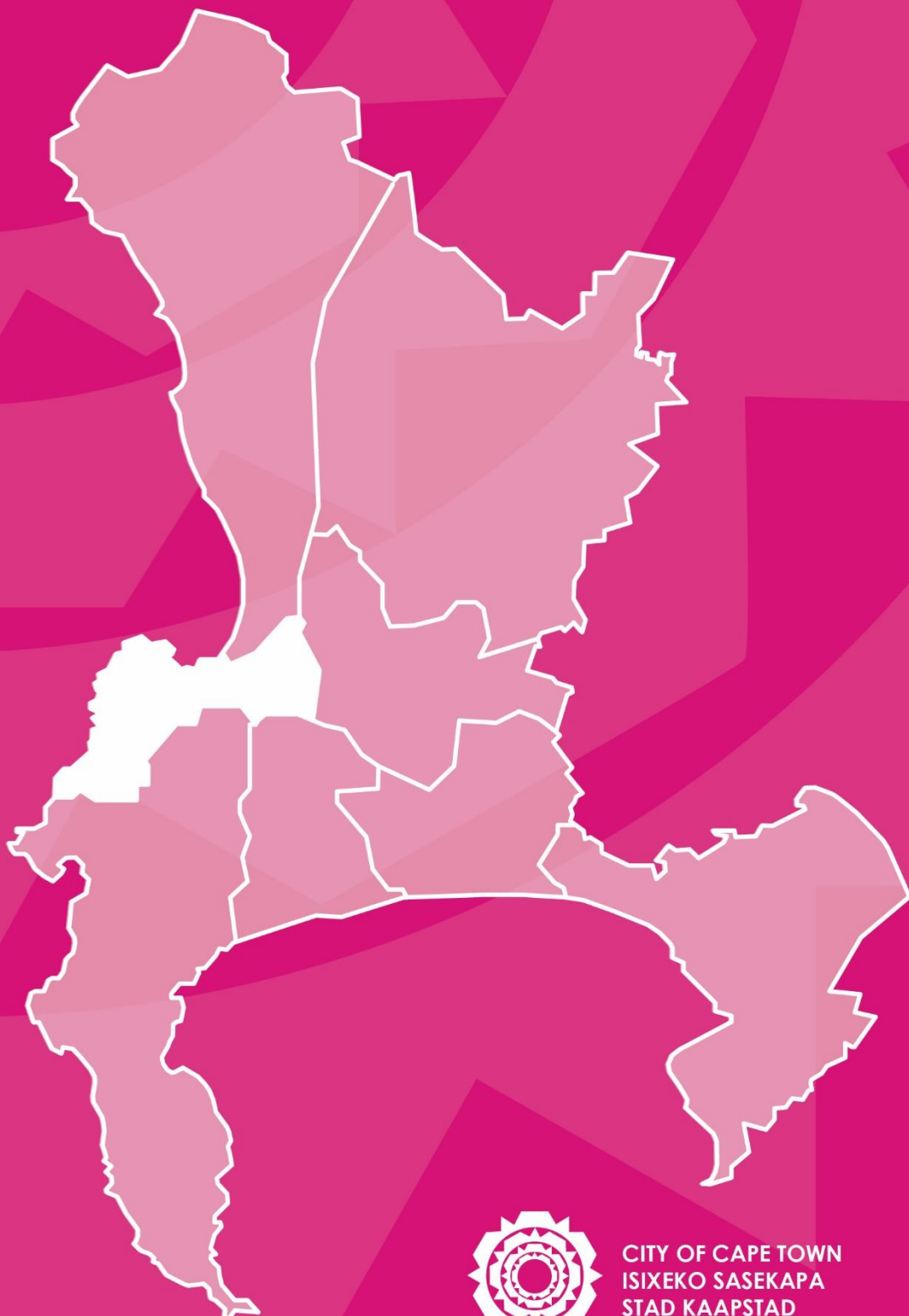


TABLE BAY

DISTRICT PLAN

Integrated district spatial development framework
and environmental management framework

APPROVED - Vol. 4: Annexures



**JANUARY
2023**



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

TABLE OF CONTENTS

Technical Annexure 1: Consolidated Terms, Acronyms and Definitions	5
Technical Annexure 2: Scope of the District SDF Review.....	23
Technical Annexure 3: Legal Policy and Context.....	40
Technical Annexure 4: Environmental Management	45
Technical Annexure 5: Ground Water Protection-Potentially Contaminating Activities	63
Technical Annexure 6: Methodology and Definitions for Human Settlements.....	67
Technical Annexure 7: Methodology for Transport Route Designations	78
Technical Annexure 8: Methodology Towards Designation Of Nodal Hierarchy And Typologies.....	85
Technical Annexure 9: Background and Methodology for Spatial Transformation Delineation	103
Technical Annexure 10: Defining Criteria for the Identification of the DFAs, USFAs and EFAs.....	113
Technical Annexure 11: Land Use Model 2040 Key Assumptions	131
Technical Annexure 12: Implementation Mechanisms Draft Baseline Report.....	137
Technical Annexure 13: Paarden Eiland Motivation for Retention of Industrial Zonings – Spatial Perspective	271
Technical Annexure 14: Public Comments and Responses	293

LIST OF FIGURES

Figure 1: IDP pillars and transformation priorities	41
Figure 2: 2012 versus 2017 long-term spatial vision	42
Figure 3: The Basic Accessibility Grid	78
Figure 4: The comprehensive City Accessibility	79
Figure 5: Cape Town's Accessibility Grid (as per CTMSDF, 2018)	80
Figure 6: Facilities nodal description and hierarchy	91
Figure 7: Spatial anatomy of the Blue Turtle	104
Figure 8: Spatial Transformation Areas (extract from CTMSDF, 2018)	107
Figure 9: Types of Property Development	138
Figure 10: Key Tasks	139
Figure 11: Application Process.....	156
Figure 12 Application Process.....	164
Figure 13: Application Process.....	171
Figure 14: Criteria for PT1 and PT2 areas.....	176
Figure 15: Additional criteria for PT1 and PT2 areas.....	176

Figure 16: PT Zones.....	178
Figure 17: Existing and Proposed UDZ Areas within the City of Cape Town.....	180
Figure 18 Depiction of a typical development application process.....	192
Figure 19 Three step consultative process for applications.....	192
Figure 20 Guidelines for assessing land use applications.....	195
Figure 21 Application Process.....	200
Figure 22 Overview of the relationship between the City, SRA and the member.....	206
Figure 23: Overview of the CLDP Methodology.....	210
Figure 24: Methodology.....	219
Figure 25: MURP Areas	219
Figure 26 Applying an Overlay Zone	224
Figure 27: Land Readjustment Scheme (Worldbank, 2015)	253
Figure 28: TAPs.....	255
Figure 29: Urban Redevelopment Scheme (Worldbank, 2015)	257
Figure 30: Land Identification Protocol Process Diagram.....	260
Figure 31: CoCT land pipeline for public investment	261
Figure 32: Location of study area.....	272
Figure 33: Paarden Eiland biodiversity network.....	273
Figure 34: Paarden Eiland flood Risk	274
Figure 35: Paarden Eiland Zoning Scheme	276
Figure 36: Paarden Eiland Land Use Audit	277
Figure 37: (Paul Court; Economic Analysis, Policy and Strategy Department)	282
Figure 38: (Paul Court; Economic Analysis, Policy and Strategy Department)	283
Figure 39: Economic activity of businesses in the Paarden Eiland Maritime Cluster (TDA; Paarden Eiland: Background Planning Document, 2018)	284
Figure 40: Paarden Eiland's Maritime Cluster	285
Figure 41: Shows areas identified for development (Paarden Eiland South Local Area Plan, 2015)	286
Figure 42: Land Use Applications	287
Figure 43: Freight staging.....	288

LIST OF TABLES

Table 1: Listed Activities triggered outside Urban Areas but not inside Urban Areas: i.e. the activities below are excluded inside NEMA Urban Areas.....	52
Table 2: Listed Activities that are different inside and outside Urban Areas.....	57
Table 3: List of Potentially Contaminating Activities	63
Table 4: Criteria to be used to guide the identification of land for subsidised and gap housing.....	75
Table 5: Criteria for categorisation of informal settlements upgrade/support.....	77
Table 6: Transport designations and symbology.....	83
Table 7: Alignment and hierarchy of the accessibility grid and areas of intensification	87
Table 8: Transit (Rail and IRT trunk) station precinct typology	88
Table 9: Community services and health precincts per area.....	89
Table 10: Community Services within nodal hierarchy	92
Table 11: Scale/ Hierarchy of Nodes	95

Table 12: Existing Typologies of Nodes/ Precinct Areas	96
Table 13: Typology and characteristics of Nodes.....	99
Table 14: Role and function, characteristics of nodes.....	101
Table 15: Scoring Matrix.....	147
Table 16: Available mechanisms and Policy Reference	151
Table 17 Proposed Mechanisms and Expected Timeframes	222
Table 18 Local Application Framework.....	267
Table 19: Cape Town's Top Exports	281

TECHNICAL ANNEXURE 1: CONSOLIDATED TERMS, ACRONYMS AND DEFINITIONS

The following list of acronyms and definitions is not specific to this document but applicable to the entire suite of SDF documents.

Acronyms and Terms

ACRONYMS	TERM
ACSA	Airport Company South Africa
AOLS	Airport obstacle limitation surfaces
BEPP	Built Environment Performance Plan
BNG	Breaking New Ground (housing developed in terms of the Integrated Residential Development Programme)
BPO	Business Process Outsourcing
BRT	Bus Rapid Transit
CBD	Central Business District
CDC	Community Day Centre
CDF	Conservation Development Framework
CDS	City Development Strategy
CEF	Capital expenditure framework
CFRPAWHS	Cape Floral Region Protected Areas World Heritage Site
CID	City Improvement District
CIF	Capital investment framework
CLDP	Catalytic Land Development Programme
CMA	Cape Metropolitan Area
CoCT	City of Cape Town
COVID-19	Corona virus disease 2019
CPUT	Cape Peninsula University of Technology
CRU	Community Residential Units
CSHIP	Community Services and Health Infrastructure Plan
CSIR	Council for Scientific and Industrial Research
CTIA	Cape Town International Airport
CTICC	Cape Town International Convention Centre
CTMSDF	Cape Town Municipal Spatial Development Framework
CTOD	Comprehensive Transport Orientated Development
dba	Noise level measured in decibel
DEADP	Department of Environment Affairs and Development Planning
DGA	Discouraged Growth Areas as per the MSDF
DMS	Development Management Scheme
DOT	Department of Transport (National)
Du/HA	Dwelling units per hectare (density measure)
DWS	Department of Water and Sanitation
ECAMP	Economic Areas Management Programme
ECD	Early Childhood Development
EIA	Environmental Impact Assessment
EIMZ	Environmental Impact Management Zone
EIP	Environmental Implementation Plan
EMF	Environmental Management Framework
EMP	Environmental Management Plan (in terms of Section 11 of NEMA)

FLISP	Finance Linked Individual Subsidy Programme
GABS	Golden Arrow Bus Service
GIS	Geographic Information System
HIA	Heritage Impact Assessment
HSS	Human Settlements Strategy
ICT	Information communication technology
ICMA	Integrate dCoastal Management Act
IDA	Incremental Development Areas
IDP	Integrated Development Plan (in terms of the MSA)
IDZ	Industrial development zone
IEM	Integrated Environmental Management
IGA/ IGCA	Incremental Growth and Consolidation Areas as per the MSDF
IHSF	Integrated Human Settlement Framework
IKNEP	Integrated Koeberg Nuclear Emergency Plan
IPDF	Infrastructure Planning and Delivery Framework
IPPs	Independent Power Producers
IPTN	Integrated Public Transport Network
IRDP	Integrated Residential Development Programme
IRT	Integrated Rapid transit
IT	Information Technology
ITP	Integrated Transport Plan
IUDF	Integrated Urban Development Framework
KNPS	Koeberg Nuclear Power Station
LAP	Land Assembly Programme
LFTEA	Less Formal Townships Act 113 of 1991
LGTA	Local Government Transition Act
LUM(2040)	Land Use Model (2040)
LUMS	Land use management system
LUPA	Land Use Planning Act(No. 3 of 2014)
LUPO	Land Use Planning Ordinance (1985)
MBT	Mini Bus Taxis
MPA	Marine Protected Areas
MPBL 2015	Municipal Planning By Law, 2015 (City of Cape Town)
MPT	Municipal Planning Tribunal
MSA	Municipal Systems Act (No 32 of 2000)
MSDF	Municipal Spatial Development Framework
MTIF	Medium Term Infrastructure Framework
MTREF	Medium Term Revenue and Expenditure Framework
MURP	Mayoral Urban Renewal Programme
NDP	National Development Plan
NEMA	National Environmental Management Act (No 107 of 1998)
NEMBA	National Environmental Management: Biodiversity Act, Act 10 of 2004
NGO	Non-Governmental Organisation
NHRA	National Heritage Resources Act (No 25 of 1999)
NLTA	National Land Transport Act (No 5 of 2009)
NNR	National Nuclear Regulator
NPA	National Ports Authority
NSDF	National Spatial Development Framework
PAZ	Precautionary Action Zone
PGDS	Provincial Growth and Development Strategy
PGWC / WCG	Provincial Government Western Cape

PHA	Philippi Horticultural Area
PHSHDA	Priority Human Settlements Housing Development Area
PIIF	Public Infrastructure Investment Framework
PNE	Protected Natural Environment
POA	Philippi Opportunity Area
POS	Public open space
PPM	Project portfolio management
PRASA	Passenger Rail Agency of South Africa
PSDF	Provincial Spatial Development Framework
PT	Public Transport
PTP	Public Transport Plan
RAG	Road Access Guideline
SAHRA	South African Heritage Resources Agency
SANDF	South African National Defence Force
SANParks	South Africa National Park
SANRAL	South African National Roads Agency Ltd
SANS	South African National Standard
SCBD	Secondary Central Business District
SDF	Spatial Development Framework
SDG	Sustainable Development Goals
SDS	Social Development Strategy
SEVI 2020	Socio Economic Vulnerability Index
SEZ	Special Economic Zone
SMF	Strategic Management Framework
SMME	Small, medium and micro enterprises
SOE	State Owned Entity
SPC	Spatial Planning Category
SPLUMA	Spatial Planning and Land Use management Act (Act No. 16 of 2013)
SRA	Special Rating Area
SSEG	Small-Scale Embedded Generation
STA	Spatial Transformation Areas
TAP(S)	Transit Accessible Precincts
TIA	Transport Impact Assessment
TMNP	Table Mountain National Park
TPC	Town-planning compliant
TRA	Temporary Relocation Area
TRUP	Two Rivers Urban Park
UCI	Urban Catalytic Investment
UCT	University of Cape Town
UDE	Urban Development Edge
UDP	Urban Development Policy
UIC	Urban Inner Core as per the MSDF
UISP	Upgrade of Informal Settlement Programme
ULO	Draft Unlawful Land Occupation Framework
UPDLI	Undeveloped and Partially Developed Land Inventory
US	University of Stellenbosch
UWC	University of the Western Cape
VPADD	Voluntary proactive deal driven
VPUU	Violence Prevention through Urban Upgrade
WiFi	Wireless Fidelity
WSUD	Water-sensitive urban design
WWTW	Waste water treatment works

Please see list of terms and definitions for acronyms not found on the list above

Terms and definitions

TERM	DEFINITION
Active interface	Refers to street frontages where there is an active visual engagement between those in the street and those on the ground floors of buildings. This quality is assisted where the front facade of buildings, including the main entrance, faces and opens towards the street, and also where ground floor uses accommodate activities that provide a level of interaction between pedestrians and the building uses including cafes/restaurants, shops, offices etc.
Adaptation	In the context of climate change, in human systems, the process of adjustment to actual or expected climate and its effects, in order to moderate harm or exploit beneficial opportunities; in natural systems it means the process of adjustment to actual climate and its effects; human intervention may facilitate adjustment to expected climate and its effects.
Affordable housing	Traditionally, affordable housing refers to housing with prices or values below the overall open market value, and which targets below-average incomes. This is a function of context and, in well-located areas of the City; unit prices are significantly higher than elsewhere, thus increasing the affordability threshold. The Provincial Inclusionary Housing Policy Framework points out that the affordability gap – the mismatch between what most households can afford versus the price most properties are available for - may differ across towns. Affordable housing should be primarily targeted at households earning between R3,500 a month and the upper threshold of the Financial Sector Code Affordable Housing Standards, currently R27 200 in 2023 (in 2018, these were households typically earning R22,000 or more). The 2021 Financial Sector Code Affordable Housing Standards define the affordable housing target market as households earning an upper income limit of R26,100 (rounded) (BASA, 2021). Any housing provision that complies with the definition of the Financial Services Sector, annually updated by using the midpoint between the Consumer Price Index and Building Cost Index, is considered as Affordable Housing in terms of the MSDf. With contributions from the State – in subsidies, land, or other development incentives – the National Department of Human Settlements' upper threshold of R22,000 can be applied and a deeper reach into the lower income bands of the affordable housing market can be achieved.
Alternative energy	energy sourced from a supply other than from a direct connection to a municipal or ESKOM electricity distribution network, including, but not limited to, (a) electricity from portable or rooftop or ground-mounted photovoltaic system, (b) liquid-petroleum gas (LPG), (c) solar water heaters.
Aquifer	Area identified as reflecting the physical extent of a water-bearing layer of soil, sand, gravel or rock that will yield significant usable quantities of water. A ground-level protection zone is required to prevent pollutants from leaching into the water supply
Aquifer Protection Zone (Or Groundwater Protection Zone)	City of Cape Town commissioned Umvoto to conduct a Groundwater Protection Zones and Vulnerability Mapping study in 2020 which identified aquifer resource protection zones based on extraction points where water is least likely to be contaminated and which provide time to clean up or address any potential contamination. These zones form part of much larger Strategic Water Source Areas (SWSAs), both surface and groundwater, delineated by the Water Research Commission in 2017. Surface SWSAs are areas of land that supply a disproportionate quantity of mean annual surface water runoff in relation to their size. Groundwater SWSAs are areas with high groundwater availability as well as where groundwater forms a nationally important resource. The Aquifer Resource Protection Zones are shown on MSDf map 5c to highlight where land uses must be controlled into the future rather than the SWSAs as there is no way to limit land uses and protect the entire SWSA extent.
Areas of Agricultural significance	Areas of high potential and unique agricultural land worthy of long-term protection given unique production, cultural and heritage attributes. This includes land that is currently cultivated, has been cultivated within the past 10 years, has the soil potential to be cultivated or be regarded as high-value grazing land, and contributes to food security, irrespective of extent. This can include non-arable land that supports the ecological support system.
Areas of Coincidence	Areas of coincidence are where there are compelling urban efficiency, social and economic reasons to pursue development and where core biodiversity may be impacted as a result.

Backyard dwelling	Backyard dwellings refer to informal structures on formal, residential erven, regardless of ownership. These structures are used for habitation and may be positioned behind, in front or next to the primary dwelling.
Biodiversity	Biological wealth of a specified geographic region including the different marine, aquatic and terrestrial ecosystems, communities of organisms within these, and their component species, number and genetic variation.
Biodiversity Network (BIONET)	The map of protected and critical biodiversity areas (including natural vegetation remnants and wetlands) for the city, based on the fine-scale systematic conservation plan, in accordance with the legal requirements. The network of the City's biodiversity areas (prioritised using a scientific and systematic fine-scale conservation planning method, in accordance with the legal requirements). Includes Protected Areas, open water courses, wetlands and indigenous vegetation.
Bioregion	A geographic region or area containing whole or nested ecosystems and that is characterised by its landforms, vegetation cover, human culture and history and declared by the Minister in terms of the National Environmental Management: Biodiversity Act, Act 10 of 2004 (NEMBA).
Bioregional plan	A legislated biodiversity plan, aimed at assisting with the management and conservation of South Africa's biological diversity, declared in terms of Chapter 3 of NEMBA. The aim of the plan is to provide a map of biodiversity priorities with accompanying land use decision making guidelines.
Biosphere Reserve	An area of regional biodiversity significance that's part of a global network organised by UNESCO. Core biodiversity areas are surrounded by buffer zones where local communities are permitted sustainable use of the natural resources.
Brownfield Intensification	Enhancing the productivity or profitability of a brownfield site (vacant and underutilised) areas generally located within the urban foot print/ built-up area. May include intensification and densification of the site. Intensification may include redevelopment that means the process of rehabilitating a particular piece of land for new uses after the former use has been discontinued.
Bulk Engineering Services	Means an engineering service provided to multiple users in the municipal area and includes the land required for the construction of bulk engineering services. Bulk services include mega distribution lines of bulk water or sewer and tapers down via link infrastructure to reticulation networks (which serve the individual erven).
Business Node	A business node is a concentration of economic activity which meets the two technical thresholds applied by the City's ECAMP Diagnostic Model: contiguous non-residential property with 1 000 work places and valued at no less than R50 million.
Carbon Neutral	Limiting the carbon emissions produced city wide to a point of neutrality from energy use, transport, and waste than can be absorbed or offset. The City of Cape Town has committed to being carbon neutral by 2050, meaning that it will not emit more carbon from energy use, transport, and waste than can be absorbed or offset.
Carbon sequestration	The process by which carbon sinks remove carbon dioxide (CO ₂) from the atmosphere.
Carbon sink	Anything that absorbs more carbon from the atmosphere than it releases, including plants, the ocean and soil.
Cemetery	A place for the burial of human remains, and may include ancillary buildings such as an office and chapel, but does not include a crematorium.
Character (of a place)	Collection of qualities and features that are distinctive to a place or area and in this case is used to distinguish period of establishment or pattern of settlement
Circular Economy	An industrial system that is restorative or regenerative by intention and design. It replaces the end-of-life concept with restoration, shifts towards the use of renewable energy, eliminates

	the use of toxic chemicals, which impair reuse and return to the biosphere, and aims for the elimination of waste through the superior design of materials, products, systems, and business models. (World Economic Forum definition)
City	means the City of Cape Town, a municipality established by the City of Cape Town Establishment Notice No. 479 of 22 September 2000, issued in terms of the Local Government: Municipal Structures Act, 1998, or any structure or employee of the City acting in terms of delegated authority;
Civic Clusters	Concentration of public facilities (e.g. schools, clinics, libraries) located in close proximity to one another. Various scales depending on the role and function within the locational context.
Civic Precinct	Concentration of public facilities (e.g. schools, clinics, hospitals, parks, city hall, courthouses, post offices, etc.) located in close proximity.
Climate change	Climate change refers to any change in climate over time, whether due to natural variability or as a result of human activity (IPCC 4th Assessment).
Climate Change Adaptation	The process of adjustment to actual, or expected, climate change and its effects. In human systems, adaptation seeks to moderate or avoid harm or exploit beneficial opportunities. In some natural systems, human intervention may facilitate adjustment to expected climate and its effects (IPCC Glossary, 5th Report).
Climate Change Mitigation	The process of adjustment to actual or expected climate and its effects. In human systems, adaptation seeks to moderate or avoid harm or exploit beneficial opportunities. In some natural systems, human intervention may facilitate adjustment to expected climate and its effects (IPCC Glossary, 5th Report). A human intervention to reduce emissions or enhance the sinks of greenhouse gases in the context of climate change.
Coastal Defence	Any natural or artificial structure that is designed or maintained with the view to providing protection for coastal infrastructure against coastal processes, such as coastal erosion, high seas, wind-blown sand etc.
Coastal Edge	Demarcated area around the coast, primarily to protect coastal resources, and to avoid hazards and financial risks pertaining to areas at risk from coastal processes. The coastal edge also represents the coastal management line as contemplated in section 25 of the Integrated Coastal Management Act, (Act No. 36 of 2014).
Coastal Node	Concentrated development at a specific coastal location.
Coastal Processes	Means environmental processes that affect or impact on the shoreline including erosion and accretion, storm surges, sea-level rise, dune and estuary mouth migration and the Aeolian movement of sand.
Coastal inundation areas on Climate Change Map	Coastal inundation areas reflect temporary areas of impact resulting from simultaneous occurrence of an extreme tide and extreme storm, an event with a nominal return period of 500 years. <i>Source: Fairhurst, L. 2008. Global climate change and adaptation: a sea-level rise risk assessment. Phase two: Final Report – Risk and Impact Identification.</i>
Commercial	General business activity and mixed-use development of a medium to high intensity. Whilst the focus of development of these areas is mostly office and retail development; a mix of uses including high and medium density residential development could be appropriate in these areas. Industrial development is generally not suitable in these areas.
Community Facilities	Public spaces and other required facilities where members of a community gather for recreational, educational, social, health and cultural activities. It includes parks and recreational areas, sports fields, community halls, libraries, clinics and public squares. It also includes functions rendered by provincial and national departments such as magistrates' courts, police stations, social services offices, home affairs and labour affairs offices.
Community Park	An intermediate size park, that serves the needs of the 1 or 2 local communities or suburbs. May include passive and active recreation areas, small scale kick-about areas, multi-purpose hard courts and playground equipment.
Connective infrastructure	Network infrastructure and services which enhance the accessibility and growth potential of nodes, including public transport, broadband and bulk infrastructure.

Connector route	These connect different areas of the city and have a greater mobility function than development corridor main roads. They are typically characterised by comparatively high volumes of faster-moving traffic, although this may vary considerably across a variety of different road types in different areas. These may accommodate a mixed activity/ mobility function, but their role in accommodating activity is generally confined only to nodal areas (or in more outlying areas 'villages'). In some instances, direct access to abutting land uses and residential properties is provided along connector routes.
Constrained land	Land in which development potential is constrained by locational and/or regulatory factors, including cemeteries, infrastructure, high potential agricultural land, flood plains, noise contours, parks, biodiversity areas, freeway and railway buffers, servitudes, bulk dams, nature reserves, water bodies and inaccessible pockets. It does not consider ownership or development rights which, in turn, relate to availability rather than Developability.
Context	The broader environment within which a development or site is located. Context is a broad term and can refer to natural systems, topography, the social and economic environment, the built environment, access, public institutions, public space, and public utility services.
Critical Biodiversity Area(CBA)	Critical Biodiversity Areas are terrestrial and aquatic features in the landscape that are critical for conserving biodiversity and maintaining ecosystem functioning, and that are required to meet biodiversity targets (for biodiversity patterns and ecological process features).
Critical Ecological Support Area (CESA)	Natural and rural areas with biodiversity importance which are essential for management consolidation, connectivity and viability of biodiversity in CBAs and protected areas. These are not essential for meeting biodiversity targets but play an important role in supporting the ecological functioning of CBAs and/or in delivering ecosystem services.
Critical Natural Asset (CNA).	Protected and Conservation Areas, irreplaceable Core 1 Critical Biodiversity Areas found outside of designated New Development Areas, Philippi Horticultural Area, land seaward of the Coastal Edge, and mountainous areas performing an agriculturally-significant, Biodiversity or catchment function.
Cultural landscape	Sites, areas, places, settlements and urban and rural landscapes of historical significance, vistas and scenic beauty and places of spiritual, cultural and historic significance.
Decarbonisation	Meaning the process by which countries, individuals or other entities aim to achieve zero fossil carbon existence. Typically refers to a reduction of the carbon emissions associated with electricity, industry and transport.
Densification	Increased use of space, both horizontally and vertically, within existing residential areas/properties and new developments, accompanied by an increased number of units and/or population threshold.
Destination place	A place that forms a significant landmark or area of attraction and is part of the unique identity of Cape Town. Due to these qualities, these places hold potential for exploiting economic opportunities particularly in relation to their role as destinations for locals and tourists.
Development Charges (DCs)	A development charge is a once-off capital charge paid by developers to the City of Cape Town to cover the cost of municipal services. The City has a Development Charges Policy. The desired outcome of Development Charges Policy is to: a) recover the portion of the capital cost of economic infrastructure that is attributable to particular developments; b) enable the provision of economic infrastructure in a timely and sufficient manner to support land development; and c) provide economic infrastructure in the most cost effective manner taking into consideration scarce resources and effective urban form.
Developable Land	Developable land is land falling inside the urban edge of 2016 which was neither developed nor constrained.
Development Corridor	Typified by intensified and diversified land use, these corridors reflect the targeted, prioritised areas earmarked for the largest spectrum of land use mix associated with the highest density of population and employment. They are inclusive of Integration Zones and link diverse economic nodes - ranging from mature and developing to emerging, and across a hierarchy of function and services levels (metropolitan and sub-metropolitan).

Development Focus Areas (DFA)	Areas targeted for urban restructuring and planning focus in the short - medium term that have the highest potential spatial transformative impact with dedicated budget, planning or investment to facilitate development. See Priority Local Facilitation Areas (PLFA).
Development Management Scheme (DMS)	A scheme consisting of scheme regulations and a register with (or without) a zoning map.
Development Route	Characterised by strip and/or nodal urban development along most sections of the route. This comprises (should/can comprise) medium to high intensity mixed use development in identified urban nodes, with primarily (or almost exclusively) medium to high residential development between these node areas. These roads are characterised by direct access and interrupted movement flows, especially at bus and taxi stops and traffic lights.
Diversification of land use	Refers to a mixture of land uses in an area. Refer to Technical Supplement B.
District Node	An area characterised by the intensity (density), mix (diversity) and clustering of urban activities and land use found within them. Nodes often contain central access points to municipal or other services (sub-council offices, and other services points) and centrally located community facilities (courts, hospitals/ clinics, libraries, community halls, sports arenas).
District Plan	Document which includes the integrated District Spatial Development Framework and the Environmental Management Framework
District / Regional Park	A large park with a variety of recreational facilities. Serves the needs of several surrounding communities/ or suburbs in a regional context. People may travel some distance to access. Generally multi-functional. Can include active and passive recreational facilities, informal sports facilities such as kick-about areas, multipurpose hard surfaces and playground equipment. Can include a special interest component such as a river, waterbody and wetland or biodiversity area.
District spatial development framework (DSDF)	As contemplated in Chapter 3, Part 3 of the City of Cape Town Municipal Planning By- Law, 2015, as amended. Document which includes integrated District Spatial Development Framework (DSDF) and Environmental Management Framework (EMF)
Ecological services	Services that indirectly accrue from the natural environment, and do not have direct market values. Can include flood attenuation, natural drainage and erosion prevention, wastewater management through biological treatment, air quality management and filtration, carbon sequestration, and biodegradable waste disposal.
Ecological buffer	Strip of land adjacent to a watercourse, wetland or vlei, required for the protection and enhancement of aquatic and riparian ecosystem integrity and functioning.
Economic agglomeration	A concentration of businesses and people increases productivity both by putting upward pressure on the price of land, thus driving businesses to become more productive and people to become more skilled, and also through the agglomeration benefits to which close proximity of firms gives rise. Valuable agglomeration economies, which help to sustain Cape Town's prominent regional position, are crucially dependent on effective infrastructure.
Economic potential areas	Areas anchored by 'opportunity' or 'growth' business nodes which exhibit an above-average location potential, and typically characterised by economic agglomeration.
Ecosystem	Means a dynamic complex of animal, plant and micro-organism communities and their non-living environment interacting as a functional unit.
Ecosystem services	Ecosystem services are the many and varied benefits to people derived from the natural environment and from healthy ecosystems. They include provisioning (e.g. water supply), regulating (e.g. flood control), supporting (e.g. habitat provision) and cultural (e.g. recreation) services. Refers to the benefits people derive from ecosystems. They include provisioning, regulating, supporting, and cultural services.

	1. Provisioning services are the benefits to people that can be extracted from nature, e.g. food and water. 2. Regulating services are the benefits provided by ecosystem processes that moderate natural phenomena, e.g. water purification, erosion and flood control, and climate regulation. 3. Supporting services are those services that support processes to enable basic sustenance of life, e.g. the provision of habitat, water cycling, nutrient cycling, photosynthesis, and soil formation. 4. Cultural services are the non-material benefits from nature that contribute to the development and cultural enhancement of people, knowledge building, creativity and recreation.
Employed	Persons who work for pay; profit or family gain in the reference period.
Environmental Focus Areas (EFAs)	Spatially targeted areas with critical environmental significance (in terms of national conservation targets) outside of formally protected areas which have been identified as priority areas for investment and/or protection in the short to medium term. See Priority Local Facilitation Areas (PLFA).
External Engineering service	Means municipal engineering services situated outside the boundaries of a land parcel/area required to serve the use and development of the land parcel and is either a bulk engineering service or link engineering service.
Fire Risk Lines	Two sources were combined to delineate Fire Risk Lines: the 'Wildland-Urban Interface' (WUI) - as per the GEF Fynbos Fire Project and defined as the risk level to communities where urban development areas intermingle with flammable wildlands. It represents itself in different risk levels to residents and their assets in terms of exposure to death or injury and damage from wildland fires. The line represents the life risk to residents and was methodologically delineated in a similar fashion from Gordon's Bay to Melkbosstrand on the outer edges of the built-up area. The line should be considered as indicative of locations where vegetation fires are difficult and operationally complex and expensive to fight considering the locational context of the natural environment and operational constraints of practical firefighting. The WUI was supplemented on the Peninsula by the fire breaks of the Table Mountain National Park whilst no line exists for the Cape Flats coastal area.
Floodline	A line on a map depicting water levels likely to be reached by a flood having a specified recurrence interval.
Floor factor (FF)	The factor (expressed as a proportion of 1) which is prescribed for the calculation of maximum floor space of a building or buildings permissible on a land unit. If the floor factor is known, the maximum permissible floor space can be calculated by multiplying the floor factor by the area of the land unit.
Food security	Food security is a situation that exists when all people, at all times, have physical, social and economic access to sufficient, safe and nutritious food that meets their dietary needs and food preferences for an active and healthy life. (HLPE, 2020: 10)[1].
Food Security Assets	Any space, resource or process, which contributes to achieving food security.
Food Security Threat	Food Security Threat Any space, resource or process, which threatens the achievement of food security.
Food Sensitive Planning	Food sensitive planning emerged from water sensitive design and involves an active strategy whereby food security and food system impacts are considered in all planning processes. Food sensitive planning includes specific food and planning related activities.(e.g. zoning for agricultural activities, inclusion of supportive infrastructure for food preparation and storage in trading spaces). It also includes a consideration of food in other planning activities. (e.g. precinct planning, solid waste management). Food sensitive planning spans physical planning, spatial planning, urban design and governance planning.
Form	The layout (structure and urban grain), density, scale (height and massing), appearance (materials and details) and landscape of development.

Functional Area (for the purpose of the CIP)	The Functional Area for the purpose of the Comprehensive Integrated Transport Plan (CITP) is the area of the City, together with the areas of those other municipalities with whom the City has a transport planning relationship. This area has been agreed in the Western Cape Growth and Development Strategy and the Western Cape Land Transport Framework, and is defined in the CITP.
Functional Area (for the purpose of the GCMRSIF)	Functional area to be defined in terms of the Greater Cape Metropolitan Regional Spatial Implementation Framework
Gap housing	Housing for households with a monthly income of between R3 500 and R10 000, who fall outside the government housing subsidy income limit of R3 500 per month, and find it difficult to access housing in the private market.
Gateways	A place or settlement through which tourists typically first visit on their way to a <u>tourist attraction</u> or <u>tourism region</u> . Tourist gateways may not offer significant attractions themselves. Although the term suggests that they must be passed through en route, a gateway may not be the only way to reach the tourist destination
Green Economy	Expanded economic opportunities created through the provision of goods and services, and the use of production processes, that are more resources efficient, enhance environmental resilience, optimise the use of natural assets, and promote social inclusivity.
Green Infrastructure Corridors	Green corridors connect fragments of green space with the aims of enabling species dispersal and limiting animal and plant population isolation; assisting with climate change adaptation; flood prevention; urban ventilation and supporting healthier public environments. Corridors connect fragments of natural and green space within the urban environment and provide a range of services that provide benefits and opportunities for people and nature. These include enabling species dispersal, limiting biodiversity isolation due to habitat fragmentation, assisting with climate change adaptation, improving livability, and providing for social and recreational connection and mobility.
Green infrastructure (GI)	Natural and semi-natural open spaces, natural ecological and 'engineered' ecological systems, with other environmental features, that integrate with the built environment, to provide a wide range of ecological, community and infrastructure services. GI provides ecosystem services and can be present on a continuum from large scale naturally functioning systems to small scale urban elements (e.g. trees or a bioswale within a development). GI can help assist with the amelioration of urban development impacts. GI assets ideally form an interconnected network within the urban environment.
Green Infrastructure Programme (GIP)	A City programme whose purpose is the protection and enhancement of existing natural assets and the promotion of new green infrastructure (GI) assets, in order to underpin Cape Town's sustainability, enhance the city's living environment and improve its resilience to the effects of climate change
Green Infrastructure Network (GINet)	Spatial representation of natural and green open spaces (>1ha) in the city, the benefits they provide and the opportunities they present, in terms of selected predefined ecosystem services. They form a network through the connection via existing and potential ecological and green corridors/ greenways. The intention of the GINet is to guide development
Gross Base Density	The average number of dwelling units per hectare across large city district areas or the city as a whole, excluding land-extensive uses such as agricultural and rural land and large natural areas/nature reserves/parks.
Gross Lettable Area (GLA)	The area of a building as per the MPBL, 2015 designed for, or capable of, occupancy and/or control by tenants, measured from the centre line of joint partitions to the inside finished surface of the outside walls, and shall exclude the following: (a) all exclusions from the definition of floor space; (b) toilets;

	(c) lift shafts, service ducts, vertical penetrations of floors; (d) lift motor rooms and rooms for other mechanical equipment required for the proper functioning of the building; (e) areas reasonably used in connection with the cleaning, maintenance and care of the building, excluding dwelling units for caretakers, supervisors, cleaners or maintenance staff; and (f) Interior parking and loading bays.
Growth Node	A business node which exhibits above-average market performance and above-average location potential as measured by the City's ECAMP Diagnostic Model.
Heritage Conservation Area	Area identified for protection based on its cultural, historical and environmental value and which may, or may not yet, have been formally protected under the NHRA (S31) or under the Heritage Protection Overlay zoning (MPBL).
Heritage Exemption Area	A defined geographical areas where the requirements for heritage permissions have been exempted in terms S34 or S38 of the NHRA and have been published in the government gazette.
Heritage Protection Overlay Zone (HPOZ)	The area identified for the protection of its heritage qualities managed under the Heritage Protection Overlay Zoning of the DMS MPBL. It has been formally protected by means of a gazette notice.
Heritage Inventory	Compiled by the local authority (in this case The City) and contains all heritage resources within its area of jurisdiction.
Heritage Register	A register maintained by the provincial heritage resources authority (in this case HWC) that lists all heritage resources considered to be conservation worthy.
Heritage Resource	Any place or object of cultural significance, according to the NHRA, unique, non-renewable and precious locations includes sites and landscapes of historical significance, areas of scenic beauty, and places of spiritual or cultural importance.
Historic Urban Landscape	An urban landscape that has been formed over time and that is characterized by historical layering of architectural features and cultural values.
Household	A household is a group of persons who live together and provide themselves jointly with food or other essentials for living, or a single person who lives alone. Note that a household is not necessarily the same as a family.
Inclusionary Housing	Policy directive or approach that seeks to leverage the development application process for new residential or commercial developments to secure the construction and perpetual availability of affordable housing in an integrated manner. (See also Affordable Housing)
Incremental densification	Small-scale densification that has a minimal impact on the urban fabric, e.g. subdivision or secondary dwelling units, but translates into higher densities over time.
Institutional open space	These are green open spaces within existing institutional areas, that may not be zoned public open space but provide open space services, these include sportsfields and other open space at schools, sports clubs, hospital sites or university campuses etc.
Internal Engineering Services	All engineering services network points related to the internal distribution network inside a land parcel. Link services connect this internal network to the bulk network.
Inward Growth	Urban development that occurs within the existing urban footprint and infill development of developable land within the current urban periphery.
IRT Feeder Route	A secondary and usually smaller carrying route of an Integrated Rapid Transit system, which feeds the main trunk route.
IRT Trunk Route	A primary carrying route of an Integrated Rapid Transit system with a higher than average large travel demand

Labour absorption rate	Employed persons as a percentage of the working age population.
Labour force	Employed persons plus unemployed persons.
Labour force participation rate	Labour force as a percentage of the working age population.
Land consumption	The rate of conversion from developable to developed land, premised on definition of each.
Land Development	'Land development' means the erection of a building or structure on land or the change in use of land, including township establishment, the rezoning, the subdivision or consolidation of land or any deviation from the land use or use permitted in terms of the development management scheme, and 'development of 'land' and 'develop land' have corresponding meanings.
Land redistribution	Means land redistributed to the landless poor, labour tenants, farm workers, and emerging farmers for residential and productive uses to increase livelihoods and improve quality of life.
Land reform	Encompasses three interrelated components, namely land restitution, land tenure and land redistribution.
Land Unit	Refers to any portion of the Parent Property, or a Section as defined in the Sectional Titles Act, 1986 (Act No. 95 of 1986), situated on the Parent Property, registered or capable of being registered in the Cape Town deeds registry, and includes but is not limited to an "erf" (howsoever zoned) or "sectional title unit"
Land use Intensification	Refers to achieving a greater degree of uses (commercial, industrial and residential) through the increased use of space, both horizontally and vertically, within existing areas or properties and new developments, accompanied by an increased number of units and/or population thresholds, in accessible, high opportunity locations.
Location potential	Composite metric generated annually by the City's ECAMP Diagnostic Model to gauge the level of alignment between a business node's locational assets and constraints, and the generic requirements of the main non-residential property classes -- industrial, office and retail. It consists of agglomeration (scale, intensity and complexity of economic activity), room for growth, proximity to suppliers, markets and gateways, level of infrastructure constraint and congestion, incidence of business burglaries and robberies and access to workers and disposable income.
Marginalised Areas	Areas characterised by predominantly low-income communities including significant informal settlements and/or other neighbourhoods classified as needy or very needy by the City's Socio-Economic Index.
Market Failure	In economics, market failure is a situation in which the allocation of goods and services is not efficient. Externalities result from market failure. A market (e.g. land market) is said to have significant externalities when the true gains and losses associated with the consumption of a product (e.g. land) differs from the private cost. Externalised costs result in inefficient market outcomes. Most mainstream economists believe that there are circumstances in which it is possible for government to improve inefficient market outcomes. Poorly implemented attempts to correct market failure may lead to an inefficient allocation of resources, called government failure.
Market performance	Composite metric generated annually by the City's ECAMP Diagnostic Model to gauge the business node's level of economic performance, using a range of property market indicators including rentals, vacancy, building development and property churn.
Metropolitan Node	An area characterised by the intensity (density), mix (diversity) and clustering of urban activities and land use found within them. Nodes often contain central access points to municipal or other services (sub-council offices, and other services points) and centrally located community facilities (courts, hospitals/ clinics, libraries, community halls, sports arenas).

Mitigation (Climate Change)	Means, in the context of climate change, a human intervention to reduce emissions or enhance the sinks of greenhouse gases.
Marine Protected Area/ No Take Zones	An area of coastline or ocean that is specially protected for the benefit of people and nature; No-Take Zones are where no fishing or extractive activities are allowed.
Mixed land use	Area of existing or proposed horizontal or vertical integration of suitable and compatible residential and non-residential land uses within the same area or on the same parcel of land; implies contextually appropriate intensity of land uses amongst others. Also referred to as land use diversity.
Mobility	The ease with which people can travel with minimal delay on a route.
Multifunctional	The combination of different yet compatible functions within one physical framework to serve a variety of social and community groups; allow for a wider range of facilities that reinforce one another in close proximity, offering greater access to potential users. Differentiation in activity may be physical (different activities on different floors or premises of the same building) or in time (using the same facility for different activities, but at different times).
Municipal financial sustainability	The financial ability to deliver services, develop and maintain the infrastructure required by its residents without unplanned increases in rates and taxes or a reduction in the level of services and the capacity to absorb financial shocks caused by natural, economic and other adversities without external financial assistance.
Neighbourhood Park	A small-scale park serving the needs of the immediate local neighbourhood. May include passive and active recreation areas, small-scale kick-about areas and playground equipment and may be no more than a couple of items of play equipment.
Net Zero Carbon Building	A building that is highly energy-efficient and the remaining energy demand is met by renewable energy, on-site or off-site, so that there are zero net carbon emissions associated with the operational energy of a building on an ongoing annual basis.
New Development Area (NDA).	An area earmarked for future development. undeveloped and partially developed land parcels that are suited for future residential or non-residential urban development, which were identified through a technical investigative process for the City's 2040 Land Use Model in order to determine the required supply and quantum of residential and non-residential development to accommodate the projected future growth of population in Cape Town.
Nodal Development	Significant and concentrated development in terms of scale, location, impact, diversity and agglomeration of functions (facilities, services and economic activities).
Non-motorised transport (NMT)	Transport modes that are not motorised, e.g. walking and cycling.
Not economically active	Persons who were neither employed or unemployed (e.g. full-time students; retired persons; and homemakers who did not want to work).
Noxious industry	A trade, use or activity that is offensive, poisonous or potentially harmful because of fumes, emissions, smell, vibration, noise, waste products, nature of material used, processes employed, or other cause and is considered to be a potential source of danger, nuisance or offence to the general public or persons in the surrounding area
Opportunity Node	A business node, which exhibits above-average location potential but below-average market performance as measured by the City's ECAMP Diagnostic Model.
Other Ecological Support Area (OESA)	Transformed (e.g. extensive agriculture) sites with conservation importance.

Overlay zone	As per MPBL, 2015, Item 159 to 191, a category of zoning applicable to a particular area or land unit which: (i) stipulates development rules in addition to the underlying zone or base zone requirements, which may be more or less restrictive; (ii) may include provisions and development rules relating to primary -, additional -or consent uses, limitations in addition to the underlying base zone, subdivision and sub divisional areas, special planning areas, development incentives, urban form, urban renewal, heritage and environmental protection, etc.
Package-of-plans	As per the MPBL, 2015, The hierarchy of plans specified in terms of the provisions in item 136 of the Development Management Scheme, and applies to areas generally referred to as special planning areas.
Period	Refers to a period of time (date) when a place or area was established or developed
Population density	The number of people per given area, e.g. square kilometre.
Population growth	This is a change in the size of the population (increase or decrease) of a particular place at defined time as a function of births, deaths and net migration.
Potable water	Water intended to be used for drinking or domestic purposes, such as preparing food, and washing.
Precautionary Areas	Means areas that should be discouraged from urban developments, as indicated in Table 8.
Priority Local Facilitation Area (PLFA)	Spatially targeted areas identified in the DSDFs that provide the district / local level basis for spatial prioritisation and aim to guide implementation through directing public investment, incentives, budgets and planning focus for the short to medium term. These include the Development Focus Areas (DFAs), Urban Support Focus Areas (USFAs) as well as Environmental Focus Areas (EFAs).
Proposed Heritage Overlay Zone (PHOZ)	Specific landscape qualities or clusters of heritage resources motivate for protect places of environmental or cultural interest. The inclusion of these in spatial plans is compliant with the NHRA definition of Heritage areas where in Section 31. (1) A planning authority must at the time of revision of a town or regional planning scheme, or the compilation or revision of a spatial plan, or at the initiative of the provincial heritage resources authority where in the opinion of the provincial heritage resources authority the need exists, investigate the need for the designation of heritage areas to protect any place of environmental or cultural interest.
Public space open	Land which is designated as public open space, under the ownership of the City or other organ of state, with or without access control, and which is set aside for the public as an open space for recreation or outdoor sport, including a park, playground, public or urban square, picnic area, public garden, nature area including ancillary buildings, infrastructure and uses.
Public transport interchange (PTI)	Supports the transfer of public transport users between modes (rail/bus/taxi) but also functions to support economic activity.
Resilience	The capacity of social, economic and environmental systems to cope with a hazardous event or trend or disturbance, responding or reorganising in ways that maintain their essential function, identity and structure while also maintaining the capacity for adaptation, learning and transformation.
Resource efficiency	The rate at which finite and scarce resources are consumed relative to economic and population growth.
Resorts	A place that is frequented for holidays or recreation or for a particular purpose.
Risk activity	An undertaking where the material handled or the process carried out is liable to cause combustion with extreme rapidity, give rise to poisonous fumes, or cause explosions, and includes major hazardous installations and activities involving dangerous and hazardous substances that are controlled in terms of national legislation.

Roofscape	The distinguishing character of a particular street or area as viewed along the skyline or horizon and is formed by roof shape and repetitive patterning.
Rural living estates	Extensive land units (ranging in size) located inside the urban edge.
Rivers & streams	Refers to watercourses of all sizes that flow in a natural channel regularly or intermittently as well as its bed and banks.
Scenic Routes	Scenic routes are public roads that traverse areas of outstanding scenic quality or that provide a view of scenic areas. Scenic routes facilitate appreciation of Cape Town's natural, built and cultural heritage, and in themselves have become attractions. Two types of scenic routes exist – SR1 routes, which are limited access routes that traverse areas of high scenic quality and SR2 routes which traverse areas of high scenic quality and are frequently accessed.
Scenic Drive	Scenic Drives frequently link major tourist destinations such as Table Mountain, Cape Point, Kirstenbosch, the Winelands, and the beaches around the Peninsula, and enhance experience of these destinations.
Sea-level rise	An increase in the mean level of the ocean. Eustatic sea-level rise is a change in global average sea level brought about by an increase in the volume of the world's oceans. Relative sea-level rise occurs where there is a local increase in the level of the ocean relative to the land, which might be due to ocean rise or land level subsidence. In areas subject to rapid land-level uplift, relative sea level can fall (IPCC 4th assessment).
Setting	The surroundings in which a heritage resource is situated and which influences the experience of the resource. It can include e.g. backdrop (natural or man-made) or the immediate landscape in which it is situated.
Significant negative impact	In relation to development, when a proposal has the potential to: negatively impact on the structure of a neighbourhood or part of the city; detrimentally alter the character of a neighbourhood; cause undue inconvenience for public access; limit adjacent property owners ability to enjoy or realise the rights they are entitled to; or undermine the market value of an adjacent properties of a neighbourhood as a whole.
Smallholding	Refers to a property, whether improved or not by the construction of a dwelling, not large enough to support a commercially viable farming operation, but able to provide a subsistence level of output for the owner thereof.
Spatial concept	A concept used to describe a particular set of spatial features (e.g. urban node, civic precinct).
Spatial efficiency	The private and public benefit of urban development and attendant infrastructure, relative to its lifecycle cost.
Spatial Targeting	Is the deliberate act of focusing government and private sector interventions, services, infrastructure development or policy responses into a specific geographical area. This area-based approach generally seeks to maximise the impact of an urban or regional policy initiative, and can be applied at a range of scales
Spatial transformation	The process of reversing the negative impacts of apartheid spatial planning (spatial fragmentation, inefficient urban form, racial segregation and ghettos of poverty etc.). Integrating communities and increasing opportunities to a greater number of people in highly connected areas are among the key outcomes of spatial transformation. Renouncing the creation of new low-income communities on the periphery of the city is also a key principle to avoid the need for these groups to spend a disproportionate amount of household income on transport and remain distant and dislocated from the socio-economic benefits and amenities associated with central urban locations.
Special/ Destination Place	A landmark or a location that forms a significant point or area of attraction which contributes to the unique identity of Cape Town
Storm surge	An abnormal rise of water generated by a storm, over and above the predicted astronomical tides (http://www.nhc.noaa.gov/surge/).

Streetscape	The distinguishing character of a particular street as created by the elements at ground floor, including building frontages, setbacks, materials, form, road space, landscaping, street furniture, etc.
Strip development	Mixed-use development usually located along activity routes and activity streets and some developmental routes.
Structuring element	Spatial aspect that provides structure or form to urban development (e.g. a main road provides structure to which land uses respond).
Structuring open space	Open space which is not part of the biodiversity network or significant agricultural areas, but has been identified to promote access to open space for active and passive recreation. Whilst the focus is on areas that are usable and accessible for most of the year, the identification has included cemeteries, detention ponds, servitudes, river corridors and road reserves in order to promote the notion of a linked open space system.
Sub place	Second (lowest) level of the place name category, determined by Statistics South Africa, namely a suburb, section or zone of an (apartheid) township, smallholdings, village, ward or informal settlement.
Subsidised housing	Housing supplied in terms of the National Department of Housing's housing subsidy scheme.
Tenure blind design	A design practice that purposely masks the differences in income and tenure through the use of similar design and architecture throughout the development. This facilitates the development of integrated communities.
Tourism Development Areas	Refers to Tourism Areas which were Identified in the 2004 Tourism Development Framework and it indicated where tourism activities took place (Nodal Hierarchy).
Townscape	The distinguishing character of an urban area or urban landscape, usually relating to a neighbourhood or defined geographical area.
Transit Corridors	Transportation corridors include one or more routes that connect centers of economic activity. The routes have different alignments but common transfer points and common ends, which are gateways that allow traffic to enter or exit the corridor.
Transit Oriented Development (TOD)	Transit-oriented development (TOD) is a multifaceted and targeted strategic land development approach to improved urban efficiencies and sustainability by integrating and aligning land development and public transport services provision. It promotes inward growth and compact city form with an emphasis on building optimum relationships between urban form, development type, development intensity, development mix and public transport services to create a virtuous cycle of benefits over the long term as described in the City of Cape Town TOD Strategic Framework. Different TOD objectives, tools and outcomes are applicable at metropolitan, corridor, nodal, precinct and project scales.
Unemployed	Persons who do not work, but who looked for work and were available to work in the reference period.
Unemployment Rate	Unemployed persons as a percentage of the labour force.
Urban Development	Buildings and infrastructure with a residential purpose as well as offices, shops, community facilities and other associated buildings, infrastructure and public open space necessary to provide for the proper functioning of urban areas and amenity and recreation. The term 'urban development' includes golf estates, vineyard estates with a residential component, equestrian estates with a residential component, rural living estates, eco-estates, gated communities and regional shopping centres. Urban development excludes noxious industry and generally excludes land for industrial purposes. However, service trades that are compatible with mixed-use development and that generate a low impact on surrounding urban uses may be permissible if the nature and type of industry is deemed to form an integral part of an area demarcated for urban development purposes.

Urban Development Edge (UDE)	A demarcated edge line defining the outer limits of urban development for a determined period of time; there are two types of edge lines, namely urban development edge lines and coastal edge lines, - the former being a medium- to long-term edge line, where the line has been demarcated in a position to phase urban growth appropriately, or to protect natural resources. The latter being the coastal management line as contemplated in section 25 of the National Environmental Management: Integrated Coastal Management Act, 2008(Act No. 24 of 2008).
Urban Development Zone (UDZ)	The Urban Development Zone is an area demarcated in accordance with the Income Tax Act, Act 58 of 1962 as amended by the Revenues Laws Amendment Act, Act 45 of 2003. In terms of this incentive, taxpayers who construct, improve or purchase a building or part of a building from a developer within this area will be allowed to claim a reduction in taxable income.
Urban footprint	The total spatial extent of existing urban development.
Urban Footprint/ Built-Up/ Built-Area	The total spatial extent of existing urban development.
Urban Heat Island Effect	Where a metropolitan area is significantly warmer due to the heat absorbed by hard surfaces.
Urban management	Urban management involves the area-based involvement of and coordination with end users in the implementation, operation and maintenance of public facilities and services. In the local context, this may include the establishment of City Improvement Districts, Area Coordination Teams or Mayoral Urban Regeneration Programmes. In the long term successful urban management fosters a culture of joint accountability between the City and local stakeholders, reducing the potential of tension usually associated with top-down service delivery.
Urban Node	Area characterised by the intensity, mix and clustering of activities/land uses (including commercial/business development and associated employment opportunities, higher-order services and higher residential densities).
Urban Restructuring Zone	A well-located area where the national housing department's Capital Restructuring Grant subsidy, as defined in terms of the Social Housing Act, Act 16 of 2008, applies.
Urban Support Focus Areas (USFAs)	Spatially targeted areas that are faced with a combination of challenges including but not limited to infrastructure failure and service delivery challenges; high socio-economic need and crime rates and require a co-ordinated public investment and planning approach in the short to medium term. See Priority Local Facilitation Areas (PLFAs).
Vulnerability	The degree to which a system or population is susceptible to, or unable to cope with, adverse events.
Waste Management Facility	Means a place, infrastructure, structure or containment of any kind wherein, upon or at which a waste management activity takes place and includes a waste transfer station, container yard, landfill site, incinerator, a recycling or a composting facility.
Water Sensitive City	A Water Sensitive City is a settlement that serves as a potential water supply catchment, providing a range of different water sources at a range of different scales, and for a range of different uses; provides ecosystem services and a healthy natural environment, thereby offering a range of social, ecological, and economic benefits; and consist of water sensitive communities where citizens have the knowledge and desire to make wise choices about water, are actively engaged in decision-making, and demonstrate positive behaviours such as conserving water at home and not tipping chemicals down the drain.
Water-sensitive urban design	Minimises disruption of the natural water cycle by reducing runoff, attenuating flooding, and treating runoff before discharge into the receiving waters, whilst at the same time increasing the amenity value of water systems, and reducing the cost of water infrastructure.
Working age population	Persons aged 15-64 years.

Water-sensitive urban design	Minimises disruption of the natural water cycle by reducing runoff, attenuating flooding, and treating runoff before discharge into the receiving waters. At the same time, it increases the amenity value of water systems, and reduces the cost of water infrastructure.
World Heritage Site	A natural or man-made site, area, or structure recognized as being of outstanding universal value to humanity as recognised by UNESCO.
Zoning	A category of directions setting out the purpose for which land may be used and the land use restrictions (e.g. height limits, building lines, bulk, and coverage) applicable in respect of the said category of directions by the scheme regulations.
Zoning scheme	A scheme comprising the development management scheme, zoning map and the zoning register. The zoning scheme applies to all land in the geographic area of the city.

