

Cape Town CBD Local Spatial Development Framework - 60 Day Publi participation comments and responses (Octbober 2024)				
ITEM No.	ORGANISATION TYPE (line department)	COMMENT	SUBJECT	RESPONSE (to be publicly published)
1	Recreation and Parks	Company Gardens (Regional Park) – Environmental and Heritage Management Department currently reviewing CMP in order to address management/maintenance issues re Heritage buildings and graded sites. Requiring tenders with specialised skills etc.	Company Gardens	No amendments to document other than considering what can be acknowledge in Implementation Plan
2		De Waal Park +Molteno reservoir – included as part of Departmental Regional Parks Programme (first quarter of FY 25). In addition the site (lower Molteno reservoir) is also identified by Water and Sanitation to establish a Water Education Centre – status of this project is unclear.	De Waal Park & Molteno and other water educatoin centre locations	No amendments to document other than considering what can be acknowledge in Implementation Plan
3		CBD Beautification (includes Landscaping and/or Treeplanting): R5mil 24/25 FY. Areas include major entrances to CBD; Hertzog Boulevard and DF Malan Street.		No amendments to document other than considering what can be acknowledge in Implementation Plan
4		The CBD (study area) includes Regional Parks (as mentioned above) and the remaining parks are all classified as neighbourhood parks .	Classification of parks Regional vs neighbourhoods	Update drawings & legends
5		The Recreation and Parks Area Plan currently being prepared and will address facility provision, park categories and programmes, investment priority spaces etc.	Recreation and Parks Area Plan	No amendments to document other than considering what can be acknowledge in Implementation Plan
6		Road verges with minimum width of 1.5m required for street tree planting and no underground services. Most available space within road verges have trees, however, any new tree planting routes would be supported. At present the department attends to replacement of street trees where necessary.	Tree planting plan?	Include in Development Guidelines for final LSDF
7		Tuin Plein Park now managed by the new CID with plans to beautify the space and replace vandalised fencing. The parking lease also no longer exists. The City is still busy with the evicition process in respect of vagrants that have occupied the site.	Tuin Plein Park plan?	Final version of LSDF to be updated if required
		It is noted that public toilets have not been mentioned in the report. The following squares contain public ablution facilities:	Public toilets Strategy? Thibault, Riebeeck & Greenmarket SQ?	Final version of LSDF to be updated if required
8		Thibault Square : Facility is located in a private building whichcomplicates the	Recreation and community facilities	Final version of LSDF to be updated if required
9		Mobile toilet initiatives in the CBD have been launched as a mayoral project: • R1.4mil (24/25 FY) allocated to mobile toilets in Long Street, Adderley Street and Home Affairs vacinity. • There are no standards to apply in respect of the provision of public toilets. However, the need for this project may be indicative of a shortfall.	Mobile toilets initiative	Final version of LSDF to be updated if required
10		Film shoots: Note that the tariff for film shoots have been removed (insofar as it relates to the use of City owned facilities managed by this department). This is considered a loss of income that could have been used to maintain facilities at a possible higher standard. Facilities often not available for rental, depending on the level of use by film companies.	Tariffs on film shoot	Final version of LSDF to be updated if required
11	Some terms are loosely used and could cause confusion. Alterantive referencing and clear definitions should perhaps be used. Following terms cause confusion and/or don't align with departmental referencings. This could be discussed in further detail: - Public Space vs Public Green Space . It may be best to refer to a park as a park in lieu of public green space. Other public spaces such as public squares could also be referred to as such. The referencing has direct management implications. Public squares and outdoor “malls” (such as St Georges Mall) are generally hardend spaces that serve as pedestrian movement or through routes. They may have greening such as tree planting but they are not public parks. Public squares and outdoor malls are (and/or should be) generally managed by the Transport Department. Recreation and Parks would manage/maintain the trees only. - Recreation: This term is used on occasion in the document but it is not clear if this refers to a formal sports ground (i.e. formal recreation) or perhaps a park (catering for informal recreation). This too would have different management approaches	Terminology not aligning PS vs Pgreen Space vs POS vs recreation	Final version of LSDF to be updated if required	
12		In general, the maps are still quite ‘busy’ with lots of information and should be simplified where possible. Please note E&HM's specific previous comments with regard to problematic legend items and map issues (provided in text documents).	Maps too busy and legends do not aling/ difficult to read	Final version of LSDF Doc and Maps to be updated if required
13		Some of the transport-related proposals, particularly the emphasis on pedestrian improvements, are far-reaching and exciting . E&HM is strongly supportive of this approach to create a more balanced and liveable CBD.	Some pedestrian proposals are far-reaching	No amendments to document
14		It is not clear to what extent infrastructure capacity has been taken into account in relation to spatial proposals . There is also little reference to green building imperatives etc.	Infrastructure capacity is unclear	Add a part on the quantification and that the outcomes of early investigations on infrastructure capacity was fed through Engineering Line Departments and absorbed in the implemenation plan

			No amendments to document. Suggest this is linked to incentives /Tall Building Policy Reivew Process which will start in the future	
15		As noted in engagement with LUMS (meeting 25/10/2024), the documentation should provide clear and easy reference to relevant directives and guidelines that would be applicable to a site. In this respect, the graphics (maps) should be checked to accurately align with text directives, for example relating to height provisions to avoid ambiguity and discrepancies.	Development Guidelines shoulg go down to site level (that is debatable)	Site specific guidance may not be achievable and appropriate in this LSDF. Final LSDF will note this input
16		The ongoing interaction with LUMS is likely to influence some of the spatial proposals with regard to alignment with 'existing base rights' . It is again reiterated that the purpose of the HPOZ, which covers a large extent of the study area , is to determine an appropriate built form and spatial character that should be informed by impact on significance (of the place) and not only development rights . The LSDF is a spatial policy that should set out an appropriate vision based on the greater public good.	LSDF as tool vs HPOZ a tool to be clarified	Development Guidelines in the LSDF will be updated. Other elements will be routed to the Development Guidelines for the Heritage Management Plans or the Municipal Planning By-Law Overlay Zone Review process
17		Insufficient recognition of concept of character areas. As the basis of original CCDS work, this concept should inform the development intent. This relates to spatial proposals, e.g. introduction of additional height in various areas, where this does not always relate to the overall character. Also character areas should be introduced into section 5.4, to form part of the underlying logic of the framework.	Main heritage and character-related concerns	Add character to section 5.4
18		Lack of recognition of historic core in spatial proposals. The basis for character-led planning should be protection of the core, with more flexibility elsewhere. This relates mainly to the introduction of a range of heights.	Historical core and precincts not adequately recognised	Subject to onging parallel work which will be incorporated as Development Guidelines in the LSDF vs the HPOZ MP vs the MBPL-OLZone
19		The introduction of a range of heights rather than clear maximum remains a concern. Although the motivation stemming from a 30% increase related to a residential use incentive is noted, it needs more specific criteria against which to assess applications and potentially allocate the additional bulk . The E&HM analysis and subsequent indicators were premised on character, streetscape qualities, built form, heritage resource protection, distinctive building clusters etc. The blanket increase of the upper height limit, without taking all of the above into account, is problematic . The applicability of the incentive should be clarified as should further design criteria for additional height, for example the requirement for setbacks above a certain datum. This is related to the street widths which are narrow in the historic core and where inappropriate heights would have a detrimental impact on streetscapes. Conflict between height limit stated in text vs maps is confusing; it discounts the whole notion of certainty.	30% increase vs incentives	Subject to onging parallel work which will be incorporated as Development Guidelines in the LSDF vs the HPOZ MP vs the MBPL-OLZone
20		Very tall building cluster south-west of Strand Street not supported. This is out of keeping with the intended character consolidation; visual impacts on mountain backdrop from scenic drive (a primary informant of initial concept). Strand Street is the defining line between historic core and modern part of city where taller buildings are more appropriate.	Gateway heights questioned	The precinct height map will be removed as level of detail cannot be reconciled at this scale. Also note the LSDF does not give or take-away rights.
21		Height range from 60-72m in historic core areas. Upper limit here should be retained as 60m.		Precicnt 7& 8;.this aligns with the 'base rights', but there is still an exception for the Strand Adderle Gateway
22		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.		Global height map: note recommendation on spatial proviso's. Suggestion to Link height to FF
23		Height range up to 32m as setting to Long Street. Should be retained as 24m.		Precinct 7- subject to ongoing work
24		Height range up to 32m as setting to Napier Street. Should be retained as 24m.		Precinct 5 - subject to ongoing work
25		Gateway proposals: height to be checked re recent approvals, not blanket 60/ 72m provision. Height should taper towards Foreshore. Inclusion of affordable housing as condition. 90m height not supported. Block 28 has been approved as 40m/ 12 storey height and this should be included.		Incorporate guidelines in the LSDF GD or HPOZ HMP GD or draft MPB-L GD
26		Contour-led approach should be qualified, also including reference to streetscape and other contextual attributes as additional infomants. Need for a more clear summary paragraph on overall height approach, skyline etc. Outdated skyline drawings are misleading as increased height is now introduced in various places.		Incorporate guidelines in the LSDF GD or HPOZ HMP GD or draft MPB-L GD
27	Environmental Management: Environment and Heritage Management	Insufficient recognition of Buitengracht as scenic drive and one of few existing greened linkages.	Buitengracht as scenic drive	Note - review greened linkages along Buitengracht. Which aspects of the Scenic Drive should be highlighted?
28		Some views and vistas have not been considered, e.g. view from the Castle of Good Hope as an iconic and highly signigicant heritage place.	New view to be considered	Include where relevant in the development guidelines in the LSDF GD or HPOZ HMP GD or draft MPB-L GD -

29	The content of Annexure A is noted, with 3D representation of heritage indicators put forward by E&HM, based on the preceding heritage analysis work. These diagrams however require a legend, particularly as the colour coding related to heights, differ from the height bands in the main document. Areas where LSDF proposals deviate from heritage indicators should be clarified in document and reasoning included. Areas where there is no agreement on spatial proposals, should be further discussed prior to finalisation of the LSDF , as the spatial plan is to form the basis for further HPOZ provisions to be drafted as a Heritage Management Plan and conflicting must be avoided.	Annexure A	Annexure A comment note. Maps authored by EHM - please update so they can be added to Annesure A.
30	p10: It is stated that the residential growth estimates are 'highly conservative, and can easily be increased by up to 300% (22 506 new residential units)'. There is no explanation as to how this figure (the 300% increase) was arrived at. Given that this translates to the need for acommodation for 40 000 and 50 000 more people by 2040 as a potential new demand, more clarity is needed on the basis for these figures. If these numbers are the basis for all further planning, a clearer explanation of the calculation methodology is required.	Specific comments on text re growth options to be updated	Update this part of the LSDF Document with more recent information
31	P11 (S3.1.3.): '...while implementing considered heritage protection guidelines for heritage resources and clusters of real significance.' Omit ' real '. All identified (graded) heritage resources and buildings in the CBD are significant to various degrees. Also include the protection of scenic qualities related to the setting between mountain and sea.	Omit the word real and update the text	Note textual changes /corrections to be included.
32	P15 (S3.3): Point 9 (included in Vol 1 Contextual Synthesis report) is missing.	Clean up numbering of Vol 1 Doc	Note textual changes /corrections to be included.
33	P22 (Fig 4-4): As previously noted, stronger reference to heritage resources, sense of place and special clusters is required. The reference to historic transport routes is not a strong conceptual informant that needs to be included at this level.	Stronger reference to heritage resources and clusters required	Agreed, this was subsequently confirmed in a City led cross discipline cultural mapping (14 November 2024) workshop, that in hindsight the tramway isnot a suitable contemporary informant and hence will be removed.
34	P26 (S5.2.6): As part of establishing appropriate edge conditions to Grand Parade, also prioritise improved pedestrian connection to the Castle and beyond to also include Good Hope Centre as part of a civic precinct.	Pedestiran movementa round Castle	Agreed, emphasise in drawing
35	P49 (S5.2.6.) Include Buitenkant/Castle Street and Darling street adjacent to the Grand Parade in the list of 'street carpet' treatment areas, as per the approved Grand Parade framework.	New street carpet areas	Agreed, emphasise in drawing & add to implementation
36	P71: 'Properties with a GB7 and MU3 base zone in the CBD are permitted a maximum height of 60 metres', include subject to HPOZ approval.		Note textual addition for clarification
37	E&HM previously provided a 'Powerpoint' overview with highlighted corrections still required, including e.g. Minor additions to vision, concept drawings etc, as previously pointed out. <u>Clarity regarding intensification hatching (what is the basis for this?)</u>	outstanding corrections	Struggling with response
38	See updated section 5.4 in edited document - table on significant heritage clusters and open spaces. Corrected numbering to be added to maps. Also corrected terminology to <u>differentiate between heritage clusters and other areas identified.</u>	further work required	Struggling with response
39	Include character areas map and descriptions in this section.	Character areas	Struggling with response
40	Recognition of Buitengracht as Scenic Drive – i.e. include on concept drawings for adjacent precincts	Scenic Drive	Noted for inclusion. Clarificaiton on relevant Scenic Drive Policy points that apply in relation to Buitengracht and the freeway
41	All remaining E&HM comments previously provided on text and in submissions which have not yet been considered	Issues still to be debated and resolved:	Struggling with response
42	3D testing of remainder of height range impacts (other than those highlighted as main concerns)– street cross sections within historic core and sensitive areas.	3D modelling for height	3D model combined with Heritage Consultant working in parallel process to determine development guidelines
43	Clarity on maximum height between Strand & Riebeeck (60m+ vs 90m) – Design criteria?	Height	3D model combined with Heritage Consultant working in parallel process to determine development guidelines
44	The intention to continue work on the possible amendment of the Local Area Overlay Zone of the CBD is noted. E&HM's view is that this LSDF should form the spatial policy basis for such a revision and that its approval should not be delayed.	Overlay Zone review	Not change to LSDF other than including Development Guidelines from parallel process
45	Correction of (EHM) landmark layer. Further guidelines and 3D analysis for significant heritage clusters and open spaces.	Further E&HM work to be considered	Details to be clarified and determine if new updated Vol 1 maps not adequate
46	E&HM has provided detailed comment on the document prior to the public engagement phase. It would appear that much of this has not yet been considered or incorporated. We would like to request the opportunity to again provide a subsequent comment on the text (as per the latest draft), specifically in relation to heritage aspects.	Future comments may still come on heritage matters	Noted
47	In addition, further engagement with the drafting team is requested with respect to 'areas of conflict', as raised in previous discussions. This is particularly important given E&HM's ongoing work to draft a Heritage Management Plan in relation to the HPOZ, which covers a large extent of the study area.	Rrespect to 'areas of conflict'. Work with hotspot list and resolve.	3D model combined with Heritage Consultant working in parallel process

48	District Planning and Mechanism	I am pleased to see Old Marine Drive and the Paul Sauer precinct (next to Cape Town station) has been acknowledged in the LSDF as an area for improvement. I would just like to reiterate that the section of Old Marine Drive outside the Cape Town Train station is hugely problematic . The road is wedged between the station and Paul Sauer building and parking lot owned by Transnet. The parking lot acts as a hard edge and it's barely used. It severely prevents movement and flow of pedestrians coming out of the station. People are thus funneled down Old Marine Drive which is a one way road, with a narrow pavement only on the one side and car parking on the other. Very dangerous since pedestrians, cars and informal traders fight for space. And there's a lot of pedestrians who use that road since it's near the large train station and long haul bus station. While that area is still being under investigation for development, a quick win that can improve pedestrian safety is shifting the short green fence around the parking lot backwards by about 1m. This will free up a lot of space on the currently overcrowded pavement.	Old Marine Drive and Paul Sauer for improvement but focus on part outside the station.	Support for Old Marine and Paul Sauer Active mobility & access conceptual approach. This is subject to continued work (implementation)
49	Human Settlements	2.1 Policy and Strategy Integration - SPE to indicate whether there is a need for further detail of this policy to be shared at this stage of the LSDF process.	Affordable Housing Policy (Draft)	Verify Affordable Housing Policy status for inclusion in LSDF
50		3.1.2 Accommodating demand inclusively - It would be useful to utilize existing overlay zones/Inclusionary overlay zone to manage short term rentals and avoid a further challenge for residents to afford open market rentals in the CBD. Furthermore, the City should commit to gaining more data on Airbnb usage in the CBD, and do further research into its impact on the CBD property market – with a particular focus on how it affects the rental sector. Based on the findings, the City could consider whether there are further appropriate mechanisms to put in place to respond to any distortionary affects that Airbnb might have on the CBD property market	AirBnB policy statement?	Obtain policy statement from Corporate Office and include in document
51		5.3 Public land development - In addition to the government projects map, an updated Affordable Housing – Existing and Housing Pipeline Map is included in Annexure A.	Government projects	Include project pipelines on IP Maps
52		Key government sites should maximize affordable housing responding to context – sites in different precincts - Key government sites should include affordable housing opportunities – this should be in collaboration with provincial, national and SOE land where affordable housing is suitable.	Precinct Development Guidelines	Obtain policy statement from Human Settlements Department and include in document
53		6.1.3 Economic Growth Strategy - Utilize UDZ/Proposed Inclusionary Housing Overlay Zones to incentivize investors and developers to include affordable housing in their developments.	Investment promotion	3D model combined with Heritage Consultant working in parallel process to determine development guidelines
54		HS to play an oversight role on the land release for affordable housing in the CBD.	Strategic land release - confirm projects	No change needed to document as implicit in role for HS department
55		Thank you for incorporating some concepts of green infrastructure (GI) within the draft CBD LSDF. Although there is reference made to the green environment, it is felt that this can be elaborated on. Whilst the CBD is highly urbanised and has little 'natural environment' left within it, natural elements that do exist (such as trees) need to be retained and enhanced upon, and opportunities for developing new green infrastructure sought, in order to enhance liveability in the CBD and help provide resilience to climate change impacts. Cape Town has a strong water history – it is proposed that this should be celebrated within the CBD. There are many ways this can be expressed and integrated into the CBD, and the resource utilised (e.g. underground water could be harvested / day-lighted for use in water features, or used for non-potable purposes in buildings). It is encouraged that this be explored. The concept design proposal for the Heerengracht precinct, is one such example that should be considered. It is encouraged that the City's natural assets, resources and environment be discussed as a sub-section to the public realm, considered within all proposed precinct development areas, and considered as a key structuring spatial element.	General comments	Add recommendation referring to natural assets, resources and environment to be added to public realm, with some restructuring required.

56	It is fully supported that public spaces with greening will be needed to provide some relief from the intense urbanised built form of the CBD. It is encouraged that the natural environment be a sub-section of its own within the public realm sections of the CBD LSDF, where guidelines and principles for the inclusion of the natural or green landscape could be further explored.	Restructuring the use of the public realm (for the pedestrian) – Page 12	Include stronger guidelines on public spaces with greening combined with public realm
57	The tree planting strategy that is proposed in relation to mitigating heat island effect is supported. It is encouraged that this become both a tree and vegetation planting strategy, which then could also encourage green roofs and green/ vertically planted walls. The incorporation of water into the urban environment, via water sensitive design and SUDs approaches will further assist with heat mitigation and create a more liveable city environment.	Spatial constraints – Page 14	Update the strategy wording to include tree and vegetation strategy and other green concepts
58	It is proposed that the following amendments to the vision be considered in support of the acknowledgement for the natural landscape of the CBD (additions underlined): "A bold action-orientated plan to leverage the uniqueness, diversity and natural and cultural landscape of Cape Town CBD to realise its transition into a reimagined world-class, people-centered (less car-dominated), climate resilient and mixed use environment which:..." "3. Facilitates sustainable, resilient economic growth and investment while celebrating the social, cultural and natural landscape qualities of the City bowl. "	Vision – Page 18	Add natural landscape to vision
59	Within section 3.2, the LSDF recognises the importance of tree planting as a way to combat the heat island effect. It is proposed that this notion be further explored and reinforced within the main spatial ideas section. To promote the retention and enhancement of tree canopies /increased urban green in the CBD will assist with reducing the effects of climate change and make it more liveable. For example, promote green roofs/ roof gardens and green walls/ vertical planting in developments, as well as tree and vegetation planting, and the incorporation of water elements into design (for example as has been done at Merriman Square, as well as proposed for the Heerengracht).	Main Spatial Ideas – Page 21	Suggestion to be reviewed by asset owners
60	It is also supported that a main spatial idea should stem around enhancing the mountain to sea connection. This connection should be further reinforced, with emphasis put on the importance of creating and reinforcing green links between the mountain and the sea. The Green Infrastructure Network could also be considered, which has potential corridors identified, and be used in conjunction with links already proposed.		Consider if Doc and Maps should be upgraded after comparing existing documentation with GIN. Update information in Vol 1.
61	Though it makes sense to combine both the public realm and natural environment as main spatial idea 1 – it is proposed that the green landscape/natural environment and public realm to be viewed as main spatial ideas on their own, or separately, as there is a lot to <u>unpack regarding green space within the CBD.</u>	Green landscape/natural environment and public realm to be viewed as main spatial ideas on their own	Noted. This section presents the main spatial conceptual ideas to be held 'at a glance'. This does not negate or preclude the importance of separate contextual layers.
62	Proposed new spatial idea could be: Idea – "A natural landscape linking mountain to sea"	Link mountain to sea	Consideration will be given, but not expecting change
63	Correction/ Omission: Please note, idea 5 in Figure 4.4 'Retrace and restore historic transport routes through places of memory' has not being added as a sub-heading to the main spatial idea text section.	Idea 5 in Figure 4.4 'Retrace and restore historic transport routes through places of memory' has not being added	Subsequently this idea will be removed. A City led cross disciplinary cultural mapping workshop was held. (14 November 2024). In hindsight the historic tramway is not a suitable contemporary informant for current mobility & access planning (in light of the IRT routing) and contemporary destinations and placemaking are not necessarily dependent on this routing either. Hence this <u>will be removed as a main spatial design informant.</u>
64	Apart from what has already been mentioned as critically important given the context and developmental need,the protection and enhancement of the green/ natural environment should also be considered as a key design informant in Section 5. Mixed-use intensification or any new and existing developments should be done in a manner that does not deteriorate the green/ natural environment/landscape, and where possible, enhance the urban green.	Spatial development framework - page 23	Incorporate suggested emphasis in Sec section 5. Also note the LSDF does not give or take-away rights
65	It is encouraged to elaborate on how the intense built environment should work in harmony with the green/natural environment in the CBD LSDF. Blue and greenspaces <u>should be acknowledged as they meet the human needs for health and wellbeing.</u>	Balance between building intensity and green/ natural environment	Include statements in the DGs in LSDF, HPOZ MP, MPB-L O/Zone
66	All the aspirations and spatial ideas for the CBD should be met in a manner that does not deplete Cape Town's natural capital, and where possible enhance.	Protection of natural assets	Do not envisage major changes
67	Although the mountain to the sea link is recognised, the relationship between the CBD and Table Mountain National Park (TMNP) should be enhanced further. It is noted that aside from a point in Section 6.1.3. relating to the cableway, there is no other mention made of TMNP or SANParks. A reminder that such linkage ranges from green belt linkages to <u>ensuring visual access to the Park.</u>	Relationship between the CBD and Table Mountain National Park (TMNP)	Note textual changes /corrections to be included.

