to the foreshore precincts so as to guide future development back into a more appropriate human scale and human centric direction? (Or perhaps this issue is addressed in the document somewhere and I missed it. But that speaks to the issue raised earlier and that being the more layers of policy documents, the longer the documents, the more words, the more likely people are not going to read through them properly, and the more likely important points get obscured or overlooked completely.)	development guidelines, CBD MAP	Noted, recommendation to extend these principles to the Foreshore, by way of example related improvements for streets and interfaces such as DF Malan, Lower Long, Lower Bree . In addition it is noted that 5.6.5 East Foreshore Precinct (precinct 9), page 92-94, and Precinct 6, page 80, 5.6.2. West Foreshore Precinct (precinct 6) could be supplemented to address this concern. Also Table 5-1: Schedule of route classifications, typical characteristics and designations, can be reviewed in light of this comment. This statement requires review with CBD MAP team in relation to 6.1.1. Mobility Strategy. The drafting team & CBD_MAP to review the Foreshore streets Lower Long, Lower Bree, DF Malan, Jan Smuts, Hammerschlag.
174	Also the greater longer term future vision planning seems absent . What about the greater longer term future vision of Cape Town once again reclaiming the foreshore for the City to give back to the City both a symbolic and meaningful direct connection down the Adderley street axis to the sea as a coastal port city? (The same again if I have indeed again overlooked this being addressed in the documentation.)	Vision should have longer term component	The Port has a security boundary . Discussions held to date indicate that due to Port operations, it is unlikely there will be an opportunity to bring Adderley ' to the water's edge' within the timespan of the LSDF .The LSDF hence promotes the gateway to the Cruise Terminal and V&A connection and Roggebaai canal system. The LSDF proposes an urban public space at the end of Adderley (shown as a linear urban park) where visual connection to the Port is made. The authors note constraints & 'fixes' (CTICC 2 sky bridge, CTICC 2 development future block, CTICC back of house operations) will all influence the gateway into the Foreshore Freeway precinct from Adderley.
175	"Fine Grain", "High Density", "Mixed Use" development on a "Perimeter Block development typology", respecting the street with "Active Street Frontages". "High Density" and "Mixed Use" Of the five items listed above as requisites for good urbanism, "High Density" and "Mixed Use" are both reasonably well known and recognized by most people as what is required. Hence I am not going to go into those here as that would be preaching to the converted.n What is less well known is how "High Density" and "Mixed Use" on their own are NOT sufficient to achieve the desired outcome. This is under appreciated. There are many urban precincts that are both "High Density" and "Mixed Use" that are abysmal environments to live in. All one has to do is think of those massive social housing tower blocks placed arbitrarily in space that certainly meet the requirement of high density and often even mixed use but are still abysmal environments to live in.	High density and mixed use alone is not enough to create urban character.	Support for fine grain, high density, mixed use terms noted. High density & mixed use are insufficient to achieve the desired outcome. These terms can be defined more clearly. The authors understand the commentator is advocating for fine grain in each case.

176	Matthew Gray Architects & Urban Designers	“Perimeter Block development Typology” For built environment to come together and function as required, it is critical that buildings need to be understood not as individual freestanding objects in space, without collective social responsibility, but rather as needing to perform an important social role, working together collectively to define public front, the street frontage as separate from private back. This ties into point 1. above. It is the buildings that define a street, the public space. It is the road surface that defines a road.	urban design, perimeter blocks	Agreed , noting perimeter blocks work well at a certain scale, 8-12 storeys. Above for example 38 meters, certainly 60m, there are challenges regarding light and wind into a central courtyard . That being said, positive and active interfaces are supported and described in the guidelines.
177		“Active Street Frontages” It is now reasonably well know that we can judge the safety, and general delight and liveability of our built environments by how active our street frontages are. What is less well known is how if all the other factors of “Fine Grain”, “High Density”, “Mixed Use” development on a “Perimeter Block development typology” are in place then “Active Street Frontages” typically fall into place as a natural consequence of the above. This does not mean we should not have measures in place to penalize blatant disrespect and abuse of the street frontage. Buildings that turn their back on the street and present just blank high walls are committing an act of social violence by shirking their responsibility to hold to basic niceties of respecting the public realm, keeping it safe with “eyes on the street surveillance” etc. If we have bylaws against other antisocial behaviour conducted in the public realm, like littering, urinating in our streets, then surely we should have bylaws in place against the worst offenders responsible for making our streets unsafe and unpleasant, that being buildings that turn their backs on the street.	Active street frontages should be promoted strongly in the design guidelines and even legislated.	Noted
178		“Fine grain” Of all the requirements listed above the one that has been the least understood and most neglected, particularly for the CBD, has been the need to have “Fine grain” urban fabric. It is not as if the concept of “fine grain” has not been known about. It has. The issue is that its central and critical role, as indeed a non negotiable prerequisite for built environments to manifest the qualities we desire of them, has either been poorly understood, not properly appreciated or missed completely. Also fine grain must also not be confused with low rise or low density. (See following Japanese examples of high density, relatively high rise (ten story) fine grain urban fabric.) Because of this it has been one of the things most neglected in the past with there being little to no hard and fast requirements in our edifice of Planning law to control for it. And this issue has not only been a problem in Cape Town, it is an issue that has blighted cities the world over. Arguably this is still the case. Even though in the proposed document set there is often reference to the need for fine grain urban fabric, this is typically added in as along with a whole word soup of other nice sounding buzzwords like sustainable etc. etc. The effect is to render the concept mute of any real implementable action.	Suggestions on refined wording re fine grain	Noted
179		Of course there are Urban Design aware Architects but the majority of Architects were and still to this day, are educated in the Modernist tradition with no Urban Design understandings. The same goes for the majority of Town Planners and Road and Traffic Engineers which were and still to this day are educated in the Modernist conception of city making with no Urban Design understandings. This problem is further exacerbated by there being an incentive by big business and unscrupulous built environment professionals for this to increase on an ever increasing scale because designing one big bad building is a lot easier and cheaper to do than a few smaller well designed ones.	Concerns with giant buildings and lack of enforcement on small scale or find grain	Noted

180	Why is it that it is almost always the historic core of cities the world over that are the pieces of urban environment that most people enjoy, celebrate, revere and want to preserve? This is true of Cape Town as applicable to its historic core too. Indeed it is this that no doubt underpins why we are having so much attention paid to the CBD as in these proposed policies and not paid to Manenberg on the Cape Flats or anywhere else on the Cape Flats for that matter. The usual assumption is it is the nostalgia for the quaint old buildings of yesteryear. For this reason there is wide support (except perhaps by most developers) for heritage legislation aimed at protecting historic buildings. While nostalgia for the quaint old buildings of yesteryear, is definitely a factor, I fear that it leads us to think no further and actually miss a more important factor. This misconception has two negative consequences. Firstly, it makes us think that what we need to do is focus on preserving in time individual artefacts, (individual buildings). Secondly, it blinkers us from understanding why it is that the new environments we create feel so impoverished and dismal compared to the historic ones and so fail to realize what we need to do to not only protect our historic environments but also put in place in our new environments to have desirable outcomes.	New parts of the city need to have character which connects with character areas in historical core, not only giant buildings	Noted
181	So what is the misconception? Yes there are often beautiful old buildings ornately decorated that we know wouldn't be built today and so want to preserve. But equally often there are whole precincts that we enjoy but if we actually examine each building in isolation they are nothing special and often even rather crude and rudimentary, so why would we even want to preserve these buildings? But there is the clue. The misconception is that it is primarily the old buildings that we are enjoying, when it is not. What we are primarily enjoying are urban environments as were created as before the Modernist conception of city making took hold. What we are primarily enjoying are urban environments of “Fine Grain”, “High Density”, “Mixed Use” development on a “Perimeter Block development typology”, respecting the street. Buildings, understood not as individual freestanding objects in space but rather as having an important social role in needing to work together collectively to define public front, the street frontage. Streets understood as public space for people and not as roads for cars. The historic buildings are a proxy for what we truly value, need, want and should have a right to expect and that is a built environment that actually works and meets our requirements for quality of life. This is why just preserving individual historical buildings doesn't cut it. Far more important is preserving the fine grain of the urban fabric and in new precincts putting in measures to ensure a fine grained urban fabric that guards against the alienating effects of over scaled boring megalithic monoliths taking up whole blocks.	It is not about historical buildings individually or as a group, but the value lies in the human interaction it generates. New parts of the City should seek to replicate or developed along the same line.	Support for fine grain, high density, mixed use terms noted. High density & mixed use are insufficient to achieve the desired outcome. These terms can be defined more clearly. The authors understand the commentator is advocating for fine grain in each case. Whilst in principle this is supported and embedded in the precinct guidelines, there are challenges on how this is achieved , with challenges of ' faux fine grain' , when blocks are consolidated, or when a market driven development typology may not achieve fine grain . Notwithstanding, the document can improve highlighting this point as guidance especially within the Foreshore.
182	Policy documents that use all the right words and say all the right things are all very well, but unless these concepts are honed down into actual tangible testable mechanisms of enforcement as implemented across the full spectrum of planning law, then they stay as just a word soup of nice buzzwords that we all pretend to pay lip service to but of no effect in actually achieving the desired outcomes. (Or worse still they get cherry-picked for nice sounding words to be used, as many politicians use words to make nice sounding but ultimately completely empty promises, as cover for other undesirable ends.)	Policy wording needs to be taken forward into implementation and enforcement	Noted . The LSDF can set a spatial forward planning vision, at the level of principle. This informs regulatory change as advocated for in the document. Refer to page 62 .
183	fine grain must not be confused with low rise or low density (as it would seem is being confused in the proposed documentation). Instituting measures to ensure fine grain as a non-negotiable necessity does NOT mean instituting measures to restrict building heights to low rise and low density. In fact the opposite is the case. We need measures to ensure fine grain precisely so we can enjoy the benefits of high rise and increased density without the negative effects of consolidation that typically happens when building heights increase. Fine grain is a non-negotiable necessity, that we need across the board old and new, low rise or high rise.	Fine grain should be illustrated and not only mentioned.	Noted and development guidelines may be reviewed.

184	We support this LSDF and its accompanying Mobility Plan because it charts a new direction — one that is mobility-first, housing-conscious, spatially just, and rooted in the public realm. We are especially encouraged by the shift in emphasis toward a mobility-first framework that prioritises walking, cycling, and public transport, and that aligns land use with access to opportunity. As the LSDF notes, “a liveable environment is an investable environment and caring city” (LSDF, p. 13) — and this plan recognises that mobility is not just about infrastructure, but about justice, proximity, and who the city works for. We offer this comment in strong support of the plan’s intent — and with the aim of helping to sharpen its delivery, clarify its implementation mechanisms, and push for accountability in achieving the inclusive CBD it envisions.	Support for LSDF and MAP documents	Noted
185	We support the continued classification of key arterials like Strand Street and Buitengracht Street as Mobility Routes, as described in the draft CBD Mobility & Access Plan (Annexure B, p. 11). However, we urge the City to clarify and fast-track critical interventions to improve pedestrian safety and non-motorised transport (NMT) access — particularly in areas where infrastructure already resembles active mobility streets but still fails to support safe, dignified movement.	Request prioritisation of pedestrian safety initiatives	Thank you for the proposals. It will be forwarded to the Urban Mobility Directorate for use during further project design for implementation and monitoring.
186	Despite their high-mobility designation, these corridors directly serve major public transport nodes, educational institutions, residential areas, and job centres. As such, they carry a disproportionate burden of pedestrian and NMT users — yet the street design continues to prioritise private vehicles . There is a difference between prioritising private vehicles and making the street a death trap for non-motorised transport users.	Concepts should be implemented.	Noted with thanks. There is indeed a need for improvement to these streets for pedestrians and cyclists, within the constraints of their mobility function. Safety is a paramount concern, and the plan makes proposals for this at major crossing points.
187	On Strand Street, critical intersections such as Lower Plein, Castle, and Adderley are widely used by pedestrians but lack protected signalised crossings, creating real danger and incentivising informal mid-block crossings . The current approach to signalisation — based on road classification rather than land use and pedestrian demand — is outdated and harmful in this mixed-use context. At Strand and Chiappini, for example, there are no pedestrian buttons at all, and at Adderley, signals are delayed and too short, despite the high volume of foot traffic.	Signalisation problem areas	Agreed. Pedestrian safety when crossing Strand Street is a particular concern. The plan proposes improvements to the Strand /Lower Plein st and the Strand/Adderley st intersections. A signalisation plan is also being prepared. Proposals forwarded to Urban Mobility Directorate.
188	The same concerns apply to Buitengracht Street , where the only signalised NMT crossing at Shortmarket Street can take up to 10 minutes to go green — a delay that is clearly unacceptable for a key crossing point used by schoolchildren, workers, and cyclists. This delay stems from synchronisation with nearby intersections like Strand/Buitengracht and Riebeek/Buitengracht, but it completely undermines the user experience. As it stands, this is the only dedicated crossing at Buitengracht— and the pedestrian bridge nearby is almost never used. The solution is not to build more bridges, but to design at-grade infrastructure that actually works, as called for in the plan itself (Annexure B, p. 15).	Signalisation problem areas	Agreed. Safe crossing of Buitengracht St is challenging due to the street’s function, but must be improved. This project will propose improvements to a number of pedestrian / cycling crossings into the CBD, including across Buitengracht St. Proposals forwarded to Urban Mobility Directorate.
189	On Buitengracht Street , the stretch between Strand and Wale Streets spans approximately 500 metres — the equivalent of at least six large city blocks — yet offers no safe, legal pedestrian crossings, despite the presence of a planted median and growing pedestrian demand. This section is flanked by increased mixed-use development, including recently approved residential buildings and the historic, high-density neighbourhood of Bo-Kaap, whose residents frequently need to cross this road on foot. The absence of any signalised crossings here creates a dangerous barrier that reinforces spatial inequality. The City must urgently investigate the introduction of a signalised, at-grade pedestrian crossing in this zone. We recommend the intersection with Shortmarket Street as a priority location — it is a logical mid-point in the block and already a key desire line for residents, workers, and school learners navigating between Bo-Kaap, the CBD, and public transport facilities.	Signalisation problem areas	Agreed. Safe crossing of Buitengracht St is challenging due to the street’s function, but must be improved. This project will propose improvements to a number of pedestrian / cycling crossings into the CBD, including across Buitengracht St. Proposals forwarded to Urban Mobility Directorate.

190		Shifting from high-mobility arterials to streets already designated for shared or active mobility use, we note serious shortcomings in the treatment of Shortmarket Street and Waterkant Street. On Shortmarket Street, what began as a bi-directional Class 2 cycling lane has degraded into a de facto one-way shared facility, due to enforcement of the National Road Traffic Act provision that cyclists must travel with vehicle traffic. In practice, however, both directions are heavily used — especially by commuters and delivery riders using e-bikes. The current design is unsafe and restrictive, and it cannot be the basis for scaling similar shared street models elsewhere in the CBD. Moreover, Shortmarket remains car-dominated, despite being a Class 5 street with a narrow, single-grade layout. Poor signage, lack of shared space education, and weak design cues allow vehicles to behave as if it's a regular road. If the City is serious about shared streets, more must be done — including clear signage, visual traffic calming, and better delineation of pedestrian and cycling priority.	Proposals for Shortmarket and Waterkant	Both Shortmarket and Upper Waterkant Streets are proposed to be reconfigured as shared streets, reducing traffic speeds and prioritising pedestrian and cyclist safety and access. Waterkant, although designed in this way, often functions in this manner.
191		The same applies to Waterkant Street, where design intentions are frequently undermined by illegal parking and the absence of enforcement. Like Shortmarket, it's a heavily used pedestrian corridor with real potential — but that potential remains unrealised without physical interventions to prevent vehicle abuse	Proposals for Waterkant	Agreed.
192		Across all these streets, we ask the City to urgently provide clarity on: • How pedestrian and NMT signalisation will be fast-tracked and standardised at key intersections like Strand/Lwr Plein, Strand/Adderley, and Buitengracht/Shortmarket. • How the City intends to accommodate two-way cycling on narrow shared streets like Shortmarket and Waterkant, particularly in the context of e-bike commuting and delivery work. • How design and enforcement will shift to ensure shared streets truly function as shared — not just in name, but in practice. • What near-term changes are planned on these existing streets to align them with the goals of the LSDF and Mobility Plan — not in five years, but now.	Requests for clarity re NMT and cycling upgrades.	Thank you for the proposals. It will be forwarded to the Urban Mobility Directorate for use during further project design for implementation and monitoring.
193	Young Urbanists	Transit Streets (e.g., Adderley Street, Darling Street) We strongly support the designation of Transit Streets that prioritise public transport, walking, and cycling while limiting or excluding private vehicle access. Streets like Adderley and Darling are natural candidates for this designation — they are key public transport corridors, active movement routes, and gateways into the inner city. However, we request further detail on the following: • Delivery and Emergency Access: The current plan references “delivery allowed” but lacks specificity. Clarity is needed on times of day, permitted vehicle types, and whether this will be physically regulated (Annexure B, p. 16). Emergency access protocols also need to be addressed explicitly. • Timeline for Physical Upgrades: While conceptual drawings are included, there is no public-facing timeline for when bus lanes, bollards, curb-less designs, and surface treatments will be implemented. We ask that this be made available for streets like Adderley and Darling, particularly in coordination with MyCiTi operations. • Role of MyCiTi and Informal Transport: These streets must accommodate both formal (MyCiTi, GABS) and informal (minibus taxis) modes. The final design must balance operational needs, stopping points, and safe, equitable access for all users — especially along Darling Street, which serves both the Golden Arrow and taxi ranks at the Grand Parade.	Proposals re Adderley and Darling	Thank you for the proposals. It will be forwarded to the Urban Mobility Directorate for use during further project design for implementation and monitoring.