TECHNICAL ANNEXURE 2: SCOPE OF THE DISTRICT SDF REVIEW

In addition to the changes required to the District SDFs in terms of the CTMSDF and more recent legislation, policy and strategy developments, the scope of the District SDF Review will generally be limited to the following areas:

1. A shift in focus from a strong policy document to include a strong implementation and enablement agenda incorporating and in some way directing, by providing strategic and holistic guidance, the sector departmental work;
2. The SDF content and process requirements that has to be changed emanating from inter alia the Spatial Planning and Land Use Management Act, Act 16 of 2013 (SPLUMA); Western Cape Land Use Planning Act, Act No. 3 of 2014 (LUPA); and the City of Cape Town Municipal Planning By-law (MPBL), 2015.
3. The requirements of a District SDF as set out in Section 20 and 21 of the SPLUMA and Section 10 of LUPA are attached in Appendix 1. Section 21 of SPLUMA: specifies certain elements for a review including (Appendix 1):
 - Reviewed population growth estimates for the next 5 years;
 - Estimates of economic activity and employment trends; and
 - Requirements for engineering infrastructure and services provision for existing and future development need to be included in an SDF review;
4. The Review of the District SDF will indicate how the City intends to intervene in its particular geographic space by means of the following SPLUMA principles, namely: See Appendix 2.
 - **Spatial justice:** reverse historic spatial planning patterns to prevent ghettoization and segregation, and the unfair allocation of public resources, to ensure that the needs of the poor are prioritised
 - **Spatial sustainability:** support sustainable patterns of consumption and production to prevent damage to the natural environment.
 - **Spatial resilience:** Reduce vulnerability to environmental degradation (natural and potentially also identified semi-natural environments), resource scarcity and climatic shocks by protecting and replenishing the ecological systems.
 - **Spatial quality:** Improve the aesthetic and functional features of the built environment to create livable, vibrant and valued places that allow for access and inclusion of all peoples.
 - **Spatial efficiency:** Support productive activity and jobs and minimise burdens on business. (Efficient transportation of people and goods, “easy” regulatory procedures)

- **Good Administration:** Cooperation amongst state institutions to advance service delivery, address poverty and realise the constitutional rights of citizens and the above principles.
5. Section 11(1) of the MPBL (Appendix 3) sets out, as it relates to the content requirements of the District SDF, that the District SDF must:
- Align to and refine the CTMSDF by incorporating local information that may require a subsequent change to the CTMSDF. In this regard the District SDF will be a refinement of the proposals and guidelines of the CTMSDF. The District SDF will therefore take into account: a) changing local, national and global dynamics; b) impacts of climate change and other major events; c) population, residential and economic growth trends; d) new and updated information (natural resources and infrastructure provision);
 - Align to municipal SDF;
 - Identify and depict important spatial elements
 - Provide land use guidelines that relate to :
 - i) Desirable land use patterns;
 - ii) Appropriate development densities and urban form;
 - iii) Provision of public open space and public facilities
 - iv) Environmentally sensitive areas; and
 - v) High potential agricultural land;
 - Show how spatial restructuring and integration will be achieved by indicating:
 - i) Areas where public and private development should be prioritised and facilitated;
 - ii) Areas where strategic intervention is required to enable desired changes to land use or urban form;
 - iii) Locations of future publicly-funded housing developments;
 - iv) Key infrastructure requirements to enable development of areas that have been prioritised
 - Support the CTMSDF by depicting spatially the coordinating alignment and integration of relevant sectoral plans and policies
 - In addition, the district SDFs will also include:
 - Implementation plans; and
 - Identify local areas requiring detailed planning.
6. In addition, the MPBL states the requirement to consider records of the CTMSDF-deviations, new legislation and recently Council-adopted strategies as well as comments received during the review process

7. Legislative and national policy changes since 2012, to be included in the review of the District SDFs, include:
 - Spatial Planning and Land Use Management Act, 2013, (Act 16 of 2013) ("SPLUMA");
 - Western Cape Land Use Planning Act, 2014 (Act 3 of 2014 ("LUPA);
 - City's Municipal Planning By-Law, 2015 (MPBL);
 - The repeal of the Land Use Planning Ordinance, No. 15 of 1985 (LUPO);
 - National Development Plan (NDP) and Integrated Urban Development Framework (IUDF);
 - Provincial Cabinet approval of the Western Cape Provincial Spatial Development Framework; and the Bioregional Plan 2015; and
 - Sector specific amendments to policy and legislation.

8. City of Cape Town strategies and policies that were approved since 2012 that have been incorporated include:
 - CTMSDF that incorporated the Transit Orientated Development (TOD) Strategic Framework;
 - Master planning for the different utility services;
 - City's adoption of the Environmental -, Economic Growth- and Social Development Strategies (ES, EGS and SDS);
 - City's approval of the Integrated Public Transportation Network (IPTN) and the approval of designated Public Transport Zones (PT Zones);
 - City's initiation of Integration Zone Planning and Investment Strategies and collaborative inter-governmental catalytic projects and programmes as reflected in the City's annual Built Environment Performance Plan (BEPP); and
 - New policies underway, e.g. Environmental Policy/ Sector Plan, Human Settlement Strategy, New Water Plan, etc.

9. Alignment to the CTMSDF and refine the CTMSDF by incorporating local information that may require a subsequent change to the CTMSDF. In this regard the District SDF will be a refinement of the proposals and guidelines of the CTMSDF by:
 - Reviewing, refining and identify ways to implement at a local level the CTMSDF vision, objectives, policy guidelines for the local context;
 - Aligning with the following CTMSDF guiding strategies:
 - Spatial strategy 1: Build an inclusive, integrated, vibrant city.
 - Spatial strategy 2: Manage urban growth, and create a balance between urban development and environmental protection.
 - Spatial strategy 3: Plan for employment, and improve access to economic opportunities.
 - Confirming the cadastral extent and delineation of Spatial Transformation Areas (STAs), i.e. Urban Inner Core, Incremental Growth and Consolidation Areas;

- Confirming the location, designation, and extent of district and local nodes, e.g. civic, transport, economic development, and environmental or corridors; and
 - Contextualise the land use model underpinning the CTMSDF at a district scale.
 - Providing more detailed guidance for the identified areas once the above hierarchy of nodes have been established. This will lead to more local area planning of the identified area, through local policy plans (e.g. Local SDFs), precinct plans or public investment frameworks, as required. However, this level of detailed planning has to be informed by, if it is to be relevant, amongst others, much needed updated land use and IPTN modelling and infrastructure planning.
10. The retention of and use as departure points the key strategies and policy statements of the approved CTMSDF and that these remain the basis of the review. See Appendix 4.
11. Investigations, similar to a land analysis, to inform decision making pertaining to the use and disposal of land. This will require a thorough understanding of the population dynamics, the availability and high level suitability of land, linked to the need for community and social facilities, including green infrastructure assets.

The aim is that this will result in proposals for: overall space planning; the identification of land that should not be disposed of; and allocation of land for particular land use needs, e.g. school, clinics, housing, green open spaces and recreational spaces, etc.

12. A strong focus on Local economic development planning by, amongst others:
- Using land use models (TOD), to direct where different types of land uses ought to be located, e.g. residential or non-residential land uses for city efficiency and sustainability;
 - Identifying sites (land), nodes and corridors (from city structure) that could help to stimulate economic development;
 - Through community inputs, identify strategic locations for economic development opportunity projects, e.g. incubation hubs, emerging entrepreneur support venues for workshops and retail, community gardens, and major projects;
 - Introduce policies and incentives to support and stimulate current and future economic areas, e.g. special enterprise areas, UDZ;
 - Introducing guidelines for the location and use of certain uses, e.g. taverns and house shops; and
 - Providing a platform for local area economic development projects formulation it into a policy and enablement plan (SDF);

- Identify areas to introducing overlay / base zones or incentives for micro or larger economic enterprises, e.g. main roads like Spine Road, Bellville, or TOD base zone etc.;
- Identify areas for proactive rezoning for economic development opportunities, e.g. as was done for Langa;
- Investigating the development of an economic index for land and its location to help business decision marketing; and
- Investigating special community development agencies / SPVs to implement projects and manage development processes.

13. An updated understanding of the development context, taking into account:

- Changing local, national and global dynamics;
- Impacts of climate change and other major events;
- Population, residential and economic growth trends; and
- New and updated information (natural resources and infrastructure provision).

14. Proposals for the repeal of outdated and conflicting policies, e.g. policies that contradict the recent policy shifts of the City.

15. The investigation of mechanisms to boost the right kind of implementation in the right areas. This could include:

- Environment: the EMF to be enhanced to identify areas for exclusion from the requirement to apply for environmental authorisation for selected listed activities in specific geographical areas (for example Atlantis)
- Heritage: Exclusion of areas from the application of Section 24 Heritage triggers, e.g. amongst others, the need for a HIA authorisation for consolidation of three erven or a development greater than 5000m²;
- Land use management: Identification of areas to be given additional/ special development guidelines, e.g. automatic additional rights or reduced / no public participation processes;
- Water use licence general authorisations; and
- Incentives to stimulate the right kind of development in the right location.

These mechanisms will require more detailed work from the respective line departments to inform the District SDF proposals and processes.

Note: Urban management, social and local economic development processes should ideally be initiated, led by the appropriate departments. These processes may run in parallel and draw from the infrastructure of the District SDF Review process to develop appropriate district level strategies for their respective intervention programmes. This is to ensure not only built environment interventions but also a range of parallel interventions, covering the holistic needs of the communities, be formulated for implementation.

Appendixes:

Appendix 1: Requirements of an SDF: SPLUMA Sections 20 and 21 & LUPA Section 10

Appendix 2: Principles Extracted from SPLUMA

Appendix 3: Section 11(1) of the MPBL

Appendix 4: CTMSDF: Key strategies and policy statements

Appendix 1: Requirements of a Spatial Development Framework, SPLUMA Sections 20 and 21 and LUPA Section 10

Preparation of a Municipal Spatial Development Framework (MSDF)

20. (1) The Municipal Council of a municipality must by notice in the Provincial Gazette adopt a municipal spatial development framework for the municipality.

(2) The municipal spatial development framework must be prepared as part of a municipality's integrated development plan in accordance with the provisions of the Municipal Systems Act.

(3) Before adopting the municipal spatial development framework contemplated in subsection (1) and any proposed amendments to the municipal spatial development framework, the Municipal Council must—

- (a) give notice of the proposed municipal spatial development framework in the Gazette and the media;
- (b) invite the public to submit written representations in respect of the proposed municipal spatial development framework to the Municipal Council within 60 days' after the publication of the notice referred to in paragraph (a);
and
- (c) consider all representations received in respect of the proposed municipal spatial development framework.

Content of a Municipal Spatial Development Framework (MSDF)

21. A Municipal Spatial Development Framework must —

- (a) give effect to the development principles and applicable norms and standards set out in Chapter 2;
- (b) include a written and spatial representation of a five-year spatial development plan for the spatial form of the municipality;
- (c) include a longer term spatial development vision statement for the municipal area which indicates a desired spatial growth and development pattern for the next 10 to 20 years;
- (d) identify current and future significant structuring and restructuring elements of the spatial form of the municipality, including development corridors, activity spines and economic nodes where public and private investment will be prioritised and facilitated;

- (e) include population growth estimates for the next five years;
- (f) include estimates of the demand for housing units across different socio-economic categories and the planned location and density of future housing developments;
- (g) include estimates of economic activity and employment trends and locations in the municipal area for the next five years;
- (h) identify, quantify and provide location requirements of engineering infrastructure and services provision for existing and future development needs for the next five years;
- (i) identify the designated areas where a national or provincial inclusionary housing policy may be applicable;
- (j) include a strategic assessment of the environmental pressures and opportunities within the municipal area, including the spatial location of environmental sensitivities, high potential agricultural land and coastal access strips, where applicable;
- (k) identify the designation of areas in the municipality where incremental upgrading approaches to development and regulation will be applicable;
- (l) identify the designation of areas in which—
 - (i) more detailed local plans must be developed; and
 - (ii) shortened land use development procedures may be applicable and land use schemes may be so amended;
- (m) provide the spatial expression of the coordination, alignment and integration of sectoral policies of all municipal departments;
- (n) determine a capital expenditure framework for the municipality's development programmes, depicted spatially;
- (o) determine the purpose, desired impact and structure of the land use management scheme to apply in that municipal area; and
- (p) include an implementation plan comprising of—
 - (i) sectoral requirements, including budgets and resources for implementation;
 - (ii) necessary amendments to a land use scheme;
 - (iii) specification of institutional arrangements necessary for implementation;

(iv) specification of implementation targets, including dates and monitoring indicators; and

(v) specification, where necessary, of any arrangements for partnerships in the implementation process.

Appendix 2: The Spatial Planning and Land Use Management Act Principles

The following principles apply to spatial planning, land development and land use management:

(a) The principle of spatial justice, whereby—

- (i) Past spatial and other development imbalances must be redressed through improved access to and use of land;
- (ii) Spatial development frameworks and policies at all spheres of government must address the inclusion of persons and areas that were previously excluded, with an emphasis on informal settlements, former homeland areas and areas characterised by widespread poverty and deprivation;
- (iii) Spatial planning mechanisms, including land use schemes, must incorporate provisions that enable redress in access to land by disadvantaged communities and persons;
- (iv) land use management systems must include all areas of a municipality and specifically include provisions that are flexible and appropriate for the management of disadvantaged areas, informal settlements and former homeland areas;
- (v) Land development procedures must include provisions that accommodate access to secure tenure and the incremental upgrading of informal areas; and
- (vi) a Municipal Planning Tribunal considering an application before it, may not be impeded or restricted in the exercise of its discretion solely on the ground that the value of land or property is affected by the outcome of the application;

(b) The principle of spatial sustainability, whereby spatial planning and land use management systems must—

- (i) promote land development that is within the fiscal, institutional and administrative means of the Republic;
- (ii) Ensure that special consideration is given to the protection of prime and unique agricultural land;
- (iii) uphold consistency of land use measures in accordance with environmental management instruments;
- (iv) Promote and stimulate the effective and equitable functioning of land markets;

- (v) Consider all current and future costs to all parties for the provision of infrastructure and social services in land developments;
- (vi) Promote land development in locations that are sustainable and limit urban sprawl; and
- (vii) Result in communities that are viable;

(c) The principle of efficiency, whereby—

- (i) land development optimises the use of existing resources and infrastructure;
- (ii) decision-making procedures are designed to minimise negative financial, social, economic or environmental impacts; and
- (iii) development application procedures are efficient and streamlined and timeframes are adhered to by all parties;

(d) The principle of spatial resilience, whereby flexibility in spatial plans, policies and land use management systems are accommodated to ensure sustainable livelihoods in communities most likely to suffer the impacts of economic and environmental shocks; and

(e) The principle of good administration, whereby—

- (i) all spheres of government ensure an integrated approach to land use and land development that is guided by the spatial planning and land use management systems as embodied in this Act;
- (ii) all government departments must provide their sector inputs and comply with any other prescribed requirements during the preparation or amendment of spatial development frameworks;
- (iii) the requirements of any law relating to land development and land use are met timeously;
- (iv) the preparation and amendment of spatial plans, policies, land use schemes as well as procedures for development applications, include transparent processes of public participation that afford all parties the opportunity to provide inputs on matters affecting them; and
- (v) policies, legislation and procedures must be clearly set in order to inform and empower members of the public.

Appendix 3: Section 11(1) of the Municipal Planning By-Law (2015)

District Spatial Development Frameworks (DSDFs)

(1) The Municipal Council may adopt a District Spatial Development Framework for a specified geographic area within the geographical area of the City.

(2) A District Spatial Development Framework must –

(a) align with and give further effect to the municipal spatial development frameworks;

(b) identify and depict on a map current and future significant elements which give structure or spatial order to a settlement including road circulation networks, public transport systems, public open spaces, public facilities, and external engineering services;

(c) provide land use management guidelines that relate to –

(i) desirable land use patterns;

(ii) appropriate development densities and urban form;

(iii) provision of public open space and public facilities;

(iv) environmentally sensitive areas; and

(v) high potential agricultural land;

(d) Provide a spatial representation to support spatial restructuring and integration within the district by indicating –

(i) areas where public and private development should be prioritised and facilitated;

(ii) areas where strategic intervention is required to enable desired changes to land

use or urban form;

(iii) locations of future publicly-funded housing developments;

(iv) key infrastructure requirements to enable development of areas that have been

prioritised;

(e) Support the municipal spatial development framework by depicting spatially the coordination, alignment and integration of relevant sectoral plans or policies of City departments;

(f) Include an implementation plan setting out how the proposals of the district spatial development framework is to be achieved; and

(g) Identify areas where more detailed local spatial development frameworks must be developed.

Appendix 4: Cape Town Metropolitan Spatial Development Framework

Key Strategies:

1. Spatial strategy 1: Building an inclusive, integrated, vibrant city

The City is intent on building a more inclusive, integrated and vibrant city that addresses the legacies of apartheid. Key commitments are to address existing imbalances in the distribution of different types of residential development and avoid the creation of new structural imbalances in the delivery of services. The desired outcomes are a greater mix of income groups, land uses, population density, and the adequate and equitable provision of social facilities, recreational spaces and public institutions.

Imperatives for this spatial strategy are:

- Transforming informal settlements into economically and socially integrated neighbourhoods;
- Forging public-private partnerships to provide and diversify integrated housing delivery;
- Identifying, conserving and managing the heritage resources, cultural landscapes, scenic routes and destination places fundamental to Cape Town's unique sense of place in line with legal requirements, including those of the National Heritage Resources Act;
- Celebrating Cape Town's diverse historical legacies through appropriate management of urban form, architectural design, signage and artwork, and the various land use management tools provided for in the Development Management Scheme;
- Maintaining and creating quality, safe open space systems and public spaces, utilising partnerships and commitments from both the public and private sector to optimise existing facilities, whilst strategically locating new ones; and
- Planning and managing collaboratively in creative and innovative management arrangements to ensure operational sustainability and reduce operational costs.

2. Spatial strategy 2: Manage urban growth, and create a balance between urban development and environmental protection

The City actively promotes an urban form with higher densities and mixed land use patterns within an urban inner core, supported by an extensive and efficient bus rapid transit (BRT) and rail network. Through this form, it wants to achieve developmental outcomes such as more sustainable use of land and natural resources, lower carbon emissions, more efficient use of infrastructure, effective and efficient public transport systems and social amenities.

Imperatives for this spatial strategy are:

- Making more efficient use of non-renewable resources, such as land, water and biodiversity, including protecting and maintaining existing surface and groundwater resources and sustainably managing existing and future water supplies;
- Using the natural environment to support spatial justice by enhancing access for all citizens to a quality open space network, offering community, recreational, non-motorised transport and economic opportunities;
- Avoiding or appropriately managing any negative development impact on natural resources, considering their finite nature and the costs relating to rehabilitating or mitigating degraded natural areas;
- Taking into account biodiversity, aquatic resources and networks as well as agricultural areas when planning new development; and
- Actively pursuing national biodiversity targets as well as those identified in the City's Bioregional Plan.

3. Spatial strategy 3: Plan for employment, and improve access to economic opportunities

Cape Town's current and future spatial form and function supports or inhibits the city's immediate and longer-term economic prospects. The extent to which Cape Town realises its spatial development goals is, directly linked to its ability to sustain employment-generating economic growth in the medium term and to reduce accessibility costs for the urban poor.

Imperatives for this spatial strategy are:

- Establishing and maintaining a liveable, vibrant and productive urban environment through effective urban management and the facilitation of integrated transport and land use;
- Creating and attracting 'job-rich' investment that will ensure integrated, sustainable communities by providing new and maintaining existing infrastructure.
- Providing services aimed at promoting social cohesion and enhancing social mobility in identified areas in greatest need;
- Facilitating economic growth and responding appropriately to the spatial needs of the economic sectors that are attracted to and operate in Cape Town

Policy Statements:

SPATIAL STRATEGY 1: BUILDING AN INCLUSIVE, INTEGRATED, VIBRANT CITY	
POLICY NO.	POLICY STATEMENT
P1	Support the intensification and diversification of land use in areas supportive of transit-oriented development
P2	Ensure that development proposals provide an adequate and equitable distribution of social facilities, recreational space and public institutions
P3	Redress existing imbalances in the distribution of different types of residential development, and actively pursue integration outcomes in future decision-making.
P4	Transform marginalised areas and informal settlements into economically and socially integrated neighbourhoods.
P5	Encourage public/private partnerships to develop integrated human settlements and diversify housing delivery.
P6	Support incremental housing delivery methods and tenure in support of a single property market.
P7	Respond to informality by proactively addressing current regulatory challenges.
P8	Unlock employment-generating and livelihood opportunities within the city's marginalised areas
P9	Support private sector development initiatives in Integration Zones and areas of economic potential that are easily accessible from the city's marginalised areas.
P10	Identify land for land reform and publicly-led housing delivery programmes.
P11	Promote quality urban design and contextual fit.
P12	Identify, conserve and manage heritage resources, including cultural landscapes.
P13	Ensure access to and provide information about public heritage resources.
P14	Create an enabling environment for urban regeneration that allows buildings and sites of historical and architectural significance to make a positive contribution to the economy and quality of urban life.
P15	Celebrate Cape Town's diverse historical legacies through urban form, architectural design, interpretive / information signage and, where appropriate, artwork.
P16	Provide positive spaces for cultural and social ceremonies and life-related events.
P17	Carefully manage land uses and interventions along identified scenic routes, and in places of scenic and visual quality.
P18	Provide efficient access to destination places where potential exists, especially in or near areas of high social need.

SPATIAL STRATEGY 2: MANAGE URBAN GROWTH, AND CREATE A BALANCE BETWEEN URBAN DEVELOPMENT AND ENVIRONMENTAL PROTECTION

POLICY NO.	POLICY STATEMENT
P19	Promote appropriate land use intensity.
P20	Enable resource efficient development.
P21	Direct urban growth away from risk areas/activities.
P22	Discourage urban growth in areas at risk from natural hazards/coastal processes which are expected to be amplified by climate change impacts.
P23	Increase efforts to protect and enhance biodiversity networks at all levels of government.
P24	Reduce the impact of urban development on river systems, wetlands, aquifers, aquifer recharge areas and discharge areas.
P25	Promote risk averse and sustainable urban development along the coast.
P26	Protect valuable agricultural areas, viable farmed areas and horticultural areas from urban encroachment, and support urban agriculture.
P27	Adopt a proactive planning approach to mining resource management.
P28	Support appropriate development and activities in rural areas, and in and around unique and culturally significant rural settlements.
P29	Rationalise and proactively manage smallholdings.

SPATIAL STRATEGY 3: PLAN FOR EMPLOYMENT, AND IMPROVE ACCESS TO ECONOMIC OPPORTUNITIES

POLICY NO.	POLICY STATEMENT
P30	Support investors through improved information, cross-sectoral planning and the removal of red tape.
P31	Introduce land use policies and mechanisms that will support the development of small businesses (both informal and formal).
P32	Strengthen and improve access to existing business nodes through area-based interventions which are geared towards local assets and constraints.
P33	Encourage uptake of available incentives to encourage investment in the Urban Inner Core.
P34	Promote regional economic planning.
P35	Maintain, improve and expand an integrated public transport service informed by the transport network.
P36	Ensure that new urban development is supported by appropriate public transport infrastructure and services.
P37	Include walking and cycling as essential components of land use planning.
P38	Review parking policies to encourage use of the most context-specific and appropriate modal travel choice.
P39	Reinforce and enhance metropolitan development corridors.
P40	Encourage medium-higher density forms of urban development to locate on bus, rail or intermodal stations as well as along corridors and in nodes.
P41	Support the complementary development of the area surrounding CTIA airport in order to further leverage its benefits and opportunities.
P42	Create and manage a functional interface between ports/harbours.

TECHNICAL ANNEXURE 3: LEGAL POLICY AND CONTEXT

3.1. Legislative Context

The legislative context applicable to the District SDFs has changed considerably since 2012. Under the previous planning regime, the Western Cape Government determined a number of municipal planning matters in terms of the Development Facilitation Act, Act 67 of 1995 and the Land Use Planning Ordinance, 15 of 1986 (LUPO). These have subsequently been repealed and replaced by SPLUMA in 2013, the Western Cape Land Use Planning Act, Act 3 of 2014 (LUPA) and the City's Municipal Planning By-Law, 2015 (MPB-L).

- Entrenchment of the autonomous mandate of municipalities in municipal planning¹ (land development, land use management, MSDF approval) with dual approval by the provincial government no longer applicable.
- Establishment of Municipal Planning Tribunals and Appeals structures by municipalities to determine land development applications.
- Development of a single and inclusive land use scheme for the entire municipality;
- Development of SDFs by all three spheres of government, guided by development principles;
- Strengthened intergovernmental support through enforcement, compliance and monitoring.
- Increasing alignment of authorisations processes where necessary on policies and legislation impacting land development applications and decision-making.

In addition to these laws a range of legal informants influence spatial planning in the heritage, environmental, transport and agricultural sectors. This legislation is outlined in Table D2 of the MSDF 2018.

3.1.1. National and Regional Planning Informants

The District SDFs is developed and aligned to the MSDF and as such is aligned to a range of national and provincial planning informants including:

- National Development Plan -2030
- Integrated Urban Development Framework (2015)
- Provincial Spatial Development Framework (2015)
- Bioregional Plan (2015)
- Greater Cape Metropolitan Regional Spatial Implementation Framework 2017

The details of these informants is contained in *Technical Supplement D* of the MSDF 2018.

¹ Municipal competencies are contained in Schedule 4B and 5B of the Constitution of the Republic of South Africa, 1996

3.1.2. Metropolitan Planning Informants

The District SDFs seeks to detail and give greater expression to the strategies, proposals and transformation focus of the MSDF 2018. Proposals regarding land development and public investment in space have thus been informed by:

A. The spatial principles of inward growth and investment and the transformation vision reflected in the IDP and MSDF

The IDP transformation priorities manifest in and are impacted by the built environment. Ensuring spatial transformation via dense and transit-oriented growth and development, anchored by an efficient, integrated transport system and in turn building integrated communities are fundamental to the Metropolitan Planning Outlook and in turn this District Plan review which must align to the MSDF.

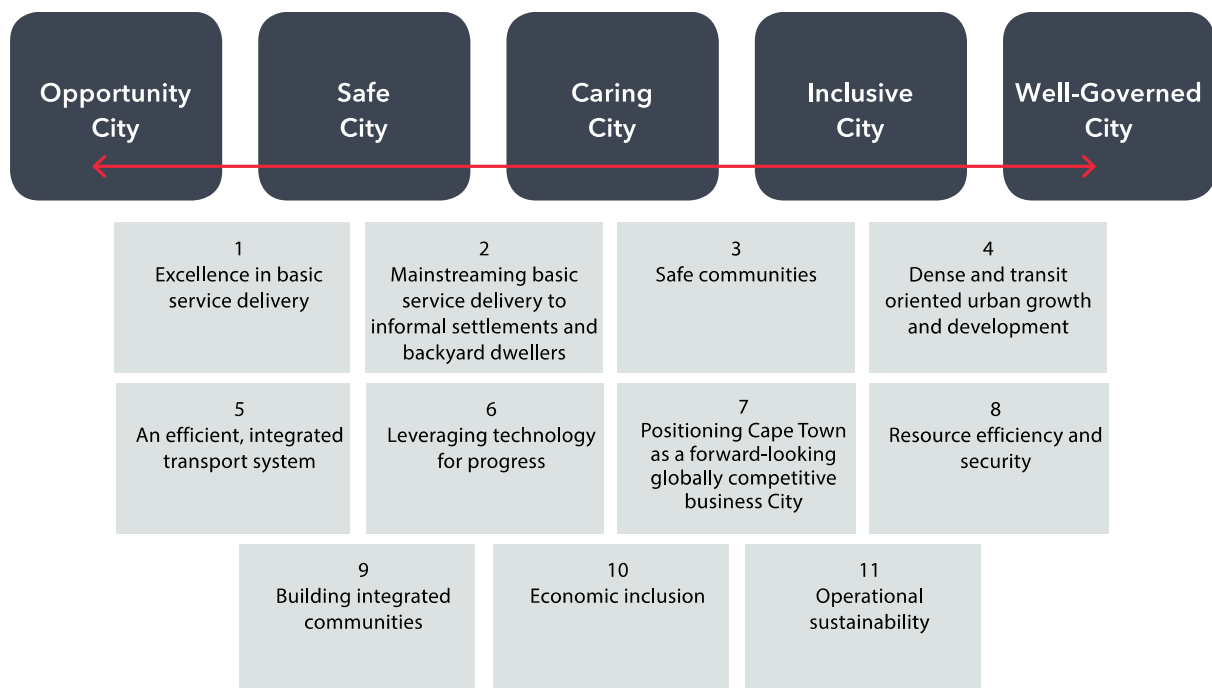


Figure 1: IDP pillars and transformation priorities

The City's spatial transformation focus is on **inward growth and investment** to support infrastructure in support dense, diverse and transit oriented land uses. The Vision for spatial development in the City is as follows:

"The City is intent on building – in partnership with the private and public sector – a more inclusive, integrated and vibrant city that addresses the legacies of apartheid, rectifies existing imbalances in the distribution of different types of residential development, and avoids the creation of new structural imbalances in the delivery of services. Key to achieving this spatial transformation is transit-oriented development (TOD) and the densification and diversification of land uses." MSDF 2018

Connected, inward growth is the most cost-effective way of reducing the social and economic costs of the current inefficient urban form. The MSDF motivates for land use intensification based on transit-oriented development (TOD). With public transport and the optimisation of associated locational benefits fundamental to the restructuring and spatial transformation agenda in Cape Town, Council approved the Comprehensive TOD land use scenario. This forms the strategic and policy basis for Cape Town to transform the sprawling, predominantly low density, mono-use city by reducing travel times and increasing the efficiency of infrastructure networks with benefits to all.

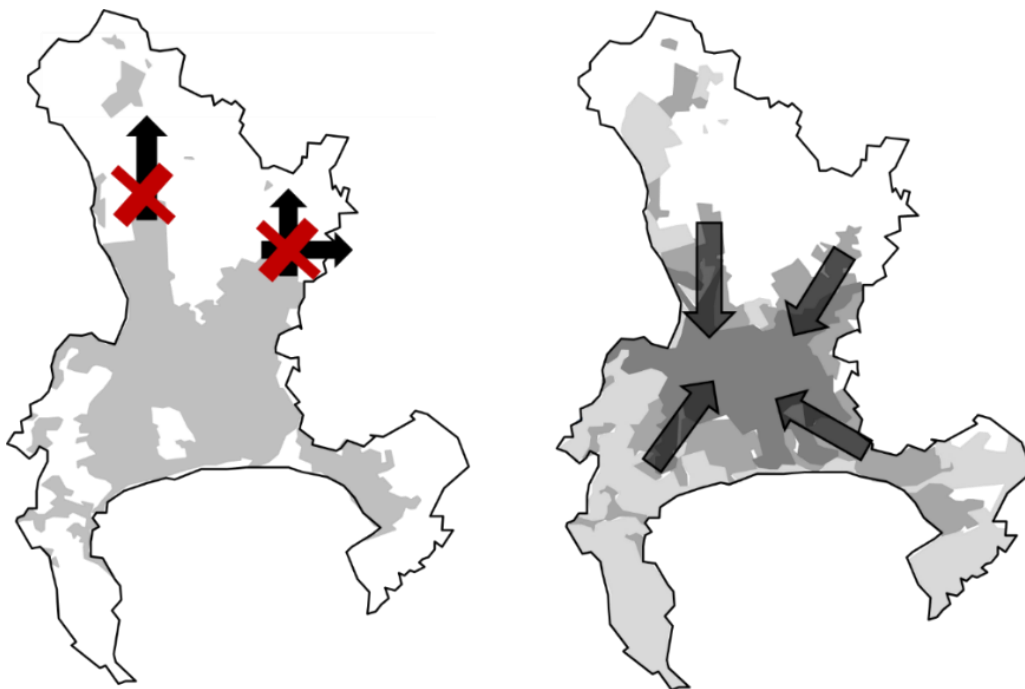


Figure 2: 2012 versus 2017 long-term spatial vision

B. The land uses, structuring elements and areas of intensification proposed

The dense, transit oriented growth vision for the City implies a greater mix of residential and non-residential land use (diversification) through the increased use of space, both vertically and horizontally (densification). This can be achieved within existing areas or properties and new developments with an increased number of dwelling units and should be encouraged in locations with good public transport access, concentrations of employment, commercial development and other amenities.

Development corridors, areas of densification and land use intensification and transit accessible precincts (TAPS), are important spatial restructuring elements in the MSDF, acting as generators and attractors of people and trips, contributing to economic growth and public transport viability. One of the key roles of the District plan is to differentiate between these conceptual structuring elements to ensure the areas of intensification are appropriately nuanced according to the development needs and growth trends in the district.

Infrastructure capacity, renewal and provision will also impact the structure of Cape Town's urban form and must be aligned with projected land use intensification. Prioritising areas where infrastructure investment is needed to support appropriate intensification will be a key outcome of the District Plan process.

C. The investment rationale proposed in the description Spatial Transformation areas

The City is committed to "employing a range of new generation urban growth management tools and processes" and considering "the designation of priority areas, managed growth areas and protection areas with associated development parameters and procedural guidelines". Spatial transformation is based on reversing the impact of apartheid spatial planning by creating more opportunities for more people in highly connected areas. Further, it seeks to counter the creation of new low-income communities on the periphery of the city and the need for the poor to spend a disproportionate amount of their income on transport. The basis for growth management in the City is established via four primary Spatial Transformation Areas (STAs). The Unique areas (area x in this district) where the visions and transformation focus must be prioritised locally, is excluded from these transformation areas.

- An Urban Inner Core (estimated 17% of geographic area of the City) – UIC;
- Incremental Growth and Consolidation Areas (20%) – IGA;
- Discouraged Growth Areas (28%) – DGA;
- Critical Natural Areas (34%) – CNA

Map 4 and Tables 3 and 4 in the MSDF highlight the informants, intended outcomes and investment focus of the Spatial Transformation areas.

D. Development Directives:

The development directives are those environmental, resource, heritage and risk related spatial aspects ordinarily governed by additional or parallel regulatory processes beyond those associated with land use process and applications made via the MPB-L. It is envisaged that the District Plans will provide more detail to the development directives through the Green Infrastructure Plan. Adding further weight, the EMF component which remains in place from the 2012 DP.

E. Strategies and policy guidelines

The Spatial Strategies in the MSDF emanate directly from the IDP and include:

Spatial strategy 1: Build an inclusive, integrated, vibrant city.

Spatial strategy 2: Manage urban growth, and create a balance between urban development and environmental protection

Spatial strategy 3: Plan for employment, and improve access to economic opportunities.

Collectively, they provide the spatial direction that:

- Establishes a corporate spatial perspective which informs the review of this District plan and other sector plans;
- Informs submissions and motivations for development proposals and applications from the public and private sector; and
- Directly affects the assessment of applications under delegation or via the Municipal Planning Tribunal.

A comprehensive list of policies associated with these three strategies is included in Technical Supplement A of the MSDF.

TECHNICAL ANNEXURE 4: ENVIRONMENTAL MANAGEMENT

4.1 Green Infrastructure

Green Infrastructure (GI) can be defined as *"a strategically planned, designed, and managed network of natural open spaces and 'engineered' ecological systems, with other environmental features, which provide ecological, community and infrastructure services."*

The City has embarked on the development of a Green Infrastructure Programme (GIP), the purpose thereof being the protection and enhancement of existing natural assets and the promotion and creation of new GI assets, in order to underpin the sustainability of Cape Town, enhance the city's living environment and improve its resilience to the effects of climate change.

A component of the GIP is the preparation of a Green Infrastructure Network (GINet), based on natural assets and green open spaces in the city, the benefits they provide, and the opportunities that they present in terms of selected predefined ecosystem services (ES). They form a network through connection via existing and potential green corridors.

The approach taken to the mapping of the GINet, has utilised officials' local knowledge to identify, via a series of questions and criteria, those areas in the city that can be considered to be GI, by qualifying and quantifying their relative ES value for predefined ES. The spaces considered are based on typologies, are generally greater than 1ha in size, and are in both public and private ownership.

The output of that mapping exercise is the Green Infrastructure Network (GINet). This layer is intended to be an informant when considering land-use and development applications, and should be taken into consideration when evaluating proposals.

Each space, displayed in varying shades of green, can be 'interrogated' for the information relating to it, and its ascribed value. This space specific information needs to be considered when conceptualising, designing, planning and ultimately developing a property which has been identified as providing GI services. A GINet viewer is being created, which will be available on the CityMap Viewer.

The space specific information displayed, reflects the responses to 9 general questions and 23 ecosystem evaluation questions (see below), that were posed for each space. It also provides the contribution made to the 3 ecosystem service themes the questions have been grouped into, namely infrastructural, ecological and social services. Infrastructural questions relate to water and coastal zone protection aspects, and essentially investigate ES that provide nature-based solutions that support areas which would otherwise need hard or grey infrastructure interventions if lost. Ecological questions relate to ecological-related ES, e.g. habitat and connectivity, species; and social questions relate to social-cultural ES, including how the space is used.

The evaluation questions are rated in terms of the space providing none, low, medium or high contribution of the service, and the scores from each question are then totalled to provide a Total GI value, which is translated into a level of Total GI provided by the space. The level of Total GI of each space is categorised into low, low-medium, medium, medium-high, high or very high.

It is important to note that the **Total GI** rating is the **cumulative score** of the 23 questions relating to the various ecosystem services. **A lower rating does not imply that a space is not important**; it may be very important for a specific ecosystem service.

Scores have also been normalised to determine the contribution of each theme to the total GI value. Where these contribute more than 10% of the total GI value, they are regarded as being a key service provision component (theme). The information can also be selected to display as per the ecosystem service provision components or themes.

Potential to improve a space is identified for selected ecosystems services only – indicated by an asterisk (*) on the list of questions below. Where potential is present this is noted, but not allocated a rating. On the mapping (on the forthcoming GI Viewer), potential is indicated by a cross hatching over the Total GI value. It is important to note that a low GI value does not mean that the space does not have value in terms of its potential - where focussed interventions could improve the space's ES provision and that of adjacent or surrounding GI assets.

Additional information has been captured as relevant from discussions during the evaluation session.

A summary of the questions posed is below.

General questions (9)

Q	
1	Does this space have a wetland/seep/stormwater pond/dam, etc.?
2	Is this space within the Coastal Urban Edge?
3	Is this space part of the terrestrial Biodiversity Network?
4	Does this space include a river/stream (natural, semi-natural, canalised, channelized)?
5	Is this space a Nature Reserve / Conservation Area / Protected Natural Environment?
6	Is this space accessible to the public?
7	Does it have the potential to provide industrial and building resources (i.e. coincides with mapped resources – e.g. silica sand, timber, building sand, kaolin)?
8	Is this space perceived as safe?
9	Does this space have trees (>3m in height)? If yes, what is their percentage canopy cover? (none = 0% or negligible; low = 5-15%; medium = 15-50%; high = >50%)

Ecosystems service questions (23)

Q		Infrastructural questions
1	*	Does the space assist with water assimilation and purification? To what extent?
2		Is this space above a sand aquifer?
3		Does the space contribute to water infiltration? To what extent?
4	*	Does the space assist with flood control? To what extent?
5		Does the space provide water? To what extent?
6	*	Does the space offer protection/buffering of built infrastructure against coastal processes or during coastal storm events? To what extent?

Q		Ecological questions
7		Does this space have indigenous vegetation? What relative percentage does it cover? (none = 0%; low = 5-25%; medium = 25-65%; high => 65%)
8		Does the space have threatened flora? How important is the flora?
9		Is the space evidently used by fauna listed as species of conservation concern or large fauna? To what extent?
10		Is this space evidently an indigenous faunal breeding, roosting, nursery, or den site (important for lifecycle / reproduction)? To what extent?
11	*	Is this space used for or does it provide opportunity for ecological connectivity? To what extent?
12		Is this space an area of high conservation value or, if not, does it act as a buffer to areas of high conservation value? To what extent?
13		Does this space support or allow for coastal processes? To what extent?

Q		Social questions
14		Do the trees in this space have a social, economic and/or cultural function? If yes, to what extent?
15		Is this space used for spiritual or cultural rituals and/or activities? If yes, to what extent?
16	*	Is this space being used for general public recreational/activities? If yes, to what extent?
17		Does this space have any cultural or heritage value or significance? What is its relative significance?
18	*	Is this space used for environmental education or research purposes? To what extent?
19		Do tourists visit this space or is it along a significant tourist route? To what extent?
20		Is there a significant viewshed or vista from the space adding aesthetic appeal? What is the relative value of the viewshed?
21		Does this space have aesthetic appeal and/or provide a sense of place or identity? What is the relative value?
22		Are natural resources harvested or extracted from this space for subsistence purposes? (e.g. Sand, medicinal plants, food/fish, kelp, mussels) To what extent?
23		Is the space used for agricultural or producing food? To what extent?

GI mapping and evaluation was undertaken during October 2018 – December 2019, using the February 2018 aerial photography as the basis for delineating spaces for evaluation. Open space that had been subsequently invaded, or for which development was at an advanced stage of planning approval, was excluded from the mapping exercise. Additional information captured has been edited in 2020. An update to the mapping was undertaken in 2021. This utilised 2021 aerial photography, in both a desktop comparison with 2018 aerial photography to determine change, as well as engagements with district staff.

Potential GINet corridors were mapped in 2020. These corridors run through the GIP polygons and form best-fit linkages in order to connect green spaces across the city. It takes ecological factors, as well as social and infrastructural factors into account. The corridor mapping was refined in 2021 to designate major green corridors i.e. existing connections associated with conserved areas or features (e.g. watercourses, road reserves, utility servitudes, tree-line streets), and 'flexible green corridors', which indicates that connection is required to be retained or created over that space, but that the actual alignment of the corridor needs definition and to be taken into account during a development/ redevelopment process. Ongoing refinement of corridors is planned.

Having well-maintained corridors in the city is essential to avoiding habitat fragmentation, promoting environmental connectivity, providing space for recreation and other activities, etc. The methodology and approach to creating the corridors is available.

4.2 Details of a proposed NEMA Urban Area for the City of Cape Town

4.2.1 What is the NEMA Urban Area?

The Listed Activities contained in the National Environmental Management Act (NEMA) Environmental Impact Regulations (2014, as amended), make provision for the adoption, by the Competent Authority (Department of Environmental Affairs & Development Planning) of a NEMA Urban Area. It is important to note that the NEMA Urban Area is something completely different to the Urban Edge typically portrayed in spatial development frameworks, although, in many cases they may be the same thing (the ideal situation). The main reason for this provision was to enable certain of the Environmental Impact Assessment (EIA) Regulations listed activities to take place within urban areas without the requirement to obtain environmental authorisation – and thus facilitate provision of infrastructure and services. The assumption behind this, is that urban environments are generally less sensitive to development, but in cities like Cape Town, this is not always the case. The provision for exclusion of some development activities when located within adopted NEMA Urban Areas (e.g. water and sewage pipelines) (see Addendum 1) from requiring environmental authorisation, can facilitate urban development. However, if the area in which these services are to be provided has, for example, critically endangered vegetation, removal of such vegetation for the pipeline will still trigger the requirement for an environmental authorisation and the associated Basic or Full Scoping EIA process.

The Listed Activities (2014, as amended) define NEMA Urban areas as:

'areas situated within the urban edge (as defined or adopted by the Competent Authority), or in instances where no urban edge or boundary has been defined or adopted, it refers to areas situated within the edge of built up areas'.

However, the Department of Environmental Affairs & Development Planning (DEA&DP), have indicated, that the City of Cape Town may propose a NEMA Urban Area according to the intent and objectives of its Integrated District Spatial Development Frameworks/Environmental Management Frameworks (SDFs/EMFs). They will then decide if it may be 'adopted' as a NEMA Urban Area. The Urban Edge, as proposed in the District SDFs/EMFs would also need to be adopted by DEA&DP.

4.2.2. Why should the City of Cape Town have an adopted NEMA Urban Area?

The main reason for having an 'adopted' NEMA Urban Area, is that there are a number of listed activities (i.e. activities in the NEMA EIA Regulation Listing Notices) that are excluded from requiring authorisation if they fall within an 'adopted' NEMA urban area. A list of these 'excluded' activities is given in Addendum 1. The CCT does not, as yet, have an 'adopted' NEMA Urban Area. This results in inconsistent decision making as to what is inside or outside the NEMA Urban Area. It is therefore better to have an agreed and adopted NEMA Urban Area, which will provide more certainty to developers, including the City. The revision of the district Spatial Development Plans, and their ultimate adoption as Environmental Management

Instruments (including an adopted NEMA Urban Area) provides an opportunity to remove yet one more area where there can be inconsistencies in decision making.

4.2.3. How does the NEMA Urban Area relate to the City of Cape Town Urban Edge?

The ideal situation is that the City's Urban Edge, and the NEMA Urban Area are the same, making for easy decision making. The City has undertaken workshops in the City's planning districts to try to maximise the extent to which the two coincide. There are however some areas where they are different, particularly if there is a large rural area or a conservation area adjacent to the Urban Edge, where urban development is not intended. It is possible, that through further consultation and revisions, that the Urban Edge and Urban Area could be the same.

4.2.4. Why does the NEMA Urban Area sometimes cover areas that may be considered environmentally sensitive?

It is very important to note that the NEMA Urban Area, as depicted in the City of Cape Town SDFs/EMFs does **not** indicate desirability or intent to develop an area. This is something that is often misunderstood, and can lead to confusion. The *Development Focus Areas* and more specifically, the *New Development Areas*, as depicted in the District SDFs/EMFs are where development is to be encouraged and supported.

It is, however recognised, that by placing the NEMA Urban Area designation over an environmentally sensitive environment, one may eliminate the need for an environmental authorisation process if only NEMA Urban Area excluded activities are applicable. Most sensitive areas will however, have either indigenous vegetation, or wetlands and streams that will trigger the requirement for an environmental authorisation. Other legislation, such as the National Water Act (Act 36 of 1998) and the National Heritage Resources Act (Act 25 of 1999) will also require authorisations with associated studies where wetlands and water courses are affected, or in the case of the National Heritage Resources Act (Act 25 of 1999), where cultural, archaeological and palaeontological assets may be affected, including visual impact and sense of place. In addition, it is also very important that the City, in its District SDFs/EMFs and supporting documents, clearly identify sensitive areas and ensure, through a variety of means, that their key characteristics and functioning are maintained, for example through identification of risk areas and edges such as floodplains, expanding the protected area network, and well implemented policies, strategies and by-laws. In addition, the Environmental Management Department is able to request specific studies to be done as part of the land use process.

So one may ask, why place the NEMA Urban Area over sensitive areas? The main reasons are that:

- In some instances, it is possible to do developments without affecting the sensitive components (for example placing infrastructure in already developed areas or along roads and servitudes).
- There can be significant cost and time savings if only the essential studies are done.

To ensure that there are no unintended consequences, it is essential that the City continue to improve its methods of retaining and improving all natural and semi-natural areas that provide ecological and infrastructural services. This includes ensuring all sensitive areas have the correct zoning. The developing Green Infrastructure Network, the Environmental Strategy and incorporation of environmental requirements into policies, procedures and by-laws across the city (all underway) will all play a role in improving the City's ability to protect and enhance its natural systems.

4.3 The Proposed Exclusions from the Trigger Activities Listed in Section 24 of NEMA

Given below are summarised descriptions of the Listed Activities contained in the Environmental Impact Assessment Regulations Listing Notices (2014, as amended) that are excluded from requiring environmental authorisation when they are located within an adopted NEMA Urban Area.

Table 1 gives those Listed Activities that are excluded when they take place in adopted NEMA Urban Areas. Table 2 gives those Listed Activities that are different (i.e. have different thresholds) when taking place inside or outside NEMA Urban Areas.

In all cases, the requirement for an environmental authorisation would still be applicable if any other Listed Activity is to take place, which does not have the Urban Area exclusion provision. For example, removal of critically endangered vegetation, or development in wetlands would still require environmental authorisation if the Listed Activity thresholds apply. The comments in the right hand column emphasise this fact. Please refer to the accompanying explanatory text.

Please note: These activity descriptions have been summarised from the EIA Regulations: please refer to the EIA Regulations for the full description.

Table 1: Listed Activities triggered outside Urban Areas but not inside Urban Areas: i.e. the activities below are excluded inside NEMA Urban Areas

Listing Notice (LN) & Activity Number	Activity	Comments/Implications
LN1, A1	Development of facilities or infrastructure for photovoltaic installations: - Where the electricity output is more than 10MW but less than 20MW <u>or</u> - Where the electricity output is 10MW or less but the extent of the facility covers an area in excess of 1ha.	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m ² or more endangered or critically endangered indigenous vegetation) and possibly the National Water Act (NWA).

L1, A9	Water & stormwater pipelines exceeding 1 000m in length: • With an internal diameter of 0,36m or more <u>or</u> • With a peak throughput of 120l/s or more	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m ² or more endangered or critically endangered indigenous vegetation) and possibly the NWA.
L1, A10	Pipelines for bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes, exceeding 1 000m in length: • With an internal diameter of 0,36m or more <u>or</u> With a peak throughput of 120l/s or more	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m ² or more endangered or critically endangered indigenous vegetation) and possibly the NWA. Any development in close proximity to watercourses will require a Water Use Licence (WUL) in terms of NWA.
L1, A12	Construction of dams, weirs, infrastructure or structures exceeding 100m ² in size • In a watercourse, • In front of a development setback or • Within 32m of a watercourse (where there is no development setback).	If construction takes place in the watercourse, NEMA will still be triggered (L1, A19) and the NWA will be triggered. The NWA will also be triggered if development does not take place in the watercourse but may negatively impact on the watercourse.
L1, A17	Development of fixed or floating jetties and slipways, tidal pools, embankments, rock revetments or stabilising structures including stabilising walls or infrastructure or structures with a development footprint of 50m ² or more.	L1, A19A will still be triggered if 5m ³ material or more is removed from, deposited into or moved in the sea, littoral active zone, 100m inland from the high-water mark of the sea, an estuary, the seashore.
L1, A24	New roads: • For which an EA was obtained for the route determination in terms of activity 5 in Government Gazette Notice 386 of 2006 or activity 18 in Government Notice 545 of 2010 or • With a reserve wider than 13,5m, or with no reserve where the road is wider than 8m	Even inside Urban Areas, if the new road requires the removal of 300m ² or more of endangered or critically endangered indigenous vegetation or requires construction to take place in a watercourse, NEMA will still be triggered. The NWA may also be triggered.

L1, A36	Expansion of photovoltaic installations where: • Electricity output will be increase by 10MW or more or • Regardless the increased output, the development footprint will be expanded by 1ha or more	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m² or more endangered or critically endangered indigenous vegetation) and possibly the NWA.
L1, A45	Expansion of water or storm water pipelines where existing infrastructure: • Has an internal diameter of 0,36m or more or • Has a peak throughput of 120l/s or more and ◦ Where the facility or infrastructure is expanded by more than 1 000m in length or ◦ Where the throughput capacity of the facility or infrastructure will be increased by 10% or more.	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m² or more endangered or critically endangered indigenous vegetation) and possibly the NWA.
L1, A46	Expansion of sewage, effluent, process water, waste water, return water, industrial discharge or slimes pipelines where existing infrastructure: • Has an internal diameter of 0,36m or more or • Has a peak throughput of 120l/s or more and ◦ Where the facility or infrastructure is expanded by more than 1 000m in length or Where the throughput capacity of the facility or infrastructure will be increased by 10% or more.	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m² or more endangered or critically endangered indigenous vegetation) and possibly the NWA. Any development in close proximity to watercourses will require a WUL in terms of NWA anyway.

L1, A48	Expansion of structures, infrastructure, dams or weirs where the footprint or water surface area is expanded by 100m ² or more.	If expansion requires the removal of indigenous vegetation or takes place in watercourses, NEMA will still be triggered. Construction in a watercourse will also trigger the NWA.
L1, A54	Expansion of facilities in the sea, an estuary, within the littoral active zone, in front of a development setback or if no development setback exists, within a distance of 100m inland of the high-water mark of the sea.	Expansion activities in these areas requiring the removal, moving or infilling of 5m ³ or more material in these areas will still trigger NEMA.
L1, A56	Widening of a road by more than 8m, or lengthening of a road by more than 1km: • Where the existing reserve is wider than 13,5m or • Where no reserve existing, where the existing road is wider than 8m.	If the widening or lengthening takes place in an environmentally sensitive area, the removal of 300m ² or more endangered or critically endangered vegetation will still be a trigger. Construction in a watercourse will also trigger NEMA and the NWA.
L2, A1	Photovoltaic installations, with an electricity output of 20MW or more.	If this takes place in an environmentally sensitive area, the presence of indigenous vegetation and watercourses would still trigger NEMA (removal of 300m ² or more endangered or critically endangered indigenous vegetation) and possibly the NWA.
L2, A27	Development of a road • With a reserve wider than 30m or • Catering for more than one lane of traffic in both directions.	If the new road is located in an environmentally sensitive area, the removal of 300m ² or more endangered or critically endangered vegetation will still be a trigger. Construction in a watercourse will also trigger NEMA and the NWA.
L3, A1	Billboards exceeding 18m ² in size.	If the construction of the billboards requires the removal of 300m ² or more of endangered or critically endangered indigenous vegetation, NEMA will still be triggered. Any development in watercourses will also trigger NEMA and the NWA.
L3, A7	Aircraft landing strips and runways 1,4km and shorter.	If the activity requires the removal of 300m ² of endangered or critically endangered indigenous vegetation, NEMA will still be triggered. Any development in watercourses will also trigger NEMA and the NWA.
L3, A8	Development and related operation of above ground cableways and funiculars.	If the activity requires the removal of 300m ² or more of endangered or critically endangered indigenous vegetation, NEMA will still be triggered. Any development in watercourses will also trigger NEMA and the NWA.

L3 A14	Development of dams, weirs, infrastructure or structure with a footprint exceeding 10m² where development occurs: • Within a watercourse, • In front of a development setback, • If no development setback has been adopted, within 32m of the watercourse.	If the activity requires the removal of 300m² or more of endangered or critically endangered indigenous vegetation, NEMA will still be triggered. Any development in watercourses will also trigger NEMA (infilling, removal or moving of more than 10m³ in the watercourse) and the NWA.
L3, A19	Expansion of runways or aircraft landing strips where the expanded aircraft of landing strip will be longer than 1,4km in length.	If the expansion requires the removal of 300m² or more of endangered or critically endangered indigenous vegetation, NEMA will be triggered. Any development in watercourses will also trigger NEMA (infilling, removal or moving of more than 10m³ in the watercourse) and the NWA.
L3, A20	Expansion and related operation of above ground cableways and funiculars where the development footprint will be increased.	If the expansion requires the removal of 300m² or more of endangered or critically endangered indigenous vegetation, NEMA will be triggered. Any development in watercourses will also trigger NEMA (infilling, removal or moving of more than 10m³ in the watercourse) and the NWA.
L3, A23	Expansion of dams, weirs, structures or infrastructure by 10m² where expansion occurs • Within a watercourse, • In front of a development setback, • If no development setback exists, within 32m of the watercourse.	If the expansion requires the removal of 300m² or more of endangered or critically endangered indigenous vegetation, NEMA will be triggered. Any development in watercourses will also trigger NEMA (infilling, removal or moving of more than 10m³ in the watercourse) and the NWA.

Table 2: Listed Activities that are different inside and outside Urban Areas

Listing Notice & Activity Number	Activity	Comments/Implications
L1. A5	Development of facilities or infrastructure for the concentration of poultry and chicks younger than 20 days.	The thresholds are different for inside and outside Urban Areas, farms/facilities inside Urban Areas have a lower threshold than outside Urban Areas. If the farm/facility is inside the urban area the activity will trigger faster.
L1, A11	Development of facilities or infrastructure for the transmission and distribution of electricity.	This activity triggers inside and outside the urban area, the thresholds are just different. If this activity does not trigger in an environmentally sensitive area, the removal of 300m ² or more endangered or critically endangered indigenous vegetation or construction in watercourses will trigger NEMA. Construction in watercourses will also trigger the NWA.
L1, A28	Residential, mixed, retail, commercial, industrial or institutional development where land was used for agriculture, game farming, equestrian purposes or afforestation on or after 1 April 1998.	This activity has different thresholds for inside and outside the urban area. Inside the urban area the threshold to trigger the activity is higher than outside the urban area making it easier to transform the land inside the urban area. If construction takes place in watercourses, NEMA will trigger. The NWA will be triggered if construction takes place in watercourses or in close proximity to watercourses.
L1, A40	Expansion and related operation of facilities for the concentration of poultry, excluding chicks younger than 20 days.	The thresholds are different for inside and outside Urban Areas, farms/facilities inside Urban Areas have a lower threshold than outside Urban Areas. If the farm/facility is inside the urban area the activity will trigger faster.
L3, A2	Development of reservoirs with a capacity of more than 250m ³ .	Will still trigger if • The site is protected in terms of NEMPAA, • There is indigenous vegetation on the site, • Inside Urban Areas: zoned POS, • Inside Urban Areas: designated for conservation use in SDF or zoned for conservation purposes.

		If the activity takes place in an environmentally sensitive area which does not fall under the above, the removal of 300m² or more endangered or critically endangered indigenous vegetation will still trigger NEMA. Construction in a watercourse will trigger NEMA and the NWA.
L3, A3	Development of masts or towers used for telecommunication broadcasting or radio transmission purposes. Where the mast or tower: • Is placed on a site not previously used for this purpose or • Will exceed 15m in height.	Excluding attachments to existing buildings and masts on rooftops. Will trigger in: • Areas outside Urban Areas, • In Urban Areas: Areas designated for conservation in SDF, • In Urban Areas: zoned for conservation purpose, • In Urban Areas: zoned POS or equivalent. If any environmentally sensitive areas are not zoned for conservation or POS, and 300m² or more endangered or critically endangered indigenous vegetation is removed, NEMA will still trigger. Any development in watercourses will trigger NEMA and the NWA.
L3, A4	Development of roads wider than 4m with a reserve less than 13,5m	Will still trigger: • In areas zoned for POS or equivalent, • Outside Urban Areas: containing indigenous vegetation, • Outside Urban Areas: on the estuary side of the development setback line or in an estuarine functional zone if no setback line has been determined, • Inside Urban Areas: zoned for conservation, • Inside Urban Areas: designated for conservation in a SDF. Construction in watercourses will trigger NEMA and the NWA inside and outside Urban Areas. Removal of 300m² or more endangered or critically endangered indigenous vegetation will trigger NEMA.

L3, A6	Development of resorts, lodges, hotels, tourism or hospitality facilities that sleeps 15 people or more.	Will trigger: • Inside protected areas identified in terms of NEMPAA, • Outside Urban Areas: critical biodiversity areas identified in systematic biodiversity plans adopted by the competent authority, • Outside Urban Areas: within 5km from national parks, WHS, areas identified in terms of NEMPAA or from core of a biosphere reserve. Will trigger inside NEMPAA nature reserves If 300m² or more endangered or critically endangered indigenous vegetation is removed, NEMA will trigger inside and outside the urban area. If construction takes place in a watercourse, NEMA and NWA will be triggered.
L3, A10	Development and related operation of facilities or infrastructure for the storage, or storage and handling of dangerous goods (Note: the threshold for this trigger is between 30 and 80 cubic meters) i.e. a lot of fuel or other dangerous good.	Will trigger: • Areas zoned POS or equivalent, • Outside Urban Areas, • Inside Urban Areas: areas seawards of the development setback line, or within 200m of high-water mark of the sea if no such setback line is determined, • Inside Urban Areas: Areas on watercourse side of development setback, or within 100m of edge of watercourse where no setback has been determined. Could impact on nature reserves if they are not zoned POS or equivalent and the area to be cleared for the storage facilities are smaller than 300m² in size. If construction takes place in a watercourse NEMA and the NWA will trigger.