68	Environmental Management: Environmental Planning & Sustainability	The green/natural landscape should also be included as an element/design informant of the public structure. Green / natural assets and resources should be identified and incorporated into new developments (project proposals) through the use of green infrastructure. These are fundamental element of the public realm as it encourages spaces <u>that are healthy, desirable and adaptable to climate change.</u>	design informants - page 24	Consider if Doc and Maps should be upgraded after comparing existing documentation with GIN. Update information in Vol 1.
69		It has been mentioned that the public realm will promote a mountain to sea link. However, this link has not been further explored within the public realm structure. Green spaces and squares have been considered, but it is important to mention other elements (e.g. water and trees) and how these can be incorporated further.	Public realm structure - page 25	Highlight the 'mountain to sea concept' in the public realm structure drawing
				Implementation plan to incorporate further research and projects incorporating elements of surface water, tree planting and SUDs
70		Currently, the CBD has little vegetated areas due to its harsh urbanised form. However, in the embedded concept map, quite a few green spaces and important green living streets are highlighted. How these green elements/natural assets can be further enhanced so as to allow the CBD to become more green and liveable, should be considered.	Greening the CBD	Changes will have to be made incrementally as quit pro quo due to enhanced rights process
71		The green link of mature trees has been acknowledge through various streets within the CBD LSDF. Retention of existing trees within the CBD should be a priority, with additional planting emphasised. The CBD's urban forest should be further acknowledged and enhancement explored. Urban forests can be seen as a nature-based solution for climate change (from both mitigation and adaptation perspectives) and for other social-environmental benefits in the CBD. Trees and other vegetation have important mental health and performance benefits. Local tree canopy cover is positively associated with cooling and other aspects of climate moderation. The value of treed streets from an economic perspective has been demonstrated.	Greening the CBD	Include urban forest (retention and expansion of existing trees) in development guidelines
72		Optimising and increasing green spaces in the CBD is critical. Incorporation of water (e.g. as part of SuDS or features) into these spaces too will provide added benefit and also assist with cooling. Quality public greenspaces in proximity to one's home/work promotes nature connection, which results in positive impacts on mental, physical and social health.	Optimising green spaces	Include optimisation and increase in green space in development guidelines
73		It is encouraged that the use of water in public and private spaces be further explored within the precinct priority structuring ideas and development guidelines. The value of water and greening in the urban environment, making it more liveable, is demonstrated at Merriman Square (Food Lovers Market/ Standard Bank Towers). The use of underground water, for non-potable uses in buildings that are developed, should also be considered <u>and investigated</u>	Use of water in Open Space	Include the use of water in pulic and private spaces in development guidelines
74		Within section 5.1.3, an emphasis should be put on the importance of creating and reinforcing green links between the mountain and the sea.	system based public structure - page 29	Noted
75		It is proposed that the incorporation of green infrastructure within the design of NMT routes be encouraged. This will further stimulate the mountain to sea connections as it allows the natural environment to work cohesively with the intense built environment of the CBD.	Greening the NMT	Include the green infrastructure within design of NMT routes as part of development guidelines
76		It is also encouraged that use of SUDs and/ or daylighting of water for use in water features be explored, where possible, and that the retention and enhancement of tree canopies / increased urban greening be further investigated within the various systems.	SUDs	Include the SUDs in development guidelines
77		It is proposed for consideration that the incorporation of green infrastructure principles and elements be included within the design of new mobility routes. Impacts of climate change, especially increased heat, should be considered and appropriated mitigated against by consideration of incorporating shading and other aspects (e.g. water availability) at terminuses/ PTIs, as well as via trees along routes , where feasible.	mobility and access - page 40	Include the green infrastructure principles and elements within the design guidelies of new mobility routes in development guidelines
78		It is encouraged to promote the use of SUDs/ Sustainable Urban Drainage approaches to help manage stormwater and also increase green within the streetscape treatment ideas.	pedestrian movement network - page 49	Include the Sustainable Urban Drainage design guidelines to help storm water management in street and road upgrades.
79		Consideration should be given to view sheds and view corridor from the CBD towards the mountain and sea, and limiting impacts on those. Additionally, consideration should be given to climate projections especially in relation to increased wind speeds and heat island impacts.	topographical informants - page 74	Include the the protection of view corridors from the CBD towards the mounatain and see in development guidelines.
				Include the the design guidelines to address the increased effect of wind speeds and heat islands.

80	It is acknowledged that space constraints in a CBD can limit many green elements, but despite this, it is crucial to try and retain, optimise and introduce them where possible. Design elements to consider within all precincts include implementation of green roofs, green walls/vertical gardens, water sensitive urban design and SUDs, and tree and vegetation planting . These can enhance biodiversity and ecosystems within the city context, emphasise the mountain to sea connection, provide many co-benefits such as improved liveability, health and wellbeing, and support climate change resilience.	precinct based development guidance - page 83	Already mentioned above
81	Further, green heritage is essential to the cultural landscape within the CBD and it is important to consider how the building sits within the landscape.	Green heritage	Include the the design guidelines to address the green heritage elements such as historical trees, vegetation and other elements which form part of the cultural landsape.
82	The protection and enhancement of green infrastructure must be a part of the CBD LSDF. The benefits of GI can include cooler temperatures, cleaner air, improved aesthetics, increased property values, safer roads, noise buffering, improved health, and increased biodiversity.	Green infrastructure	Already mentioned above
83	It is suggested that Green Infrastructure (GI) principles be mentioned within this section as they should be utilised in the urban context to promote climate resilience and sustainability, specifically within section 6.1.4 Sustainable Development Strategy. It is further proposed that the use of SUDs approaches to help manage stormwater and also increase green be further explored within the various development strategies.	east foreshore precinct 9 - page 123	Add appropriate wording to Section 6.1.4
84	Correction: 5.1.1. Mobility Strategy – should be changed to 6.1.1.	Correct 5.1.1 and 6.1.1	Minor correction in document
85	“ecosystem” means a dynamic complex of animal, plant and micro-organism communities and their non-living environment interacting as a functional unit.	glossary - page 138	Glossary
86	“ecosystem service” means the benefits people derive from ecosystems. They include provisioning, regulating, supporting and cultural services.	glossary - page 138	Glossary
87	It is suggested that the term “Green Stormwater Infrastructure” be changed to “Green Infrastructure” throughout the document as the definition provided is almost identical and will allow for consistency across City policies and strategies.	glossary - page 138	Glossary
88	“green infrastructure” means natural and semi-natural open spaces, natural ecological and 'engineered' ecological systems, with other environmental features, that integrate with the built environment, to provide a wide range of ecological, community and infrastructure services. GI provides ecosystem services and is a continuum from naturally functioning systems to low impact development approaches for management of urbanisation impacts. GI assets ideally form an interconnected network within the urban environment"	glossary - page 138	Glossary
89	“Sustainable Urban Drainage Systems (SUDs)” is another term that could be used if wanting to refer to stormwater management specifically. SUDs forms part of green infrastructure, and are designed to manage stormwater locally (as close its source as possible), to mimic natural drainage and encourage its infiltration, attenuation and passive treatment.	glossary - page 138	Glossary
90	It is suggested that the definition for Resilience should be as per the Resilience Strategy, for consistency across City policies and strategies (the adopted Climate Change Strategy has also adopted the use of this definition with an amendment to include the word <u>environmental, before systems</u>):	proposed amendments	Glossary
91	“resilience” means the capacity of individuals, communities, institutions, businesses and systems in a city to survive, adapt and thrive no matter what kind of chronic stresses and acute shocks they experience.		as above
92	The quality of maps and images seem to be of low quality. Perhaps this will be changed in the final export?	Mapping comments	Resolution /Quality of images
93	Page 15: Opportunity number 7 is not included on the "CBD spatial restructuring opportunities map".	Opportunity number 7 is not included on the "CBD spatial restructuring opportunities map".	Minor correction in document
94	Page 22: Within Figure 4.4, a natural environment layer is proposed to be added as a standalone spatial idea / new spatial idea. This includes the incorporation of the green infrastructure network and existing tree canopies.	a natural environment layer is proposed to be added	Consideration be given to proposal of additional layer to map
95	Page 28: It is proposed for consideration that the 'structuring green space, retaining and enhancing tree cover' as seen in the legend, be included within the process diagrams of the concept map . This also includes the 'important green living streets' – perhaps a natural environment layer should be a small concept diagram on its own that then gets embedded into the larger LSDF draft concept map .	'structuring green space, retaining and enhancing tree cover' as seen in the legend, be included within the process diagrams of the concept map	Consider if the 'structuring green space, retaining and enhancing tree cover' as seen in the legend, can be included within the process diagrams of the concept map.
96	Section 5: Perhaps a legend should be included in each zoomed-in map? As well as what the numbers are referring to in the close ups.		Section 5: Perhaps a legend should be included in each zoomed-in map? As well as what the numbers are referring to in the close ups.

97	Recreation and Parks: Facilities Maintenance and PMO	I would like to emphasize a critical urban regeneration opportunity centred on the Cape Town Train Station precinct. Specifically, an old, vandalized building near the deck opposite the City of Cape Town Civic Centre —formerly part of the station infrastructure—could be revitalized into a mixed-use development for affordable housing and social amenities. This structure presents an ideal candidate for adaptive reuse, a sustainable development practice that transforms underutilized buildings into new functions, such as affordable apartments. By creating housing that caters to lower-income workers employed in the CBD —such as retail staff, cleaners, and office support—this initiative would foster social inclusivity and promote the “live-work-play” concept within the city centre. Following Jane Jacobs’ principles of urban vibrancy, the regeneration of this space would support community-building by ensuring diverse land use and increasing street activity beyond typical working hours .	Urban Regeneration and Adaptive Reuse Proposal	This state owned land opportunity (Monument Station & surrounds) has been identified in the document in Preicnct 10 already noting the document is conceptually very high level (note: this is indicative and has not been created in relation to a asset owner programmatic brief) (refer precinct 10). Affordable housing opportunities related to all state owned land is highlighted in the document already and will form of the development guidelines
98		Include this building in the priority regeneration list within the framework to address its current state of vandalism and urban decay.	recommendations	Monument Station, old baggage areas, surrounds, eastern station entrance from Chris Barnard. Subject to progress and funding of the ICTHUB.
99		Incentivize public-private partnerships to attract investment into affordable housing projects . This will help bridge funding gaps while promoting private-sector involvement.	Incentivize public-private partnerships to attract investment into affordable housing project	Include statements in the DGs in LSDF, HPOZ MP, MPB-L O/Zone
100		Ensure zoning flexibility to allow for mixed-use redevelopment while integrating housing, retail, and social services.	Ensure zoning flexibility	Include statements in the DGs in LSDF, HPOZ MP, MPB-L O/Zone
101	Development Management	The various “intensification & height indicator maps” for the various development precincts contains a generic legend that contains all legend items. However, the individual maps do not comprise of all the items in the legend. It would be useful if the legends for the individual maps could be tailored to speak only to the map being presented.	Mapping	Map legends to be cleaned up
102		The Draft LSDF makes liberal reference to “ affordable housing ”. While it is agreed that there is a strong desire for more affordable housing to be developed in the CBD, this desire is effectively meaningless unless a standalone Affordable Housing Policy is approved by Council . The approval of the Affordable Housing Policy therefore has to become a priority for the City.	Affordable housing	Include statements in the DGs in LSDF, HPOZ MP, MPB-L O/Zone
103		There are therefore increasing signs that the proliferation of short-term rental apartments is an undesirable urban trend that needs immediate policy attention. While it is recognised that the CBD LSDF is primarily a spatial planning policy, it does also have scope to contain policy guidelines / narratives about other relevant aspects that have spatial implications (e.g. affordable housing, parking, short-term rental residential developments). In this light, it is encouraged that the CBD LSDF includes policy guidelines / narratives on what the City’s position is with regards to short-term rental residential developments. It is nevertheless acknowledged that the only meaningful way to properly regulate short-term rentals in Cape Town is to approve a standalone policy . As with the Affordable Housing Policy, the City is encouraged to prioritise the approval of such a policy.	development dedicated to short term rentals	Include statements in the DGs in LSDF, HPOZ MP, MPB-L O/Zone. May have to acknowledge in IP that separate policy processes are under development
104	Subcouncil 15 (Ald Kempthorne & Cllr Mc Mahon)	1. The primary pedestrian routes in the CBD including City Squares, St Georges Mall, Company Gardens, etc.		Ensure update of IP with action project highlighting where improved route signage is required
105		2. Micro mobility circular route in the CBD.	Micro mobility circular route	Micromobility circular route needs to be explored through MAP
106		3. Parking Strategy for the CBD (including basement parking considerations)	Parking Strategy for the CBD	MAP Project to suggest policy wording to be included in the Chapter with Development Guidelines reconciling the zero parking, on and off street, structured, wrapped and above ground parking.
107		4. Global tourism opportunities in the CBD such as links to the Mountain, Noon Day Gun and Signal Hill, etc.	links to the Mountain, Noon Day Gun and Signal Hill	Highlight links to Mountain , Noon Day Gun and Signal Hill
108		5. Grand Parade interventions for Events	Grand Parade interventions for Events	List Parade as priority spot for activation under Implemenation plan
109		“pedestrianizing half of Bree (including a new Cycle lane) between Wale and Strand or Riebeeck	“pedestrianizing half of Bree (including a new Cycle lane) between Wale and Strand or Riebeeck	Reconceptualisation of Bree street interventions supported - refer to detail suggestion here
110		Change to Precinct Planning and Precinct Development (development facilitation and project packaging)	Page 1, “2. Transition Planning for the CBD”	Note proposed drafting textual change(s)
111		Precinct Planning, Development and Management.	Page 1, “ Precinct Management”	Note proposed drafting textual change(s)
112		Change to DSDF & EMF	Page 2, “SDF”	Note proposed drafting textual change(s)
113		Change to environmental and heritage factors	Page 2, “Environmental factors”	Note proposed drafting textual change(s)
114		Address LSDF study area as well as the parallel process with the CBD Mobility and Access Plan (explaining different study area)	Page 2, “1.3.1 Study Area”	CBD MAP scope area to be explained in document
115		Increase the transparency on the masked grey and yellow polygons. Make the CBD LSDF Study area red outline and neighbouring ones alternative colours.	Figure 2 (Page 3)	Note, proposed drawing change
116		Change to No. 8	Page 4, “No8”	Note, proposed drawing change
117		Explain parallel process with CBD Access and Mobility Plan as well as their process plan	Page 5, “1.5 LSDF Methodology/Process Plan”	CBD MAP scope area to be explained in document

118	Urban Mobility and Access Plan an informant to the spatial planning considerations.	Page 6, "Presents a precinct-scaled character analysis and opportunities to be considered "	CBD MAP scope area to be explained in document
119	This policy is now adopted	Page 7, Table 1, "Urban Design Policy"	Textual update
120	Have consistent use of LSDF and LASDF	Page 7, "LASDF"	Textual update
121	Incorporation of proposals in the CBD Access and Mobility Plan	Page 7, "Public transport"	Textual update
122	Fix table numbers	Page 7, "Table X"	Table numbering error
123	DSDF & EMF	Page 8, "DSDF"	Textual /terminology consistency
124	Consistent use of LSDF or LASDF	Page 8, "LSDF"	Textual update
125	DSDF & EMF	Page 8, "The Table Bay District Plan"	Textual update
126	HPOZ specific provisions go into the DMS and not the LSDF	Page 8, "specific guidelines for the CBD and Central City HPOZ"	Textual update
127	Add Table number as referred to in text	Page 8, "Sub District Guideline Objectives Table"	Textual update
128	SMEC to define a parking strategy in the Access and Mobility Plan recommendations	Page 9 " Parking Strategies	Agreed. Refer to UM MAP re Parking Strategy
129	Added to implementation plan	Page 9, "Develop a landscape implementation plan that the privates sector can respond to as development occurs over time"	Add to implementation plan
130	Parking Strategy for CBD allocated to SMEC and reflected in Implementation Plan	Page 9, "Reconcile the on grade parking solutions and requirements for quality public open space"	Agreed. Refer to UM MAP re Parking Strategy
131	Included in the implementation plan	Page 10, "Harrington Square as a defining public space"	Add to implementation plan
132	Change to draft land use policies and other studies...	Page 11, "Draft land use policy needing review and approval status"	Textual update
133	The Gateway Masterplan was an internal study undertaken in order to develop a vision and consider future land uses on the public land in the precinct. It did not go through a public participation process and was not adopted as a Council policy. Proposals in the Gateway Masterplan was incorporated into the CBD Transition LSDF and will be tested in the public participation process.	Page 13, "Foreshore Gateway Precinct, 2021"	Textual change for referencing the Gateway Masterplan
134	Remove this	Page 13, "By way of example, the 60m spire concept at Gallows Hill is isolated. When looking away from CBD/ Convention Centre precinct, along Somerset, the proposed towers provide the wrong visual cues, as one leaves the City. This professional opinion may well be contested by alternative, Part of the proposal infringes on Lion's Head view, at pedestrian level, as the scheme mediates from 86m to 25m, as one moves towards Lion's Head"	Review text
135	over the long term	Page 13, "Repurposing of the MyCiti depot"	Review text
136	De Waterkant excluded from the CBD Access and Mobility Plan and will focus on shorter term interventions in the CBD.	Page 13/14, "Waterfront. Consensus needs to be gained around some of these issues as part of the transport planning phase of the LSDF.	Review text
137	Approved Urban Design Policy 2024 to be addressed here	Page 14, "2.2.4 Draft Urban Design Concept & Guidelines"	The bulk of the drafting occurred prior to the approval, so now this can be updated. Change text.
138	The chosen image (Figure 8) only refer to the affected development parcels, but the Situational Analysis Report did not mention the catalyst for the Gateway Masterplan, namely the amendment of the Lower Buitengracht Road Reserve	Page 14, Figure 8	Update to Situational report suggested
139	The development opportunities identified in the Gateway Masterplan - un-used floor space on public land in De Waterkant (197 000m²) as well as approximate floor space made possible as a result of the Amendment of the Lower Buitengracht Road Reserve (108 000m²). Total floor space of 305 000m² to be potentially unlocked through the proposals in the Gateway Masterplan. Refer to all public land development Blocks on public land in Gateway Masterplan.	Page 14 "Foreshore Gateway Precinct, 2021"	Check implementation Plan
140	Add section on contour approach to determine height in the CBD	Page 15, "Great height should be controlled/ fully evaluated when"	Check if text can be improved