194	Activity Streets (e.g., Bree Street, Long Street) We support the framing of Activity Streets as multi-functional spaces that support walking, cycling, trading, and cultural activity, with slow-speed vehicle access. Bree Street, in particular, has been a focus of our advocacy and programming. We recommend the following: ● Formalised Shared-Space Design: Design should move beyond ad hoc tactical interventions. Clear demarcation of pedestrian zones, smooth surface transitions, and bollard placement can improve safety while preserving flexibility for shared use. ● Small Business-Friendly Interventions: Activity Streets must cater to informal and formal economic uses. That includes built-in seating, loading bays, and support for seasonal or pop-up events that activate the street. The Mobility Plan speaks of economic vibrancy (Annexure B, p. 6), and that needs to translate into design details. ● Public Timeline for Pedestrianisation Works on Bree: While the Plan references Bree's future pedestrianisation (Annexure A project #024), there is no public timeline. Given how long temporary infrastructure has been in place, we urge the City to publish an update on project milestones, phasing, and budget.	Proposals re Bree and Long street	Noted with agreement. Proposals will be forwarded to Urban Mobility Directorate for use during further project design for implementation.
195	Shared Streets (e.g., Bloem Street, Longmarket Street) The concept of Shared Streets is welcomed, but only if implemented in a way that truly prioritises people walking and cycling. Without this, the term risks being nominal. We recommend: ● Clear Surface Treatments: Changes in paving texture and colour help communicate the shift in priority, especially where curbs are removed. This is currently lacking on streets like Bloem, which are still visually dominated by vehicle cues. ● Design to Prevent Vehicle Dominance: Bollards, planters, and street furniture should be strategically used to reinforce pedestrian priority. This is especially important on narrow streets where vehicles currently park informally or speed through.	Proposals re Bloem and Longmarket	Noted with agreement. Proposals will be forwarded to Urban Mobility Directorate for use during further project design for implementation.
196	Walking Streets (e.g., St George's Mall, Old Marine Drive) We strongly support the expansion and deepening of Walking Streets — spaces where walking and cycling are the only permitted modes and public life is prioritised. St George's Mall has long functioned as a linear civic spine, and its treatment here is encouraging. We ask the City to provide more visibility on: ● Street Trading Zones: Trading should not be treated as a conflict but as a key function of walking streets. Design and licensing must be integrated, not siloed. ● Universal Accessibility: Designs should prioritise users with disabilities, including continuous even surfaces, tactile paving, and frequent rest areas. ● Stormwater and Canopy Improvements: The Plan gestures toward greening and SUDS (Annexure B, p. 20), but more detail is needed on tree canopy targets, shade coverage, and climate resilience — particularly for hardscaped areas like St George's Mall. ● St Georges Mall needs to be made at one grade level, especially when roads goes through it like Shortmarket, Longmarket St, Church, etc. Even Strand St should be considered as it is a class 4 road and also given the land-use/the amount of pedestrians frequenting it. ● We support all recommendations.	Proposals re St George's and Old Marine	Noted with agreement. Proposals will be forwarded to Urban Mobility Directorate for use during further project design for implementation.

197	Making These Typologies Work: Implementation, Standards, and Transparency While the street typologies offer a solid conceptual framework, their success will depend on how the City delivers them. Right now, too many upgrades happen piecemeal or rely on private developers to “fill in” public infrastructure — often with inconsistent results. We recommend: ● Learn from street experiments like the Bree Street Pilot*, where protected NMT space, delineator kerbs, and flexible loading bays have already been tested with City oversight. These types of modular upgrades should be used to trial Transit and Activity Streets citywide before large-scale capital works. ● Fix signalisation citywide, especially in high-NMT corridors, where pedestrians still wait up to 10 minutes to cross at legal crossings (e.g., Buitengracht/Shortmarket). Signal priority must be based on surrounding land use and pedestrian volumes, not just traffic engineering standards. ● Expand non-signalised crossings, such as zebras on Class 5 and 4 streets, where traffic speeds and context allow — particularly near schools, housing, and public transport nodes. ● Align LUMS and development approvals with these typologies. Future buildings must contribute to street upgrades — including universal access compliance, sidewalk width, and public realm interface. As seen recently in Sea Point, new developments can still produce inaccessible, poorly integrated public edges if these requirements aren't enforced. ● Be transparent with budgets and timelines. The City should publish and maintain a public-facing tracker for street upgrades — showing which streets are funded, when work will begin, and how to engage.	Furthering implementation and reporting	Noted with agreement. Proposals will be forwarded to Urban Mobility Directorate for use during further project design for implementation.
198	As Young Urbanists NPC and the Active Mobility Forum, we are drawing on lessons from our pilot projects (including the Bree Street upgrades), inputs from the City Bowl Programme and Forum workshops, insights from informal workers like delivery riders, and feedback from the wider public. From this, we are linking a set of mapped proposals covering the following areas:	Proposals from existing pilots to be expanded	Thanks you for the proposals below - forwarded to more appropriate directorate.
199	Critical Pedestrian Crossing Points Map here. https://www.google.com/maps/d/u/0/edit?mid=1-pxZoy4belddJoosa-k7LhJR90AARjg&ll=-33.9437493303287%2C18.4282123000000002&z=12 How: They should be done even before each respective road upgrade according to its new class. What: There are multiple high-demand pedestrian crossing zones across the CBD where no safe, legal pedestrian facilities exist — creating daily confl ict between people on foot and fast-moving traffi c. For example, Buitengracht Street between Strand and Wale spans over 500 metres with no formal crossings, despite being fl anked by new residential developments and the historic Bo-Kaap, whose residents regularly cross here on foot. We recommend that a signalised, at-grade crossing be installed at Shortmarket Street, where strong pedestrian desire lines already exist.Other key sites needing signalised crossings include: ● Castle and Strand Street ● Lower Plein and Strand Street ● Midblock segments between Adderley Street, the Grand Parade, and the Transport Interchange. In addition, the City must prioritise a series of non-signalised (zebra) crossings at lower-order intersections — particularly on streets with slower speeds and Class 3 to 5 designations. These should not wait for broader upgrades or lengthy planning processes. They are low-cost, quick to implement, and essential for improving walkability and safety now. There is no reason why these cannot be installed within the next 6–12 months. The sites included in our map submission have been identi fi ed through observation, public feedback, and regular walking audits, and represent an easy win for the City to show visible delivery of the LSDF's goals.	Critical pedestrian intersections highlighted with proposals for singalisation and non-singalised interventions.	Proposals were forwarded to the Urban Mobility Directorate more closely involved in intersection management, signalising, etc. Please engage the Urban Mobility Directorate on pilot projects via existing MOUs.

200	Missing Protected Pedestrian Crossings at Intersections Map here. https://www.google.com/maps/d/u/0/edit?mid=1yyV1_jBayz-3L0Ft6F-AECglzU0hvQE&ll=-34.004757017510045%2C18.45115745000001&z=10 How: Enforce the existing internal policy from Network and Transportation Planning and ensure the land-use/context informs the decision, not class of the road. What: Many key intersections in the CBD either lack protected pedestrian signalisation altogether or have signals that are poorly timed, with long wait periods and green phases too short to accommodate actual pedestrian movement. These failures are especially critical in a high-footfall, mixed-use environment like the CBD, where people are not only moving between transit and work but also navigating with strollers, mobility aids, or in groups. These are not just design gaps — they are policy implementation failures. The City's own internal guidance from Network and Transportation Planning already supports signalisation that reflects surrounding land use and pedestrian demand, not just the technical class of the road. We call on the City to enforce this policy consistently across the CBD. Intersections near residential buildings, schools, public transport nodes, or civic facilities should default to protected, user-activated pedestrian phases — with reasonable waiting times and safe clearance periods. These changes can and should be made independent of major upgrades. They require minimal capital investment and are among the most effective, immediate tools available to improve safety and accessibility. Signalised crossings must work for all users — not just cars.	Critical pedestrian intersections highlighted with proposals for singalisation and non-singalised interventions.	A CBD Signalisation Plan is intended to address these and other concerns and proposals were forwarded. Please engage the Urban Mobility Directorate on pilot projects via existing MOUs.
201	Motorcycle Bays (and more) for Last-Mile Delivery Workers Map: here. https://www.google.com/maps/d/viewer?mid=1NmtPQihVrVZZeHsN88UmthagX2ogjqA&ll=-33.94480821685159%2C18.672660700000012&z=9 How: Through PPP like the Safe Mobility Hub or through better network planning and changes by Urban Mobility. What: The City's LSDF and Mobility Plan currently overlook the specific spatial and operational needs of last-mile logistics workers, particularly those using motorcycles and e-bikes. These workers — many of whom operate informally — are a daily presence on CBD streets and deserve infrastructure that recognises their role in the urban economy. Through our pilots on Mill Street and Strand Street, we have begun testing designated, protected motorcycle delivery bays. As part of this submission, we are providing a linked map that identifies: ◦ Existing sites we've already implemented or upgraded (highlighted as green) ◦ Future sites currently being planned or designed (highlighted as orange) ◦ Additional areas we've highlighted based on rider input, safety needs, and commercial clustering (highlighted as red) These spaces must be integrated near bike lanes, shared streets, loading zones, and commercial frontages, and supported by formalised rollout guidance. From our current interventions, we have already observed that more well-designed bays are urgently needed — with proper protection, spacing, and visibility. In addition, riders need rest infrastructure: public seating, shade, and ideally, access to a small base space in the CBD. These are not luxuries — they are essential components of basic dignity, safety, and functionality. We are willing to continue applying for, upgrading, and managing these spaces — but we ask that Network and Transportation Planning simplify and support the application process, and that the City help us identify and unlock a low- or no-cost structure or parcel of land to serve as a shared rider base. This is a critical opportunity to include one of the most under-recognised transport user groups in the shaping of a more inclusive city centre.	Parking bays for last mile delivery workers.	Proposals were forwarded to the Urban Mobility Directorate more closely involved in these kinds of operational initiatives. A next step of the MAP project is a detailed CBD Parking Plan, which will explore the parking needs, and potential options to meet those needs, in the CBD. This includes parking for delivery vehicles of all sizes.

202	Sustainable Urban Drainage Systems (SUDS) or rain gardens Map: here https://www.google.com/maps/d/u/0/viewer?mid=18s6dmkp7dHOcNhs7a8fEUQ5RmKdNsqw&ll=-33.9244196%2C18.421829499999983&z=17 - note we have only added one location, we need to add more How: Update the Guidelines for Roads and Stormwater and do a pilot in the CBD before 2026. Even if it means to collaborate with us or anyone in the private sector. What: All streets that prioritise non-motorised transport (NMT) should be designed with integrated green infrastructure — including bioswales, tree pits, permeable paving, and rain gardens — as standard elements. These interventions not only manage stormwater more effectively but improve walkability, comfort, and climate resilience in dense urban areas. While the City's Green Infrastructure Programme provides a strong policy direction, it now needs to move into implementation, particularly by aligning with the new street typologies and upgrades identified in the LSDF and Mobility Plan. The recently updated Standards and Guidelines for Roads and Stormwater makes external reference to SUDS, but still defaults to conventional grey infrastructure in the treatment of road space. This is a missed opportunity. To align engineering standards with spatial and mobility goals, the City must formally update this document to include SUDS as a preferred approach within road and sidewalk design — especially for NMT corridors and pedestrian-priority streets. This update should clarify where and how SUDS can be applied, define performance criteria, and give City engineers, planners, and developers a shared implementation framework.	Rain garden guidelines to be included in standards and guidelines for roads and stormwater.	Proposals were forwarded to the Urban Mobility Directorate more closely involved in these kinds of design guidelines.
203	We strongly support the LSDF and Mobility Plan's commitment to connected, dedicated cycling infrastructure as a core part of Cape Town's transport future. However, while the intention is clear, successful implementation will require the City to prioritise fixing and connecting the existing network first. There are several painted lanes and cycle routes throughout the CBD that were clearly designed by teams that never cycled them — with lanes that disappear 200 metres before major intersections, drop into conflict zones, or end in dead space. We urge the City to ride its own infrastructure during design and review phases, to test continuity, comfort, and safety from the user's point of view. This simple step would expose the logic gaps that remain baked into much of the legacy infrastructure. In addition, we recommend the City study and replicate elements of the Safe Passage Programme, public-private partnership (PPP) model. Through this programme — delivered in partnership between Young Urbanists, SDI Trust, and Urban Mobility at the CoCT — we are currently upgrading the Bree Street cycle lane using low-cost, modular interventions. These include: • A removable concrete kerb system to physically separate cyclists from cars • Safe hit bollards for flexible protection • Quick installation, cost efficiency, and materials that are good for maintenance.	MAP project supported and certain projects already in implementation or experimentation phase.	Noted and proposals will be forwarded to the line department involved in detailed cycling projects. Thank you for your initiative and partnership in the CBD,

204	Young Urbanists	This is not a vision — it's being built in the coming weeks. The City should consider this approach as a template for scaling protected cycling lanes affordably and fast, especially in areas awaiting full capital upgrades. We also flag two areas needing immediate improvement: ● Cycling Signalisation: Starting with Bree Street, cycling-specific signals and clear crossing times should be introduced at major intersections. Current gaps — where cyclists must guess or merge unpredictably into vehicle flows — are unsafe and unacceptable, particularly on commuter corridors. ● More secure, visible bike parking is urgently needed across the CBD. These facilities should be co-located with MyCiTi stops, trading zones, civic precincts, and major employment nodes. This is especially important for people using bicycles and e-bikes for work, errands, and delivery, who currently have few safe or formal options for short- or long-term parking. ● The City must also begin to treat e-bikes as a distinct class of commuter and delivery vehicle — especially in the context of growing last-mile logistics. Just as motorcycles are allowed designated on-road parking bays, e-bikes should be granted the same treatment. This would create safer, more efficient parking zones and reduce the current problem of illegal or obstructive e-bike parking — which is already visible outside fast-food outlets such as McDonald's on Strand Street and other busy corridors. ● This approach must be scaled strategically alongside the rollout of shared and protected cycling lanes. By legitimising and supporting e-bike parking now, the City can prevent future enforcement headaches and help normalise low-emission, space-efficient transport in the heart of the city. ● Note: we support Government Avenue being a cycling route.	Wide range of cycling proposals.	Noted and proposals will be forwarded to the line department involved in detailed cycling projects. Thank you for your initiative and partnership in the CBD,
205		Need for a City-Led Bicycle Sharing Scheme. Previous attempts to introduce bike-sharing through tender-based models have failed to deliver, primarily due to high operational costs, unclear user demand frameworks, and lack of infrastructure integration. In light of the growing focus on last-mile mobility, the expansion of safe cycling routes, and the increasing adoption of e-bikes (especially by delivery riders and working-class commuters), a City-supported bicycle sharing scheme is not only viable — it's necessary. We recommend the following: ● The City should establish a licensing framework for companies to apply for licences within a clear framework. A bicycle sharing system is a public transport tool, not just a novelty. If Cape Town is serious about cycling as a mode of transport and supporting public transportation like MyCiTi — not just recreation — then it must be prepared to act as an enabler.	Practical proposals on bicycle schemes	Noted. Licencing for e-bikes and bike share schemes fall outside the scope of the LSDF and the MAP project.
206		We support the LSDF and Mobility Plan's inclusion of park-and-ride facilities as part of a broader strategy to reduce private car circulation in the CBD and enable a more people-focused urban core. Locating structured parking at the periphery of the city, linked to high-mobility corridors, is the right direction — and if implemented well, this strategy can free up central space for walking, cycling, housing, and public life. However, intent alone is not enough. Cape Town cannot afford another ten-year planning cycle before one of these projects breaks ground. We call for the City to: ● Commit to a timeline for delivering the next park-and-ride facility, including feasibility, funding, and integration with MyCiTi and NMT networks. ● Clearly identify and prioritise the next park-and-ride site — ideally near the Foreshore, Christiaan Barnard corridor, or lower Buitengracht — with interim delivery possible through modular or adaptive use of existing land or buildings. ● Ensure that all new park-and-ride facilities are designed for multi-use, with co-located retail, NMT infrastructure, and public amenities — not just structured car storage. ● Begin de-incentivising inner-city parking provision through pricing, regulation, and support for developers who opt into off-site or shared parking models.	Support for MAP project aiming at reduction of private car use in the CBD.	Noted. It is anticipated that the private sector, and not the City, would provide such facilities on the periphery of the CBD, particularly where they already own parking facilities there. The Parking Policy (2020) already allows for, and encourages, this.