L3, A11	Development of tracks or routes for testing, recreational use or outdoor racing of motor powered vehicles.	Will trigger in: • Areas on the estuary side of the development setback, or in an estuarine functional zone where no setback line has been determined, • Seawards of the development setback line or within 200m of the high-water mark of the sea, if no setback line is determined, • Areas of indigenous vegetation outside Urban Areas. Development in environmentally sensitive areas, which requires the removal of 300m² or more endangered or critically endangered indigenous vegetation, will trigger NEMA. Any development in watercourses or the sea, seashore, littoral active zone which requires the infilling of, removal of or moving of material in these areas will trigger NEMA. Development in watercourses will trigger the NWA.
L3, A15	Transformation of land bigger than 1 000m ² to residential, retail, commercial, industrial or institutional use where the land was zoned open space, conservation or equivalently zoned on or after 2 August 2012.	This will trigger: • Outside Urban Areas, • Inside Urban Areas: Zoned for conservation or equivalent, • Inside Urban Areas: Protected in terms of NEMPAA, • Inside Urban Areas: Sensitive areas identified in an EMF. If there are environmentally sensitive areas which are not zoned for conservation (or equivalent), protected in terms of NEMPAA or identified as sensitive in the EMF, these sensitive areas would most likely be covered in indigenous vegetation or have watercourses which will trigger NEMA and/or the NWA.
L3:A16	Expansion of reservoirs where the capacity will be increased by more than 250m ³ .	This will trigger in: • Areas protected in terms of NEMPAA, • Areas containing indigenous vegetation, • Inside Urban Areas: Areas zoned as POS, • Inside Urban Areas: Areas designated for conservation use in SDF or zoned for conservation purposes, including residential areas.

		This activity will trigger more easily inside than outside the urban area. Could make it more difficult to construct reservoirs on properties now considered inside the urban area.
L3, A17	Expansion of a resort, lodge, hotel, tourism or hospitality facility.	Will trigger: • Inside areas protected in terms of NEMPAA, • Outside Urban Areas: Critical biodiversity areas identified in systematic biodiversity plans, • Outside Urban Areas: Within 5km of national parks, world heritage sites, areas identified in terms of NEMPAA or from core area of a biosphere reserve. The trigger for within 5km of national parks, WHS, biosphere reserves would not apply inside the Urban Area. However, environmentally sensitive areas covered in endangered or critically endangered indigenous vegetation or watercourses will still trigger NEMA due to removal of indigenous vegetation or construction in watercourses. Construction in watercourses will also trigger the NWA.
L3, A18	Widening of a road by more than 4m or lengthening of a road by more than 1km.	Will trigger if: • An area is zoned as POS or equivalent zoning, • Outside Urban Areas: containing indigenous vegetation, • Outside Urban Areas: on the estuary side of the development setback line or in an estuarine functional zone where no setback line has been determined, • Inside Urban Areas: Zoned for conservation, • Inside Urban Areas: designated for conservation in SDF This listed activity may not trigger inside an urban <u>area</u> if <u>indigenous vegetation</u> is removed but the removal of 300m² or more endangered or critically endangered indigenous vegetation will still be a trigger. Development in a watercourse will also trigger NEMA and the NWA.

L3, A21	Expansion of tracks or routes for the testing, recreational use or outdoor racing of motor powered vehicles.	Will trigger if: • Area is on estuary side of development setback line, or in an estuarine functional zone where no setback line exists, • Areas is seawards of the development setback line or within 200m from the high water mark of the sea if no setback line has been determined, • Outside Urban Areas: areas of indigenous vegetation. This activity may not trigger where indigenous vegetation is removed inside an urban area, but the removal of 300m² or more endangered or critically endangered indigenous vegetation will trigger NEMA. Construction in a watercourse will trigger NEMA and the NWA.
L3, A22	Expansion and related operation of facilities or infrastructure for the storage or storage and handling of dangerous goods.	Will trigger if: • Areas are zoned POS, conservation or equivalent, • Areas are outside Urban Areas, • Inside Urban Areas: areas seawards of the development setback line or within 200m of the high-water mark of the sea if no setback line exists, • Inside Urban Areas: areas on watercourse side of development setback line or within 100m of edge of watercourse where no setback line has been determined, • Inside Urban Areas: areas on estuary side of the development setback line or in an estuarine functional zone where no setback line has been determined. This activity will trigger in close proximity to watercourses inside Urban Areas. If 300m² or more endangered or critically endangered indigenous vegetation is removed, Listing Notice 3, Activity 12 will also trigger.

TECHNICAL ANNEXURE 5: GROUND WATER PROTECTION- POTENTIALLY CONTAMINATING ACTIVITIES

The highest level of risk is represented by the number 4, and the lowest level of risk is represented by the number 1 (Division of Drinking Water and Environmental Management, 1999 (California-based guidelines))

Table 3: List of Potentially Contaminating Activities

Source	Contaminants	Level of Risk
Commercial/industrial		
Automobile body shops/repair shops	Waste oils; solvents; acids; paints; automotive wastes, cutting oils	3
Car washes	Soaps; detergents; waxes; miscellaneous chemicals; hydro carbons	2
Gas stations/ sumps	Oils; solvents; miscellaneous wastes	4
Cement/ concrete plants	Diesel fuels; solvents; oils; miscellaneous wastes; salts; high pH	2
Chemical/ petroleum processing/ storage	Hazardous chemicals; solvents; hydrocarbons; heavy metals; asphalt	4
Dry cleaners	Solvents (perchloroethylene, petroleum solvents, Freon); spotting chemicals (trichloroethane, methylchloroform, ammonia peroxides, hydrochloric acid, rustremovers, amyl acetate)	4
Electrical/ electronic manufacturing	Cyanides; metal sludges; caustic (chromic acid); solvents; oils; alkalis; acids; paints and paint sludges; calcium fluoride sludges; methylene chloride; perchloroethylene; trichloroethane; acetone; methanol; toluene; PCB's	3
Fleet trucking/ trucking/ bus terminals	Waste oil; solvents; gasoline and diesel fuel from the vehicles and storage tanks; fuel oil; other motive waste	3
Food processing	Nitrates; salts; phosphorous; miscellaneous food wastes; chlorine; ammonia; ethylene glycol	2
Funeral services/ graveyards	Formaldehyde; wetting agents; fumigants; solvents; leachate;	2

	lawn and garden maintenance chemicals	
Hardware/ lumber/ parts store	Hazardous chemicals product; heating oil and forklift oils from storage tanks; wood-staining and treating products i.e. creosote; paints; thinners; lacquers; varnishes	2
Home manufacturing	Solvents; paints; glues and other adhesives; waste insulation; lacquers; tars; sealants; epoxy wastes; miscellaneous chemical wastes	3
Source	Contaminants	Level of Risk
Junk/ scraps/ salvage yard	Automotive wastes; PCB contaminated wastes; any wastes from businesses; and households; oils; lead pesticides for controlling mosquitoes, ants, ticks, moths and other pests; household hazardous wastes	3
Drinking water treatment plants	Treatment chemicals; pesticides	2
Fire stations	General building wastes; hydrocarbons from test burn areas	1
Golf courses	Fertilizers; herbicides; pesticides for controlling pests	2
Housing	<i>Household hazardous waste:</i> Household cleaners; oven cleaners; drain cleaners; toilet cleaners disinfectant; metal polishes; jewellery cleaners; shoe polishes; synthetic detergents; bleach; laundry soil and stain removers; spot removers dry cleaning fluids; solvents; lye or caustic soda; household pesticides; photo chemicals; printing ink; paints; varnishes; stains; dyes; wood; preservatives (creosote); paint and varnish removers and deglossers; paint brush cleaners; floor and furniture strippers <i>Mechanical repair and other maintenance products:</i> Automotive wastes; waste oils; diesel fuel; kerosene; heating oil; grease; degreasers for driveways; asphalt and roofing tar; tar	

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

Source	Contaminants	Level of Risk
Landfills/dumps	Leachate; organic and inorganic chemical contaminants; waste from households and businesses; nitrates; oil; metals; solvents sludge	4
Motor pools	Automotive wastes; solvents; waste oils; hydrocarbons from storage tanks	2
Parks	Fertilizers; herbicides; insecticides; can bacteria; viruses; protozoa; TDS	2
Grazing animals, other animals and operations	Livestock sewage wastes; nitrates; phosphates; coliform and non-coliform bacteria; protozoa; viruses; TDS	3 (>5 animals/acre)
		2 (<5 animals/acre)
Dairies	Livestock sewage wastes; nitrates; TDS; salts; phosphates; potassium	2
Farm chemical distributor/application services	Pesticides; fertilisers; hydrocarbons from motor vehicles and storage tanks	3
Farm machinery repair	Automotive wastes; welding wastes	3
Irrigated crops	Pesticides; fertilizers; nitrates; phosphates; potassium)can be worsened due to over-watering)	2

Lagoons	Nitrates; livestock; sewage waters; salts; pesticides; fertilizers; bacteria	3
Non-irrigated crops	Pesticides; fertilizers; nitrates; phosphates; potassium	1
Pesticide/fertilizer/petroleum storages and transfer areas	Pesticides; fertilizers; nitrates; petroleum residues	3
Rural homesteads	<i>Machine shops:</i> Automotive wastes; welding wastes; solvents; metals; lubricants sludges <i>Septic systems:</i> Septage; coliform and non-coliform bacteria; viruses; nitrates; heavy metals; synthetic detergents; cooking and motor oils; bleach; pesticides; paints; paint thinners; photographic chemicals; swimming pools chemicals; septic tank/cesspool cleaners chemicals; elevated levels of chloride, sulphate, calcium, magnesium, potassium and phosphate	2
Sludge application to land	Organic and inorganic chemicals; coliform and non-coliform bacteria; viruses; protozoa	2
Agricultural drainage	Pesticides; fertilizers; TDS; TOC; nitrates	2
<i>Residential/Municipal</i>		
<i>Airports (maintenance/fuelling areas)</i>	Jet fuels; deicers; diesel fuel; chlorinated solvents; automotive wastes; heating oil; building wastes	4
Apartments and condominiums	Swimming pool chemicals; pesticides for lawn and garden maintenance and insect/rodent control; wastes from on-site sewage treatment plants; household hazardous wastes	1
Campgrounds/RV parks	Septage; gasoline; diesel fuel from boats	1

TECHNICAL ANNEXURE 6: METHODOLOGY AND DEFINITIONS FOR HUMAN SETTLEMENTS

Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
BNG/RDP Housing	BNG houses are developed with 100% of the cost covered by National grant funding (HSDG and USDG). Their built form is informed by National Housing Code.	R0 - R3 500	40m ²	R0 - R116 700	40	55 000	Freestanding; semi detached
Site and Service	Provides households with a plot of land and access to basic, essential services (water, sanitation, electricity, etc.). Funding by USDG. Built incrementally, thus no standardised built form.	R0 - R3 500	No standard built form.	R0 - R116 700	40	55 000	Free standing
		R3 501 - R7 000 (cannot apply for consolidation subsidy)		R116 700 - R250 000	80	180 000	Free standing

Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
Institutional Housing	This is a rent-to-buy approach which is developed through COCT's housing partners. Utilises both government subsidy and a loan from Cape Town Community Housing Company.	R1 501 - R7 000	No standard built form.	R84 000 - R240 000 (+R110 947 capital subsidy)	45	300 000	2 - 3 storey walk ups; free standing; semi detached
Social Housing	The programme utilises institutional and capital subsidies in terms of national housing programmes. Delivery occurs through Social Housing Institutions which develop and manage projects on the City's behalf.	R1 500 - R3 500 (30% - 70% of household allocation)	No standard built form.	Rental Units - does not apply	36		2 - 3 storey walk ups
		R3 501 - R15 000			36		2 - 3 storey walk ups

Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
GAP Housing	Capital subsidy provision for those who earn too much to qualify for a free house from the state, and who earn too little to qualify for a bond. No built environment specifications or restrictions	R3 501 - R22 000	No standard built form.	R233 400 - R483 500	58	290 000	2 - 3 storey walk ups; free standing; semi detached
Inclusionary Housing	Aimed at the inclusion of residents within the gap market through affordable units in new developments. Costs covered by developers or through FLISP subsidy. Yet to be legislated.	R3 501 - R18 000	No standard built form.	Rental Units - does not apply	N/A		

Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
Community Residential Units (CRU)	This housing programme is also aimed at households who earn less than R3,500 per month. CRU housing units are for rent and not for sale. This project is aimed at refurbishing inner city buildings and hostels.	R800 - R3 500	No standard built form.	Rental Units - does not apply			
Temporary Relocation Area (TRA) Housing	Sites developed in terms of the Emergency Housing Programme with access to shared basic municipal services. Costs are covered by HSDG for top structures and USDG for services.	N/A	9m ²	N/A	N/A		

Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
Incremental Development Area (IDA) Housing	Seeks to install basic services and secure a site for future implementation of top structures. Focus on speed of delivery, with funding through USDG.	N/A	No standard built form.	N/A	N/A		

Other Subsidy Instruments							
Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
Integrated Residential Development Programme	Provides for the acquisition of land, servicing of residential stands for low, middle and high income groups. The land use and income group mix will be based on local planning and needs assessment.	R0 - R3 500 (able-bodied persons)	40m ²	R160 573 (subsidy amount)			
		R0 - R3 500 (disabled persons)	40m ²	R160 573 (subsidy amount) plus disability variance			
		R3 501 - R7 000		N/A			
Informal Settlement Upgrading	This Programme is aimed at the in situ upgrading of informal settlements through the financing of serviced stands. Beneficiaries	R0 - R3 500	40m ²	N/A			

	may then apply for housing construction assistance through the other National Housing Programmes						
Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
Individual Subsidy Programme (FLISP)	This provides access to state assistance where qualifying households wish to acquire an existing house or a vacant serviced residential stand, linked to a house construction contract through an approved mortgage loan.	R3 501 - R22 000	No standard built form.	R27 960 – R121 626 (subsidy amount)			

Type	Description	Household Income	Size	Loan Affordability (9%)	Reasonable Estimate: Average Dwelling Unit Size (m ²)	Reasonable Estimate: Average Unit Price	Probable typology in Cape Town
Consolidation Subsidy Programme	Provides for the completion of houses on the serviced sites. The developer being a municipality or a provincial department is responsible for the implementation of the consolidation project with the full participation of the beneficiaries.	R0 - R3 500		R109 947 (subsidy amount)			
Enhanced Extended Discount Benefit Scheme (EEDBS)	Focused on the transfer of pre-1994 housing stock and is intended to stimulate and facilitate the transfer of public housing stock to qualifying occupants.	N/A	No standard built form.	N/A			

6.1. New Housing Opportunities

In this district, whilst there are not numerous substantial tracts of undeveloped land suited to urban development, a number of opportunities are identified. These include sites which may be part of new subsidised housing projects on the 5-year housing plan, as well as sites that should be further investigated for publicly assisted housing projects. The table below effectively gives guidance to locating suitable land for urban development.

Table 4: Criteria to be used to guide the identification of land for subsidised and gap housing

Principle	Subcomponents
Contain urban sprawl and protect the urban edge	The land identified should: • contribute to the development of a more compact city; • maximise the use of existing infrastructure and service capacity; and • not be located adjacent to the urban edge (where possible).
Facilitate urban integration, and promote the establishment of viable communities	The land identified should: • be in close proximity to existing economic, social and public transport opportunities; and • support a mutually beneficial mix of social, residential, recreational, commercial and employment opportunities.
Facilitate a range of housing options and delivery approaches	The land identified should: • be suited to the development of new settlements, the upgrade and de-densification of existing informal settlements, high-density housing, rental accommodation, and the release of land to the homeless; and • note that the size of the housing project, and type of delivery agent influence its economic viability.
Be suited to Housing development	The identified land should: • encourage environmentally sustainable land development practices and processes; • not lead to the loss/have a damaging impact on natural and built assets that merit longer-term protection; and • ensure healthy, safe living conditions.
Take the beneficiaries' economic and	• When identifying land, and providing infrastructure and shelter for the un-housed and poorly housed, it is

Principle	Subcomponents
social wellbeing into account	important to take their livelihood strategies and social support networks into account.

6.2. Informal Settlement (In-Situ) Development and Upgrading

One of the key issues facing informal settlement upgrade is the issue of which settlements should be regarded as permanent, thus becoming the focus of upgrading beyond access to basic services (e.g. in situ upgrading) and which settlements or areas within settlements should be considered temporary and suited to relocation. In this regard, the City of Cape Town's Informal Settlements Department has initiated a process of 'categorisation of informal settlements' in terms of three types of settlement in order to inform the nature of intervention for each settlement (or portions thereof), including:

- **A** – occupation is permitted.
- **B** – occupation is only temporarily allowed because it is either demonstrably to the disadvantage of existing rights holders or it is very difficult or costly for services to be supplied.
- **C** – occupation is prohibited because it is hazardous to the residents or the wider community.

Informal settlement upgrading is identified by the National Department of Human Settlements as a key area of focus for human settlement development. The objective is to make these areas habitable and conducive to raising families. This means prioritising the provision of basic infrastructure, services and land tenure for informal settlement households.

The National Upgrading Support Programme (NUSP) provides technical support to municipalities for the development and implementation of upgrading programmes and plans (e.g. Upgrading of Informal Settlements Programme (UISP)). Capacity building and training of practitioners and community members was minimal but was a key part of the NUSP programme.

In assessing the feasibility of upgrading, many contributions from several organisations are required in terms of information, technical, human and financial resources. The support/upgrading is categorised in the following ways: The categorisation is proposed on the basis of a number of circumstances/features and each has associated proposals regarding possible intervention in light of those circumstances, as indicated in the table below.

Table 5: Criteria for categorisation of informal settlements upgrade/support

Category	Description	Intervention
A:	<i>Imminent Full Upgrading (Rapid Formalisation, full services)</i>	Formalisation consisting of full services, state-funded housing, formal tenure (e .g. title deeds), township establishment. May be conventional 'RDP' or densified housing solution
B1:	<i>Interim basic services (Provision of interim services leading to eventual formalisation)</i>	Commencing with comprehensive essential services package (e .g . water, sanitation, roads & footpaths, electricity, fire protection, waste removal key social facilities). Incremental tenure. People build own housing in the short term. May lead to formalisation or other permanent settlement solution
B2:	<i>Emergency basic services (Provision of emergency basic services BUT leading to eventual relocation)</i>	Commencing with emergency services package (e.g . water, sanitation, fire protection, solid waste removal). Eventual relocation
C:	<i>Rapid relocation to a site which is already available or imminently available</i>	Rapid relocation to a prepared site [i.e. greenfields housing project, temporary relocation area (TRA), site and service (serviced land release)]

TECHNICAL ANNEXURE 7: METHODOLOGY FOR TRANSPORT ROUTE DESIGNATIONS

7.1. The Categorization of Transport Infrastructure in the District Spatial Development Frameworks: An Outline Method

7.1.1. Understanding Accessibility and Land Use in the City

The relationship between land use and accessibility is a fundamental informant to urban development. Higher levels of urban intensity and density generally support higher levels of urban opportunities, and also urban efficiencies. In turn, areas of highest accessibility to urban opportunities should be those of highest urban intensity and density.

Transport infrastructure is key to supporting accessibility to opportunities, but also dependent on sufficient development thresholds for efficiency, and is therefore central to the relationship between land use and accessibility.

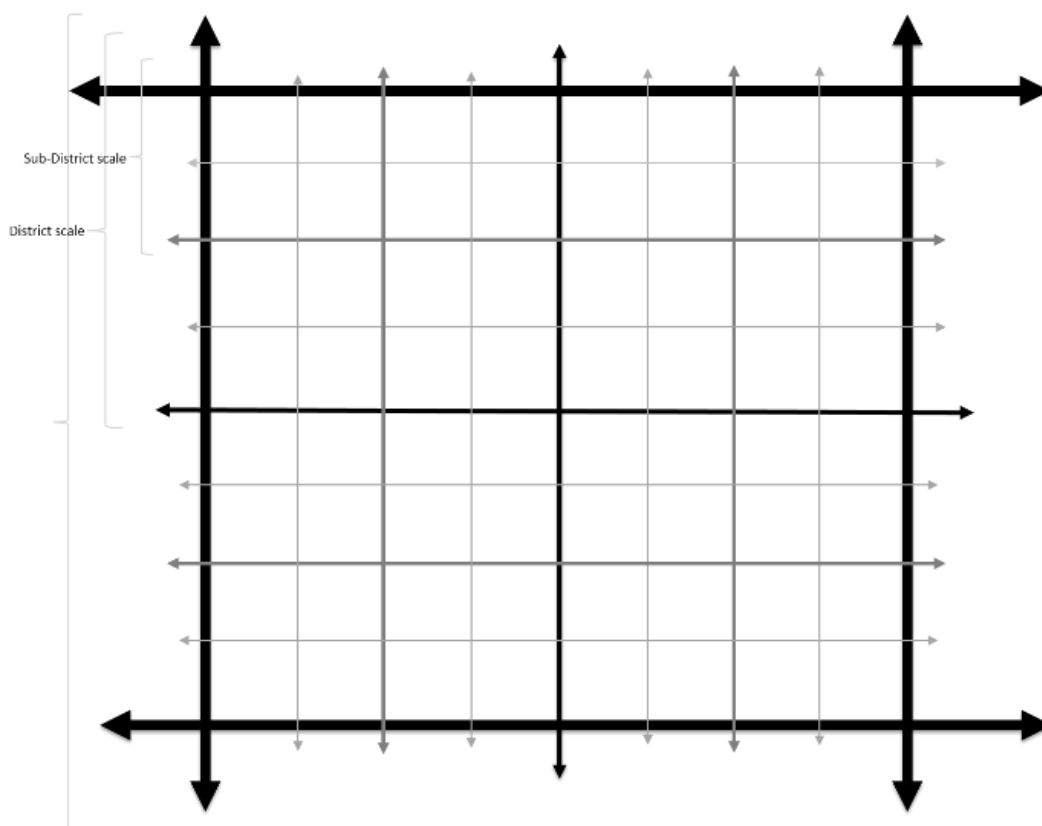


Figure 3: The Basic Accessibility Grid

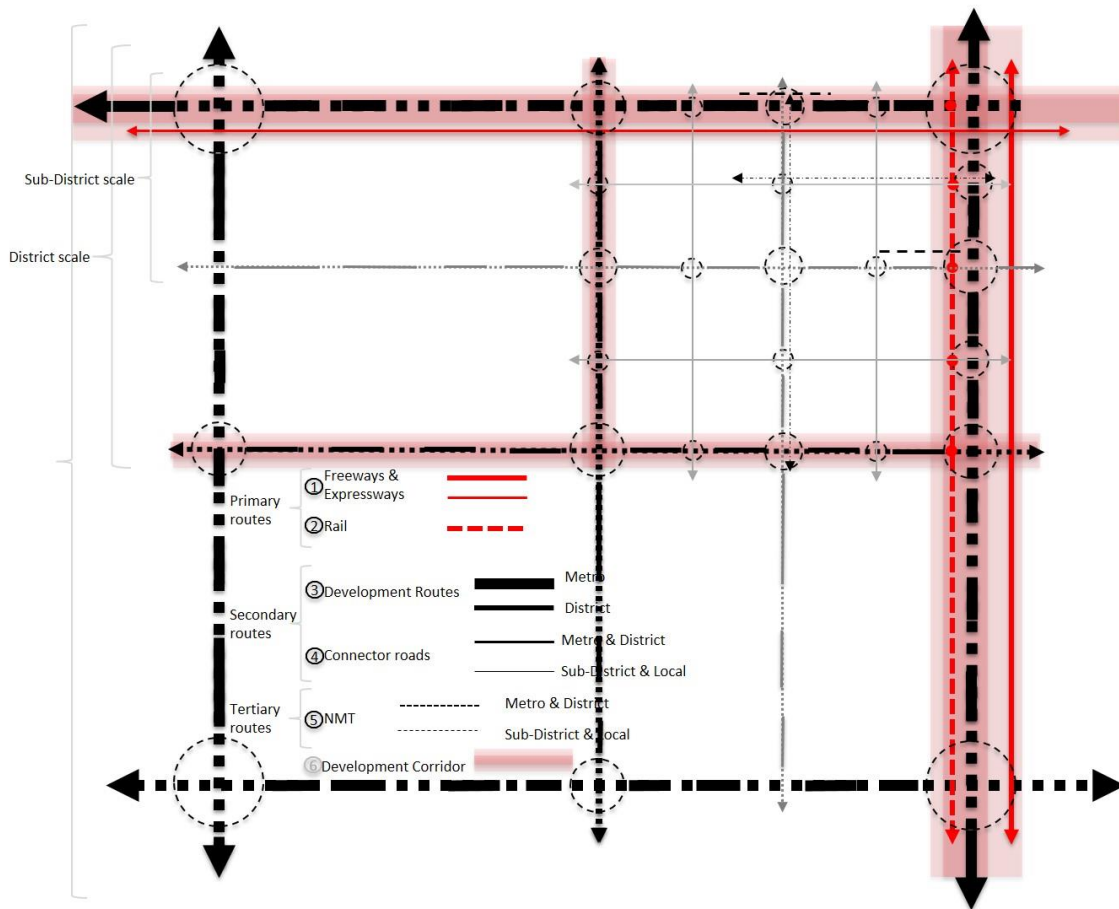


Figure 4: The comprehensive City Accessibility

The mix of mobility and accessibility infrastructure based on:

- Non-motorised transport (NMT) within and between neighbourhoods.
- High frequency and volume public-transport-orientated mobility along development routes and railways, made cost-effective by high intensity development thresholds,
- Higher mobility connectors linking more peripheral urban areas and nodes, and
- High mobility freeways linking from within the district to other parts of the city and neighbouring towns and regions.

The key objectives of an optimal movement system should be:

- Optimising the relationship between movement and development.
- Making a more 'walkable city'.
- Ensuring all roads, excepting freeways, are as much for people as they are for vehicles (re- movement and safety).
- Reducing average household transport costs.
- Reducing the city's overall carbon footprint.
- Optimising development and movement opportunities.

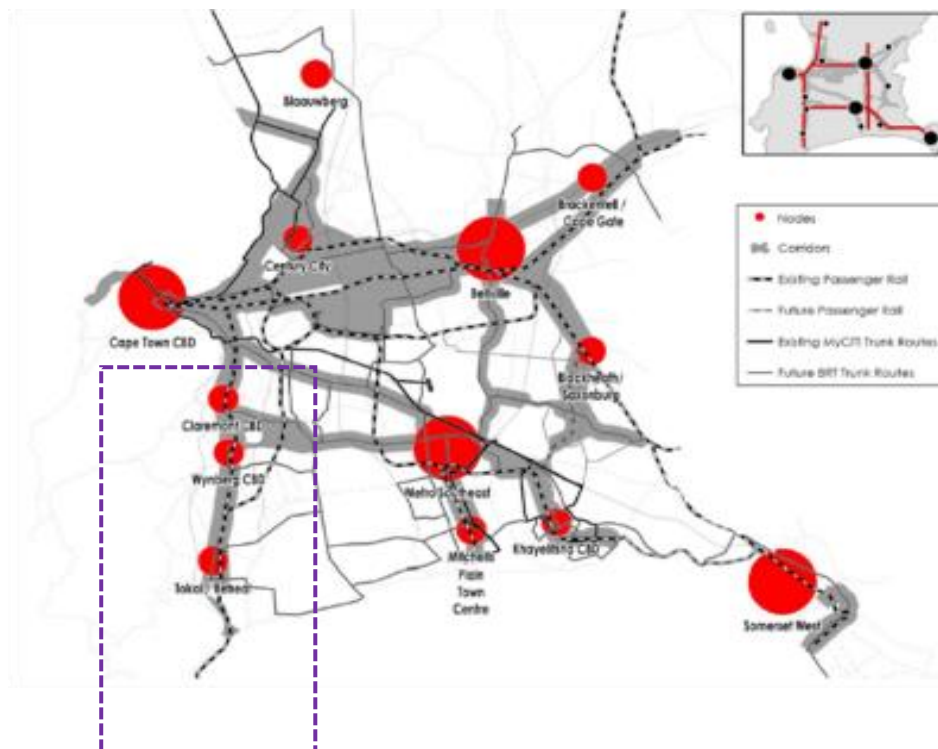


Figure 5: Cape Town's Accessibility Grid (as per CTMSDF, 2018)

7.1.2. The District SDF Route Categorisation: The Rationale

The following broad route categorisation hierarchy is drawn from the CTMSDF (2018), but interpreted in terms of applicability and appropriateness for the reviewed district level Spatial Development Frameworks.

- A. Primary Routes (although arguably Secondary routes associated with the supporting Secondary Accessibility Grid):
1. **Freeways (inclusive of Expressways):** Urban freeways fulfill an exclusive mobility function, and do not permit direct access to abutting land uses. The high connectivity provided by direct freeway/expressway connections tends to attract manufacturing, warehousing, major retail and industrial land uses. These opportunities tend to be realised around key intersections/off ramps and on roads running parallel or linked to urban freeways.
 2. **Rail:** Rail provides (should provide) a high-performance, high-volume and safe public transport service, which will be the preferred mode of choice of long-distance commuters. Conceptually, this service should be provided at 8-16km intervals on a city wide to district level - forming part of the *Primary* tier of the accessibility grid

The rail network provides for mobility over longer trip distances. The hierarchy of stations supporting the rail service are primary points of accessibility, particularly when associated with areas of high road based accessibility, and can generally support intense concentrations of activity and medium – high land use densities.

- B. Secondary Routes (although arguably Primary routes associated with the Primary Accessibility Grid):

3. **Development Routes:** These are characterised by development immediately adjacent to 'main' roads which is medium to high intensity mixed use through urban nodes and medium to high density residential in-between these urban nodes. Associated with this higher intensity / density development is high frequency public transport provision. These roads are also generally characterised by direct access and interrupted movement flows, especially at bus and taxi stops, traffic lights, and in CBD areas where development, pedestrian and vehicle intensity is high and the need for access across roads is high.

These are differentiated by higher order (or metro-scale) and lower order (district-scale) routes:

- Higher order (metro-scale) development routes are associated with higher development intensities and densities on properties abutting (or very close to) primary main roads with high frequency and volume public transport (generally associated with IRT trunk routes – including rail). These routes link metro-significant (or major district) urban node (urban opportunity) areas.
- Lower order (district-scale) development routes are associated with lower development intensities and densities abutting (or very close to) lesser main roads with high frequency but lower volume public transport (generally associated with IRT feeder / bus or taxi routes). These routes generally link district significant urban nodes into metro-significant urban nodes and development routes and corridors.

4. **Connector Routes:** The primary role of these roads is to connect outlying urban nodes and surrounding areas in the district to major opportunity areas (i.e. major urban nodes and development corridors). They have a greater mobility function than development corridor main roads. They generally accommodate differing accessibility and mobility functions along their route, but their role in accommodating high accessibility is generally focused at nodal areas (or in more outlying areas 'villages'). Direct access to abutting land uses and residential properties is not otherwise encouraged along connector routes, but is provided for existing properties abutting these roads that have no other access option. These are primarily private and freight movement routes, and includes most scenic routes (as they link through mountains, along the coast etc.). Although not generally primary public transport routes, they may include public transport, particularly in outlying areas where there are no development corridor main roads.

These are differentiated by higher order (or metro-scale) and lower order (district-scale) routes:

- Higher order (metro-scale) connector routes are generally principal (usually longer) roads connecting many places across the district and into other districts. They are generally associated with comparatively high volumes of faster-moving traffic (although this may vary considerably across a variety of different road types in different areas) connecting dispersed (often remote) areas of urban concentration / intensity (i.e. urban nodes) along the route. These are usually associated with some (although) limited public transport.

- Lower order (district-scale) connector routes are generally less significant (usually shorter) roads connecting (usually fewer) places within the district. Although often also associated with comparatively high volumes of traffic this is usually at lower speeds and giving access to local neighborhoods', although this too may vary considerably across a variety of different road types in different areas. These may also include some (although) limited public transport.

C. Tertiary Routes:

5. **NMT:** This comprises a range of non-motorized routes of varying function, nature, and significance. This includes all road verges and pavements (excepting along freeways, expressways and railways), paths and trails through open space and nature areas, and major destination place promenades within the district. However, this should generally be prioritized along public transport routes and around public transport stops, stations and interchanges to facilitate safe and convenient access to public transport services, forming a connected network – and effectively comprising the 'tertiary tier' of the accessibility grid. Walkability, and non-motorized bikes (excepting small cc electric) should be an increasingly key focus of the manner in which development and movement is planned and occurs in the district.

D. Quaternary Infrastructure:

6. **Broadband Fibre:** This should be provided (as part of transport infrastructure) within development corridors (as defined by area / extent) as priority areas as a strong informant to reducing the need for transport (movement of people) and supporting /increasing economic opportunity in all prioritised urban development areas of the city / district.

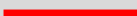
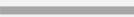
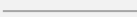
E. Development Corridors:

7. **Development corridors** are wide areas of (where) higher-intensity urban development (is focussed) on either side of development routes (than in surrounding urban areas further away from these routes). They are characterised by a dynamic, mutually supporting relationship between land use and the movement system. Development corridors are generally supported by a hierarchy of transport services that function as an integrated system to facilitate ease of movement for private and public transport users. Corridor development is focused predominantly on routes serviced by mass rapid public transport services (i.e. rail or bus rapid transport (BRT) trunks). However, the routes may serve different functions, with some routes combining route functionality in terms of accessibility and mobility. The concentration of intense bands of high-intensity urban development reduces overall trip lengths and improves access to opportunities, offering a means of conveniently integrating communities with service provision, and fulfilling a range of economic and social needs.
These are, aligned with the differentiation of development routes, differentiated by higher order (or metro-scale) and lower order (district-scale) development corridors:

- Higher order (metro-scale) development corridors are associated with higher order development routes (i.e. with higher development intensities and densities, and high frequency and volume public transport), but also wider urban areas of primarily higher density residential development which usually include within (or close to) them other complementary and supporting movement routes (e.g. rail, connector routes, and/or freeways).
- Lower order (district-scale) development corridors are associated with lower order development routes (i.e. with lower development intensities and densities, and high frequency but lower volume public transport), but fairly narrow urban areas of usually exclusively medium density residential development (on either side of the development route) which are not associated with any additional complementary and supporting movement routes.

The above can be summarised as follows:

Table 6: Transport designations and symbology

	SDF Route Categories & Designations	Sub-categories	Indicated on District map	Indicated on Sub-District maps only
A	Primary routes			
1	Freeways (& Expressways)	Freeways		
2	Rail (& stations)			
B	Secondary routes			
3	Development Routes	High order (metro scale)		
		Low order (district scale)		
4	Connector Routes	High and low order (metro & district scale)		
		Sub-district & local scale		
C	Tertiary routes			
5	NMT	Metro & district-scale		
		Sub-district & local scale		
D	Quaternary	<i>IT/WiFi cabling</i>		
E	Development corridors	High order (metro scale)		
		Low order (district scale)		

Transport infrastructure is reflected indicating selected elements of the district-wide movement system. In alignment with the CTMSDF, the District Spatial Development Frameworks (SDFs) utilise a route designation indicating land use functionality that will encourage an appropriate level of development and more intense land uses to locate on, or adjacent to, the (primary) accessibility grid. This will contribute towards establishing the thresholds required for sustainable and cost effective public transport. It is important to note that opportunities along routes can also be linked to parallel streets and side roads. Furthermore, routes exhibit different characters with respect to land use mix and density along their length. District development guidelines should thus be read along with sub-district guidelines and local plans and policies where applicable and not necessarily be interpreted in a blanket manner for the length of the route.

The route designation reflected does not replace the City's Hierarchical Road Network Classification system, nor is it intended to run in parallel as a duplicate classification system. Annexure A (still to be agreed on for inclusion) describes the relationship between the CTMSDF / district SDF route designations and DoT, the PSDF and the City's hierarchical road classification network.

7.1.3 Notes Regarding the District SDF Route Map Designations

Importantly, the following applies in the designations as mapped. This is to minimise the complexity of maps, as well as unnecessary duplication (of information already provided elsewhere).

1. The District SDF (as does the CTMSDF) utilises a transport route designation relating to desired land use functionality. No distinction is therefore made between existing and emerging routes in the main district SDF and sub-district maps. This distinction is made and provided in the implementation section of the SDF which identifies future planning and development priorities, and is indicated on an Urban Restructuring map.
2. Road based public transport services and routes (eg. BRT trunk and feeder routes and taxis) are not designated on the SDF maps*. However, public transport, and its frequency and capacity, should align closely with development routes (and the associated development corridors) as well as other important routes (eg. main connectors).
 - * Public transport routes are mapped in the Integrated Public Transport Network Plan (IPTN).
3. The distinction between Metro and District Development Routes on the maps is made by the extent of the associated designated development corridor widths (800m development corridor widths for Metro development routes and 400m for District development routes).
4. The width of District Development Corridors is designated only on the SDF sub-district maps.
5. Scenic routes are indicated separately (only) on the SDF sub-district maps. All scenic routes (with one or two notable exceptions: e.g. the M5 'blue route') are connector routes.

TECHNICAL ANNEXURE 8: METHODOLOGY TOWARDS DESIGNATION OF NODAL HIERARCHY AND TYPOLOGIES

8.1. Methodology Towards Designation Of Nodal Hierarchy And Typologies In The District SDF

8.1.1. Introduction

The purpose of this document is to provide guidelines on the methodology to be followed for nodal designations in the District SDF review process. Nodes are categorised based on scale, function and the role it plays in the local, district and wider metropolitan context.

8.1.2. Definition of a node

Nodes can be defined as a **clustering of higher intensity** (i.e. diversity and density) land uses that are located and **concentrated** at points of maximum accessibility (either through public and/or private transport), exposure, convenience and opportunity. The role and function that a node fulfils in terms of its local/district/metropolitan context would determine the designation in terms of its hierarchy/scale.

Emerging nodes would refer to the above definition of concentration points that are still in the process of being developed. Development guidelines should support the growth of such nodes.

The principle of clustering of civic facilities underpins the nodal approach and creates opportunities for facility multi-use and sharing and that should result in land savings and trip reduction and other efficiencies. These nodal/clustered areas where such facilities are grouped/clustered and serve the people living in the service catchment area it would be classified as a **civic cluster** in the District Plan.

8.1.3. Background

During the past 5 years various pieces of existing work around the categorization and classification of nodes have either been undertaken and/or reviewed. The section below will highlight existing work that has been used as the basis moving forward with the categorization and demarcation of nodal areas to be incorporated into the District Plan review process.

8.2. Spatial Development Framework

8.2.1. Municipal Spatial Development Framework

The 2018 MSDF have categorized various nodes at different scales, as stated below:

Metropolitan and sub-metropolitan nodes

- Aim is to focus concentrated intensification at points of very high/ high accessibility, exposure, convenience and urban opportunity (typically along your accessibility and activity routes)
- Support and encourage a very high/ high intensity, mix and clustering of urban activities or land uses (wider variety of land uses and higher densities). Serves a broad spectrum of citizens and businesses

District and local nodes

- Aim is to focus concentrated intensification at points of high accessibility, exposure, convenience and urban opportunity
- Support and encourage medium to high intensity, mix and clustering of urban activities or land uses.
- Service area more geared towards the communities within the district as well as much more localised services within walking distance from citizens using the services.

8.2.2. District Plan 2012

The 2012 DP identified various “nodal” type classifications. These included different scales of urban nodes (metropolitan, sub-metropolitan, district, local & neighbourhood), transit station typologies (metropolitan, major urban, employment, urban neighbourhood, neighbourhood & coastal), civic precincts and destination places. All of these had a certain level of clustering of different land uses at different scales. The extracts below indicate how these “nodal” typologies were categorized as well as the definitions linked thereto.

a) Urban nodes

Urban nodes are characterised by the intensity, mix and clustering of activities or land uses (including commercial/ business development and associated employment opportunities, higher-order services and higher residential densities) at points of maximum accessibility, exposure, convenience and urban opportunity. The generative capacity of an urban node is generally a function of the mix of land uses that it supports and its position in the accessibility grid (see Table 3.1). The role and function of urban nodes is differentiated in terms of scale (metropolitan, sub-metropolitan, district, local) based upon its structural position within the accessibility grid, and the intensity and mix of land uses it supports. Urban nodes are identified as areas for further land use intensification,

clustering and reinforcing economic land uses, public services and high-density residential development.

Table 7: Alignment and hierarchy of the accessibility grid and areas of intensification

Accessibilty grid	Span	Associated nodal development	Scale of operation	Areas of land use intensification
Primary	8 – 16 km	Metropolitan node	Citywide	Corridor/strip development/urban nodes
Primary	4 – 8 km	Sub-metropolitan node	Sub-metropolitan	Corridor/strip development/urban nodes
Secondary	2 – 4 km	District node	Inter-district significance	Strip development/urban nodes
Tertiary	1 – 2 km	Local nodes	Inter suburb	Usually urban nodes
Quaternary	0,5 – 1 km	Neighbourhood centre	Suburb	Usually nodal

Other forms of intensification of development, on the accessibility grid (development routes, activity routes and streets) could be encouraged in a locally appropriate manner including:

- **Industrial areas** where the changing of their nature is supported by the District plan;
- Particular **business complexes** that are on the accessibility grid (development and activity routes / streets);

Areas associated with **transit stations (system of rail stations and the IRT trunk stations)** especially those, which are a component of identified urban nodes. With regard to these areas, a typology of opportunities is proposed which considers the transport and land use role of the transit stations (rail and IRT trunk stations) and associated areas (comfortable walking distance from the station) in the broader urban system (see table below). Transit station areas that are associated with urban nodes as well as associated significant foot movement (based on their role in the transit system) are generally more likely to support more intense mixed use environments.

b) Transit station area

Refers to the areas that support transit (public transport) stations (including rail stations and trunk, road based IRT stations). These supportive areas are conceptually defined in the District Plan, but are generally within comfortable walking distance of these stations (i.e. +/- 800m). Transit stations are categorised in the District Plan (e.g. neighbourhood station / urban station), which provides an informant to potential development opportunities / desired land use mix in the supportive areas and which should be further defined and detailed at the local area level.

Table 8: Transit (Rail and IRT trunk) station precinct typology

Transit station area typology	Land use character / role	Intermodal connectivity	Structural urban position	Example station
Metropolitan station	High intensity land use mix (office, residential, commercial, civic and government)	Major intermodal connectivity and destinations	Generally associated with metropolitan urban node	Cape Town station
Major urban station	Mix of office, retail, residential, commercial and public uses	Major intermodal connectivity	Generally associated with sub-metropolitan/ district urban node	Wynberg station
Employment station	Specific industrial/ commercial uses and destination	Limited intermodal connectivity	Generally associated with general industrial area	Blackheath station
Urban neighbourhood station	Local centre of activity, live, work, shop	Transit feeder station with parking	Generally associated with local urban node	Rondebosch station
Neighbourhood station	Primarily residential function	Local transit feeder station with limited parking	Likely to reflect embedded position in urban fabric	Hartfield station
Coastal station	Coastal amenity with surrounding residential/ tourism/ restaurant orientation	Limited intermodal connectivity	Generally outlying areas with minor urban catchments	St James station

c) Civic precincts

Social facilities and public institutions should be clustered in civic precincts, at the points of highest accessibility (the intersections of the grid). The hierarchy of the civic precincts will be determined by the hierarchy of the accessibility grid. The civic precincts that are of citywide significance will by and large be located at the intersection of the primary grid, such as Bellville. The civic precinct will be the focus of public investment, and will create opportunity for private-sector investment in commercial, mixed-use and higher-density residential development. They will therefore be closely associated with urban nodes.

d) Destination places

A destination place is a node, landmark or location that forms a significant point or area of attraction, and is part of the identity of Cape Town and the district. High-order destinations are those that every resident and visitor should visit at least once, while, at a local level, destinations include public spaces, such as squares, parks and sports facilities.

e) Community facilities

Community Services & Health Infrastructure Plan (CSHIP)

The CSHIP is an infrastructure and investment plan that focus on the best use of limited resources. The plan guides high-level decision making in terms of the provision and optimization of social infrastructure as well as a multi-year budget linked to this implementation. The plan is informed by a detailed assessment of existing facilities and services provided in order to identify the gaps that need to be addressed. Furthermore, a consistent and clear set of criteria has been utilized to identify, profile and prioritise precincts and clusters of facilities. Precincts have been ranked based on highest level of priority from a Community Services & Health perspective, the highest priorities from the perspective of City strategic alignment, as well as the highest ranked precinct in terms of the combined/overall. This provides a clear indication of which specific facilities are required and specifics on how they are aligned to City strategy. There are twenty-four precincts in total and although there are precincts priorities in all areas, the Central (8) and East(6) Areas have the highest number of precincts identified.

Table 9: Community services and health precincts per area

	Area 1: North	Area 2: East	Area 3: Central	Area 4: South
Backlog	Atlantis (19) Du Noon (15) Hout Bay (13) Wallacedene (4)	Enkanini (8) Khayelitsha Site B (11) Khayelitsha Site C (2) Mfuleni (5) Nomzamo (11)	Manenberg (18) Nyanga/Gugulethu (6) Hannover Park (14) Elsies river/ Bishop Lavis (10) Delft (7) Blue Downs (3) Belhar (12)	Phillippi (9) Seawinds (16) Pelican Park (17)
Optimisation		Khayelitsha CBD	Bellville	Mitchells Plain Town TC Claremont CBD Wynberg CB

8.3. Facilities 2040 Research and Modelling (Conducted Through CSIR)

To provide an effective distribution network for a range of social facilities and services it is important that facilities are clustered at accessible locations. Facilities have a range of threshold levels, which increase with their level of specialisation. For example, facilities frequented on a daily basis have a lower threshold than those used less frequently. Simply put, this means that the more specialised a service or facility is, the fewer of those there may be and the longer people should expect to travel to access that service. Ideally, the hierarchical nature of social service delivery should relate to a hierarchy of social facility delivery centres.

Establishing such a hierarchy assists in allocating facilities of various types to their most appropriate locations based on the required access distances, facility threshold and the appropriate number of people required for service efficiency within the service catchment area of that facility. To operate viably, facilities with large thresholds, such as stadia, require a larger number of people within their service catchment area or reach than, for example, a library or, even at a lower level, a primary school.

The Community Services and Health Directorate developed a node based approach to identify social facility civic clusters in order to drive the precinct planning strategic approach and guide City investment.

For the purposes of community services, a node/civic cluster is defined as an area of clustered services that are referred to as civic clusters. The section below highlights the methodology and approach that was used to identify the hierarchy of nodes.

- Approach followed is NSDF Town hierarchy and its service wheel – adapt to align to City of Cape Town
- Propose a social facility distribution framework which would include:
 - Backlogs of facilities
 - 2040 population projections and estimated future facility needs
 - Quantify and identification of land (including optimisation)
 - Nodal hierarchy and spatial locations
 - Prioritised interventions per sector and node level
- Include the following services: Education, Primary health and Hospitals, Sport and recreation(municipal, open space and active recreation space), Libraries, Halls and multi-purpose centres, Government services(Labour, Justice, Social Services, Home Affairs, SASSA, SAPS), City service points(housing, environmental health, cash offices, etc.)

135 civic clusters were identified and ranked into five categories/levels (a cumulative and linked hierarchy of nodes). As illustrated in Figure 6 below based on the intensity of the differential role of each node in the city, service catchment population size, range & type of facilities available and an equitable spatial spread of civic clusters at different levels across the city that is required to support efficient and a spatially just distribution of different facility types at acceptable distances.

These nodes should be used to guide the location of new facilities in the City of Cape Town; both for addressing current requirements relative to the standards and for serving new areas of residential development

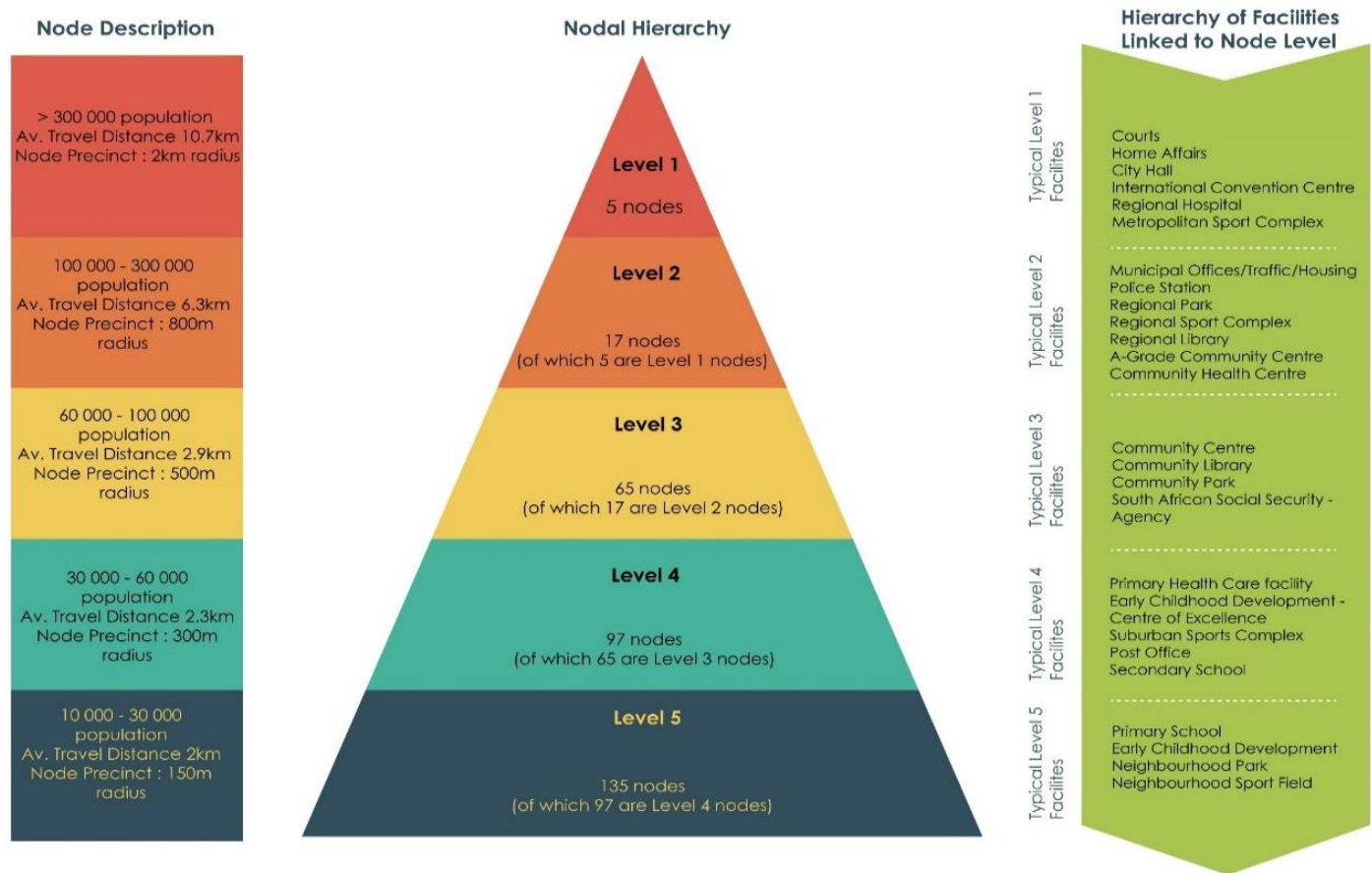


Figure 6: Facilities nodal description and hierarchy

Table 10: Community Services within nodal hierarchy

Scale	City wide (Regional)	Level 1 (Regional)	Level 2 (Regional)	Level 3 (Community)	Level 4 (Neighbourhood)	Level 5 (Neighbourhood)
Catchment		15 – 25km	10 – 15km	5 - 10km	2 – 5km	0.1 – 2km
Population		>300 000	100 000 – 300 000	70 000 – 90 000	30 000 – 60 000	10 000 – 30 000
Cluster radius		2km	800m	500m	300m	150m
Services	✓ City Hall ✓ International sports venue ✓ International conference centre ✓ High court ✓ City headquarters ✓ Tertiary hospital(L3) ✓ Prov & Nat Gvmnt offices (Head offices) ✓ University ✓ Reference Library	✓ Major public venue ✓ Grade A community hall ✓ Regional hospital(L2) ✓ Regional library ✓ Sub-metro/ Regional sport complex/Stadia ✓ Regional Park ✓ Municipal offices ✓ Traffic Dept. ✓ Home Affairs/Other gvmnt inst. Reg Office	OPTIONAL for larger L2 nodes <350 000 people; selected L1 services to be provided ✓ Tertiary institution (not university)i.e. EFT ✓ Fire station ✓ District sport complex ✓ Civic centre/Community Hall ✓ SASSA office ✓ District hospital(L1) ✓ Municipal billing points ✓ Env Health offices ✓ Regional library	✓ Community Hall ✓ Local library ✓ Community Hall/CDC ✓ Home for the aged ✓ Sports complex – district ✓ District Park ✓ Children's home ✓ Police station	✓ ECD – centre of excellence hubs ✓ Primary health clinic ✓ Post office ✓ Suburban sports complex ✓ Secondary school ✓ Community Park	✓ ECD – Local crèche ✓ Neighbourhood sport field ✓ Neighbourhood Park ✓ Primary school

8.4. Transport

8.4.1. Transit Oriented Development

The Strategic Transit Oriented Development Framework have gone through detailed and iterative process, which identified a set of Transport Accessible Precincts (TAPs). These are spatially defined zones used to measure the performance of the Transit Oriented Development Comprehensive model outputs (or in this context the 'individual'). The precincts are confined to a 500m radius from a higher order public transport station. They were identified based on their level of access to the transit network. The aim is for these TAPs to become the primary anchor for strategic intervention to ensure sustainable forms of development in close proximity to transit. Further to this the framework acknowledge that TOD has different meanings and requirements dependant on the intensity, scale and type of land uses that existing or is envisaged. Thus different interventions were proposed at different scales of planning.

Metropolitan

- ✓ The aim is to optimise travel patterns in such a way that it meets a set of predefined indicators
- ✓ Development of land produces and attracts trips with varying characteristics depending on the type and location of the land use.
- ✓ TOD at the metropolitan scale spatially distribute optimum land uses to ideal locations at the ideal time to optimise city wide travel patterns toward long term efficiency and sustainability.

Corridor

- ✓ Focus must be on land development to promote bi-directional flow of trips and the financial sustainability of trunk public transport services whilst playing a role in achieving the metro scale balancing mentioned above.
- ✓ Integrated transport and land use planning should give context to local area and precinct planning initiatives.
- ✓ Promote land development along selected transit corridors, where the combination of transport investment and development would optimise the utilisation of transport.

Nodal / Precinct / Projects

- ✓ TOD principles can be applied to facilitate better interfaces between the transport systems, land developments and people.
- ✓ Allocation of space should be done in a manner that would create more opportunities for walking and cycling and greater use of public spaces through using urban design to create a sense of place.

Station precinct typologies

The implementation of the framework included categorizing stations into a hierarchy, ranging from low to high development potential. This categorisation informed the classification of stations into two main typologies namely “Major TOD station precinct” and “TOD station precinct” with remaining being classified as station/stops.

Major TOD station precinct

A major TOD station precinct typically occurs in relation to a modal interchange characterised by high boarding/alighting passenger volumes due to the interchange with significant north/south routes or alternative public transport modes, and proximity to trip attracting land uses. In some instances, Left Only Boarding (LOB) facilities may be provided on the opposite side of the intersection and are linked with pedestrian crossings. The urban environment generally includes high levels of accessibility, a concentrated mix of non-residential land uses, high density existing/potential residential developments and significant development potential.

TOD station precinct

A TOD station precinct typically includes a closed median station with two platforms and high transfer/boarding/alighting passenger volumes. The surrounding urban environment offers some development potential; however, this is constrained by established existing development, limited vacant land and/or perceived lower property demand.

Public Transport Zones

PT zones have been approved as an overlay zone in the Dev Man Scheme. They have been divided into 2 zones namely PT1 and PT2. The demarcation of these went through a rigorous process of analysis and categorization of:

- ✓ availability of public transport or areas in which public transport improvements are promoted;
- ✓ existing operational quality of public transport (in terms of frequency and capacity);
- ✓ the level of service (quality) experienced at stations and at precinct level;
- ✓ and the socio-economic characteristics of the surrounding area.

‘PT1 areas’ refers to areas where the use of public transport is promoted, but where the City considers the **provision of public transport inadequate** or where the use of motor vehicles is limited.

‘PT2 areas’ refers to areas where the use of public transport is promoted and the City considers the **provision of public transport good**, or where the use of motor vehicles is very limited.

The intention is to offer reduced off-street parking requirements in areas already well-served by public transport, in order to encourage the reduction in the number of private

transport trips generated to and from that area, as well as to encourage the intensification of land development on the relevant erven. The data for the GABS, MBTs, and MyCiTi feeder routes was combined with the trunk services data (normalised, so that rail would not “overwhelm” the other data), to present a composite picture of public transport activity. It shows a strong correlation between the existing PT zones, and the composite PT activity.

It was noted that all of the zones are located in areas targeted for investment: 83% in the Urban Inner Core (of which 64% is located along corridors and in nodes identified in the MSDF), and 17% in the Consolidation Zone.

8.5. Summary of existing categories and typologies

The two tables below are summaries of the current guidelines which are found in the following documents:

- 2018 Municipal Spatial Development Framework
- 2012 District Spatial Plans
- 2040 facilities research and modelling (CSIR)

This information has been used to confirm the designations of different classification of nodes/precincts.

Table 11: Scale/ Hierarchy of Nodes

SCALE/HIERARCHY of NODES							
	CATCHMENT AREA		NODAL RADIUS			TRANSIT (DP)	
SOURCE	CSIR	DP	MSDF	CSIR	TOD	Category	Catchment (km)
METRO	15 – 25km	8- 16km	800m – 2km	1.5km		Metro station	8 – 16km
SUB-METRO		4-8km				Major Urban station	4 – 8km
DISTRICT	10-15km	2-4km		800m		Major Urban station	2 – 4km
LOCAL	5–10km	1-2km		500m	400m	Urban neighbour-hood station	1 – 2km
NEIGHBOUR-HOOD	<5km	<1km		300m		Feeder with limited parking	0.5– 1km

Table 12: Existing Typologies of Nodes/ Precinct Areas

EXISTING TYPOLOGIES OF NODES/PRECINCT AREAS	
TYPE	CHARACTERISTICS
MIXED USE	✓ Concentration of different residential and non-residential land uses ✓ Horizontal and / or vertical integration of uses ✓ Intensity and density of uses vary according to the location ✓ Around or in close proximity of highly accessible public transport facilities ✓ Characteristic for nodal and/or strip-development along high accessibility routes
INDUSTRIAL	✓ Pre-dominant land use is Industrial ✓ Small scale retail activities that support the industries ✓ Close proximity to public transport and high level of accessible (also known as an Employment station in 2012 DP)
CIVIC PRECINCT	✓ Clustering of social facilities on its own or in mixed land use context ✓ Scale, function and role of social facilities determine the level of the precinct ✓ Higher order facilities in close proximity of highly accessible public transport
DESTINATION PLACE including COASTAL NODES	✓ Landmark or location with significant level of attraction ✓ Unique identity (public places, squares, parks) ✓ Mostly linked to tourism and recreation ✓ Nature, heritage, Coastal and Cultural typologies ✓ Coastal areas will include nodal areas where development is encouraged ✓ Coastal amenity with surrounding res/tourism/hospitality)

The next section of the document will provide details pertaining to the informants to the designations as well as the proposed scales/hierarchies and typologies to be used in the reviewed District Plan.

8.6. Informants

Section 6.2 of the MSDF highlights the need for the confirmation of the designation and extent of district and local nodes. Taking cognizance of the fact that nodes can be located at various scales there are a few key informants that should be considered when identifying nodal areas.