141	Urban regeneration (volume 1)	Encourage innovative land release strategies for public land in the CBD.	Page 16, "Currently inclusionary housing is implemented through"	Comment refers to land release strategies
142		Full Sentence?	Page 16, "The Municipal Planning Tribunal, through objections by activists"	Review text
143		Full sentence? Innovative land release strategy for public land in the CBD to address inclusionary/affordable housing provision.	Page 16, "Protracted affordable housing land release programme"	Review text
144		Explain why or remove	Page 16, "Development economics has resulted in two of the developments in the CBD that were conditioned to provide a component of affordable housing, not being constructed"	Review text
145		Fix name and date: DSDF&EMF (2023)	Page 17, "DSDF in 2020"	Review text
146		Add Household Survey info: Available Early 2025.	Page 17, "3.1.1 Demographic overview"	Review text
147		Get numbers from De Waterkant Safe Haven Shelter.	Page 17, "6175 homeless persons were counted in Cape Town (2018/19), with 871 homeless enumerated within the Central City area."	Review text
148		Mention provision of affordable housing on well-located public land as imperative. The Mayor's Consolidated Land Pipeline and the need for redress & address gentrification.	Page 20, "Housing Demand in terms of general provision and addressing backlogs..."	Review text
149		Add info from SMEC's CBD Mobility and Access Plan in this section.	Page 22, "3.2 Transport"	Add info from SMEC's CBD Mobility and Access Plan in this section.
150		Fix Legend item descriptions	Page 30, Figure 19	25 – Foreshore Freeway Precinct (Financial Feasibility of the Foreshore Freeway currently underway 27 – Quarry Site Precinct Bo-Kaap (Re-development of Strand Street Quarry project packaging currently underway) 28 – Buitengracht Gateway (Lower Buitengracht Portfolio project packaging currently underway)
151		Fix Legend Item descriptions	Page 32, Figure 20	25 – Foreshore Freeway Precinct (Financial Feasibility of the Foreshore Freeway currently underway 27 – Quarry Site Precinct Bo-Kaap (Re-development of Strand Street Quarry project packaging currently underway) 28 – Buitengracht Gateway (Lower Buitengracht Portfolio project packaging currently underway)
152		Fix spelling to Riebeeck	Page 37, "Riebeeck Square"	25 – Foreshore Freeway Precinct (Financial Feasibility of the Foreshore Freeway currently underway 27 – Quarry Site Precinct Bo-Kaap (Re-development of Strand Street Quarry project packaging currently underway) 28 – Buitengracht Gateway (Lower Buitengracht Portfolio project packaging currently underway)
153		25 – Foreshore Freeway Precinct (Financial Feasibility of the Foreshore Freeway currently underway 27 – Quarry Site Precinct Bo-Kaap (Re-development of Strand Street Quarry project packaging currently underway) 28 – Buitengracht Gateway (Lower Buitengracht Portfolio project packaging currently underway)	Page 38, Spaces	25 – Foreshore Freeway Precinct (Financial Feasibility of the Foreshore Freeway currently underway 27 – Quarry Site Precinct Bo-Kaap (Re-development of Strand Street Quarry project packaging currently underway) 28 – Buitengracht Gateway (Lower Buitengracht Portfolio project packaging currently underway)
154		Status quo of schools in the CBD e.g. Prestwich Primary in De Waterkant and others? (Government Schools)	Page 38, "3.3.5 Public Facilities"	Status of Schools in the CBD to be checked and added to the document
155		Add Streets and label with names	Page 39, Figure 26	Review text
156		Align with Implementation plan input from DPWI	Page 40, "National Public Works & Infrastructure is in the process of consolidating its lease portfolio within the Central City at the Customs House site, which will add significant vacancy within the CBD"	Implementation plan now reflects most up to date information, just update p 40 if required
157		Confirm if circus will remain	Page 40, "Through the Founders Garden Precinct the Artscape Theatre forecourt will also be redeveloped to accommodate the ZipZap Circus."	Check the status with the Founder's Garden DF & Precinctplan Approval regarding Zip Zap
158		Rationalization of CBD and Bo Kaap HPOZ overlap in Buitengracht Street included in Implementation Plan	Page 50, "Opportunity to rationalise HPOZ and apply NHRA intentions regarding heritage management at the local level"	Implementation plan and Guidelines in LSDF Doc to be updated
159		Intangible Heritage considerations to be undertaken at a precinct scale e.g. District 1	Page 50, "Opportunity to define and enhance the unique identity of precincts and to identify special areas which requires specific management parameters."	Determine what action is to be included in the IP
160		Top portion of HPOZ cut off, Figure "x" to be numbered accordingly.	Page 55, "Figure x"	Review text
161		Add Precinct Numbers for all	Page 57, Table 6	Review text

162	Add Precinct number and new name (West Foreshore)	Page 57, "Convention Precinct"	Review text
163	Change to Bo-Kaap (Hyphenated)	Page 57, "BOKAAP"	Review text
164	Update Property ownership map	Page 60, Figure 35	Review text
165	NDPWI, Also refer to latest information from Lizelle Coetzee	Page 61, "NPWI"	Review text
166	Refer to CBD Beautification Programme underway by MURP (Alastair Graham). Projects to be included in the Implementation Plan	Page 64, "3.8 Urban condition: Precinct management"	Refer to CBD Beautification Programme underway by MURP (Alastair Graham). Projects to be included in the Implementation Plan
167	The opinions/examples raised in a public document (without providing context) is of concern. Can we please remove "professional opinion" from the next version of the Situational Analysis and refer to the available height analysis and the motivation for the gradual increase along Buitengracht Street (refer to page 68 of the Urban Design Framework Report).	Page 68	Review text
168	Quantification underway by Haleem.	Page 76, "City's 2040 land use model will need to be carefully interrogated"	Review text
169	Refer to CBD Mobility and Access Plan that will inform the LSDF Implementation Plan.	Page 77, "The Comprehensive Integrated Transport Plan 2018-2023"	Review text
170	Refer to primary pedestrian route and NMT routes for priority interventions in the Access and Mobility Plan.	Page 77, "To this end, the pedestrianisation of the CBD started several years ago, with numerous projects, such as Waterkant Street, segments of Longmarket Street and non-motorised transport infrastructure facilitating movement between the CBD and the Waterfront precinct"	Review text
171	Refer to CBD Beautification programme by UR/MURP.	Page 77, "public precinct management"	Refer to CBD Beautification programme by UR/MURP.
172	Add red line to legend. Incorporate work i.e. circular route from the Access and Mobility Plan	Page 81, Figure 50: Mobility & access structure	Review text and map legend
173	Foreshore. Which Precinct?	Page 86, "Promote the creation of new green recreation space(s) in the vicinity of the foreshore"	Textual clarification
174	Remove this. Assessments and proposals concluded in Volume 2 of the LSDF.	Page 87, "Precinct scaled character assessment is currently a work-in-progress. At the time of drafting, assessments for the Mid-City, Government-Gardens, East City and Lower Gardens precincts were prioritised. The remaining De Waterkant/Gateway, Foreshore/Convention Districts and Cape Town Station precincts, are less resolved and require further work."	Remove for next iteration
175	6&9	Page 87, " Figure 56: CBD study area divided into character precincts"	Update text in document in need be
176	Try to keep the logical chronological order of the CCDS numbers. 5, 7, 8 etc. Use order seen on Pg. 87	Page 88, "4.3.1 Mid City (No.7)"	The numbering of precincts is based on CCDS neighbourhood numbering and there is an established logic. Check in document exact recommendation
177	Add street names and landmarks/ places of interest to orientate oneself, add figure name	Page 89	Additional annotations
178	Add street names and landmarks/ places of interest to orientate oneself	Page 103	Additional annotations
179	Add street names and landmarks/ places of interest to orientate oneself	Page 110	Additional annotations
180	Add street names and landmarks/ places of interest to orientate oneself. Also add figure number	Page 116 "Public Network Map"	Additional annotations
181	High Level Road	Page 116, "Strand/Highlevel Road"	Additional annotations
182	Add Heritage significance (Grading) map	Page 117	Information moved to Annexure A
183	Add Hudson Street	Page 119, "(e.g. Chiappini/ Napier/ Bennett Streets)"	Add Hudson Street
184	Change to Provincial Paving Testing Lab (PPTL)	Page 119, "PGWC Soil Lab Site"	Change to Provincial Paving Testing Lab (PPTL)
185	Optimisation and Rationalisation	Page 119, "Prestwich MyCiTi depot site holds opportunity for redevelopment should public transport operations not require"	Update text in document in need be
186	Delete Waterkant Street	Page 119, "Enhance view corridors along Strand/High Level Road by carefully considering the scale of new development. Waterkant Street"	Check/Consider textual change textual change

187	Add street names and landmarks/ places of interest to orientate oneself	Page 121	Additional annotations
188	Add figure numbers and captions consistently throughout the document	General Comment	Add figure numbers and captions consistently throughout the document
189	Repetition of Volume 1. Consider consolidation both Volumes into a single report.	Page 4, "1.1. Background to the CBD recovery programme"	Consider reducing repetition but it is noted Volume 2 should be read as a stand alone document at this point in the process.
190	Address CBD Mobility and Access Plan and slightly different study area.	Page 4, "1.3. Locality, study area and structural make-up"	CBD MAP Scope area to be confirmed
191	What about Mobility and Access in the CBD?	Page 5, "land use guidance"	Development Guidelines are under review and updated for next version
192	Mention access and mobility (pedestrianisation and public realm)	Page 6, "elements of the public structure to be reinforced or upgraded, the desired urban grain and precinct character to be honoured"	Development Guidelines are under review and updated for next version
193	Change to: Implementation Framework (Chapter 6): The implementation framework comprises DEVELOPMENT STRATEGIES. This is a strategy-led programme of actions to be owned transversally by implementing departments. This chapter will also include the identification of priority precincts and PROJECTS (where applicable) for more detailed planning and design intervention to realise public investment.	Page 6, "Implementation Framework (Chapter 6): The implementation framework comprises a development strategy. This is a strategy-led programme of actions to be owned transversally by implementing departments. This chapter will also include the identification of priority precincts and project lists (where applicable) for more detailed planning and design intervention to realise public investment"	Development Guidelines are under review and updated for next version
194	Policy documents from Volume 1 duplicated. Similar to District 6 LSDF, the Bo Kaap LSDF should also be added.	Page 7, "2. Policy and Strategy Integration"	Reconsider the duplications
195	DSDF & EMF for all times mentioned in paragraphs. Accurate and consistent description of UPD plans/products.	Page 7, "Table Bay District SDF"	Reconsider the duplications
196	Bo Kaap HPOZ referred to in the Lower Buitengracht Road area?	Page 11, "established CBD Local Area Overlay and the overlapping HPOZ..."	Reconsider the duplications
197	Refer to Mobility and Access Plan (MAP)	Page 12, "Short-term and medium term restructuring opportunities to remove vehicles from public streetscapes, do exist."	Update the Implementation Plan
198	Has to be rationalized in the CBD and overlap areas with HPOZ.	Page 13, "The CBD overlay zone is considered outdated..."	Change wording to reflect the need for the rationalisation of the CBD HPOZ and other overlapping areas
199	Hard surfaces/parking areas.	Page 14, "especially spaces consisting of hard landscaping."	Update text in document
200	Add roads layer	Page 14, Figure 3-2	Update only if required in context of all other map updates
201	Update the Buitengracht Street proposals accurately for Blocks 25 to 31. This leads to inaccuracies throughout the drawings. If the SDF is going to inform future rezoning applications, this needs to be updated throughout, consistently. Add Description of Bold Black line on legend. Draft Conceptual Framework of the CBD to inform the public realm structure. Show structuring elements (anchors and primary pedestrian routes) Improve legend (dark black lines). Delete "Castle Greens" under point 13 since it was addressed under point 4	Page 28, Figure 5-4	Update only if required in context of all other map updates
202	Clearer public structure or Conceptual Framework required before unpacking into detailed systems.	Page 29, "5.1.3 System-based public structure"	Update only if required in context of all other map updates
203	Indicate Buitengracht block proposals	Page 31, Figure 5-5	Update only if required in context of all other map updates
204	Change to "is to" and remove "I"	Page 40, "...access strategy is maximise public amenity value for pedestrians whilst accommodating the I functionality..."	Update only if required in context of all other map updates
205	Add: Prioritise pedestrianisation between key anchors in the CBD and improve legibility of priority/primary pedestrian routes. Improve continuity of NMT routes	Page 40, "Prioritise public transport to improve competitiveness of service offering"	Consider textual change as required
206	Add Church Street Roundabout as key structuring road	Page 40, "5.2.1 Road restructuring"	Outside the scope of the project
207	Change to rear of the. Also show horseshoe map/circular route proposed by SMEC in the MAP.	Page 41, "Improve bypass vehicular traffic throughput on designated high order major mobility routes along the front and rear the CBD"	Consider textual change as required
208	Label road names	Page 43, Figure 5-11	Consider changes to maps once clarified

209	Urban regeneration (volume 2)	Ensure that SMEC address this in their MAP proposals. Included in draft implementation plan as a key intervention	Page 44, "It is vital that a parking strategy for the CBD is put in place which supports its transition into a more people-centred environment"	Consider textual change as required
210		Urban Mobility to address in SMEC/MAP study	Page 44, "Promote the development of a series of Park-and-ride facilities..."	Consider textual change as required
211		Urban Mobility to address in SMEC/MAP study	Page 44, "Make provision for a series of park-&-ride/walk facilities"	Consider textual change as required
212		Mobility and Access Plan (MAP)	Page 44, "the CBD MAP interpretations"	Consider textual change as required
213		Add interventions from the MAP	Page 45, "Awaiting latest IPTN network inputs"	Consider textual change as required
214		Site identification as possible project for UM in implementation plan.	Page 46, "temporary solution, which will need to be relocated"	Consider textual change as required
215		To be added to primary pedestrian route for the CBD	Page 46, "To be added to primary pedestrian route for the CBD"	Consider textual change as required
216		NMT linkages to be informed by MAP/SMEC	Page 46, "Link up bicycle facilities"	Consider textual change as required
217		Align with MAP proposals and UM: NMT proposals	Page 46, "NMT Masterplan Phase 4"	Consider textual change as required
218		Castle of Good Hope, Bo Kaap, Parliament	Page 47, "facilities to connect important attractors"	Castle of Good Hope, Bo Kaap, Parliament
219		Label road names	Page 48, Figure 5-12	Consider changes to maps once clarified
220		Also, add Strand Street transition to High Level Road at the Strand Street Quarry.	Page 49, "Identified 'street carpet' treatment areas include: Strand Street between Cape Town Station Grand Parade"	Suggestion to add the 'carpet' for high mobility routes, request to bring the same ideas to Strand Highlevel - this is also subject to UM
221		Show map and align with MAP interventions. Identified routes align with MAP interventions	Page 51, "level 1 (Primary) Pedestrianisation routes"	The Implementation plan and map will need to capture this
222		Align with MAP interventions and recognize anchors outside the study area i.e. V&A Waterfront and Bo Kaap.	Page 53, "Figure 5-14: CBD proposed pedestrian route interventions"	Consider changes to maps once clarified
223		Replace UPDLI yellow map with updated public land ownership map. (Nosiphe) Verify table 5-3 against draft implementation plan (blocks & projects	Page 54, "Table 5-3 provides a consolidated schedule of public land development opportunities using the City's undeveloped and partially developed land inventory as a founding informant, supplemented by local knowledge gained through the LSDF process."	Replace UPDLI yellow map with updated public land ownership map. (Nosiphe) Verify table 5-3 against draft implementation plan (blocks & projects
224		Replace the yellow map with updated ownership map.	Page 55, Figure 5- spatially reflects this schedule.	Replace the yellow map with updated ownership map.
225		Replace map with Blocks/Projects map aligned with Implementation Plan	Page 62, "Figure 5-16: Potential public land development opportunities within Cape Town CBD"	Replace map with Blocks/Projects map aligned with Implementation Plan
226		Add Gateways as identified in the Bo-Kaap LSDF. Add Gateway into District 6	Page 65, "Table 5-4: System of CBD Gateways"	Consider textual and map change if required
227		(Precinct 6: West Foreshore)	Page 69, " Convention Centre Sub-Precinct"	Consider textual and map change if required
228		Confirm CBD HPOZ/Overlay Zone?	Page 73, "The CBD HPOZ boundary"	Parallel process will hopefully progress on this and guidelines then to include in the Development Guidelines
229		Change to Figure 5-5	Page 74, "(refer to Figure 5-)"	Consider textual and map change if required
230		Add Figure number to Figure on p. 77. Remove Castle Greens at point 13. Addressed under point 4. Point 17: Founders Garden and Artscape Precinct (FGAP)	Page 76, "5.5.3 Consolidated Spatial Development Framework"	Consider textual and map change if required
231		Fix Figure number	Page 78, "Figure 5-:"	Consider textual and map change if required
232		Same comments apply to Draft Concept on page 77.	Page 80, "Figure 5-24: CBD consolidated Spatial Development Framework Plan (working draft)"	Consider textual and map change if required
233		Structure headings chronologically as per CCDS numbers i.e. 5, 6, 7 etc.	Page 83, "5.6.1 Company Gardens Precinct (8)"	Structure headings chronologically as per CCDS numbers i.e. 5, 6, 7 etc.
234		Indicate all the Buitengracht blocks on Mid City Concept Plan map (Figure 5-28). Project packaging for Riebeek Square including basement parking, informal trading, Wale/Strand street Road Scheme to remove centre islands, 'grachte' as design informant, creation of Bo Kaap 'Stoep', provision for tour buses, public realm improvements and place making. (Urban Regeneration)	Page 88, "5.6.2 Mid City Precinct (7)"	Update Implementation Plan and other maps
235		Removal of Centre islands in Lower Buitengracht Street between Wale and Strand Street.	Page 89: "Figure 5-28: Mid-City Precinct 7 concept plan"	Update Implementation Plan and other maps

236		Public realm improvement at Riebeek Square include the amendment of Lower Buitengracht Road Scheme between Wale and Strand Street to enable the Bo Kaap "Stoep".	Page 90, "Development of the blocks surrounding the square should be carefully considered in terms of visual impact and the interactive relationship with the space. Heritage Square building form and character to be retained."	Update Implementation Plan and other maps if required
237		Block 28 bulk and massing on Strand Street: The approved ROD from IACOM set out details regarding changes to elevation and setbacks on Strand Street: podium approximately the same height as the cornice of the Lutheran Church Complex, namely 12m. A step down on Strand Street with the contour approach should be worded in consideration of the approved ROD. We are aligned on the 60m height.	Page 92, "Figure 5-29"	Update Implementation Plan and other maps if required
238		Ensure that Inner City Transport Hub and PTI are reflected on Station Precinct 10.	Page 109, "5.6.7 Station Precinct and surrounds (10)"	Update Implementation Plan and other maps if required
239		PTI addressed under Point 1. Also address the Inner City Transport Hub.	Page 110, "Figure 5-38: Station Precinct concept plan"	Update Implementation Plan and other maps if required
240		Block 28 bulk and massing on Strand Street: The approved ROD from IACOM set out details regarding changes to elevation and setbacks on Strand Street: podium approximately the same height as the cornice of the Lutheran Church Complex, namely 12m. A step down on Strand Street with the contour approach should be worded in consideration of the approved ROD. We are aligned on the 60m height. Gallows hill is a longer-term consideration but is still relevant. Even though you are not in agreement with the landmark tower (80m) at the Gallows Hill site, please consider the amendment of the ORANGE to RED to allow for additional height to 60 – 72m or at least extend your purple line into Gallows Hill site to allow 50m in the most prominent site on Helen Suzman freeway.	Page 113, "De Waterkant, (Precinct 5)"	Gallows Hill Landmark - The argument is based on the Tall Building Policy about clusterig of height towards the CBD - also embedded within the CCDS 2011
241		Add a large legible title indicating the CCDS/Precinct Number and Name of precinct (Do this for each of the Precincts!)Indicate all the Buitengracht Blocks on the map. Do not omit any blocks, Add Block 29 especially as omission may be an impediment for future projects. Also, remove greenery from PPTL Soil Lab Site. SSQ Parking area green Blobs fixed partially. Proposed public parking details at the Strand Street Quarry re-development in close proximity to Loader Street. Only De Smit Park will be retained for open space in this area. Dark green "Parklet" indicated next to Vos Street and Loader Street area on the draft LSDF map will provide the De Waterkant residents with a reason to object in the Strand Street Quarry statutory process.	Page 114, "Figure 5-40"	Update Implementation Plan and other maps if required
242		Still a work in progress.	Page 123, "6. Implementation Framework"	No changes required
242	Urban Mobility	"design guideline - f)" - consider one-waying some lower order roads and or removing parking to accomodate more space for walking and cycling where suitable.	2.2 District Six LSDF	Update Implementation Plan and other maps if required
242		"mass public transport" - But also to a degree cycling. around 50% of all trips in the metro are <5km. Easily done by bike if there were safe and continuous bike lanes. This means separated from traffic on higher order roads and/or reduced traffic/speeds on lower order roads to prioritise cycling over motorised traffic.	city wide connectivity vs spatial proximity	The MAP project needs to bring the correct proposals into the LSDF process
242		"over time:" - Better integrate cycling with public transport. One aspect of this is provision of safe and secure parking facilities at PTIs and bikeshare schemes where suitable (i.e. in the city centre) so that those coming in on train/bus have mobility options while they are in the city centre.		The MAP project needs to bring the correct proposals into the LSDF process
242		We have just submitted the "walking and cycling strategy" to the UM PC for noting before it goes to public participation from 14 Nov to 14 Dec. We are moving away from the term non-motorised transport and adopting "Active mobility" as the collective term.	restructuring the use of the public realm	The MAP project needs to bring the correct proposals into the LSDF process
242		"(5)" - pedestrian focussed I hope	spatial opportunities	No clear
242		"car-centric" - to reduce the car-centrism the cost/inconvenience of car travel will have to be increased. Parking availability and cost is key for this. But to do this there needs to be a viable transport alternative. The rail offers this alternative but getting to and from the rail in outlying areas, northern and southern suburbs, is not convenient enough for choice users. the LSDF therefore needs to acknowledge that dependency	Vision	The MAP project needs to bring the correct proposals into the LSDF process
242		"accessibility" - As per previous comment. accessibility to PTIs outside of the CBD needs to be improved so that more people CHOOSE to use buses, trains and MBTs over private cars.	guiding principles and characteristics to be promoted	The MAP project needs to bring the correct proposals into the LSDF process
242		"connectivity - multi modal movement routes" - Given that the CBD is such a tiny area roughly 2km by 1km, EVYERTHING should be prioritised for walking and cycling.		The MAP project needs to bring the correct proposals into the LSDF process