207	We strongly support the LSDF's recognition that housing affordability is central to the future of Cape Town's CBD. These are necessary foundations — but the real test is in delivery. Cape Town has not built a single affordable housing unit in the inner city since 1994. We therefore call on the City to take the following actions: ● Fast-track the implementation of inclusionary housing overlays in high-value precincts such as the East City, Loop Street, and the Foreshore. These overlays must be tied to real delivery thresholds and enforceable conditions — not offered as soft incentives. ● Align transport and housing planning, so that well-located affordable homes are tied directly to walkability, MyCiTi stations, and rail hubs. This will not only cut household transport costs, but support the long-term sustainability of the public transport system itself. ● Reform the development pipeline to prioritise housing projects that meet affordability and universal access targets. Social housing institutions and non-profit developers must be supported through land release, predictable approvals, and capital partnerships. ● End the default prioritisation of off-street parking in land use decisions. Surface lots and underutilised garages take up vast amounts of space that could support well-located housing. The City should begin phasing out unnecessary parking in favour of development — and existing underused parking facilities must be evaluated for repurposing or redevelopment. ● Introduce municipal design guidelines for liveable apartment homes, suitable for families, couples, and shared households. The current development environment encourages units that maximise yield, not long-term livability. Cape Town needs an updated design framework that supports good layouts, cross-ventilation, access to outdoor space, and social infrastructure — particularly if it wants density to be dignified. ● Regulate short-term rentals: Any home used for short-term letting full-time must be classified and rated as a business, and those revenues reinvested in housing programmes. ● Treat transitional housing as a vital part of the housing pipeline. Safe Spaces must evolve into more permanent, service-integrated transitional housing — including lockable rooms, family units, and on-site support services. This will provide a bridge between shelters and permanent homes and must be scaled in partnership with NGOs, CBOs, and the Province.	Supporting residential intensification but also for affordable segment of market.	The CBD Overlay Zone Review is in process and will conclude in 2026/27 after its own public participation process which will be subject to the Affordable Housing policy process (also ongoing). Some of the proposals will be forwarded to the Affordable Housing Policy (under development). The MAP Project and the Implementation Plan refers to a separate Parking Plan which is under development.
208	Prime pieces of well-located land — including the Parliament Parking Lot, Top Yard, and the two Government Garage sites on Hope Street — are currently used to store government vehicles. These sites sit across the road from schools, transport interchanges, and hospitals, yet are blocked from use by the people who need land the most. These four lots represent over 16 hectares of high-value land — space that could house thousands, but is instead used for cars. We support and endorse the proposal to transform these state-owned parking sites into a mixed-use, inclusive precinct, providing: ● 969 social housing units ● 969 market-related apartments ● Transitional housing for 732 individuals ● Public space, retail, and informal trading opportunities ● Consolidated parking in a multi-storey facility for parliamentary needs	Redevelopment of underutilised government land is essential. Support redevelopment for social and market housing, public space and other mixed land uses.	The LSDF has a specific table, and associated maps in Chapter 6 dealing with all government land and its intended future use.
209	This proposal is not theoretical https://youngurbanists.substack.com/p/housing-parking-and-elections-24 — it includes architectural drawings, financial models, and implementation phasing. The R73 million facility built in Maitland in 2014 to relocate these cars is still underutilised. The Province must follow through and rationalise its land holdings so that this public land can serve the public. It is important that the LSDF speaks to this.		The LSDF has a specific table, and associated maps in Chapter 6 dealing with all government land and its intended future use.

210	We support the Urban Design elements outlined in the LSDF and the City's revised Urban Design Policy (2024). However, we remain concerned that, as currently written, the Urban Design Policy lacks the regulatory teeth to ensure meaningful change. Urban design must move beyond "considerations" and become enforceable criteria within the development assessment process. As noted in our formal submission on the revised Urban Design Policy (October 2023, Annexure D), urban design principles must: ● Be integrated into LUMS and the DMS, not sit adjacent as optional guidelines. ● Include clear triggers, checklists, and toolkits for developers and officials to follow, with spatially contextual responses (what applies where, and why). ● Be supported by visual examples, simplified language, and mapping, so that developers, officials, and communities can engage equally with design decisions.	Support for urban design focus of the LSDF. Although lacks regulatory component.	The MPB-L and the Development Management Scheme is the only sources of enforceable conditions on development. A LSDF does not give or take away rights but it sets a vision and highlight strategy changes which can be expected in the DMS and the design guidelines. This LSDF is already much more graphic than any other LSDF and contains mapping, illustrations and conceptual diagrams to communicate the vision and direction of anticipated design decisions.
211	Finally, the City's own projects must model this shift. Every state-led or state-supported development — including the repurposing of public land — must adhere to the Urban Design Policy, and not be granted exemptions on budget or procurement grounds. Urban design is the difference between density and dignity. It must become the connective tissue across mobility, housing, climate, and economic goals.	Model the vision	The LSDF is accompanied with a 3D model which illustrates the future design vision in 3D. The Overlay Zone Review process (as referenced in the LSDF) has commenced and will be completed around 2026/27 providing an updated regulatory environment.
212	The LSDF and Mobility Plan lay out bold visions, but without clear implementation pathways and public accountability, those visions risk stalling. We recommend that the City create a single, consolidated public webpage dedicated to the LSDF and related Mobility Plan upgrades. This page should include: ● Timelines for each corridor or street upgrade ● Maps and design visualisations (including typical cross-sections) Status updates per project (e.g., in design, funded, under construction) FAQs for local businesses, residents, and commuters We also request that the City commit to quarterly updates, published via this platform or a basic dashboard	MAP project needs implementation plan	MAP project will have its own detailed reporting, implementation programme with detailed project designs and associated budgets. This will be taken through a public participation separate from the LSDF. Initiatives will have to be a collaboration between public and private sectors and will run over a long period of time.
213	This LSDF presents a once-in-a-generation opportunity to reshape the centre of Cape Town around the principles of equity, access, and climate resilience. We commend the City for recognising the historic and ongoing injustice embedded in how land, streets, and housing have been distributed — and for outlining tools to begin correcting this.	Complements to the process	Noted
214	Pedestrianisation, while powerful, is not always the solution in and of itself. Without complementary activation strategies, pedestrianised areas can underperform — or even have unintended consequences for accessibility, safety, and economic vitality. Key Risks of Poorly Planned Pedestrianisation: ● Impact on Businesses: Vehicle restrictions can limit delivery access and reduce spontaneous visits, especially for businesses not located near transport nodes. ● Reduced Accessibility: Pedestrianised zones can unintentionally marginalise older adults, people with disabilities, and others who rely on vehicular access. ● Night-time Safety: Removing traffic may reduce passive surveillance ("eyes on the street"), increasing safety risks after hours. ● Congestion Elsewhere: Over-emphasis on pedestrianisation, without transport integration, can shift congestion to adjacent routes. Underuse and Decay: Without reasons to linger — such as seating, events, or commercial activity — these streets risk becoming inactive and unattractive. Why Activation Matters: ● Place-Making: Activation transforms a space into a destination — not just a corridor to pass through. ● Support for Local Economies: Market stalls, pop-ups, and events drive foot traffic and local spending. ● Community Cohesion: Programming fosters public life, belonging, and inclusive civic identity. ● Safety and Comfort: Lighting, greenery, and staff presence improve user experience and perception of safety. ● Universal Accessibility: Activation includes spatial features — benches, ramps, tactile paving — that enhance access for everyone.	Pedestrianisation will depend on activation strategies, pedestrianised areas.	Noted with agreement. It is not intended that any delivery access or disabled parking would be decreased. Consideration of these risks and proposals will be more appropriate when projects from the MAP Project is in detailed design and implementation stage.

215		We urge the City to treat pedestrianisation not as an end goal, but as a platform for place-making. Streets like St George’s Mall should be planned, maintained, and programmed with activation and inclusion in mind — ensuring they are lively, safe, economically supportive, and accessible to all.	St Geroges should be planned, maintained and programmed with activation.	Agree. LSDF only provides a framework for property owners' initiatives and implementation partners working in the activation space.
216	Phano Liphoto	I would like to commend the City of Cape Town on the significant improvements reflected in the draft Local Spatial Development Framework for the city centre. The incorporation of affordable housing, the pedestrianisation of various streets around the CBD, and the proposed transit streets represent progressive steps towards a more inclusive, accessible, and liveable urban environment.	Support affordable housing, pedestrianisation	Noted
217		I understand that Strand Street is a mobility spine and has been officially recognised as one on the LSDF, however, there is a real safety threat along strands at the metrorail, bus and minibus taxi station section. I urge the City to improve the section of Strand Street outside the minibus taxi deck, bus and train station pedestrians must be the priority throughout that section of road. This area sees a high volume of pedestrian movement daily, particularly those crossing the street to use the pedestrian bridges leading to the station deck and the Golden Acre Mall. Enhanced safety measures, better surface treatment, and improved pedestrian priority in this critical node would significantly improve the commuting experience and urban functionality. Other streets include: - Lower Long car park to V&A. The streets are not walkable and crossing - Buitengracht, between Wale and Strand needs a pedestrian crossing (Riebeek Square) - Pedestrianise Parliament Street between Darling and Spin.	Strant Street and other priority street problems	Noted with agreement. Strand Street is a priority for pedestrian improvements, including safer crossings.
218		Additionally, I urge the City to implement stronger regulation and taxation on Airbnb and other short term leasing platforms. These should be structured to contribute meaningfully to affordable housing goals. All high density residential developments should be required to include a fair portion of affordable housing. To improve affordability, there are existing developments that should be duplicated. The Pinelands Conradie Park Better Living Model (housing for people earning below 22,000p/m) should be implemented in all future affordable housing developments closer to the CBD.	Affordable housing in CBD should be on WCG land	Noted, although some locations are outside the study area
219		Additionally, I urge the City to implement stronger regulation and taxation on Airbnb and other short term leasing platforms. These should be structured to contribute meaningfully to affordable housing goals. All high density residential developments should be required to include a fair portion of affordable housing. To improve affordability, there are existing developments that should be duplicated. The Pinelands Conradie Park Better Living Model (housing for people earning below 22,000p/m) should be implemented in all future affordable housing developments closer to the CBD.	Air BnB	Noting proposals for taxation and control. City is investigating this in association with National Ministries
220		Our overall assessment of the Draft LSDF is that the vision, strategic goals and objectives, and related proposals are mostly relevant, appropriate and achievable. Moreover, the policy largely speaks to the specific opportunities and challenges of the area, the needs of citizens across precincts, and the vital contribution the CBD as the economic hub of the city makes to its growth and development. Where we have identified shortcomings or opportunities for enhancements, we reflect on those in the following sections.	Support for the document overall	Noted
221				
222		Inclusivity, Affordability, and Long-Term Vision for the CBD - In our earlier submission we urged the City to consider a long-term perspective (50 to 100 years) in their visioning of the CBD, while planning for the immediate term (up to 25 years). We still believe that such an approach would significantly enhance the current LSDF and related planning and implementation proposals. While we recognise that it may not be possible to extend the planning timeframes at this stage of the process, we do urge the City to articulate their extended spatial vision for the city, and how the Draft LSDF is aligned with those long-term planning horizons.	Long term vision vs LSDF vision	The CBD Long term vision is reflected in the part referring to the Land Use Model (the 25 vision for the metro as a whole). The LSFD has a lifespan of maybe 10 years. The proposals in the LSDF is ambitious and will definitely take much longer than 10 years to implement and will require constant update. So the Implementation plan has timelines and reflect, like the vision a longer term perspective.

223	The City indicates that their residential growth forecast is based on several information sources and forecasting models, primarily the City's 2040 land use model (LUM 2020) and the post-COVID pandemic 2023 contextual review for this LSDF.² The latter reflects a 15-year forecasted period, up until 2040, with residential growth estimates for the CBD at 19 120 residential units, bringing the 2040 end state to 28 952 units. These numbers are concerning. It is not entirely clear what additional measures the City will take to ensure that the supply of affordable housing is accelerated to the extent that, at the very least for the forecasted period, it becomes equal to supply. It is therefore essential that the City urgently investigate how it can encourage or compel developers to build affordable, appropriately sized residential units in the CBD. Additionally, we recommend that the City investigate and urgently implement measures to regulate short-term rentals in Cape Town (as many other cities around the world have elected to do).	Affordable housing	Affordable housing text may have to be improved with reference to the review of the Overlay Zone which will include a component for affordable housing as part of the public good.
224	A further concern is around the length of "long-term" planning for the CBD, which as indicated above, equates to about a decade and a half. We contend that a strategic and sustainable long-term vision and therefore spatial plan, in a metropolis' urban core, should extend far beyond this timeframe. The LSDF provides insight into the City's spatial and development plans for the next five years. However, the decisions and actions taken at this moment will have far-reaching and long-term implications for the future of the CBD. Given the strategic nature of the CBD, to extent to which the City complemented the LSDF with a longer-term perspective that reflects how they see the metro, but specifically the CBD, developing over the next 50 to 100 years, is crucial.	Vision length	The LSDF reports into the DSDF and the MSDF, both of which have >20 year vision. The Land Use Model is at least 25 years. It is not feasible to plan too prescriptively for a period of 100 years considering the availability of all government budgets being 3 years, capital planning for 0-10 years and bond payments 20-30 years. Everything >10 years are scenario based only.
225	We are specifically worried by the unclear articulation of the City's plan to accommodate people who face specific vulnerabilities, like homeless people or the 'urban poor'³ as expressed in the LSDF. The City rightly acknowledges that notwithstanding the development of 2-3 safe spaces over recent years, there is a need to provide additional safe spaces to accommodate this group in the immediate future. However, beyond this acknowledgment the City does not give much clarity on its plans and proposals to develop more safe spaces or transitional housing, even if only done once it has updated its modelling from 2040 to 2050, and having taken into consideration revised anticipated residential growth patterns (between 2025 and 2035).⁴ Moreover, in terms of their role as a provider (state-led) of affordable housing the City appears to limit themselves to the First Home Finance programme,⁵ thereby excluding state-led provision to homeless persons who are clearly unable to meet their own needs and for whom few others have incentive to deliver. We therefore recommend that the Draft LSDF clearly articulate the City's approach and specific plans for the construction and development of new safe spaces and transitional housing.	Focus on homeless project is inadequate	No plans exists from the line department re homelessness and further new safe spaces or transitional housing. State-led affordable housing stipulations will be forthcoming in the Overlay Zone review which will follow the LSDF process. Some principles were already laid down in the Public Good part of the document.
226	We must confirm our support for the proposed public good-incentives framework, and its underpinning goal to ensure that the public benefit is maximised where developers are able to access certain 'enhanced rights'. Similarly, we support the review of the existing CBD overlay zone to increase the public benefit. Within the context of a diminishing fiscus and increasing demand, the suit of land value capture (LVC) mechanisms and tools available to capture as much value created through public investments as possible, is paramount.	Agree with public good incentive framework	Noted