8.6.1. Existing nodes

- Assess the existing nodes identified in the 2012 DP and 2018 MSDF in terms of the following criteria:
 - Is all information for the specific nodes still relevant?
 - Role and function of the node
 - Performance in terms of existing designation:
 - Medium – High performance: How to maintain/support??
 - Low performance: Required changes needed/function changed???
 - Confirm/amend the nodal designation
 - STA delineation – where City will invest (growth points)

8.6.2. Accessibility

- Focussed areas at highly accessible locations with multi-modal transport modes (around PTIs, existing rail stations) with potential for land use intensification; PT1 & PT2 zones where there are already incentives for parking provision.
- In close proximity to, along or adjacent to high accessibility and activity routes (walkability: approximately 800m – 1km).
- Future public investment(known) BRT, station upgrades and new/upgraded rail and existing facilities (GAB & taxi's)

8.6.3. Economic potential

- Existing mixed land use locations with potential for land use intensification
- Identified high accessibility areas(PTI/routes) with the potential for redevelopment/infill (close to lower income communities??)
- Located in the UIC where investment is prioritised (existing corridors, integration zones, etc.)
- Future public investment (known) – BRT & rail, housing, infrastructure, commercial/retail
- Current delivery rates: where is the market currently delivering, and how much?
- Demand? Is there specific private sector momentum building within/in support of certain nodes? Are there specific economic clusters that are starting to define the economic character of a certain node? (e.g. Woodstock being a 'creative and design' node, N'Dabeni being a biotech or food & beverage hub, etc.).

8.6.4. Land availability

- Opportunities for redevelopment and/or conversion of old buildings and or underutilised land parcels
- Vacant land – sites identified as NDAs through Land Use Model

8.6.5. Public facilities

- Established concentration of higher order facilities
- Known future investment for proposed facilities - pipeline
- Identified SS precincts as per CHSIF (backlog / optimised)
- Identify vacant/underutilised land required
- Link to CSIR work currently being completed (include backlog)

8.6.6. Existing data sources

- MSDF nodal designations
- 2012 DP nodal designations
- Current land uses
- New Development Areas – Land Use Model
- Social facilities – CSIR work

- Transport data
 - TAPs
 - PTIs
 - PRow
 - New road/rail/BRT
 - ECAMP

8.7. DESIGNATION OF NODES

8.7.1. Typology

The approach taken for categorising different types of nodes is geared towards making the District Plan more simplified and user friendly for the end user. Thus it is focussing on identifying areas of mixed use concentration of land uses taking cognisance of the scale, levels of accessibility, density and diversity of land uses.

NODES are NOT indicated where:

- There is a concentration of only one land use
- Industrial areas such as Epping, Sacks circle, Blackheath - to be indicated with an appropriate symbol as Employment Opportunity Areas
- Shopping malls/centres unless it is part of a mixed use nodal area as per the definition of nodes e.g. Century City
- Destination places which is not integrated with other land uses e.g. Table Mountain, Nature reserves (to be indicated with an appropriate symbol)
- Stations (rail or bus) that only serves a transport function – unless it forms part of a mixed use nodal area as per the definition of nodes

Taking into consideration that the level of detail will increase as we move towards sub-district guidelines the following typologies are proposed:

Table 13: Typology and characteristics of Nodes

NODAL / PRECINCT TYPES	
Types	Characteristics
Urban Node(all mixed use) E.g. Bellville, Kuilsriver, Platteklloof, Delft	✓ Concentration of different land uses/ activities including commercial, residential, industrial, civic. ✓ Diversity and mix of existing or future land uses. Retail, Commercial, Offices, Light Industrial, Residential, Social facilities, Informal. ✓ At least a mix of 3 different land uses with increased intensities if compared to surrounding areas. ✓ High level of accessibility depending on scale - public transport interchange: Rail, Bus, Tax, (Air); Private; NMT. ✓ Established area showing potential as an emerging node with potential for mix of land uses. ✓ Opportunities for redevelopment and conversion of old buildings. ✓ Vacant land – sites identified as NDAs through Land Use Model.
OTHER CLUSTERS/FOCUS AREAS – NOT TO BE INDICATED AS NODES	
Civic clusters	✓ Concentration of civic facilities including health, education, recreation, government services, etc. ✓ Scale, function and role of social facilities determine the level of the precinct. ✓ Higher order facilities normally part of metropolitan and sub-metropolitan nodes (where integrated). ✓ Concentration of lower order facilities at local and neighbourhood scale ✓ High level of accessibility through various transport modes depending on the scale of the cluster. ✓ Existing civic facilities in need of improvement/ upgrade. ✓ Available vacant/underutilised land to accommodate the backlog and future civic facilities/ clusters and public spaces identified through CSIR process. ✓ Proposed development with potential for development of civic precincts through public-private partnerships.
Destination places e.g. Tygerberg Nature Reserve(nature), Table Mountain, Mamre (heritage)	✓ Areas that are significant landmarks or location either through nature, heritage, cultural or coastal areas. ✓ Could be part of a different nodal type if other facilities are clustered with the destination place e.g. heritage landmarks with other civic facilities.

8.7.2. Scale, Role and Functions of Nodes

Taking into consideration all the work existing information the proposal is to have four scales of nodes namely Metropolitan, District, Local and Neighbourhood. The tables below indicate the role and function that each of these would have in relation to its context.

8.7.3. Symbology

To be identified using circles of different sizes to indicate the different scales of nodes. Details on the scale of the node will be captured in the text of the document. The distinction between existing and emerging nodes will only be reflected in the narrative of the development guidelines.

Table 14: Role and function, characteristics of nodes

SCALE	Metropolitan	District	Local	Neighbourhood
ROLE AND FUNCTION	City wide significant as well as significant role and function in terms of cross-border (municipal, provincial & international) importance (e.g. Bellville & CT CBD & CTIA)	Significant role and function for the district but also across district boundaries.	Specific role and function in terms of providing services and facilities that the local community require.	Specific role and function in terms of providing basic services that the immediately surrounding community require.
CHARACTERISTICS	✓ Multi-modal transport areas/interchanges with a strong focus on public transport (PT1 & PT2 zones where already incentives for parking provision). ✓ In close proximity to, along or adjacent to high accessibility and activity routes. ✓ Existing/Emerging higher intensity mixed land use locations. ✓ Established / emerging concentration of higher order public facilities and/or services. ✓ Located in the UIC where investment is prioritised. ✓ Approximate radius of facilities up to 2,5 - 3km (as a guideline) own future public investment – e.g. BRT & rail, housing, social infrastructure, commercial/ retail.	✓ Areas of high accessibility at or in close proximity of multi-modal transport interchanges. ✓ Mix of office retail, residential, commercial and civic facilities. ✓ Concentration of facilities that serve the district (but also neighbouring districts and municipalities). ✓ STA: UIC and or IGA where investment is prioritised and serves existing communities. ✓ Approximate radius of facilities up to 2km(as a guideline).	✓ Low and medium intensity mixed land use areas that serve the local community: residential, retail and civic facilities. ✓ Level of accessibility for NMT and close to access points for public transport. ✓ In close proximity of clusters of lower order civic precincts. ✓ Approximate radius of facilities up to 800m(as a guideline).	✓ Low and medium intensity mixed land use areas that serve the local residents: local shops and services e.g. hair salons, fast food outlets, doctor's surgeries. ✓ Approximate radius of facilities up to 400m(as a guideline).

S C A	Metropolitan	District	Local	Neighbourhood
OPPORTUNITIES	✓ Potential for land use intensification (high density and diversity) especially in and around very high accessibility locations (around PTIs, existing rail stations). ✓ Opportunities for redevelopment/conversion of older buildings and or underutilised land parcels. ✓ Vacant/underutilised land in close proximity – sites identified as NDAs through Land Use Model. ✓ Optimisation of existing public facilities in order to create multi-functional facilities. ✓ Opportunities to increase/enhance NMT especially to/from public transport interchanges / access point.	✓ Vacant/underutilised land in close proximity – sites identified as NDAs through Land Use Model. ✓ Opportunities for redevelopment. ✓ Opportunities to increase/enhance NMT especially to/from public transport interchanges/access point. ✓ Optimisation of existing /design of new public facilities in order to create multi-functional facilities and spaces.	✓ Small and Micro Enterprise Overlay zone of residential land and along activity streets (to be encouraged)- support home occupations. ✓ Opportunity for incremental densification through 2nd/3rd dwelling units, subdivision of larger properties and medium density residential development closer to high accessibility points. ✓ Vacant / underutilised land for medium density residential infill development – closer to employment opportunities / public transport access points. ✓ Optimisation of existing /design of new public facilities in order to create multi-functional facilities and spaces.	✓ Opportunities for home occupations (that serve local community) . ✓ Opportunity for incremental densification through 2nd/3rd dwelling units, subdivision of larger properties and medium density residential development closer to high accessibility points. ✓ Optimisation of existing public facilities in order to create multi-functional facilities and create safe public spaces.

TECHNICAL ANNEXURE 9: BACKGROUND AND METHODOLOGY FOR SPATIAL TRANSFORMATION DELINEATION

9.1. Introduction

The delineation of the boundaries between the different STA's stems from Section 6.2 (Specific actions arising from policy statements) of the MSDP (2018) where the requirement is, inter alia, to "Confirm cadastral extent and delineation of Urban Core and Incremental Growth and Consolidation Areas." The sections hereunder provide the background as extracted from the MSDP (2018) and puts forward the rationale/narrative for the delineation of these boundaries in the District Plans.

9.2. Background

The City is challenged in an era of spatial, economic and fiscal consolidation characterised by an increasing reliance on informality as well as vulnerability to environmental stresses and shocks. Accordingly, it must focus resources inwards in support of intensification and prioritise investment in favour of sustainable job-generating economic growth over the medium-term. This objective is a precondition to the realisation of all other spatial development goals including poverty reduction and social mobility, improving spatial equity and accessibility, decreasing carbon emissions and enhancing environmental protection and resource efficiency.

A new spatial transformation agenda has emerged in the planning legislation and the City has recommitted to spatial transformation in the IDP. More specifically, the City is committed to "employing a range of new generation urban growth management tools and processes" and considering "the designation of priority areas, managed growth areas and protection areas with associated development parameters and procedural guidelines".

Spatial transformation is based on reversing the impact of apartheid spatial planning by creating more opportunities for more people in highly connected areas. Further, it seeks to counter the creation of new low-income communities on the periphery of the city and the need for the poor to spend a disproportionate amount of their income on transport.

The basis for growth management in the City is established via four primary Spatial Transformation Areas (STAs) and four localised 'unique' areas namely:

- Urban Inner Core
- Incremental Growth and Consolidation Area
- Discouraged Growth Area

- Critical Natural assets
- Unique Cases: Atlantis, Paardevelei, Philippi Agricultural Areas (PHA) and Swartklip.

9.3. Approach towards delineation of STAs

The section below briefly describes the STAs and how it will be translated into the District Plans.

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

The Spatial Anatomy of the (Blue) Turtle

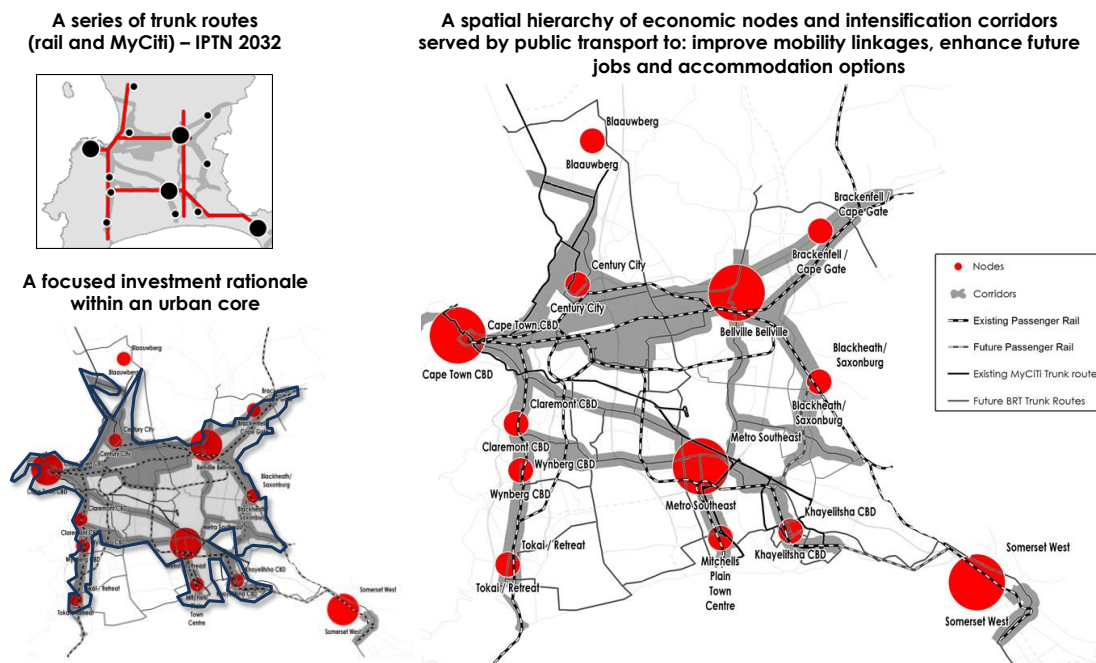


Figure 7: Spatial anatomy of the Blue Turtle

The Urban Inner Core was framed by the conceptual designation of high order nodes and land use intensification corridors (see diagram below), and underpinned by the IPTN trunk routes (rail and MyCiti). The delineation in the MSDF was based on the premises as put forward in Section 6.1. of the MSDF.

The UIC represents the priority development and investment focus for the City, where capital and operational infrastructure investment must be prioritized to support intensification of land use and spatial transformation. This includes the prioritization of budgets, spatially targeted incentives prioritized and incentives and regulatory reform. However, developing incentives, obtaining co-operation and collaboration between different spheres of government and the private sector, as well as effecting regulatory reform will take time.

Therefore, it has been resolved to retain the demarcation of the UIC in the District Plans as an informant, as the long term goal should continue to focus on achieving the aforesaid objectives. However, for the timeframe of the District Plans and in particular at this scale of planning, the spatial designation of the UIC planning should be refined to areas of 'development focus', i.e. Development Focus Areas (priority), being located within the ambit of the spatial anatomy of the UIC, i.e. focus narrowed down to targeted areas with highest level of accessibility and highest transformative impact, where dedicated infrastructure capacity and budget is required to facilitate development and or investigate development options.

9.3.2. Incremental Growth and Consolidation Areas¹⁹ (20%) – IGA;

The IGA 'rounds off' the limit of the urban footprint of the City, i.e. where land use rights have been granted and or implemented. The emphasis regarding the investment rationale is to ensure that infrastructure is maintained and upgraded to ensure efficiency and sustainability of the existing settlement pattern, but also to allow for infill development and incremental growth.

The IGA is conceptually demarcated in the MSDF, where it provides the direction where development will be considered, and ultimately be limited against the DGA, dependent on the availability of bulk services. Therefore, development applications will be considered in the IGA's in terms of desirability, as in other areas within the urban footprint.

The focus will therefore need to be on the demarcation of the outer limits of the urban footprint. It needs to be recognized that the demarcation of the boundary between the IGA & DGA is conceptual in the MSDF, i.e. 4ha polygons. It is also acknowledged that since the approval of the MSDF, clarity has been sought in this regard, and in certain instances smaller properties, such as smallholdings, were confirmed to be located in the IGA. In this instance, the urban development edge has been re-introduced as a mechanism between the IGA's and the Discouraged Growth Areas (DGA).

9.3.3. Discouraged Growth Areas (28%) – DGA;

Properties located in the DGA implies that, in general land falling within the 'Discouraged Growth Areas' means that, in general, urban development will not be supported, and if a development is approved in such area, the developer will be responsible for the provision of all bulk services, as well as the maintenance thereof for a period of time, to the satisfaction of the different utility departments of the City.

9.3.4. Critical Natural Areas (34%) – CNA

The natural assets include protected areas and conservation areas where the city is committed to service, protect, enhance and extend the assets. This will however be dealt with in more detail in the Environmental section of the District Plan.

9.3.5. Unique Cases: Atlantis, Paardevlei, Philippi Agricultural Areas (PHA) and Swartklip.

The identification of the Spatial Transformation Areas follows a spatial logic and public sector investment logic underpinned by city-wide opportunity and need. It is however, recognized that these categorizations, at a metropolitan-scale, are not capable of resolving land use conflicts in certain areas where a more nuanced approach is required. Four unique cases have been identified where the spatial transformation categorization does not immediately reflect the intent of the SDF. The merit of each unique case is motivated in Technical Supplementary B of the MSDF and guidelines provided.

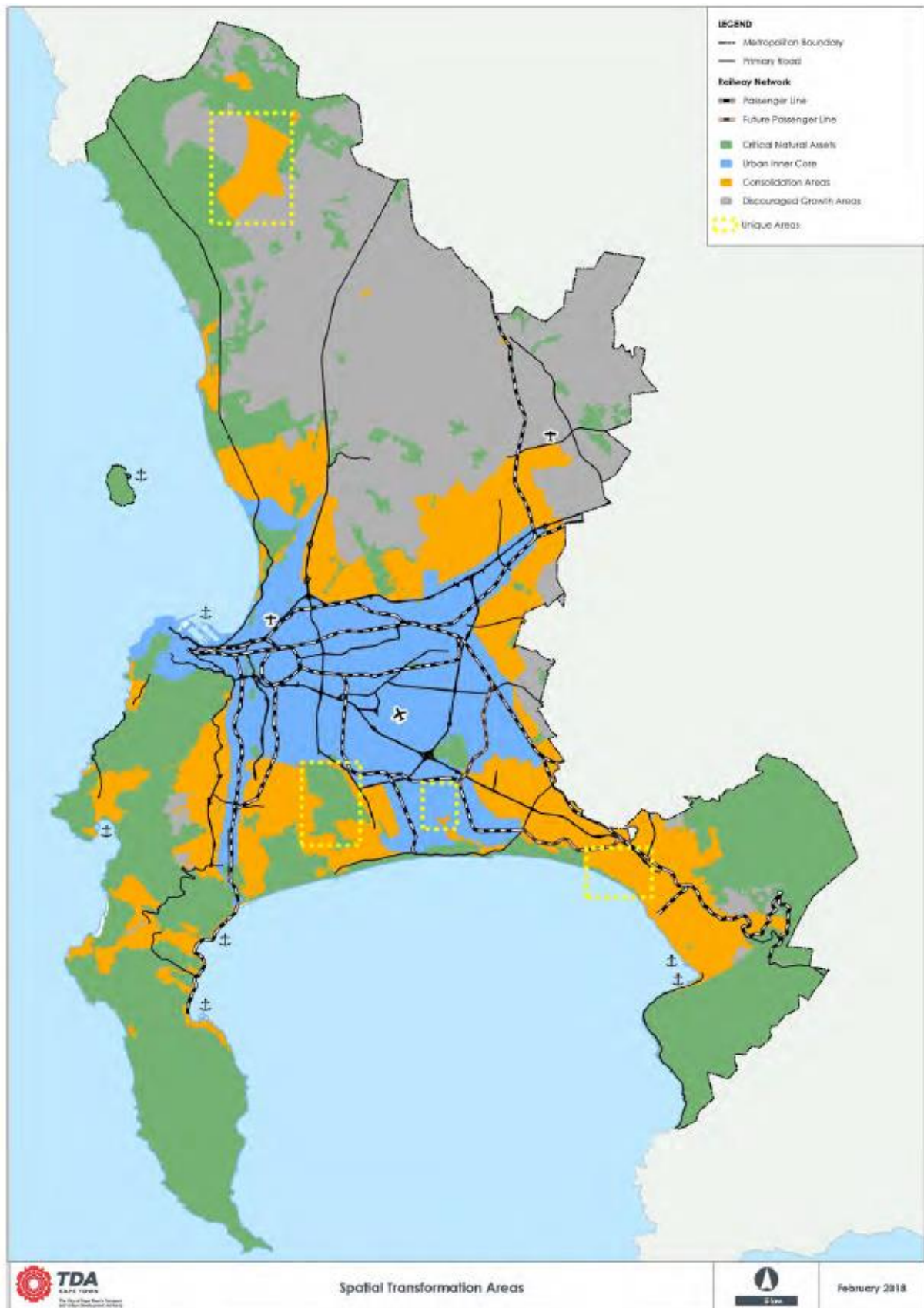


Figure 8: Spatial Transformation Areas (extract from CTMSDF, 2018)

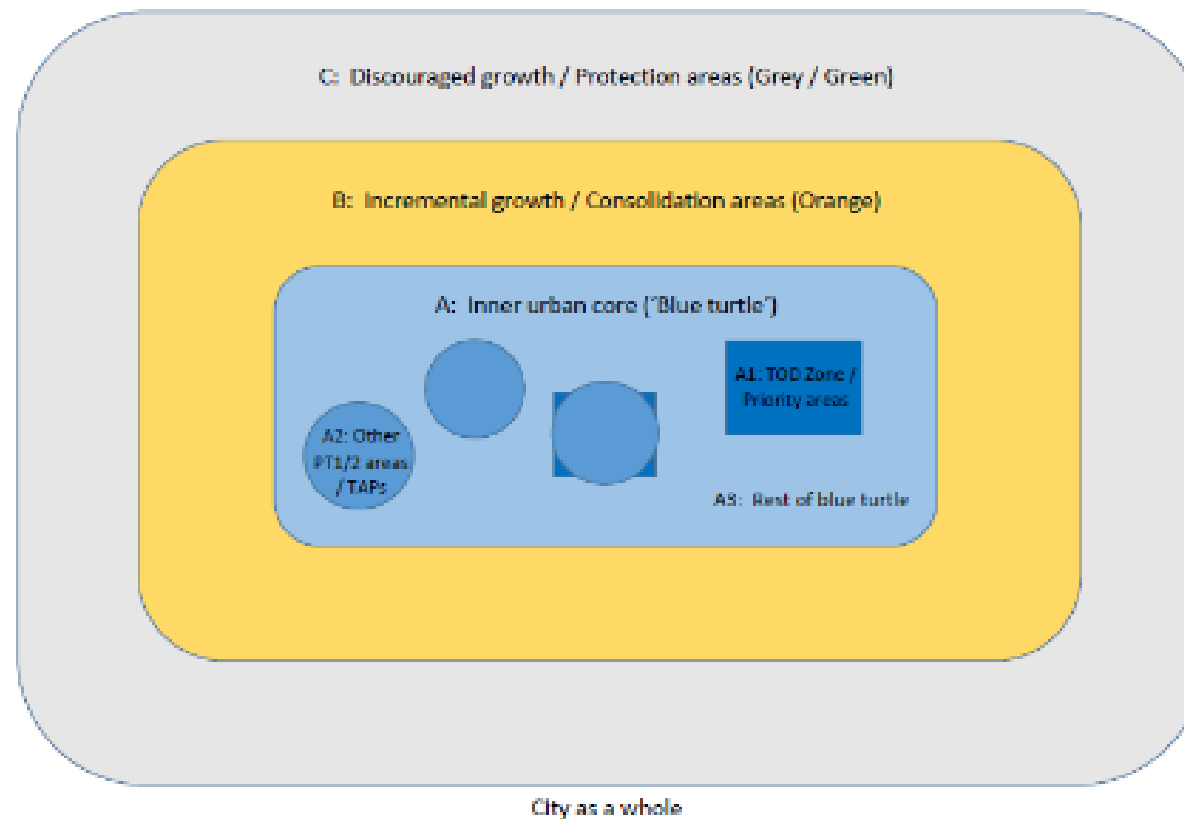
9.4. Guidelines for delineation

The section below will highlight the guidelines used during the delineation of the STAs in the District Plans. The delineation has focussed on three main areas namely:

- Delineating Development Focus Areas within the Urban Inner Core(UIC), and
- Delineation of the “urban development edge” between the Incremental Growth & Consolidation Area (IGA) and Discouraged Growth Area (DGA)

AREA OF DEMARCATION OR DELINEATION	GUIDELINES FOR DEMARCATION AND DELINEATION	SUPPORTING INPUT DATA
A. DEMARCATING AREAS WITH DEVELOPMENT OR REDEVELOPMENT OPPORTUNITY IN THE URBAN INNER CORE	1. Preamble: The delineation of the Urban Inner Core will remain as an informant in the DP (meaning a first priority for bulk services provision). The demarcation in the DP will be narrowed down to targeted areas for urban restructuring that have the highest potential spatial transformative impact (i.e. <i>addressing issues of spatial fragmentation, inefficient urban form and segregation by integrating communities and increasing opportunities to a greater number of people in highly connected areas</i>) where dedicated budget, planning or investment is being prioritized to facilitate development. (Note that these areas should be inside the MSDF delineation). The DFAs are to be prioritized for redevelopment and further intensification/ <i>investigation</i> where applicable.	
	Demarcation of Development Focus Areas:	TAP's, PTI's PT 2 areas are also a guiding tool. Land use overlays or incentive mechanisms such as the UDZ, Heritage exemption

Spatially targeted application of TOD toolkit (Incentives and disincentives)



areas,
Densification
overlay zones,
inclusionary
housing areas,
etc.

Note the above figure describing the approach to spatially targeting TOD.

- focus areas around Public Transport Interchanges;
- focus areas around existing rail stations where there is potential for intensification and elements of social infrastructure or employment in close proximity;
- areas with potential for intensification along existing BRT routes;

	• areas along development corridors (structuring corridors such as freeways questioned due to limited accessibility), i.e. activity routes or activity streets, where such routes will contribute to the principle of TOD-development. There needs to be a sound spatial and market logic for designation (performance vs potential).	
	2. What the focus for identification & delineation should be: • Areas where the focus is 'urban restructuring' and have the highest potential transformative impact. • Areas where dedicated funding (operational or capital), planning or investment is available (or being applied for) and will give rise to implementation. Planning work should at least commence within the lifespan of the District Plan (+- 10 years). ◦ priority areas of opportunity as identified in Catalytic Land Development Pipeline that would serve as catalysts to unlock the potential for integrated development with cross-cutting benefits; ◦ prioritized precincts or local areas in the Integration Zones; ◦ other high profile integrated projects under investigation that are proposed to be implemented in the lifespan of the District Plan. • Areas should generally be considered accessible in line with the City's MSDP and TOD objectives (i.e. within nodes and along development corridors). • Specifically, delineated priority areas i.e. not entire suburbs or corridors.	• NDAs from Land Use Model • Cadastrally-defined Nodes • Cadastrally-defined Structuring Corridors
	3.What the focus for identification should not be: • New Development Areas (even if funding is available i.e. only a housing project) or infill opportunities in general. Areas should generally not overlap with DFA's except in instances where NDAs form part of a broader area identified for urban restructuring. • General Areas for urban intensification, even if located in development/ activity corridors. • Areas with a singular focus, be it transport upgrades, coastal upgrades, public facility upgrades/ development, an informal settlement and/or housing projects. • Should not be conflated with the Urban Support Areas (USAs) or areas of urban regeneration or urban management interventions (i.e. MURP). • Avoid areas along mobility corridors such as freeways except where these are intersected with public transport routes and contribute to the principle of TOD and creation of employment opportunities. There will be the few anomalies such as the airport (CTIA), N1 City, Plattekloof Road (Panorama), Cape Gate/Okavango Road. These are primarily where public transport intersects with freeway systems. The Ottery Road leg of Phase 2A should be demarcated as a priority area. • Areas for environmental conservation and or investigation.	

B. DEFINING THE BOUNDARY OF THE INCREMENTAL AND CONSOLIDATION AREAS AND Discouraged Growth Areas	1. Preamble: Note that the objective is re-introducing the urban edge, defining the boundary between the Incremental Growth & Consolidation Areas and the Discouraged Growth Areas. Input received from the Public Participation Process, land parcels included already via enquiries from consultants/ land owners (and clarity been given by City Growth Management) should be considered. Furthermore, the delineation should be a process of 'rounding off' the boundary, focussed on the following directives. Note that the urban edge as depicted in the existing District Plans (2012), should be utilized as the guiding tool. Also note that the discussions held with the Provincial Dept. of Agriculture and Urban Management should also assist.	
	2. The boundary should not straddle protective natural environments, such as nature conservation areas, river corridors, etc. The line should at all times be a cadastral delineation, except in instances where it is argued that the development application process (inclusive of EIA's) will determine the final line. In those instances a broken line is utilised.	
	3. Where spatial logic allows, linking lower income areas with the urban footprint, should be considered. Pockets / islands of urban related land uses should be minimised working from the principle that the land use rights are "what they are" and will not be expanded further. In such instances the edge needs to be drawn around such settlements, or if it is alone- standing urban uses, should be left outside the urban edge.	
	4. Where it makes sense to 'rounding' off the edge of the urban footprint, where e.g. urban development will bring along an increase in accessibility via road linkages, as well as employment generating land uses. Note that low potential agricultural land does not provide adequate reason for urban development. In certain instances it may be sensible where a land parcel/ property does not represent an agricultural unit anymore, i.e. less than 20ha, (may be different land owner, road extension impacted on land parcel), but the approach should be cautious, and other factors such as accessibility, spatial location, development trend, infrastructure provision etc., surrounding urban/ rural character also need to be considered.	
	5. Please check all MSDF "exceptional cases" tabulated in Section 5.2. Re: Development directives – these were "place-holders" in specific locations that could not be resolved at the time of the approval of the MSDF. Each had specific reasons and logic outlined.	
	6. Areas for inclusion should not include areas where the gradient is steeper than 1:4.	Topography (Gradient < 1:4)
	7. Exclusion zones and other physical and/ or biophysical risk factors such as Koeberg should be respected.	
	8. Other considerations that should be considered, is high visual impact.	

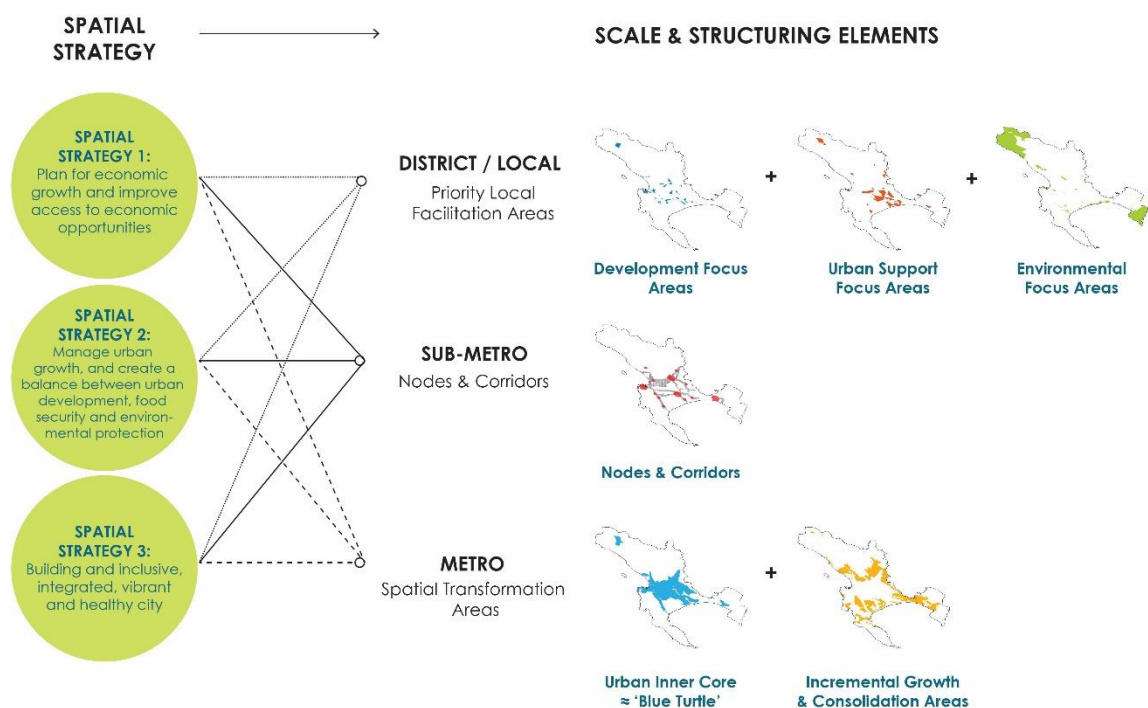
	9. There may be exceptional cases that relate back to drafting the MSDF where agreements have been resolved afterwards											
C. Defining the Coastal edge	1. The Coastal Edge is a demarcated area around the coast in such a position as to limit urban development, primarily to protect coastal resources, and avoid hazards and financial risks pertaining to areas at risk of flooding, storm surges and long term climate change impacts. The coastal edge also represents the City's draft coastal management line. This aligns with the requirements of the Integrated Coastal Management Act, Act 36 of 2014, specifically section 25, that requires municipalities to delineate coastal management. See guidelines from MSDF below:											
	<table><tr><th>ENVIRONMENTAL SUBTHEME</th><th>LAWS / POLICY</th><th>AUTHORITY</th><th>PRINCIPLE THAT APPLIES WHEN CONSIDERING ALLOCATION OF DEVELOPMENT RIGHTS</th><th>EXCEPTIONS</th></tr><tr><td>Coastal Edge Maps 5a, b and d</td><td>Integrated Coastal Management policy and Climate Change Policy (draft), Coastal Economic and Spatial Strategic Framework (draft) and Coastal Management Bylaw (draft).</td><td>CCCI</td><td>Urban development is precluded on the seaward side of the declared coastal edge. Where the coastal edge has been defined to buffer infrastructure against the impacts of coastal processes and to protect coastal ecosystems, it should not be amended. Where development abuts the landward side of the coastal edge but which is at risk to coastal processes, coastal overlay zones must be developed and applied to these areas.</td><td>The coastal edge has made provision for development opportunities at strategically located identified coastal nodes such as Silverboomsstrand, Strandfontein, Mrandi, Morwabisi and Kapteinsskip. Provision is made for the refinement of the coastal edge in these areas once feasibility studies have been undertaken. A number of recreational destination areas within intensive urban areas of high economic value include significant areas seaward of the coastal edge. These areas should remain as primarily recreational areas, but need substantial upgrade to meet changing recreational needs. Provision is made for the refinement of the coastal edge in these areas once feasibility studies have been undertaken or the outcome of current processes are finalised.</td></tr></table>	ENVIRONMENTAL SUBTHEME	LAWS / POLICY	AUTHORITY	PRINCIPLE THAT APPLIES WHEN CONSIDERING ALLOCATION OF DEVELOPMENT RIGHTS	EXCEPTIONS	Coastal Edge Maps 5a, b and d	Integrated Coastal Management policy and Climate Change Policy (draft), Coastal Economic and Spatial Strategic Framework (draft) and Coastal Management Bylaw (draft).	CCCI	Urban development is precluded on the seaward side of the declared coastal edge. Where the coastal edge has been defined to buffer infrastructure against the impacts of coastal processes and to protect coastal ecosystems, it should not be amended. Where development abuts the landward side of the coastal edge but which is at risk to coastal processes, coastal overlay zones must be developed and applied to these areas.	The coastal edge has made provision for development opportunities at strategically located identified coastal nodes such as Silverboomsstrand, Strandfontein, Mrandi, Morwabisi and Kapteinsskip. Provision is made for the refinement of the coastal edge in these areas once feasibility studies have been undertaken. A number of recreational destination areas within intensive urban areas of high economic value include significant areas seaward of the coastal edge. These areas should remain as primarily recreational areas, but need substantial upgrade to meet changing recreational needs. Provision is made for the refinement of the coastal edge in these areas once feasibility studies have been undertaken or the outcome of current processes are finalised.	
	ENVIRONMENTAL SUBTHEME	LAWS / POLICY	AUTHORITY	PRINCIPLE THAT APPLIES WHEN CONSIDERING ALLOCATION OF DEVELOPMENT RIGHTS	EXCEPTIONS							
	Coastal Edge Maps 5a, b and d	Integrated Coastal Management policy and Climate Change Policy (draft), Coastal Economic and Spatial Strategic Framework (draft) and Coastal Management Bylaw (draft).	CCCI	Urban development is precluded on the seaward side of the declared coastal edge. Where the coastal edge has been defined to buffer infrastructure against the impacts of coastal processes and to protect coastal ecosystems, it should not be amended. Where development abuts the landward side of the coastal edge but which is at risk to coastal processes, coastal overlay zones must be developed and applied to these areas.	The coastal edge has made provision for development opportunities at strategically located identified coastal nodes such as Silverboomsstrand, Strandfontein, Mrandi, Morwabisi and Kapteinsskip. Provision is made for the refinement of the coastal edge in these areas once feasibility studies have been undertaken. A number of recreational destination areas within intensive urban areas of high economic value include significant areas seaward of the coastal edge. These areas should remain as primarily recreational areas, but need substantial upgrade to meet changing recreational needs. Provision is made for the refinement of the coastal edge in these areas once feasibility studies have been undertaken or the outcome of current processes are finalised.							
2. The demarcation should be; "As per the approved 2018 MSDF and in line with the Integrated Coastal Management Act, Act 36 of 2014, Section 25."												
3. The base info layer on the delineation as per the MSDF is available from the Urban Management Branch.												

TECHNICAL ANNEXURE 10: DEFINING CRITERIA FOR THE IDENTIFICATION OF THE DFAS, USFAS AND EFAS

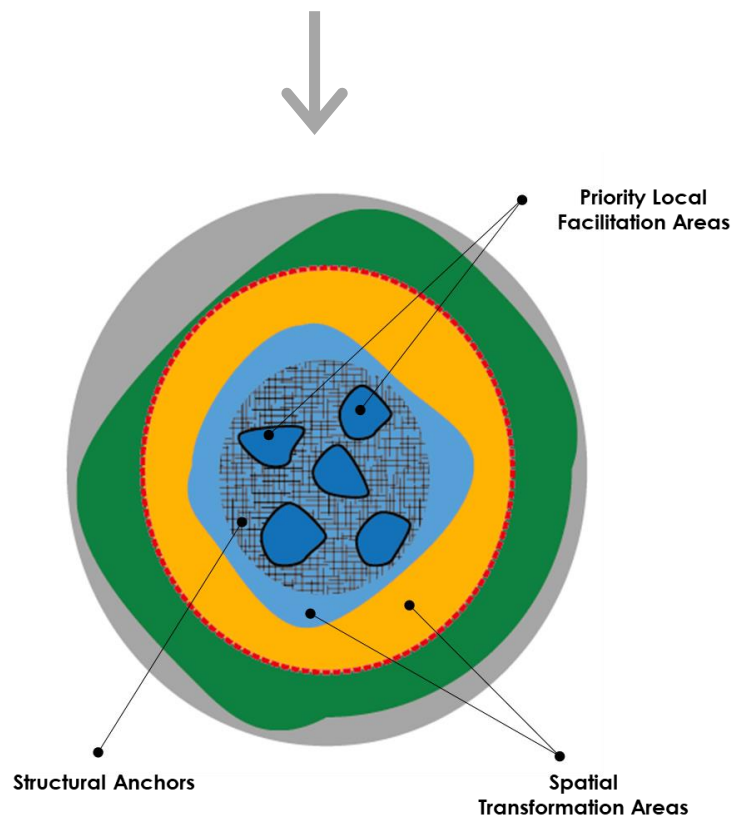
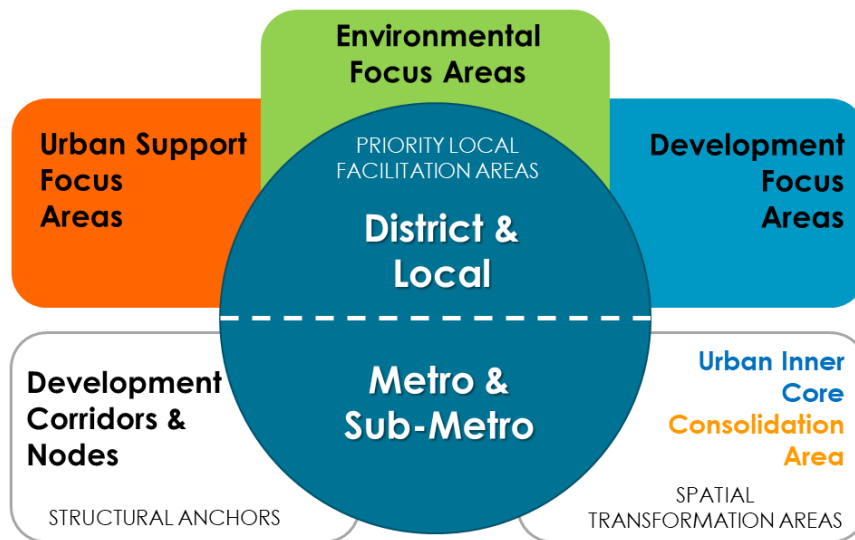
Priority Local Facilitation Area Identification Methodology

10.1.1. Overview

The purpose of the District Plan spatial targeting framework is to identify and prioritise specific areas within each district for public investment and / or incentives in the short-medium term in order to implement the spatial vision and objectives reflected in the District Plan. Areas are prioritised based on the rationale and emphasis for growth management and investment set out by the MSDF. The DSDF Spatial Targeting Framework consolidates the relevant spatial structuring elements that best reflect the City's spatial strategies & priorities at each scale of planning.



The District SDF Spatial Targeting Framework expands upon the MSDF's Spatial Prioritisation and Investment Framework through the designation of, new district / local level spatially targeted areas, the **Priority Local Facilitation Areas**. At this scale, greater attention is placed on local elements that should inform and direct implementation, public investment decisions, budgets and planning focus. The three Priority Local Facilitation Areas identified are the Development Focus Areas, the Urban Support Focus Areas, and the Environmental Focus Areas.



The Priority Local Facilitation Areas provide the district level basis for spatial prioritisation and aim to guide implementation through directing public investment, incentives, budgets and planning focus for the short to medium term (i.e. the lifespan of the DSDF).

While several priority local facilitation areas for each of the districts have been identified; the framework is intended to be flexible and other local areas may be identified as areas of priority for during the 5 year review of the integrated DSDF and EMFs.

10.1.2. Metro and Sub-Metro Spatial Informants

At the metropolitan level, the basis for growth management and investment in the city is through four primary Spatial Transformation Areas:

- Urban Inner Core
- Incremental Growth & Consolidation Areas
- Discouraged Growth Areas
- Critical Natural Areas

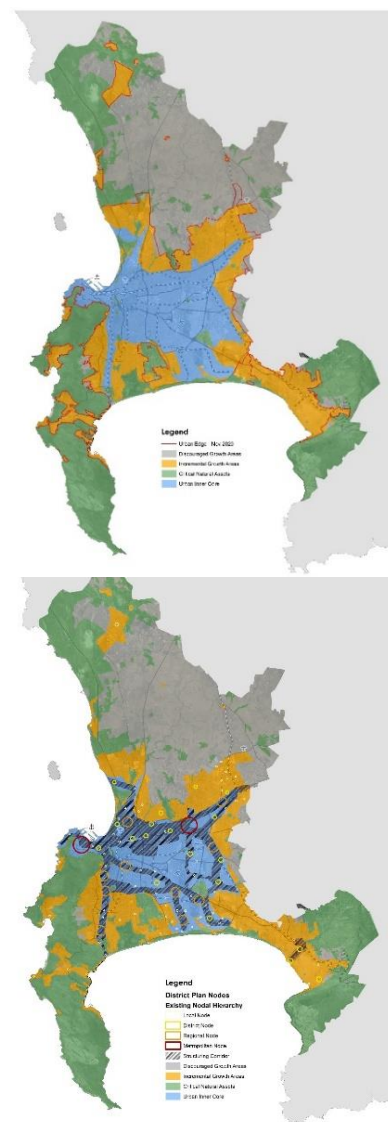
At a sub-metro level the basis for spatial prioritisation are the major structuring elements:

NODES:

- Urban areas appropriate for a clustering of higher intensity (i.e. diversity and density) land uses that are located and concentrated at points of maximum accessibility (either through public and/or private transport), exposure, convenience and opportunity.

DEVELOPMENT CORRIDORS:

- Urban areas of high-intensity (i.e. dense and diverse) nodal or 'strip' development generally supported by a hierarchy of transport services that function as an integrated system to facilitate ease of movement for private and public transport users. They are characterised by a dynamic, mutually supporting relationship between land use and the movement system.



10.1.3. District / Local Level Spatial Informants

At a district / local level the basis for spatial prioritisation and guiding implementation, investment, budgets and planning focus are the following newly delineated priority local facilitation areas.

10.1.4. Priority Local Facilitation Area Definition:

Spatially targeted areas identified in the DSDFs that provide the district / local level basis for spatial prioritisation and aim to guide implementation through directing public investment, incentives, budgets and planning focus for the short to medium term. These include the Development Focus Areas (DFAs), Urban Support Focus Areas (USFAs) as well as Environmental Focus Areas (EFAs).

DEVELOPMENT FOCUS AREAS

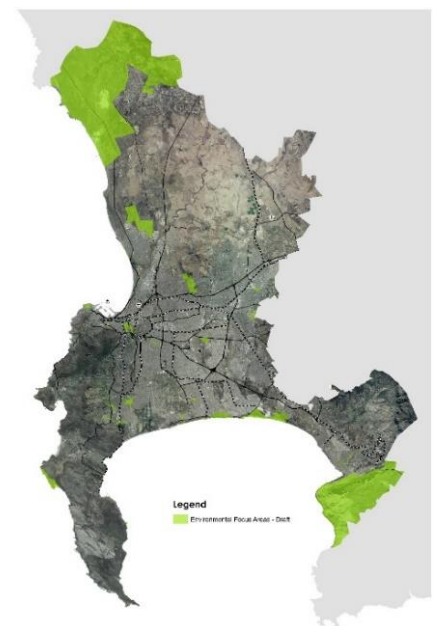
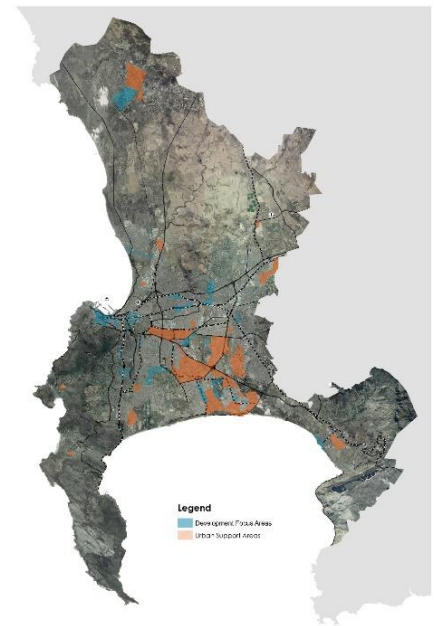
- Targeted local areas for urban restructuring and planning focus in the short - medium term that have the highest potential spatial transformative impact with dedicated budget, planning or investment to facilitate development.
 - Includes CLDP, Integration Zone PLAs, Priority Precincts, SEZ, ECAMP

URBAN SUPPORT FOCUS AREAS

- Spatially targeted local areas that are faced with a combination of challenges including but not limited to infrastructure failure and service delivery challenges; high socio-economic need and crime rates and require a coordinated public investment and planning approach in the short to medium term.
 - Include MURP / MVSA

ENVIRONMENTAL FOCUS AREAS

- Spatially targeted areas with critical environmental significance (in terms of national conservation targets) outside of formally protected areas which have been identified as priority areas for investment and/or protection in the short to medium term, but are not within designated DFAs and USFAs and hence require equivalent focus.



The identification criteria and rationale behind each of these areas is discussed below.

10.2. Development Focus Areas (DFAs)

10.2.1. Definition

Targeted areas for urban restructuring and planning focus in the short - medium term that have the highest potential spatial transformative impact with dedicated budget, planning or investment to facilitate development.

10.2.2. Defining criteria for the identification & delineation of DFAs

The integrated DSDF and EMFs refined the Urban Inner Core to areas of 'development focus' or priority, i.e. Development Focus Areas for the period of the DSDF (10 year cycle) – the **dark blue**.

Focus narrowed down to targeted areas for **urban restructuring** that have the highest potential **spatial transformative impact** (*i.e. addressing issues of spatial fragmentation, inefficient urban form and segregation by integrating communities and increasing opportunities to a greater number of people in highly connected areas*) where **dedicated budget, planning or investment** is, and should be prioritised to facilitate development.

These are areas that have a high potential to attract private sector investment.

STEP 1: IDENTIFICATION & DELINEATION

A. Identification Criteria

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

Criteria	Data
1. Areas where the focus is 'urban restructuring' and have the highest potential transformative impact. These are areas that exhibit the highest location potential linked to the definition of Spatial Transformation and should be identified within the City's Urban Inner Core unless as far as possible.	• STAs • Development Corridors • Nodes • Mixed Use Intensification Areas
2. Areas linked to projects with a multi-sectoral focus where there is funding available (be it operational and/or capital), or funding to be applied for, for planning that will give rise to implementation.	• CLDP • Integration Zone Priority Areas and Precincts • Approved LASDFs • Future Local Area or Precinct Planning Priorities identified in the DSDF

a. priority areas of opportunity as identified in Catalytic Land Development Pipeline that would serve as catalysts to unlock the potential for integrated development with cross-cutting benefits e.g. Bellville PTI, Philippi Opportunity Area. b. Planned LSDFs, Precinct Plans, etc. c. prioritized precincts or local areas in the Integration Zones d. other high profile integrated projects under investigation that are proposed to be implemented in the lifespan of the District Plan such as the Atlantis SEZ.	
3. Areas should be considered highly accessible in line with the City's MSDF and TOD objectives.	• IPTN (Integrated Public Transport Network); • PRow (Public Right of Way) • Transit Accessibility Precincts • Key development routes and connector route and intersections
4. 5 -10 year frame - Planning work at least to commence within the lifespan of the DSDF.	

B. Delineation Guidelines

- Do not delineate areas where **development is not permitted**. These include Proclaimed Environmental Areas and Risk and Precautionary Areas, inter alia:
 - Conservation Areas and Nature Reserves
 - Aquifer Extraction Areas
 - 5km Koeberg Evacuation Zone etc.
 - Land Fill Buffer
 - Exclusionary Buffers to Risk Industries
 - Discouraged Growth Areas
 - Areas outside the coastal edge

Consider the relevant spatial data in the Biophysical and Risk Sections of the Baseline Analysis.
- Specifically, **delineate priority areas** i.e. not entire suburbs or corridors.
- Delineation should be aligned to existing precinct or prioritised area boundaries where applicable (i.e ECAMP, CLDP or IZ Precincts)

C. What the focus for identification **should not be**:

- New Development Areas (even if funding is available i.e. only a housing project) or infill opportunities in general. Areas should generally not overlap with

DFA's except in instances where NDAs form part of a broader area identified for urban restructuring.

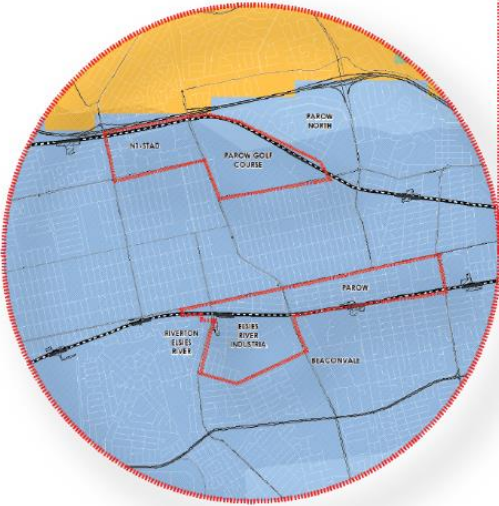
- General areas for urban intensification, even if located in development/ activity corridors.
- Areas with a singular focus, be it transport upgrades, coastal upgrades, public facility upgrades/ development, an informal settlement and/or housing projects.
- Should not be conflated with the Urban Support Focus Areas (USFAs) or areas of urban regeneration or urban management interventions (i.e. MURP).
- Avoid areas along mobility corridors such as freeways except where these are intersected with public transport routes and contribute to the principle of TOD and creation of employment opportunities.
- Areas for environmental conservation and or investigation.

STEP 2: VERIFICATION

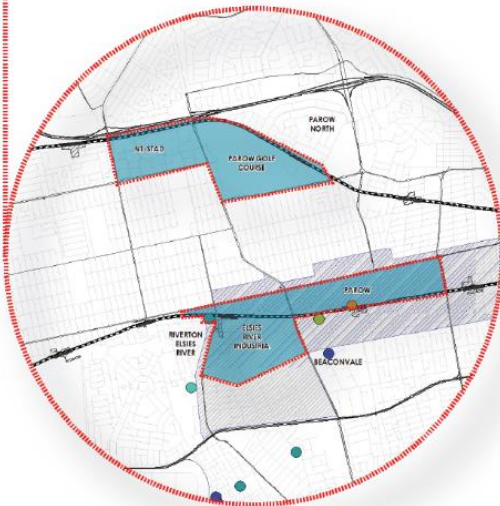
Once the planners have identified and delineated their DFAs, the following checklist will be used to verify that each area identified meets the criteria. An area must meet all the criteria in the checklist to be considered a DFA.

Development Focus Areas - Criteria

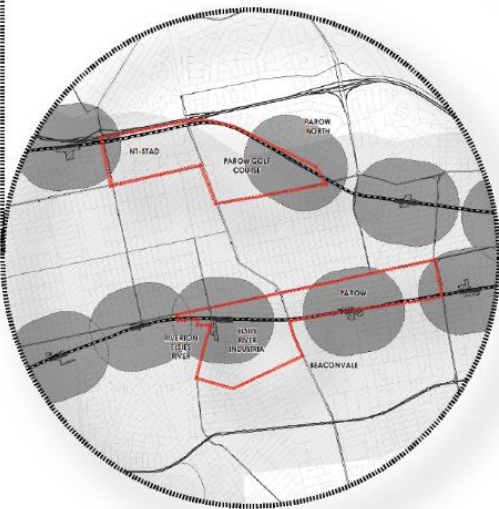
	Urban Restructuring / Transformative Potential	High Levels of Accessibility	Dedicated Funding, Planning or Investment (<10 years)	Multi-Sectoral Focus	Priority Areas			Final Selection	Comment
	Qualitative - Location Potential / Spatial Vision	IPTN (PT Activity Levels) and PROW Networks	Future Local Area/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



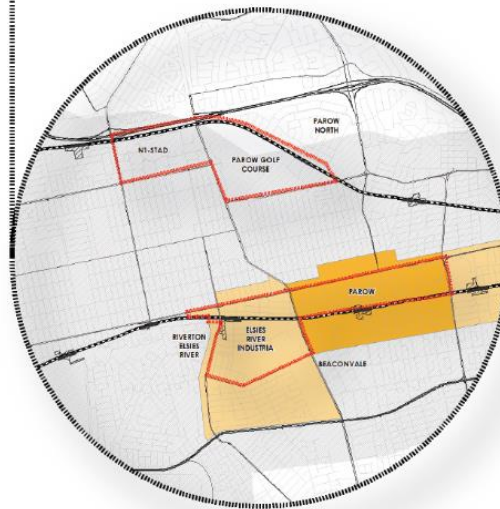
- ✓ Urban Inner Core
- ✓ Development Corridor
- ✓ Node



- ✓ Heritage Exemption
- ✓ Prioritised Precinct Plan
- ✓ Multiple Investment Projects



- ✓ Existing Rail (IPTN)
- ✓ Existing TAPs
- ✓ Development Route
- ✓ Connector Route



- ✓ VRC Integration Zone Priority Area
- ✓ Level 1 CLDP Priority Site (Parow Golf Course/ Monte Vista Station)

Development Focus Areas - Criteria								Other Opportunity Areas		
	Urban Restructuring / Transformative Potential	Dedicated Funding, Planning or Investment (<10 years)	High Levels of Accessibility	Multi-Sectoral Focus	Priority Areas			ECAMP	Final Selection	Comment
					CLDP Programme	Integration Zone Priority Precincts	Other High Profile Project			
	Qualitative - Location Potential / Spatial Vision	Future Local Area/ Precinct Priorities	IPTN (PT Activity Levels) and PROW Networks	Qualitative – Public Investment and Projects	Full Catalytic Land Development Pipeline	Priority Precincts Identified in Integration Zones	Special Economic Zones, Other	Areas identified as part of the Economic Areas Management Plan		Justification / notes / other
Name (Image)	✓	✓	✓	✓	–	✓	–	✓	✓	Meets all criteria
Name (Image)	✓	✗	✓	✓	✓	–	–	–	✗	
Name (Image)	✓	✗	✓	✗	–	–	–	✓	✓	

10.3. Urban Support Focus Areas (USFAs)

10.3.1. Definition

Spatially targeted areas that are faced with a combination of challenges including but not limited to infrastructure failure and service delivery challenges; high socio-economic need and crime rates and require a co-ordinated public investment and planning approach in the short to medium term.

10.3.2. Defining criteria for the identification & delineation of USFAs

The Urban Support Focus Area designation aims to identify areas which need support over and above the regular processes available. It is a call for assistance from all involved. This designation recognises areas characterised by a combination of: infrastructure failure and service delivery challenges; high socio-economic need / vulnerability and a need for coordination among projects, programmes and stakeholders.

The following characteristics may be present: uncertainty of what should be done, how and by whom; informality and overlapping challenges; high socio-economic vulnerability, standard norms, guidelines and processes may be incongruous with the contextual realities; the area is in need of public investment but not necessarily strategically located; there is room for improved communication between stakeholders, including within government, and with resident communities; there may be plans for the area but implementation is lacking.

The key emphasis and desired outcomes of these areas include:

- Implementation of programmes that enhance social and economic mobility;
- Service upgrading, local economic development and poverty alleviation;
- Facilitation of a range of human settlements interventions (delivery methods, partnerships, typologies etc.);
- Social infrastructure backlogs and operational deficiencies addressed;
- Elimination of non-essential regulatory constraints on informal economic activity within poorly-located marginal areas;
- Extension of effective urban management practices and programmes;
- Unlocking development of large-scale economic opportunities within close proximity to areas of social need; and
- Streamlining of regulatory requirements to support and facilitate formal densification that is taking place in settlement. (e.g. Boarding house developments in Dunoon).
- Spatial Planning interventions including local area frameworks
- Plan and implement safe well lit walkways and enhance pedestrian movement systems and public realm interventions to create a sense of place.

POLICY GUIDELINES PROCESS TO BE CONCLUDED WITH POLICY & STRATEGY

STEP 1: IDENTIFICATION & DELINEATION

A. Identification Criteria

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

Criteria	Data
1. Areas of high socio-economic need / vulnerability	• Social Vulnerability Index (No annual update) ◦ Informality <i>high density in informal settlements and backyard shacks.</i> ◦ Density (<i>household and population densities per km²</i>) ◦ Poverty: income based segmented classification (NLI), which <i>classifies areas according to their income and various lifestyle characteristics</i> • Crime Levels (SAPS 2019/20) ◦ Reported Cases (all crimes) per Police Precinct ◦ Annual updates from Corporate Services • Social Facilities Backlog Data Social Facility Backlog - Level 5 Catchment from CSIR Work - Ziyaad Lalla (No annual update)
2. Areas with a combination of service delivery challenges / built environment need.	• MTIIF 2015 (COCT) Infrastructure constrained areas supplemented with DSDF updates ◦ Concern regarding replicability / reliability of dataset • WTS Program Outputs ◦ Urban Management / Service Delivery Issues ◦ Compare to C3 output
3. Areas with a need for coordination: - A local area planning initiative is needed OR is in progress OR has been completed, And there is not a clear single department to take forward the implementation - There are 2 or more government projects or programmes in process and there is opportunity for greater coordination. This does not mean that there is not coordination already, but that the area and project managers could use more assistance.	• Qualitative Input from district planner • Alignment with MURP/MVSA • Confirmation with UISP

- **New Changes 2021/07/14**

Criteria 1 and 2 were combined in a multi-criteria analysis matrix, all data inputs were converted to a score of between 1 and 5 depending on severity and combined with the following weightings:

	Weighting
Socio-Economic Vulnerability Index	2
Social Facility Backlog	1
Crime Levels	1
Urban Management / Service Delivery	1
Infrastructure Capacity Backlog	0

The MCA map attached (first two criteria) acts as a guide to assist in identifying areas where the identified Vulnerability criteria may be relevant. The dataset is filtered as below.