242		It would be useful if the maps associated with each of these ideas was on the same page so that you don't have to scroll back and forth to get a good understanding of the <u>overarching idea</u> .	Main spatial ideas	Changes can be considered in final version
242		With open spaces, can we please prioritise including safe and secure bicycle parking appropriate and in close proximity to cycling facilities (existing and proposed)	Public realm structure	Parallel process will hopefully progress on this and guidelines then to include in the Development Guideliens
ITEM No.	ORGANISATION TYPE	COMMENT	SUBJECT	RESPONSE
243		Aspects 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 <u>interface with the V&AW</u>	V&A and LSDF have similar expectations in symbiotic relationship.	Good alignment between V&A's upcoming development applications and the CBD LSDF. City will consider to add development objectives as summary
244		The vacancy levels for office have dropped much faster than anticipated. SAPOA has indicated that in two years to June 2024, Cape Town's vacancy rate has more than halved. This should be considered in the modelling and assumptions made for CBD growth.	Office vacancy levels dropping faster than anticipate, consider in future planning.	Information noted, no change in document anticipated
245		The general intentions and proposals contained within the LSDF Volume 2 are strongly aligned with the development intention and design principles for the ongoing management and proposed expansion of the V&A Waterfront as expressed in our July 2024 development application and supporting Heritage Impact Assessment. An array of objectives is expressed among the synthesis of contextual narrative, vision, guiding principles and main spatial ideas. The document would be clearer and more accessible if <u>these were distilled into a clear set of development objectives</u> .	Generate development objectives in Vol 2	Good alignment between V&A's upcoming development applications and the CBD LSDF. City will consider to add development objectives as summary
246		The spatial development framework study area now incorporates the entire Canal District of the V&A Waterfront, which is demarcated as part of the De Waterkant District in the plans. Two of the proposed CBD Precincts border on the V&A Waterfront and therefore any proposals made are of direct relevance and interest to the Waterfront. (Note the contextual framework boundary in Volume 1 did not include this area).	Study area in Vol 1 different from Vol 2	V&A consulted widely with strong intend to incorporate and co-plan as much as possible
247		there is general alignment in the design principles of the LSDF and the design objectives of the V&AW : Protect & enhance primary views of the water, mountain and notable heritage structures and landmarks from key public spaces, and retain and further enhance public access to water's edges where possible	Agreement with LSDF design objectives as similar to V&A	No changes expected in LSDF as no details proposals given.
248		Develop around a connected, legible, and well-defined public realm that links to the water & public amenities, both physically and visually	well-defined public realm to be developed	No changes expected in LSDF as no details proposals given.
249		Densify underdeveloped and undeveloped areas (Granger Bay and Breakwater areas) into mixed-use character areas with a strong residential focus , which will lend itself towards developing into a transit-orientated precinct within immediate proximity to various social and economic opportunities.	Densify un and under developed areas like Granger Bay and Breakwater areas into mixed us	Update the Development Guidelines and the Implementation plan if relevant.
250		Restore historic links to the City and protect and enhance views of key heritage resources in line with the V&AW Conservation Management Plan (CMP) . The CMP has been endorsed by the City and is expected to be approved by Heritage Western Cape in the first quarter of 2025.	V&AW Conservation Management Plan (CMP), how accommodated in LSDF?	Update the Development Guidelines and the Implementation plan if relevant.
251		The following proposals in the LSDF are relevant to V&A Waterfront development intentions and warrant further discussion to ensure alignment. The thumbnail diagrams and captions associated with the concept plans for each precinct are very small and difficult to read. <u>We recommend enlargaing these for legibility</u> .	Legends on maps too smal	Consider moving to UD annexure
252		We welcome the strong focus on NMT (pedestrian and cycle routes through the CBD) and more so the proposals to establish a continuous network of safe routes. However, management issues continue to undermine the use and viability of these modes as a viable alternative to private vehicle use.The lack of enforcement of the existing routes, preventing and finding parking on bike paths underscores the reality that these modes are not prioritised by the City .	Pedestrian routes appreciated but problem with viability as alternative to private vehicles need other solutions	Update the Implementation plan if relevant.
253		The same applies to the clear network of interconnected streets and landscaped squares indicated in the LSDF. These are logically located, and the V&A Waterfront's public space system has been set out to link in with these. However, similar concerns relating to the management, safety and activation of these spaces reduce their amenity value .	public streets and landscaped square have safety concerns and need activation as possible solution	Update the Development Guidelines and the Implementation plan if relevant.

254	V&A Waterfront Company	Where Micro-mobility routes align (linking Somerset Road to the Canal Precinct via the MyCiti bus depot and the Ebenezer-Dock Rd link connecting with Walter Sisulu Avenue) collaborate with the City to achieve the successful implementation of these proposals.	Micro-mobility routes planned by V&A to be checked if in MAP Project and IP	Minor changes may be required in the LSDF Doc, Map and Implementation Plan
255		Further align Micro-mobility routes proposed as part of the proposed TIA mitigation projects with LSDF proposals: Check the viability of the NMT route down lower Long Street , past the CTICC and into Dockrail road for cycling. Confirm preferred routes from Somerset Road to V&A's Canal Precinct. Investigate options for easier access from CT Station via Hans Strijdom and into Canal Precinct at intersection with Buitengracht	Lower Long Street into Dockrail Rd. Investigat easie access into Canal Precint	Minor changes may be required in the LSDF Doc, Map and Implementation Plan
256		Pedestrian route and redevelopment of the Prestwich Street MyCiti bus depot .(ex Gateway project proposals). - Micro-mobility access routes under Helen Suzman viaducts currently run past the MyCiti depot. Gateway project route is supported by V&AW and the <u>opportunity exists to partner on implementation</u>	Prestwich Street MyCiti bus depot & micro mobility routes	Good alignment between V&A and Gateway project route confirmed
257		NMT Route down Lower Long Street past CTICC, connecting into Dockrail Road. - We suggest that this is reviewed as this route is difficult for cycling	Lower long street NMT Route to be reviewed	Minor changes may be required in the LSDF Doc, Map and Implementation Plan
258		The LSDF indicates a substantial public square at the intersection of Buitengracht Street and Dock Road at the old Queens Hotel building . - V&AW to include the current parking forecourt to Queens Hotel as a key public space and transit hub.	substantial public square at the intersection of Buitengracht Street and Dock Road at the old Queens Hotel building	No change envisaged in LSDF Doc or map
259		The LSDF includes a clear network of interconnected streets and landscaped squares. - The V&AW has substantial placemaking expertise and experience to share with the City, specifically in activation, advertising and wayfinding.	V&AW has substantial placemaking expertise and experience to share with the City, specifically in activation, advertising and wayfinding.	V&A offers expertise in activation, advertising and wayfinding and should be connected to the LSDF's implementation partners
260		The Fan Walk on Somerset Road is incomplete, with a poor quality between Ebenezer Rd and Chiappini St. To cater for micromobility from both the CBD and Sea Point directions there needs to be two routes into the V&A . Creating two NMT routes to compensate for the gap in Fan Walk on Somerset Road one from each end of the "broken" section. The first is the "Ebenezer Walk" proposal and the second is project #5, "Prestwich Link". The two proposed routes will enable clear and safe passage to Canal Plaza. The following potential projects /additions to the LSDF within the LSDF boundary could include: • Project 4: Ebenezer Walk Extension of existing NMT facility on Ebenezer Rd to connect with Canal Plaza via upgraded NMT facility on Dock Rd. • Project 5: Prestwich Link Upgraded NMT facilities link Somerset Road with Battery Park via Alfred, Prestwich and Napier Streets improving safety for all, including learners and young people. This proposes upgrades for micromobility on Dock Rd to extend the City implemented sidewalk widening,NMT facility and landscaping Ebenezer NMT into the Canal Plaza as a key arrival point at the V&A).	New NMT routes to be delineated to connect Fan Walk and V&A	Proposals may have to be included in LSDF Doc, map and Implementation Plan but will be subject to the views of the MAP consultants.
261		The document is comprehensive and contains a significant amount of work and conceptual thought. The key messages are however not immediately apparent and lost in the many themes covered. The documents need to be streamlined to be more accessible and effective in achieving the desired outcomes.	Key messages of LSDF doc is not clear.	Minor changes may be required in the LSDF Doc.
262		• Include an executive summary that succinctly outlines the key and most urgent challenges to the CBD Transition, highlight the most important spatial objectives and desired outcomes and present a clear, actionable strategy (focussed on addressing the core issues) and action plan.	Add executive summary	Executive summary will be added before final report goes for recommendation
263		• Much of the body of the document could be provided as annexures with the focus of the report on the key issues, objectives and strategies.	Adjust doc format and add more to Annexure	Structural changes will only be considered after next 30 days
264		• Synthesise and highlight the strategic focus of the spatial concerns and proposed interventions	Highlight the strategic focus of the spatial concerns and proposed interventions	Structural changes will only be considered after next 30 days
265		• Make the link between the spatial proposals and the implementation tables clearer by integrating and simplifying priority actions and sequencing .	link between the spatial proposals and the implementation tables clearer. <u>Simplify priority actions</u> .	Structural changes will only be considered after next 30 days
266		• Link the depiction of the implementation strategy and priorities with the related supporting Land Use Management systems and procedures	Link the depiction of the implementation strategy and priorities with the related supporting Land Use Management <u>systems and procedures</u>	May only be added after the 30 day consultation process
267		• There should be clear reference to Annexure A in the main LSDF document . There is currently no narrative explaining the purpose of the conceptual diagrams and indicators and the relevance of these to the precinct-based development guidance.	Clearer reference to Ann A in LSDF Doc	May only be added after the 30 day consultation process

268	Considering the intent of the LSDF to give more detailed local area planning guidance relative to the DSDF, the precinct-based development guidance provided in section 5.6 should be the main component of the document. The precinct-based development guidelines could be revisited to ensure that these are framed as guidelines.	Precinct-based development guidance provided in section 5.6 should be the main component of the document.	Structural changes will only be considered after next 30 days
269	The Land Use Model forecast requires some conclusions and recommendations. It does not fit in with the flow of the document at this point and it is not clear what the function of this section is. Perhaps this should be an annexure.	Land use model forecast (section 5.5) needs to be summarised, concluded and does not fit in current place	Structural changes will only be considered after next 30 days
270	The general principles and spatial concepts for the CBD Transition are supported by the V&A Waterfront , with some minor alignment and additional suggestions proposed. As noted above, a focused concept that highlights the most significant levers of change to achieve the desired transition would assist in making the LSDF a more effective policy document. The key elements of this concept should include the spatial "backbone" of the CBD in terms of: 1. Destinations 2. Pedestrian and NMT linkages 3. Placemaking 4. Urban Management 5. Economic Opportunities including private sector building owner and tenant responses and small scale commercial and markets	General principles and spatial concepts for the CBD Transition are supported by the V&A Waterfront	Limited changes will only be considered after next 30 days
271	While the document is recognised as a spatial framework, to achieve and sustain effective transition, it is important that the operational and management constraints and opportunities associated with spatial proposals are referenced. Examples of this include: • Urban Management: safety, enforcement, cleansing, delivery management and so on • Placemaking and activation: event management, street trading, public transport operations • Land owner and tenant engagement: building maintenance, ground floor land uses, operating hours, delivery hours	Reference operational and management constraints and opportunities associated with spatial proposals	Limited changes will only be considered after next 30 days
272	Access route for public transport (MyCiti) via Duncan Dock Road through the Port secure area - Include Duncan Dock Route in proposed public transport network (connecting the city to the V&AW via the Cruise Terminal and gateway to Port) for formal adoption in LSDF to support engagement with Transnet and TPNA by both V&AW and City of Cape Town. Note: V&AW proposals for this are attached for reference	Duncan road proposal to be considered	Limited changes will only be considered after next 30 days
273	Propose private sector partnerships to operate bus and rail-based park and ride services to improve access into the CBD - The V&AW can share our park and ride pilot data and lessons. Implement a private sector-led park and ride service	Private partnerships to operate bus and rail-based P&R to be considered	Limited changes will only be considered after next 30 days
274	Align with proposed rationalization of MyCiti routes linking V&W with Central city and Atlantic Seaboard. - Operating cost contributions to a rationalised MyCiti service loop	Align with proposed rationalization of MyCiti routes linking V&W with Central city and Atlantic Seaboard	Limited changes will only be considered after next 30 days
275	Rationalise micro-mobility links to reinforce proposals for the pedestrian network improvements already outlined in the LSDF. Link these explicitly with partnership opportunities funded through Development Contributions. - Demonstrate the benefits of micromobility hubs located at strategic nodes where the city connects into the V&AW, supported by the proposed internal V&AW electric vehicles to further connect the V&AW and adjacent neighbourhoods.	Link pedestrian and micro-mobility and demonstrage benefits if implemented	Limited changes will only be considered after next 30 days
276	Consider the inclusion of micro-mobility hubs at primary public spaces to link bike-rental and other possible future micro-mobility services to MyCiti Trunk stations. - Demonstrate the mobility hub concept through the development and management of safe public spaces, that may include small scale trading spaces, information services and micro-mobility rentals and services	inclu micro-bolity hubs at primary public place to link bike-rental	Limited changes will only be considered after next 30 days
277	Consider the inclusion of a series of semi-permanent and permanent public markets and/ or public space activations at key locations within the CBD - Share knowledge and experience with the support, development and management of small and micro food and retail businesses	Inclusion of a series of semi-permanent and permanent public markets and/ or public space activations at key locations within the CBD	Limited changes will only be considered after next 30 days
278	Section 5.5.4 General policy intent: describes the intention to allow far taller buildings and a higher density of development within the CBD. - The traffic impacts of these proposals are not met with an equally robust public transport policy intent and, more importantly, implementation and management plan.	Describes the intention to allow far taller buildings and a higher density of development within the CBD.	Limited changes will only be considered after next 30 days

279		Principles and design guidelines for the distribution, location and management of trading/ market hubs - Small business incubators, SMME training and management expertise	Include principles and design guidelines for the distribution, location and management of trading/ market hubs	Limited changes will only be considered after next 30 days
280		section 3.1.4 (page 12 LSDF) - The V&A Waterfront agrees with this statement as it forms part of V&A strategy for future movement and transport.	LSDF Content (access and NMT)	No change to LSDF Doc
281		Section 3.1.6 (page 13) - The cruise terminal is located on TNPA owned land and is operated by the V&A. It is the intention of the V&A to make the pedestrian route more accessible along Dock Road in the areas owned by the V&AW and to be involved with planning of the coordination of the NMT route in this area.	Cruise terminal area needs more discussion	Limited changes will only be considered after next 30 days
282		Section 3.2 (page 14) - The harbour and waterfront area are an important part of the broader concept of the city and the region. A distinction should be made between the working port and the waterfront development. The working port is still industrial in nature and does sever the connection both visually and from a physical barrier (to pedestrian and vehicular traffic) perspective. However the V&AW questions the viability of 5 visual and access connection points along the working quayside and suggests focussing on establishing an opportunity for visual connection to the harbour at the end of the Heerengracht	V&A question the 5 visual connections between the Foreshore Freeway land and the sea (over the industrial zoning and the working port)	Limited changes will only be considered after next 30 days
283		Section 3.3 (page 15) - The V&AW supports this strategy and would like to explore this notion of alternative travel modes further with the City.	V&A would like to explore alternative travel modes	Limited changes will only be considered after next 30 days
284		page 15 (5) - Perhaps this should include the Port or the harbour in addition to the Waterfront precincts as Canal Precinct has a strong pedestrian link with the CBD albeit across a bridge across Buitengracht Street. Additional pedestrian access to the Waterfront from the CBD and the Port is supported.	page 15 (5) - Perhaps this should include the Port or the harbour in addition to the Waterfront precincts	Limited changes will only be considered after next 30 days
285		Page 21 - New proposals at the gateway between the City and Waterfront will promote pedestrian movement and create a legible link to the amenities of the Waterfront. However, the cruise liner Terminal is on TNPA land and is located within a working harbour component of the harbour and is subject to restrictions for customs etc.	p 21 proposal on new gateway to V&A to be discussed with cruise terminal issues	Limited changes will only be considered after next 30 days
286	Angela Gilbert (Private supporting CIBRA)	Chapter 1 P18, 20, 21 and Chapter 4 P30, 31 I do not accept these proposed amendment relaxations which will allow the Local Authority the automatic right, or the option, to strip the restrictive rights of the landowner, as vested in their Title Deed. As a matter of law, the Title Deed is a legal and binding document under the Deeds Registries Act 47 of 1937 as amended, SA Government. How can the Local Authority take away the restrictive rights of any owner without prior consultation with neighbours and the public regarding the effects that this would have on those adjacent landowners' rights? If the Title Deed is implied, then I do not accept this proposed amendment which will apparently allow the Local Authority the automatic right, or the option, to strip the restrictive rights of the landowner, as vested in their Title Deed.	Volume 1 Chapter 1 - P18, 20, 21, Chapter 2 - P23, Chapter 4 - P30, 31, Chapter 9 - P167, 168, 171 Chapter 20 - P226, 227	The LSDF does not give or take away any rights.
287		Chapter 2 P23 There should be no apparent or potential conflict between this By-Law as currently promulgated and any proposed amendments thereto , that obliges a landowner and it's neighbours to approach the courts for a decision or ruling.		Any change to the MPB-L will be advertised separately. The LSDF does not give or take away any rights
288		Chapter 9 P167, 168 and 171 Increased heights in HPOZ, I do not support these amendments in HPOZ areas because they aggravate an already over-scaled 25m podium height. I do not support proposals when such involve an increase in height because this will be extreme and overbearing in HPOZ areas.	Do not support height suggestions as implicating the HPOZ	The City has appointed a team of 3D Modellers, Urban Designers and Heritage Consultants to generate a 3D model which can aid the generation of Development Guidelines and test the heights in the draft LSDF.
289		Chapter 20 P226, 227 I strongly object to the proposed removal of content ie amendments under 161(1) and (2) because they do not protect and incentivise the preservation of Heritage Resources. I object to the continued inclusion of "or alternative", as this provides the opportunity to circumvent the provisions of HPOZ.	Object to proposed as on pa 226 -227	Limited changes will only be considered after next 30 days
290		We are concerned that much of this strategy is based on a post Covid-19 recovery plan. As at 31 Oct 2024, the relevance of this is questionable.	Strategy too strongly related to post covid	LSDF is an acceptable spatial planning process and the content of the documents and processes are specific to the period of drafting
291		1. This proposal outlines the need for the private and public sectors to work together. There is little mention of the third corner of this triangle - civic or community participation. It is noted that a Transdisciplinary Design Panel was recommended (but not implemented) in relation to Tall Building development. We would like this expanded to all projects that materially impact the nature or character of our area. A collaborative panel, which includes representatives from affected communities, is welcomed and supported. These representatives should be from civic organisations such as Ratepayers and Residents Associations rather than SRA/CIDs. CIDs are potentially conflicted, as they serve both business and communities.	Partnerships not adequately described and request a collaborative panel with representatives from affected communities (like from civic organisations like rate payers rather than CIDs)	Implementation of the LSDF will be resorting under the line departments. The City is in a process to appoint a Precinct Manager for the CBD who will work together with the Mayoral Urban Regeneration Department, the Central City Improvement District and the representatives of the Line Departments, to implement the Implementation Plan currently being formulated

292	CIBRA (City Bowl Ratepayers and Residents Association)	2. Heritage preservation in the City Bowl While considerable mention is given to heritage protection in this document, the proposed MPBL amendments would allow for base zoning to override heritage impacts. We strongly advocate for a City Bowl Heritage Management Plan (HMP) which would guide development in our Heritage Protection Overlay Zone. This HMP needs to be developed in consultation with affected communities.	Strong motivation for HMP for HPOZ	A parallel process has been initiated to draft the Development Guidelines for the LSDF vs the HPOZ/ HMP as well as a later version of the review of the Overlay Zones in the MPB-L. Latter will go via a separate public participation process.
293		3. Accommodating demand inclusively The proposal highlights the negative impact of short-term letting on housing availability for Capetonians seeking rental options close to their CBD workplaces. Other global cities have introduced policies to address this issue. Since Cape Town's last guest accommodation policy was issued in 2010, the demand for tourist accommodation has changed significantly. To address this, we urgently recommend updating the policy to prioritise housing availability for local residents who drive the city's economy. Currently, there is no regulation governing Airbnb rentals.	Airbnb's impact on rental options available to normal Cape Town Residents	Noted the Corporate Policy & Strategy Department is investigating several components and the LSDF will not take a definitive position on the preferred policies to be implemented
294		4. Provision for Open Space The City advertised an application for development for Erf 279, 23 Lower Long Street in November 2023. The application was for departures and rezoning to build 432 affordable rental units, along with retail space and parking. These units varied in size from studio 14m² to 2-bedroom family accommodation at 45m². There appears to be no provision made for recreational areas or open space. Is this an example of future affordable housing developments? If so, we have concerns around the impact of high rise living on the physical and mental health of residents.	Lack in the provision of recreational area and open space. What will happen with future affordable housing developments?	When new land use applications get submitted or land use changes requested by an applicant, the provision of recreational and open space gets considered. Overall statements of necessity can be included in the Development Guidelines under development for the LSDF, HPOZ MP, MPB-L O/Zone.
295		5. Enforcement of regulations With the encouragement of mixed use development, we are concerned about unregulated commercial activity negatively impacting residential areas. In a high rise affordable accommodation, how will commercial use rights be applied and enforced? For example, informal trading, restaurants, shops etc	How will commercial rights be obtained and managed	Development rights is a function of existing zoning (historically applied for and awarded), or new processes. Generally zoning categories allowing commercial land use rights were ambitiously awarded in the CBD and varying degrees of changes can be made without land use applications. Informal Trade however is managed through a public process where trading rights area awarded after process. Most restaurants and especially liquor licences would require processes to which land owners or neighbours may be privy to.
296	Johan Lata	The LSDF should recognise that PRASA/Metrorail is developing strategies to improve operations by shifting to a more service-oriented paradigm. One such strategy is inventory planning. This strategy emphasises the need for efficient planning in order to develop a delay and cancellation free service.	PRASA Train operations NB but requires efficient planning of tran services.	Noted and if applicable, text can be updated
297		While the port supports proposals for seamless pedestrian and micromobility access between the CBD and the Cruise Terminal, as well as the strengthening of NMT connections, we must consider the following challenges that could impact port operations: * Safety Concerns: The Port of Cape Town is a busy hub, and the increase in foot traffic and cyclist movement could result in potential accidents between pedestrians and trucks entering the port. Therefore, it is essential to implement safety measures to mitigate these risks. The existing infrastructure may not sufficiently accommodate the increased pedestrian and micromobility traffic, which could necessitate significant upgrades that require allocated funding	Drft LSDF - Page 30, 36, 105:	Risks are acknowledged and a focus group discussion can be considered during the next public process to ensure that design proposals caters for risks.
298		* Operational Disruptions: The increased movement activity in the area may disrupt with port operations, which will require careful planning measures and infrastructure upgrades to avoid these disruptions. The port area is a restricted zone, and increased access could pose security risks. Therefore, the port will need to enhance security measures and monitoring protocols to ensure safety and control over entry points, as well as upgrade the port entry system to accommodate the influx resulting from the proposal of easy access. Increased pedestrian movement and micromobility activity may lead to higher liability risks for the port in case of accidents or injuries		Risks are acknowledged and a focus group discussion can be considered during the next public process to ensure that design proposals caters for risks.
299		"Future development of Culemborg should aim to enhance the attractiveness of the Blaauwberg Cycle Route through active surveillance" . Culemborg is an intermodal logistics precinct that primarily supports operational demands related to port activities. Therefore, it is crucial that proposed land use activities complement port operations without creating conflicts. Additionally, the increased freight activity in Culemborg may disrupt public access and compromise safety for pedestrians and cyclists. To address this, it is recommended that designated buffer zones be established between port-related and public areas within Culemborg. Designing these buffer zones will protect port operations while allowing for future adaptive use for community events in the Harbour Arch area.	page 36	Culemborg falls outside the study area, but minor amendments to the LSDF may be considered after discussions.