227	Querida Saal DAG	However, a key concern, pertains to uncertainty created by the City Heritage Protection Overlay Zone (HPOZ), the review of the current overly zone and/or introduction of spatially targeted (Inclusionary Housing) overlay zone/s. Given the pre-eminence afforded to the HPOZ as a legal instrument ¹⁰ guiding the city form, we strongly recommend that a legal review of the implications of existing and proposed new zoning tools/zoning laws be conducted, and that the LSDF reflects this intention. We urge the City to put the necessary mechanisms in place to ensure that they minimise an over-reliance on a case-by-case approach to decision-making and negotiations with developers and that the set of incentives offered would be stacked in such way that the City can gain the deepest down reach, meaning to households at even the lowest end of the income/affordability range. We have noted the City's 'incentivisation concept' ¹¹ and further reiterate the point that the City must ensure that the value created for the landowner/developer does not exceed the value that can be captured by the City.	Concerns re HPOZ, need to get a review of HPOZ	The HPOZ and the affordability housing component will be reviewed as part of the overlay zone review.
228		More specific to the overlay zones (whether an Inclusionary Housing Overlay Zone or Additional Use Rights attached to spatially targeted zones), we strongly recommend that the CoCT makes the provision of the public good mandatory rather than voluntary. The Draft LSDF states that it is "taking a spatially targeted and voluntary opt-in approach to inclusionary housing" and that "the work on the reviews of the CBD Overlay zones, which has started in parallel to the LSDF, will include inclusionary housing requirements". ¹² We contend that the additional floor space (Floor Area Ratio (FAR)) and in fact, other incentives, may not be enough to draw to developers to the CBD when they have to provide a public good in return. Given the size of the CBD and height restrictions, we believe that developers will not be easily swayed by more floor space as a gain to justify the requirement to deliver a public good. In the interest of spatial equality and greater inclusion, we therefore urge the City to make this requirement mandatory, thereby ensuring that value capture goals and public benefit objectives are indeed maximised.	Affordable housing should be mandatory	Noted
229		A comprehensive land value capture approach will incentivise both on-site and in-lieu fee delivery of a public good. We reaffirm our recommendation that the City includes the option of an in-lieu fee payment – especially because some developers may perceive the proposed contributions ¹³ (specifically affordable housing) as a disincentive for investment, or a basis for opposition and further negotiation. The value created via the additional Floor Area Ratio (FAR) would therefore be captured by the developer making an "in kind" or cash contribution to support the delivery of affordable housing (public benefits). Developers would then have both options – 20 or 30% affordable housing on site and the ability to support affordable housing in other less strategic but preferable also well-located areas within the city – available. Having both options available would allow the City to determine the cost-benefit of both options, using this analysis to maximise the public benefit. Also, given that the fees in lieu payment have to be diverted to projects within the vicinity of the relevant development/project, the City would still be able to satisfy their spatial justice and change objectives, i.e. if the money was diverted to Woodstock which is close but more family friendly.	Affordable housing policy matters	The Affordable Housing policy will be separated from the CBD LSDF and principles first have to be incorporated and approved there before it can be applied in the CBD. Reference will be made to declare this position.

230	While we commend the City's stated land value capture approach, we want to emphasise that all mechanisms and tools used/proposed must be such that they facilitate absolute efficiency and clarity in how the value created by these mechanisms and tools would be captured. For this reason, we strongly recommend the use of a residual value calculator as an instrument useful to achieve this objective. The residual value calculator would enable the City to determine the value gain/created, and based on that, what the contributions ought to be from the developers. This analysis/calculation would then be factored into the cost of land again, ensuring that the disposal of public land yields the maximum public benefit. Significant value is created by the public sector (also through infrastructure and other projects) in the well-located and strategic CBD and it is vital that the City is proactive in creating ways in which they can capture this value. Through our land value capture programme, we developed a residual value calculator as a key component of a feasibility study which is mandatory in each project/development. The detail of the instrument is encapsulated in our publication: Inclusionary Housing Practice Note. The Key Considerations for Initialising an Inclusionary Housing Policy and Feasibility Study. We are more than willing to engage the City on the calculator and to explore how best it can be inculcated in the current zoning/spatial planning framework.	Land Value Capture Calculator	Noted
231	Converting and redeveloping business offices is set to be a key response driving the CBD property market, for the foreseeable future. However, whether these "new" housing options would be affordable for the majority of those in need of housing is not at all clear.	Affordability questioned	Noted
232	Availing public land to a developer on long-term lease (as opposed to selling it off and extracting the short term once-off benefit) would enable to City, as the landowner, to set affordability conditions and requirements and to exercise much closer oversight so that these conditions are consistently met over the long term. This is but one of a number of accountability mechanisms that the City can explore and implement.	Principles on government land availability to be clarified	Noted
233	As exclusionary as the CBD currently is and given exceptionally high property price increases in recent years, and the high demand for short-term rentals – whether driven by the tourist industry or by 'digital nomads' who can afford significantly high rentals – ensuring that available and new affordable housing stock remains so to accommodate the average citizen is crucial. It is also essential that the City does not allow developers to jeopardise the size of affordable units in an attempt to drive down the costs of residential developments. As mentioned, a large amount of the residential units developed in the CBD and surrounds are small in size and, therefore, unsuitable for families. We therefore reiterate that the City urgently investigate how it can encourage or compel developers to build affordable, appropriately sized residential units in the CBD. We also recommend that the City investigate and urgently implement measures to regulate short-term rentals in Cape Town.	Size of affordable units have to be addressed in the affordable housing policy. Council urged to regulate short term rentals.	Noted re Affordable Housing Policy but the issues cannot be fully implemented in the LSDF if not settled in a Council approved Affordable Housing Policy first. Short term rental regulations under investigations.
234	Cape Town's incomplete Foreshore Freeway viaducts currently serve as costly urban dead-space. Finishing the freeway would require ± R 1.8 billion, locking the CBD into further car dependency, while demolition provides no long-term social dividend. The Foreshore Green Spine repurposes the existing structure into a linear park, solar energy spine, and mixed-use mobility corridor at one-fifth of the cost, delivering inclusive housing, climate mitigation, and economic activation for local SMMEs.	Support for Foreshore Green spine project referenced	Noted view the viaduct construction will turn city into a car dominated city

235		Proposed Solution – Foreshore Green Spine Key design layers: • Bridge the 260 m gap with a lightweight steel truss to carry pedestrians, cyclists, and micromobility. • Create an 8-10 m wide water-wise linear park showcasing indigenous fynbos, with universal access ramps. • Install a ± 2 MW rooftop solar canopy powering deck lighting and exporting surplus to the municipal grid. • Activate under-deck space with modular kiosks, maker pods, secure bike parking, and an e-cargo micro-hub. • Release adjacent air-rights for mixed-income housing (30 % inclusionary) to cross-subsidise construction	Content of Foreshore Green Spine project proposal	The Foreshore Freeway Precinct feasibility and scoping study is underway to generate a high level understanding of the feasibility re a mobility and development solution for the foreshore. Public participation processes will follow at which the FGS proposals can be proposed again. Suggestions are noted here but details will be discussed in a separate process.
236		**Formal Request:** That the City of Cape Town integrate the Foreshore Green Spine into the Foreshore Freeway Scoping Study & CBD LSDF, allocate R 15 million for detailed design, and mandate an Urban Mobility / Spatial Planning joint task-team to progress a public-private development agreement by Q2 2026.	Proposal noted re FGS project	The Foreshore Freeway Precinct feasibility and scoping study is underway to generate a high level understanding of the feasibility re a mobility and development solution for the foreshore. Public participation processes will follow at which the FGS proposals can be proposed again. Suggestions are noted here but details will be discussed in a separate process.
237	Urban Mobility Portfolio Committee	FY, the MayCo member introduced it with great enthusiasm as a "phenomenal" piece of work! The idea of a liveable and walkable CBD is embraced, and the reference to the ideas modelled on Barcelona's superblocks was applauded. Jesse reiterated that this supports your anticipated growth in GLA, and supports economic activity; developers are responding positively. Also dovetails with walking and cycling strategy; and the methodology can be replicated in other areas (e.g. where you do LSDFs). A cllr wants to see this in MP, Khayelitsha, and other CBDs. Support SCs to do it. Questions: • A cllr asked re universal access. confirmed we are considering this. • Will new areas be identified for economic activity? Please also consider informal performing as part of informal economic activity? • How will it affect the CID operations? • Plans for implementation requiring other directorates e.g. Parks & Rec; safety & security; Energy (streetlights)? • Thinking around trams? Not appropriate now. • A cllr excited re reducing speed. Congestion around the CBD could be solved with this, but also those routes need to be managed. Need to look at cumulative effects of multiple LU applications for increased traffic • Cost of this, to replicate elsewhere? • Please review DC's to support PT and projects like this, not just roads for cars. • S&S should be integrally involved – pedestrians are also a market for criminal activity / drug-dealing there	Various questions on practical implementation	Universal access, will be addressed where practical but only during project implementation phases. Informal activation of spaces, will be budget dependent and on initiative of implementing partners and private sector initiatives. CCID operations will not be affected by this plan as they deal with their own budget and business planning processes. Plans by different line department, where known are included in the Implementation Plan (Chapter 6). Trams ideas are not considered now. Cumulative impacts of multiple land use applications are considered in the TIAs and the updated meso and macro level modelling. The LSDF project is not related to any future review of the DC policy. S&S are a commenting party to the LSDF Implementation Plan.
238		My main issues are and will always be that the issues / guidelines relating to planning / LUM need to be clear, and tabular, similar to the district plan subarea setup. It helps to provide clear guidance as to what is required. Putting forward the concepts and ideas of the whole document in a clear and concise format.	development guidelines	Tabulation of guidelines is recommended for clarity
239		Additionally the maps legends should be cleaned up to reflect what is on that current map, so if there are no 90m buildings, then that shouldn't be in the legend for that map. It will help streamline and declutter the maps. Too much clutter makes the maps incomprehensible. Consider breaking up the maps into individual categories , which would then increase the number of maps though. And as previously commented the resolution of the maps need to be increased.	mapping	Noted. The precinct drawings are separated into 2 maps: vision for the public realm and then guidance on urban form (with a focus on height, interface) at a high-level and then a precinct level .

240	Paul Heydenrych	You need to be clear about what the City wants in order to shape development via the guidelines. As an example, East City Precinct guidelines. The points listed below, which are not all the issues, but as a way of example for all the other precincts, are not clear. 1. What are the “key views”? This aligns with various “key” area, etc. references throughout the document. What are these “key” spaces/places. I would suggest for each “key” reference that you provide some examples. Like what was done for 5.6.4, Point 5. 2. From what point, or does it mean past the City Hall (Caledon Square too)? 3. What does accommodate mean? Can a person not build higher, and how does that relate to their primary rights. 4. “Being tested” shouldn’t be in an official long term document. It either is or isn’t. 5. How must this be ‘carefully managed’? What does that mean?	development guidelines	1. Taking direction from approved Policy (Tall Building Policy (2013)) , Policy Statement 1, " the location of tall buildings must protect key views to Table Mountain and other mountain ranges.. and the sea from public spaces and key public places" . The Tall Building Policy does not define these locations and it is apparent that not all public spaces and places in the CBD can be treated in the same manner (e.g.well established Greenmarket Square is an urban room with limited view of the mountain.) Hence there is a need for this lower order planning tool (LSDF) to define 'key viewlines' and 'key view cones' that can be used specifically when the Tall Building Policy is triggered (in other words where additional rights are being sought) Notwithstanding, the LSDF provides guidance for future revised overlay parameters. That being said , for new development parcels or precincts there may need to be a consideration of massaging bulk in respect to ensuring a sense of place. Viewcones are being refined to indicated 'from key public spaces', and hence the vantage point is important(to be clarified in each case) 3. 'Accommodate 'within the LSDF treats the statement as a guideline, where viewlines from key public places and spaces should inform all design proposals as a means to enhance the sense of place, not only those whihc seek departures. 4. At the time of print (April) the 3d was underway, for testing key viewlines and key view cones. These will be refined in the final document. 5. Led to frame this terminology more clearly . This will be done in consultation with core PMT members and contributors including EHM & DEV MAN.
241		In 5.6.5, 'localised guidance', what does this “refer to specific provisions” mean, and where is it found? If in the document, reference paragraph or section.	Development guidelines	Specific provisions can be replaced with 'localised guidance' for continuity
242		Such statements are below problematic, and what are the reasons for such statements? Is it a height, built form, use, or all that you want to retain, and why. Is it discussed in the document, if so, reference. <i>Harbour Arcg to be developed as per approved rights; Founders Garden to be developed as per approved rights.</i>	Generalised statements on development potential	It is accepted that approval under the Development Management Scheme will not be overruled by the proposals in the LSDF.
243		Why do some precincts have “general” guidelines, others only have “localised” and some have both. Why this disparity and lack of continuity?	Re-organised development guidelines	In order to avoid duplication the general guidelines (5.5.5) apply to all precitncts. Local guidelines are precinct specific. It is noted the sub headings are not consistent and need clarity. Each precinct starts with a description covering the role of the precinct, then key structuring ideas, followed by Precinct-based development Guidelines. Then all precincts should have localised guidelines
244		Are there an overall set of guidelines for all the precincts that are not repeated within each precinct (is this 5.5.5?)? Again, in table form with grouped sections relating to various categories (Eg. Height, façade treatment, streetscape, movement, open space, etc.). This can also be done / repeated in the individual precinct guidelines so that there is a narrative format thread through the document.	Overall guidelines to be improved and clearly marked. Present grouped sections relating to categories	Yes, 5.5.5. Suggestion of tabling and grouping guidelines is noted
245		For me it is all about refining the guidelines you are trying to put forward. You have done the background work for why you want it, now it is just be solid about how you say it. To make it clear as to what is wanted and where.	Development guidelines	Noted

246	Berendine Irrgang Environment and Heritage Management (Heritage section)	Aspects requiring further consideration mainly relates to the following: -Editing of the text to improve reader-friendliness. -Some maps are to be refined, particularly the 'Character Areas' map (p60). E&HM can assist with this. -A stronger component on the character precincts, as the starting point for the LSDF spatial proposals, should be included in S5.4. Character Areas (p54). -The Significant Heritage Clusters table 5.6 (p57) has been updated by Claire Abrahamse/ E&HM and the revised version (see Claire Abrahamse comment) should be included. -The principles for interface and setback guidance (p66) are important and can be expanded on. -Importantly, the range of heights proposed in the precinct maps should clearly be linked to inclusionary housing incentives in order to avoid uncertainty around spatial proposals and when a specific (height) directive would apply. There are minor corrections to some of the heritage layers (following the consultant's review) which E&HM are keeping track of and which will be provided for inclusion into the final document. -The link between the guideline text and accompanying maps (for the precincts) should be clearer. The previous version, with guidelines positioned adjacent to the maps, was perhaps more user-friendly as a 'snapshot' of requirements. It is suggested that, once approved, a short 'hand-out' version be prepared of the precinct indicators and guidelines.		1. Authors to seek to bring in S5.4 (p57) into spatial ideas 4.4
247			Heritage clusters	2. Significant heritage clusters are being incorporated, as per EHM issue 31 May 2025
248				3. Principles of interface and setbacks are important. The LSDF Policy provides spatial forward planning guidance at a lower order planning level, with the intention to inform heritage management plans and the overlay as separate additional processes. Table 5-1: Schedule of route classifications, typical characteristics and designations and column land use and character response could be linked with 5.5.3. Street interface informants for typical cross sections <15m, 25m and 30m street cross section, fig 5.19, The LSDF in its current form does not reconcile setbacks and only discusses in principle. It is warranted that where setbacks are proposed, these are provided at the level of principle for key typological conditions. These could be absorbed into 5.19 and/or Annexure C .
249				4. In light of processes followed and workshop style approach to reaching consensus, plus the building economic lens still required , please refer to chapter 5.7 , figure 5. 41,42,43. " It is important to note that any mechanism that is intended to incentivise private sector development to align with city policy, must strike a balance between regulation, City requirements, and a reasonable return on investment for private sector developers. This will ensure the best chance of success for the mechanism." In summary, the upper height range will be subject to the overlay zone work, which needs to marry building economics, incentivisation, various public goods as articulated in chapter 5.7 ,
250				5. Positioning text next to the maps as per the previous (Sept- Oct) iteration was not supported for reasons of 'clutter' & ' legibility'. The final layout representation will need to be investigated . ' Hand - out' version on one page is preferred plus there is a suggestion to tabulate the guidance. Acknowledged this needs to be teste/ reviewed prior to the final iteration.
251				6. Thank you, final heritage layers received 31 May 2025. Co-authors to check final drafts
252			additional comments in text as per pdf - email CBD LSDF comment - E&HM	
253			1.1 - Transition concept to be set out more clearly.	Noted
254			Table 2-1 CCDS references confusing - rather use actual document names as noted in table 2.1) Central City Development Strategy - Vision and Action Plan (2009) and CCDS - Development Guidelines for Land Use Management (2012)	Change naming in Table 2-1 : Central City Development Strategy - Vision and Action Plan (2009) and CCDS - Development Guidelines for Land Use Management (2012)
255			Table 2-1 Core of the East City Precinct - Is this the Fringe work?	Thank you noted. The document 's cover is called: East City Core Vision and Guidelines (draft) - 2016