0-200 = lower need,

>200 = higher need

B. Delineation Guidelines

- Using the areas identified in the map as a guide, select areas which also meet the third criteria - Need for Coordination
- Specifically, **delineate priority areas** i.e. not entire suburbs or corridors.
- Delineation should be aligned to existing precinct or prioritised area boundaries where applicable (i.e. ECAMP, CLDP, MURP, MVSA or IZ Precincts).

C. What the focus for identification should not be:

- Remember the following are not automatically included:
 - Informal Settlements,
 - In situ upgrade,
 - Land Invasions.

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

STEP 2: VERIFICATION

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

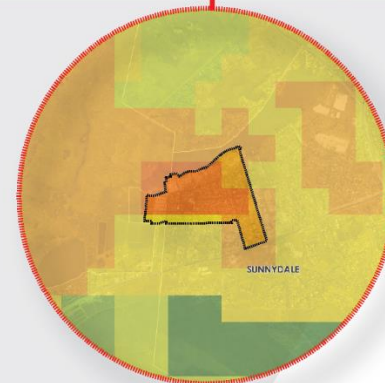
Urban Support Areas - Criteria

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



Severe Lack of
Infrastructure Capacity

+



High Socio Economic
Vulnerability

=



Combined Scoring



Delineated USA

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

10.4. Environmental Focus Areas (EFAs)

10.4.1. Definition

The Environmental Focus Areas (EFAs) are areas with critical environmental significance (in terms of national conservation targets) outside of formally protected areas which have been identified as priority areas for investment and/or protection for the short to medium term (the lifespan of the District Plan).

10.4.2. Defining criteria for the identification & delineation of EFAs

Balancing the pressures of urbanisation and environmental management requires prioritising the management of environmental resources as part of a more integrated approach to climate change adaptation and adapting urban development in order to promote more efficient use of resources and reduce the impacts of urban development on the environment.

This designation recognises the role of environmental resources in terms of its contribution toward enhancing the economic potential and social amenity value of areas whilst improving the City's resilience in the face of climate change and other threats, particularly in more vulnerable areas and/or communities.

To identify and prioritise environmental focus areas, a set of criteria was used to select environmental projects and programmes which are/or have:

1. Catalysts for integrated development with cross-cutting benefits –
 - Supports environmental priorities as well as enhance the economic potential and social amenity of the area.
 - Reduce biophysical risk to communities
 - Areas under threat from urban development
2. Funding, Planning or Investment within the 3 year MTREF period or planning for funding/ in process or to be applied for within the 5-10 year IDP and District Plan lifespan.
3. Priority Area Alignment (i.e. DFAs, USFAs, Destination Places or new EFAs based on options provide).

The final selection of projects which informs the identification of Environmental Focus Areas is based on there being evidence of all 3 abovementioned criteria.

STEP 1: IDENTIFICATION & DELINEATION

A. Identification Criteria

The EFAs are to be prioritized for public investment and support based on the following criteria. To assist with the identification of the EFAs, a list of criteria has been recommended for consideration and be will used to verify the project/area once identified.

Criteria	Project /Area Scope
Catalysts for integrated development with cross-cutting benefits	• Supports environmental priorities as well as enhance the economic potential and social amenity of the area. • Reduce biophysical risk to communities • Areas under threat from urban development
Funding, Planning or Investment	• Dedicated Funding, Planning or Investment (<10 years) ◦ within the 3 year MTREF period • Planning for Funding/ in process or to be applied for ◦ within the 5-10 year IDP and District Plan lifespan.
Priority Area Alignment (i.e. DFAs, USFAs, Destination Places or new EFAs based on options provide).	• Development Focus Areas • Urban Support Focus Areas • Destination Places • Environmental Focus Areas

B. Delineation Guidelines for Environmental Focus Areas

- Areas with critical environmental significance (in terms of national conservation targets) and consolidation potential outside of formally protected areas not aligned with already designated DFAs and USFAs, preferably state-owned (i.e. municipal, provincial, national). Areas within formally protected areas will only be considered where prioritisation is strongly motivated and verified.

C. What the focus for identification should not be:

- Remember the following are not automatically included:
 - Formally protected areas
 - Small fragmented biodiversity areas which do not promote ecosystem connectivity

STEP 2: VERIFICATION

Once the Environmental Management Department and Catchment Stormwater and River Management colleagues identified and delineated their priority projects based on the criteria provided, each project was screened by nominated officials to ensure projects identified meets the criteria. An area/project must meet all the criteria in the checklist to be considered an EFA.

DSDF Environmental Focus - Criteria										
1. Catalyst for integrated development with cross-cutting benefits			2. Funding, Planning or Investment		3. Priority Area Alignment (Minimum of one required)				Final Selection	Comment
Supports environmental priorities as well as enhance the economic potential and social amenity of the area.	Reduce biophysical risk to communities	Areas under threat from urban development	Dedicated Funding, Planning or Investment (<10 years)	Planning for Funding/ in process or to be applied for.	Development Focus Areas	Urban Support Areas	Destination Places	New DSDF Environmental Focus Area		
					✓	✓	✓	New demarcation required		
								✓		

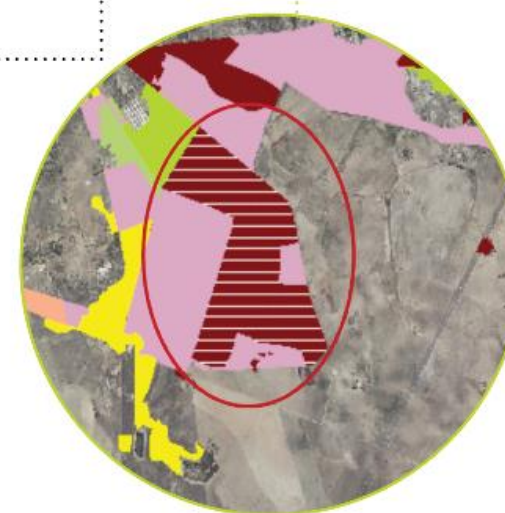
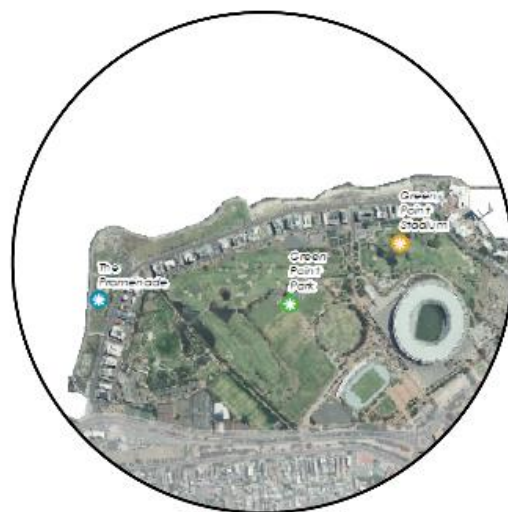


✓
'Urban restructuring' / highest potential transformative impact

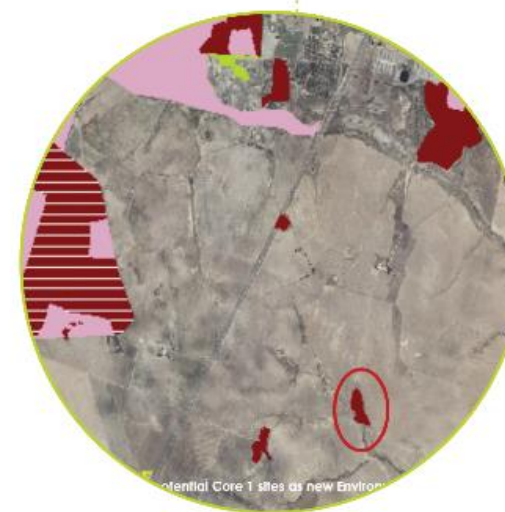
✓
Service Delivery/Built Environment/Socio-economic Need and Vulnerability



✓
Coastal, Natural or Urban Special Places or Potential Destination Place



✓
Larger sites with critical biodiversity that is significantly below the national conservation targets (e.g. Lourensford Alluvium Fynbos currently has 7% coverage compared to national target of 30%). Unconserved prime endemic biodiversity under threat of invasion or degradation (e.g. Cape Flats Sand Fynbos). Biodiversity expansion areas which promote ecosystem connectivity identified for formal protection.



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

		DSDF Environmental Focus - Criteria										
		1. Catalyst for integrated development with cross-cutting benefits			2. Funding, Planning or Investment		3. Priority Area Alignment <i>(Minimum of one required)</i>					
		Supports environmental priorities as well as enhance the economic potential and social amenity of the area.	Reduce biophysical risk to communities	Areas under threat from urban development	Dedicated Funding, Planning or Investment (<10 years)	Planning for Funding/ in process or to be applied for.	Development Focus Areas	Urban Support Areas	Destination Places	New DSDF Environmental Focus Area		
District	Project / Programme Area	Investment in support of environmental priorities (e.g. biodiversity gains, water conservation, reduce urban heat, promote environmental awareness) with the ability to enhance the economic potential and social amenity of the area by adding value in terms of the liveability and quality of the public realm. Examples below include the Adderley Street Fountain Precinct and the Trafalgar Park LUW projects.	Requires mitigation through environmental operations or capital investment to reduce vulnerability of urban support areas (USAs) and maintain the latent potential of DFAs. Example below includes the False Bay nature reserve where land invasions have resulted in vulnerable communities living within landfill buffer zone.	Requires operational maintenance and enforcement to ensure a compact city and facilitate long term sustainability (i.e. climate change mitigation and adaptation, national conservation targets). Examples noted below include the Wolfgat and False Bay nature reserves.	Within the 3-5 year MTREF	Within 5-10 year IDP and DSDF Lifespan	'Urban restructuring' /highest potential transformative impact	Service Delivery/Built Environment/Socio-economic Need and Vulnerability	Coastal, Natural or Urban Special Places or Potential Destination Place	Areas with critical environmental significance (in terms of national conservation targets) and consolidation potential outside of formally protected areas not aligned with DFAs and USAs, preferably state-owned (i.e. municipal, provincial, national). <i>Please refer to Sheet 2 for criteria to consider.</i>	Final Selection	Justification / notes / other
Blaauwberg	Protected Areas Expansion Programme			X	X					New demarcation required	X	Corridor connecting Table Bay Nature Reserve to Blaauwberg Nature Reserve
KMPGBD	Wolfgat Nature Reserve			X		X			X		X	Land invasions threatens loss of proclaimed protected area.
Cape Flats	False Bay Nature Reserve Slangetjebos section		X	X		X		Seawinds/Vrygrond			X	Land Invasion extension of Seawinds/Vrygrond USA. Health risk in Coastal Park Landfill buffer zone.
Table Bay	Adderly Street Fountain Precinct	X			X		CBD			X	X	Project in conceptual design. Project a LUW demonstration project, link to Water Sensitive City. Intention to use as a space for education, and highlight water. Potential future destination place. Could assist with potential of the CBD, as potentially place making, would help with urban heat, given proposed landscaping and water.
Table Bay	Trafalgar Park LUW project	X			X		Woodstock				X	Funding to be determined. Will add value to improving the area. About daylighting water, possible climate education possibilities too. LUW demonstration project. Also park of heritage value.

TECHNICAL ANNEXURE 11: LAND USE MODEL 2040 KEY ASSUMPTIONS

11.1. Land Use Model 2040 Key Assumptions:

The purpose of the model is to establish the foundation for long-term (20-year) engineering infrastructure master plan review and associated sector plans to support the implementation of the 2018-Council-approved Municipal Spatial Development Framework (MSDF). The project is a revision of the previous Land Use Model (2013-2032)

The primary informants of the model are:

- The projected demographic growth, estimated to be in the region of 1.7 million additional persons residing within the city of Cape Town at 2040; and
- The inward growth trajectory principles associated with the approved Municipal Spatial Development Framework (MSDF), 2018.

There are two distinct phases within the land use modeling.

- Phase 1 established a credible and evidence-based “base model” i.e. a spatial representation of land use and intensity across the city (2018).
- Phase 2 considers the future spatial allocation of land use and requires a number of assumptions and calculations in order to allocate land use to accommodate the projected population growth i.e. matching people to land uses via “future growth control totals”.

Both phases have utilised residential and non-residential reference groups informed by internal departments. In the case of the non-residential reference group, this included external property experts.

Summary of Phase 1: base model land use informants are illustrated in the table below:

Category	Estimate
2019 Population	4,488,546
2018 Residential Dwellings Units (all) ²	1,401,368
2018 Estimated m ² GLA Non-Residential land use	49,948,051

² Dwellings were estimated using the latest available (2018/2019) formal and informal dwelling data.

Summary of Phase 2: “future growth control totals” informing the LUM’s spatial allocation of land use for 2040 is reflected below:

Category	Unit of Measure	Estimate	
		2013 2032	2020 2040
Population (additional)	Number of people	1,670,000	1,752,000 ³
Residential Dwellings / Households ⁴	Formal and informal, including additional dwelling informal (ADI) ⁵	553,000	590,000
Non-Residential			
Retail	Gross Letable Area (GLA) in m ²	1,000,000	1,008,000
Office		3,500,000	1,420,000
Industrial		4,500,000	3,650,000

Phase 1 – Land Use Status Quo: Assumptions:

- None. Latest available data was used.

Phase 2 – Future Growth Control totals:

The following aspects inform the additional growth in the residential and non-residential land use categories associated with “additional units of Gross Letable Area (GLA).

Phase 2 represents the “unknowns” of the model and is, therefore, informed by principles and consensus regarding anticipated future trends.

11.2. Methodological approach

Nature of growth / supply: The growth is split between formal and informal supply. The City will not be able to “build its way out of” the growth anticipated. The informal nature of 50% of the growth/supply has implications for service delivery, norms and standards and financial sustainability of the city (implications for the long-term financial plan).

Household size and allocation: each dwelling unit represents a single household. Although, the Census trends indicate that household sizes are decreasing across all households and residential markets, a crude assumption was considered in the light

³ Population projections 2017-2040, CCT (2018): total population projection 2040 = 5,8million

⁴ There is an assumption that each dwelling unit represents a single household.

⁵ Accurate, updated information on the number and location of additional informal dwellings (previously referred to as ‘backyards’) remains a challenge.

of the current pandemic crisis that the household size would remain constant. The preliminary assumption was where people are not able to afford units, people may need to rely on living together, thereby assuming a constant, not decreasing, average household size.

Housing demand: does not take housing “backlogs” into consideration. In addition, the 2018 income segmentation is held constant. The projected dwelling unit growth by market segmentation suggests that the demand in subsidy and gap housing markets are significantly higher than the demand in bonded housing.

Residential Land Use Categories / Dwelling Types:

Four dwelling unit classifications were considered. The classifications, assumptions and residential projections are outlined in the table below.

Dwelling Type	Assumption Notes	2020-2040 Totals ⁶	2020-2040 (%)
Formal dwelling	- The historical growth trend shows formal dwellings increasing at a more rapid pace. However, taking the COVID-19 pandemic and the economic impact into consideration, an assumption was considered that a flat line growth of 14 097 dwellings per annum is more realistic. Formal residential growth is expected to be highly impacted as the property and construction industry is expected to contract. - Baseline was sourced from the residential buildings completed.⁷	208,053	35.4%
Additional dwelling formal (ADF)	- ADF is a subset of formal dwelling. - Represent student or granny flats or additional units which were constructed with brick and mortar on single residential erven and fulfill a dual living need (2 or more families per erf). - Baseline of 45 661 additional formal units⁸ determined using the 2018 General Valuation Roll. - It was assumed that the growth of the additional dwelling formal will mimic the growth of formal main dwellings, i.e. flat line growth. - The average annual growth of 4 189 units of number of additional formal dwellings was used to project the ADF growth (sourced from Development Application Management System (DAMS) from 2015 to 2019).	87,973	15%

⁶ These trends at each respective growth per unit were projected to develop the total of 587 405 du over the 20-year period 2020 to 2040 (also aligned to type of du and income).

⁷ (Stats SA, 2020) and WCG (Human Settlements Annual Reports 2011/12 to 2018/19).

⁸ Assumes each additional dwelling formal has one household.

Informal dwelling	• Informal dwelling unit growth was developed from projecting the baseline at the median growth of 4.21% per annum (which was calculated from the growth of actual counts of informal dwelling units from 2011 to 2019) ⁹. • Assumption¹⁰ that this growth rate will decrease at an average of 5% per annum. • Baseline was sourced from actual counts of Areas of Informality counts of 229 918 as at January 2019 and projected to increase to around 397 216 in 2040 (7 967 dwelling units per annum increase). • Informal dwelling growth is expected to show front loading initially and then taper off as these units are replaced by subsidy and gap housing, and Additional Dwellings Informal (ADI) where access to basic services and employment opportunities are higher.	167,298	28,5%
Additional dwelling informal (ADI) <i>(previously referred to as backyarder units constructed out of temporary materials)</i>	• Additional dwelling informal unit growth was projected at the average of 2.1% growth per annum, using the 2012 to 2018 General Household Survey 2018 data. • Baseline of ADI units was determined using an integrated base 2015 data from various City sources and the 2017/2018 Backyard Information project. • ADI unit growth is expected to increase over time by an average of 5 909 dwelling units per annum and is likely to fill the formal supply gap in providing affordable, appropriate and dignified housing solutions, with improved rental housing stock.	124,081	21,1%

Non-Residential Land Use

Three broad land-use classifications were considered. The classifications and assumptions for the non-residential projections are outlined in the table below:

Dwelling Type	Assumption Notes	2020 - 2040 Totals (GFA)
Retail	• Trends suggested that 40% of growth has been within established industrial and office nodes (policy implication and should, in future, be informed by the nodal hierarchy work within the District Plan Review). • Retail a sector under pressure PRIOR to COVID and sales year on year <4% per annum. • Estimated 20% "drop-off": impact of e-retailing disruption to retail sector.	1,008,000

⁹ Informal settlement roof counts, Informal Settlements Department, City of Cape Town.

¹⁰ The rate is expected to decrease, as informal settlements are aimed to be replaced by low cost housing and additional dwelling informal where access to basic services and employment opportunities are higher.

Office	• Estimated 20% "drop-off": impact of permanent Work from Home disruption to office market. • Would need to consider emerging trends in the market segments e.g. increasing trend in favour of decentralised office space (from traditional CBD;	1,420,000
Industrial	• Cycle would infer a "drop" – in any event, in spite of COVID	3,650,000

Generic Non-Residential-Based Assumptions:

- The global, national and regional economic performance (current and forecast) will be major informant of local potential and growth – and the forecast is not good!¹¹
- Historic trendlines (7 years of flat-lined growth) are less useful now given the COVID-10 impacts and technical recession as major generational disruptors.
- Low growth scenario figures were used in calibrating projections – Business as Usual and Low Growth assessments were considered but estimated GFA base on Low Growth scenario.
- Estimates of future demand are based on anticipated changes in the local population, consumer spending, and disruptors – considered in the table below:

Disruptor	Key Points	Potential impact on future Land Use Demand [inferences made from trends]
Fourth Industrial Revolution	• Increased technological advancement/automation • Artificial Intelligence, Internet of Things • Sharing Economy • Online staffing • Peer-to-peer accommodation • Music and video streaming	• Less demand for manufacturing floor space (technological advances) • Less demand for office space (AI) • Less demand for hospitality (Air bnb) • Less demand for retail due to streaming services • Greater demand for warehousing space (servers, e-tailing) and BPO space (support services) • Less demand for agricultural space
Remote Working	• Competition for talent/skills • Company cost-cutting measures • COVID-19 lockdown may entrench remote working in more sectors	• Less demand for office space • Greater demand for co-working office space
Rapid Urbanisation	• Increased densification/congestion • African population growth with high levels of African and domestic migration into Cape Town	• Greater demand: ○ housing and services ○ mixed use buildings ○ retail space • Lower demand per employee for office space

¹¹ Bureau of Economic Research University of Stellenbosch - 2020 Real GDP Projections for 2020 -9,5%; 2021 3,1%; 6-yr average 2019-2024 -1,7%

Climate Change and Resource Scarcity	• De-materialisation • Environmental Awareness • Water scarcity • Electricity supply challenges	• Lower demand for retail space • Greater demand manufacturing (green) in Cape Town • Greater demand for renewable energy generation
Regulatory Environment	• Land reform • Inclusionary housing	• Lower demand for agricultural or manufacturing Land Uses • Lower demand for new developments

TECHNICAL ANNEXURE 12: IMPLEMENTATION MECHANISMS

DRAFT BASELINE REPORT

12.1. Introduction

The District Spatial Development Framework (DSDF) is a medium term plan (developed on a 10 year planning frame) that will guide urban development within the 8 districts of Cape Town. A key objective of the DSDF is to provide clear direction to the form, type and location of new urban development in the district. In parallel the City is developing a recovery plan for Cape Town's economy during and post the COVID-19 pandemic, focusing on ways to enable and facilitate growth in all sectors of the economy.

The purpose of this report is to research, identify, evaluate and recommend implementation tools that can detail the broad proposals of both the DSDF and Recovery Plan and action them in support of Cape Town's economy.

12.2. Problem Statement

There is a long standing misalignment between the City's proposed spatial planning policy directives and private sector led development. The lack of incentives and tools to stimulate the desired type and form of development proposed in the spatial planning policy needed to rehabilitate the disproportionate urban investment that resulted from Apartheid era planning initiatives continue to hamper spatial transformation.

While the full impact and long term consequences of COVID-19, the economic recession, climate change and uncertainty regarding concepts of 'the new normal' remain unclear, broad trends, globally and within Cape Town have become apparent. The impact to various economic sectors differs but sustained or increased unemployment and fiscal constraints are expected. Recession and declines in spending will likely see the collapse of numerous businesses. While there has been a rise of e-commerce and direct-to-consumer business opportunities, brick and mortar retail outlets face dwindling consumer numbers. Remote work and more flexible working patterns are expected to continue for the foreseeable future. These trends have seen an increasing reliance on internet based services. They will likely have an impact on the demand for office space and will likely have broader impacts on the commercial sector as a whole. Spatial implications of this could see a reduction of the primacy of central business districts, with the retail and service sector in residential areas benefiting and further increases to the residential component of the CBD.

These challenges call for a renewed focus on integrated planning around economies, mobility networks, infrastructure and food networks. This also necessitates reviewing the role of the informal economy as an important safety net for those who need to find livelihoods outside of the formal economy, which is especially true in the South African context. Globally, emerging trends regarding the localisation of economies

and interaction patterns re-emphasises the neighbourhood/community scale as an important focus.

12.3. Development targets

The mechanisms investigated in this report will specifically focus on enhancing or supporting sustainable forms of property development linked to various sectors in the economy. Specific property development proposals in DSDFs are currently being refined, each district will include proposals for the following types of development depicted in Figure 9 below.

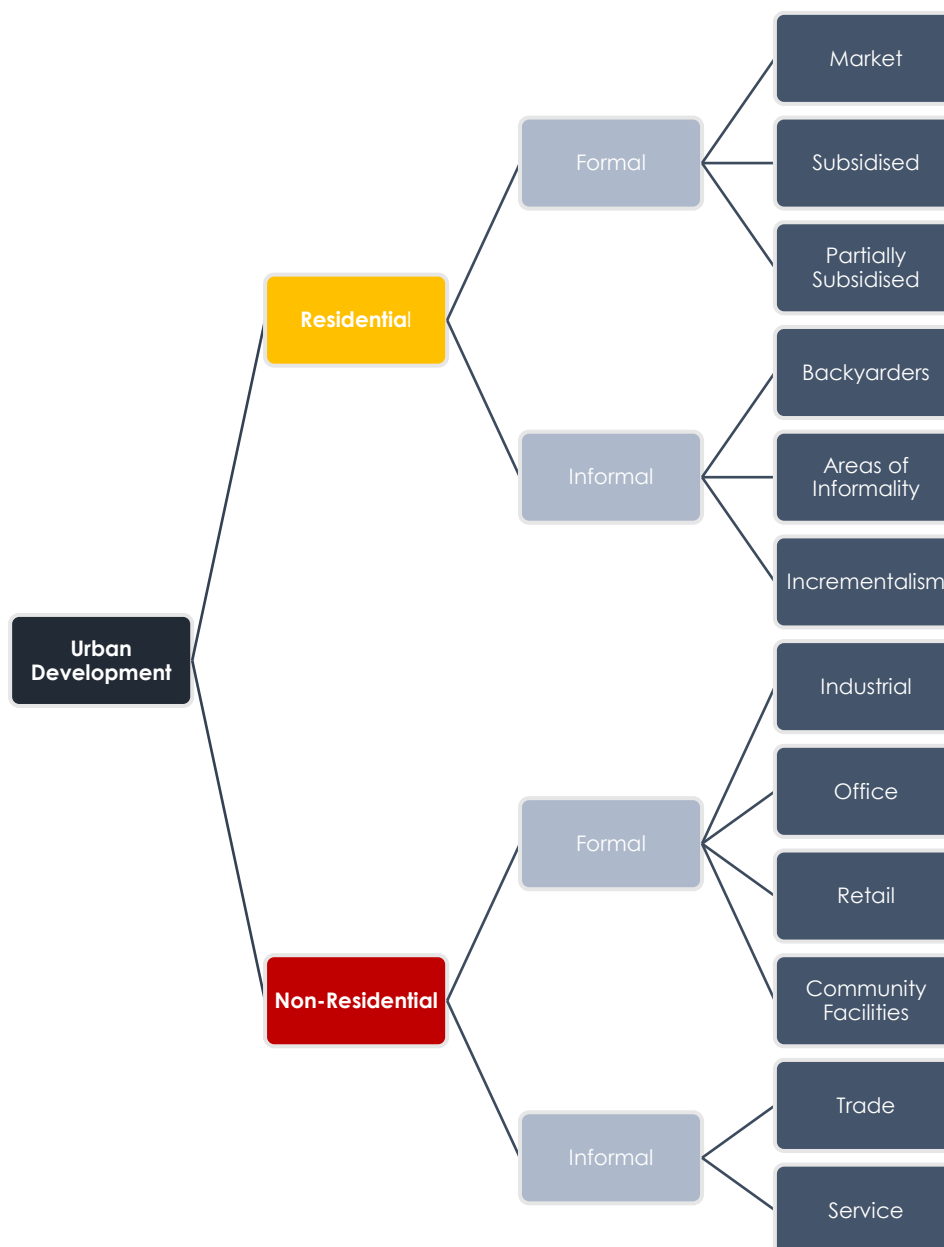


Figure 9: Types of Property Development

12.4. Objectives

1. Identify pragmatic mechanisms that can be implemented within the lifespan of DSDF and support the immediate recovery of the city's economy.
2. To develop a framework to guide the application of the mechanisms at the sub-district and local scale.
3. To develop a monitoring and evaluation tool to monitor the implementation of the DSDF proposals.

12.5. Methodology

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

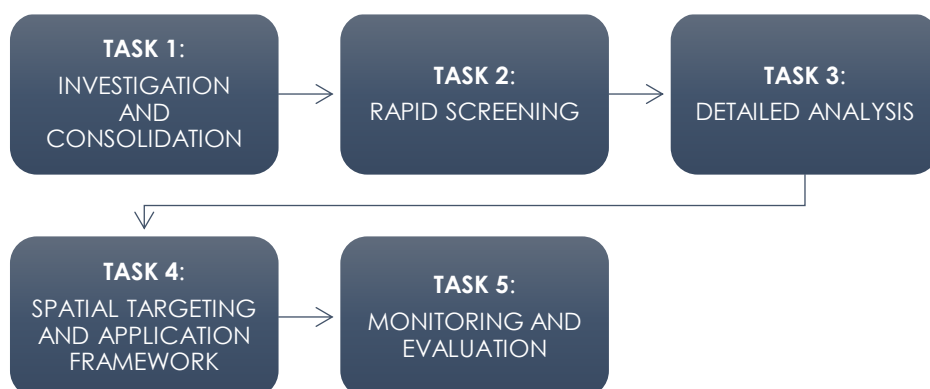


Figure 10: Key Tasks

Task 1: Investigation and Consolidation

The purpose of this task is to identify a list of existing and potential mechanisms through the investigation and consolidation of existing research and policy in the City.

Task 2: Rapid Screening

Based on the findings in Task 1, the list of mechanisms will undergo a rapid screening assessment to determine which can be implemented within short to medium term (5 to 10-year period).

Task 3: Detailed Analysis

Each mechanism that is found to be eligible through the rapid screening criteria will undergo a more detailed analysis to determine the following:

- a. How it works
- b. What are the costs associated with its use
- c. Conditions under which it can be used
- d. Advantages and disadvantages
- e. Case study and/or lessons learnt

Task 4: Spatial Targeting and Application Framework

Development of a spatial targeting tool and framework for applying mechanisms at the local scale, taking into account:

1. Locational Potential
2. Market Performance

Task 5: Monitoring and Evaluation

Development of a monitoring tool to track the implementation of the DSDFs, and measure success and failure during the 5-10-year tenure of the framework.

12.6. Investigation and Consolidation

12.6.1. CURRENT POLICY

a) ECAMP (Economic Areas Management Programme)

This spatial targeted market intelligence tools contained a number of mechanisms and incentives to stimulate positive market responses for commercial development at different stages of the property cycle. Standard incentive packages can involve financial rewards such as discounts, leveraging of city's property assets, rebates, tax holidays and subsidies or they may involve non-financial inducements in the form of exemptions from certain regulation or reporting standards

b) Transit Oriented Development Spatial Framework (TODSF)

The TODSF sets out a framework for guiding targeted densification and mixed use development of a number of key transport nodes within the City. This is to achieve a more sustainable and efficient urban form and movement system, and it involves a number of initiatives, tools and mechanisms to institutionalise this approach to urban development.

c) Investment Incentives Policy

The Investment Incentives Policy aims to attract job-creating investment into Cape Town's economy with a specific focus on making it a preferred business destination. The Investment Incentives Policy will assist and guide the City in managing incentive related activities in an efficient and effective manner so that the desired outcomes can be achieved. The purpose of the Investment Incentives Policy is not to develop a package of subsidies to support unsustainable business models but rather to encourage investment in job-creating enterprises. Furthermore, the Investment Incentives Policy will assist in the targeting of desirable investment in particular spatial locations that require intervention and that can at the same time contribute to improved urban efficiency in terms of the movement of people and goods.

12.6.2. CATEGORISATION OF MECHANISMS

Each mechanism is categorised in terms of their primary objective in supporting the spatial vision and development proposals in line with Spatial Planning Policy. Whilst some may have more than one function, this categorisation focuses on their primary objective. The five categories of mechanisms are described below:

a) Income Generation

Income generation mechanisms enables the City to recover some or all of the value that public infrastructure generates for the private sector and ensure that it retains the maximum value of its assets when leased or disposed to the private sector. The revenue or income generated by these mechanisms can be used to fund the capital and operation cost of public investment projects required to support spatial vision of the City. However, there are challenges regarding the ring-fencing of funds which need investigated with the Finance directorate. It should be noted that this does not exclusively deal with land based financing, rather mechanisms that has a primary objective of generating income.

b) Development Incentives

Development incentive mechanisms aim to stimulate private sector development and leverage public investment in a way the enables the city's development vision contained in spatial planning policy (i.e. using city owned land to incentivise affordable housing or TOD to support its transit investment). They are designed to change the behaviour of agents of the development process or influence their decisions in order to achieve specific outcomes. Incentives must be restricted to agents who meet given criteria such as locating in a TOD precinct and meeting the desired form and composition of land use. Standard incentive packages can involve financial rewards such as discounts, leveraging of city's property assets, rebates, tax holidays and subsidies or they may involve non-financial inducements in the form of exemptions from certain regulation or reporting standards.

c) Institutional

Institutional mechanisms seek to harness the City's operational and legislative capacity as a means of improving the development process. A core facet of this is by identifying and leveraging operational efficiencies as means of improving the implementation of other mechanisms. Institutional mechanisms may also seek to improve vertical and horizontal coherence across government levels as spatial frameworks are aligned with both future and existing local policies, but also across government spheres. While these are typically undertaken within the internal realm of the City, there can be a degree of public-private interfacing as is the case with mechanisms such as City Improvement Districts (CIDs). These are not typically revenue-generating or incentivised approaches.

d) Public Sector Investment

Public investment is a key driver of development within cities across South Africa. Beyond the constitutionally mandated basic services and public infrastructure provision, in certain circumstances **public sector investment is essential** to attracting and leveraging private sector and household investment and unlocking development opportunities in spaces that will contribute to a more efficient, equitable, sustainable and just spatial urban form. These mechanisms are particularly important in areas that face sustained challenges. No developer or investor will elect to build in an undesirable location unless it yields a profitable return on investment or is compensated for its underperformance. Programmes such as MURP and the Precinct Management Model aim to stabilise and address urban decay issues in specific local areas. The CLDP aims to leverage public investment in a long term, comprehensive regeneration process.

e) Development Controls and Dis-incentives

Policy or mechanisms to discourage development in locations that conflict with spatial planning policy. They are designed to curb sprawling development patterns and unsustainable development. These could include increased development contributions, parking levies and planning restrictions (such as an urban edge or a restrictive overlay).

12.6.3. KEY FINDINGS

a) Income Generation

Development Charges – A fee that is imposed by a local government on a new development project to pay for all or a portion of the costs of providing public services to the new development. Fees are imposed upfront as a one-time charge. Requires legislative or policy framework to be in place and staff to administer, negotiate & collect fees.

Tax Increment Financing – TIF enables local government to borrow against future anticipated incremental tax revenues to be generated within a specific geographic area as a result of construction of large-scale improvements. Current property tax revenues when TIF created become the baseline. Additional property tax revenues are deemed the “increment” & captured into a dedicated account. Increment captured for a certain period of time – 10 years or longer – until the identified financing gap associated with the project has been satisfied. Typically, City issues TIF bond, either directly to the public market or by privately placing the bonds directly to investors.

Sale of Development Rights - In an area targeted for redevelopment and where the municipality would like to encourage dense development – provide density bonus (above limits of land use regulations) for a fee. Proceeds from sale of development

rights can be used to fund construction and operational costs of infrastructure or public improvements. Requires a well-designed regulatory framework and enforcement capacity.

TOD redevelopment scheme in an urbanized area – Involves landowners and developer joining together to form one cooperative entity that consolidates multiple land parcels into a single site for redevelopment. Local government modifies zoning codes and increases bulk to facilitate development.

TOD land readjustment on the urban fringe – Landowners pool their land together for reconfiguration and contribute a portion of their land for sale to raise funds to partially fund public infrastructure costs. Can be undertaken by either public or private entity.

Inclusionary Housing – Inclusionary housing is one of many different kinds of housing delivery programs. It is usually a government driven program to promote mixed-income housing delivery through regulations and/or incentives that require or encourage property developers to include a proportion of housing units for low and moderate income households.

b) Development Incentives

PT Zones - PT1 and PT2 zones (short for public transport zones) offer reduced off-street parking requirements for developments in areas already well-served by public transport, in order to encourage the reduction in the number of private transport trips generated to and from that area, as well as to encourage the intensification of land development on the relevant even.

Legislated Exemption Areas - These could include environmental or heritage exemption areas. For example, updating the Environmental Management Frameworks per District to identify areas for exclusion from the requirement to apply for authorisation of specific listed activities as contained in the Environmental Impact Assessment Regulations. Heritage exemptions are provided for in the general protections of the NHRA and areas are identified for investigation for application for exemption of the requirement of S34 and S38.

Overlay Zones - Is a regulatory tool that refers to a zoning, in addition to the base zoning, stipulating the purposes for which land may be used and the development rule which may be more or less restrictive than the base zoning.

Density bonus - Zoning tool that permits developers to increase height and/or bulk above those permitted in terms of the zoning scheme, in exchange for a public or social good. Intended to compensate the developer with additional revenue from sale of additional dwellings to make up for inclusion of below-market units or unprofitable amenities. This tool does not generate direct revenue. It is intended as an in-kind payment in exchange for development of a public good.

Scheduled Public Transport Accessibility Overlay (SPTOA) – Is a Zoning tool, the purpose of which is to make provision for additional land use rights to facilitate small and micro enterprises within the Single Residential (SR) 1 and 2 zoned land units within

the designated scheduled public transport accessibility routes. Through the use of this tool, the City will be setting out principles, procedures and guidelines that will enable the City to support SMMEs, entrepreneurs, and innovators with their incubation, establishment, and development. The tool will guide the process through which entrepreneurs and SMMEs can approach the City for support with identifying business incubation facilities, specifically in relation to City immovable property.

State Land Release Processes – Land release processes are the mechanisms for the handing-over of state land for a variety of purposes. Purposes include the supply of affordable housing, local economic development, stimulating urban renewal, or ensuring sustainable land use. This allows the local state to maintain a stable supply of land while balancing a forecasted demand in line with a suitable inventory. Additionally, land release processes are used as a revenue generating mechanism for local authorities.

Urban Development Zones (UDZs) – the UDZ is a National Treasury tax incentive administered by the municipality that aims to address urban decay in South Africa's inner cities by promoting private sector-led investment in commercial and residential developments.

City-owned land disposal or lease – Local government disposes of property and transfers development rights to a private developer for economic development purposes:

- Land for a fee - sale or lease at **market value consideration**
- Land as in-kind payment for infrastructure – MFMA/MATR consideration
- Land as equity for development (Atlantis)

Local government may seek to maximise fair market value of the land or maximise other policy goals (e.g. affordable housing). Municipality & developer negotiate the land disposition deal structure with the goal of aligning public and private interests

The acquisition or release of land by the City is an important mechanism for development purposes. Improving process efficiencies would increase the City's ability to facilitate development either through internal mechanisms or through private entities.

Tax Abatement – A reduction or exemption from taxes granted by government for a specific period, usually to encourage investment in locations with lower demand (e.g. the UDZ in SA). Benefits of the tax abatement get passed onto subsequent owners who purchase the property, thereby incentivising end users to relocate to an area that they may not otherwise locate in. Can be set up in designated neighbourhoods where the city is trying to incentivise development or on project-by-project basis if that project advances certain policy goals e.g. job creation.

Proactive Rezoning/ Upzoning – Proactive rezoning is the process where a municipality, of its own accord, changes the existing zoning of land parcels in its jurisdiction. A municipality may do this for many reasons, but generally the aim is to

encourage development in a specific area and/or to control the nature of that development

c) Public Sector Investment

Mayoral Urban Renewal Programme (MURPs) – this programme aims to uplift areas that have been identified as neglected and dysfunctional through the maintenance of public infrastructure and facilities in order to stabilise areas and provide a platform for more effective public and private investment and management.

Catalytic Land and Development Pipeline (CLDP) – include public municipal, public non-municipal, public-private partnerships and private development projects needing to be implemented within a priority precinct of a specific spatial targeted area to achieve specific strategic objectives.

Special Economic Zone (SEZs) – geographically designated areas of a country set aside for specifically targeted economic activities, supported through special arrangements (that may include laws) and systems that are often different from those that apply in the rest of the country. SEZs are categorized as either Industrial Development Zones, Free Port, Free Trade Zones or Sector Development Zones.

Land Banking and Assembly - Land banking is the practice of purchasing land with the intent to hold onto it until such time as it is useful or profitable to release the land for development purposes. Typically, it is associated with accessing land for public purposes such as for housing, managing land markets and directing land speculation. This implies the state purchasing land cheaply with an identified future use of the land to influence the surrounding pattern of development.

d) Non-Fiscal Incentives

Other non-fiscal incentives: including regulatory and administrative concessions; and subsidised or reduced service costs. For instance, streamlining the land use application process for development proposals in specific areas or in exchange for a public or social good.

12.7. Rapid Screening

This step in the process is to understand the viability of implementing development mechanisms in Cape Town using a rapid screening approach to narrow the scope for the detailed analysis. This approach will investigate potential development mechanisms based on literature and approved policy documentation in the City, and evaluate, at a high level, their ability to be implemented by the City using the criteria described below.

12.7.1. CRITERIA

Each mechanism is evaluated based on the following four criteria:

- A. MARKET SENSITIVITY:** the level of sensitivity the mechanism is to market conditions and the ability of the mechanism to stimulate or incentivise positive market conditions. To this end the following questions were asked:
 - How sensitive is the tool to market conditions?
 - Are local market conditions conducive to the use of this tool?

- B. TIMEFRAMES TO IMPLEMENT:** The length of time required to implement or make use of the mechanisms. Ideally the aim of this task is to prioritise mechanisms for the DSDF and Recovery Plan in the short and medium term to support urban development in sustainable locations in Cape Town. To this end the following questions were asked:
 - How long will it take to put into place or will the implementation or use of this mechanisms require significant policy changes, public participation, etc.?
 - Are there any processes currently in place to regularise the use of this mechanisms?

- C. COST / RISK TO CITY:** the potential negative impact of the mechanism to city and its residents. This could include and financial, environmental or social risks. To this end we asked the following questions:
 - What are the risks?
 - Can the risk be easily prevented or mitigated?

- D. CITY'S CAPACITY TO IMPLEMENT:** to determine if the mechanism can be embedded or accommodated within the City's current administrative processes. To this end we asked the following questions:
 - Can the mechanism be implemented and managed by current City line departments or branches?
 - Does the mechanism require external management?

12.7.2. SCORING METHOD:

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

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

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

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

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

Table 15: Scoring Matrix

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

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

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

Three ranges of scoring are used to evaluate the individual scores of each mechanism – see cumulative score guide in Table 15 above. Those receiving a score between 4 to 6 are deemed to have a low implementation potential. Scoring of 7 to 9 are considered in the mid-range, and those scoring between 10 to 12 have the highest potential of effective implementation.

12.7.3. RAPID SCREENING OUTPUTS

From the rapid screening process, a number of mechanisms were identified which meet the criteria suitable for the inclusion into the District Plans. The primary criterion for exclusion from this list were those tools whose timeframes fall outside of the 5 – 10-year lifespan of the District SDFs. The mechanism listed below will be taken forward into a detailed analysis, following which appropriate spatial targeting will occur. As mentioned, the rapid screening matrix provides further input into the motivation for the scoring decisions taking. The list of suitable mechanisms are as follows:

Development Incentives

- Discounted Development Charges
- Discounted or Exempted Development Application Fees plan application fees
- Discounted Electricity Tariffs
- PT Zones
- Legislated Exempted Areas
- Incentive Overlay Zones
- Density Bonuses
- Inclusionary Housing Policy
- Scheduled Public Transport Accessibility Overlay (SPTAO) Zone
- Proactive Rezoning/ Upzoning
- Urban Development Zones
- Urban Redevelopment Scheme
- Efficient Land Use Applications
- Small-Scale Rental Unit Incentives
- Tax Abatement

Income Generation

- Impact Fees (Development Charges)
- Land Readjustment Scheme
- City-owned Land Disposals

Institutional

- Streamlined Land Use Applications
- Enhanced Process of Land Release and Acquisition
- Special Rating Areas/City Improvement Districts (CIDs)

Public Sector Investment

- Catalytic Land Development Programme
- Land Acquisition including Land Banking and Assembly
- Precinct Management Model
- Mayoral Urban Regeneration Programmes (MURPs)

12.8. Detailed Analysis

The mechanisms and tools as described in **Section 12** above are those that are seen to have a degree of successful implementation during the timeframe of the District Plans based on the rapid screening analysis, and these were brought forward for a more thorough analysis. The detailed analysis of the above mechanisms took into account a number of factors in order to extend the base methodology applied during the rapid screening phase.

At the outset of the detailed analysis, a quick summary of the Focus Area, Project Types and Goals of the specific mechanism are provided. This is a breakdown of the suitable geographic areas in which the mechanism may apply, the most applicable types of development and the intended outcome of its use.

Following this, the detailed analysis explores the way in which the mechanism works. This is a step by step analysis of the functioning of the mechanism and how it intends to motivate development or investment within the City.

The costs and risks of each mechanism are expanded upon. This would need to go beyond the financial costs associated with the mechanism and consider the costs that could result in the social and environmental spheres as well as potential opportunity costs that are not immediately tangible.

The preconditions for use of each mechanism is included as part of the detailed analysis. Examples of necessary preconditions for successful implementation include appropriate market conditions, availability of land, the cost of land, and the capacity of the municipality to manage mechanisms from an institutional process standpoint.

In addition to the requisite preconditions for the use of the mechanism, the timing of the mechanisms is also necessary to explore. This refers to the time at which the mechanism is triggered i.e. before or after development, or when to remove the mechanism.

In cases where a mechanism has not yet been approved, a description of the process to approve the mechanism was defined with a timeline to ensure that the approval can be done within the time period of the DSDFs. In addition, a description of how an applicant would apply for the mechanism is also included in this section of the detailed analysis.

If applicable, a case study of the use of a mechanism would also be inserted to display its use in pragmatic terms. This section also provided an opportunity to explore the shortcomings of mechanisms to indicate the potential for improvements in their intended use.

Lastly, the detailed analysis provides a section for the geographic targeting of the mechanisms using the relevant mapping resources. This should guide planners and development practitioners as to the specific areas in which investment incentives and implementation mechanisms apply.

12.8.1 AVAILABLE MECHANISMS

The mechanisms described in this section are approved and available to the City, prospective development agents and property owners in Cape Town (the table below provides a road map to various policies or legislation that permits the use of said mechanisms).

Table 16: Available mechanisms and Policy Reference

Mechanism	Policy Reference
DEVELOPMENT INCENTIVES	
Discounted Development Contributions	City of Cape Town Investment Incentives Policy 2018
Development Application Fee Waivers	City of Cape Town Investment Incentives Policy 2018
Discounted Electricity Tariffs	City of Cape Town Investment Incentives Policy 2018
PT Zones	City of Cape Town Municipal Planning By-Law 2015, Parking Policy for the City of Cape Town 2014 S19.1.1 of Cape Town Zoning Scheme 2012
Urban Development Zones (UDZs)	Income Tax Act (No 58 of 1962) Revenues Laws Amendment Act (No 45 of 2003)
INCOME GENERATION	
Development Contributions	Development Charges Policy for Engineering Services for the City of Cape Town 2014
Land Disposals & Lease	Municipal Finance Management Act 2003, Municipal Asset Transfer Regulations 2008, Management of Certain of the City of Cape Town's Immovable Property Policy 2010
INSTITUTIONAL	
Streamlined Land Use Application Process	City of Cape Town Investment Incentives Policy 2018 S. 99 of City of Cape Town Municipal Planning By-Law 2015
Special Rating Areas	Special Rating Area By-Law 2009
PUBLIC SECTOR INVESTMENT	
Catalytic Land Development Pipeline	City of Cape Town IDP National Treasury's Catalytic Land Development Guideline.
Mayoral Urban Regeneration Programme (MURP):	City of Cape Town IDP City of Cape Town Resilience Strategy 2019
Precinct Management Model	City of Cape Town Resilience Strategy 2019
Land Acquisitions and Disposals	Municipal Finance Management Act 2003, Municipal Asset Transfer Regulations 2008, Management of Certain of the City of Cape Town's Immovable Property Policy 2010 Immovable Property Asset Management Policy 2015

12.8.1.1. Development Incentive Mechanisms

Discounted Development Charges (DCs)

Focus Area:

- Manufacturing within 6 defined geographic areas. This includes the broad manufacturing sector OR priority manufacturing sectors being:
 - Agro-processing
 - Green technology
 - Electronics and electrical engineering
 - Clothing and textiles.
- Priority tertiary sector industries are defined by the City's economic research and strategic documents including the Integrated Development Plan, the Social Development Strategy, the Inclusive Economic Growth Strategy and Project Camissa. These industries include:
 - Business Process Outsourcing (BPO),
 - Information and Communication Technology (ICT),
 - Tourism,
 - Film Industry.

Project Type:

- For private development

Goal:

- To attract job-creating investment into Cape Town's economy with a specific focus on making it a preferred business destination.
- Incentivise economic development

a) How it works:

Applies in respect of civil DCs where enhanced development rights are granted

- i) The DC debt will still be calculated and Acknowledgment of Debt (AoD) signed and payable as per normal;
- ii) A maximum of R1 million of the DC owed by the applicant will be deferred for 24 months and written off on verification that employment targets are met for two years after the start of the production process. This incentive does not apply in respect to water related DC's.
- iii) Incentive only valid for 24 months from date of approval of application for investment incentives.
- iv) The incentive will only be available for a specified number of applicants on a 'first come first serve' and a 'use it or lose' it basis.
- v) Subject to National Treasury guidelines as outlined in the Policy Framework for Municipal Development Charges.

b) Costs or Risks

Loss of income to the City as development charges are the most important form of capital contribution raised by the CCT to pay for infrastructure. However, the current Investment Incentives Policy provides framework where this financial mechanism is administered in a targeted and equitable way to ensure that the main beneficiaries of infrastructure make an appropriate and fair contribution to that cost without unduly burdening the city's ratepayers and providing wider economic benefits to the public in the form of job creation.

Each geographic area may be subject to a limitation on the number of businesses that may access the financial incentives. The rationale for this limitation is to provide a mechanism for the active management of the fiscal impact of the financial incentive as well as being able to adapt to shifting development objectives across each geographic area.

c) Preconditions (When to use it)

- i) Targets areas with clear potential for economic growth but which is currently underperforming/lagging. This will be determined by the market potential and performance scores as revealed in the City's Economic Areas Management Programme (ECAMP). However, this is limited to manufacturing and tertiary sectors.
- ii) Financial incentives for manufacturing sector investments are only available in six industrial nodes within the City. These nodes have been selected based on an evaluation of their current performance, long-term growth potential and suitability for incentives. The designation of spatially targeted geographic areas for incentives will be approved by Council from time to time. The areas where the manufacturing sector incentives currently apply are:
 - (a) Atlantis Industria
 - (b) Triangle Farm
 - (c) Parow Industria
 - (d) Sacks Circle
 - (e) Landsdowne Industrial (known as Philippi North in ECAMP)
 - (f) Elsies River
- iii) Priority tertiary sector industries are defined by the City's economic research and strategic documents including the Integrated Development Plan, the Social Development Strategy, the Inclusive Economic Growth Strategy and Project Camissa. These industries include:
 - (g) Business Process Outsourcing (BPO),
 - (h) Information and Communication Technology (ICT),
 - (i) Tourism,
 - (j) Film Industry.

d) Qualifying Criteria

The following criteria must be met in order for investments to qualify for the manufacturing sectors incentives:

- i) The investment must constitute a new investment or expansion of an existing investment in the area, but cannot be a relocation of an existing business or part thereof within the municipal boundaries of Cape Town
- ii) Proposed investment or expansion must be within either the broad manufacturing sector OR priority manufacturing sectors being:
 - (1) Agro-processing
 - (2) Green technology
 - (3) Electronics and electrical engineering
 - (4) Clothing and textiles
- iii) The minimum thresholds to qualify for the incentives are:
 - (1) In the broad manufacturing sector: a minimum of 50 new permanent full time jobs within two years
 - (2) In the priority manufacturing sectors: a minimum of 20 new permanent full time jobs within two years
- iv) The investment or expansion must be located in the spatially areas as approved by Council.

Incentives for investments in tertiary sector industries will be subject to the following criteria:

- i) The investment must constitute a new investment or expansion of an existing investment in the area, and cannot be a relocation of an existing business or part thereof within the municipal boundaries of Cape Town
- ii) The investment must be in one of the City's priority tertiary sector industries as informed by the City's economic research and strategic documents.
- iii) The investment or expansion must create a minimum of 20 new full time jobs within 2 years.
- iv) The strategic or catalytic importance of the investment to Cape Town's economy.
- v) The capital value of investment into Cape Town over a ten-year time horizon must reach a minimum amount of R100 million.
- vi) The investment support for entrepreneurs and SMME's within the sector aligned with the enterprise and supplier development element as described in the Amended Codes of Good Practice

e) Timing

This incentive might change over the lifecycle of an area: The City's ECAMP work has demonstrated that economic areas move through cycles and that different interventions are appropriate at different stages in an areas' lifecycle. This means that an area selected for incentives may lose that Investment Incentives Policy

Final Approved May 2018 status in the future. Conversely, areas not selected initially may be targeted at a later stage as its context and performance changes.

f) Approval and Application process

i) Approval

Approved as part of City's Investment Incentives Policy

ii) Application Process

When an applicant is interested in this incentive or any other incentive offered in the City's Investment Incentive Policy, an initial meeting to be held between the investor and officials from the Investment Facilitation Unit (IFU) for the purpose of clarifying the requirements and scope of the investment incentive scheme and providing any additional information relating to:

- (1) Incentives available,
- (2) Qualifying and performance criteria,
- (3) Information required from the investor,
- (4) the administrative process and timeframes going forward.

Eligibility for the manufacturing sector incentives is based on the qualifying criteria and will be confirmed in an Incentive confirmation letter that will be signed by the Executive Director: Economic Opportunities and Asset Management

Eligibility for tertiary sector development will require approval by Council. Once approved by Council the investor will be informed by the IFU of the outcome in an Incentive confirmation letter that will be signed by the ED. This letter will also list the incentives that the investor is eligible for and any special conditions imposed by Council.

Development Charges (DC) are levied where enhanced land use rights are required. A calculation of the DC contribution required will be made as part of the land use application.

The incentive confirmation letter must accompany the land use application and a calculation of the DC costs will reflect the deferred and non-deferred portions. An AoD (covering the deferred portion) will be signed by the investor prior to the land use decision on the related application. The varied standard AoD and suretyship template will be used for this purpose (Annexure E). Suretyship will only be required where the investor/developer is not the land owner (i.e. leasing the premises).

DC debt would become payable as a once off occurrence. The deferral period is considered a maximum of 24 months from the date of payment of the non-deferred portion of the DC debt. The IFU will record the above date and remind the investor of the compliance requirements two (2) months prior to the expiration of the 24-month deferral period.

The Area Manager: Roads Infrastructure and Management must advise the Revenue department (Head: Debtors Contact Centre) when the payment of the non-deferred

DC debt occurs. Upon receipt of such notice, the Revenue department would record the R1m (or lesser amount as may be the case) as deferred debt in the accounting system with an activation (or call-up) date of 24 months hence. As is the normal practice with outstanding DCs payable, a block will be put on the system by Finance to prevent transfer without settlement of such deferred debt.

In the case of asset ownership change prior to incentive realisation date, the investor having taken up the DC debt incentive and signed the applicable AoD will be required to settle the deferred debt immediately or provide proof that the required number of jobs have been created.

A summary of the application process is depicted in Figure 11 below. Full details can be found in CCT Standard Operational Framework for the Administration of Investment Incentives (2019).