300	TNPA	MyCiTi- IPTN networks: Are there any proposals to extend the MyCiTi route to South Arm Road? There is a clear need for this route to enhance access for port users and <u>employees, which would improve movement and operations at the port.</u>	Page 45	Clarity will be provided in the LSDF as and when available.
301		Lease a portion of Culemborg site – The Port of Cape Town (PoCT) is a city port that is becoming increasingly landlocked due to urban growth. The limited available space and logistical challenges present an opportunity to develop back-of-port facilities, ensuring that ocean-related activities remain within the port while relocating other uses to designated back-of-port areas to enhance operational efficiency. Consequently, the Culemborg site is dedicated exclusively to TNPA port -related logistics activities.	Page 46:	Noted
302		Gateway System of CBD: FW De Klerk/ Christiaan Barnard are adjacent to Culemborg site and give connectivity to the port. Implementing pedestrian-friendly zones, reducing vehicle speeds, and encouraging non-essential vehicle traffic could pose several risks, including: Reducing vehicle speeds and restricting access could lead to increased congestion on alternate routes, affecting logistics and operational efficiency. Increased pedestrian activity in certain zones might disrupt port operations and logistics, leading to <u>delays.</u>	page 65	Clarity will be provided in the LSDF as and when available.
303		V&A Waterfront/Cruise Terminal entrance at Dock Road: The TNPA has yet to determine the future land uses for the Coode Precinct which includes Cruise Terminal. Given that the port area is highly restricted, thorough research will be conducted regarding the future of the <u>precinct.</u>	Page 65	Clarity will be provided in the LSDF as and when available.
304		Improve NMT and e-mobility links to Cruise Terminal via V&A and possible Duncan Road: Duncan Road serves as a route for truck movement to A-berth and the FPT for accessing the port, creating a significant safety risk for non-motorized transport (NMT) users.	page 113	Clarity will be provided in the LSDF as and when available.
305		TNPA recommends prioritizing congestion mitigation measures at access points leading to the V&A Waterfront and Cruise Terminal. This includes designating lanes for commercial and tourism vehicles and enhancing real-time traffic management systems to improve <u>traffic flow.</u>	General comments	Clarity will be provided in the LSDF as and when available.
306		TNPA is currently developing an Integrated Transport Management Plan (ITMP) for the Port of Cape Town which amongst other objectives will include a transport demand management strategy specific to peak cruise seasons and promote coordination, <u>streamlined operations between TNPA and relevant transport planning entities.</u>		Clarity will be provided in the LSDF as and when available.
307		It is essential for the City of Cape Town (CoCT) to take into account the port operations adjacent to the Foreshore Precinct. If future residential developments are planned near the port, the CoCT should implement measures and guidelines to mitigate potential impacts, ensuring that they do not disrupt port operations or the movement of cargo.		Clarity will be provided in the LSDF as and when available.
308	J Du Preez	consider one-waying some lower order roads and or removing parking to accomodate <u>more space for walking and cycling where suitable.</u>	Page 8 - design guidelines (f)	already appears on next page
309		But also to a degree cycling, around 50% of all trips in the metro are <5km. Easily done by bike if there were safe and continuous bike lanes. This means separated from traffic on higher order roads and/or reduced traffic/speeds on lower order roads to prioritise cycling <u>over motorised traffic.</u>	Page 11 - city wide connectivity vs spatial proximity	already appears on next page
310		Better integrate cycling with public transport. One aspect of this is provision of safe and secure parking facilities at PTIs and bikeshare schemes where suitable (i.e. in the city centre) so that those coming in on train/bus have mobility options while they are in the city <u>centre.</u>		already appears on next page
311		We have just submitted the "walking and cycling strategy" to the UM PC for noting before it goes to public participation from 14 Nov to 14 Dec. We are moving away from the term non-motorised transport and adopting "Active mobility" as the collective term.	Page 12 - restructuring the use of the public realm	already appears on next page
312		to reduce the car-centrism the cost/inconvenience of car travel will have to be increased. Parking availability and cost is key for this. But to do this there needs to be a viable transport alternative. The rail offers this alternative but getting to and from the rail in outlying areas, northern and southern suburbs, is not convenient enough for choice users. <u>the LSDF therefore needs to acknowledge that dependency</u>	page 17 - vision	already appears on next page
313		As per previous comment. accessibility to PTIs outside of the CBD needs to be improved so that more people CHOOSE to use buses, trains and MBTs over private cars.	page 19 - guiding principles and characteristics to be promoted	already appears on next page
314		Given that the CBD is such a tiny area roughly 2km by 1km, EVERYTHING should be prioritised for walking and cycling.		already appears on next page

315		It would be useful if the maps associated with each of these ideas was on the same page so that you don't have to scroll back and forth to get a good understanding of the <u>overarching idea</u> .	page 21 - main spatial ideas	already appears on next page
316		With open spaces, can we please prioritise including safe and secure bicycle parking appropriate and in close proximity to cycling facilities (existing and proposed)	page 25 - public realm structure	already appears on next page
318	Economic Development Partnership (EDP)	The LSDF currently conceptualises the NTE as a 12-hour activity. This comment proposes expanding the definition to a 24-hour economy, recognising the interconnectedness of the <u>day and night economies</u> .	Volume 2, Page 130: 6.1.3:	none
319		Suggestions for the LSDF to Better Incorporate the NTE		
320		1) Transport Prioritisation: Extend public transport hours and improve night-time services like MyCiti buses . Ensure safety along transport routes with better lighting, patrollers, and <u>backup power during load shedding</u> .	NTE Zones & incentives	MyCiti operations will gradually improves if ridership increases with higher residential land uses.
321		2) Safety Improvements: Increase resources for security infrastructure, including street lighting and patrols in NTE zones . Proactively design public spaces for safety to reduce crime and boost confidence in the NTE.	NTE Zones & incentives	Implementation plan to make provision for a street lighting audit with annual action plan for improvement especially areas outside the current CIDs.
322		1) Designated NTE Zones: Establish specific zones with incentives for developers to improve infrastructure and facilities . These zones should support placemaking strategies for 24-hour use and create areas focused on entertainment and cultural activities.	NTE Zones & incentives	Implementation plan to make provision for the delineation of NTE zones, with associated action plans for improvement related to activities.
323		2) Clustering Strategy: Build the NTE around central themes , such as arts and culture, while supporting services like restaurants and hotels to create cohesive, themed <u>experiences</u> .	NTE Zones	Implementation plan to make provision for the delineation of NTE zones, with associated action plans for improvement related to activities.
324		3) Linking Daytime and Night-Time Economies: Integrate NTE planning with broader city development goals, recognising the interdependence of day and night economies. Essential services and infrastructure should support both in a unified manner.	NTE Zones	Implementation plan to make provision for the delineation of NTE zones, with associated action plans for improvement related to activities.
325		4) Institutional Arrangements : Establish an NTE planning task force to develop an action plan addressing specific NTE challenges. Consider appointing a Night Mayor, based on successful global examples, to manage NTE activities and coordinate stakeholders for a <u>safer, more vibrant economy</u> .	NTE Task Force	Implementation plan to make provision for the delineation of NTE zones, with associated action plans for improvement related to activities.
326		The NTE's success depends on multistakeholder collaboration between the public, private, and civil society sectors. Partnerships are essential to ensure the infrastructure, safety, and services that the NTE requires. The local government must provide key services such as transport and security beyond daytime hours, while private businesses play a crucial role in driving commercial activity and innovation .	NTE Task Force	Implementation plan to make provision for the delineation of NTE zones, with associated action plans for improvement related to activities.
327		Creating a collaborative urban design policy with incentives such as tax benefits and designated NTE zones can encourage private sector participation. Given the broad impact of the NTE on sectors like law enforcement, transport, arts, and culture, multiple government departments and community stakeholders must collaborate for cohesive <u>planning and implementation</u> .	Incentives for NTE	Implementation plan to make provision for the delineation of NTE zones & associated incentives, with associated action plans for improvement related to activities.
328		The LSDF should incorporate this collaborative framework by advocating for an NTE task force . This task force would align the efforts of government and private sector players, ensuring the NTE serves various interests. As mentioned previously, the introduction of a Night Mayor could further ensure the NTE's integration into broader urban planning efforts. By fostering partnerships, the LSDF can position the NTE as a driver of economic growth, <u>tourism, and urban regeneration</u> .	NTE Task Force	Implementation plan to make provision for the delineation of NTE zones & associated incentives, with associated action plans for improvement related to activities.
329		How the EDP Can Support, the Economic Development Partnership (EDP) is well-suited to act as an intermediary in the NTE's development. By designing partnership frameworks and fostering trust, the EDP ensures that stakeholders are aligned and empowered to deliver sustainable outcomes. Through its expertise, the EDP can facilitate a well-coordinated, inclusive NTE that benefits all sectors of Cape Town's economy.	EDP Can play a role	Implementation plan to make provision for the delineation of NTE zones & associated incentives, with associated action plans for improvement related to activities.
330		The SDF should align closer with the Climate Change Action Plan - specifically around concerns related to extreme heat. Although the concern is recognised in the Public Realm and Sustainable Development Strategies, it does not get discussed in the main plan. Note that response measures should not only focus on urban trees - their cooling effect is very localised and the dark tree canopy increases albedo resulting in less mitigation of the overall heat absorption. There should be extensive use of vegetated surfaces as well to <u>lower the albedo and reduce thermal mass</u> .	Climate change not strong enough	Implementation plan to make provision for the action items related to climate change (adaptation and mitigation) and consider associated incentives.
331		The biggest concern arising from reading the SDF is that it's objectives and future-proof outlook is not yet supported by the CIP . There should be inter-Departmental coordination to ensure that the mobility needs and planning reflected in the SDF is incorporated in the current update of the CIP .	CITP and LSDF	Clarity will be provided in the LSDF as and when available.

332	WC Department of Environmental Affairs and Development Planning (DEADP)	The proposals are not clear on the ultimate alignments of the NMT routes . Note that an NMT feeder via the foreshore should be additional to the current feeder route, not a replacement - going via the foreshore is too long for inner city-bound cyclists .	Section 5.2.5 NMT proposals	Clarity will be provided in the LSDF as and when available.
333		The two primary NMT routes from the North (Table View) and East (Salt River) should be brought together at the gateway into the CBD , and then split into clearly demarcated feeder routes into the city centre – as proposed, one arm leading to the foreshore, but then one straight into the city past the station and one route via Sir Lowry-Darling St as a northern fork .	NMT routes from the North (Table View) and East (Salt River) should be brought together at the gateway into the CBD	Clarity will be provided in the LSDF as and when available.
334		These three arms must be class 2 routes to encourage their usage.	NMT	Clarity will be provided in the LSDF as and when available.
335		No mention is made of the historical waterways that according to rumour still run under the city streets. Can these be incorporated in the surface designs?	Waterways	Clarity will be provided in the LSDF as and when available.
336		What about placing more emphasis on the reinstatement of the MyCiti link to the airport as part of the economic growth strategy?	MyCity to CTIA	Clarity will be provided in the LSDF as and when available.
337		The SDF provides no guidance on solar PV installations in the CBD .	Solar PV	Implementation plan to make provision for the action items related to climate change (adaptation and mitigation) and consider associated incentives.
338		A concern that should probably get mention is the prevalence of protection / extortion rackets in the city centre. These have the potential to frustrate the best-laid plans.	Safety and Security	Implementation plan to make provision action plans for improvement of safety and security
339	Development Action Group (DAG)	Inclusivity, Affordability , Long-Term Visioning for the CBD - 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 .	Inclusionary Housing	Include statements in the DGs in LSDF, HPOZ MP, MPB-L O/Zone
340		A further concern is around the length of “long-term” planning for the CBD , which as indicated abov eequates 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 . This begs question, given the strategic nature of the CBD, to what extent has 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 the vision only 5-10 years or 50-100 years	Update text and ensure Implemeantion plan is clearer.
341		As the City pursues its urban transition vision for the CBD and the area's unique economic opportunities are maximised to its full extent, it remains crucial that this process does not lead to further displacement and more so, exclusion of citizens who wish to reside in the area . While there appears to be adequate recognition of this fact and some attempt to increase the complement of affordable housing in the CBD, specifically for families and not only young professionals, innovation around how such objectives can be achieved is paramount.	Displacement of residents due to AirBnB or high rental prices	Include statements in the DGs in LSDF, HPOZ MP, MPB-L O/Zone
342		One such an innovative mechanism worth considering and that would be appropriate in areas such as Bo-Kaap and District Six where gentrification is rife is community land trusts (CLTs)3. CLTs is a land financing tool commonly used to shield low-income families from relocation and to protect neighbourhoods from gentrification .	Tools for land financing	Include statements in the DGs in LSDF, HPOZ MP, MPB-L O/Zone
343		While we support the proposed amendments to the CBD overlay zone, an actual Inclusionary Housing policy would of course provide much more certainty . We expect that the Affordable Housing Policy (Draft) would provide somewhat more certainty in this regard but keep a keen eye and remain committed to the process to have an Inclusionary Housing policy approved by Council.	Inclusionary Housing overlay zone	Include statements in the DGs in LSDF, HPOZ MP, MPB-L O/Zone
344		In addition to the proposed review, we recommend the inclusion of an in-lieu fee payment – especially because some developers may perceive the proposed contributions5 (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).	Inclusionary Housing overlay zone	Include statements in the DGs in LSDF, HPOZ MP, MPB-L O/Zone

345		While we commend the City's stated land value capture approach , we want to emphasize that all mechanisms and tools used/proposed must be such that it facilitates absolute efficiency and clarity in how value created 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 very well-located and strategic CBD and it is vital that the City is proactive in creating ways in which they can capture this value.	Residual value calculator as instrument for inclusionary housing	Include statements in the DGs in LSDF, HPOZ MP, MPB-L O/Zone
346		Recognition and Activation of Thibault Square: The lack of emphasis of Thibault Square from the LSDF is a critical oversight. As a prominent public space in an area undergoing significant office-to-residential conversion in recent years, there is a need to reimagine Thibault Square as an anchoring outdoor living room for new residents in the area, especially at night, enhancing the city's vision for a vibrant, mixed-use CBD. This space should become a focal point for pedestrian activity, hosting events like pop-up markets, art installations, and small gatherings.	Thibault Sq to included	Include statements in the DGs in LSDF, HPOZ MP, MPB-L O/Zone
347		Support for Small, Intimate Public Spaces: While the LSDF emphasises large public spaces like the Grand Parade, Greenmarket Square, and Company's Gardens, it must acknowledge the importance of smaller, more intimate public spaces and alleyways, particularly connecting alleyways between Long and Bree Streets. These smaller nodes can become micro-destinations for local residents and visitors alike. Private leases of these alleyways should be reviewed, as they sterilise these potential public assets for up to a decade, precluding flexible, dynamic uses. Drawing from Melbourne's example, these alleyways could instead be designated for food vendors and pop-up events that foster social life in Cape Town's CBD at all hours.	Smaller POSs / alleys should also be in the IP	Provision should be made in the Implemenation Plan for further analysis and actions
348		Replication of Effective Small-Scale Public Space Interventions: The corner of Bree and Shortmarket Streets on Riebeek Square offers an example of a successful intervention: a seating ledge that wraps around the area, creating a simple but effective public space. Replicating similar seating installations in other areas would allow people to gather, linger, and connect, encouraging organic interactions. These installations need to consider user comfort, shade, and weather protection, creating environments that are inviting and usercentric.	Example of small POS successful intervention	Provision should be made in the Implemenation Plan for further analysis and actions
349		Strengthening Connections to Natural Spaces – Signal Hill Staircase and Pavilions: While the LSDF frequently references the importance of connections to natural landmarks, such as Table Mountain, it lacks specific actions to bring these concepts to life. A public staircase to the top of Signal Hill, either from the Gateway Precinct or Bo Kaap accompanied by a series of shaded pavilions along the way, would provide a unique, legible link between the city and its natural environment. These pavilions, designed as places of rest and contemplation, would foster quiet public engagement and make the climb accessible to a wider demographic, adding a recreational element that strengthens Cape Town's appeal as a city harmonised with its surrounding landscape.	Signal Hill Stair case and Pavilions	Provision should be made in the Implemenation Plan for further analysis and actions
350		Increased Provision for Covered Public Spaces and Weather-Responsive Design: Cape Town's weather, particularly the sun and rain, limits the usability of public spaces throughout the year. Adding covered pavilions, shade structures, and strategically placed awnings would make the city's public spaces more welcoming, usable, and comfortable year-round. The Grand Parade, for example, could benefit immensely from covered seating and shaded pavilions inspired by Fort Worth's Sundance Square. These areas would provide reprieve from the sun and rain, encouraging more frequent and longer visits to public spaces.	Covered public spaces	Provision should be made in the Implemenation Plan for further analysis and actions
351		Integration of Camissa and Historic Water Channels: The LSDF overlooks the historically significant Camissa River and Cape Town's intricate water channels. Rediscovering and incorporating these water channels into the CBD's urban landscape could act as a reminder of Cape Town's natural heritage. By incorporating water features—whether exposed channels, fountains, or educational installations—the city could add elements that are both aesthetic and functional. Integrating the Camissa would also resonate with Cape Town's cultural narratives, bridging historical relevance with contemporary urban life.	Historic water channels	Provision should be made in the Implemenation Plan for further analysis and actions

352	Sean Dayton	Ensuring Developer Accountability for Public Realm Contributions: Developer promises to improve the public realm often fall short of delivery. Instances like Harbour Arch's proposed park under the freeway and River Club's Khoe cultural village illustrate the need for stronger measures in the LSDF to ensure developers honour their public commitments. Clear, enforceable accountability measures should be implemented, including binding timelines and a mechanism for community oversight. In addition, performance bonds could provide financial incentives for developers to deliver on their promises, ensuring <u>contributions to the public realm are timely and beneficial</u> .	Incentives towards public realm upgrades as quit pro quo for heigher buildings not adequately enforced by the City	Include statements in the DGs in LSDF, HPOZ MP, MPB-L O/Zone. May have to acknowledge in IP that separate procesess will have to contain enforceable actions, such as MPB-L approvals
353		Revisiting Cycle Lane Design to Improve Safety and Connectivity: The LSDF includes non-motorised transport (NMT) options, yet certain cycle lanes, like the green-painted Class 3 cycle lanes, have not effectively enhanced cyclist safety. On the other end of the spectrum, the overly engineered Adderley Street cycle lane, which creates an obstructive height difference, restricts smooth pedestrian-cyclist interaction. To achieve a successful NMT network, the City should consider more cohesive, accessible cycle paths that prioritise cyclist visibility and connection with the surrounding pedestrian landscape. Simple, uninterrupted, ground-level cycle paths would enhance safety and usability across Cape Town's CBD.	Ineffective NMT	Development Guidelines to be expanded
354		Enhanced Pedestrianisation and e-Hailing Solutions: The LSDF's pedestrianisation plans for Longmarket Street, Marine Drive, and Long Street (at night) are welcome additions to Cape Town's public space offerings. However, creating safe, accessible e-hailing pickup and drop-off points near these pedestrianised zones is essential to maintain connectivity and ease of movement. Providing well-located e-hailing zones would facilitate access without detracting from the pedestrian environment, offering an effective balance <u>between public accessibility and a car-free atmosphere</u> .	Pedestrian routes and e-hailing	Development Guidelines to be expanded
355		Innovative, Interactive Public Installations for Dynamic Urban Spaces: Cape Town's public spaces need imaginative, interactive elements to engage users of all ages. The LSDF should include a range of playful and educational features, such as amphitheatres for nighttime documentary screenings, whisper parabolas for sound installations, and open-air exhibitions. Drawing inspiration from New York's Bryant Park, interactive installations in Cape Town could transform public spaces into lively social hubs, particularly at night. These types of installations invite community engagement, cater to both locals and tourists, and <u>foster a vibrant, inclusive CBD.</u>	Dynamic Urban Spaces	Development Guidelines to be expanded
356		Encouraging Sports and Physical Activities in Public Spaces: Public spaces can become more than just areas for social gathering; they can serve as hubs for physical activity, promoting health and community interaction. The LSDF should incorporate provisions for sports facilities that are accessible and inviting, such as mini-soccer pitches, basketball courts, and skate parks. These installations, like the successful Eyethu Skate Park in Hout Bay, could attract youth and families, providing alternatives to nightlife-focused activities and reducing the emphasis on alcohol-centric night-time activities in the CBD.	Sport & Rec in POSs	Development Guidelines to be expanded
357		Effective, User-Friendly Signage for Public Space Use: Many residents and visitors are unaware of how to fully utilise public spaces, often due to a lack of clear, informative signage. Thoughtfully designed signboards should be installed across Cape Town's public spaces, explaining how people can reserve, rent, or otherwise engage with these areas for events or activities. Signboards with clear contact details for the City's public spaces department would simplify the process, encouraging more people to activate and enjoy <u>Cape Town's public spaces</u> .	Signage for POS	Development Guidelines to be expanded
358		Promoting Active Frontages for Street-Level Engagement: The LSDF should enforce policies that prioritise active frontages, where building designs encourage interaction between pedestrians and the ground-floor businesses. Currently, many buildings have blank walls or windows covered in vinyl, which detract from the pedestrian experience. Redesigning these frontages to be transparent and accessible would enhance the CBD's walkability, inviting people to linger and engage with their surroundings. Active frontages should include transparent windows, ground-level entrances, and setbacks that promote <u>interaction</u> .	Active street frontages, retrofitting, how?	Development Guidelines to be expanded
359		Recognition of Additional Gateway Locations: While the LSDF designates certain gateway locations, it overlooks essential pedestrian gateways like the Wale Street gateway into the Bo-Kaap (which has benefitted from the introduction of a string of flags across the street to give it a gateway feel), the north and south entrances to the Company's Gardens, and the top of Long Street near Kloof Street. These natural pedestrian nodes serve as intuitive access points into the city and could benefit from enhanced signage, lighting, and landscaping to improve the visitor experience. Recognizing and beautifying these gateway locations could help orient and welcome pedestrians entering the city.	Additional Gateways	Development Guidelines to be expanded