256	2.3 - Not sure what this means, as this CBD LSDF serves as policy approval mechanism for some of the Gateway proposals. Should be clarified that this text comes from BKLSDF. Check whether this is relevant to LSDF/ frame it to make sense in this document.		Review 2.3 in light of comment with reference to specific Gateway related proposals.
257	3.1.4 - Not sure about this sentence (linking congestion to 'executives' and high earners). Presumably more a general car dependency.(first sentence)		Noted, language to be reviewed.
258	3.1 Synthesised contextual narrative (3.1.3) - Replace text: ...which relies on a measure of discretionary decision-making and includes areas where heritage significance has been reduced over time.		Review 3.1.3 in light of comment.
259	3.2 spatial constraints - Add point previously included: 'Recognition of the sense of place and character-defining elements of the CBD and enhancing this through contextually appropriate redevelopment which complements precinct character.		Noted , add text
260	Idea 5 - Additional map is noted, but main idea here should still be expanded to rather refer to built form character/ sense of place/ character areas and precincts, which is one of the main structuring elements of the LSDF.		Noted, wording and/or map to be incorporated
261	Idea 5 - As noted before, this (the idea of re-establishing historical transport routes) does not make sense as a main CBD spatial idea and should be reworded.		Agreed, this was also noted as a finding at the internal working session 14 November 2024 . The drawing and text were updated, but the annotation text was not corrected. Thank you.
262	5 (3) - Long sentence; can be reworded. (More explanation on character precincts and the theoretical background should be provided elsewhere). - See CCDS 2009		Noted, rephrase.
263	figure 5-2 Rename - Draft Concept and public realm vision		Noted , rename 5.2.
264	System 1 - description - Should description not be more specifically about this particular system?		Noted for consideration albeit being cautious not to increase length of text as a general rule
265	include 'living streets' in definition		Refer to table 5-1: Schedule of route classifications, typical characteristics and designations for description , and Glossary (page 151)
266	figure 5-9 Also between Grand Parade & City Hall on Darling Street & between Grand Parade and Castle		Noted , add to paragraph above 5-9 including lower end of Buitenkant (between Grand Parade and Castle). Note the interface and street treatment between Grand Parade and City Hall is a much augmented concept including cross sectional change, as this is designated as a ' transit street', whereas the other instances need to accommodate a mobility or bypass function.
267	5.4 - Include a section on the character precincts here. Could be in table format, explaining the logic of the precinct structure of LSDF and characteristics of each precinct here. See CCDS 2009		Noted, character precincts can be cross referenced but document must not repeat Chapter 5.6.
268	destinations - Grand Parade as major event space?		Noted, add Grand Parade as a destination
269	Page 62 (last bullet) - and precinct character, based on an analysis of built form, heritage significance, existing building heights and urban grain,		Noted, add recommended phrase.
270	Principles for interface and setback guidance - Allow more space for these drawings to be legible.		Noted . Improve resolution /Legibility of drawing 5.19
271	5.5.4 - It must be clearly stated here (and elsewhere) that the height range is indicated to provide for inclusionary housing and that it does not function as a de facto upper end for any development.		Upper height range will be as per Chapter 5.7, mechanisms need to quantified
272	figure 5-21 - Change title as per discussions to note this is a longer term conceptual vision plan, to avoid confusion with precinct 'heat' maps.		Fig 521 will be substituted with two maps 'long term CBD Height Vision ' and then the combined LSDF map (updated Annexure D) . As per 3d workshop recommendation (31 May 2025) the global height map should be conceptual, focusing on the vision of the city rather than the specific numbers, which could lead to confusion, with precincts providing the detail .
273	figure 5-21 - Test and images not legible and could be removed?		noted, the layout to be simplified
274	figure 5-21 - Very tall cluster to pull away from Standard Bank, as in precinct maps.		Noted, with the final GIS base drawing set this should be evident
275	figure 5-22 - Clarify title - see earlier earlier comment (Draft public realm concept and vision)		Noted, 5-22 is a duplication of 5-2 so one of these will fall away.
276	5.5.5 It should be clearly stated that the purpose of the height range is primarily to function as an incentive for inclusionary housing or other clearly defined public good contributions. It can not be interpreted as a de facto upper limit.		Noted 5.5.5 can make more direct reference to Chapter 5.7. Also refer to glossary

277	5.5.5 (7)(c) - and as informed by street widths - see section 5.5.3.		Noted, 5.5.5 (7)(c) - and as informed by street widths - see section 5.5.3, albeit 5.5.3 (fig 5.19) has limitations to address setbacks of varying heritage conditions. It is recommended additional guidance be provided in Annexure C , where applicable.
278	5.5.5 (8)(f) - 'low-rise fine-grained built form groupings' rather than heritage areas.		Noted, 5.5.5 (8)(f) - 'low-rise fine-grained built form groupings' rather than heritage areas.
279	5.6 Precinct based development guidance - The following should be included as a standard 'guideline' in the text to allow for the detailed heritage assessments as part of statutory processes (as before on map page): In certain defined special areas and streetscapes, further protections are to be established to protect the unique architectural character and scale. Some landmark buildings, due to their historic or architectural significance and or distinctive built form, should not be added to or substantially altered. The proposed maximum height is a generalised indicator and does not imply the development of the full footprint across the site. The height limitations are a general indication: exact built form parameters for each site will be informed by the presence of heritage resources and the character of the immediate surrounds. In some scenarios, such as where there is a graded heritage resource on site or immediately adjacent, or where there is a clear existing pattern of building heights and datum lines, the recommended heights might only be achievable by implementing substantial setbacks for new bulk additions. In some scenarios, such as where there is a graded heritage resource on site or immediately adjacent, or where there is a clear existing pattern of building heights and datum lines, the recommended heights might only be achievable by implementing setbacks for new bulk additions.		Noted, the expanded general guidelines to cover paragraphs as mentioned, as per previous iteration (Sept -Oct)
280	figure 5-24 Step 1 should make reference to the Character Precinct within which the site is located, as a base informant for many of the spatial proposals.		Noted, a precinct location map could rather work as the first map.
281	5.6.1 - second paragraph - Suggested rewording: Development proposals in this vicinity should carefully consider these historic informants and possible restrictions imposed by the presence of human remains.		Noted as part of , and in addition to the existing phrasing and framing within this paragraph.
282	figure 5-25 - Green link along Buitengracht should be included conceptually as part of tree canopy		Noted, it is shown (it appears lighter due to a masque applied to highlight the precinct limits)
283	<i>special focus or localised condition</i> - This legend item should be removed from maps - it was a heritage informant to balance protection with development encouragement in analysis process, but does not add value to these maps and adds to clutter/ confusion with 90m legend.		Referring 5.26, the legend item is still applicable for example the V&A(PoP) Noted, however the lozenge shape following the highway can now be removed as desired heights are settled.
284	figure 5-28 - Check height proposals for Customs House to avoid additional bulk over domed portion. Indicate as landmark building.		Noted, will follow 31 May workshop recommendations with additionl of land mark status label.
285	figure 5-28 - Datum lines can also be extended to either side of Pier Place along existing buildings		Noted, and to be cross checked against Roggebaai overlay parameters as the initial 'raison d'etre' for the datum line.
286	figure 5-28 - Check updated EHM heritage cluster map - this does not seem correct. (No clusters north of Riebeeck street)		Noted, will incorporate latest EHM layers
287	Mid city precinct development guidelines - Should the idea of the Buitengracht stoep not be more clearly expressed here?		noted
288	figure 5-30 - Interfaces between 'up to 90m buildings' and clusters/ pink buildings to include clearer graphic for setbacks (green dash)		noted
289	Figure 5-30 (legend item) <i>Approx. 90m, with appropriate contextual response</i> - This should also be indicated as a range, e.g. 60-90m or as maximum upper height of 90m... (From previous comment: The 90m height north-east of Strand Street. It is agreed that greater height (i.e. 60m +) can be accommodated in this 'transition' area between old and newer parts of city, but this height should be accompanied by spatial provisos, e.g. setbacks, street level activation, public realm improvements etc.)		Noted, legend to be updated. All specific provisions and parameters can only be defined through the overlay / bylaw change. These principles could be added within Annexure C where applicable.

290	figure 5-30 (legend item) <i>tall building localised cluster that can support similar height within cluster</i> - Not sure what this means: existing heights include anomaly towers - will this therefore be acceptable as height and override these indicators?		The principle adopted here is that there is a level of visual absorption where there are already higher buildings. There is sufficient precedent that this is an existing height cluster of 90m buildings, and through identifying this cluster as such, it safeguards the precinct 7 core, and future anomalies.
291	See updated 'pink' layer - Check previous Cluster table and names for consistency. Description is Church Street: Loop to Burg, so area can be extended along Church.		Noted. Document to reference input layers received 31 May 2025.
292	figure 5-30 (legend item) <i>reference to DMS area</i> - Not visible on map - St Georges Mall?		Note update & clarification
293	precinct based guidelines should make reference to associated precinct map. Other mapping references in text also missing in the document.		Going forward a recommendation received is that it will be worthwhile to tabulate guidance for ease of reference.
294	Page 94 - last bullet - Not clear what last part of sentence means		As per similar related comment all viewlines and viewcones are to be clarified.
295	5.6.5 (5) - Improve the visual and pedestrian connections between the Grand Parade and City Hall and Grand Parade and the Castle through surface treatment ('carpet').	CBD MAP & Implementation	Noted to be added. The detail would be subject to a CBD MAP project.
296	page 106 - addition - Encourage positive street interfaces along Maynard and Buitenkant Streets and avoid sterile streetscapes as a result of boundary enclosures and on-site parking.		Noted, page 106 - addition - Encourage active & positive street interfaces along Maynard and Buitenkant Streets and avoid sterile streetscapes as a result of boundary enclosures and on-site parking, or similar phrasing.
297	page 106 (5) - This should also refer to Wandel Street HPOZ and number 5 added to map in that area as well.		Noted, page 106 (5) - This should also refer to Wandel Street HPOZ and number 5 added to map in that area as well.
298	mid city - Consider upgrade of Church Street antiques market area as streetscape upgrade project.	Implementation plan	Noted, Refer to implementation plan & CBD MAP
299	company's gardens - Consider sidewalk/ streetscape upgrade in response to Noor El Hamedia (Dorp St) mosque prayer space.	Implementation plan	Noted, company's gardens - Consider sidewalk/ streetscape upgrade in response to Noor El Hamedia (Dorp St) mosque prayer space.Refer to implementation & CBD MAP
300	Page 3 - height ranges no longer applicable	Annexure C	Noted, height ranges will follow the 3d team charrette process & final recommendations and conclusions
301	Page (image 1) - Not sure where section is taken through - this is corner of Pepper Street, so Precinct 8.	Annexure C	The Image captures the intention and location can be clarified
302	Page 4 - heritage indicators - Updated EHM layers to be used in final version	Annexure C	Noted, EHM to supply
303	Page 5 - ranges/heights to be updated as per latest maps	Annexure C	Noted, height ranges will follow the 3d team charrette process & final recommendations and conclusions
304	Page 5 - heritage fabric also to be shown on Bree, as per image 1	Annexure C	Noted, EHM to supply
305	Page 6 - Duplication - To be replaced with heritage synthesis map.	Annexure C	Noted, EHM to supply
306	Page 10 - Duplication - replace with heritage synthesis	Annexure C	Noted, EHM to supply
307	Page 12 - Old shoreline to be included as indicator	Annexure C	Noted, EHM to supply
308	comments as per pdf and word document - email CBD LSDF comment		
309	1.2 Define "transition" better - transition to what? Perhaps refer to Section 4 of the report, or explain in a footnote.	Better explanation required for concepts	Noted
310	3.2 Figure number missing.	Text formatting comments	For clarity, Figure number 3.2 is noted on page 16
311	3.2 (3) as well as the enhancement and conservation of heritage clusters, which are fine-grained, human-scaled environments.	Heritage clusters	Add/ Rephrase to include suggestion - 3.2.(3) page15. Consideration of the word 'conservation'
312	General note: on many pages there are small areas where the text seems to shift out of scale, to be larger than the predominant text. In this instance "the City of Hope" is larger. Please check this throughout the document.	Text formatting comments	Noted
313	4.3 (3) Perhaps include a statement that the adaptive reuse of buildings already existing in the CBD forms part of this patterning.	Adaptive re-use of buildings to be included	Add/ Rephrase to include suggestion - 4.3.(3)
314	4.3 (6) I think we should ask that this section refer to clusters of heritage buildings as contributing to the legibility of the city, where they provide a sense of familiarity and continuity through time	Heritage clusters	Add/ Rephrase to include suggestion - 4.3.6
315	4.4 Idea 5 - Not only transport. This includes the route of the Kaapse Klopse, traditional annual events such as the Cape Town Cycle Tour, historic links like the Camissa route, religious events like the Iftar in Dorp Street, the noon gun as a temporal site of historic significance and continuity. I think this idea should be slightly expanded to include "heritage links" and "historical routes".	Additions to Idea 5	Agreed, rephrase to include suggestion - 4.4 idea 5
316	Figure 5-2 Maybe name this map Draft Concept and Vision. For instance, the Strand Street Quarry is not currently a destination.	Suggestions re maps, style and colours	Rename image 5.2

317	Claire Abrahamse	System 3 - Project Formulations (9) - Unclear about what this last point means.	System 4 descriptions	System 3 (9) 'Keep friction and nature of property access within Buitenkant Street.' To clarify, the character of the street should maintain elements of the fine grain fabric, hence should not become, nor designed, for mobility and general traffic bypass functions (i.e. with fewer entrances and fewer carriageway crossings). This idea is further developed and qualified on page 37, where the 'Activity street' definition is provided in relation to Buitenkant Street.
318		System 4 - Description - It is also a rare, interesting and intact piece of Modernist city-making that does have positive characteristics which should be recognised and enhanced. Height datums should be held, the enclosed urban squares should be enhanced and improved, and planting patterns along spaces like the Heerengracht managed and reinforced.	System 4 additional descriptions	Noted
319		5.4 - Flesh out the role of character areas in the LSDF, and how it is part of the methodology and foundation of the LSDF in an introductory paragraph here.	Similarities or not between character areas vs heritage clusters	Noted
320		Significant heritage clusters C14 - Together with the highly historic Lutheran Church precinct, this heritage cluster represents a fairly intact grouping of buildings of high architectural value and with a scale, grain, height and street-interface, including projecting balconies and colonnades, that is highly articulated and human-scaled. With the street-planting and pedestrianisation of this street, this cluster has a pedestrian-friendly character and scale.	Heritage	Noted, 3d LSDF team to supply base info for revisions.
321		Significant heritage clusters C15 - This cluster of buildings comprises a wide range of buildings, mostly commercial in typology, but of varying ages and architectural styles. Together they form a consistent streetscape in terms of lower-to-mid range heights, a predominance of walled architecture, but with a positive streetscape interface. Many of these structures have been successfully adapted to new uses, and form a backdrop to significant adjacent areas such as Riebeeck Square.	Heritage	Noted, 3d LSDF team to supply base info for revisions.
322		It is useful to note that these special character areas intersect with the significant heritage clusters, reinforcing the idea that these pockets of heritage fabric contribute as a positive setting to a rich, urban, cultural public life.	Special character areas intersect with heritage clusters.	This was considered. The special character (sub)areas deal with operational and management related needs, from a perspective of land-use or land-use change. The methodology for defining the heritage clusters is different and include protected status.
323		5.5.5 - Clarity required as to when you can achieve the upper part of the height range.	Conditions for development options to upper height range.	The LSDF is a lower order, forward spatial planning instrument that does not give or take away rights. The draft LSDF attempts to reconcile the current status quo which contains protection measures (HPOZ) and incentivisation measures (where the original incentive-based overlay is out of date and requires to be updated) (ref page 74). Considering Chapter 5.7, which describes both the challenge of protective and incentive based mechanisms, the mechanisms and regulatory change still need to be quantified and tested. Until the regulatory change occurs, applications will be motivated and reviewed on merit using approved policy tools such as this LSDF & Tall Building Policy (2013) amongst other approved strategies and policies. Figure 5-24: Step-by-step guide on interpreting the design concepts from principle, through to precinct and erf level contain the design rationale how to inform commenting and decision making.
324		5.6.1 - Not urban conservation area, HPOZ	HPOZ	Replace inaccurate phrasing - 'conservation area' with HPOZ.
325		Figure 5-27: Check this cluster. I don't think it is one of the identified heritage cluster areas.	Heritage cluster	Figure 5-27 & 5.28 West Foreshore Precinct 6: Lower Loop heritage cluster - refer to latest heritage cluster areas as per recommended revision from EHM (20250531)
326		Figure 5-28: LANDMARK STAR ON THIS BUILDING - customs house	Landmark star missing	Noted -Figure 5.28 update reference to Customs House as a landmark, as per EHM (20250531)
327		Figure 5-30: PINK - SE Corner Strand and Castle intersection	Castle Cluster	Noted - update cluster as per EHM recommended revisions (20250531)
328		Figure 5-30: Extend this Church Street cluster all the way to Burg Street	Church Str cluster to be extended	Noted - update cluster as per EHM recommended revisions (20250531)
329		Company Gardens precinct based development guidelines (3) - active ground floor interface... and the use of colonnades and balconies over the pedestrian footway.	Company Gardens precinct guidelines to include active ground floor	Recommendation considered in light of Table 5-2: Schedule of pedestrianisation routes and project descriptions
330		Figure 5-36: The low building edging Adderley should be a landmark.	Landmark star missing	Noted