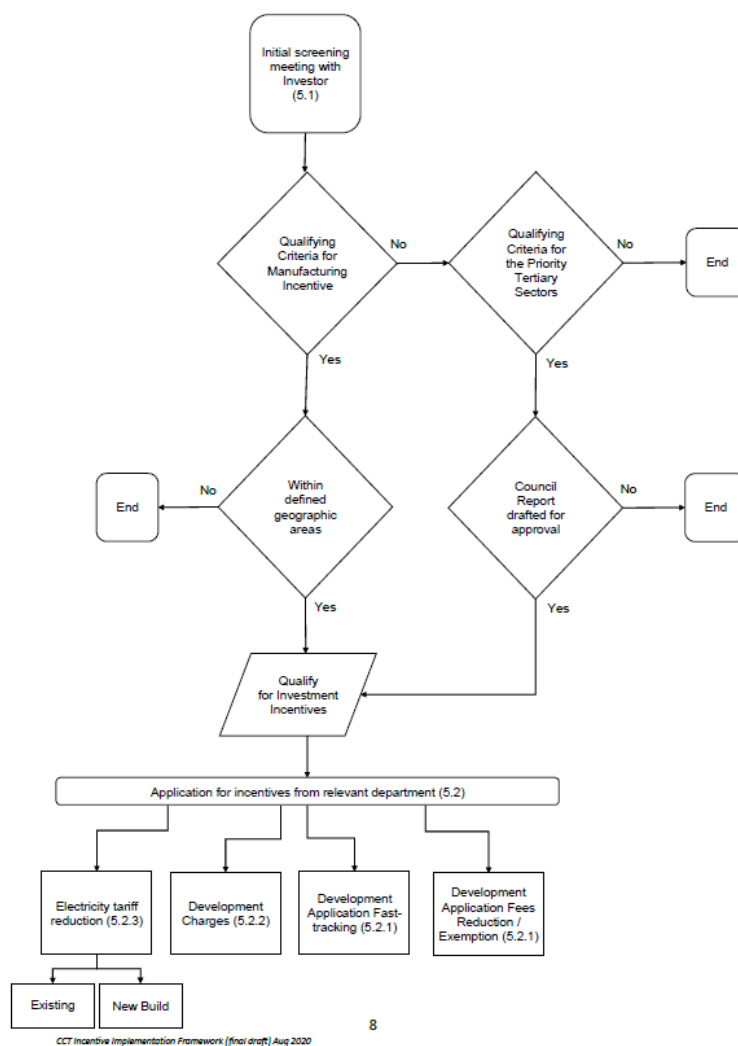


Figure 11: Application Process

g) Advantages and Disadvantages

Advantages	Disadvantages
• Help mitigates financial risk to developer and marginally improves overall project feasibility. • Currently regulated within the City's Investment Incentive Policy	• At the moment this incentive is only applicable to two economic sectors and only six geographic areas in Cape Town. However, this is done to mitigate severe financial risk to the City. •

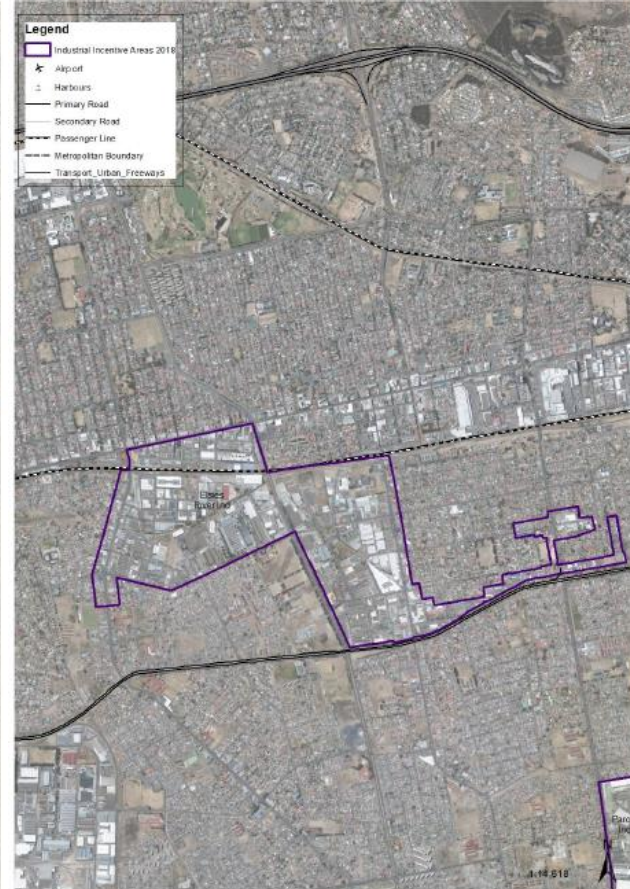
h) Targeted Areas

The following maps defined geographic areas for manufacturing incentives:

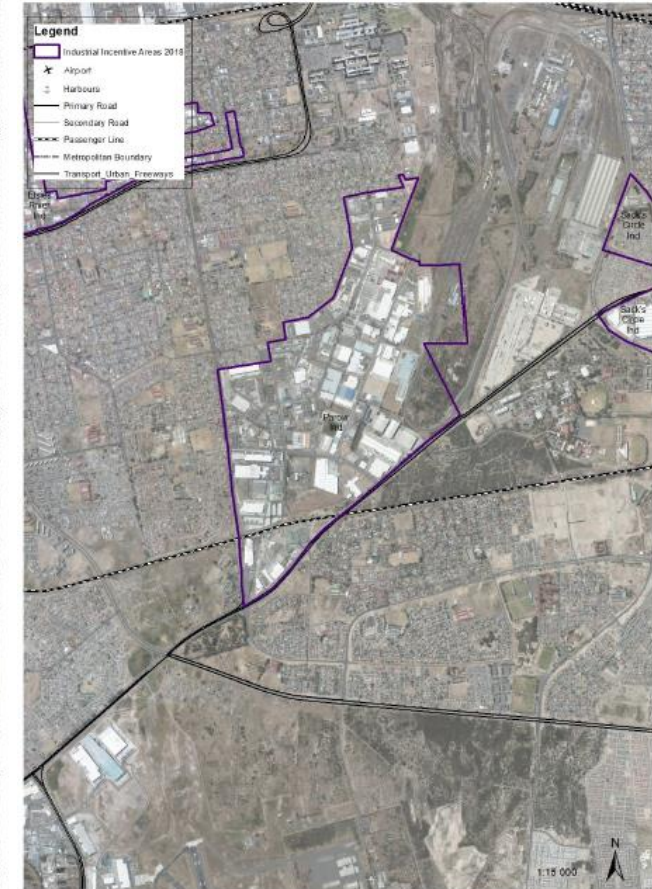
Atlantis Industrial Area



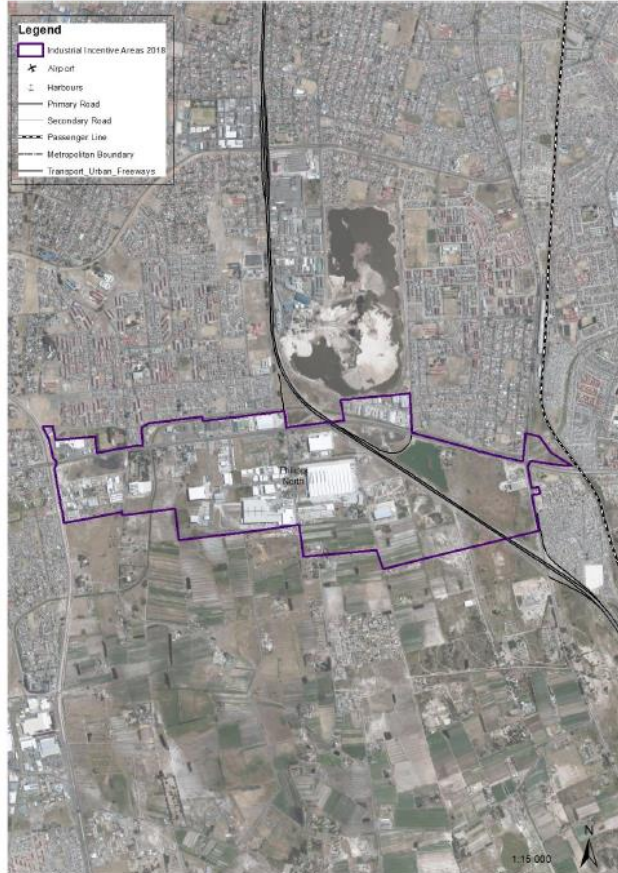
Elsies River



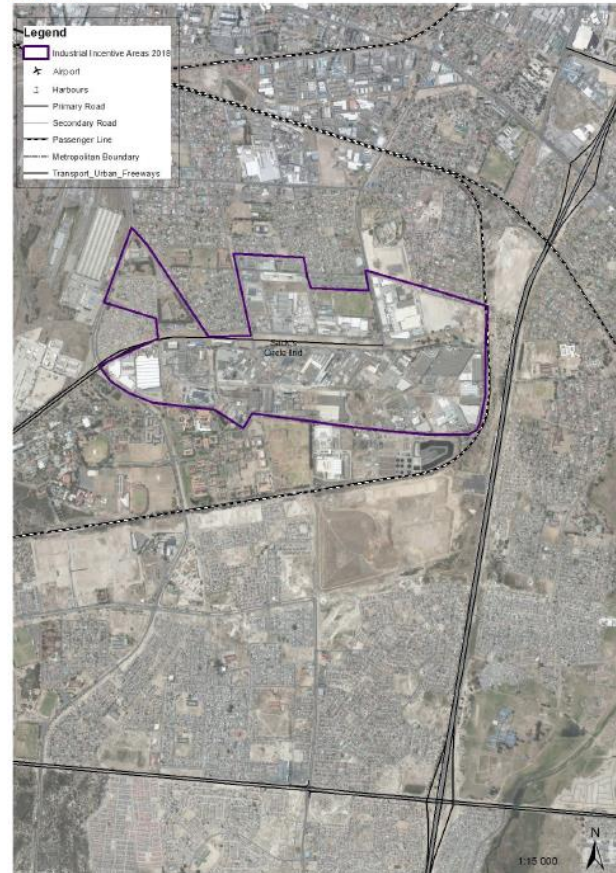
Parow Industria



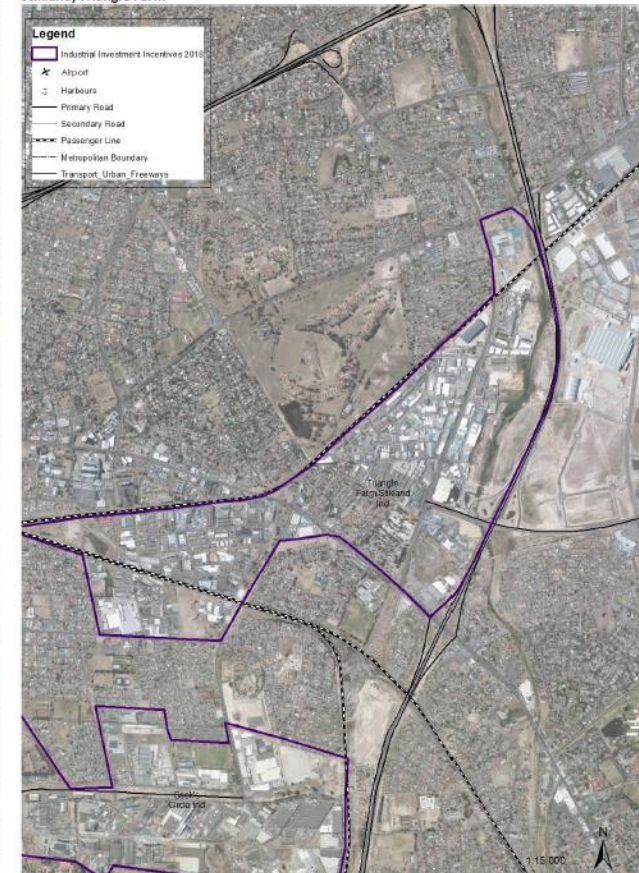
Philippi North



Sacks Circle



Stikland/Triangle Farm



Exemption of Development Application Fees

Focus Area:

- Manufacturing within 6 defined geographic areas. This includes the broad manufacturing sector OR priority manufacturing sectors being:
 - Agro-processing
 - Green technology
 - Electronics and electrical engineering
 - Clothing and textiles.
- Priority tertiary sector industries are defined by the City's economic research and strategic documents including the Integrated Development Plan, the Social Development Strategy, the Inclusive Economic Growth Strategy and Project Camissa. These industries include:
 - Business Process Outsourcing (BPO),
 - Information and Communication Technology (ICT),
 - Tourism,
 - Film Industry.

Project Type:

- For private development

Goal:

- To attract job-creating investment into Cape Town's economy with a specific focus on making it a preferred business destination.
- Incentivise economic development

a) How it works:

Full exemption for both land use and building plan application fees, only in areas designated by Council. This applies to all manufacturing investments in the identified spatial nodes as well as tertiary sector investments approved by Council.

b) Costs or Risks

Loss of income to the City in form of application fees, however the wider economic benefits of employment and additional rates to the city makes up for said loss.

Each geographic area may be subject to a limitation on the number of businesses that may access the financial incentives. The rationale for this limitation is to provide a mechanism for the active management of the fiscal impact of the financial incentive as well as being able to adapt to shifting development objectives across each geographic area.

c) Preconditions (When to use it)

- i) Targets areas with clear potential for economic growth but which is currently underperforming/lagging. This will be determined by the market potential and performance scores as revealed in the City's Economic Areas

Management Programme (ECAMP). However, this is limited to manufacturing and tertiary sectors.

- ii) Financial incentives for manufacturing sector investments are only available in six industrial nodes within the City. These nodes have been selected based on an evaluation of their current performance, long-term growth potential and suitability for incentives. The designation of spatially targeted geographic areas for incentives will be approved by Council from time to time. The areas where the manufacturing sector incentives currently apply are:
 - (k) Atlantis Industria
 - (l) Triangle Farm
 - (m) Parow Industria
 - (n) Sacks Circle
 - (o) Landsdowne Industrial (known as Philippi North in ECAMP)
 - (p) Elsie's River
- iii) Priority tertiary sector industries are defined by the City's economic research and strategic documents including the Integrated Development Plan, the Social Development Strategy, the Inclusive Economic Growth Strategy and Project Camissa. These industries include:
 - (q) Business Process Outsourcing (BPO),
 - (r) Information and Communication Technology (ICT),
 - (s) Tourism,
 - (t) Film Industry.

d) Qualifying Criteria

The following criteria must be met in order for investments to qualify for the manufacturing sectors incentives:

- i) The investment must constitute a new investment or expansion of an existing investment in the area, but cannot be a relocation of an existing business or part thereof within the municipal boundaries of Cape Town
- ii) Proposed investment or expansion must be within either the broad manufacturing sector OR priority manufacturing sectors being:
 - (5) Agro-processing
 - (6) Green technology
 - (7) Electronics and electrical engineering
 - (8) Clothing and textiles
- iii) The minimum thresholds to qualify for the incentives are:
 - (3) In the broad manufacturing sector: a minimum of 50 new permanent full time jobs within two years
 - (4) In the priority manufacturing sectors: a minimum of 20 new permanent full time jobs within two years
- iv) The investment or expansion must be located in the spatially areas as approved by Council.

Incentives for investments in tertiary sector industries will be subject to the following criteria:

- vii) The investment must constitute a new investment or expansion of an existing investment in the area, and cannot be a relocation of an existing business or part thereof within the municipal boundaries of Cape Town
- viii) The investment must be in one of the City's priority tertiary sector industries as informed by the City's economic research and strategic documents.
- ix) The investment or expansion must create a minimum of 20 new full time jobs within 2 years.
- x) The strategic or catalytic importance of the investment to Cape Town's economy.
- xi) The capital value of investment into Cape Town over a ten-year time horizon must reach a minimum amount of R100 million.
- xii) The investment support for entrepreneurs and SMME's within the sector aligned with the enterprise and supplier development element as described in the Amended Codes of Good Practice

e) Timing

This incentive might change over the lifecycle of an area: The City's ECAMP work has demonstrated that economic areas move through cycles and that different interventions are appropriate at different stages in an areas' lifecycle. This means that an area selected for incentives may lose that Investment Incentives Policy Final Approved May 2018 status in the future. Conversely, areas not selected initially may be targeted at a later stage as its context and performance changes.

f) Approval and Application process (where relevant)

i) Approval

Approved as part of City's Investment Incentives Policy

ii) Application Process

When an applicant is interested in this incentive or any other incentive offered in the City's Investment Incentive Policy, an initial meeting to be held between the investor and officials from the Investment Facilitation Unit (IFU) for the purpose of clarifying the requirements and scope of the investment incentive scheme and providing any additional information relating to:

- (5) Incentives available,
- (6) Qualifying and performance criteria,
- (7) Information required from the investor,
- (8) the administrative process and timeframes going forward.

Eligibility for the manufacturing sector incentives is based on the qualifying criteria and will be confirmed in an Incentive confirmation letter that will be signed by the Executive Director: Economic Opportunities and Asset Management

Eligibility for tertiary sector development will require approval by Council. Once approved by Council the investor will be informed by the IFU of the outcome in an Incentive confirmation letter that will be signed by the ED. This letter will also list the incentives that the investor is eligible for and any special conditions imposed by Council.

In order to take up the development application fee waivers and fast tracking incentives the investor will submit their incentive confirmation letter together with their development applications. Both must be submitted electronically via the Development Application Management System (DAMS) portal.

Once submitted the client must alert the IFU who will in turn alert the Customer Interface official and request the waiver of the submission fee¹. Once the fee is waived the application can be processed further within DAMS. The Customer Interface office will keep record of the value of the waived application fees and send this to the E&I Department for quarterly uptake capturing purposes.

A summary of the application process is depicted in Figure 12 below. Full details can be found in CCT Standard Operational Framework for the Administration of Investment Incentives (2019).

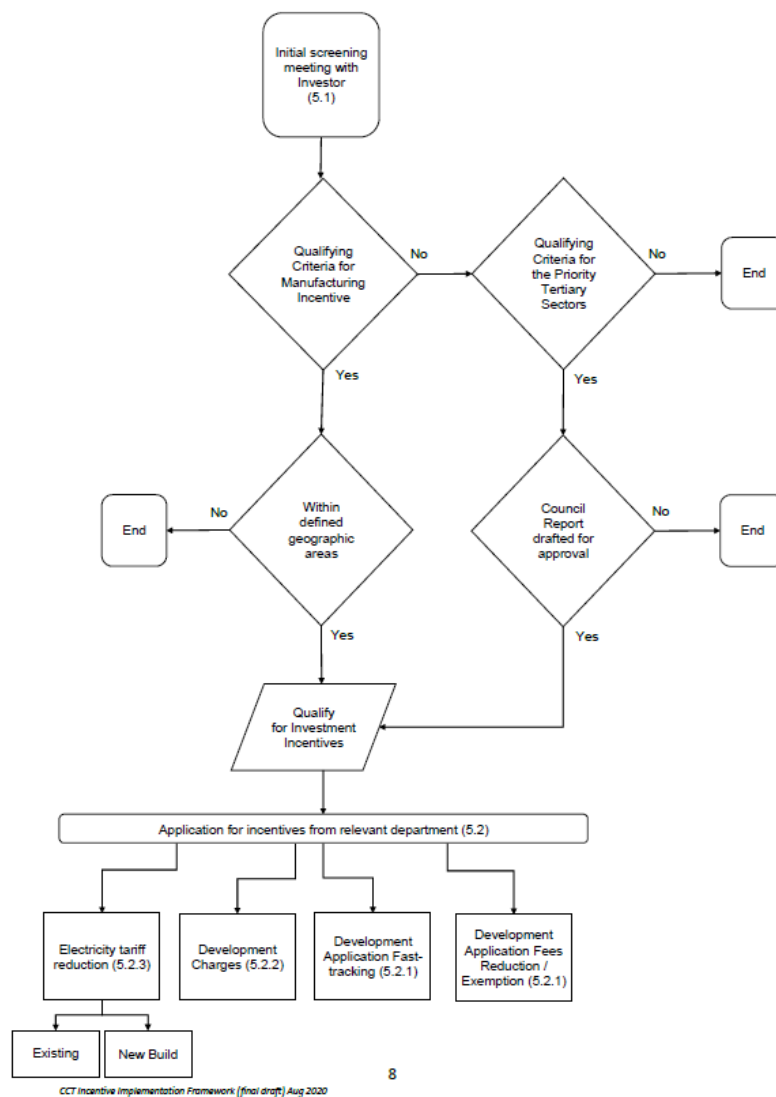


Figure 12 Application Process

g) Advantages and Disadvantages

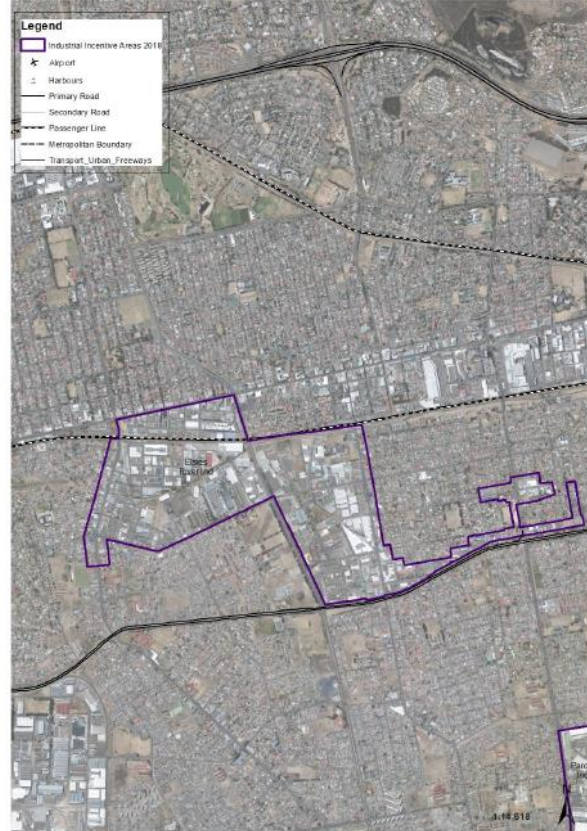
Advantages	Disadvantages
- Help mitigates financial risk to developer and marginally improves overall project feasibility. Compared to all local municipalities building plan fees are above average, but more than double compared to Johannesburg, Pretoria or Durban (commercial office is +- x3 more expensive) (ECAMP, 2013). - Currently regulated within the City's Investment Incentive Policy	- At the moment this incentive is only applicable to two economic sectors and only six geographic areas in Cape Town. However, this is done to mitigate severe financial risk to the City. - According to 2013 SAPOA study, developers did not consider fees relating to EIAs, subdivisions or building plan submissions as a major issue.

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

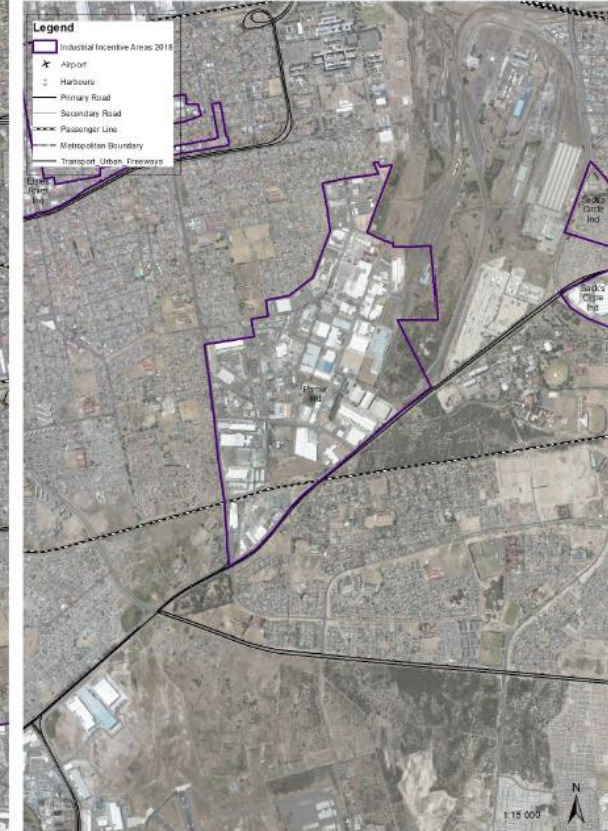
Atlantis Industrial Area



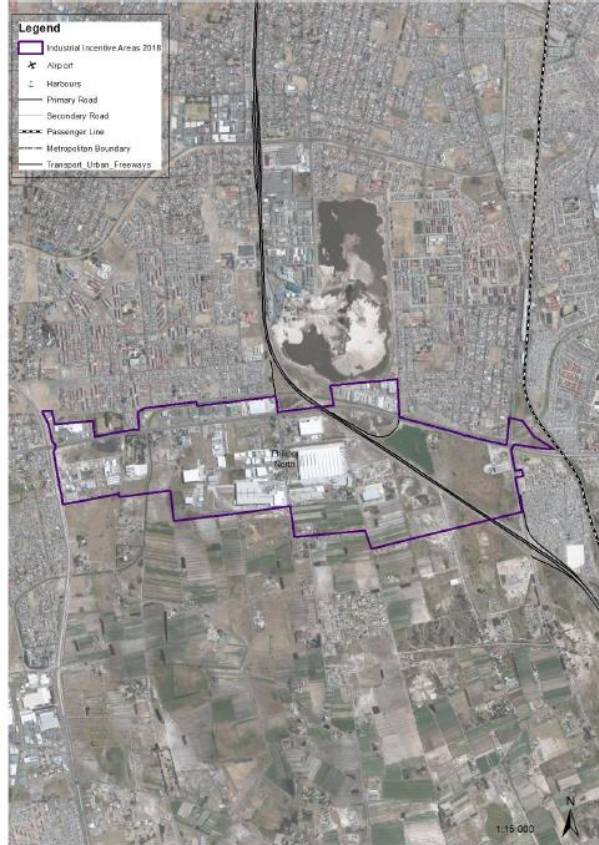
Elsies River



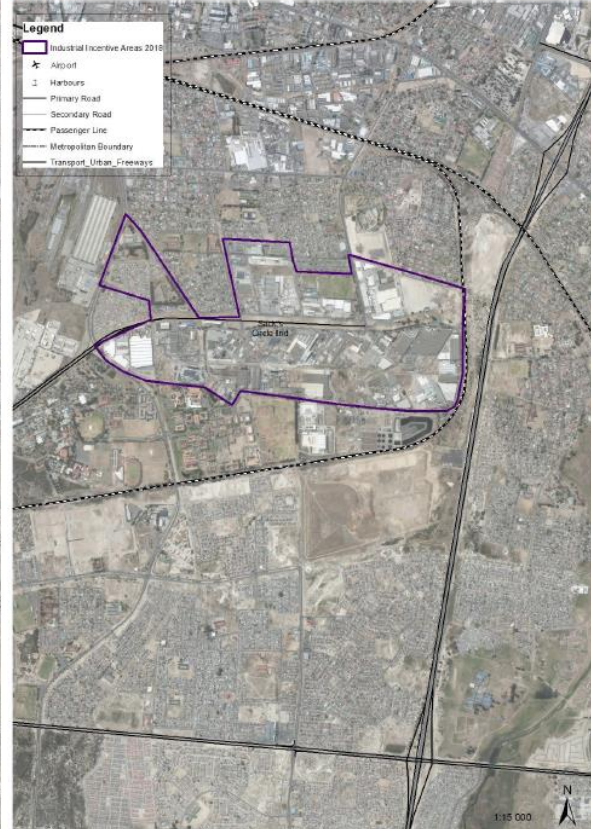
Parow Industria



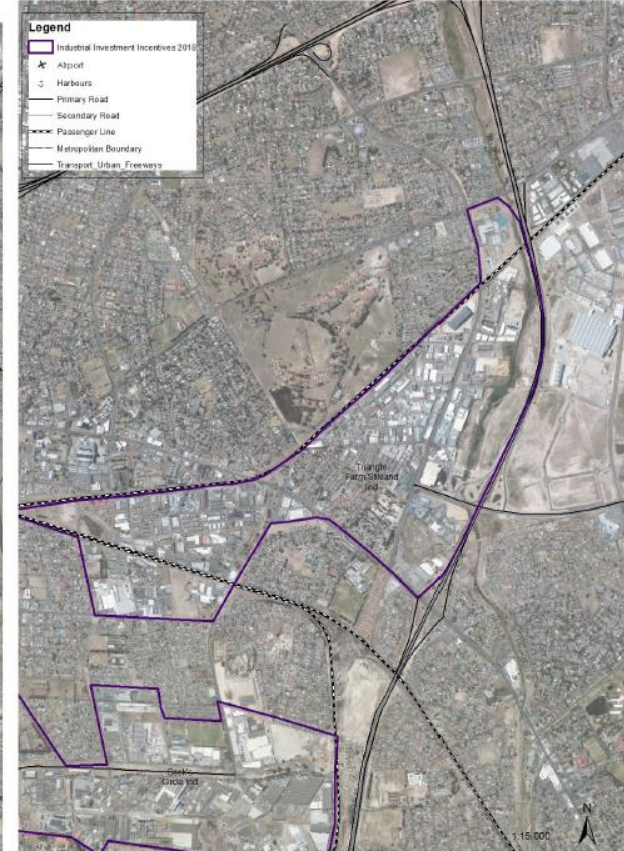
Philippi North



Sacks Circle



Stikland/Triangle Farm



Discounted Electricity Tariffs

Focus Area:

- Manufacturing within 6 defined geographic areas. This includes the broad manufacturing sector OR priority manufacturing sectors being:
 - Agro-processing
 - Green technology
 - Electronics and electrical engineering
 - Clothing and textiles.
- Priority tertiary sector industries are defined by the City's economic research and strategic documents including the Integrated Development Plan, the Social Development Strategy, the Inclusive Economic Growth Strategy and Project Camissa. These industries include:
 - Business Process Outsourcing (BPO),
 - Information and Communication Technology (ICT),
 - Tourism,
 - Film Industry.

Project Type:

- For private development

Goal:

- To attract job-creating investment into Cape Town's economy with a specific focus on making it a preferred business destination.
- Incentivise economic development

a) How it works:

This incentive is only available on the energy component of the tariff to investments that are located in the City supply area and whose usage profile qualifies them for the Investment Incentive SPU, Investment Incentive LV or Investment Incentive MV tariff as contained in the tariff book that forms part of the approved budget. This incentive is available to investments that meet the qualifying criteria and are located in the City.

- i) A reduction of 10% in monthly electricity tariffs for the period of 2 years for users on the Large User TOU (Time of Use) and SPU1 (Small Power User 1) tariffs.
- ii) The incentive tariff will only apply to the energy component of the tariff and not on the fixed and demand components in order to ensure proper load management.

b) Costs or Risks

Loss of income to the City and risk of incentivising unsustainable economic practices, such as land extensive activities or activities which consume very large quantities of water, electricity and generates significant waste. Although this may have a high short-term impact, there is significant risk of entrenching dependencies by weak firms

on City and artificially delaying necessary economic transformation, which is especially pertinent to consolidation areas identified by ECAMP (i.e. Sak's Circle). However, to mitigate against the attached risks the Investment Incentives Policy subjects each geographic area to a limitation on the number of businesses that may access the financial incentives. The rationale for this limitation is to provide a mechanism for the active management of the fiscal impact of the financial incentive as well as being able to adapt to shifting development objectives across each geographic area.

c) Preconditions (When to use it)

- i) Targets areas with clear potential for economic growth but which is currently underperforming/lagging. This will be determined by the market potential and performance scores as revealed in the City's Economic Areas Management Programme (ECAMP). However, this is limited to manufacturing and tertiary sectors.
- ii) Financial incentives for manufacturing sector investments are only available in six industrial nodes within the City. These nodes have been selected based on an evaluation of their current performance, long-term growth potential and suitability for incentives. The designation of spatially targeted geographic areas for incentives will be approved by Council from time to time. The areas where the manufacturing sector incentives currently apply are:
 - (a) Atlantis Industria
 - (b) Triangle Farm
 - (c) Parow Industria
 - (d) Sacks Circle
 - (e) Landsdowne Industrial (known as Philippi North in ECAMP)
 - (f) Elsie's River
- iii) Tertiary sector activities (or service industries) comprise the subset of the economy that provides support to the primary and secondary economic sectors. Priority tertiary sector industries are defined by the City's economic research and strategic documents including the Integrated Development Plan, the Social Development Strategy, the Inclusive Economic Growth Strategy and Project Camissa. These industries include:
 - (a) Business Process Outsourcing (BPO),
 - (b) Information and Communication Technology (ICT),
 - (c) Tourism,
 - (d) Film Industry.

d) Qualifying Criteria

The following criteria must be met in order for investments to qualify for the manufacturing sectors incentives:

- i) The investment must constitute a new investment or expansion of an existing investment in the area, but cannot be a relocation of an existing business or part thereof within the municipal boundaries of Cape Town

- ii) Proposed investment or expansion must be within either the broad manufacturing sector OR priority manufacturing sectors being:
 - (1) Agro-processing
 - (2) Green technology
 - (3) Electronics and electrical engineering
 - (4) Clothing and textiles
- iii) The minimum thresholds to qualify for the incentives are:
 - (5) In the broad manufacturing sector: a minimum of 50 new permanent full time jobs within two years
 - (6) In the priority manufacturing sectors: a minimum of 20 new permanent full time jobs within two years
- iv) The investment or expansion must be located in the spatially areas as approved by Council.

Incentives for investments in tertiary sector industries will be subject to the following criteria:

- i) The investment must constitute a new investment or expansion of an existing investment in the area, and cannot be a relocation of an existing business or part thereof within the municipal boundaries of Cape Town
- ii) The investment must be in one of the City's priority tertiary sector industries as informed by the City's economic research and strategic documents.
- iii) The investment or expansion must create a minimum of 20 new full time jobs within 2 years.
- iv) The strategic or catalytic importance of the investment to Cape Town's economy.
- v) The capital value of investment into Cape Town over a ten-year time horizon must reach a minimum amount of R100 million.
- vi) The investment support for entrepreneurs and SMME's within the sector aligned with the enterprise and supplier development element as described in the Amended Codes of Good Practice

e) Timing

This incentive might change over the lifecycle of an area: The City's ECAMP work has demonstrated that economic areas move through cycles and that different interventions are appropriate at different stages in an areas' lifecycle. This means that an area selected for incentives may lose that Investment Incentives Policy Final Approved May 2018 status in the future. Conversely, areas not selected initially may be targeted at a later stage as its context and performance changes.

f) Approval and Application process (where relevant)

- i) Approval
Approved as part of City's Investment Incentives Policy

ii) Application Process

When an applicant is interested in this incentive or any other incentive offered in the City's Investment Incentive Policy, an initial meeting to be held between the investor and officials from the Investment Facilitation Unit (IFU) for the purpose of clarifying the requirements and scope of the investment incentive scheme and providing any additional information relating to:

- (1) Incentives available,
- (2) Qualifying and performance criteria,
- (3) Information required from the investor,
- (4) the administrative process and timeframes going forward.

Eligibility for the manufacturing sector incentives is based on the qualifying criteria and will be confirmed in an Incentive confirmation letter that will be signed by the Executive Director: Economic Opportunities and Asset Management

Eligibility for tertiary sector development will require approval by Council. Once approved by Council the investor will be informed by the IFU of the outcome in an Incentive confirmation letter that will be signed by the ED. This letter will also list the incentives that the investor is eligible for and any special conditions imposed by Council.

The investor will be required to complete the standard electricity supply application form available from the Electricity Department. This must be accompanied by the incentive confirmation letter where after the investor will be loaded onto the applicable incentivised tariff for a period of two (2) years. The incentive will become available from the date when the new investment becomes operational (i.e. new supply is commissioned).

The IFU will monitor compliance of the investment in terms of reaching the required job targets after the two (2) year period. The Electricity department will also keep record of the amount of discount that the investor receives from this date onwards. Record must be kept for the entire incentivised period so that the total benefit that the investor received can be calculated.

Where the incentive is accessed by an existing investor wishing to expand their operations, the same application process as outlined above will apply. The incentive benefit will become available once the expansion becomes operational. The IFU will conduct a site visit to the premises prior to the expansion and once the expansion is complete in order to verify physical evidence of the expansion.

Due to the City's billing system and clients receiving one municipal account per erf, the incentive will apply to the applicant's entire monthly bill at that erf and not only to the portion that was expanded.

A summary of the application process is depicted in Figure 13 below. Full details can be found in CCT Standard Operational Framework for the Administration of Investment Incentives (2019).

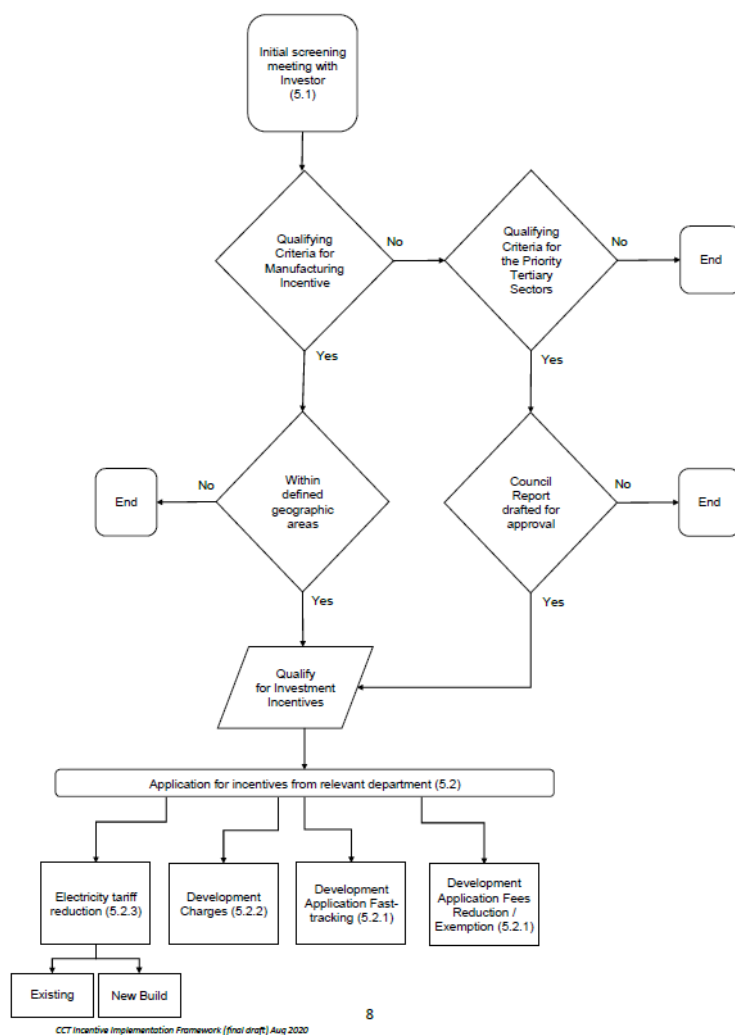


Figure 13: Application Process

g) Advantages and Disadvantages

Advantages	Disadvantages
- Helps reduce operational cost to the property owner. - Currently regulated within the City's Investment Incentive Policy	At the moment this incentive is only applicable to two economic sectors and only six geographic areas in Cape Town. However, this is done to mitigate severe financial risk to the City.

h) Targeted Areas

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

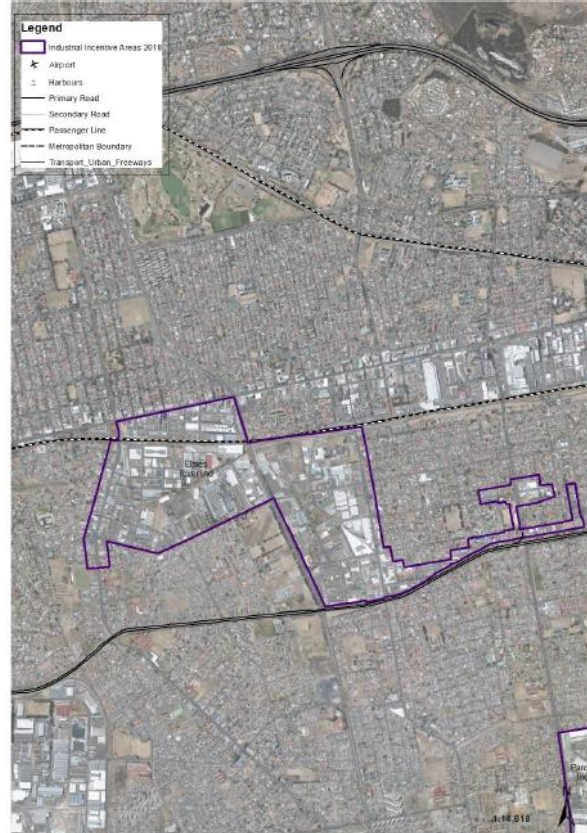
The following tertiary sectors have been identified of this incentive:

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

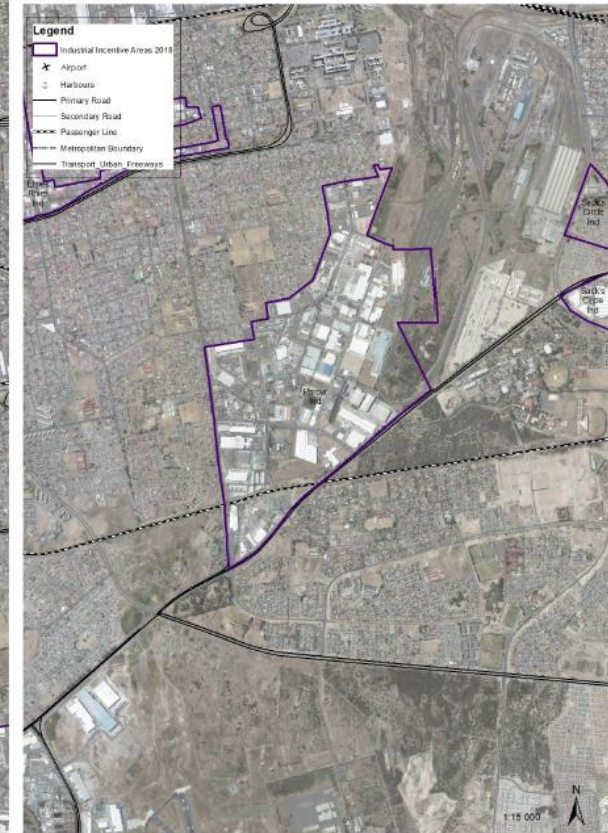
Atlantis Industrial Area



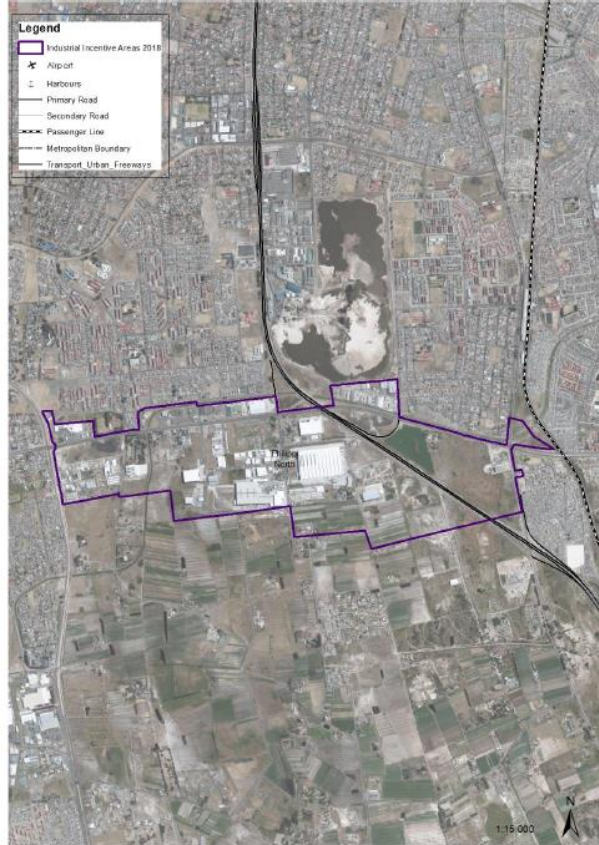
Elsies River



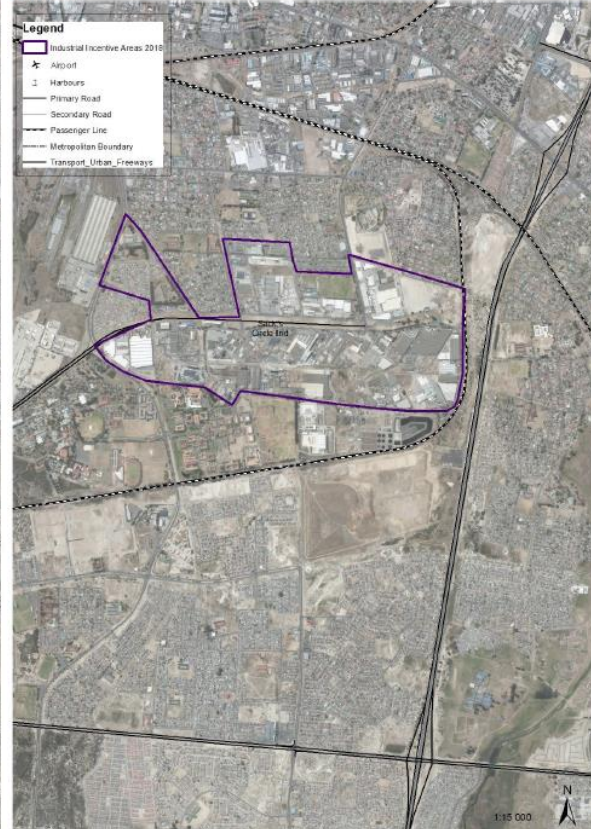
Parow Industria



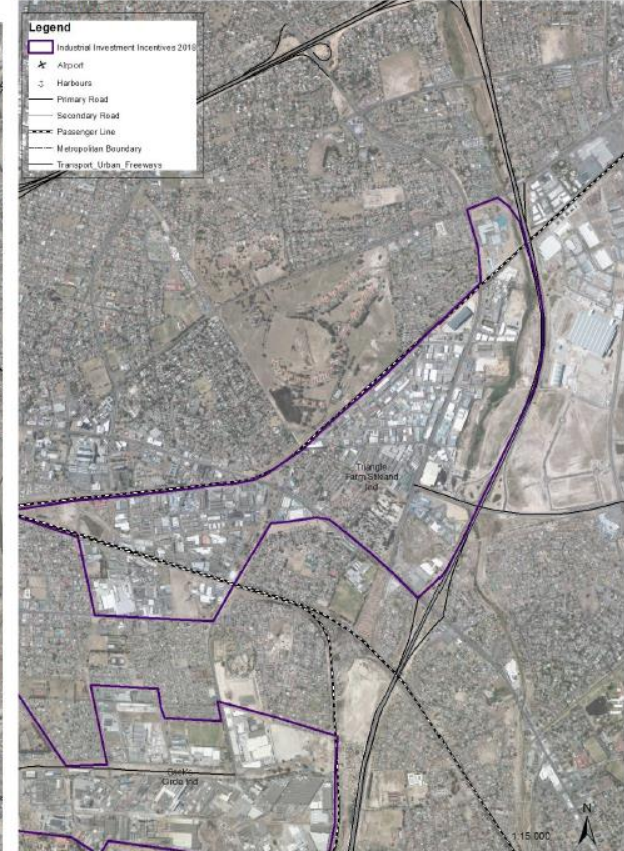
Philippi North



Sacks Circle



Stikland/Triangle Farm



Focus Area:

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

Project Type:

- Areas around Transit Accessible Precincts
- New developments

Goal:

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

a) How it works:

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

Minimum criteria for the demarcation of PT1 and PT2 areas

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

Figure 14: Criteria for PT1 and PT2 areas

Additional minimum criteria to the above for extension of PT1 and PT2 areas

Minimum criteria	PT1 Standard	PT2 Standard
Precinct Level of Service	Maximum of 800m from station	Maximum of 500m from station
Area precincts: Quality and Level of Service (LOS)	Minimum: • Safety and Security: Area lighting with visible security present. • NMT: NMT facilities provide access, including road crossings, to stations and stops. • Maintenance: Regular maintenance undertaken of area.	Minimum: • Safety and Security: Area lighting with visible security present with CCTV surveillance of precinct. • NMT: NMT facilities provide access, including road crossings, to stations and stops. • Maintenance: Regular maintenance undertaken of area. • CID Management: The precinct is included in the area managed by the CID.

Figure 15: Additional criteria for PT1 and PT2 areas

b) Costs or Risks

- i) Risk of a lack of improvement to public transport services (rail and road) and station precincts will prevent uptake of PT1 and PT2 areas offering.
- ii) Hard to break attitudes towards private car use and promote moves to public transport for middle and upper class.

c) Preconditions (When to use it)

- i) The Cape Town Zoning Scheme currently sets out the minimum off-street parking standards required for different land uses and includes the mechanism to identify PT1 and PT2 areas.
- ii) It is only applicable in the areas as delineated on the PT areas map.

d) Timing (i.e. Before or after development, or when to remove the mechanism (i.e. in the case of the UDZ or the investment and incentives policy once the area is self-sustaining)

- i) Applied before development and influences the typologies and forms of development that emerge.

e) Approval and Application process (where relevant)

- i) Approval

No special approval process is needed for land use applications making use of them. However, areas initially determined to be PT1 Areas may be changed to PT2 Areas once the Municipality is satisfied that the provision of public transport is adequate.

- ii) Application

These are applied during the land use and building application submission processes.

f) Advantages and Disadvantages

Advantages	Disadvantages
• Already approved and implemented. • Encourages dense forms of development • Promotes the City's public transport networks • Encourages a move away from single car ridership • Ecological and environmental benefits • Uses public infrastructure more efficiently • Can enable marginally viable developments to become viable	• Does not help pay for a municipality's infrastructure needs • Does not create a direct revenue source for a municipality • Does not distinguish between promoting intensification of trip attracting or trip producing land uses, but is most effective if applied to trip attracting land uses

g) Lessons Learnt

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

h) Targeted Areas

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

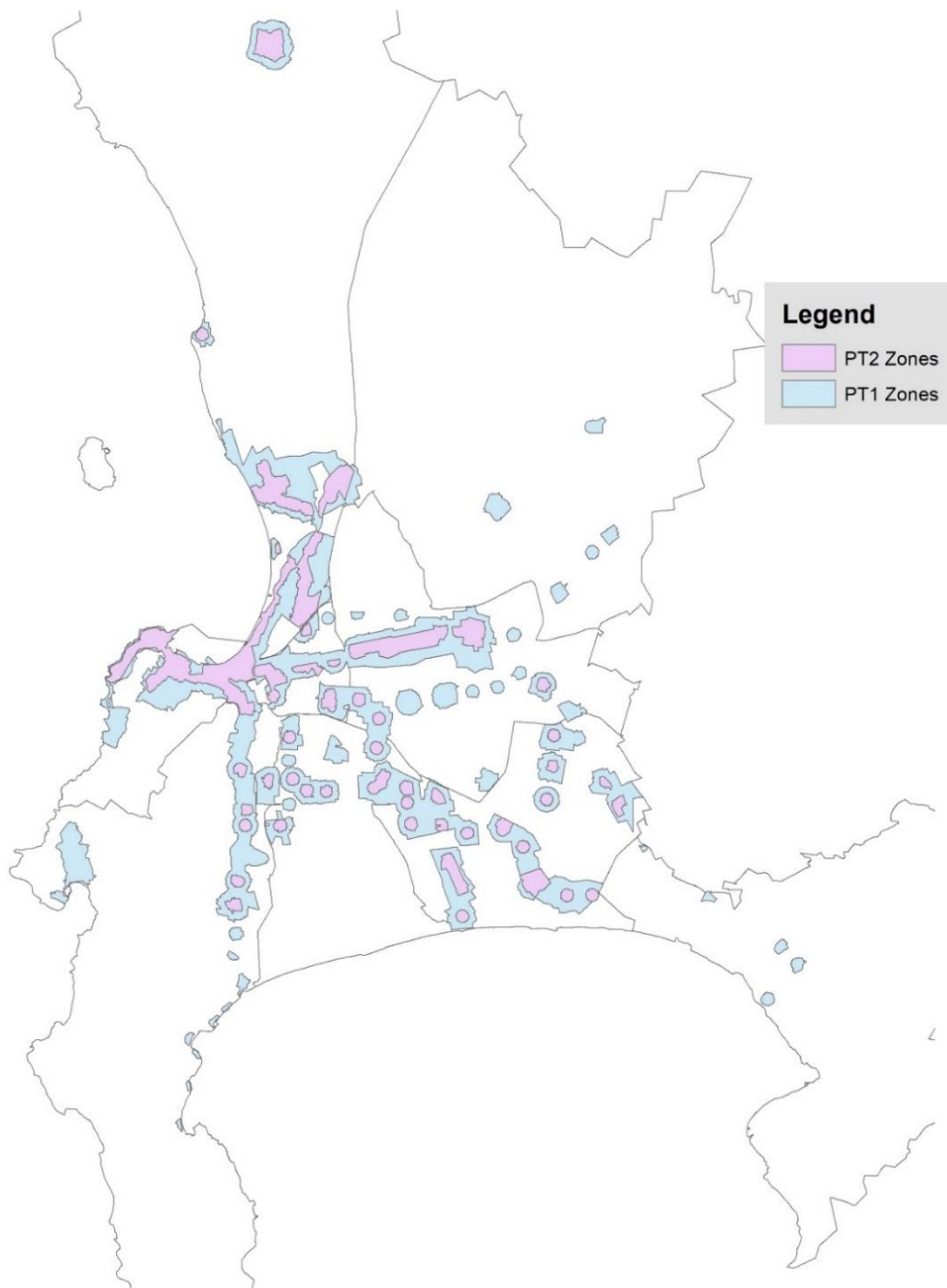


Figure 16: PT Zones

Urban Development Zones

The UDZ is a National Treasury tax incentive administered by SARS that aims to address urban decay in South Africa's inner cities by promoting private sector-led investment in commercial and residential developments.

Focus Area:

- Delineated geographic areas
- Urban centres and inner city environments (experiencing urban decay)
- Areas with high population carrying capacity
- Areas with developed public transport

Project Type:

The tax incentive can be claimed for any of the following within the UDZ geographic area:

- erection, extension or improvement of or addition to an entire building;
- erection, extension, improvement or addition of part of a building representing a floor area of at least 1 000 m²;
- erection, extension, improvement or addition to low-cost housing; or
- purchase of such a building or part of a building directly from a developer on or after 8 November 2005, provided that certain requirements are met.

A taxpayer will only qualify for the UDZ allowance if the building or that part of the building is used solely for purposes of that person's trade (N.B. This excludes residential owner-occupiers.)

Goal:

- The UDZ aims to encourage private sector-led residential and commercial development in inner-city areas with developed public transport facilities.
- The core objectives of the incentive are to address dereliction and dilapidation in South Africa's cities and to promote urban renewal and development by promoting investment by the private sector in the construction and/or improvement of commercial and residential buildings.
- Assist in the maintenance of existing infrastructure.
- Promote wide-range economic development and job creation.

a) How it works:

- i) The UDZ is introduced in the form of an accelerated depreciation allowance on the costs of buildings erected, added to, extended or improved within the UDZ (as effected by the insertion of section 13quat into the Income Tax Act).
- ii) The tax incentive, when claimed, reduces the taxable income of a taxpayer. The incentive is not limited to the taxable income of the taxpayer and can create an assessed loss.
- iii) The UDZ incentive is calculated in different ways depending on the type of development that is improved, added or the inclusion of low-cost housing.
- iv) The municipality determines the boundaries of the areas for the UDZ incentive based on the of 2009 National Treasury/SARS guidelines for delineation of UDZ boundaries.

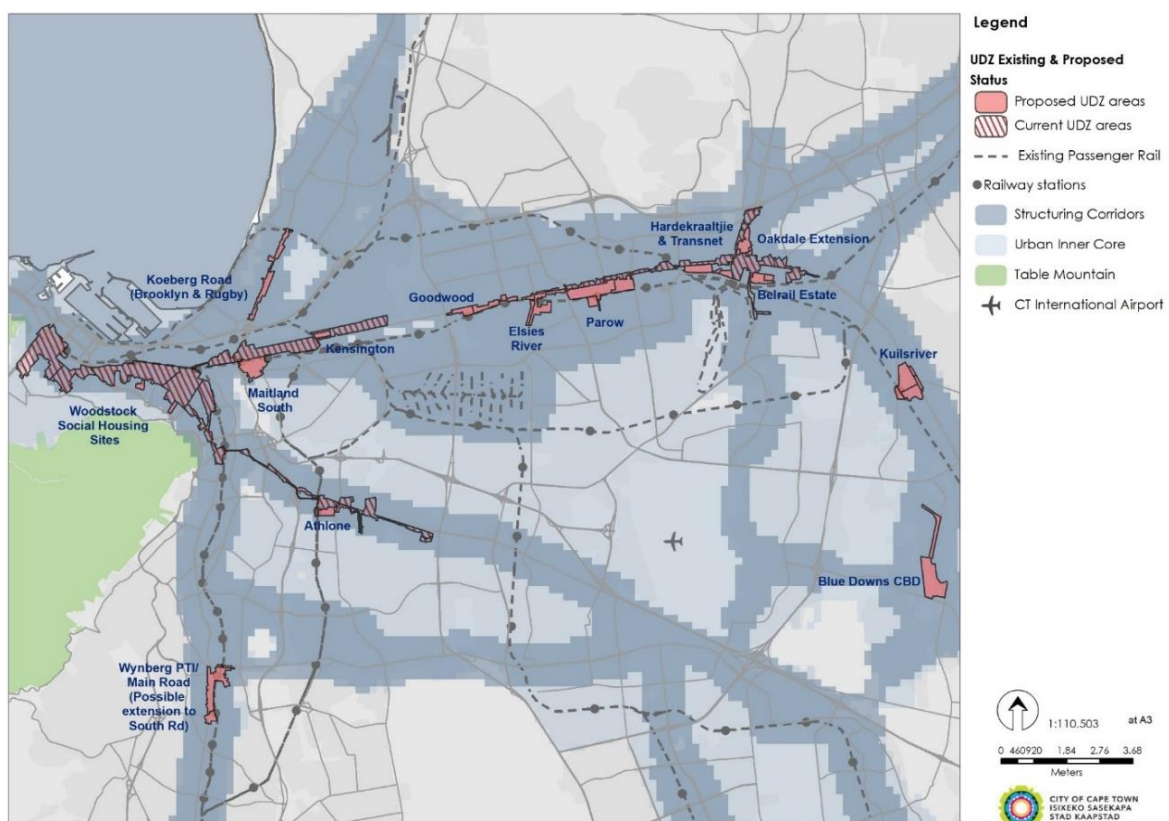


Figure 17: Existing and Proposed UDZ Areas within the City of Cape Town

b) Costs or Risks

- i) Costs borne by the national fiscus through foregone tax, however increased rates generation improves the prospects of municipal self-reliance.
- ii) The UDZ incentive was initially only available until March 20, was subsequently extended to March 2020, and has just been extended until March 2021. The future of the incentive remains unclear.

Note: The City has requested and motivated for the extension of the UDZ Incentive (as well as the UDZ coverage) beyond the current sunset clause.

c) Preconditions (When to use it)

- i) In markets where the municipality would like to facilitate the regeneration of inner city environments into dense and transit-oriented urban areas.
- ii) areas that are experiencing urban decay.

d) Timing

Development in already buoyant, regenerated urban property contexts is potentially over-incentivised, which results in 'freeloading' (e.g. the Cape Town CBD area). This is a criticism that has been bandied about with increasing frequency by civic and social lobbyist groupings. To this end, it is argued that the existing UDZ coverage may require re-delineation to areas that are more consistent with the objectives of the UDZ.

e) Approval and Application process (where relevant)

i) Approval

The UDZ is already an approved incentive in the Income Tax Act.

ii) Application

The onus is on the taxpayer claiming the incentive to complete and submit various forms to SARS. The taxpayers must also obtain a location certificate, issued by the municipality, confirming that the building or part of a building that was constructed, improved or purchased from a developer is located within a UDZ within the boundaries of that municipality.

f) Advantages and Disadvantages

Advantages	Disadvantages
- Existing mechanism with approvals and policy in place. - Does not require municipal financing or any capital resources or debt to implement - Results in spatially targeted development and regeneration of - Uses public infrastructure more efficiently and most likely does not require additional infrastructure - Increases the rates base in certain areas for the City	- As a mechanism by itself, does not always provide enough incentive to draw investment to an area. Other preconditions such as infrastructure, service delivery and urban management are key. - Limited success in promoting the development of low cost housing. - Can result in freeloading, areas like the Cape Town CBD, which is no longer experiencing urban decay, and as evidenced from this review, appears to be over-incentivised - Set to expire in March 2021

g) Lessons Learnt

The UDZ has been operational in Cape Town since 2004. When the UDZ tax incentive was introduced, the City demarcated a total area 630ha for Urban Development zones. Two zones were selected and included Cape Town CBD and Bellville CBD. Both UDZs are located along existing transport corridors. The first zone accounts for (551ha) and includes most of Cape Town CBD, and land adjacent to the Southern Main Road and Klipfontein Road. The second zone includes 78ha of the Bellville

CBD, land adjacent to Voortrekker Road Corridor (CCT, 2016). These areas were selected primarily because they best fit the criteria set out by UDZ legislation. The two zones were characterised as areas where there was significant public investment in infrastructure and service; that they were highly accessible; that accommodated and or serviced large volumes of people; that employed a majority of people and that were economically significant but experiencing decline due to the decentralisation of businesses.

Metropolitan Spatial Planning has produced a comprehensive evidence-basis to inform a motivation to have the Cape Town Urban Development Zone extended beyond March 2021. Evaluate the take-up and performance of the UDZ in Cape Town as well as suggest ways in which the incentive could be improved Also undergone thorough review and research of alternative boundary delineations for the UDZ. See **UDZ Performance Review: Cape Town, 2006 – 2018.**

It was highlighted in the report that the UDZ should be aligned with other development incentives to optimise its function as a spatial targeting tool. These incentives could include:

- Fast-tracking of development application process
- Parking requirement reductions (PT zones)
- Grants for public environment upgrades

Developers engaged with identified these as drawcards for them to invest in an area. Appropriate spatial application of the UDZ as a package of incentives would improve successful implementation of this category. Moreover, the non-existence of other more important inclusionary housing legislation is more of a factor inhabiting low cost inner city housing than the UDZ.

h) Targeted Areas

Existing delineation

Small-Scale Rental Unit Incentives

Focus Area:

- Areas of informality
- Incremental housing
- Single unit land parcels

Project Type:

- Incremental upgrading
- Rental
- Multifamily
- Informal market
- Private

Goal:

- Encourage housing development in areas where the local government has identified a shortage of housing affordable to low- and moderate-income households
- Incentivise development of rental housing stock
- Empower existing home owners to provide additional housing supply and earn additional income.

a) How it works:

- i) In SR2 zoning both a dwelling house and a second dwelling are primary uses and a shelter is permitted as an additional use subject to the owner or occupant accepting shelter.
- ii) To accommodate additional housing units on a property zoned SR2 will require amendments to the Development Management Scheme. Section 148 of the Municipal Planning By-Law (MPBL) makes provision for the preparation of an overlay zone. The City may after following a notice procedure as contemplated in section 81 of the MPBL and after consideration of objections/comments received designate a land unit area to have a specified overlay zone.
- iii) There is more often no formal written lease agreement which regulates the relationship between the tenant and the property owner
- iv) The City should identify areas in which to encourage this form of development

b) Costs or Risks

- i) Administrative costs to verify service availability in targeted areas and ensure compliance with stipulations of incentive.