360		Detailed Guidelines for Tall Buildings and Structured Parking: The LSDF's recommendations for tall buildings, especially those with structured parking, align well with adaptable urban development. Requiring minimum heights (3.1m) and level floors in parking structures allows these spaces to be repurposed in the future, facilitating adaptive reuse as urban needs change. The LSDF should strongly enforce these guidelines, aligning with international best practices that support sustainable, mixed-use urban design.	Parking ceilings	Development Guidelines to be expanded
361		Comprehensive Public Space Policy Framework with Improved Lighting: While the LSDF addresses some public realm enhancements, it could further emphasise lighting improvements for safety and ambiance. Adding elements like fairy lights and illuminated pathways would make Cape Town's public spaces inviting at night, encouraging more people to venture into the CBD after hours. Additionally, a focus on cultural and artistic lighting installations would reinforce Cape Town's identity as a city of art and culture.	Public lighting	Implementation plan to make provision for a street lighting audit with annual action plan for improvement especially areas outside the current CIDs.
362		The draft LSDF includes important points on public spaces but could go further in terms of recommending a detailed Public Space Policy Framework for the CBD and surrounding areas of the City Bowl. Such a framework should outline how the City plans to consistently activate, curate, and maintain individual public spaces and make clear which departments are responsible for which aspects of the public realm strategy, ensuring they are safe, vibrant, and accessible both day and night and most importantly, that there is consistent programming that promotes inclusive events. Market offerings in different squares and public spaces in the City should also serve a unique purpose – for example Greenmarket Square could leverage its existing market offering as a location for African curios, another site could encourage vendors of fresh fruit and vegetables, another clothing etc.	Detailed public spaces action plan required	Implementation plan to make provision for a specific audit of public spaces and an activation plan.
363		An effective Public Space Policy Framework would also empower communities by establishing clear guidelines and contact points for using these spaces, fostering a sense of shared ownership and encouraging active community participation and could involve principles around public-private funding models for investment in public space infrastructure such as five-a-side football pitches, Padel courts, skateboarding facilities, basketball hoops, amphitheatres, seating and picnic benches, lighting, electrical plugpoints, braai facilities, public art and other attractors that are so critically needed.	Detailed public spaces action plan required	Implementation plan to make provision for a specific audit of public spaces and an activation plan.
364		A Reimagined Grand Parade: To revitalise the Grand Parade as a dynamic, 24-hour destination, Cape Town should draw on successful global models while embracing the area's unique history and cultural potential. Once a gathering ground for military parades and the site of Nelson Mandela's iconic 1990 speech, the Grand Parade should be restored as a central, vibrant public space and we should encourage its use once again as a military parade ground. A comprehensive approach could include regular, managed events like food markets, art installations, and community performances that attract a steady flow of visitors. Inspired by global spaces such as Bryant Park and Djemaa el Fna, the Grand Parade could offer structured seating, shaded pavilions, and diverse stall offerings that reflect Cape Town's culture. Improved lighting, evening programming, and thoughtfully designed signboards could ensure safety and inform the community on how to organize or reserve space for activities. This approach would transform the Grand Parade from an underused parking lot into a bustling, iconic hub for creativity, history, and social interaction, echoing its historic role as Cape Town's communal heart.	Grand Parade mega project	Implementation plan to make provision for a specific audit of public spaces and an activation plan.
365		The LSDF is too restrained when it comes to affordable housing. Bigger land parcels are to be included in order to make a bigger dent on the housing backlog.	Affordable and inclusionary housing	Implementation plan and maps to be clear on all possible affordable housing projects. Development Guidelines to be clear on incentivised expectation of Council re Inclusionary Housing
366		Lower Gardens - we push for retail sites along the main roads for economic opportunities.	Market areas	Implementation plan to make provision for a specific audit of new market areas and include action plan details.
367		pedestrian and cycling carpets to be established to match high rise. links to public open space to be strengthened	New NMT	Implementation plan to make provision programme of expansion
368		subterranean parking for nearby offices and new development	Format of parking	Implementation plan to make provision for further future assessments. Development Guidelines needs to lay down core principles.
369		we push for the city to do a service industry shortage survey in the area. These could be accomodated in the new developments, and bring people into the local economy.	Need for a service industry shortage survey	Generally something the CCID or other CIDs/ SRAs should be conductin
370		Large scale buildings that do not fit into the fine grain nature of the neighbourhood should be discouraged.	Fine grain buildings preferred	Development Guidelines to be expanded

371	Carl Schmidt	We caution the city against housing whole families in small studio apartments . We plead with the city to not recreate migrant labour camps for the Night Time Economy, but create <u>HOMES for the whole families</u> .	Size of affordable or inclusionary housing	Development Guidelines to be expanded
372		it would be a missed opportunity if only housing opportunities were created. The sites identifies for redevelopment are located on vibrant corridors where opportunities exist for small retail at street level .	Government redevelopment sites to be mixed us	Development Guidelines to be expanded
373		Government garages sites can be repurposed and used for workshop share spaces where <u>small craft skills can be transferred and businesses can be incubated</u> .	Government redevelopment sites to be mixed us	Development Guidelines to be expanded
374		The pedestrian network is rather uncomfortable , it will require serious restructuring to meet the demand. Once these carpets for pedestrains are resolved, we could start to see a decrease in vehicle traffic during summer months, as local residents would opt for walking <u>and cycling routes more</u> .	NMT and cycle	Clarity will be provided in the LSDF as and when available.
375		Taking cues from the CCT Urban design policy, parts of the Buitenkant and Hope street corridors are in desperate need for urban upgrading to suit current network requirements.	new NMT routes suggested	Clarity will be provided in the LSDF as and when available.
376		We are not convinced there is enough public open space to serve the area once densification takes place. Better links connecting the company's garden would be welcomed .	Amount of POS questioned	Implementation plan to make provision for a specific audit of public spaces and an activation plan.
377		Land alongside the Iziko gallery could be turned into a wide pathway to be in line with the desired Gardens pedestrians network . The existing link on the other side could be repurposed.	new NMT routes suggested	Clarity will be provided in the LSDF as and when available.
378		With Public works calling for comments on the rebuilding of parliament , we would welcome the city to advocate for east-west links. For far too long the parliament precinct has blocked pedestrian migration across the central node of the city centre.	East west connections via parliament for better NMT	Clarity will be provided in the LSDF as and when available.
379		Culemborg - We are concerned that the LSDF has excluded a significant area of opportunity – the rail and harbour yards , which cover vast tracts of land. Numerous urban design proposals have been developed by professionals for this strategic corridor, which stretches from the CBD towards the M5. These yards present a unique opportunity to unlock well-located land, which could help address the spatial disparities that persist due to apartheid-era planning. Incorporating this corridor into the LSDF would dovetail with ongoing efforts to integrate these underutilized spaces into the existing urban fabric, connecting them to surrounding areas . This integration would not only create much-needed access to centrally located land but also serve as a catalyst for broader urban regeneration, contributing to a more inclusive and sustainable city. Political climates changed since the first public engagement 9 September 2023. With the national agenda, particularly the new Minister of Public Works' focus on turning South Africa into a "construction site," there is a real momentum to tap into the rail and harbour yards could be part of this larger vision, bringing together public and private sector energy to reinvigorate this space. We recommend that erf numbers such as 164070-RE and other similarly positioned areas be included in the LSDF to maximize the potential for development and equitable access to land.	LSDF to include Culemborg	Clarity will be provided in the LSDF as and when available.
380		Dunkley square - There is an intention to convert parking lots into green spaces. That might also include Dunkley Square, which hosts a hotel and several restaurants/food outlets (Ikhaya Lodge, Maria's Greek Café, Roxy Late Night...), all of which would be affected along with live-in residents. Ikhaya would at least need a luggage drop-off area and general parking nearby. Whatever plans are made, more detailed conversations should be had with all who would be affected. Rather than converting it into a park, the square could be made more attractive by planting trees (to replace those that have died) and replace the seating benches that were once there.	Dunkley Sq proposals	Clarity will be provided in the LSDF as and when available.

381		Urban Density - One of the planning goals is to urban densification and the making affordable housing in the city centre available. Our initial concern was how the raising of building height restrictions would impact the views of the mountain from Dunkley Square. After reviewing the plans, it seems the impact would be minimal. There are some spots in line with Lion's Head where heights up to 60 metres, but these are the other side of the Company Gardens. The intention is to restrict high-rise developments such that they do not encroach upon historic areas or extend towards the mountain. Most new development would be on the CBD periphery (where, unfortunately, much some of the most suitable land is privately owned, e.g. Transnet). While the goal of providing low-income housing is laudable, there may be unintended results. If badly managed, the blocks could kill the goose that laid the golden egg. The CBD could decay, causing businesses and others to flee (as has happened in Johannesburg, Durban, Pretoria and elsewhere). Alternatively, the units could be taken over and developed further by higher-income individuals. This would all depend upon the size and location of the residences.	Views from Dunkley Sq mountain if heights increase. Problems with risk of affordable housing.	Clarity will be provided in the LSDF as and when available.
382	Raymond Anderson	Accessibility - The transitional plan is long term and may take 10 to 50 years to realize. It is general and focuses on spatial use with a focus on diversity and inclusivity, e.g. allowing for affordable housing, green spaces, etc. A criticism is that it seems to envision a node created for the people living and working there and does not accommodate well for people coming from other areas whether for business or shopping. Yes, the rail network might get people into the city centre, but then moving about the centre is difficult. The intention is to make the city needs more pedestrian and cycle friendly. There is, however, little or no mention of connections from the CBD to other suburbs. The cycling network is such that some sections are safe but others not. For example, there is no way to cycle easily say from Claremont to the CBD without having to endure Main Road in Salt River. While the idea of limiting traffic is good, there will be issues with taxis and others that do not obey the rules of the road. Visible policing would help. South Africans tend to be lazy when it comes to walking. Motorists and taxis try to get people as close to destinations as possible, with little regard for others on wheels. Designated drop-off zones should be provided. If certain streets are to become pedestrian zones, perhaps a frame network could be installed there to aid individuals that are less mobile. I am Canadian, a country renowned for its severely cold winters where city centres are often connected by underground passages or above ground skywalks. I went to university in Calgary, the centre of which is connected by skywalks and most shops are not street level but first-floor. It can help greatly to move pedestrian traffic up of down from street level, especially for busy streets. The added advantage is that they are protected from Cape weather.	Accessibility - The transitional plan is long term and may take 10 to 50 years to realize. Idea of limiting traffic is good, there will be issues with taxis	Implementation plan to make provision for a specific drop-off zones is available from MAP otherwise will be included as follow up action in the IP.
383	WCED (Western Cape Education Department)	the WCED notes the proposed increase of residential units from both private and public sector housing developments by 2040. This will impact the number of educational facilities required to service the proposed population living in the Cape Town CBD as existing facilities in the subject area and neighbouring areas will be insufficient to meet the proposed demand based on the strategies in the LSDF. Based on the proposed land use maps shown in the document there is no land allocated to accommodate new educational infrastructure in the traditional model of educational facilities therefore it is imperative that future land use approvals of development include mixed use zoning that are able to have community uses in order to implement a different model of educational facilities.	Existing EDUCATION sfacilities in the subject area and neighbouring areas will be insufficient to meet the proposed demand based on the strategies in the LSDF	Development Guidelines in LSDF to be clear about obligation in case of mixed and specifically residentially dominant land uses.
384		Reference to Founder's Garden/ Artscape – should be throughout the document – Pg 52, 59, 121, 124 etc	Pg 52, 59, 121, 124 et. Volume 1: Contextual Analysis Pg 40 Public facilities last bulletc	Ensure Implementation plan and other parts of the LSDF includes reference to Founder's Gardens

385	WCDOl (Western Cape Department of Infrastructure)	Founder's Garden 20 storeys , (+60m), 60m and 70m towers. Erosion of recreation space or perceived public open space. e.g. Artscape complex to include Zip-Zap Circus partly introducing into public realm, also intention to activate the public realm - Estimated Yield # of units is 2200 not 1785, Density is 1004 units per hectare, Max building height is 73 m for East Tower and 59m for North Tower. Recreation Space is note being eroded as that space is not available to the public anyway, and there will be a substantial park accessible to the public, as well as the Artscape Plaza which is to be activated by the Zip Zap Circus building.	Volume 1: Contextual Analysis Pg 58 Table 6: Building development observations & variances across identified CBD precinct	Update Government land Table and Implemenation Plan text with proposals for public open space and other spaces which can be activated for markets and outdoor recreation
386		Prestwich Precinct Erven 734 & Rem. Erf 738 – incorrect extent, yield and status - Extent of WCG sites: 5496m² Yield: Uncertain Status: Land use management application for site and portions of City owned de-proclaimed Buitengracht Road reserve submitted on 20 August 2024	Volume 1: Contextual Analysis Table 7 Pg 61 Prestwich Precinct Erven 734 & Rem. Erf 738	Update Government land Table and Implemenation Plan
387		Foreshore East sites Rem. Erf 154 & Erf 155, Roggebaai - unsure if this is the parking at Founder's Garden/ Artscape?	Volume 1: Contextual Analysis Table 7 pg 61	Update Government land Table and Implemenation Plan
388		Founder's Garden extent missing and yield incorrect - Land Area is correct (21916m²), Estimated Yield # of units is 2200 not 1785, Density is 1004 units per hectare, Max building height is 73 m for East Tower and 59m for North Tower	Volume 1: Contextual Analysis Pg 61 Table 7: Summary of public sector development projects in the immediate vicinity of the CBD	Update Government land Table and Implemenation Plan
389		PGDW incorrect - PGWC or WCG Department of Infrastructure. PGDW is also in the process of programming its Prestwich Soil Lab site for development	Volume 1: Contextual Analysis Development Desirability pg 118:	LSDF Doc
390		Founder's Garden Precinct - Reference to Founder's Garden/ Artscape – should be throughout the document -Pg 36, 101, 120	Volume 2: LSDF Pg 26 Founders Garden	LSDF Doc
391		Is this the parking at Founder's Garden/ Artscape?	Volume 2: LSDF Table 5-3: Schedule of public land development opportunities Pg 57 B1 Foreshore East sites (Rem. Erf 154 & Erf 155, Roggebaai)	LSDF Doc
392		B2: Prestwich Precinct (Erven 734 & Rem. Erf 738, (Soil Lab site) – incorrect extent, res, density, comm and status TOTALS WILL ALSO BE INCORRECT - Extent of WCG sites: 5496m² or 0,55 Res (units): 156 – 174. Extent of WCG sites and road reserve together: 6690m² or 0,67 Extent of res (units): 310 Density: uncertain Comms: 3432m² floor space Status: Land use management application for site and portions of City owned de-proclaimed Buitengracht Road reserve submitted on 20 August 2024	Volume 2: LSDF Table 5.3 pg 57	Update Government land Table and Implemenation Plan
393		Estimated Yield # of units is 2200 not 1785 , Density is 1004 units per hectare, Max building height is 73 m for East Tower and 59m for North Tower.	Volume 2: LSDF Table 5-3: Schedule of public land development opportunities Pg 57 B1 Foreshore East sites (Rem. Erf 154 & Erf 155, Roggebaai)	Update Government land Table and Implemenation Plan
394		B4 Leeuloop: incorrect extent , yield and status - Land Area is 2881m2 - not 3853, Estimated Yield # of units is 853 (±490 Open Market & 363 Social Hsg) - not 341, Density is 2961 units per hectare, Maximum height is 65m	Volume 2: LSDF Table 5-3: Schedule of public land development opportunities, Pg 58 B4 Leeuloop	Update Government land Table and Implemenation Plan
395		B5 Provincial Garages Site 1 (Erf 95948): Comment on extent, res, yield and status - Best Use Study currently underway. Potential yield (within existing zoning) of 32,580m² GLA, comprising residential (FHF, Social and Open market), Retail, Commercial/ Office and Government land uses. Preliminary potential residential yield (FHF, Social and Open market) – 555 units.	Volume 2: LSDF Table 5-3: Schedule of public land development opportunities, Pg 58 B5 Provincial Garages Site 1 (Erf 95948)	as above
396		B6 Provincial Garages Site 2 (Erf 95826): Comment on extent, res, yield and status - Extent is 5737m², not 5,682m². Best Use Study currently underway. Potential yield (within existing zoning) of 22,949m² GLA, comprising residential (FHF, Social and Open market), Retail and Commercial/ Office land uses. Preliminary potential residential yield (FHF, Social and Open market) – 376 units.	Volume 2: LSDF Table 5-3: Schedule of public land development opportunities, Pg 58 B6 Provincial Garages Site 2 (Erf 95826)	as above
397		B7 Provincial Car Park (Erf 96174): Comment on extent, res, yield and status - Best Use Study currently underway. Potential yield (within existing zoning) of 46,488m² GLA, comprising residential (FHF, Social and Open market), Retail and Commercial/ Office land uses. Preliminary potential residential yield (FHF, Social and Open market) – 780 units.	Volume 2: LSDF Table 5-3: Schedule of public land development opportunities, Pg 58 B7 Provincial Car Park (Erf 96174)	as above

398		Lower Gardens Precinct, Precinct: Comment on “up zoning” of Erven to 95948, 95826 and 96174 to Mixed Use 3 allowing for height ranges up to 38m - Potential development charges likely to be imposed as part of rezoning likely to be prohibitive, significantly impact on overall financial viability of future development and would need to be considered. Furthermore, the location of several heritage buildings and sites on and within the proximity of the three erven implies the need for relevant design setbacks and stepping requirements, which will to some degree negate potential yield as part of a new Mixed Use 3 zoning	Volume 2: LSDF 5.6.4 Lower Gardens Precinct, Precinct-based development Guidelines, p 99	Clarity will be provided in the LSDF as and when available.
399		Yellow blocks indicating B2 are incorrect - B2 only refers to one of the blocks, only PPTL is available for enablement at present. The Primary School is functioning, and the multi-storey building is presently being used for various WCG and SAPS functions	Volume 2: LSDF Figure 5- spatially reflects this schedule pg 55 Figure 5-16: Potential public land development opportunities within Cape Town CBD. pg 62	Government precincts Table and Implementation Paln to be corrected
400		A key idea that came through the contextual framework participation, in 2023, was the idea that the CBD should improve the public realm for a more walkable, pedestrian and bike friendly city . Non-motorized forms of transportation in large Cities is the future and this should encouraged as it makes moving around the CBD convenient without adding CO2 emissions. The look and feel of Short market Street is good example, however concerns are to be noted as the type of street vendor must complement the existing shops along the street as very often this is not the case resulting in direct conflict of interest. i.e. selling same or similar products. Public Transit streets are encouraged as the city is already locked at various times during the days, however - commuting to the City must be complemented with parking on the periphery or strategic places	Informal trade is in direct conflict with formal business by offering the same products. Parking is required on the periphery or strategically located sites.	Implementation plan and development guidelines to be updated once clarification has been obtained from line departments with proposals
401		B. The global height map shows a very long-term view , directing height to the foreshore. Do you have strong views on this high-level policy direction, and do you have recommendations, refinements, alternative views ? Tall buildings do address the land shortage and related engineering services; however, Skyline must be preserved as far as possible as the City is a global tourist destination	Skyline must be preserved as far as possible as the City is a global tourist destination	Development guidelines to provide for if required
402		Aligned to the previous comment on height, these proposals/guidelines must be sensibly reviewed in respect of densification and its impact, i.e. how services are managed in addition to traffic motorized and non-motorized moving into the city and within the City. Avoid the Salt and Peper Towers scenario in the Gardens	Avoid the Salt and Peper Towers scenario in the Gardens. Development Guidelines should point towards priciples or timelines for long term ultimate height implications and impact on engineering services.	Development Guidelines to suggest medium to long term implications or review to ensure infrastructure planning is keeping up with overall development trends
403		The contour approach is a good approach to protecting the very sensitive skyline with Table Mountain backdrop.	Support contour approach	Include in Development Guidelines
404		In support of review of the overlay zone - it will likely end up being more aligned with current market demands	Overlay Review supported	Overlay Review supported
405		Do you have input on parking minimum's and maximum's? Data is available and can be shared going forward. Targeted parking ratios will need to be built specifically and the position depending on alternate transport modes proximity.	Parking minimum's and maximum's?	Development Guidelines and Overlay Zone review should incorporate views from Transport Planning re dealing with parking max..?
406		The requirement of wrapping structured parking on key streets generally comes at a cost to developers with no tangible return	Wrapping structured parking has a financial feasiblity impact on developers.	Development Guidelines and Overlay Zone review should incorporate views from Transport Planning re dealing with parking wrapping.
407		In agreement with the meeting outcome that separate sessions were going to be held November 2024 to March 2025 with respective property owners	Public participation process and focus group sessions appreciated	No change to LSDF Doc
408		Open to conversation of parking to usable spaces and currently a recommended clearance height is +/- 2,75m for commercial spaces	Height stipulations for parking garages	Development Guidelines for LSDF to include height stipulations for structured parking
409		Providing bike spaces is only a part of the solution - as per earlier conversations the infrastructure needs to be aligned to improve usage. i.e. if safe parking is provided on the periphery, then bike could be a method of movement within the city limits.	Bicycle strategies to be comprehensive of parking in association with treatment of vehiclar parking	Development Guidelines and Implemenation Plan for LSDF to include proposals for bicycle parking locations or investigations to be undertaken.
410		Are there views on a CBD parking strategy? What is the city introduced Parking maximums ? This is a conversation that requires unpacking as there are a number of strategic solutions that triggers different actions/ responses.	Parking strategy unclear in the light of zero parking requirements.	Development Guidelines (LSDF and Overlay Zone) and Implementation Plan to provide principles of parking strategy or incentives/ quit pro quos.