331	Figure 5-36: Pull this back to create open space in front of Castle.	Improve open space in front of Castle	Figure 5-36: Station Precinct 10: Development guidance drawing to be updated as per recommendation
332	Figure 5-36: This has already been carefully designed and approved at HWC and CoCT. Adopt those urban design envelopes.	Incorporate approved HWC guidelines re Station Precinct	Noted
333	Lower Gardens precinct based development guidelines)5) - and Wandel Street HPOZ	NOT CLEAR RETURN	Noted
334	Implementation plan project 001 project title - Investigate the rationalisation of the HPOZ... In parallel with this, develop Heritage Management Plans for particular precincts.	Rationalisation of the HPOZ should become and action plan item	Noted, add to project 001 description.
335			
336	Page 3 (Green street) - Perhaps a photo in Bree Street, instead of Buitengracht (which is on the edge of the precinct) would be better?	Suggestions re graphics or photos	Noted
337	Page 4 - I think the height colours and the heritage colours are perhaps a bit too similar. The height colours could be a spectrum of greys, with the lowest heights darker greys, and the tallest closer to white.	EHM to supply	Noted
338	Page 5 (Living street) - This photo is taken in Bree Street, which is in Precinct 8. I suggest it be replaced with a similar photo of the small spill-out space at Cafe Frank, corner Bree and Bloem Streets, which is in this precinct.	Suggestions re graphics or photos	Noted
339	page 6 - These maps are not consistent with the ones for Precinct 7, and it seems the height map repeats.	Suggestions re maps, style and colours	Noted
340	Page 7 (pedestrianisation) - This is actually taken in Longmarket Street, Precinct 7. It should be replaced with an example in Precinct 17, for instance the sidewalk along Dunkley Square?	Suggestions re graphics or photos	Noted
341	Page 7 (Fine Grain) - All these photos are from Google Streetview. I think they can be replaced with photos taken by people in the LSDF team. I am happy to take them.	Suggestions re graphics or photos	Noted
342	Page 9 (images) - Replace with non-Google Streetview photo. I have if needed.	Suggestions re graphics or photos	Noted
343	Page 10 (heritage synthesis) - Wrong map again!	Suggestions re maps, style and colours	Noted
344	Page 15 (pedestrianisation) - Replace this with a photo from the area. Perhaps the lower section of St. George's mall, or along the CTICC?	Suggestions re graphics or photos	Noted
345	I'm writing to express my strong support for the draft Cape Town CBD Mobility & Access Plan, as part of the broader Local Spatial Development Framework (LSDF). This plan represents an important step toward creating a more just, accessible, and economically vibrant city. Prioritising walking, cycling, and public transport — while reducing unnecessary private car traffic — is critical for making the CBD safer, fairer, and more connected for everyone. As a resident, worker and commuter in the CBD, I believe this plan will benefit: • Small businesses that depend on foot traffic • People who rely on affordable public transport (minibus taxis, rail, MyCiTi, Golden Arrow) • Safer and more inclusive access for those walking, cycling, or commuting without cars	Preference to affordable public transport, better walking, cycling and commuting (without cars) conditions	Noted with thanks.

346	Ruaan du Plessis	I would like to offer the following suggestions and concerns for consideration as the plan progresses: 1. Support semi-permanent informal trading structures to promote more formalised, organised trading for this important sector of our economy. 2. Relocate some informal trading bays from narrow sidewalks to wider open spaces to improve pedestrian safety and mobility — especially along Darling, Adderley, and Waterkant Streets. 3. Prioritise the proposed Transit Malls along Darling, Wale, and Adderley Streets. 4. Fast-track the Strand-Adderley “intersection redevelopment”. 5. Revive the proposal for a fully pedestrianised Longmarket Street, to realise the previously envisioned East–West Link in the earlier LSDF drafts. 6. Install zebra crossings at all major intersections within the CBD to improve pedestrian safety. 7. Add formal drop-off zones for minibus taxis (MBTs) along busy commuter routes. 8. Assess and improve safety at key MBT drop-off points, especially where commuters currently cross unsafely, such as the intersection of Hertzog Boulevard and Christiaan Barnard Street. Vehicles exit Nelson Mandela Boulevard at high speeds here, while commuters have no safe way to cross. 9. Install bollards on traffic islands at zebra crossings to prevent MBTs and “delivery bikes” from using them for U-turns — a common issue along Adderley Street and at the corner of St Georges Mall and Strand Street. 10. Designate on-street parking bays for delivery bikes in hot zones, to reduce the obstruction of sidewalks. 11. Ensure pedestrian signals at intersections respond promptly when activated, and prioritise pedestrian movement over vehicle flow — currently, many buttons seem non-functional or give delayed responses.	Several propsals on informal trade and traffic management and movement. Variety of proposals on street redesign, pavement and intersection treatment, taxi stops, and delivery bikes.	The CBD Map project will consider the propsals where possible.
347		I urge the City to adopt and implement the Mobility & Access Plan with strong community engagement, clear public timelines, and a commitment to visible, meaningful change on the ground.	V&A supports the pedestiran linkages between cruise terminal and V&A Dock Rd is important and pedestrian and physical link. Link to be via canals.	Noted with thanks.
348		1. Public transport I recently caught the train from the southern suburbs into the city to see if it's a viable and attractive alternative from using my car. I am in the classic 'one passenger per car' segment, dealing with traffic, congestion & expensive inner city parking on a daily basis, so a quicker and more affordable option is very attractive. My goal was to answer the question “Would I catch the train from Rondebosch into the city daily as a quicker and cheaper alternative to driving my car” Key takeouts: • Although very full, the train was clean, safe and impressive • Wait time at Rondebosch station was 15 minutes, train ride was 15 minutes and walk on either side was 15 minutes. Congestion trying to exit the station (ticket readers weren't working) was 10 mins. Total 55 mins (vs 30-50 mins in the car) • Having to pay for my ticket with cash was a hinderance I decided it's still more attractive to use my car. What would make me catch the train more frequently: • cashless ticket sales • more frequent trains therefore shorter wait times (specifically referred to in the LSDF) • less congestion in the carriage & having a seat • an app to track train departure times	Proposals re train use vs car use.	Noted. The train service is still under the management of PRASA rather than the City of Cape Town. However a new Service Level Plan will hopefully allow greater cooperation to improve these and other factors. Please note that: - headways are set to reduce from 20mins to 10mins on the Southern line shortly - Metrorail does now accept card payments - GoogleMaps now shows train travel times based on the time table. City has been informed that Metrorial intends to change this to "live" information in future

349	Terri Macduff (Mission for Inner City)	2. Greening & lighting The LSDF refers to the improvement of lower order streets & pedestrian links with landscaping, as well as Harrington Square becoming a defining public space.The Mission for Inner City should dovetail these plans by lighting these links and green spaces, to ensure improved safety and night time use.	Proposals on greening and lighting to be implemented	Noted the City has an Memorandum of Agreement for implementation of a pre-agreed business with The Mission.
350		3. Tourist attraction via improved walkability To leverage off the significant tourist trade from the cruise ships arriving at the V&A, it is essential to connect the V&A with the inner city via improved walking routes, incorporating green spaces, wayfinding, lighting, public art and public seating. This should remain the Mission's primary placemaking focus area.	Wayfinding between V&A, Cruise Terminal and rest of the CBD Critical	Noted the City has an Memorandum of Agreement for implementation of a pre-agreed business with The Mission. Waterfront Walk Project in MAP (Project 059)
351		Embed a Tactical Urbanism Framework for Quick Wins - To support the LSDF's goals around walkability and activation, we recommend developing a tactical urbanism toolkit within the Implementation Framework (Chapter 6). This could include low-cost, scalable interventions—such as parklets, pop-up retail, temporary furniture, and mural programmes—that allow for real-time community feedback and iterative improvement while building public momentum.	Develop a Tactical Urbanisation Toolkit within the Implemenation Framework.	CBD Map Project should consider to incorporate these proposals if not already included.
352		Establish a Street-Level Placemaking Partnership - While the LSDF provides a strong spatial and strategic foundation, we suggest the inclusion of an operational framework for precinct-scale implementation. MICCT proposes the formalisation of a “Street-Level Activation Partnership,” bringing together the City, CCID, MICCT, property owners, and local creatives. This entity would oversee public realm improvements, curation, programming, and stewardship on a block-by-block basis.	Details for The Mission Business Plan	Proposals will be forwarded for incorporation into The Mission Business Plan.
353		Define Maintenance and Stewardship Model - For long-term public space success, the LSDF should specify maintenance responsibilities beyond the CCID. Formalising models for care, custodianship, and governance—with links to KPIs—will help ensure clean, welcoming, and inclusive spaces across the CBD.	Long term management and maintenance model	The CCID/ Special Rating Areas are the only official and legislated model. The Study area of the CCID is limited to an area where the private property owners have contributed to additional services. The problem is that the rest of the CBD LSDF study area is prodominantly owned by different government models and the SRA model is not working for government land owners. The City is working towards a new programme management arrangement for these areas
354		Recognise St George's Mall as a Strategic Urban Spine - St George's Mall holds significant cultural, pedestrian, and economic value. The LSDF could better articulate planned interventions for this key public space to ensure alignment and avoid duplicative efforts. Are there additional project details available?	St Georges needs upgrade	There is a project under development with the City's Urban Design Department. Information will be available to The Mission, once more clear.
355		Strengthen Greening and Irrigation Strategy - We are curious whether the City has explored the use of underground water sources for greening projects. Additionally, could fruit trees be considered as part of a public nutrition strategy?	Underground water to be acknowledge	D6 Public Realm Strategy water study and exploration to comment, also refer to last PMT meeting notes which suggested that key public space redevelopments explore the use of water. It is acknowledged that often the water quality and depth of the water, and operational concerns, remain challenges for City led projects.
356		Formalise Informal Trading Zones - While informal trading is vital, its current form can hinder pedestrian movement and inclusive access. Has the City considered centralising or formalising vendor zones—potentially through curated market sites or shared infrastructure?	Proposals on management of informal trade	Informal trade department to note the proposals and incorporate in operational plans.
357		Clarify Intent for Dunkley Square - Dunkley Square is listed within the Lower Gardens Precinct but lacks detail. Could further context be provided on proposed interventions or planning timelines?	Dukley Sq (implementation &UM)	It is listed under Significant heritage clusters and spaces (C9).. A dependency may be the CBD parking strategy work (Implementation Plan)
358		Strengthen Walkability Links to Tourism Nodes - Given the tourism potential linked to cruise ship arrivals at the V&A Waterfront, the LSDF should emphasise improved pedestrian connections between the Waterfront and CBD. This includes wayfinding, lighting, green infrastructure, seating, and public art. MICCT is keen to ensure its placemaking work complements the City's efforts.	Wayfinding/ coordination of pedestrian connections between V&A, TNPA and City to be enhanced.	Proposals are included in the Implemenation Plan
359		Introduce Safe Mobility Hubs for Delivery Drivers - The LSDF does not yet address the growing needs of e-commerce-linked delivery drivers. We recommend including designated “Safe Mobility Hubs” within the CBD—safe, demarcated areas where delivery bikes can wait between trips. These hubs should consider security, shade, charging access, sanitation, and proximity to key retail zones.	Safe Mobility Hubs for Delivery Drive	CBD Map Project should consider to incorporate these proposals if not already included.
360		NOTE: MICCT listed a number of projects they would like to be contribute/partner with the City on.	Include projects	The Missions projects will be incorporated in the Urban Management Part of the Implemenation Plan.

361	Guillaume Narainne , Deon Fourie, (Western Cape department of Infrastructure)	In terms of mobility, the suggestion of the pedestrianisation of 'school streets' and the overall increase in mobility throughout the City would support the needs identified by the Western Cape Education Department (WCED) in their UAMP, which emphasises the desire to increase access to education as well as improve mobility between schools in order to equalise pressure between over- and under-utilised schools. The promotion of pedestrianisation, Non-Motorised Transport (NMT) and public transportation is also aligned with the WCEDs need to decrease reliance on costly learner transport. The suggested increased safety measures accompanying the envisaged pedestrianisation of key routes (particularly 'school streets' – pg 39 & 104) throughout the City also addresses the need for improved safety of pupils.	School streets are supported	Noted.
362		The goals of densification, intensification, and transformation, however, seem to lack adequate discussion and consideration of the increased need for community service/facility provision that would be required by these goals . The LSDF Draft mentions, in relation to residential expansion, "new growth is estimated to be about 1,5 times greater than the current residential base", yet in terms of increased community/social infrastructure, it is noted that "No significant new social infrastructure has been built between 2012 and 2024", and that only a 5% growth has been achieved in this period. It is further stated that "The total amount of community and recreational related floor space and land uses to be constructed over the next ten years is fairly minimal..." - at an "anticipated increase of about 5% of the current supply" (pg 111-112). "Considering the 2020 population, Cape Town CBD is sufficiently served with community facilities particularly" (pg 115). However, the WCED UAMP states "population growth is most pronounced in the City of Cape Town and other major towns with a consequent under-provision of school infrastructure in these areas" .	Lack of acknowledgement and clarity on strategy re potential future demand of densification on community facilities (education and health).	Further consultations with WCG Dept of Education and Health have been undertaken and the document upgraded. The Education UAMP specifically at the moment refer to the massive intensification and densification in the metro south east region where there historically, an under provision of schools existed. The Rapid School Building Programme is actively targetting new schools in the right locations.
363		Regarding the proposal to utilise the Netcare Christian Barnard Memorial Hospital (page 33) as a spatial anchor within the Foreshore precinct, clarification from the LSDF is needed in relation to how this will be operationalised. Also, perhaps clarify the intended role of the nearby WCG-owned building (Artscape) in this regard.	Spatial Anchor	Suggestion noted
364		As much as the LSDF is mobility driven, there is a proposal to utilise government-owned land for affordable housing in the City Centre. However, there is less emphasis on the intensification of community infrastructure provision (such as healthcare) to meet the rising demand that will stem from higher residential densities.	Community Facilities do not get enough attention.	Further consultations with WCG Dept of Education and Health have been undertaken and the document upgraded.
365		In relation to the mention of ensuring sheltered space for District Six Clinic users (page 8), clearer clarification is required on the street extent, where this will be implemented, and how spatial design will reinforce this in a safer manner for clinic users.	Sheltering for public around District 6 Clinic	Further consultations with WCG Dept of Health have been undertaken and the document upgraded.
366		The WCG has developed a province-wide Master Office Accommodation Plan (MOAP), which focuses in part on rationalising the provincial footprint in the Cape Town CBD. This includes transitioning from leased space to government-owned buildings, driven by cost-efficiency, improved utilisation, and long-term service delivery imperatives. Observations: •The LSDF currently does not reference provincial office nodes or space planning needs. This is understandable, given that the MOAP is a WCG document not widely circulated externally. • There is, however, a critical need for intergovernmental dialogue, especially as LSDF precinct plans could affect sites identified for consolidation, modernisation, or disposal by the WCG.	WCG Office space planning to be discussed with the City	Further consultation will be arranged.
367		Figure 6.4 of the LSDF lists "provincial" land parcels. A preliminary internal review shows several discrepancies with our custodian records. Recommendation: DOI: IAM requests to engage with the City of Cape Town to verify ownership and custodian status of public land in the CBD, especially where redevelopment or release is proposed. This is essential to avoid misinterpretation of the WCG's legal responsibilities under the Government Immovable Asset Management Act 19 of 2007 (GIAMA) and the Western Cape Land Administration Act 6 of 1998 (WCLAA).	WCG government building data to be verified	Thanks for the proposal but the improvements are only possible if better information is provided by the WCG and if the Implementation Lists and maps are read together with the table on government properties in the proposals part of the document.