- ii) USDG funding (from National government) would be required to service approved sites/areas as well as new sites if new township development is required.

c) Timing (i.e. Before or after development, or when to remove the mechanism (i.e. in the case of the UDZ or the investment and incentives policy once the area is self-sustaining)

d) Approval and Application process (where relevant)

i) Approval

Report recently approved by council. Executive Director of Spatial Planning and Environment required to either amend the Zoning Scheme in areas where the City would like to encourage this form of development by either creating an overlay zone or introducing small scale rental units as an additional use within the SR2: Incremental Housing zone.

ii) Application

The time it takes to obtain planning permission is discouraging a number of role players not to make use of this opportunity. To accommodate this development trend, it would be necessary for the City to amend the development rules applicable to SR2 in the Development Management Scheme. This development trend should be limited to areas zoned SR2; areas which have been established in terms of the Housing Act and in association with higher order roads and access to public transport. Additional areas should also be identified via the Local District Plans currently under preparation.

e) Advantages and Disadvantages

Advantages	Disadvantages
• Does not require utilizing any capital resources or debt to implement • Addresses, in part, the housing backlog not covered by state or private market. • Building plans will be made available through a schedule of housing prototypes, speeding up approval process • Empowers potential small scale rental landlords to become owners of an on-site long term capital asset that will grow in value over time • Offers an immediate source of revenue for small scale rental landlords • Can serve to target densification	• Does not create a direct revenue source for a municipality • Does not help pay for a municipality's infrastructure needs • May result in sub-standard, overcrowded conditions if not well managed. • Poor housing conditions may follow if housing prototypes aren't correctly adhered to and maintained into the future. • Some residents may not be able to access financing.

f) Lessons Learnt

Khayelitsha – An assessment of existing small scale rental units in Khayelitsha shows that 7425 additional housing opportunities have been provided on 5294 properties out of a total of 9007 properties. Nearly 60% of the property owners in the study area have exercised the opportunity to use their property to provide additional housing opportunities on their properties. Of the 7425 additional housing opportunities nearly 40% are formal additional housing structures.

Development delivery of additional rental stock occurs in a relatively short period of time. Since the 2011 census it can be stated that individual private owners in Khayelitsha have provided 24 725 additional housing opportunities on their properties. This response was in the face of a lack of government housing provision in this area although this area accommodates some of the highest number of poor people in the City.

g) Targeted Areas

SR2 Zoning, specifically informal areas

12.8.1.2. Income Generation Mechanisms

City-Owned Land Disposals and Leasing

Focus Area:

- Revitalizing areas
- Infill development

Project Type:

- City-owned properties that are transferred by way of sale for private redevelopment
- City-owned properties that are transferred by way of leasehold for private development
- Can be used to finance construction of infrastructure associated with redevelopment of the site (land in lieu of cash payment)
- A municipality can enter into a joint venture with a private developer by contributing land as equity

Goal:

- Dispose of property no longer needed for public purpose.
- Promote economic development.
- Ensure the most optimal utilisation of a property within the municipality's strategic objectives

a) How it works:

- i) In the case of **sales** of City-owned land:
 - (1) Local government disposes of property and transfers development rights to a private developer for economic development purposes:
 - (a) Land for a fee
 - (b) Land as in-kind payment for infrastructure
 - (c) Land as equity for development
 - (2) Tender process
 - (3) Local government may seek to maximise fair market value of the land or maximise other policy goals (e.g. affordable housing)
 - (4) Municipality & developer negotiate the land disposition deal structure with the goal of aligning public and private interests
- ii) In the case of **leasing** of City-owned land:
 - (1) The municipalities can also enter into long term lease agreements in respect of parcels of municipal land. The entering into these development rights agreements and lease agreements with a development company as described above may offer municipalities a better combination of cost, quality, quantity, productivity, risk and leverage capacity of financial resources, then could otherwise be obtained.

- (2) Methods of awarding leases may be by bidding process either by public tender or auction or by unsolicited bids or under certain conditions by private treaty.
- (3) The municipality would enter into a land availability agreement and/or development rights agreement (DRA) with a development company to develop the property.
- (4) The agreements will stipulate the consideration payable by the development company as well as the payment mechanism, timelines related to the completion of the development, the responsibilities of each party in relation to, inter alia, the township establishment, zoning, services etc.
- (5) The development company would develop the property at its own risk and costs.
- (6) The municipality would transfer the property which is the subject of the development into a special purpose vehicle
- (7) The development lease would be for a period of 99 years.
- (8) Conditions would need to be set if there are going to be sub-letting of commercial/residential stands or if sale agreements are reached with end-users.

b) Costs or Risks

- i) Loss of an asset, but positive fiscal impact due to one-time transaction and long-term social or economic benefit in the case of sale of land
- ii) Can achieve City strategic developments on land which the City does not have the capacity to develop on by leasing/releasing land to private market.
- iii) Requires expertise within the local authority to negotiate with private sector
- iv) Land may be used in line with spatial goals if the right conditions are attached to its disposal.

c) Preconditions (When to use it)

- i) When City-owned property is no longer needed for public use
- ii) When to use depends on the City's main goals for the site (e.g. strong market conditions if goal is to maximize market value of the asset)
- iii) May be used to catalyse regeneration of a larger area where the market has lacked investment
- iv) Municipality must have authority to dispose of public property for private development
- v) Ideally dispose of land when market conditions are positive and where the site does not have major development constraints
- vi) Land may be disposed as equity for development:
 - (1) When there are challenges to redevelop the site making it unattractive to a private developer, the municipality may contribute the value of the land

(2) When land is adjacent to privately owned sites and can be combined into one regeneration project

d) Timing (i.e. Before or after development, or when to remove the mechanism (i.e. in the case of the UDZ or the investment and incentives policy once the area is self-sustaining)

e) Approval and Application process (where relevant)

i) Approval

This is already an approved operational process.

ii) Application

Follows Municipal Asset Transfer Regulations (MATR).

f) Advantages and Disadvantages

Advantages	Disadvantages
• Can result in direct cash revenues for a municipality in exchange for leasing or the selling of City-owned land • Redevelopment of a property promotes job creation • Results in increased tax revenues (potentially property taxes, sales tax, income taxes depending on the type of uses developed on the property) • Puts a vacant or underutilized property back into active use, which would otherwise continue to sit vacant and cause blight in a community • Can catalyse regeneration of an area which lacks investment • May encourage land use intensification	• If there are conditions that make redevelopment of the City-owned property financially challenging for a developer, a reduction in direct cash revenue or a public subsidy may be required • If selling City-owned property, this results in the City's loss of control over what gets developed on the property in the future. (Unless use covenants are in place, the new owner can change the use of the property in the future and the municipality can no longer assure that the project matches the development goals of the City)

g) Lessons Learnt

- Big Bay development
- Khayelitsha CBD
- LCC Parow
- Stellenbosch University Bellville Park Campus:
 - Stellenbosch University (SU) purchased 69 ha of land from the Bellville Municipality in 1982, of which ~23 ha is unsuitable for formal development purposes. In 2015 a MOA was signed between the City of Cape Town (CoCT) and SU regulating their relationship in the development of the purchased land. 18 ha of the developable land was designated for the establishment of new academic facilities and 26 ha of the remaining

developable land was earmarked for the development of a business node. The portion to be developed would need to have title deed restrictions removed in order for development to proceed at which point the two parties would share development costs (and/or bulk allocation) on a pro-rata basis. Revenue generated through the leasing or sale of land within the Bellville Park Campus will be shared equally between the two parties.

h) Targeted Areas

- i) Vacant and underutilised City-owned land throughout the city.
- ii) Catalytic Land Development Programme (CLDP) TOD Nodes or Areas.
- iii) TOD Hubs

12.8.1.3. Institutional Mechanisms

Streamlined Land Use Applications

Focus Area:

- Industrial areas
- Value-added production sector
- Manufacturing within 6 defined geographic areas. This includes the broad manufacturing sector OR priority manufacturing sectors being:
 - Agro-processing
 - Green technology
 - Electronics and electrical engineering
 - Clothing and textiles.
- Priority tertiary sector industries are defined by the City's economic research and strategic documents including the Integrated Development Plan, the Social Development Strategy, the Inclusive Economic Growth Strategy and Project Camissa. These industries include:
 - Business Process Outsourcing (BPO)
 - Information and Communication Technology (ICT)
 - Tourism
 - Film Industry

Project Type:

- New external investments
- Expansion of existing investment within proposed areas

Goal:

- To attract job-creating investment into Cape Town's economy with a specific focus on making it a preferred business destination.
- Incentivise economic development.

a) How it works:

- i) Currently, the fast-tracking of land use applications has been proposed by the Investment Incentives Policy (2018). The process and criteria for applying this mechanism is drawn from that document.
- ii) Applies to **all land use and building plan applications** by qualifying investments conditional on submission of suitably completed and compliant applications
- iii) **Additions to this methodology can be made**
 - (1) To extend the areas in which this incentive applies given the limited spatial scope of its current approach which only focuses on the Atlantis SEZ industrial area, Triangle Farm, Parow Industria, Sacks Circle Landsdowne Industrial (known as Philippi North in ECAMP) Elsie's River
 - (2) New spatial sites should be proposed for this mechanism which will offer pre-approvals for applications in Development Focus Areas.

- (3) Further capacity will be required for the Land Use Management Department and the Land Use Management System (LUMS).
 - (4) This could also emerge as a by-product of a proposed overlay zone to further the incentives proposed by an overlay zone.
- iv) The TOD Manual for Development Management proposes:
- (1) The City should streamline land use application process for development proposals in line with TOD and located in TAPs
 - (2) Figure 18 illustrates the depiction of a typical development application process, which the TOD Manual offers ways in which operational improvements can take place.
 - (3) When a developer contemplates a land use application for approval by the City a pre-application consultation phase exists before the submission and assessment of the formal application. This is especially important when the application is likely to result in construction activities that will require municipal services.
 - (4) An important first step in the pre-application consultation stage is to determine if the development proposal meets the criteria for decision as set out in Section 99 of the City of Cape Town Municipal Planning By-law 2015. Part of the abovementioned determination also includes a "consistency evaluation" of the development proposal with the MSDF.
 - (5) Within the "Urban Inner Core" with access to **existing** scheduled public transport service within Structuring Corridors **a three step consultative process** is suggested for applications relating to the rezoning of land, including rezoning to sub-divisional area overlay zoning.
 - (6) The three step consultative process occurs prior to the submission being made and includes meeting between a Development Management case officer, the developer and the relevant line departments. The focus of this process is on the **yield and type, urban design, environment and heritage, and transport operations and infrastructure**.
 - (7) Further detail is provided in Figure 20 as to the approach which should be taken "Urban Inner Core" with access to **planned** scheduled public transport within Structuring Corridors
 - (8) For the remainder of the "Urban Inner Core" (i.e. those areas without access to scheduled public transport) and "Consolidation" areas, Discouraged Growth Areas and Critical Natural Assets, standard operating procedures apply unless applications are made for substantial intensification of land use within Discouraged Growth Areas.
 - (9) However, additions to these geographically delineated areas can be made to include the Development Focus Areas or mandating that a blanket approach is taken with regards to land use applications throughout areas such as the Urban Inner Core and Restructuring Zones that makes the pre-application consultation mandatory.

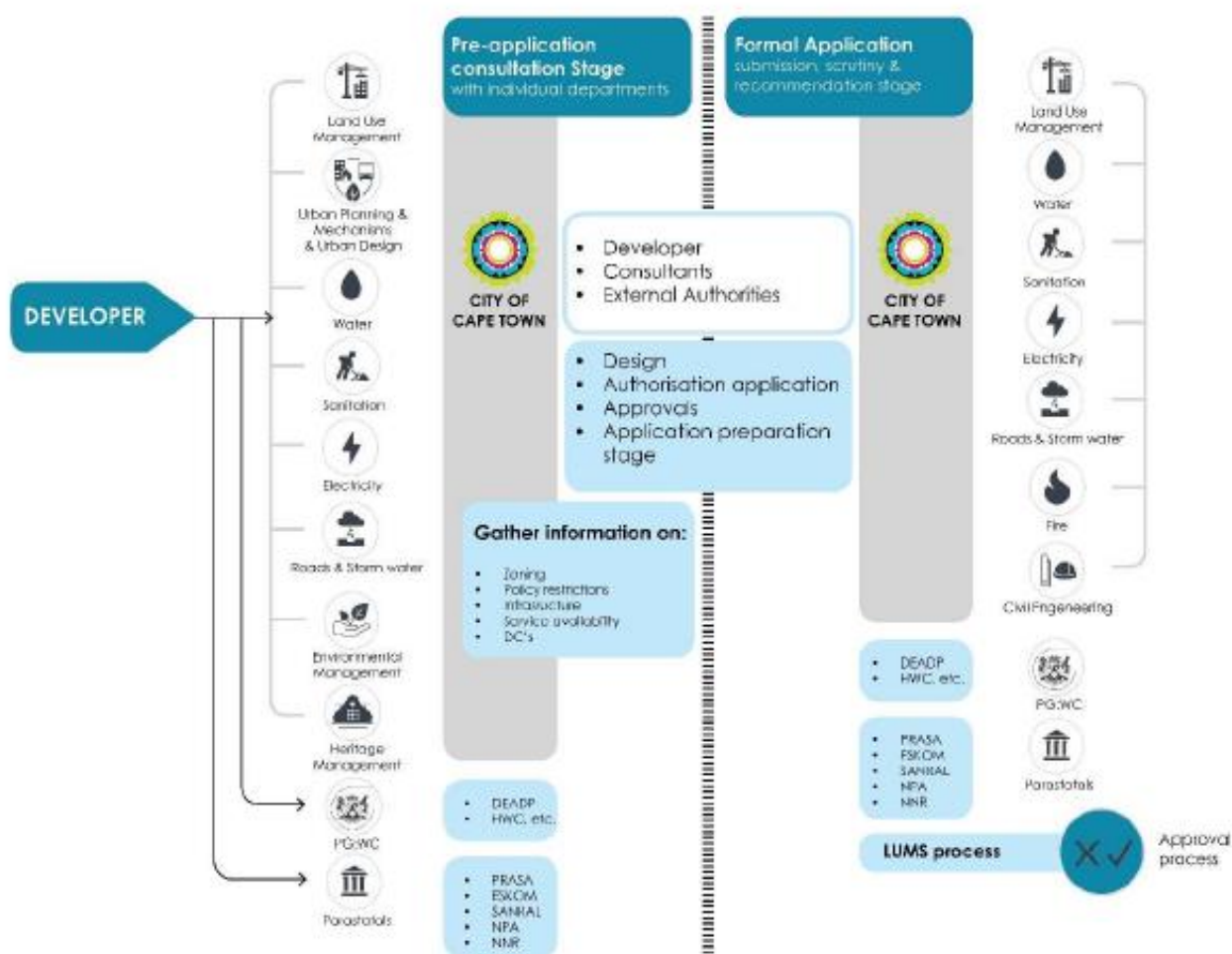


Figure 18 Depiction of a typical development application process

The **THREE STEP TECHNICAL CONSULTATIVE PROCESS** led by the DM Case Officer is as follows:

Step 1: Yield and Type

Clarify the "yield" of the proposal in terms of unit density and/or floor factor GLA (as guided by TODC/Densification Policy or other applicable local framework)

Negotiations on inclusionary housing should also be initiated and finalised in principle if applicable.

Step 2: Urban design, environment and heritage

Do a broader contextual evaluation of the proposal in terms of the City of Cape Town Urban Design Policy and TOD Design Parameters (refer to section 6 of this document). This should include environmental and heritage considerations

Step 3: Transport operations and infrastructure

Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects:

- Access arrangements, Parking provision, Road schemes and width, NMT, Traffic circulation, Public transport

The relevant study then needs to be submitted for pre-assessment after which a technical discussion will be arranged. During the technical discussion the specific transport elements of the design directive will be confirmed. Clarity should also be obtained by the applicant as to the availability of bulk utility services.

Figure 19 Three step consultative process for applications

GUIDELINES FOR ASSESSING LAND USE APPLICATIONS					
APPLICATION TYPE	"Urban Inner Core" with access to <u>existing scheduled public transport</u> service within Structuring Corridors	"Urban Inner Core" with access to <u>planned scheduled public transport</u> within Structuring Corridors	Remainder of "Urban Inner Core" and "Consolidation" Areas	Discouraged Growth Areas	Critical Natural Assets
Rezoning of land, including rezoning to sub-divisional area overlay zoning	Prior to submission, the applicant needs to be assisted with a clear <u>design directive</u> and clarity on application processes to be followed. This needs to be followed up with a three-step pre-submission technical consultation session <u>to finalise a design directive</u> for the proposal. This process is likely to be iterative until the design directive is clear. See below for the THREE STEP TECHNICAL CONSULTATIVE PROCESS. General Practice The case officer is the lead, setting up all three sessions and follow-up sessions until there is clarity on a design directive. - The final development directive, including the items identified during all three steps, should be <u>written up by the applicant (and verified by the case officer) and submitted as part of the development application.</u> - Care should be taken during the follow-up processing of the application that the proposal be evaluated in terms of the agreed design directive only. - Compliance by the applicant to the design directive should result in a shortened evaluation timeline. - Any major deviations from the design directive may lead to an intensive scrutiny and assessment of the application that could be time consuming.	A pre-submission consultation is compulsory to clearly establish the processes to be followed and to point out the relevant design aspects that need to be addressed. The proposed design must include "flexible elements" so that it would be able to "retrofit" the development once the public transport service is in place. <u>(Specific specialist guidance to be provided by the Urban Design Branch.)</u> Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	Standard operating procedures. For an application in the urban inner core area, cognisance should be taken of TODC and the applicant should address this in the motivation and design.	Standard operating procedures are followed for applications that do not result in the substantial intensification in land use rights. Prior to submission of application <u>for substantial intensification of land use</u> the applicant is required to initiate a pre-submission consultation session at the relevant district office. During the session clarity will be provided on the specialist studies required and application processes to be followed. Specialist studies may include: • Financial feasibility study • Provision of engineering services (internal and external) • Environmental and or heritage; • Hydrological • Geotechnical • Visual impact • Socio economic impact • Transport infrastructure and operations • ICT infrastructure	Standard operating procedures.
	The THREE STEP TECHNICAL CONSULTATIVE PROCESS led by the DM Case Officer is as follows: Step 1: Yield and Type Clarify the "yield" of the proposal in terms of unit density and/or floor factor GLA (as guided by TODC/Densification Policy or other applicable local framework) Negotiations on inclusionary housing should also be initiated and finalised in principle if applicable. Step 2: Urban design, environment and heritage Do a broader contextual evaluation of the proposal in terms of the City of Cape Town Urban Design Policy and TOD Design Parameters (refer to section 6 of this document). This should include environmental and heritage considerations Step 3: Transport operations and infrastructure Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects: • Access arrangements, Parking provision, Road schemes and width, NMT, Traffic circulation, Public transport The relevant study then needs to be submitted for pre-assessment after which a technical discussion will be arranged. During the technical discussion the <u>specific transport elements of the design directive will be confirmed</u>. Clarity should also be obtained by the applicant as to the availability of bulk utility services.				

APPLICATION TYPE	"Urban Inner Core" with access to <u>existing scheduled public transport</u> service within Structuring Corridors	"Urban Inner Core" with access to <u>planned scheduled public transport</u> within Structuring Corridors	Remainder of "Urban Inner Core" and "Consolidation" Areas	Discouraged Growth Areas	Critical Natural Assets
Subdivision of land	The main consideration in such an application is to achieve the "ideal block size" spectrum as advised by Urban Design Branch. Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	The main consideration in such an application is to achieve the "ideal block size" spectrum as advised by Urban Design Branch. Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	Standard operating procedures. For an application in the urban inner core area, cognisance should be taken of TODC and the applicant should address this in the motivation and design.	Standard operating procedures.	Standard operating procedures.
Consolidation of land	The main consideration in such an application is to achieve the "ideal block size" spectrum as advised by Urban Design Branch. Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	The main consideration in such an application is to achieve the "ideal" block size spectrum as advised by Urban Design Branch. Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	Standard operating procedures. For an application in the urban inner core area, cognisance should be taken of TODC and the applicant should address this in the motivation and design.	Standard operating procedures.	Standard operating procedures.

APPLICATION TYPE	"Urban Inner Core" with access to <u>existing scheduled public transport</u> service within Structuring Corridors	"Urban Inner Core" with access to <u>planned scheduled public transport</u> within Structuring Corridors	Remainder of "Urban Inner Core" and "Consolidation" Areas	Discouraged Growth Areas	Critical Natural Assets
Permanent Departure	Specific attention should be given to the following departure types: • Parking • Floor area • Height • Access requirements • Building line Departures granted should achieve the TODC yield and urban design guidelines, transport objectives and standards. Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	Specific attention should be given to the following departure types: • Parking • Floor area • Height • Access requirements • Building line The proposed design must include "flexible elements" so that it would be able to "retrofit" once the public transport service is in place. <i>(Specific specialist guidance to be provided by the Urban Design Branch).</i> Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	Standard operating procedures. For an application in the urban inner core area, cognisance should be taken of TODC and the applicant should address this in the motivation and design.	Standard operating procedures.	Standard operating procedures.
Consent, approval or any other permission or requirement in terms of the development management scheme	Consent granted should achieve the TODC yield and urban design guidelines, transport objectives and standards. Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	The proposed design must include "flexible elements" so that it would be able to "retrofit" once the public transport service is in place. <i>(Specific specialist guidance to be provided by the Urban Design Branch).</i> Confirm the relevant transport impact study that will be required (in line with TIA Toolkit) that may include but is not limited to the following aspects: • Access arrangements • Parking provision • Road schemes and width • NMT • Traffic circulation • Public transport	Standard operating procedures. For an application in the urban inner core area, cognisance should be taken of TODC and the applicant should address this in the motivation and design.	Standard operating procedures.	Standard operating procedures.

Figure 20 Guidelines for assessing land use applications

b) Qualifying Criteria

- i) Those applications which would qualify for the pre-application consultation process are defined by geographic location within:
 - (1) The “Urban Inner Core” with access to existing scheduled public transport service within Structuring Corridors, or
 - (2) The “Urban Inner Core” with access to planned scheduled public transport within Structuring Corridors
- ii) Eligibility requirements for the fast-tracking of applications as per the Investment Incentives Policy include:
 - (1) **General Criteria** – The investment must constitute a new ‘external’ investment or the expansion of an existing investment in the area, and cannot simply be a relocation of businesses already based within the municipal boundaries of Cape Town.
 - (2) **Sectoral Criteria** – The investment must be in a sector which enhances the value-added production capacity of Cape Town. More specifically, the proposed investment should be located in the manufacturing sector. All investments in the manufacturing sector, subject to meeting the relevant criteria, are eligible for incentives. However, a number of specific manufacturing sub-sectors are prioritised by the City in alignment with the City’s strategic economic development objectives. These priority sub-sectors are derived from the City’s IDP and Economic Growth Strategy (EGS) and are in alignment with the Industrial Policy Action Plan 2013-2016. The incentives will be structured accordingly around this prioritisation.
 - (3) **Spatial Criteria** – Incentives for manufacturing sector investments will only be available in predetermined industrial nodes within the City. The targeting of specific areas for the provision of revenue-implication incentives is essential to ensure that the City’s development objectives are met, while affordability is maintained. Industrial nodes will be selected based on a process currently being undertaken in which business and industrial nodes across Cape Town are tracked by systematically assessing their current performance, long-term growth potential and suitability for incentives. They will also need to fall within the City’s identified integration zones. The designation of new spatial areas for application of the incentives will be approved by Council. The number of investment incentives approved and the extent of the time period for which applications will be taken will vary according to the specific spatial characteristics of the identified industrial nodes. Location-specific limits on the number of businesses which can obtain financial incentives in particular will ensure that the City can manage the fiscal cost of incentive provision while responding to the different development objectives the City has for different areas.
- iii) Financial incentives for manufacturing sector investments are only available in six industrial nodes within the City. These nodes have been selected based on an evaluation of their current performance, long-term

growth potential and suitability for incentives. The designation of spatially targeted geographic areas for incentives will be approved by Council from time to time. The areas where the manufacturing sector incentives currently apply are:

- (1) Atlantis Industria
 - (2) Triangle Farm
 - (3) Parow Industria
 - (4) Sacks Circle
 - (5) Landsdowne Industrial (known as Philippi North in ECAMP)
 - (6) Elsie's River
- iv) The following sectors will be eligible for fast-tracked approvals as part of the investment incentives:
- (1) Broad Manufacturing Sector
 - (2) Priority Manufacturing Sectors:
 - (a) Agro-processing
 - (b) Green technology
 - (c) Electronics and electrical engineering
 - (d) Clothing and textiles
 - (3) Priority tertiary sector industries which include:
 - (a) Business Process Outsourcing (BPO)
 - (b) Information and Communication Technology (ICT)
 - (c) Tourism
 - (d) Film Industry

c) Costs or Risks

- i) Administrative costs to the municipality, undertaken by LUMS to ensure that qualifying criteria have been met.
- ii) Each geographic area may be subject to a limitation on the number of businesses that may access the financial incentives. The rationale for this limitation is to provide a mechanism for the active management of the fiscal impact of the financial incentive as well as being able to adapt to shifting development objectives across each geographic area.

d) Preconditions (When to use it)

- i) Targets areas with clear potential for economic growth but which is currently underperforming/lagging. This will be determined by the market potential and performance scores as revealed in the City's Economic Areas Management Programme (ECAMP). However, this is limited to manufacturing and tertiary sectors.
- ii) Financial incentives for manufacturing sector investments are only available in six industrial nodes within the City. These nodes have been selected based on an evaluation of their current performance, long-term growth potential and suitability for incentives. The designation of spatially targeted geographic areas for incentives will be approved by Council from

time to time. The areas where the manufacturing sector incentives currently apply are:

- (u) Atlantis Industria
 - (v) Triangle Farm
 - (w) Parow Industria
 - (x) Sacks Circle
 - (y) Landsdowne Industrial (known as Philippi North in ECAMP)
 - (z) Elsie's River
- iii) Broad Manufacturing Sector where there are investments resulting in more than 50 people being permanently employed within 24 months.
 - iv) Priority Manufacturing Sectors where there are investments resulting in more than 20 people being permanently employed within 24 months.
 - v) The investment must be in one of the City's priority tertiary sector industries
 - vi) The investment or expansion must be located in the spatially areas as approved by Council.

e) Timing

- i) Land use application - 3 months
- ii) Building plan decisions - 5 working days
- iii) Occupancy certificate – 10 working days

This incentive might change over the lifecycle of an area: The City's ECAMP work has demonstrated that economic areas move through cycles and that different interventions are appropriate at different stages in an area's lifecycle. This means that an area selected for incentives may lose that Investment Incentives Policy Final Approved May 2018 status in the future. Conversely, areas not selected initially may be targeted at a later stage as its context and performance changes.

f) Approval and Application process (where relevant)

- i) Approval

Approved as part of the City of Cape Town's Investment Incentives Policy. This is to be reviewed every two years. LUMS timeframes are only achievable where delegated applications are processed (i.e. no TIAs required).

- ii) Application

The fast tracking of applications approach as per the City of Cape Town's Investment Incentives Policy is applied as follows:

When an applicant is interested in this incentive or any other incentive offered in the City's Investment Incentive Policy, an initial meeting to be held between the investor and officials from the Investment Facilitation Unit (IFU) for the purpose of clarifying the requirements and scope of the investment incentive scheme and providing any additional information relating to:

- (1) Incentives available,
- (2) Qualifying and performance criteria,
- (3) Information required from the investor,
- (4) the administrative process and timeframes going forward.

Eligibility for the manufacturing sector incentives is based on the qualifying criteria and will be confirmed in an Incentive confirmation letter that will be signed by the Executive Director: Economic Opportunities and Asset Management

Eligibility for tertiary sector development will require approval by Council. Once approved by Council the investor will be informed by the IFU of the outcome in an Incentive confirmation letter that will be signed by the ED. This letter will also list the incentives that the investor is eligible for and any special conditions imposed by Council.

In order to take up the development application fee waivers and fast tracking incentives the investor will submit their incentive confirmation letter together with their development applications. Both must be submitted electronically via the Development Application Management System (DAMS) portal.

Once submitted the client must alert the IFU who will in turn alert the Customer Interface official and request the waiver of the submission fee¹. Once the fee is waived the application can be processed further within DAMS. The Customer Interface office will keep record of the value of the waived application fees and send this to the E&I Department for quarterly uptake capturing purposes.

A summary of the application process is depicted in Figure 21 below. Full details can be found in CCT Standard Operational Framework for the Administration of Investment Incentives (2019).

This incentive applies to all land use and building plan applications by qualifying investments conditional on submission of suitably completed and compliant applications

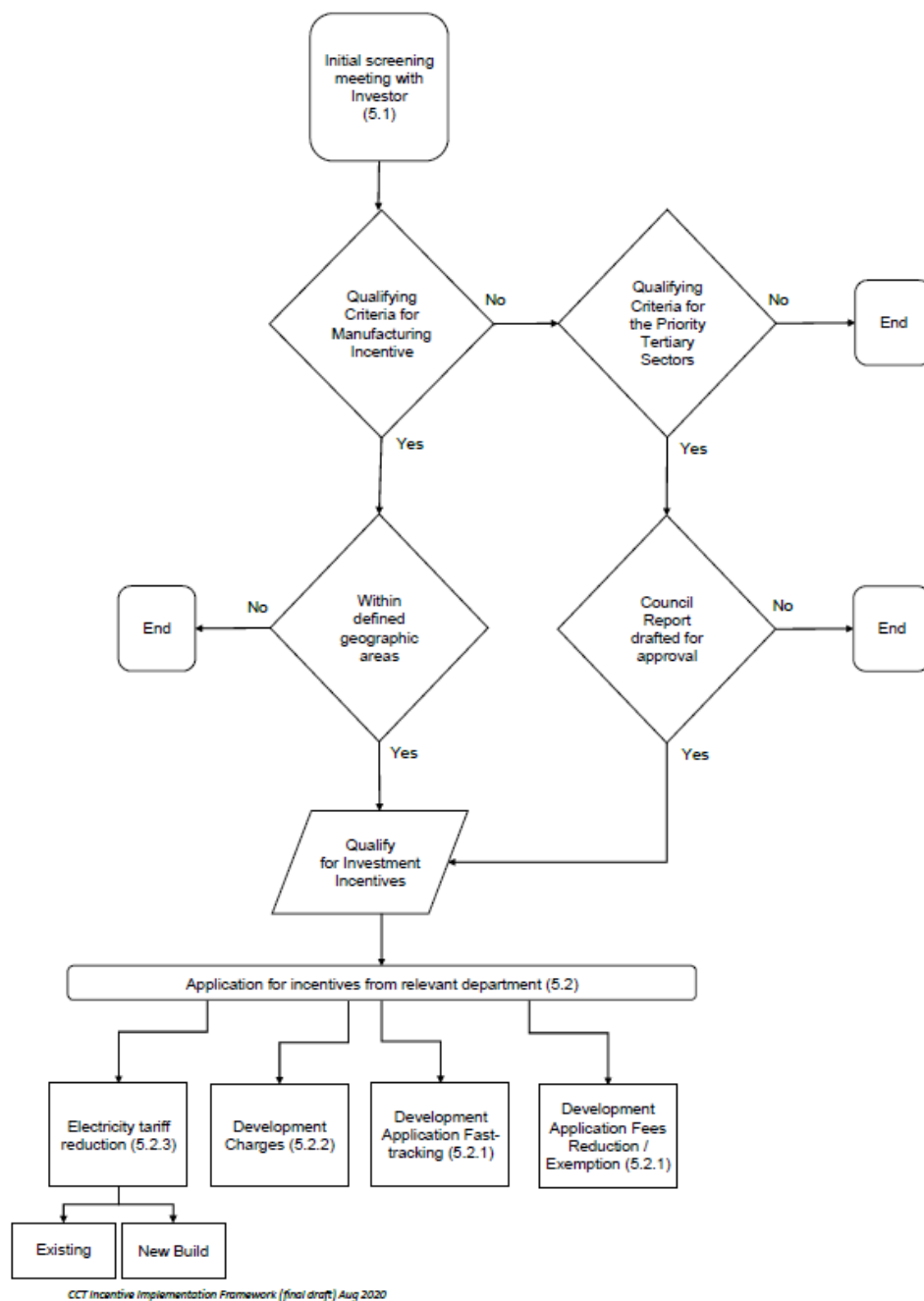


Figure 21 Application Process

However, the pre-application consultation approach utilised by the TOD Manual for Development Management can be expanded to be applied beyond its current criteria. Currently, the 3 Step Technical Consultative Process has a narrow scope of applicability, applying to those developments within areas of the Urban Inner Core with access to existing or future public transport service within structuring corridors. Additional areas to be considered for the fast-tracking of land use and building application approvals includes the Development Focus Areas. **Development Focus Areas** are those areas with highest level of accessibility and highest transformative impact, where dedicated infrastructure capacity and budget is required to facilitate development. This does not imply that other areas cannot be identified as areas of development focus for the duration of the District Plans. Further application of the pre-application process can be made by recommending that a blanket approach is taken with regards to land use applications throughout areas such as the Urban Inner Core and Restructuring Zones that makes the pre-application consultation mandatory.

g) Advantages and Disadvantages

Advantages	Disadvantages
• Reducing delays in processing of land use applications can dramatically assist in commencing of projects. • Is already approved as part of City Investment Incentives Policy – no additional process required • All necessary line departments are consulted in pre-application process which ensure a holistic engagement approach • Pre-application process ensures that private sector is fully informed regarding the necessary inclusions into their application which allows it to be processed without the need for revisions once submitted	• Limited scope of applicability of mechanism – only six areas within CCT are targeted for this incentive • Only two economic sectors targeted – could be expanded to include other sectors • The pre-application process will require staff to engage with development companies and may require additional staffing requirements if there is a greater uptake in this approach.

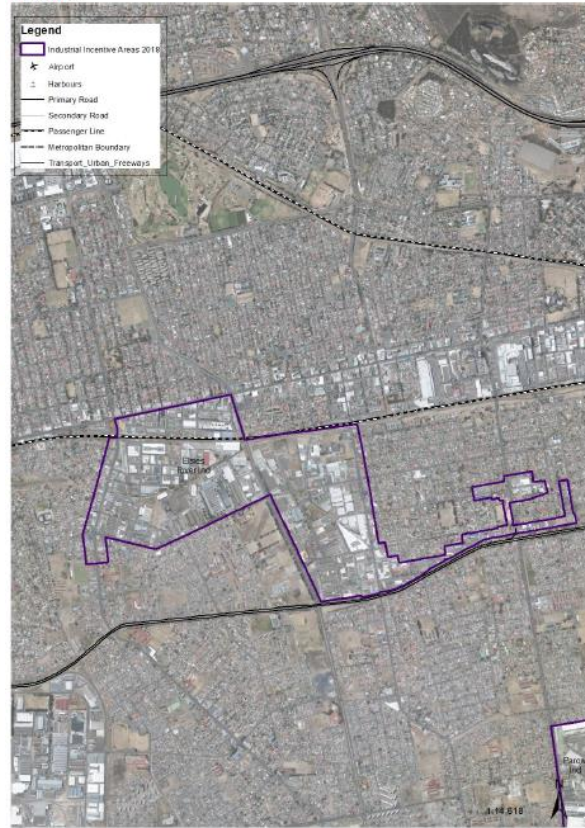
h) Targeted Areas

Incentives for manufacturing sector investments are currently only available in six industrial nodes within the City. These are Atlantis SEZ industrial area, Triangle Farm, Parow Industria, Sacks Circle, Landsdowne Industrial (known as Philippi North in ECAMP), and Elsie's River. The maps below depict geographic areas for manufacturing incentives which include the fast-tracking of land use and building plan applications as per the City's Investment Incentives Policy:

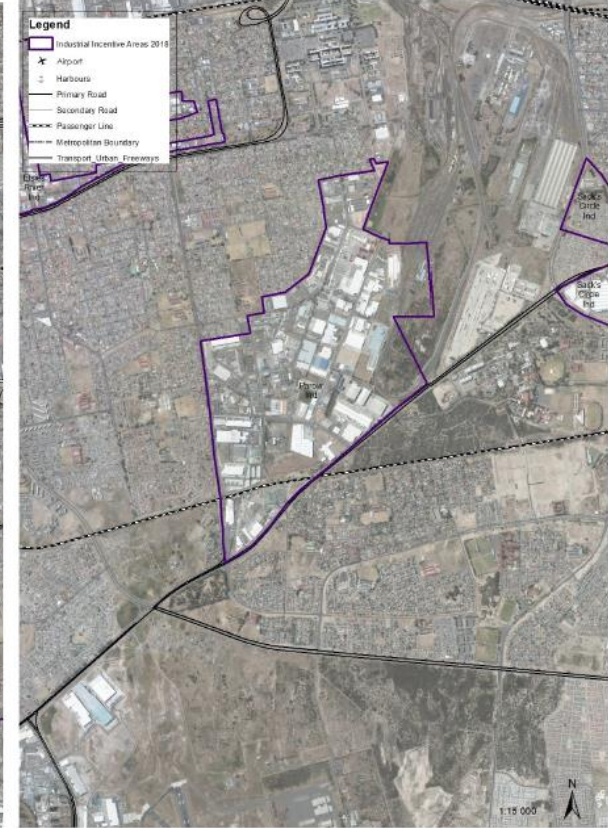
Atlantis Industrial Area



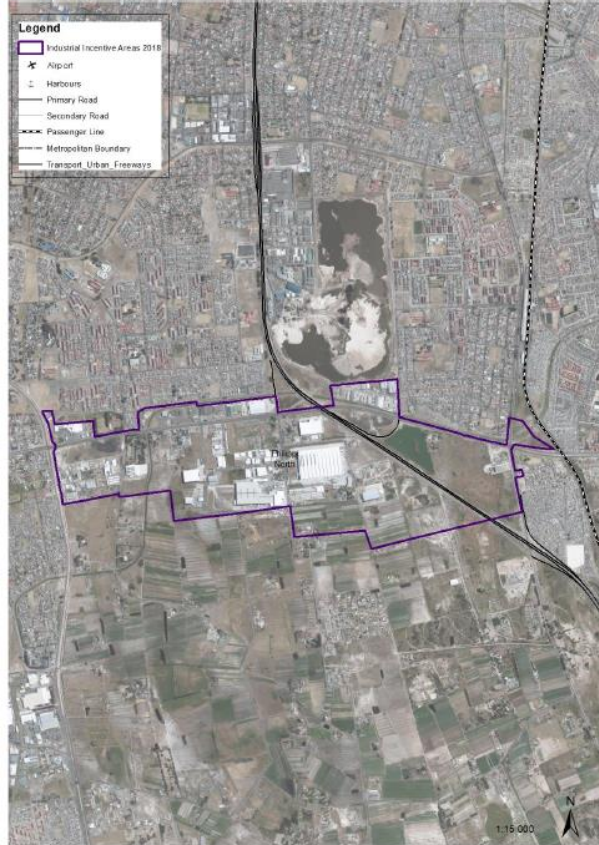
Elsies River



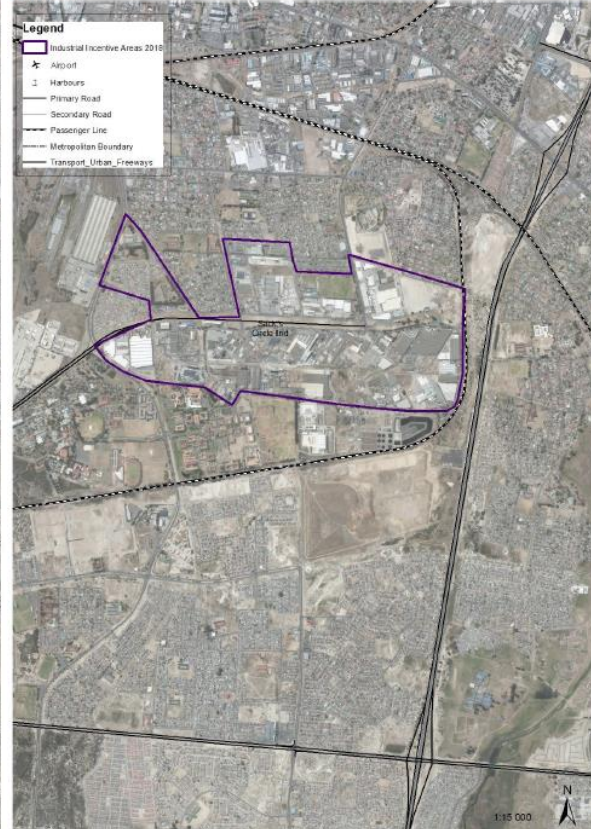
Parow Industria



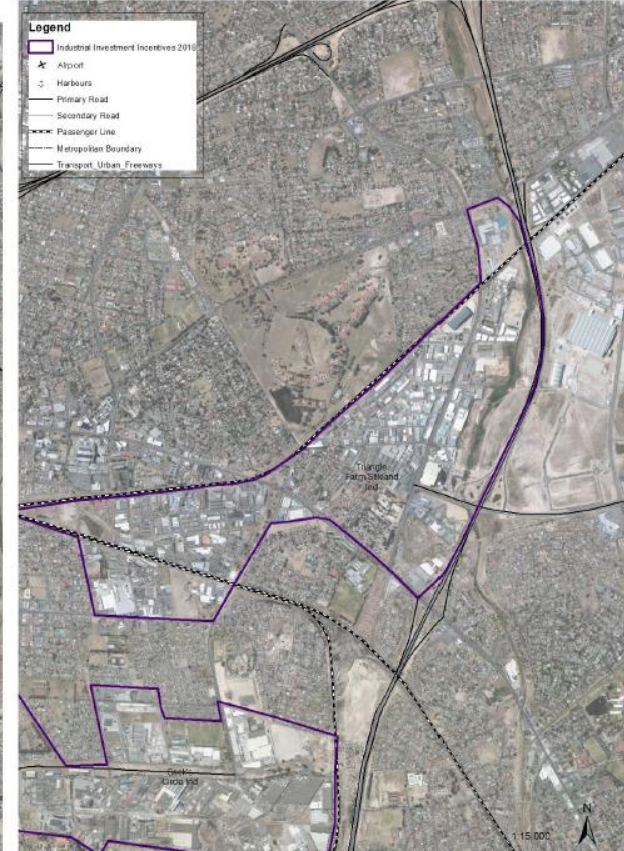
Philippi North



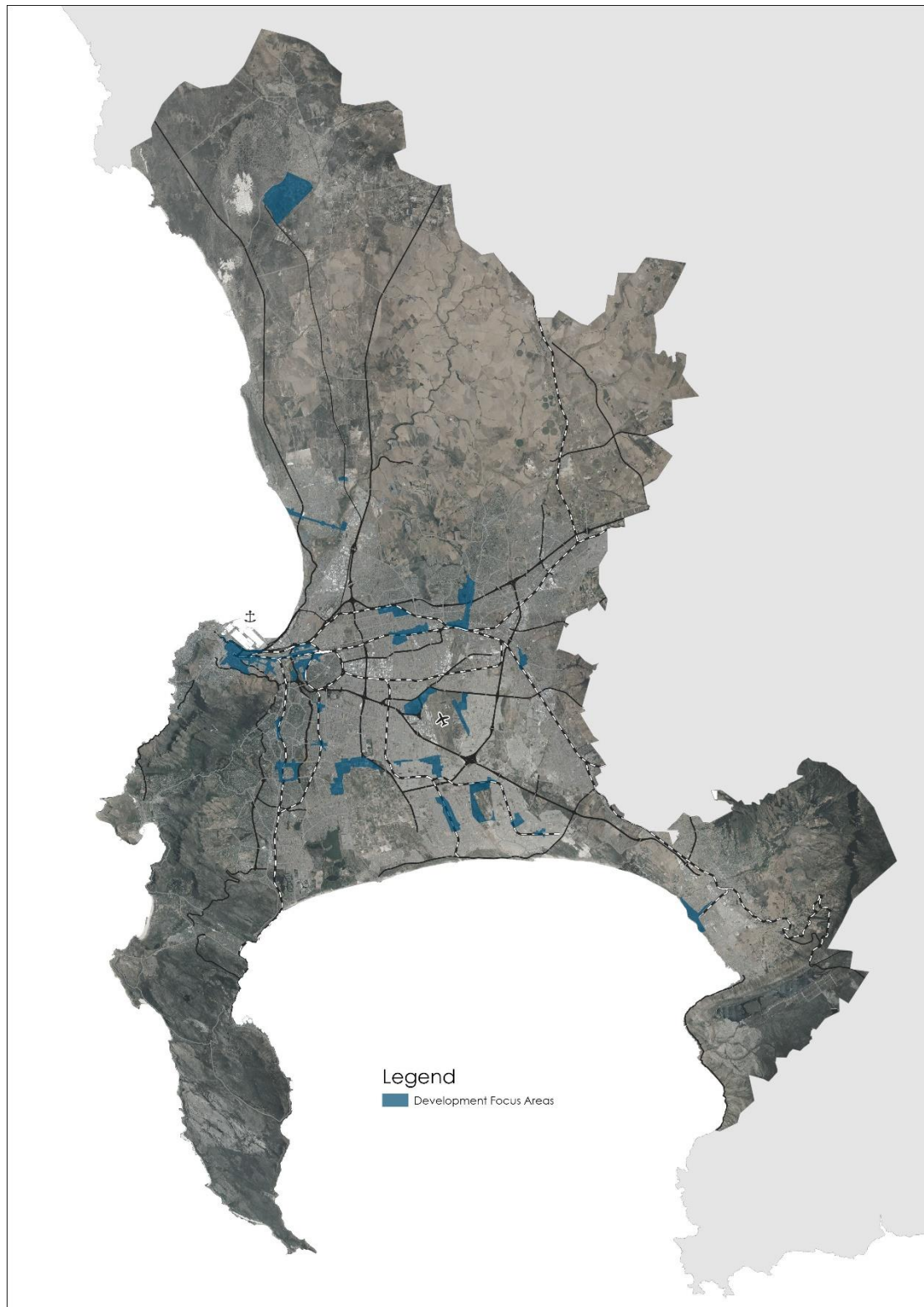
Sacks Circle



Stikland/Triangle Farm



Additional areas to be considered for the fast tracking of land use and building application approvals includes the Development Focus Areas. The following map displays Development Focus Areas across the Metro region.



Special Rating Areas (SRA)/City Improvement Districts (CIDs)

A SRA is a clearly defined geographical area in which property owners pay additional property rates to fund “top up” municipal services to improve or upgrade that specific area. SRAs can be commercial, industrial, residential or a combination of any of these and are known as Improvement Districts, City Improvement Districts, Business Improvement Districts, or Community Improvement Districts.

Focus Area:

- Community driven, local area scale intervention
- Commercial, industrial, residential areas (or a combination)
- Areas requiring/desiring improved services.

Project Type:

- A non-profit company provides "top up" services which typically include:
 - additional public safety;
 - cleansing services;
 - urban maintenance;
 - upgrading of the environment; and
 - social upliftment

Goal:

- a well-established institutional model and funding mechanism for communities who wish to enjoy municipal services of a higher level, and who are prepared to pay extra for these additional services. The purposes of a special rating area is to:
 - enhance and supplement the municipal services provided by the City;
 - facilitate investment in the special rating area;
 - facilitate a co-operative approach between the City and the private sector in the provision of municipal services;
 - halt the degeneration and facilitate the upliftment of distressed business and mixed-use areas;
- provide a framework to ensure the services provided remain affordable and sustainable.

a) How it works:

- i) An SRA is always initiated by the community and is run by the community for the benefit of the community, not by the City.
- ii) An SRA is managed by a specifically set-up Non-profit Company (NPC) with board elected by members of the NPC. Operations are undertaken by a management team appointed by this board. Property owners are required to sign up for NPC membership.
- iii) An SRA is funded from the additional rates paid by property owners within the boundary of the SRA. The contributions are based on the SRA's budget which undergoes an annual approval process. The City collects these additional rates on behalf of the SRA.
- iv) The City is not involved in their day-to-day operations, but merely exercises financial oversight and legal compliance. The City does not see its role as advocating or initiating the establishment of special rating areas, but rather

facilitating the process with guidance and advice and assisting and helping to capacitate management bodies.

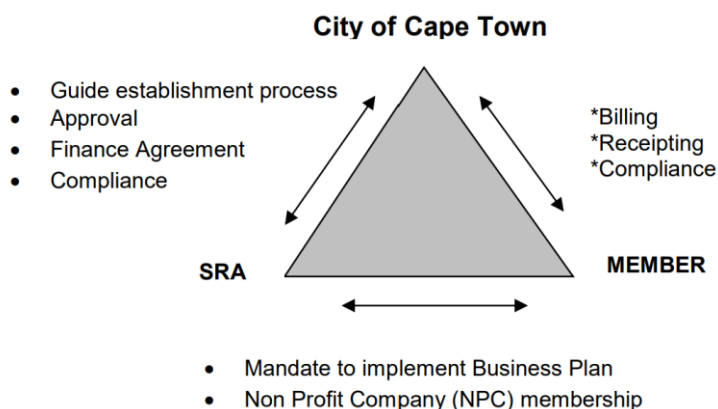


Figure 22 Overview of the relationship between the City, SRA and the member.

b) Costs or Risks

- Only minor administrative costs to the municipality.
- Potential risks associated with regeneration of areas.
- Requires a rates base that can support the SRA. (i.e. not applicable in all areas)
- Lack of local capacity / resources may undermine co-funding model.
- CIDs only effective where requisite human and financial resources exist within a precinct. May not be appropriate or feasible for smaller, more marginal precincts.
- Risk of 'shadow effect', whereby businesses and properties located adjacent to the CID area experiences a rise in crime-and-grime.

c) Preconditions (When to use it)

In communities with a sufficient rates base to support the SRA.

d) Timing

Not Applicable. The City does not initiate the establishment of the SRA, but rather facilitates the process at the behest of the community.

e) Approval and Application process

- Approval

SRAs are an existing mechanism governed by Section 22 of the Municipal Property Rates Act (MPRA), the Municipal Finance Management Act (MFMA), the Companies Act (Non Profit Company - NPC), the SA Constitution and the City of Cape Town's Special Rating Area By-law of 2012. The City also has the Special Rating Areas Policy 2017/18.

- Application

A community, or members thereof, are required to compile a five-year business plan (including the motivation report, the implementation plan and a budget) indicating

how the improvements are to be achieved, and present this at a public meeting. Thereafter a proportion of property owners are required to give written consent/support (50% in a commercial area, 60% in a residential area). An application is then submitted to the City for final approval process.

f) Advantages and Disadvantages

Advantages	Disadvantages
- Does not require utilizing any capital resources or debt to implement - Results in improved service delivery and urban management that does not require municipal finance - The cost of providing supplementary services will be borne by all property owners - Costs are borne in proportion to the value of the property - The Special Rating Area approach is holistic - The Special Rating Area creates a positive identity for the area - The Special Rating Area provides private sector management and accountability - The improvement of property values	- Requires a rates base that can support the SRA. (i.e. not applicable in all areas) - Lack of local capacity / resources may undermine co-funding model. - CIDs only effective where requisite human and financial resources exist within a precinct. May not be appropriate or feasible for smaller, more marginal precincts. - Risk of 'shadow effect', whereby businesses and properties located adjacent to the CID area experiences a rise in crime-and-grime. - In some areas there may be unintended consequences related to urban regeneration including increased rentals, and displacement of informal traders and the homeless.

g) Targeted Areas:

- i) There are several CIDs operating in the City in a range of communities, for example:
 - a) Athlone CID
 - b) Blackheath CID
 - c) Cape Town Central CID
 - d) Claremont CID
 - e) Epping CID
 - f) Groote Schuur CID
 - g) Maitland CID
 - h) Observatory CID
 - i) Paarden Eiland CID
 - j) Parow Industria CID
 - k) Sea Point CID
 - l) Triangle Farm City Improvement District
 - m) Vredeloof Community Improvement District
 - n) Woodstock CID
 - o) Wynberg CID
 - p) Zeekoevlei Peninsula SRA

12.8.1.4. Public Sector Investment Mechanisms

Catalytic Land Development Programme (CLDP)

Cape Town's CLDP is currently defined as a long term, comprehensive regeneration process aimed at tackling deep-seated social, economic, physical and environmental problems of market failure and deprivation which blights many inner-city communities.

Focus Area:

- A portfolio of 'priority TOD catalytic projects' of metropolitan significance, these being Bellville CBD Opportunity Area, Philippi Opportunity Area and the Foreshore Precinct;
- A portfolio of Level 2 TOD initiatives in local transit-accessible secondary precincts and nodes; and
- Other public land development opportunities around prioritised stations with high ridership that form part of the existing rail and BRT Station Typology Initiative proposed in partnership with PRASA and other role players.

Project Type:

- typically initiated by public sector, requiring government approval, support and co-ordination;
- capital intensive and unlikely to be undertaken by the private sector alone
- include high initial risk profiles with a return on investment difficult to predict with certainty, which mitigates against private sector participation;
- given their scale, can support government's socio-economic objectives, move the economy onto a new and more inclusive growth trajectory and stimulate employment opportunities; and
- requires unique delivery capacity/vehicles that enables infrastructure delivery in a commercially viable and sustainable manner.

Goal:

- the prioritisation of TOD and densification through residentially-led, urban compaction of catalytic, transit accessible precincts, supporting a fiscally sustainable public transport system and enabling a more productive, liveable and resource-efficient Cape Town;
- optimised efficiency due to the right mix and intensity of land uses in such catalytic precincts; and
- leveraging its strategically well-located landholdings and public partnerships to attract greater private sector participation to achieve TOD.

a) How it works:

- i) The CLDP is a portfolio-based approach to the prioritisation and assembly of TOD projects and programmes for the City, adopted on 31 July 2019 and developed in compliance with National Treasury's Catalytic Land Development Guideline.
- ii) The Catalytic Land Development Programme (CLDP), forming part of the City's TOD programme, will facilitate the creation of high-density, mixed-use development in spatially targeted, transit-accessible precincts and blighted economic nodes throughout the urban inner core, which, together with the requisite bulk infrastructure investment, will give effect to the TOD Strategic Framework (2016) over the medium to long term.

- iii) The CLDP requires a successful focus on people and places, a long-term approach, close partnerships, co-operation between public and private sectors, strong local leadership and the active involvement of communities.
- iv) The CLDP consists of several elements including the review of the of the previous TOD Catalytic Projects Programme, resulting in the prioritisation of three catalytic projects:
 - Bellville Opportunity Area
 - Philippi Opportunity Area
 - Foreshore Precinct

These will be followed by the next, supporting level of TOD initiatives, which will typically be smaller in size and/ or driven by the private sector. These level-2 initiatives might also have a more specific focus, such as housing or commercial.

The station typology initiative will see the development of public land in prioritised TOD precincts amongst the city's existing 98 rail and 40 BRT stations, in partnership with PRASA and other role players. It will contribute to improved urban efficiencies and sustainable transport services and forms another component of the CLDP.

Furthermore, the City will investigate and develop a suite of spatial incentives to support development in prioritised TOD precincts forming part of the Catalytic Land Development Programme (CLDP), to complement the City's existing Investment Incentives Policy. This will include investigating the potential of preferential development contributions in TOD locations, supply of serviced land, extending the Urban Development Zone (an accelerated depreciation allowance that seeks to stimulate development in blighted parts of the City), proactively applying exemption overlays where heritage impact is absent or limited, exploring the applicability of such concepts as 'Innovation Districts' in association with tertiary academic institutions to stimulate the 'knowledge economy', and the potential of 'Enterprise Zones' where appropriate.

- v) National Treasury through its City Support Programme (CSP) published guidelines for Metros formulating, preparing and implementing catalytic land development programmes. The guideline recommends a three phase approach to the catalytic land development life cycle:
 - 1. Phase 1: Spatial planning and targeting;

2. Phase 2: CLD programme preparation;
3. Phase 3: Implementing projects within the catalytic programme.

Currently Urban Catalytic Investment has focused on Phase 1 and 2. Applied to 3 previous sets of proposed 'catalytic' projects:

- 27 TOD Game changer sites;
- IDP Level 1 catalytic projects ("5+2" Revised = "3+2"); and
- PRASA "station typologies" initiative sites

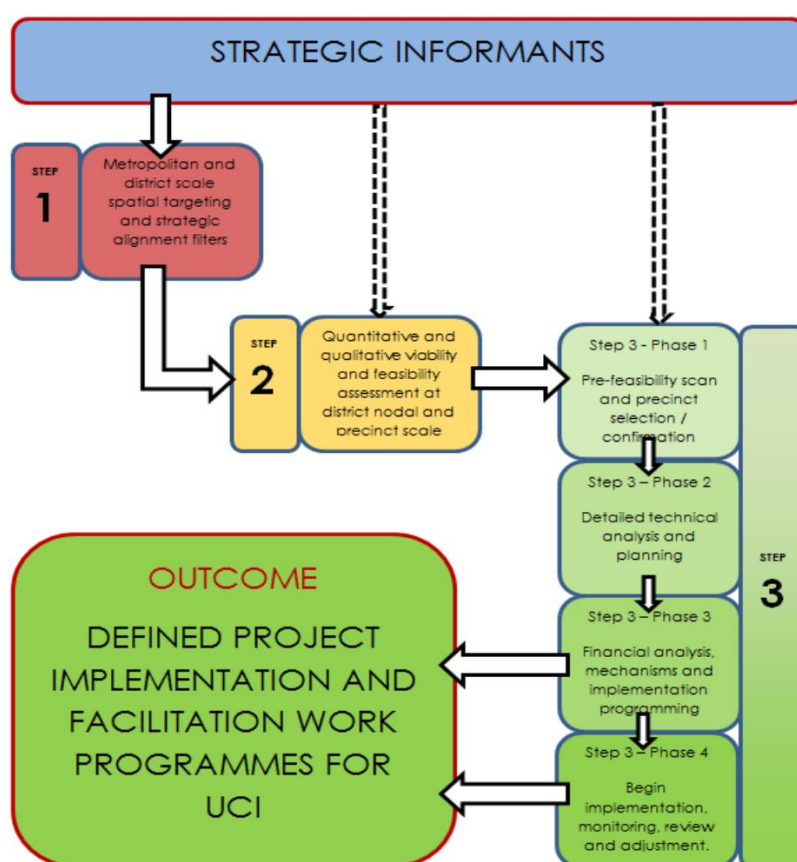


Figure 23: Overview of the CLDP Methodology

b) Costs or Risks

- i) Capital intensive.
- ii) include high initial risk profiles with a return on investment difficult to predict with certainty.
- iii) large scale projects with complex internal and external institutional arrangements.

c) Preconditions (When to use it)

Projects that are:

- i) typically initiated by public sector, requiring government approval, support and co-ordination;
- ii) capital intensive and unlikely to be undertaken by the private sector alone
- iii) include high initial risk profiles with a return on investment difficult to predict with certainty, which mitigates against private sector participation;
- iv) given their scale, can support government's socio-economic objectives, move the economy onto a new and more inclusive growth trajectory and stimulate employment opportunities; and
- v) requires unique delivery capacity/vehicles that enables infrastructure delivery in a commercially viable and sustainable manner.

d) Approval and Application process (where relevant)

- (i) Approval
- (ii) Application

e) Advantages and Disadvantages

Advantages	Disadvantages
• Programme to deal with strategically well-located landholdings. • Holistic approach and structured programme to project implementation and facilitation, a unique delivery capacity/vehicle. • Programme aims to ensure co-ordination between government institutions and the private sector. • Aims to attract greater private sector participation to achieve TOD. • Supports the City's policy objectives by incentivising dense development.	• Projects include high initial risk profiles with a return on investment difficult to predict with certainty • large scale projects with complex internal and external institutional arrangements. • capital intensive

f) Targeted Areas

- i) TOD precincts, where demand exists, land opportunity. E.g. Bellville PTI and surrounds
- ii) See list above and project portfolio.