411	Marc Jacobs (Redefine - CCID board member)	Are there specific design related engineering and architectural specifications solutions being considered in your property portfolio in terms of climate change and adaption? Water security is being addressed through interventions at existing property and considered in new build design and delivery. Improvements in the design to more energy and resource efficient over and above current industry standards Water reduction and re-use strategies including the need for every commercial property to be fitted with leak detection mechanisms, low-water consumption flush toilets, and aerator taps. Mandatory installation of motion detection/heat detection lighting in all covered parking areas, but with a set minimum luminescence level during office hours – this has been shown to reduce electricity consumption drastically. All new commercial properties to encompass water harvesting and greywater usage (at a minimum), and as we progress closer to 2030, some form of black water treatment. Waste management and waste separation at source for all commercial properties. Introduction of building rubble refurbishment/recycling levels for all commercial building operations. All industrial buildings roofing structures to incorporate some form of skylight system – (I know that this is not necessarily practical, but some bright spark can come up with a solution). Create areas within developments to act as water sponges within a certain block radius, thereby slowing water run-off. Reduce borehole water usage to prevent water tables being depleted faster than they can re-fill and minimize the chances of sinkholes and ground collapse due to the weight of the water not being there to support ground weight above it as it is extracted. Increase necessity of landscaping around buildings to reduce the effect of heat islands All new commercial properties air conditioning units to be mandated as low energy, low or no water usage Electric geysers are to be fitted with remote on/off switches and curtail the use of hydro <u>boils in office kitchens.</u>	Climate change adaptation development guidelines already in use	UPD
412		What improvements the city is planning around Wembley Square in respect of cycling lanes (connecting with the foreshore), layby areas and MyCity terminal along our property?		
413		Is the land between Mill Street and Wembley Square council owned and if so, what are they planning to do with that land?		
414		What is the CCT plan with developing the plaza over the Hertzog Boulevard entrance to the basement located between the Towers and the Civic Center? It's a wind tunnel that is <u>rendered unusable for large parts of the year due to high wind velocity</u>	Plaza over Hertzog Boulevard entrance to basement to reduce wind tunnel velocity	Include in Development Guidelines related to climate adaptation.
415		Are we at maximum height on CBD buildings and what is the CCT view on increasing parking restrictions to reduce congestion in the city. i.e. faster access for emergency vehicles?	Parking maximums as strategy for congestion relief	Development Guidelines (LSDF and Overlay Zone) and Implementation Plan to provide principles of parking strategy or incentives/ quit pro quos.
416		The Heritage council process and sites – how it influences developments, currently the process is elongated and costs developers time and ultimately money – and in instances lost opportunity	Time and cost implication of heritage processes	Development Guidelines in LSDF and Overlay Zone Review
417		Height restrictions for developers, this is to be carefully considered	Heigh restrictions need to be considered before decision	Include in Development Guidelines in LSDF considering quit pro quo arrangements and incentives
418		Parking ratios vs pedestrianized requirements without losing the commercial opportunity	Parking strategy unclear in the light of <u>zero parking requirements.</u>	Development Guidelines (LSDF and Overlay Zone) and Implementation Plan to provide principles of parking strategy or incentives/ quit pro quos.
419		Lack of parking and the impact on businesses attract the correct talent.	Parking strategy unclear in the light of <u>zero parking requirements.</u>	Development Guidelines (LSDF and Overlay Zone) and Implementation Plan to provide principles of parking strategy or incentives/ quit pro quos.
420		Better management and allocation of areas and amenities for uber delivery motorcycles/e-hail and other transport related services	Need policy position and guidelines dealing with metred taxi and last mile delivery serves	#REF!
421		The committee is supportive of the document's general intent. 1.To encourage the densification in the Cape Town CBD in a considered manner. 2.To give “clarity and confidence” to developers and the market.	Residential densification in CBD Support. Developers need to get clarity and confidence	Development Guidelines and Implementation Plan
422		The document achieves a good level of detail with integration of multiple parameters, represented in the precinct maps.	Appreciate precinct maps	Consider to keep precinct level maps
423		Heritage concerns are acknowledged as one parameter but are given due consideration.	Heritage to be sorted out	Development Guidelines and Implementation Plan
424	Heritage Western Cape (Inventories, Grading and	Elements of intangible heritage and public memory must be enhanced (e.g. District 6).	Intangible heritage to be enhance	Development Guidelines and Implementation Plan

425	Grading and Interpretation Committee (IGIC) and the Impact Assessment Committee (IACom).)	The map illustrating the proposed CBD HPOZ (Figure 5-21, p.73) should be revised to include the following information: oHeight map - perhaps as a 3D (as per Figure 5-20, p.73). oCape Town CBD Local Area Overlay (LAO/4) oCape Town Urban Development Zone (UDZ)	Map revisions to show different heights for 3D, LAO/4 and UDZ	Incorporate height stipulatesion in Development Guidelines for LSDF vs Overlay Zone Review
426		The relationship between the Central City HPOZ and the proposed heritage clusters must be clarified.	HPOZ vs Heritage Clusters	Incorporate height stipulatesion in Development Guidelines for LSDF vs Overlay Zone Review
427		The proposed Heritage Management intervention suggests that the HPOZ would fall away, "...in favour of defined heritage sensitive character areas... " (p.131). This would be a concern.	If HPOZ replaced with heritage clusters it will be a concern	Incorporate height stipulatesion in Development Guidelines for LSDF vs Overlay Zone Review
428		No HPOZ has been declared since the 1990's although it is understood that there are numerous HPOZ's that have been in a 'proposed state' for a number of years, these areas should be formalised by the City of Cape Town.	HPOZs are unclear to HWC	Incorporate height stipulatesion in Development Guidelines for LSDF vs Overlay Zone Review
ITEM No.	ORGANISATION TYPE (received via email)	COMMENT	SUBJECT	RESPONSE (to be publicly published)
429		Page 25; 5.1 Public realm structure - Informal Traders need to be considered . We need more semi-permanent structures for informal traders as there self-built structures are not safe, especially in windy and storming weather conditions. Informal traders also block many pedestrian-used pavements (high traffic zones) and this needs to be considered; <u>especially in a "pedestrian first" city centre.</u>	Informal Traders need to be considered	Informal trading strategy and policy in the CBD needs to be reviewed but will be understaken outside of the LSDF but included in the Implementation Plan
430		Page 25; 5.1.1 Green Spaces - i. Company Gardens Kindly consider below suggestions. Company Gardens could highly benefit: An African specific traditional medicine garden (herbal); honouring the Khoi-San heritage. Wine tasting events, featuring wine farms from the surrounding areas. Could draw larger crowds and tourists to the park. Especially if done on a rotational basis, where every 2-months a new wine farm is featured. This could generate additional income to the city/park. The park can host the events and either charge an entrance fee or supply "cheese boards" / snacks. If this is not feasible, the events department could look into a Wine Festival style event, annually. Upgraded and improved pavements — similar to that of Greenpoint Park Functioning water fountains - Additional Art & sculpture installations. Especially considering the - National Art Gallery and National Museum are both located here. Establishing a body comprising of local residents for the assistance in control and management of the park. - Additionally, our monuments and places of significance require <u>signage</u> . <u>Our city lacks inclusive signage</u>	Proposals for new markets and activation of spaces, als noe water fountain locations. Proposals for citizen's engagement in park management. Propose new signage required	Implemenation Plan may include certain proposals once discussed with line departments
431		Page 26; 5.1.1 Squares - i. Grand Parade & iv. Greenmarket Square - Again. Informal traders need formal structures - Areas need better curation and variety, so that locals and tourists can support the markets Street-Food-trucks are found all over major cities in the world, even in unexpected cities like Venice, and our CBD lacks this.	Grand Parade and Green market Sq need better curation and variety. Need more food trucks in CBD	Implemenation Plan may include certain proposals especially for key public space improvements but also proposals for Implementation partners to enhance space activation.
432		Page 45; 5.2.4 Public Transport - Minibus Taxi - MBT needs demarcated zones / bays for commuter drop-off . Public transport should take priority and private vehicle parking bays should be converted.	Taxi drop offs to be agreed upon.	Maybe Development Guidelines should refer to the requirement for embayments to be designed into road function at time of property redevelopment
433		Page 49; 5.2.6 Pedestrian movement network - We need wider pavements ("sidewalks"); especially in the "old part" of the mid-city . Many roads have very narrow pavement for pedestrians to walk; forcing us into the street. Examples are: ADDERLEY (pavements here are too narrow!), Longmarket, Shortmarket, Castle, Hout, Lower Plein & Parliament Streets.	Pavements in the old part of CBD needs to have wider pavements. See examples	Maybe Development Guidelines should refer to pavement widths in the historic core.

434	Ruaan Du Plessis	Woonerf streetscape applications Identified 'Woonerf' treatment areas can include: The section of Parliament Street from Spin to Darling, as it runs into the pedestrianised street behind the old Standard Bank building and many pedestrians (commuters) use Parliament street, walking from Golden Acre, to access Government Avenue to go to the suburbs. Parliament St also runs along Church Square, restaurants and cafes and four apartment blocks & a hotel, which all use The Adderley Parkade as parking... all these residents then walk from the parkade to their buildings. Parliament Street also intersects with Longmarket Street, which is a proposed future pedestrianised street.	Wooneft areas to be expanded (see examples).	LSDF Doc may be amended to include these suggestions after consideration
435		Once the Golden Acre centre closes in the late afternoons , then commuters are “forced” to take Lower Plein via Darling or Strand. Both these routes do not offer conducive space for all the pedestrians as the pavements are made narrower by informal trading structures, there is high volumes of motorised traffic, including busses during the peak hours and these streets offer little safe pedestrian crossings.	Pedestrian problems once Golden Acre closed.	Development Guidelines
436		The LSDF has no mention of increasing public toilet facilities??	Not enough said about public toilets	May consider changes in the Implemenation Plan
437		Not addressing noise pollution Please allow for precincts that specifically cater for larger residential apartments for families. Micro-apartment developments are not conducive to supplying housing to local residents as they are being used for short-term lets and can only house couples or single occupants.	More family units and less micro-units.	Development Guidelines to be clear on preferred policy position.
438		Informal traders: Many informal traders cause traffic congestion and risk injury to pedestrians by carting of goods & structures along pavements and in roadways. Instead of having “ storage areas” for informal trader’s structures, why can we not have semi-permanent structures for them? This was they will not be required to cart all their structures around pavements and in the roadways, causing traffic congestion, being at risk of injuring pedestrians by swinging around long steel poles or the structures collapsing in inclement weather. PLUS it would look better!	Provide permanent trading areas for traders in stead of storage elsewhere and cargin items around	Implementation plan may have to be updated with relevant proposal.
439		2) Extortionists	Cape Town CBD challenges	LSDF cannot make proposals for law enforcement
440		3) Noise pollution from night-clubs!!!		LSDF cannot make proposals for law enforcement
441		4) Not enough family friendly residential units. Too many micro-apartments.	as above	as above
442		5) Not enough public toilet facilities		as above
443		6) Missing plaques and signage on monuments and heritage significant places	Signage and way finding	Implementation plan may have to be updated with relevant proposal.
444		7) Loss of character. Street bollards, street lights and litter bins should be uniform and conform to heritage aspect.	Place making and character not clear	Implementation plan may have to be updated with relevant proposal.
445		Business retention, facilitation of private investment and growing job opportunities , Collaborative precinct management, More efficient regulation of development, Pedestrianisation and public realm improvements, Residential intensification	objectives which will contribute to the transformation of the CBD	These suggestions support the vision for the LSDF area in the LSDF Document
446		I am encouraged to see how the focus has pivoted to a people-orientated CBD as opposed to a car-orientated CBD. Pedestrianisation should be at the core of any development framework for the CBD. We also need to acknowledge that the City budget allocation and infrastructure investment in the CBD appears inadequate and unfairly allocated given the massive economic contribution of the CBD. The CBD is the heart of the Cape Town economy, and this should be reflected in the budget allocation and planned infrastructure projects for this area	Pedestrianisation is key. Budget provision for the CBD is inadequate.	These suggestions support the vision for the LSDF area in the LSDF Document
447		The CCID should receive funding in the form of a City grant to substantially increase their service offering. The City's allocation of 100 Law Enforcement officers was long overdue and should be doubled to support the growing CBD.	CCID should receive more funding to expand services	Implementation plan may have to be updated with relevant proposal.
448		Pedestrianisation – this should be encouraged in many parts of the CBD. Long Street should absolutely be pedestrianised. Upper Adderley has become very congested and should also be pedestrianised. Longmarket should follow the example of Shortmarket. Lower Plein Street should also be pedestrianised.	Pedestrianisatoin to be promited in Long street, Upper Adderley, Long market, Shortmarket, Lower Plein	Implementation plan may have to be updated with relevant proposal.
449		Pavements – these should be widened, and all should be upgraded to brick paving where they are currently tarred. More bump outs, landscaping, greening and tree planting should be invested in throughout the CBD. There are many tree wells which need planting, and this should be prioritised and greatly expanded to help green the city.	Pavement improvements with more tree planting suggested	Implementation plan may have to be updated with relevant proposal.

450	Gabriel Miller	Pedestrian Crossings – these should be more clearly defined, with paving below the pedestrian crossing and bollards / signs to slow traffic. Traffic light crossings should be recalibrated to give more time to pedestrians. These should include a visible timer as is common all over the world. Parking Bays and Reduced Car Lanes – these should be removed in many places where wider pavements would be far more beneficial. Examples include many sections of Bree, Loon, Riebeeck street.	Pedestian crossing design features to improve and pavement proposals to be consider	Implementation plan may have to be updated with relevant proposal.
451		Trams – the city should look into the feasibility of a PPP. This could be a great way of reducing vehicular traffic and encouraging environmentally friendly, people-centred transport. A congestion charge could also be implemented if the CBD has a modern tram system to largely substitute car use.	Tram to be incestigate	Implementation plan may have to be updated with relevant proposal.
452		Foreshore Freeway – encouraging to see that this is being relooked at and should be a priority for the City to get off the ground given the opportunities which exist. A promenade board walk and connection to the sea in the Foreshore area should be a key goal of this project.	Foreshore development is supported and to be prioritised wit board walk connecting sea and foreshore.	No changes required
453		Informal Trading – these allocated spaces should be formalised into built trading structures which can act as an art canvas or digital advertising boards to generate revenue for the city. There are also too many informal trading spaces on pavements which do not nearly have enough space for them. It clutters the pavement and hinders pedestrians and contributes to a feeling of untidiness in the city.	Informal trade should be formalised	Implementation plan may have to be updated with relevant proposal.
454		Harbour Arch – the first phase of this project is an example of what this framework document seems to discourage. The rest of the project should have to align with the key principles in this document and contribute to a positive urban environment at grade and an iconic, visually pleasing skyline.	Note concerns re Habour Arch	No changes required
455		Building Height – an iconic skyline should be encouraged and there are areas where building heights of around 150m-200m should be allowed	Height suggestions to be considered	Suggestion will be considered
456		Riebeeck Square – this should be converted into an urban park asap. It is bewildering that this historic space has been a parking lot for so long. Developers – should have to make contributions to public improvements in the immediate surrounds of their developments.	Riebeeck Sq should be an urban park as suggested in the doc	none
457		Grand Parade and Bus Station – at the moment the Grand Parade is basically just a large, paved area. This could be an iconic, landscaped urban park, loads of trees, seating areas etc. There should also be a grand direct link to the station and taxi deck from the parade. Adderley / Strand Intersection and Station Entrance – needs significant improvement, and I am pleased that this is addressed in the framework.	Grand parade need a significant improvement and support what is in the LSDF	none
458		As mentioned above, largely centred on: - unfair budget allocation - inadequate investment in pedestrian infrastructure and the urban environment - below par law enforcement presence - car centric city with not enough pedestrianised roads - congestion - taxis disobeying road markings and double parking as they please	Inadequate budgets for urban quality improvement and pedestrinasation. Need more law enforcement re taxis.	Suggestion will be considered

459	Lisakhanye Feni	I would like to offer my comments on the draft Cape Town Central Business District (CBD) Local Spatial Development Framework (LSDF), specifically focusing on the implications for transport planning. Firstly, addressing public transport needs is crucial. From my observations and discussions with local residents, it's clear that there are significant challenges with the current public transport system. Many people have expressed concerns about the reliability and coverage of existing services. Engaging with the community to gather more detailed insights into these issues and their suggestions for improvements would be beneficial. This engagement would ensure that any enhancements made are aligned with the real needs of the people who rely on these services daily. Regarding non-motorised transport (NMT), I believe it's essential to prioritize the creation of safe and accessible pathways for pedestrians and cyclists. The current infrastructure often feels inadequate, with many routes lacking the necessary facilities to ensure safety and convenience. Investing in well-designed sidewalks, dedicated bike lanes, and secure bike parking would greatly support these modes of transport and encourage more people to use them. Finally, it's important to emphasize the need for integrating transport planning with broader urban development goals. The success of the CBD's transport system hinges on how well it aligns with overall urban development strategies. A cohesive approach will not only improve mobility but also contribute to a more efficient and vibrant urban environment. Coordination between transport and development plans will help create a seamless movement system that enhances the overall functionality of the CBD. Thank you for considering these perspectives. I look forward to seeing how the LSDF evolves to address these critical aspects of transport planning.	Volume 1, Page 32, Paragraph 3.2.7 Engage local community to understand why they think public transport is not working. Safe pathways to be created for cyclists and pedestrians. Need pavement, bikeline and safe bike parking areas.	Suggestion will be considered
460		I want to address several additional challenges facing the Cape Town Central Business District (CBD) as highlighted in the draft report. One significant concern is the lack of visible law enforcement, which contributes to higher crime rates and makes the area less attractive to both residents and businesses. Enhancing security measures and increasing visible policing are crucial steps to improve safety and restore confidence in the CBD. Another pressing issue is environmental pollution, particularly noise and light pollution from nightlife and entertainment activities. These problems are affecting the quality of life and deterring potential residential growth. It's important to find a balance between maintaining a vibrant nightlife and addressing residential needs. Implementing strategies to manage and mitigate pollution will help preserve the CBD's appeal and livability.	Law enforcement need attention Noise pollution at night is an issue	May consider changes in the Implementation Plan
461		Public space management is also a critical challenge . Many public spaces are underutilized or poorly maintained, leading to a decline in their functionality and vibrancy. Investing in the maintenance and revitalization of these spaces is essential to make them <u>more inviting and functional for all users</u> .	Lack of public space management	May consider changes in the Implementation Plan
462		The existing transport infrastructure often creates barriers within the urban landscape, limiting accessibility and mobility. Improving connectivity and integrating transport systems will help overcome these segregation issues and enhance movement within the CBD.	More connectivity and integration is required in the transport system	LSDF and MAP project combination tries to address this
463		Finally, the presence of homelessness and aggressive begging creates a perception of disorder, impacting the cleanliness and safety of the area . Addressing these social issues with compassion and effective support services is important for improving the overall environment of the CBD. Addressing these challenges is crucial for achieving the CBD's objectives and ensuring a thriving urban space. I hope these points are considered in the <u>ongoing planning and development processes</u> .	Homelessness people creates perception of disorder and unsafe environment.	May consider changes in the Implementation Plan
464		To tackle safety and security concerns, the LSDF should incorporate Crime Prevention Through Environmental Design (CPTED) principles . This involves promoting well-lit public spaces and encouraging increased foot traffic to enhance safety . By focusing on these aspects, we can create an environment that naturally deters crime and improves the <u>sense of security for both residents and businesses</u> .	LSDF should consider crime prevention through design	Concepts already included in Implementation plan details