368		Several WCG-owned buildings in the CBD have heritage significance. The draft LSDF addresses heritage overlays at a broad level, but there is no reference to the potential impact of heritage policy on WCG office accommodation or property reuse strategies. Recommendation: The City is requested to consult with Heritage Western Cape (HWC) before finalising any overlay zone amendments or area-based heritage strategies affecting state-owned buildings	Some WCG buildings have HWC limitations	Development options for the WCG buildings will have to be processed between the WCG and the HWC in association with the City's Heritage Department. The review of the Overlay Zone work will consult widely.
369		state owned buildings on Bree and Dorp - has accesibility to government offices been taken into consideration along Bree street. Specifically City Bowl Block between Dorp and Leeuwen street? What will be the extent of the coverage of parklets and proposed street improvements? (page 31 and 31). State owned buildings on Long Street - what effect will the temporal changes have on on-street parked GG Vehicles and associated road reserves , has this been considered? (page 46) Caution: changes to access routes and public realm interventions must account for WCG staff and service users locates in or near government buildings. Some precincts (Long, Leeuwen, Wale street) are already experiencing congestion and parking congestion and parking constraints, which could be compounded by proposed interventions.	Parking consideration to be given in areas surrounding WCG buildings	The CBD Mobility and Access Plan will in subject to further consultation processes. A parking plan will also be developed which should consider these inputs.
370		More locational clarity on some of the WCG-owned properties earmarked for affordable housing opportunities is required (instead of using block info ad a identifier, consistency on using Erf number). It is not always possible to tell which buildings are being referred to (page 49).	Location of Gov projects to be improved	Thanks for the proposal but the improvements are only possible if better information is provided by the WCG and if the Implemenation Lists and maps are read together with the table on government properties in the proposals part of the document. Refer to Chapter 6 Implementation Plan.
371	David Anderson	Deimos is strongly opposed to the City's development plans and the revoking of Street parking. The proper investment will be to introduce more parking in order to support local businesses.	Concerns re possible on-street parking removal.	A next step for this project is a detailed CBD Parking Plan, which will explore the parking needs, and potential options to meet those needs, in the CBD. However, the intention is to allow the private sector to provide parking off-street, for their own needs, but as public parking as well where possible. The culture of parking right outside ones destination is not sutainable, and many businesses benefit from parkers undertaking spontaneous shopping as they walk. Paid parking is also seen as preferable to a congestion charge, which has been advocate for by others.
372		This LSDF speaks of the development plans the City only and do not have the interests of the local businesses and entrepreneurs in mind. This plan does not implement the common strategies of the local businesses.	CBD LSDF does not propose actions for local businesses	A LSDF is generally a document which focuses on the built environment, urban form and projects improving the physical and built environment. Economic development strategies can be listed but it is the main focus of a LSDF.
373		We note that several of our comments on the August 2024 draft report have been incorporated into the current draft report, hence our comments now mainly focus on the changes from the previous report. As previously stated, the aspects of the Cape Town CBD Transition Plan Contextual Analysis that are of relevance to the development and expansion of the V&A Waterfront Development are: • The need to increase the residential population of the Central City • The need to improve public transport access into and within the CBD • The need to provide safe, connected routes for pedestrians and cyclists into and within the CBD • The need to implement public space improvements at key nodes in the CBD and interface with the V&AW	Agreed with need assessment	Noting agreement but no changes in document required.
374		In the V&AW's comments of August 2024, certain additional NMT routes were proposed: 2.1 Ebenezer Walk - V&AW is pleased to see that the existing NMT facility on Ebenezer Road is to connect with Canal Plaza, in V&A's Canal District, as indicated in the De Waterkant Precinct Concept Plan (page 77 of March 2025 draft report). 2.2 Prestwich Link - We note the plan on page 77 also incorporates the proposals for the Prestwich Link . i.e. the incorporation of an upgraded NMT link between Somerset Road and Battery Park via Alfred, Prestwich and Napier Streets.	More pedestrian routes proposed e.g. Ebeneer & Prestwich link	Noted and to be considered in the final document.

375	The V&A Waterfront	De Waterkant Precinct (Precinct 5) - From the draft report and Annexure A, Implementation Plan, it appears that the status of Duncan Road in the Port of Cape Town remains unchanged . Project 056 in the Implementation Plan is described as follows: "NMT improvements at Cruise Terminal, People's Port and Duncan Road. Address safety concerns between trucks, pedestrians & cyclists. TNPA to determine the future land uses for the Coode Precinct." In the draft report, a project reads as follows: "Improve active mobility and e-mobility links to the cruise terminal via V&A and possible Duncan Road". While these improvements would be welcome, it is unclear how they would be implemented given the use of Duncan Road through a Port secure area.	Duncan Road in the Port of Cape Town remains unchanged.	The CBD Mobility and Access Plan has deferred on detailed proposals in the Foreshore Precinct, pending an ongoing study into the potential redevelopment of the area. This is however noted for future consideration.
376		Cruise terminal connection via the V&A Waterfront On page 21 of the LSDF, one of the main spatial ideas is to facilitate a seamless link between CBD and the V&A Waterfront and the Cruise Liner terminal . This is also mentioned on page 24 under public realm structure and in the section dealing with mid-City systems north- south: Lower Long: Upgrade active mobility connections to the V&A Waterfront, the cruise terminal. (page 31) and again in the section dealing with the Foreshore spine (system 4) on page 33. "Project formulations: Strengthen active mobility connections to V&A, Cruise terminal, via/over Buitengracht, and the Canal District." The project for the Gateway is described on page 54 in the Table 5-4: System of CBD gateways & destinations as follows: "G7: V&A Waterfront/ Cruise: Multi-modal access way, interfacing between the CBD, the V&A Canal and Silo Precincts and the Transnet Cruise Terminal. The Canal District /Cruise Terminal entrance at Dock Road is reaching a point of development maturity Increased urban development activity surrounding the cruise terminal will place growing pressure on the port to convert to more general commercial activities and areas of public access. "	Seamless link between CBD and the V&A Waterfront and the Cruise Liner terminal.	No suggestions made other than support for proposals in LSDF.
377		New proposals at the City's proposed gateway between the City and Waterfront as described in table 5-4 on page 54, will promote pedestrian movement and create a legible link to the amenities of the Waterfront, and a link to the cruise liner Terminal. The V&AW supports an initiative by the City to facilitate a vision for the Port that provides for greater connectivity with the V&AW and the CBD. It is noted that Dock Road is viewed as an important link in this scenario. As a pedestrian link there are physical constraints and restrictions of access through the port, hence it is suggested that the pedestrian link between the CBD, Cruise Terminal and V&A should mainly be via the canals	V&A supports the pedestiran linkages between cruise terminal and V&A Dock Rd is important and pedestrian and physical link. Link to be via canals.	Thanks for the support to existing proposals. Emphasis to be placed on the suggestions made.
378		The pedestrian route through to the Cruise terminal is supported which could benefit from improved wayfinding. The "Portside Promenade indicated in green within the port may be difficult to implement given the working harbour nature of this port area."	Wayfinding initiatives to be structured and implemented	Wayfinding initiatives to be included in the Implemenation Plan.
379		As previously stated, the cruise terminal is a facility within a port and is vitally important to the central city and the growth of the local economy. Coordination between V&A, TNPA and the City to facilitate pedestrian connectivity and manage transportation on peak cruise days is currently in place and should continue.	Wayfinding/ coordination of pedestrian connections between V&A, TNPA and City to be enhanced.	Include an action plan in the Implementation Plan. Waterfront Walk Project 059
380		The V&A has previously indicated that Duncan Road should be used for broader vehicular public access as this would provide some relief to Dock Road, South Arm Road and the Buitengracht St. / Walter Sisulu intersection. Hence, it would be helpful if the LSDF could indicate the future intention for the use of the Duncan Road corridor through the port. While the port's operational requirements remain paramount, design and management alternatives for Duncan Road, if only for public transport, should be explored in pursuit of increased public use of this infrastructure.	Duncan Road to be used for vehicular access	The CBD Mobility and Access Plan has deferred on detailed proposals in the Foreshore Precinct, pending an ongoing study into the potential redevelopment of the area. This is however noted for future consideration.

381	Janette De Villiers	as business owners in the area, we rely on customers and clients being able to park in the area, this is not Europe with reliable public transport as an alternative....we need to know we have on street parking in our area. also losing this area to film shoots is going to be crippling to the film industry as it is one area with good European looking streets and pavements and i know how many clients specifically rely on shooting car shoots in this area	Concerns re possible reduction in street parking	Thank you for your comments. A next step for this project is a detailed CBD Parking Plan, which will explore the parking needs, and potential options to meet those needs, in the CBD.
382		roggebaai		
383		the implementation plan projects are not adresssing shortcoming in some areas appropriately. we need to nurture the film industry we need to keep our clients coming back and this area is crucial to that, particularly for car shoots	Protect the film industry and the areas they use	The project management team, consisting of all city line departments, also those involved in managing the events and fil, industry, have been consulted to confirm projects in the implementation plan.
384		we were not notified of any public participation process till this call for objection was raised, therefore i feel we have a right to a town hall to discuss between us before anything moves forward	More consultation needed re localised projects.	The CBD Mobility and Access Plan is still in development, and has been released for early comment as part of the LSDF public participation process. A formal public participation process for the CBDMAP will follow in the second half of the year.
385	Woodstock Residents Association	WRA would like to amplify the YU input. We support the proposed LSDF with the proviso that there will be: • A formal overlay zone that supports affordable and mixed-income housing in the CBD. • Easier land use processes for social housing institutions and non-profit developers & accountability mechanism to avoid the delays like in Pine Road in Woodstock etc. • Land value capture mechanisms to deliver public benefits (like inclusionary housing) in exchange for private development rights & the necessary enforcement mechanisms. • Regulation of short-term rentals & enforcement of those rules to protect local tenants • Timelines on all of the above.	Concerns re on-street parking removal within - specifically along Harrington, Albertus, Constitution, Barrack, and Canterbury Streets	Thanks for the support to review the overlay zone work for mixed income housing, requests for easier processes for social housing, public good incentives, short term rental regulations and principles for public good investment in exchange of additional use rights.
386	Jacqueline Biess	The plan's proposal for Shared Streets — which involves the removal of all on-street parking along Canterbury, street,Harrington Street, as well as: Longmarket Street, Caledon Street, Albertus Street, Barrack Street and Commercial Street - from the intersection with Harrington up to Plein Street and beyond— poses a serious threat to the viability of many retail businesses in the area, including ours. We strongly object to this plan and will do everything possible to make sure that it does not happen in the East City at all.	Harrington Sq and Road should no be considered for reduced on-street parking	Thank you for your comments. Any interventions in the East City would be timed so that the benefits outweigh the costs, including to local retail businesses, due to densification and development in the area. No projects, including in the East City, will proceed without their own detailed design and public participation processes.
387	Candice Judd (Lunacy Wine)	Our establishment is a destination establishment which draws attention from CBD outskirts (Southern Suburbs, Northern Suburbs & Winelands) not having public parking available would result in our establishment needing to close down.	Harrington Sq and Road should no be considered for reduced on-street parking	Thank you for your comments. Any interventions in the East City would be timed so that the benefits outweigh the costs, including to local retail businesses, due to densification and development in the area. No projects, including in the East City, will proceed without their own detailed design and public participation processes.

388	Rehandre Viljoen	Dear City of Cape Town Planning Department, I am writing in response to your recent proposal regarding developments in the Harrington and District Six area. I would like to express my serious concerns with the direction being taken, especially as someone directly involved in business operations in this part of the city. Frankly, the proposal appears to be out of touch with the realities on the ground. Public transport in Cape Town is in a state of crisis, and for a city where many rely on personal vehicles, your plan does not reflect this reality. The continued lack of safe, reliable public transport only makes any further disruption to street access more damaging for businesses like ours. The current situation across Harrington Street and the broader District Six area has already been incredibly challenging. The area has become a permanent construction zone, and it feels like we've been waiting endlessly for work to be completed so that the street can finally become more accessible and appealing for our customers. Parking is a nightmare, and foot traffic is hampered by constant building activity – all of which stems from projects approved by the city. This has had a direct and negative impact on our business, and now your proposal threatens to make things even worse. We are working hard to keep our doors open during a very difficult economic period, and instead of support, we are faced with further obstacles. I must be honest – this proposal, if implemented in its current form, will do more harm than good. It does not reflect the lived experience of the people and businesses that are the backbone of this city. If it goes ahead, it will likely drive businesses out and turn Harrington into yet another neglected and declining city street. We urge you to reconsider this plan, engage meaningfully with affected local businesses, and propose solutions that actually support urban regeneration rather than accelerating urban deca	Harrington Sq and Road should no be considered for reduced on-street parking	Thank you for your comments. Any interventions in the East City would be timed so that the benefits outweigh the costs, including to local retail businesses, due to densification and development in the area. No projects, including in the East City, will proceed without their own detailed design and public participation processes.
389	Young Urbanists	We are submitting this brief addendum to request that the City explicitly include trams (light rail / streetcars) as a possible long-term public transport mode for future consideration in the LSDF. We reaffirm that walking, cycling, MyCiTi, and minibus taxis must remain the immediate priorities for transport investment — especially from a spatial equity, emissions, and access perspective. Our request does not seek to displace or dilute those priorities. However, the LSDF is a spatial framework, not a budget plan. It should be future-oriented and signal openness to alternative modes that could support a denser, more connected and lower-carbon CBD over the long term. We therefore propose the following: 1. That the LSDF or Mobility Plan explicitly reference trams or streetcars as a long-term transit mode under the Transit Streets typology (which currently uses international NACTO definitions) 2. That the document clarify any such reference as exploratory, not prescriptive — subject to future feasibility and alignment with City priorities 3. That this inclusion does not compromise or delay near-term upgrades to the walking, cycling, and bus/minibus networks We also wish to note that there is emerging interest and investigation by the Western Cape Government into tram and light rail systems, both within and beyond the City of Cape Town. We suggest that the City track and engage with these developments — and that the LSDF reflects a willingness to explore coordination should such investments proceed in the future. We are preparing a suggestive map outlining potential corridors in the CBD that may, subject to feasibility, support fixed-route, low-emission transit options in the future. This map will be made available via shared link shortly and is intended to stimulate conversation, not propose an immediate project.	Trams (light rail) and street cars	Thank you for your comment. Trams are an attractive local public transport mode. While they are not suitable for the current and near-future mobility needs of the CBD, the CBDMAP proposals for a more pedestrian- and public transport-oriented CBD will help to create the conditions where trams could be ideal. No projects make it on the City's capital budget without extensive feasibility calculations preceding detailed design. The transport proposals for the CBM will only be included in the MAP Project and futher consulted on after the CBD LSDF has been taken for approval.
390		There are certain high foot-traffic areas in this scope area, however Harrington Street is a destination street, with little to no passing by walking traffic .Our prosperity is linked to the destination value of our East City Precinct!	Harrington Street needs on-street parking	Thank you for your comments. Any interventions in the East City would be timed so that the benefits outweigh the costs, including to local retail businesses, due to densification and development in the area. No projects, including in the East City, will proceed without their own detailed design and public participation processes.