465		Regarding environmental pollution, the LSDF can play a pivotal role by promoting the development of green spaces and sustainable urban design practices . This approach will help mitigate noise and light pollution, contributing to a healthier urban ecosystem and <u>enhancing the overall quality of life within the CBD</u> .	Promote green space development	The document is strongly promoting these ideas already
466		Public space management is another area where the LSDF can make a significant impact. The framework should include specific guidelines for the maintenance and activation of public spaces , ensuring they are vibrant, accessible, and well-utilized. By addressing these aspects, we can revitalize underused areas and create more dynamic and engaging <u>public environments</u> .	LSDF Should include proposals and guidelines for public space maintenance and activation	The document is strongly promoting these ideas already, but some ideas may be considered.
467		In terms of transport infrastructure, the LSDF can propose integrated transport solutions that improve connectivity and accessibility across the CBD. This includes enhancing public transport routes and facilities , as well as supporting non-motorized transport options like cycling and walking. Such improvements will help to overcome current segregation issues and facilitate smoother movement within the urban landscape	More cycling and walking to integrate with public transport	Concepts already included in Implemenation plan details
468		Finally, to address homelessness and related social issues , the LSDF can recommend the development of social programs and partnerships with NGOs. These initiatives should focus on creating safe spaces and providing support services that integrate vulnerable populations into the community . By taking a compassionate and comprehensive approach, we can work towards improving the overall environment and inclusivity of the CBD.	Safe Places need more attention	Implementation plan may have to be updated with relevant proposal.
469		Affordable housing opportunities, Business retention, facilitation of private investment and growing job opportunities, Collaborative precinct management , More efficient regulation of development	Affordable housing, Business Retension, More private Sector investment, Collaborative precinct management	Implementation plan may have to be updated with relevant proposal.
470	Max Melvill	Third Spaces/ FreeSpace as community builders: Mandate the inclusion of community/ public programming (through an adjustment to BDM/ LUMs requirements) in all future medium/ large scale builds across the city. Image every new development brought with it an allocation of programmable space designated to community/ public use. e.g. a shopping centre is build with a public gym, a residential block has a public library space etc etc. References: - 'Freespace Manifesto' by Yvonne Farrell and Shelley McNamara - 'Third Places' (as defined by Ray Oldenburg)	Develop a quit pro quo arrangement where developers contributes to the public good once they get enhanced rights. CBD_LSDF_Volume2 , 5.1 Public realm structure	The concept was already available in the 60-day comment version of the LSDF but will be expanded and re-emphasized in the next public consulation process
471		Affordable housing opportunities, More social facilities, Pedestrianisation and public realm improvements, Residential intensification	Affordable residential opportunitites. Pedstrian intensification	Already addressed above
472		The documents in the CBD LSDF total 362 pages with references to many other reports, totaling over 60MB file size. To expect a comment in 4KB and not to allow the upload of documents is insulting and typical of the arrogant and asymmetric attitude of the City to its citizens. We have no other option but to publish our opinions elsewhere.	Uploading and email was arranged for submission	Arrangements has been made during the previous public process.
473		Refers to the Cape Town CBD Transition Plan Contextual Analysis, Cape Town CBD Transition Plan Local Spatial Development Framework, Annexure A: Urban Design related conceptual diagrams and indicators 22 July 2024, and the State of Cape Town Central City Report 2023 These documents alone total 362 pages , excluding the numerous other reports that they reference, to the extent that I felt like poor old Cecil (of Rhodes must fall fame) who said "so much to do, so little done" when I was faced with their tsunami of words, tables and images. I trust that the authors did not waste their time or our money on their preparation but entrusted the composition of the reports to generative artificial intelligence. However, I will attempt to use real intelligence in my brief response.	Document too long	note
474		To do this, I searched the documents for the words economy and strategy to help focus on those aspects in which I have an interest. While they were often used, I found no material that provided a holistic understanding of the economic future of Greater Cape Town. It seems to me that to analyse the CBD alone, without such context, does not make sense, so I will attempt to provide one with my limited knowledge.	Focus of economy and strategy not strong enough and not enough reference to CBD in context of CT	Minor improvements may be made to Vol 1 if required

475	Christopher Marshall	In 1970, Alvin Toffler introduced, in his book Future Shock, the concept of megatrends, since used by strategists to explore future scenarios, which is safer than predictions that tend to be wrong. Megatrends are disruptive forces that shape societies and economies to drive innovation, direct investment and foster novel ideas. Identifying these trends helps one to identify opportunities and avoid risks, for example: rapid urbanization, climate change, globalization, resource depletion and technological advances . My approach is to review the recent history of cities that resemble Cape Town to determine what should, and should not be done	Refer to megatrends affecting CT when working on strategy of the CBD	Minor improvements may be made to Vol 1 if required
476		So what lessons can be learned from this, somewhat arbitrary, selection of cities? The size of each is similar to what is expected of Cape Town in the coming decades, the main difference being that economic development here has been slowed, initially because of the effects of apartheid, more recently due to the mismanagement and neglect of new political and social experiments. The first lesson is that to consider the CBD in isolation from the remainder of the city is plain silly, as events there will be swamped by the rate and direction in which other areas develop.	Reference other similarly sized Cities and their CBD strategies.	Minor improvements may be made to Vol 1 if required
477		The second is that a top down, Keynesian, approach is bound to fail as if even Nigeria, with its abundant resources and high per-capita income, has failed to create a city that serves more than a tiny elite in Lagos. A better, Austrian, approach relies on bottom up creation of wealth by individual citizens if given opportunities to do so . The Creation v Extraction of Wealth document explains the thinking behind this assertion, and why the reliance of the CBD on extractive entities is doomed as creative alternatives emerge.	Consider inclusion of bottom up creation of wealth in strategies	Minor improvements may be made to Vol 1 if required
478		The risks posed by gangsterism, which destroyed Acapulco and is now destroying Rio de Janeiro, cannot be exaggerated. Even one of the most wealthy cities in the world, San Francisco, has major social and economic challenges that it is unable to solve. Yet a city like Buenos Aires, which has been buffeted by political and economic storms for decades, is rated as one of the most liveable in its region. And Barcelona, also riven by sectoral violence for centuries, is one of the best cities in Europe in which to live. So I suggest the following: let us abandon the delusion that job creation and economic growth will provide the answer; indeed, that path contains the seeds of the destruction of what makes Cape Town so special. The Job Delusion document attempts to explain why this is so and what to do about it	Abandon the delusion that job creation and economic growth will provide the answer; , that path contains the seeds of the destruction of what makes Cape Town so special. The Job Delusion document attempts to explain why this is so and what to do about it.	note
479		To return to the specifics of the CBD LSDF, I suggest that the City lead by example . By reducing its size and by deploying the remainder into the communities that it serves, the City will no longer need the Civic Centre, so it can be re-purposed. Being ideally positioned among commuter rail, MyCiti bus, and minibus taxi termini, it forms a natural focus for the central city district. I propose that the ground floor, car park and adjacent areas be transformed into markets, much as the central square of towns and villages were in times gone by, to enable citizens to trade goods. I suggest that the next one or two floors of the centre are given over to individuals and small enterprises that provide services to the ebb and flow of humanity that would result. The remaining floors should be converted into residential space of varying size and quality, in an inversion of a Victorian town house, where the upper floors would be for the toffs, and those below for them of less standing. They would enjoy the amenity of a public fitness centre converted from the council chamber, complete with punch bags modelled on politicians and other popular personalities. These concepts might be extended to include the Artscape complex for entertainment and cultural events, much as the town hall and church did in the past.	City should abandon the Civic Centre as concentration of office space and the building can be re-purposed.	A response is awaited

480	Justin Swart	Increasing the population of low-income residents in Cape Town's city center might crowd out higher-value economic activities, potentially disincentivizing investment from higher-income businesses or residents. Jane Jacobs, in *The Death and Life of Great American Cities*, argued that economic diversity and "eyes on the street" are crucial to urban vitality, but also stressed the importance of a balanced mix of residential, commercial, and cultural spaces. Research on agglomeration economies, particularly by Edward Glaeser, highlights how high-skill, high-income residents and businesses tend to cluster in city centers to benefit from proximity, information spillovers, and shared amenities. If low-income housing overwhelms Cape Town's downtown core, it could shift the composition of businesses toward lower-wage service sectors, limiting opportunities for the high-productivity firms that drive long-term economic growth (Glaeser, 2011). This could ultimately reduce Cape Town's competitiveness in a globalized economy. Empirical evidence from various studies suggests that large-scale densification of low-income populations in central urban areas can sometimes lead to an increase in crime and social dislocation, particularly if the city fails to provide adequate services or integrate these communities effectively. A study by Deirdre Desmond on social dislocation and urban poverty showed that when low-income populations are clustered without adequate support, crime rates tend to rise, straining municipal resources and leading to negative externalities for the broader population (Desmond, 2014). Additionally, concentrating poverty in the city center without pathways to economic mobility can lead to entrenched cycles of poverty. Cape Town should consider policies that integrate low-income residents more gradually, avoiding the concentration of socio-economic disadvantage in one geographic area. The introduction of significant low-income housing into the city center could distort the real estate market in unintended ways. The work of economists such as Richard Green and Stephen Malpezzi shows that rent control and low-income housing projects often have the unintended consequence of driving up rents elsewhere in the city (Green & Malpezzi, 2003). The spillover effects could exacerbate Cape Town's already critical housing affordability crisis in surrounding areas by shifting demand for middle-income housing outward, increasing property values and rents in adjacent suburbs. An	Increasing the population of low-income residents in Cape Town's city center might crowd out higher-value economic activities, potentially disincentivizing investment from higher-income businesses or residents.	This submission argues against policies for mass introduction of low income residential opportunities. Polycentric city is already an council approved concept in the MSDF and DSDFS
481	Josh Jordaan	I object to the use of contours in determining heights for buildings. Building heights should be determined on site-based characteristics and development feasibility. The City should not be artificially limiting the commercial and residential development potential of the CBD for sake of "views". In the City's own planning by-law there is no right to views. Furthermore, as global warming raises temperatures, shadows cast by buildings have street-level cooling effects; this is a key climate change adaptation measure.	Objects agains using contours for height. Volume 2, pg 74 and 75	Objection to the contour based approach to additional height, noting this is not driven by individual viewline imperatives, as the writer indicates, but by urban form imperatives. Comment noted. The cooling effect of shaded streets is mentioned
482		The CBD requires more pedestrianised zones, as well as frequent circulatory public transport (Trams).	CBD needs more pedestrinasation and Trams	the MAP Project makes proposals about pedestrinisatoin
483	Rosalind Ferguson	Please could we have a MyCiti route down Tennant street to DeVilliers Street. Or even down Tennant street to Constitution Street. We really need a MyCiti to come to this area. we need the MyCiti to run more routes inside the city. Especially for school children, <u>students and those needing to get to work.</u>	BRT should go down to Tennant and De Villiers	May consider changes in the Implemenation Plan, but will await direction from UM
484	Otto de Werd	hi there, I think it's great that time and effort is being put into the improvements and development of CBD. I do STRONGLY DISAGREE with the spatial plans specifically for high-rise in the lower gardens. As an owner of an apartment on dunkley square (Dunkley Place, 15 barnet street, sect nr 25, apt 18) with fantastic table mountain views, I was confirmed there are laws in place protecting this view until eternity. It will be detrimental to to look and feel, and value of my apartment. Please take my DISAGREEMENT into account. thank you.	I do STRONGLY DISAGREE with the spatial plans specifically for high-rise in the lower gardens.	Strong views will be considered against the larger study area and long term vision
485		Collaborative precinct management, More efficient regulation of development, Pedestrianisation and public realm improvements	objectives to contribute to the transformation of Cape Town CBD	Key pointers already considered in the vision and the implemenation plan

486	Jasmin Jakoet	2.2.2 states "The Gateway catalytic land development program presents the strongest opportunity for inner city affordable housing delivery at scale". However, the constraints in 2.3.1 are serious and therefore are in opposition with the above statement in 2.2.2. There is no basis to conclude that it is the strongest opportunity for affordable inner city housing when the fundamentals are not in place, such as the requirement for an inclusionary housing policy. There is no guarantee that this the best option as there is no solid basis and the studies mentioned are not in place. Rather, the city is being shortsighted by saying that these constraints will take time. Surely, we cannot achieve the targeted outcomes in a rushed manner where due consideration is not given and policies do not exist? The city's heritage and feel is at stake to line developers pockets without due consideration and these studies seem to be viewed as constraints to the City rather than serious requirements with decade long impacts.	Affordable housing in Gateway cannot be assumed to be the right location considering that studies are not in place. City should not be shortsighted and should consider heritage 2.2.2 and 2.3.1	Strong views will be considered against the larger study area and long term vision
487		Camps of homeless people who would not be able to afford access to the City's proposed 'inclusionary' developments any way.	Complaints about homeless people	noted
488		Have independent professionals / companies conduct the required studies to feed into proper policy documents. Do not rush developments for inclusionary housing without the relevant studies and policies in place - long term thinking about achieving real outcomes is required.	Inclusionary housing should not be rushed into if the necessary studies have not been completed considering the long term impact on the economy in the CBD.	Strong views will be considered against the larger study area and long term vision
489	Lea Chisolm	One of the greatest challenges of the CBD is the lack of affordable inner-city housing units. The CBD remains a symbol of spatial Apartheid, where the wealthy are allowed to stay and the poor can only come at certain hours to provide supportive services. It's shocking that "short-term rentals" were only mentioned twice, both times in the contextual analysis, despite the fact that over 70% of the existing housing stock is short-term. At this same point, it mentions a lack of policies to protect residents from unaffordable rents caused by the short-term rental market, with the potential for this to be exacerbated by further investment in the short-term rental market. Housing should have its OWN WHOLE CHAPTER IN THE SPATIAL DEVELOPMENT FRAMEWORK (chapter 5) part of the LSDF. It seems these challenges highlighted in the contextual analysis end at the contextual analysis. No policy proposals are made to combat the lack of long-term rental stock in the inner-city. It makes the document a joke. It's more interested in looking pretty for foreign investment and tourists than catering to the needs of the municipality's (really struggling) residents. This LSDF just reinforces that the city only works for a few. I suggest adding a chapter on housing. I think it should come before 5.1 Public Realm Structure. Who is the public that will be using these realms under this LSDF? A clear strategy for increasing the housing stock by 500% in the inner-city is desperately needed.	The CBD is only for the rich and the cheaper units are out of the market due to being used for AirBnB. Accommodation should have its own chapter in the document and not only referenced in the Vol 1. No policy statements made on combatting lack of long term rentals	Strong views will be considered against the larger study area and long term vision
490		Better coding or zoning of land uses is needed to understand the true use. Page 77 notes that 70% of residential stock in the CBD is used for short-term letting or hotel accommodation. However the land use modelling assumptions talk about "residential" demand, and "economic headwinds" used to predict a 300% growth in demand for residential stock, despite stock being unaffordable to 90% of the population (page 49). The true demand and headwinds are not residential, but touristic. This is important as any assumptions about the other services required, seasonal impacts for other businesses, and the long-term character of the CBD need to be properly understood. Furthermore, the City needs to consider the economic opportunity of properly zoning and rating these units as commercial, not residential, according to their true use. Finally, it is important for calculations on housing backlog to not include this stock in housing stock as it is not a part of the available supply in any real market sense.	The future land use growth trajectories is not clear. AirBnB should be rated at commercial rates. Housing stock calculations should exclude the AirBnB units.	May consider changes in the Implementation Plan.
491		Poor walkability and public realm investment, despite slow and incremental improvements e.g bulb-outs over the years.	Too little investment in the public realm	Document in agreement with is but trying to give Implementation Plan details
492		LSDF needs to be transferred to different asset owners for implementation. If the asset owner is roads, or parks, or community facilities they need to be handed over an implementation plan and budget to realise the plan, otherwise it is just theoretical. Private developers should be held to clear guidelines and offered incentives if they upgrade the surrounding public realm or include affordable stock.	Implementation Plan should have responsible departments more clear	Implementation Plan to have clear responsibilities and accepted by role players

493	Jodi Allemeier	Informal trading in the CBD requires a new approach. I suggest a tiered approach: 1. Formal markets: Green Market Square, St Georges, other plazas: should operate in a similar fashion to Oranjezicht market (not necessarily in product or vendor type, but in management model and governance - one operator, who is responsible for the area, marketing, charges fees to the vendors, etc). A market strategy for town can support this, to ensure there is e.g African curio market (Green Market), a fresh food market (St Georges Mall), and a local craft market (Grand Parade). (Other sites include Church Square, Harrington Square, Thibault Square - all can be put out to operator tenders for market operators) 2. Trading bay permit (as per trading plan and current permit agreements, but add additional "add on" fees for additional services, such as storage or formalised kiosks that would reduce the need for storage - the latter would also link to a pavement widening scheme). 3. Hawker permits - while currently mobile hawkers are not permitted, it is an economic reality that people facing sudden economic hardship often turn to selling goods like vetkoek, eggs, etc as an immediate source of economic stabilisation. These members of society should not be persecuted but should find care and a role in our CBD. Perhaps there is a method for allowing a specific number of licenses per day, allocated through a simple digital system, that would provide some security and dignity to these traders. This would also then provide the City with data about these hawkers which can be used to	Informal trading in the CBD requires a new approach.	May consider changes in the Implemenation Plan.
494		City should fund full spectrum of dignified housing and social development programs. While there is improvement in this area a lot more needs to be done. There also needs to be recognition that evictions from "camps" has a knock-on public realm impact, causing many to move into doorways, alley ways, pavements etc.	City should fund full spectrum of dignified housing and social development programs.	May consider changes in the Implemenation Plan.
495		I was generally pleased to read the LSDF and the positive approach to accommodating population growth in the CBD. I also appreciate the list of public land with development potential.	Appreciation for increase residential and public land development.	noted
496	Ivan Turok	Against this, I was very disappointed at the lack of discussion of inclusionary housing. The Contextual Analysis volume talked much more about inclusionary housing. The Transition Plan refers to affordable housing but only in very vague and general terms. There is very little discussion in the implementation plan of what exactly the City is going to do to improve the supply of affordable housing. This is a major weakness because the document acknowledges elsewhere how important this issue is. The residential property market remains highly exclusionary and unless the City puts measures in place to address this, nothing will change. Indeed, all the improvements planned to the safety, liveability etc will increase property prices and reinforce the exclusionary tendencies! The City needs to start putting obligations on private developers to contribute towards the provision of affordable housing. The LSDF can adress this challenge by ensuring that rezoning applications include some affordable housing.	Affordable housing policy and guidelines are not adequately covered. The City needs to start putting obligations on private developers to contribute towards the provision of affordable housing.	Quit pro quo diagram, City's expectation of additional requirements for increased heights, were in the previous version of the document. But Development Guidelines need to be expanded on and the Implemenation Plan needs to be updated.
497		Affordable housing opportunities , Business retention, facilitation of private investment and growing job opportunities, Collaborative precinct management, More efficient regulation of development, More social facilities , Pedestrianisation and public realm improvements, <u>Residential intensification</u>	Social facilities are under provided and will continue due to increasing residential.	May consider changes in the Implemenation Plan.
498	Ruaan Du Plessis	The draft needs to include Noise Control Policy. For an inclusive, healthy and family-friendly inner City and to attract additional developments for residential and tourist accommodation, we need to address the excessive noise created by Nightclubs and Bars. We have lived and owned property in the inner city for the past 3 years and the noise has only increased over this time. Policy needs to be created that Bars & Nightclubs need to have noise insulation and noise control measures in place. For example, the WC Liquor Act does not mention the word "noise" in its Act once. Local Government needs to step in here and include noise control measures as part of health, fire or occupation certificate requirements	Noise is a problem for family units	May consider changes in the Implemenation Plan.

499	Matt Macdonald	From the owners of ERF 9607, Hout Street, Cape Town. (Build-It City Hardware) The owners of ERF 9607 wishes to engage with the City to be deeply involved in the future of ERF 9606_RE. This site is currently leased to ERF 9607 and functions as parking and stock-piling for Build-It City. It belongs to City of Cape Town and forms part of an abandoned road widening scheme. The East boundary of ERF 9607 holds the primary façade of the building and is common to the West boundary of ERF 9607. In short, any change of ownership will cut off access to the building, and any development of ERF 9606_RE will obstruct the façade and cut off access to the building. It is for the above reason that the owners of ERF 9607 would like to be considered for the privilege of first refusal, should the land becomes available for purchase. The owners of ERF 9607 have been in consultation with with architects and town planners to explore development possibilities, prior to the Cape Town CBD Transition Plan Local Spatial Development Framework. The owners of ERF 9607 agrees with the principles and intents for Precinct 7 and is sensitive to the nearby Bo Kaap LSDF and would be willing to work with the City and its vision of the urban transition and the sensitive regulation of building form, whilst at the same time maximize the use space and contribute to the growing need for affordable housing, and housing as a whole.	ERF 9607 would like to engage the City's Propety Development department.	Appropriate response to be generated by diverting request to actual responsible department
500	Lerys Hendricks	The concept diagrams and framework drawings too small. They are very difficult to read. Even if they require more pages, allow the drawings to breathe so that the drawings can speak for themselves. Especially the Drafft LSDF. The annotations take up most of the sheet and cramp the LSDF.	The concept diagrams and framework drawings too small.	Upgrades ongoing in next version of document
501		Affordable housing opportunities	Affordable housing is inadequately progressed in the Implementation Plan and the policy document and the Guidelines Document	Consideration will be given to concern of too little affrodable housing