391	Rochelle Fleshman (East City Business and Community Group)	The proposed removal of all on-street parking within our precinct—specifically along Harrington, Albertus, Constitution, Barrack, and Canterbury Streets—represents the most far-reaching and consequential change we have faced since the COVID-19 pandemic. As per the City's draft proposal the district has recovered faster than expected. We believe that we were able to leverage the unique and complex mix of businesses that all work together. A sweeping change to the way visitors access the precinct without fully understanding it's impact can reverse all the progress we made.	Concerns re on-street parking removal within - specifically along Harrington, Albertus, Constitution, Barrack, and Canterbury Streets	Thank you for your comments. Any interventions in the East City would be timed so that the benefits outweigh the costs, including to local retail businesses, due to densification and development in the area. No projects, including in the East City, will proceed without their own detailed design and public participation processes.
392		In light of the above, we respectfully request that the City: 1. Engage with Stakeholders to develop acceptable alternatives e.g. retaining on-street parking on at least 70% of Harrington Square, of which the next public participation is due soon (as well side streets up the Buitenkant Street) if Harrington Street were to become a shared Street. As it stands, the current proposal makes no provision for replacement/large depot parking. 2. Provide a clear public rationale for adopting the "woonerf" (shared street) model, including comparative examples from cities with urban, social, and economic conditions similar to Cape Town. 3. Provide clarity about where commuter's cars would be parked on the periphery of the "woonerf" area. One can agree or argue that certain streets are destined for shared-street model, IF and only IF there are parking spaces made available nearby. 4. Host an in-person consultation with East City businesses, residents, and stakeholders before final decisions are made. 5. Pause implementation until a detailed, quantitative impact assessment is conducted—especially in terms of business continuity and commuter access. 6. Develop a phased or pilot implementation of the plan, allowing live testing, real-time feedback, and iterative refinement based on actual outcomes.	Harrington Sq should remain a parking area. Woonerf concept questioned. More consultation required Develop phased pilots and test ideas before implemenatation.	Thank you for your comments. Any interventions in the East City would be timed so that the benefits outweigh the costs, including to local retail businesses, due to densification and development in the area. No projects, including in the East City, will proceed without their own detailed design and public participation processes.
393	Rochelle Fleshman	Stepping Stones Children's Centre is an established inner city preschool that has served the community for 49 years. From its location at 2 Albertus Street, it is nestled between the District 6 Museum and New York Bagels. Despite our longstanding presence and consistent communication with the city over the last 5 years, even reaching the mayors office, we still do not have a designated drop off and pick zone for children. This has presented a huge challenge to our parents and scholar transport drivers who struggle with safe and convenient access. The proposed pedestrianisation of Harrington Street will further restrict ACCESS, exacerbating an already difficult situation. Compounding these access issues, our enrolment numbers dropped significantly after the covid-19 pandemic. Limited parking for drop off and pick up still continues and the pedestrianization of Harrington Street could potentially deter more new enrolments, hindering our efforts to grow and sustain our school community. We propose pausing the LSDF plans and conducting stakeholder impact assessment for the Harrington area.	Consider drop off facilities for certain lan duses	Thank you for your comments. Any interventions in the East City would be timed so that the benefits outweigh the costs, including to local retail businesses, due to densification and development in the area.
394		The guidelines do speak to the future of Cape Town but stakeholder engagement is necessary to remain responsive to emerging challenges.	More consultation needed re localised projects.	Thank you for your comments. Project packing will proceed with public participation processes where applicable.
395		Precinct 11. East City. Project 076. Should not be implemented.Adequacy of the mobility plan would depend on whether the proposals are inclusive and backed by community engagement.	East City raises concern re Project 076	Thank you for your comments. No projects, including in the East City, will proceed without their own detailed design and public participation processes. Project packing will proceed with public participation processes where applicable. Project 076 Harrington Square implementation includes participation in the scope of work.

396	Dave Blackmore (The Harri Body Corporate)	The Harri owners have not been notified or consulted regarding the possible changes to parking in and around Harrington Street . Should the city decide to go ahead with the proposal, it could have dire consequences for the revenue stream to unit owners, which a majority operate short-term leasing via Airbnb and other platforms. Many of the guests are international tourists who make use of Hire cars due to the lack of reliable public transport and often go on daytrips to the surroundings of Cape Town. Should there be no parking available, it would drive guests away to other venues where they can park near the location of their accommodation. This would also affect businesses close by that would have to close down, and effectively turn the area into a ghost town. People are afraid to park far from their venues due to safety and security factors for themselves and their cars. Should this proposal go ahead, it could effectively turn the Harri into an inner-city slum as owners would be desperate to generate any possible revenue to maintain their bond payments. Who will compensate the owners if the value of the properties drop?	More consultation needed re localised projects.	Thank you for your comments. Any interventions in the East City would be timed so that the benefits outweigh the costs, including to local businesses, due to densification and development in the area. No projects, including in the East City, will proceed without their own detailed design and public participation processes.
397		East City Precinct, Harrington Street We do not believe these plans are NOT implementable as no consultation with owners and affected parties has taken place. The city needs to engage with affected parties on an in-person basis so they can clearly spell out what they are trying to achieve and take into consideration what the effective parties have to say.	More consultation needed re localised projects	Thank you for your comments. Any interventions in the East City would be timed so that the benefits outweigh the costs, including to local businesses, due to densification and development in the area. No projects, including in the East City, will proceed without their own detailed design and public participation processes.
398		The City needs to Consult In detail with affected parties. We do not fully understand the plan, and more consultation needs to take place. THE CITY NEEDS TO HAVE MEETINGS WITH THE AFFECTED PARTIES AND TAKE INTO CONSIDERATION ALL THEIR COMMENTS BEFORE ANY IMPLEMENTATION CAN TAKE PLACE	More consultation needed re localised projects	Thank you for your comments. Any interventions in the East City would be timed so that the benefits outweigh the costs, including to local businesses, due to densification and development in the area. No projects, including in the East City, will proceed without their own detailed design and public participation processes.
399	dominic conradie	Thank you for the opportunity to provide input on the LSDF. I support the City's broader vision of a more accessible and sustainable CBD. However, I would like to highlight a few practical concerns—especially relating to the proposal to remove on-street parking and rely more heavily on non-motorised transport such as cycling. • Misuse of Existing Cycle Lanes: Many of the current cycling lanes are not respected. They are regularly blocked by taxis, ride-hailing services, and delivery vehicles using them for drop-offs, parking, or loading. This makes them unsafe and unreliable for cyclists. • Enforcement is Absent: Metro and traffic police rarely act on these violations. In many cases, officers drive past without intervening. If enforcement of existing infrastructure is already lacking, this raises concerns about how shared streets or additional cycle infrastructure will be managed in future. • Motorist Awareness is Low: Many drivers do not understand cyclists' rights or how to safely share the road. This creates daily risks for people who choose to cycle and further discourages the shift toward alternative transport. • Public Awareness Campaign is Needed: The City should consider a campaign to educate motorists on cyclists' rights and responsibilities, encouraging safer, more respectful road-sharing. Without this, new infrastructure may not be used effectively or safely. • On-Street Parking Remains Essential: Until cycle infrastructure is protected and trusted by the public, and until public transport alternatives are consistently reliable and accessible, removing on-street parking—especially in the East City—will likely harm local businesses, reduce accessibility, and set back the area's progress. People need safe, convenient options to access services and businesses. Right now, cycling is unfortunately not a consistently safe or viable substitute.	Cycle lanes misused Lack of enforcement Cycle awareness needed Concerns re possible reduction of on-street parking	Thank you for your comments. As next steps include both an Operational Plan, and a Parking Plan, which are intended to study these issues in greater detail.

400	Debbie Smuts	Our store, 46A Canterbury St, is a vital part of our charity where income is generated by selling donated gently worn clothing. We have worked very hard for the past 2 years to generate awareness and create awareness about the store. Shoppers who are eco-conscious and those who just love a bargain drive in from all over Cape Town and afar to support us. We also rely on drive past traffic, who notice our bright pink wall, park and come to shop. We are not on the side of a busy street where there are 100's of shoppers and feet passing our door all day. We need our shoppers to be able to park and shop. Our store brings in 60% of our turnover for the 8 major education charities we support. We cannot afford to reduce our turnover because our regular shoppers from around the city and suburbs can't park close by to our shop. This area is also heavily exposed to summer winds and winter north west storms, so customers need to be able to park close by. We employ 4 permanent employees in our shop who cannot afford to lose hours due to less turnover. On behalf of Vintage with Love I would like to invite you to our store so that you can observe for yourselves how pedestrianizing this area would be devastating for us. Alderman Andrews has witnessed the work we do at our Big Sale at the Cape Town Cruise terminal where we raise 20% of our monies which we donate to literacy charities. Good Hope Literacy being one of them.	Concerns re possible reduction in street parking	Thank you for your comments. Any interventions in the East City would be timed so that the benefits outweigh the costs, including to local businesses, due to densification and development in the area. No projects, including in the East City, will proceed without their own detailed design and public participation processes.
401	Wayne Keet	As the owner of saloon, I receive several deliveries per day. I also have 3 vehicles which park inside my saloon after hours. Each day at the beginning of trade, they are parked outside in the street until closing. I am therefore highly against the removal of any street parking.	Concerns re possible reduction in street parking	Thank you for your comment. A next step for this project is a detailed CBD Parking Plan, which will explore the parking needs, and potential options to meet those needs, in the CBD. Any specific projects will also involve more detailed examination of the particular needs of that area.
402	Victoria Keet	As a resident, I am highly against the removal of all the parking in the area. My vehicles park in the street outside my building and so do my visitors. Where does the city suggest myself and other residents in our building park our vehicles?	Concerns about possible reduction in on-street parking in East City	Thank you for your comment. A next step for this project is a detailed CBD Parking Plan, which will explore the parking needs, and potential options to meet those needs, in the CBD. Any specific projects will also involve more detailed examination of the particular needs of that area.
403	Mai Conradie	Herewith relating to Volume 2: Cape Town CBD LSDF and annexures Annexure B, I hereby object based on the following: - Over the past few years areas of the city has seen a massive uplift due many restaurants, coffee shops and retail businesses opening their doors. It has created safe and clean environment for us residents who reside in the city. As a resident, I am able safely cycle and walk to my nearest coffee shop during working hours without fear. By removing all the parking in the mentioned streets of Cape Town, businesses will have no choice but to close their doors as they will be no customers - This in effect will cause the streets of Cape Town to deteriorate again and no longer be safe for us residents. - Whilst a car free zone is a great initiative, as an avid cyclist I would no longer feel safe to cycle the streets of Cape Town should all these businesses close their doors. Yes, the city has created cycle lanes through some of the streets in Cape Town, however these are mostly occupied by Taxis, E-Hailing vehicles and Delivery vehicles making it dangerous for cyclist to use therefore we cycle in the road with the vehicles.	Concerns about possible reduction in on-street parking in East City	Thank you for your comment. The CBD Mobility and Access Plan is designed to improve the CBD for all users, including pedestrians and cyclists like yourself. No projects would proceed if they threatened to economically devastate an area; each project would be timed and designed so that the expected benefits would outweigh the costs, including to local businesses. "Eyes on the street" are an integral part of pedestrian, cyclist, and motorist security, and so are lively activated streets.
404		The proposed removal of all on-street parking within our precinct—specifically along Harrington, Albertus, Constitution, Barrack, and Canterbury Streets—represents the most far-reaching and consequential change we have faced since the COVID-19 pandemic. As per the City's draft proposal the district has recovered faster than expected. We believe that we were able to leverage the unique and complex mix of businesses that all work together. A sweeping change to the way visitors access the precinct without fully understanding it's impact can reverse all the progress we made.	Concerns re on-street parking removal within - specifically along Harrington, Albertus, Constitution, Barrack, and Canterbury Streets	Thank you for your comment. A next step for this project is a detailed CBD Parking Plan, which will explore the parking needs, and potential options to meet those needs, in the CBD. Any specific projects will also involve more detailed examination of the particular needs of that area.

405		We acknowledge and support the City's commitment to sustainability, inclusivity, affordable housing, and green public spaces. We also share your goal of reducing reliance on private vehicles. However, our economic recovery remains fragile, and any major interventions must be implemented with caution and an understanding of local realities.	Agree with LSDF's visions and base principles Caution implementation of European concepts without testing and experimentation	Thank you for your comments.
406	Roni Sha'altiel	We are concerned that while the proposed plan presents an aspirational vision, it does not adequately address the real-world risks of implementation or potential unintended consequences. Our key concerns include: • Operational Logistics: Several businesses (e.g. KBAC, Namaqua Trading, Get Wine, Plantify, Woodheads) operate as depots and dispatch & receive deliveries by delivery vehicle throughout the day. These functions are incompatible with the rigid constraints of a shared-street model. • Destination-Based Trade: Legacy establishments such as Charly's Bakery, Diaz Tavern, New York Bagels, the Fugard Theatre, the District Six Museum, and Woodheads attract visitors from across Cape Town and beyond. Many of these visitors plan multi-stop trips and depend on short-stay on-street parking. One doesn't consider fetching a bespoke cake from Charly's on foot or in a MyCiti bus or perhaps cycling to the theatre to see a show! • Family Mobility and Safety: Parents with small children attending Stepping Stones Pre-school rely on nearby parking for drop-offs, pick-ups, and late-day meetings. Likewise, patients at the District Six Community Clinic—many of whom are elderly or have mobility issues—are frequently taken and collected by family members who require safe, close, and accessible parking. • Visitor Accommodation : Local hotels, such as the Hemp Hotel, were developed under the assumption that on-street parking would be available for guests arriving with rental cars. This change can jeopardise the viability of these large and long term investments. • Events and Tourism: Large events such as the Absa Run and Slave Route Challenge attract thousands of participants. Streets like Harrington have long served as informal parking zones for runners from suburban areas. The complete removal of parking will compromise the ability to host such events. • Film Industry: Harrington Street, is an unusually wide street and combined with Harrington Square which is used as a base camp, is a prime location for the film Industry and during the summer months generate income not only for Film Companies but for many other businesses in the form of location and catering fees. We cannot afford to lose this substantial revenue stream. • Employment and Business Viability: The removal of all on-street parking in one sweep will place severe strain on the hospitality and retail sectors. Many businesses rely on impulse visits and convenient access. We are convinced that a sudden drop in foot traffic will lead to closures—placing hundreds of jobs at risk and reducing the district's diversity and vitality. In summary, these changes risk triggering a substantial drop in trade, visitor numbers, and local vibrancy. Tourists are drawn to the East City because of its authentic, diverse, and lively local community. If the very people who create that vibrancy are forced out, tourist number would inevitably plummet. Sadly, people don't walk past the East City.	Concerns relating to possible loss or reductino of business parking areas for loading and delivery as well as visitor parking bays (on street). Especially Harrington Sq and Str play a variety of important roles in the local economy.	Thank you for your comments. Any interventions in the East City would be timed so that the benefits outweigh the costs, including to local businesses, due to densification and development in the area. No projects, including in the East City, will proceed without their own detailed design and public participation processes.

407	In light of the above, we respectfully request that the City: 1. Engage with Stakeholders to develop acceptable alternatives e.g. retaining on-street parking on at least 70% of Harrington Square, of which the next public participation is due soon (as well side streets up the Buitenkant Street) if Harrington Street were to become a shared Street. As it stands, the current proposal makes no provision for replacement/large depot parking. 2. Provide a clear public rationale for adopting the "woonerf" (shared street) model, including comparative examples from cities with urban, social, and economic conditions similar to Cape Town. 3. Provide clarity about where commuter's cars would be parked on the periphery of the "woonerf" area. One can agree or argue that certain streets are destined for sharedstreet model, IF and only IF there are parking spaces made available nearby. 4. Host an in-person consultation with East City businesses, residents, and stakeholders before final decisions are made. 5. Pause implementation until a detailed, quantitative impact assessment is conducted—especially in terms of business continuity and commuter access. 6. Develop a phased or pilot implementation of the plan, allowing live testing, realtime feedback, and iterative refinement based on actual outcomes. This is not simply about the loss of parking. It is about adapting urban planning models—developed in compact, temperate, high-income Northern European cities—to a South African context marked by geographic sprawl, seasonal extremes, and underdeveloped public transport.	East City residents and businesses raise concerns re woonerf and request separate engagement.	Thank you for your comments. Any interventions in the East City would be timed so that the benefits outweigh the costs, including to local businesses, due to densification and development in the area. No projects, including in the East City, will proceed without their own detailed design and public participation processes. Separate engagement were faciliated in May 2025.
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