Land Acquisition including Land Banking and Assembly

Focus Area:

- Areas where future land value is identified
- Infill development
- TOD precincts

Project Type:

- Areas where there is an identified need that the City can fulfil (i.e. public housing)
- Servicing of land parcels
- Areas with existing or planned public transport

Goal:

- The City seeks to facilitate public investment into capital projects.
- Land banking and assembly will prepare land for future projects and can be used as income generating either through disposal or leasing of packaged land.
- Additionally, this would encourage private sector development by displaying public sector willingness to enter into medium and long term infrastructure driven projects.

a) How it works:

- i) The City can buy property or rights in property (servitude) for municipal purposes. Examples of this are land parcels which are required to build roads, reservoirs, pipelines or housing projects.
- ii) Prior to purchasing a property or rights in property the City first has to collect information about the land property, including who owns it and what the land is worth and negotiate with the owner of the property to buy the land.
- iii) Mayoral Committee grants permission for the purchase of land. After the necessary permission is granted, a purchase agreement is drafted and signed by the two parties (City and owner).
- iv) Land banking and assembly entails that the City acquire aggregate parcels of land near or within strategic transit precincts where local development is expected to dramatically increase the plot's value.
- v) The banking of land for future use is useful especially in areas where the right type of development is not immediately possible.
- vi) As part of the land banking and assembly approach, large land holdings bought in recent years will be planned, subdivided and converted into projects in order to create integrated settlements.
- vii) The City can leverage its strategically located landholdings and partner with the private sector to lead by example in achieving TOD development.
- viii) Such investments will stimulate economic activity in support of growth, development and jobs, and unlock more affordable housing opportunities.

b) Costs or Risks

- i) Capital costs incurred in the purchasing of land for the proactive land acquisition strategy.
- ii) Additional capital costs are incurred in the holding costs, demolishing of structures, loss in rates income, opportunity costs.
- iii) Land banking and assembly requires the purchasing and packaging of land and selling leasehold rights to private developers. Cost to the City is in the purchasing of land and potentially the opportunity cost if there is no uptake from developers.
- iv) Administrative costs to the municipality, to ensure that land acquired by City line departments is used correctly and in the holding and managing of land.
- v) May be legal requirements for purchasing land for reinvestment by the municipal authority.

c) Preconditions (When to use it)

- i) When land value is favourable for public investment.
- ii) Where the municipality would like to encourage development of a public/social benefit not available through the private market.
- iii) There is sufficient operational capacity to structure agreements with the private sector

d) Timing

Both the acquisition of land by the City and the process of land banking and assembly occur prior to development occurring on the land.

e) Approval and Application process (where relevant)**i) Approval**

The process of asset acquisition is detailed in the City of Cape Town Policy on the Management of certain of the City of Cape Town's Immovable Property Policy (2010) A Land Acquisitions and Disposals Strategy is being drafted by the Property Management Department which will give further direction to the conditions and criteria applicable to the strategic acquisition, holding and disposal of land assets. Additionally, a consolidated land pipeline is required so as to better coordinate and align spatial and infrastructural planning.

ii) Application

The acquisition of land by the City should be done in line with the City's spatial vision and development objectives, specifically in line with the IDP, TOD framework and MSDf/DSDf. The development of a consolidated land pipeline will assist in ensuring that there is integration between spatial planning and infrastructure planning in the acquisition of land.

f) Advantages and Disadvantages

Advantages	Disadvantages
- Currently the City has the power to acquire parcels of land from external parties for specific municipal uses. - Useful tool for ensuring that long-term development goals are met - The City is able to direct specific forms of development on targeted parcels of land. - Land packaging/assembly is a practice utilised by the City to ensure that land parcels are directed towards their correct use	- Land parcels have been purchased from the private market, with a large mark-up, years after the City previously sold it Example? - Requires large capital investment by the City to both purchase the land and in the Capex required for planned projects - Expropriation has negative public perception - May require Special Purpose Vehicle to manage land acquired for land banking purposes.

g) Lessons Learnt

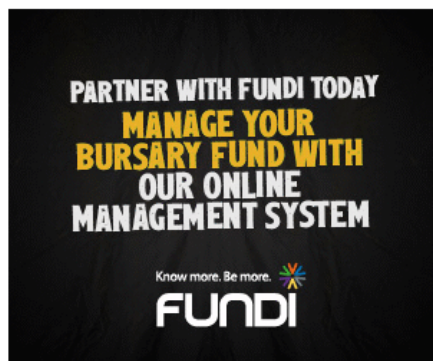
City land lying unused three years after R400m purchase

By Marvin Charles  Oct 2, 2018



Cape Town - The City of Cape Town has come under fire after buying land for R400 million in the Helderberg/Stellenbosch area in 2015 and three years later not indicating what it wants to do with it.

Chairperson of the Helderberg Residents Association Stephen Leppan said: "According to my observation they are still studying the land, but the city has not been forthcoming with information on what they plan on using the land for."



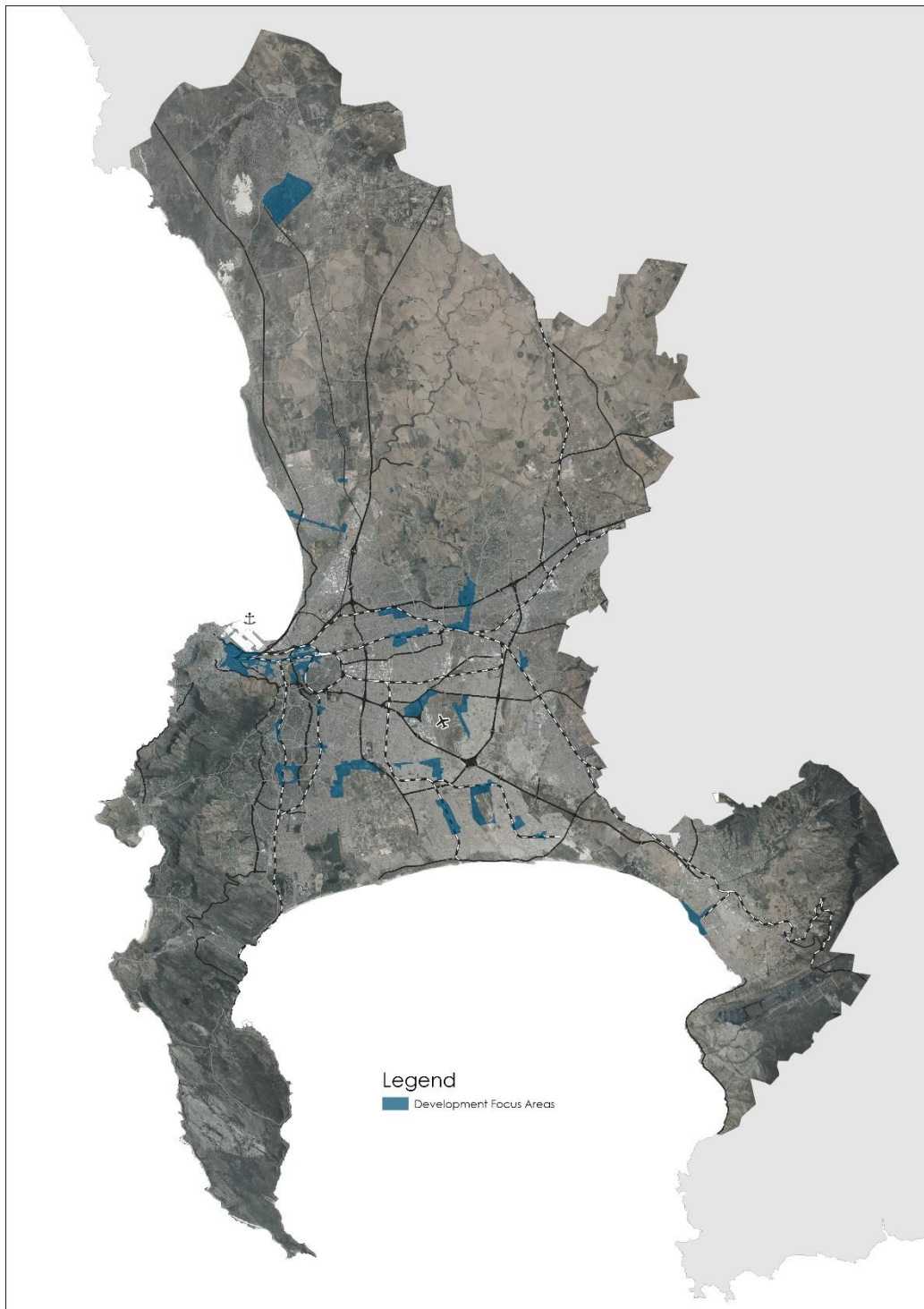
Leppan said the area was struggling with massive infrastructure problem in that there was a shortage of houses and schools.

According to documents in the possession of the Cape Argus, the City bought the land from Paardenvlei Properties on June 2015. The documents also state that the city was informed that parts of the land's ground water may be contaminated.

"The seller (Paardenvlei Properties) has made certain disclosures regarding the extent and nature of the contamination of the immovable property. The purchaser (the City) acknowledged that it had undertaken an

h) Targeted Areas:

- i) TOD Catalytic projects and Development Focus Areas
- ii) Integration Zone Precincts
- iii) Catalytic land



Precinct Management Model

A pilot a precinct management approach that will utilise Expanded Public Works Programme (EPWP) workers to address urban decay and improve areas so that they are clean, safe, functional and attractive.

Focus Area:

- Neglected Urban centres - CBDs, community nodes and town centres
- Urban areas experiencing decay without enough of a rates base to support the establishment of an SRA.
- local area scale intervention.

Project Type:

- Government driven urban management model
- Improving safety, quality of life and socio-economic circumstances
- Public infrastructure and facility maintenance

Goal:

- Precincts which are improved in a sustainable manner to make them clean, safe, functional and attractive, increasing economic activity and decreasing crime in the area.
- The overarching aim is to increase footfall and get people to reconnect with the space so that they visit it more frequently.
- The model aims to 'breathe life' into the precinct.

a) How it works:

- i) This holistic approach will utilise existing MURP methodologies in an innovative way by focusing resources on a small but significant area which can then be built on and expanded over time.
- ii) Currently the programme focusses on:
 - (a) precinct safety;
 - (b) cleaning & urban management;
 - (c) precinct beautification;
 - (d) marketing, communication & public relations;
 - (e) and events and activations.
- iii) This model will utilise EPWP workers over a two-year period (as opposed to the standard three-month contract). These individuals will be provided with accredited training in a variety of skills from safety and security, cleaning skills and rudimentary maintenance that are integral to the upkeep of buildings and spaces used by the public, to waste management and events logistics.
- iv) This model will also work together with existing initiatives like the Neighbourhood Safety Teams (NSTs). In addition, a series of different types

of events and activations of various scales will take place, aimed at building social cohesion and drawing positive energy into the area.

b) Costs or Risks

- i) Cost of the programme borne by the municipality and government partners.
- ii) Extensive Capex and Opex expenditure.
- iii) Requires ongoing management and dedicated resources from the Municipality.

c) Preconditions (When to use it)

- i) In areas requiring intervention to prevent urban decay or improve existing urban management levels that do not have enough of a rates base to support the setup of an SRA.
- ii) Neglected and dysfunctional areas that require upliftment.
- iii) Where there is sufficient capacity in the municipality to assign a dedicated team to administer the program.

d) Approval and Application process (where relevant)

- (i) Approval
- (ii) Application

e) Advantages and Disadvantages

Advantages	Disadvantages
• A holistic approach to precinct management that ties in with a variety of existing City programmes. • Provides skills and jobs as part of the EPWP structures. • Falls within the existing City structures (MURP and Subcouncil structures.)	• Requires a direct revenue source for a municipality (both capex and opex) • Requires sufficient capacity in the municipality to assign a dedicated team to administer the program. •

f) Lessons Learnt

- i) Pilot the precinct management model in the Bonteheuwel CBD

g) Targeted Areas

- i) Aim to commence the model in the precincts of Bonteheuwel Town Centre and Bishop Lavis in November 2020.
- ii) Aim to roll-out Precinct Management as part of the Mayor's Visible Service Delivery Acceleration Programme (MVSA), which has been adapted to meet local conditions in 23 areas.

Mayoral Urban Renewal Programmes (MURPs)

City programme that employs short term urban management solutions and oversees the development of a more comprehensive community action planning process in identified Areas of Focus. The programme aims to uplift areas that have been identified as neglected and dysfunctional through coordinated service delivery and operations within spatially defined area.

Focus Area:

- Neglected and dysfunctional urban areas – specifically CBDs, community nodes and town centres
- Degraded public transport interchanges and commercial corridors

Project Type:

- Urban stabilisation through public infrastructure and facility maintenance
- Set up of Area Coordinating Task Teams
- Improving safety, quality of life and socio-economic circumstances

Goal:

- The objective of MURP is to uplift former neglected and dysfunctional areas.
- Provide a platform for effective public and private investment.
- Unlock immediate action through transversal cooperation between line departments and improved partnerships with communities, and to concurrently plan for the future of the area based on a participatory approach.

a) How it works:

- i. MURP employs short term urban management solutions and oversees the development of a more comprehensive community action planning process in identified Areas of Focus. that draw from the best practices developed under the Violence Prevention through Urban Upgrading Programme
- ii. process premised on a strong social crime prevention approach. The programmes aims to progress towards the realisation of a community policing programme and integrated neighbourhood safety programme based on the work piloted by MURP in areas presently suffering from severe gang activity.
- iii. the programme plays a catalytic or 'unblocking' role around minor urban management issues that struggle to receive attention.
- iv. These investments are articulated in a package of interventions which are negotiated with communities and incorporated into "Community Action Plans

- or Area Strategies" via the establishment of Area Coordination Task Teams or ACTTS in each identified Area of Focus.
- v. MURP focuses on hotspot areas where the social fibre has broken down.

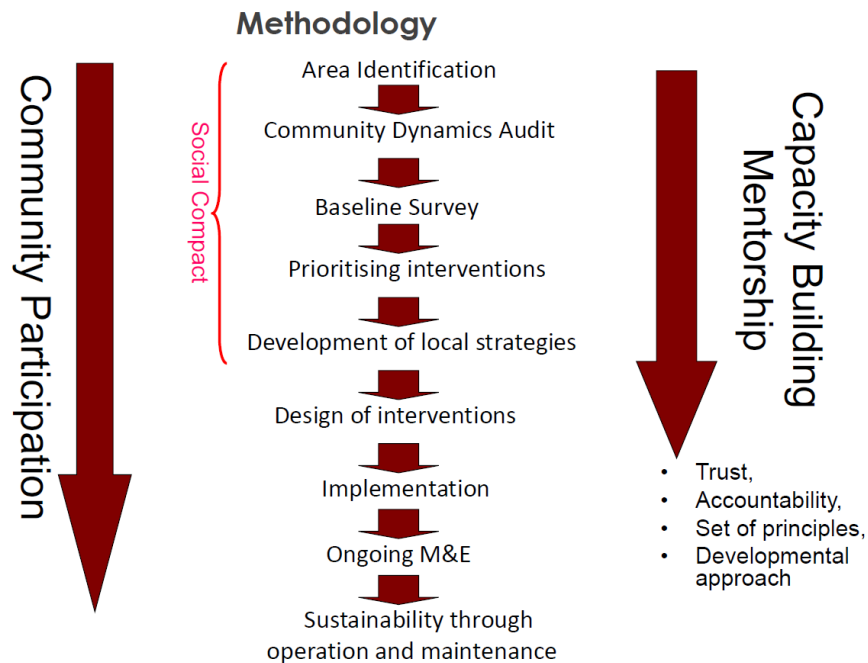


Figure 24: Methodology

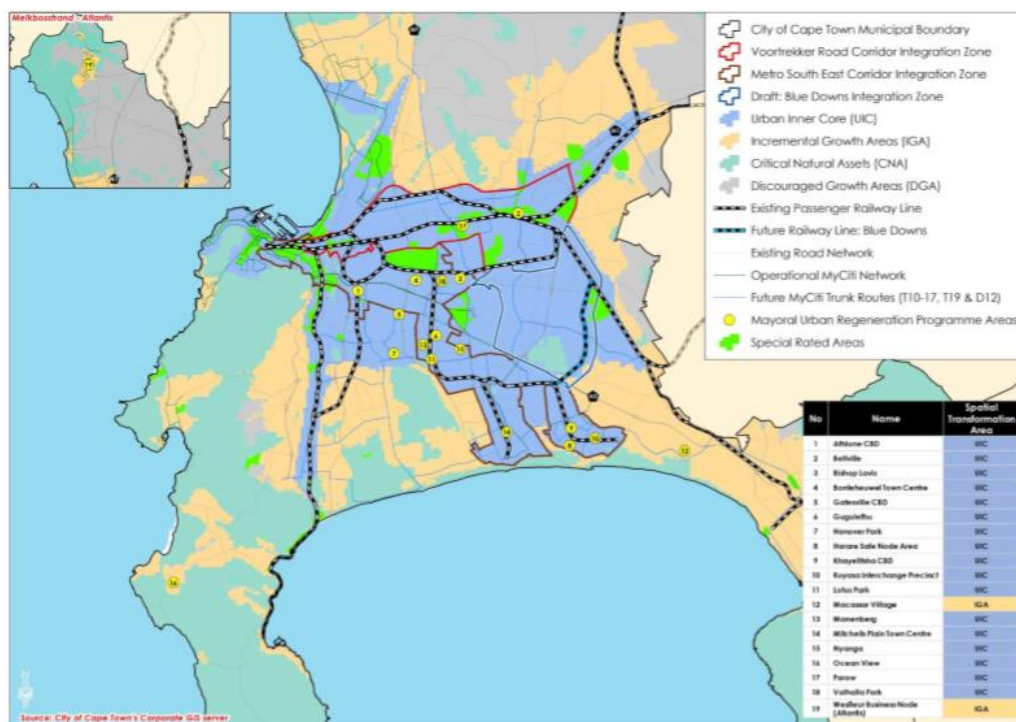


Figure 25: MURP Areas

b) Costs or Risks

- i) Capex and Opex expenditure required.
- ii) Lack of funding may impede project progress.
- iii) Requires institutional capacity and management
- iv) Differential with respect to levels of service provided in MNURP Focus Areas relative to other areas in City.

c) Preconditions (When to use it)

- i) In neglected or dysfunctional areas across the metro.
- ii) Specifically, in environments that have become conducive for criminality and violence where proactive and positive urban management has become almost impossible and where the rule of law is difficult to achieve for the benefit of residents.
- iii) Lack of alternative funding sources for improved urban management.
- iv) If areas are chosen where there is a current investment focus then there is a chance that through a more integrated approach to planning and design, sustainable operations and maintenance becomes possible.

d) Approval and Application process (where relevant)

- (i) Approval
- (ii) Application

e) Advantages and Disadvantages

Advantages	Disadvantages
• By improving the quality and reliability of basic service provision, market uncertainty is reduced and perceptions improved. • Results in the development of a public or a social good and the upliftment of neglected areas • Encourages the maintenance of public infrastructure and facilities. • Holistic approach to urban management. • Provides a co-ordinating platform.	• Ongoing Capex and Opex expenditure. • Requires institutional capacity. • Working in volatile environments. • Precondition for regeneration but not sufficient in itself.

f) Lessons Learnt

- i. MURP areas include Athlone CBD, Bellville transport interchange and Voortrekker Road corridor, Bishop Lavis, Valhalla Park, Bonteheuwel, Gatesville CBD, Harare and Kuyasa transport interchanges, Macassar, Manenberg, Hanover Park, Mitchells Plain Town Centre, Nyanga/Gugulethu, Ocean View, Parow and Wesfleur business node (Atlantis).
- ii. MURP often works alongside the Violence Prevention through Urban Upgrade (VPUU) programme.

g) Targeted Areas

- i) Areas of infrastructure neglect i.e. Dunoon.

12.8.2. PROPOSED MECHANISMS

The mechanisms described in this section have passed through the rapid screening process and were deemed to be suitable both in terms of the time required for them to be developed as well as their potential for use. These mechanisms are either, currently in the process of development or investigation by the City or should be investigated in more detail prior to pursuit and implementation. It should be noted that this is not an exhaustive list of mechanisms and this does not preclude the investigation of other mechanisms to support the City's urban development vision. Timeframes for approval (for mechanisms under current investigation) and investigation of future mechanisms are indicated as either A, B or C, where A refers to those mechanisms which can be approved in 1 – 2 years, B indicates those that can be approved in 2 – 5 years and those that are timeous to be investigated but can be done within the lifespan of the District Plans are noted as C, or 5 – 10 years.

Table 17 Proposed Mechanisms and Expected Timeframes

Mechanism	Timeframes: A: 1-2 years, B: 2-5 years, C: 5-10 years
DEVELOPMENT INCENTIVES	
Integrated Incentive Overlay Zone	A
Scheduled Public Transport Accessibility Overlay (SPTAO)	A
Inclusionary Housing	A
Density Bonus	A
Proactive Rezoning/Upzoning	A
Heritage Exemption Areas	B
Environmental Exclusion Areas	B
Tax Abatements (other than the UDZ)	C
INCOME GENERATION	
Land Readjustment Scheme	C
Land Redevelopment Scheme	C
INSTITUTIONAL	
Enhanced Process of Land Release and Acquisition	A
PUBLIC SECTOR INVESTMENT	
Aligned Public Sector Plans	A

12.8.2.1. Development Incentive Mechanisms

Overlay Zones

Focus Area:

- Urban areas / Districts / Corridors
- Environmental / heritage areas for conservation and protection
- Historical districts, natural resource and green infrastructure protection, and economic development
- New development Areas

Project Type:

- Encourage mixed use developments within a district
- Preserve / enhance natural areas
- Preserve / enhance sensitive / wildlife habitat
- Protect groundwater resources and protect quality of surface water
- Affordable Housing along transit routes and corridors

Goal:

- The goal is to provide regulations or incentives to protect a specific area or guide development within a special area.

a) How it works:

- i) Overlay zoning is a regulatory tool that creates a special zoning district, placed over an existing base zone(s), which identifies special provisions in addition to those in the underlying base zone.
- ii) An overlay zone is a zoning district which is applied over one or more previously established zoning districts, establishing additional or stricter standards and criteria for covered properties in addition to those of the underlying zoning scheme.
- iii) The CCT often use overlay zones to protect special features such as historical areas and buildings (Bo-Kaap Heritage Protection Overlay Zone), wetlands and waterfronts.
- iv) Overlay zones can also be used to promote specific development projects, such as mixed-used developments, waterfront developments, housing along transit corridors, or affordable housing.

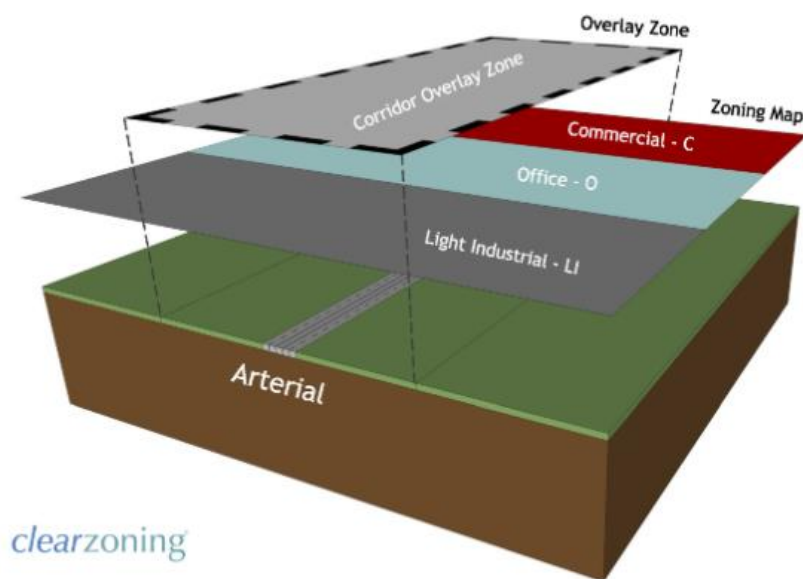


Figure 26 Applying an Overlay Zone

b) Costs or Risks

Overlay zones can create inefficiencies and inequities by applying regulations and restrictions to some properties and not others. Moreover, additional regulations may increase time and expense both for developers and for the City department(s) involved in the development approval process.

Overlay zones are excellent tools for where the base zones are compatible with the desired future. However, where the base zones are not compatible with the future vision, it might be necessary to modify the zoning of the properties.

c) Preconditions (When to use it)

Effective in boom periods during areas of growth pressure.

Effective when trying to reach a specific goal i.e. protect sensitive environmental / heritage area. Effective when trying to reach higher densities in certain urban areas and when the City want to incentivize development.

d) Timing

Overlay Zones are implemented to address a specific problem or to incentivize development within a specific area. The timing should therefore be done beforehand to ensure that it protects / address the problem it envisaged to protect or to guide the development it aimed to achieve. Once it is implemented it will stay in place for perpetuity.

e) Approval and Application process (where relevant)

Overlay zones should be used responsibly to avoid unnecessary confusion and administrative complications. Before applying an overlay zone, Council must follow procedures laid down in zoning scheme, which includes consultation with community and property owners.

S 148 in the CCT MPBL indicate the following as it relates to the approval / application of Overlay Zones"

(1) Preparation of an overlay zoning shall take into consideration the following requirements where applicable:

(a) the development principles contained in the SPLUMA, the LUPA and the CCT Municipal By-Law;

[Para. (a) substituted by s. 55 of City of Cape Town: Municipal Planning Amendment By-Law, 2016]

(b) the City's planning vision and principles as set out in its Integrated Development Plan;

(c) desired spatial form, including but not limited to the development of public and private land, infrastructure investment, utilisation of space, spatial reconstruction, location and nature of development, urban edge, scenic routes, green infrastructure corridors, areas of strategic intervention, mitigation of development impacts;

(d) the principles as set out in an approved spatial development framework or a policy plan;

(e) environmental and heritage protection and conservation; and

(f) the principles of co-operative governance and the duties and objectives of local government as set out in the Municipal Systems Act and the Constitution of the Republic of South Africa, 1996.

(2) An overlay zoning must not detract from the City's ability to serve the needs of the municipal area as a whole.

S 152: Process to designate a land unit, area or the city to have an overlay zoning

(1) The City may, after following a notice procedure contemplated in section 81 of this By-Law and after considering the objections, comments or representations received, designate a land unit, area or the City to have a specified overlay zoning.

(2) Prior to designating a land unit, area or the city, the City must have regard to any approved policy plan dealing with the specified overlay zoning.

i) Approval

S81 Development rules

The following development rules apply:

(a) The City may require a site development plan for a primary use, and shall require a site development plan for a consent use application.

(b) The site development plan as approved by the City shall constitute the development rules for a primary use if applicable, and a consent use.

(c) The provisions for a site development plan in item 123 shall apply.

ii) Application

Overlay zones should be used responsibly to avoid unnecessary confusion and administrative complications. Before applying an overlay zone, Council must follow procedures laid down in zoning scheme, which includes consultation with community and property owners.

- Council may apply the general provisions stipulated in a density overlay (DO) zone and subdivisional overlay zone (SAO) in terms of the Cape Town zoning scheme regulations.
- Subdivisional area overlay zone (SAO) confirms the principle of development and acceptance of future subdivision of land, but not detailed layout, which will be determined when an actual application for subdivision is approved.

•

The City Council (after following required public participation with IAPS) have the power to create an overlay zone. There are three basic steps to creating an overlay zone:

Define the purpose of the area / zone. The area should have a clearly defined purpose e.g. to protect drinking water, preserve historical character / heritage, densification, affordable housing, etc.

Identify the areas that make up the zone. Mapping boundaries will depend on the natural or cultural resources and the geographic areas that relate to achieving the purpose of the zone. For example, if the purpose of the zone is to protect the heritage of a certain area (Bo-Kaap), a detailed analysis would have to be done about edge delineation / what should be included and excluded.

Develop specific rules / guidelines that apply to the identified area. In a groundwater recharge district for example, provisions may restrict development or require development guidelines that capture and filter water runoff.

f) Advantages and Disadvantages

Advantages	Disadvantages
• Allows existing zoning regulations to be superseded or complemented to solve a known problem. • Can implement comprehensive plan policies and strategies associated with future land use and the environment. • Relatively easy to maintain over time following initial adoption.	• Does not create a direct revenue source for a municipality • Does not help pay for a municipality's infrastructure needs • Not useful in weak markets where developable land is abundant and there is low demand for dense development, i.e. where developers can easily develop market-rate housing at lower densities and gain a decent profit, and they do not need additional density as an incentive.

g) Targeted Areas

Development Focus Areas:

- At this scale of planning the spatial designation of the Urban Inner Core should be refined to areas of 'development focus' or priority, i.e. Development Focus Areas for the period of the DSDF (10 year cycle).
- Targeted areas for urban restructuring that have the highest potential spatial transformative impact (*i.e. addressing issues of spatial fragmentation, inefficient urban form and segregation by integrating communities and increasing opportunities to a greater number of people in highly connected areas*)
- **Areas linked to projects with a multi-sectoral focus** where there is funding available (be it operational and/or capital), or funding to be applied for, **for planning that will give rise to implementation (i.e. LASDFs, Precinct Plans etc.)**. (Planning work should at least commence within the lifespan of the DSDF)
- Priority Areas of Opportunity as **identified in CLDP and Integration Zones** that would serve as catalysts to unlock the potential for integrated development with cross-cutting benefits e.g. Bellville PTI, Philippi East.
- Areas with highest levels of accessibility (*i.e. within nodes and along development corridors.*)
- Potential to attract private sector investment

Scheduled Public Transport Accessibility Overlay Zone

Focus Area:

- **Low intensity area:** land units that are adjacent to or in close proximity of identified activity routes or streets and structuring routes as designated on the SPTA map (i.e. it does not have to be along an activity route or street or structuring route).
- **Additional use rights for low intensity areas:**
Land units with a zoning of Single Residential 1 and 2 -
 - office, guest house, place of instruction and service trade; andLand units with a zoning of Single Residential 1 -
 - house shop.
- **High intensity area:** land units that are adjacent or in close proximity to identified activity routes or streets and structuring routes as designated on the SPTA map.
- **Additional use rights for high intensity areas:**
Land units with a zoning of Single Residential 1 and 2 -
 - office, guest house, restaurant, service trade and place of instruction; andLand units with a zoning of Single Residential 1 -
 - business premises.

Project Type:

- Regulatory tool to facilitate small and micro enterprise development within designated scheduled public transport accessible routes.

Goal:

- As part of the City's Development Management Scheme (DMS), the SPTA overlay zone enables the initiation of processes to designate properties / areas along identified routes to be managed under this overlay. This is aimed at implementing the City's strategy goals around creating an enabling economic environment, especially for small and micro-enterprises. Under this overlay zone, property owners in identified areas seeking to start a formal small business, or formalise an informal business, will now have specified business uses as a primary right and need not to go through a rezoning or consent use application process.
- The purpose of the SPTAO is to make provision for the development of small and micro enterprises within the SR1 and SR2 zonings in city blocks along selected activity routes / streets and structuring routes approved by the City.
- Furthermore, the aim is to provide land use rights on behalf of property owners in an area where the likelihood and potential for individual owners to do so was low, but where the opportunity for business growth was high.
- The SPTAO provides rights to SMME that operate in the informal economy as illegal businesses to enable them to regularise the business to being legal

a) How it works:

SPTAO is an appropriate planning tool to promote the establishment of small business enterprises in residential areas with the purpose of encouraging economic activity at the local scale.

Enable small scale intensification of land uses in an incremental manner along an activity route, a development route or a structuring route.

The overlay will recognise existing small enterprises in these areas

The SPTAO will remove barriers / reduce the regulatory burden on the City.

Enable property owners to capitalise on their locational advantages to establish as of right small scale business enterprises that are broadly compatible with residential neighbourhoods.

The SPTAO make provision for the development of small and micro enterprises within the Single Residential Zones 1 & 2.

i) Criteria for designation of areas:

The provisions of the MPB-L 158D (1) to (4) reflect the basis for the designation of areas to be managed under the SPTA Overlay Zone (e.g. properties adjacent to activity routes, activity streets or structuring routes).

b) Qualifying Criteria

High intensity residential land units and low intensity residential land units (i.e. Single Residential 1 and 2 zoned properties) as depicted on the scheduled public transport accessibility map and as designated to have this overlay zoning are subject to items 158C, 158D and 158DA within the MPB-L.

c) Costs or Risks

Changing the land use rights of a property may have financial implications for property owners- both in terms of the rates they are charged and the valuation of their property (and by implication, the potential resale value of their property).

Practical challenge is to obtain power of attorneys from the property owners to act on their behalf. Title deeds in townships often do not reflect the correct property owner. Many residents in townships received government-sponsored houses that legally cannot be sold for the first 7 years. Informal transfers are common, resulting in a category of property owners that do not have formal title. Even in cases where government-sponsored houses have not been sold on, complications arise where multiple family members inherit a property.

d) Preconditions (When to use it)

Land unit is in area identified on the scheduled public transport accessibility route map: The identification of areas which are either high intensity or low intensity must comply with the general provisions of the Overlay Zone as provided for in terms of item 158C, 158D and 158DA) of the DMS in terms of their location in relation to the routes designated in terms of the scheduled public transport accessibility map. The City's

municipal services departments must certify that capacity is available on the services network in the specific area, for the additional primary uses.

e) Timing

The activation of this overlay zone is subject to the approval of the SPTAO map.

f) Approval and Application process (where relevant)

i) Approval

The SPTAO is subject to the City's approval of a scheduled public transport accessibility map which indicates high and low intensity residential land units.

ii) Application

Overlay zones should be used responsibly to avoid unnecessary confusion and administrative complications. Before applying an overlay zone, Council must follow procedures laid down in zoning scheme, which includes consultation with community and property owners.

To guide implementation of the overlay zone, it is proposed that the following standard process be supported, which aligns to the requirements of the MPBL:

a) Utility departments are engaged and requested to provide comment on the capacity of the local utility networks and the potential impact on services as part of the public consultation process. The extent of the overlay zone is amended if required.

b) The Mayor / Mayco member / or Delegated authority is briefed on the proposed areas for designation. The Delegated Authority provides support for initiation of designation for areas indicated.

c) Department finalises documentation for advertising the intended SPTAO designation to affected property owners / communities liaising with the Public Participation Unit as required.

d) Once draft proposals are complete, formal public consultation occurs (e.g. by means of advertising in the media, registered mail to IA&Ps and public consultation meeting), including a report to the relevant Sub-councils.

e) Upon completion of the consultation period, the final report dealing with the public comments is submitted to the relevant portfolio committee for recommendation to the Executive Mayor and the Mayco, recommendation is submitted to Council for a decision.

f) Once adopted by Council, the areas designated to be managed under the SPTAO would be published in the Provincial Gazette and placed on the City's website in line with s24(4) of the MPBL.

g) Advantages and Disadvantages

Advantages	Disadvantages
• Allows existing zoning regulations to be superseded or complemented to solve a known problem. • Can implement comprehensive plan policies and strategies associated with future land use and the environment. • Relatively easy to maintain over time following initial adoption.	• Overlay zoning often requires a higher level of technical expertise to administer. • Adds an additional layer of requirements to the development review process. • Requires a zoning amendment, which requires formal action by the CCT.

h) Case Study: Lessons Learnt

The Eveline Street (Windhoek, Namibia) case study provides some land use management lessons for South Africa, for streets that are already transport corridors/high streets:

1. Ensure secure business and land rights, so micro-entrepreneurs will not face repercussions if they invest in business infrastructure or growth
2. Rezone residential township properties in business corridors, to create mixed-use or commercial areas that accommodate multiple uses of land and a mix of businesses
3. Use licensing regulations as a tool to manage land use and encourage private investment.
4. Modify the existing urban infrastructure, to support development, e.g. wide pavements (for off-street parking and economic activities), varying plot sizes, street lighting, and space for expansions and alterations.
5. Develop an efficient, accessible and flexible public transport system that can support growth, facilitate economic inclusion and connect nodal points of activity.

i) Targeted Areas

- Along structuring routes within neighbourhoods, activity streets or development routes
- Experience high levels of pedestrian foot traffic, particularly those close to public transport services.
- Latent economic activity or pressure for business uses.
- Access to the property is not likely to have significant impacts on the mobility and accessibility network.
- Alignment to areas targeted for greater diversity (mix) of uses in support of the TOD Strategic Framework.
- Areas that are designated in the SPTAO are already serviced and impact on municipal services capacity is considered manageable.
- Potential negative impact on surrounding land uses is avoidable or manageable.

Inclusionary Housing Policy

Focus Area:

- Low-income areas within urban inner core
- Areas well located to employment opportunities.
- Areas located in proximity to PT facilities.

Project Type:

- Private property
- New developments
- Potentially redevelopments/conversions
- Rental
- Ownership
- Multifamily
- Single-family
- Market-rate

Goal:

- Encourage affordable housing development in areas where the local government has identified a shortage of housing affordable to low- and moderate-income households

a) How it works:

- i) There are two suggested options for the affordable housing contribution namely:
- ii) **On-site** (affordable units developed as part of the market development)
OR
- iii) **Fees in lieu** will apply (monetary contribution which will be ring-fenced into a municipal fund for the development of affordable housing).
- iv) It is likely that the City will prescribe the choice between on-site and fees in lieu based on the scale of affordable housing contribution or the location of the development. If the development is of a certain scale and location then on-site will be mandatory; however, fees in lieu will apply if the affordable housing contribution is below a certain scale, or in undesirable locations.
- v) Potential incentives available to developers may include, amongst others:
 - 1) Density bonus (proactively embedded in overlay zone, and granted through normal processes outside of the overlay zone)
 - 2) Reduced parking requirements
 - 3) Changes to use restrictions and regulations governing the building envelop or building form.
 - 4) Fast-tracking approvals process

- 5) Reduction in development charges for the affordable housing portion of the development
- vi) This policy will likely use a standard definition of affordability across the City amounting to a monthly household income of R22 000 and below. Possible that sub-categories of household incomes below R22 000 will be targeted in this policy to ensure a spread of income groups benefit from this policy.
- vii) It is likely that on-site affordable housing generated by this policy will target higher income of around R15 000 – R22 000 monthly household income, whereas fees in lieu can be used to provide affordable housing for lower income earners.

b) Costs or Risks

- i) Administrative costs in ensuring compliance with policy and potentially managing rental stock.
- ii) Adverse market risk if property sector isn't able to factor the economics of building such stock.
- iii) A combination of different sets of legislation (Housing Act/MATR) may be necessary for the release of City-owned land.0020
- iv) Potential restrictions on sales of inclusionary housing.

c) Preconditions (When to use it)

- i) An Inclusionary Housing Overlay Zone (IHOZ) will be created. This overlay zone will align to:
 - (1) Areas of the City with strong property markets (where there is existing value)
 - (2) Strategically important transit-oriented development nodes, where density is desired
 - (3) In areas with appropriate public education, health, social facilities, and near employment opportunities
- ii) Within the IHOZ, development rights will be up-zoned above the existing rights, to a set threshold. If developments use the additional rights within the overlay zone, a proportion of those rights (still to be determined) will be reserved for affordable housing.
- iii) In the rest of the City, an inclusionary housing requirement will be triggered when new rights are granted over a certain threshold (still to be determined).
- iv) Strong urban land market:
 - (1) % change residential property value, 2012-2018
 - (2) High property values per m2, 2018
 - (3) High residential rental returns, 2018
- v) However, this will be reviewed following COVID-19

d) Timing

- i) During development in the case that on-site units are provided.
- ii) Fees allocated to ring-fenced fund will require additional planning and consolidation.

e) Approval and Application process (where relevant)

i) Approval

Policy yet to be approved. Currently in various phases of research and market analysis. Will be a long process due to its complexity and the fact that various role players will be involved. The Inclusionary Housing Policy will have to go through extensive public participation and it may take a considerable time for the developer and the public sector to reach an agreement. This policy is anticipated to go for approval at the same time as the DSDFs.

ii) Application

Voluntary: Incentives are used however, then developer must do affordable contribution.

Involuntary: Applies City-wide, but different implementation triggers:

- Overlay Zone: pro-actively up-zone development rights to a set threshold above existing zoning scheme - if developer uses additional rights then a proportion is reserved for affordable housing
- Rest of the City: I.H. triggered when new rights are granted over a certain threshold

f) Advantages and Disadvantages

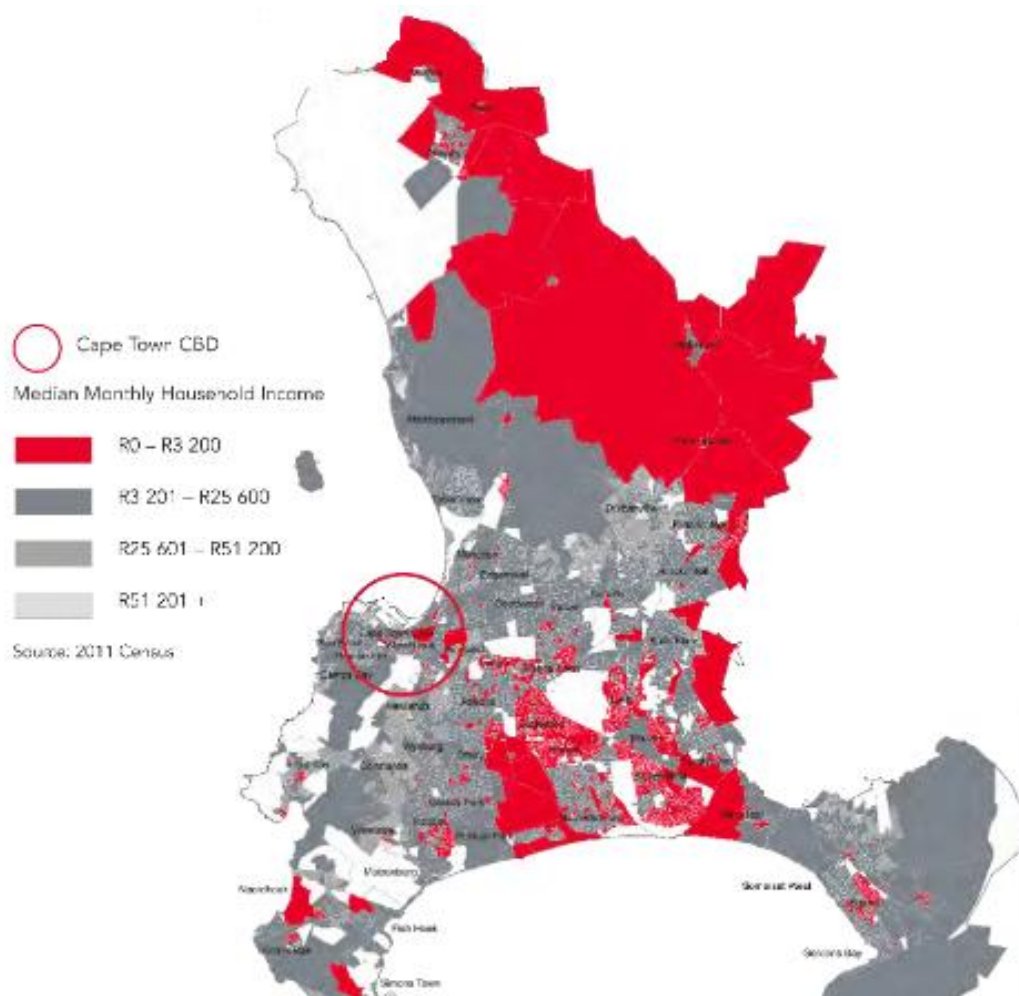
Advantages	Disadvantages
• Does not require capital investment by the City. • Is a step towards addressing housing backlog • Enables spatial justice in land use decision-making • Increases supply in affordable housing • Inclusionary housing can contribute towards the City's density objectives	• Is not a revenue generating mechanism • Does not help pay for a municipality's infrastructure needs • Not useful in weak markets where developable land is abundant and there is low demand for dense development, i.e. where developers can easily develop market-rate housing at lower densities • Private developers may reject parts of the proposed policy. • Private developers not willing to participate because the portion of inclusionary housing units/fees in lieu may be deemed to high and therefore

	the developer does not consider it worthwhile. • Uncertainty allocation of units and the portion of housing units allocated to the affordable income group. • Policy uncertainty / red tape driving away investment.
--	--

g) Targeted Areas:

IHOZ yet to be developed, but **potential** spaces include:

- Urban Inner Core and Consolidation areas.
- Structuring zones
- Public transport accessibility
- Areas with access to employment opportunities, social amenities



Proactive Rezoning/Upzoning

Focus Area:

- Urban centres
- Areas considered to have high growth potential and that are targeted over the medium to long term as new development areas.

Project Type:

- Depending on the end goal, but usually applicable to areas where the Municipality would want to incentivize development / densification
- Development corridors
- Mixed use Nodes
- Low density residential (SR1) areas which requires densification GR1

Goal:

- Increasing the development rights assigned to a specific property or properties.

a) How it works:

- i) Upzoning is defined as the process of increasing the development rights assigned to a specific property or properties, and proactive, as this is a state-initiated process, as opposed to a process initiated by a property owner.
- ii) Upzoning is the process where the rights assigned to a specific property are increased. For example, if a property zoned Single Residential, which only permits one dwelling unit, is rezoned to General Residential, allowing for many dwelling units on the property, the property has been upzoned.
- iii) Proactive refers to instances where the municipality, or another government entity, initiate the process, which is the reverse of the 'normal' process, which typically involves a landowner applying to the municipality for an increase in rights.

b) Costs or Risks

- i) Proactive rezoning can have a negative impact on the poor. For example, Freemark (2019a in Denoon-Stevens and Nel, 2020) notes that the mechanism can result in increased property values but can lead to no significant change in the amount of units being built. Which means that the upzoning raised property prices without increasing supply.
- ii) In the Langa (elaborated on in the detailed analysis for Small and Micro Enterprise Zones in this report) example it was found that properties valued under R200 000 were exempt from property tax, however, the proactive upzoning led to properties being pushed above that threshold to where they would have to start paying tax. Some property owners could not afford this and would prefer not to have been subject to the upzoning.

- iii) Upzoning can lead to relaxing zoning regulations in already gentrifying areas which in turn allows for development of housing for the wealthy but will likely affect the poor negatively because the older more affordable housing stock are being replaced by new housing that only the high income groups can afford.
- iv) Increased development rights, mean owners can charge higher rental which the poor can't afford or the owners can take advantage of increased development rights by either redeveloping the property or selling the property to a developer.

c) Preconditions (When to use it)

- i) Inclusionary housing and proactive upzoning often occur in conjunction with each other, with proactive upzoning providing some relief to the 'burden' faced by developers in building inclusionary housing.
- ii) Benefits to the poor from proactive upzoning can be an increase in the number of low to semi-skilled job opportunities, given the increased amount of activity in the construction sector (in successful proactive upzoning initiatives), higher local government revenues due to the rise in property values, and a more vibrant urban environment.
- iii) Sufficient bulk infrastructure availability is crucial for the success of upzoning.
- iv) The public sector needs to be aware of what is happening in the market and also should have good communication with the private sector so that both parties understand what is desirable to the market and what is not.

d) Timing

Proactive upzoning should be used in instances where it is possible to address the main structural reasons for an identified problem.

The right market conditions should be in place for upzoning to be successfully implemented, if it is unfavourable market conditions, developers / private sector are often reluctant to invest and make use the upzoning mechanism, meaning the process to have implemented could have been a fruitless exercise.

e) Approval and Application process (where relevant)

(i) Approval

At its simplest, proactive rezoning is the process where a municipality, of its own accord, changes the existing zoning of land parcels in its jurisdiction. Unlike overlay zones, which change certain rights for properties within a specific area and are strategic, changing the zoning regulations for the whole city affects all properties in the municipality and is comprehensive. A good example of this in CCT was where the zoning regulations were changed to allow lower parking requirements in PT1 and PT2 areas with good access to public transport. The most comprehensive form of proactive rezoning is where the municipality amends the existing land use rights (including densities and floor areas) or reduces development restrictions, such as building restrictions

f) Advantages and Disadvantages

Advantages	Disadvantages
• Upzoning is a powerful tool for creating incremental reforms to zoning schemes and maps, which can assist in ensuring that zoning rules continue to reflect both the norms and broader societal vision for a better urban form. • Can implement comprehensive plan policies and strategies associated with future land use and the environment. • Relatively easy to maintain over time following initial adoption. • Allows for urban regeneration and increases housing supply, which improves affordability and mobility for homeowners and renters. • Proactive upzoning, done correctly, and bundled with other interventions, can increase housing production	• Risk of not increasing housing supply through enhanced rights but increase in land value. • Adds an additional layer of requirements to the development review process. • Requires a zoning amendment, which requires formal action by the CCT. • Increased pressure on aging infrastructure and resources (roads, sewerage, water etc.) • Environmental concerns of increased density on carbon footprints and threatening important green space in urban settings.

g) Lessons Learnt

City of Cape Town

The CCT was created in the 1990s as an amalgamation of many smaller municipalities, as well as a large portion of an area previously under a divisional council. This resulted in 28 different zoning schemes applying to different parts of the municipality. To simplify the situation, these zoning schemes were incorporated into one single scheme in 2012. Consequently, several areas within the CCT experienced an increase in rights. For example, in the old planning regulations the GR zone had a maximum height of 8m and two storeys on properties with an erf size of 900m² or less and height of 11m and three storeys with an erf size of 1800m² or more. The new zoning scheme however most of these properties were zone GR2, which has a height restriction of 15m, however, some of the additional restrictions were included, a floor area restriction of 1 applies to GR2 but in the previous regulations there was no limit on floor area. The CCT also initiated an amendment to SR1 zone to permit a second dwelling on all properties zoned SR1, this was completed in 2015.

Eveline Street - Namibia

This case study focused on the illegal use of residential properties for business purposes, in particular those that sold liquor. This project aimed to formalise business rights for properties along a high street area and to encourage the opening of new businesses in this corridor. Interestingly, it was never formally completed due to objections from new councillors. Despite this, because residents were told that the rights were going to change, and because the municipality responded to this area as if the formal rights had changed, this (in part) sparked investment and development of the area.

This is an example of the spontaneous evolution of businesses, where the physical layout and anticipation of business rights came together. This was reflected through growth both in the number of businesses and growth of existing businesses, and an increase in the number of businesses applying for and being awarded business licenses (Tonkin et al., 2018).

Langa High Street Project

Langa is a suburb situated approximately 13 km east of the Cape Town CBD and is considered to be a deprived area where lower income groups reside. The CCT initiated an overlay zone to promote urban revitalisation known as the Langa Quarter project. In this area, 207 properties were placed under an overlay zone that permitted an increased floor area, and the rights for restaurants, offices, boarding houses (guest houses), or service trades. This was done both as an attempt to regularise existing 'illegal businesses', and to stimulate new business growth in the area

h) Targeted Areas

- i) TOD precincts, activity streets, Bellville PTI where demand exists, land opportunity. Eg Bellville PTI and surrounds.
- ii) Areas where there is an opportunity for densification, areas zoned for SR1 but where opportunity exists for additional dwellings etc.
- iii) Areas earmarked for future densification and classified as development focus areas, in other words, areas in the City where investment and growth should be geared towards.

Environmental Exclusion Areas

Focus Area:

- New Development Areas (NDAs)
- Structuring corridors

Project Type:

- All types and forms of residential and non-residential development.

Goal:

- The purpose of this mechanism is to provide for appropriate environmental exclusion of National Environmental Management Act (NEMA) listed activities from the requirement to obtain an Environmental Authorisation in New Development Areas (NDAs) identified by the Land Use Model and Revised District Spatial Development Framework.

a) How it works:

Applicant / Developer

The exclusion process for the applicant/developer works as follow: An applicant / developer identifies / takes interest in a site that has been identified through the Land Use Model (LUM) as a New Development Area. The LUM indicates what type of development (residential, non - residential etc.) is appropriate / desired on this specific site. If the site has been identified and accepted (by the authorities) as one where exclusion of specific NEMA listed activities from requiring environmental authorisation is possible, then the developer may:

- a) Check if his/her proposed project will trigger any listed activities in any of the Specific Environmental Management Acts (particularly the National Environment Management (NEM) Water Act, the NEM Waste Act, the Coastal Management Act and the NEM Air Quality Act) that will trigger the requirement for an environmental authorisation. If there are listed activities in these Acts requiring authorisation, the developer will need to proceed through the normal environmental authorisation applications (Basic Assessment or full Scoping Environmental Impact Assessment (EIA).
- b) If the only triggered activities are those listed in the NEMA Environmental Impact Assessment Regulations (2014, as amended) – and the site or area is identified as a geographic area where exclusions are possible in terms of the provisions of Section 24 (2) of NEMA, then the developer will not need to get authorisation for those specific NEMA listed activities. The developer will however have to abide by and implement the conditions set out in the standard or tool (usually in the form of an Environmental Management Programme Report (EMPr)¹² that has been developed for the exclusion area.

¹² Definition of EMPr: An Environmental Management Programme (EMPr) can be defined as “an environmental management tool used to ensure that undue or reasonably avoidable adverse impacts of the construction, operation and

These conditions include specific impact prevention and mitigation actions for that specific geographic area where exclusions for specific NEMA listed activities have been enabled.

- c) The developer will need to apply for registration of the exclusion and notify key interested & affected parties of the registration decision to enable them to appeal the registration decision.

b) Costs or Risks

- i) The Developer / applicant will carry no cost / risk since the activity that they previously had to apply for to get EA has been excluded. The cost / risk will be less since the exclusion process provides certainty about what is envisioned for a specific site and the developer will not have to spend time / resources to obtain EA for the listed activity.
- ii) The only real cost the CCT will carry is the time / resources that will be spent on obtaining approval for the specific exclusion areas and administering the relevant areas within the management and control of the CCT, to ensure that the guidelines as contained in the EMPr are adhered to.
- iii) It is emphasised that these exclusions are applicable only to NEMA listed activities, and that should any activities trigger authorisation requirements due to being listed in any of the Specific Environmental Management Acts (Water, Waste, Air, Coast), then the relevant environmental authorisation application process (Basic Assessment or Full Scoping/EIA) would have to be followed.
- iv) Developers will also have to fulfil the requirements of any other applicable legislation, including those of the National Heritage Resources Act and any land use application processes.

c) Preconditions (When to use it)

- i) Exclusions can typically be provided for sites that have been degraded and transformed and where the listed activities that typically will be triggered are not of relevance anymore.
- ii) When the site is not deemed to be of environmental importance any more due to it being disturbed / transformed and not restorable.
- iii) Sites that are isolated from the wider Green Infrastructure network and that form part of the current urban fabric.
- iv) Where an urgent need is required for a specific type of development, be it residential or non-residential, and where the proposed activity will not have a detrimental impact on the environment.

decommissioning of a project are prevented; and that the positive benefits of the projects are enhanced" in all phases of the project's life cycle.

d) Approval and Application process to obtain exclusions (where relevant)

Process to obtain Environmental Exclusions for identified sites:

1. The first step is to identify the specific geographical areas where listed activities will be excluded. The focus areas for exclusions will be based on the outcomes of the Land Use Model and areas which have been earmarked as NDAs, Development Focus Areas and Urban Support Areas. The Spatial Planning and Environment Directorate will go through a process of identifying potential geographic areas where exclusions may be possible. The reasons for/motivation behind these potential exclusion areas will be documented and the sites will be mapped.
2. The next step is to clearly identify the NEMA listed activities that will be excluded in each of the identified exclusion areas. In addition, the relevant environmental impact prevention and mitigation actions necessary for these exemption areas will be developed and documented in an EMPr. The EMPr instrument specifies what conditions should be in place and what requirements should be adhered to in order for the exclusions to be granted to the specific site / area.
3. Once the applicable sites have been identified and the EMPr has been developed, these areas and the EMPr will need to be gazetted for public comment, by the the Minister or Member of Executive Council (with concurrence of the Minister).
4. Prior to the gazetting of the draft EMPr, it will be included in the SDF/EMF to inform the public of the intention to develop and adopt an exclusion instrument. After the public participation process, revisions may need to be made to the proposed exclusion areas, depending on the comments received. These revisions can be made at the same time that revisions are being made to the SDF/EMF after the first public comment.
5. The SDF/EMF, with the identified exclusion areas and activities will then be finalised. The SDF/EMF will then be made available to the competent authority (DEA&DP) for adoption as an Environmental Management Instrument.
6. Once the SDF/EMFs are adopted and the EMPr is gazetted and approved, developers may apply to formally register their project if they fall within the identified exclusion areas; the registration process is relatively quick, but the developer does need to notify interested and affected parties of the registration decision, as it is appealable.

e) Timing

- i. The process to identify environmental exclusion areas and activities needs to be completed by the start of the District SDF public participation process (2021). The proposed EMPr for these exclusion areas should also be drafted and subjected to the public comment process.

f) Advantages and Disadvantages

Advantages	Disadvantages
• Does not require utilizing any capital resources or debt to implement. • Results in exclusion from NEMA listed activities in specific geographic areas for the next 10 years. • NDA environmental exclusions will unlock development potential. • Encourages development where environmental features are of little value / disturbed and cannot be repaired / rehabilitated to return to natural state. • Advantages to applicant include: • Less time/ resources / application fees; • One less application be applied for in order to obtain EA; • Shorter timeframes to get feedback; and • Less red tape / approval processes.	• Exclusion approval may take a long time to get approved, particularly if the SDF/EMF has to be adopted as an Environmental Management Instrument by DEA&DP (i.e. competent authority) before the exclusion areas and activities can be registered. • The first SDF/EMF public comment period will identify the proposed exclusion areas and activities, but the actual process of getting these accepted and registered will be a second and ongoing phase. It is not known how long the registration process will take. • The developer will need to notify the public that a registration process is underway and provide them with opportunity to appeal the registration decision. An appeal process normally requires a 30 day delay before the proponent can start with the listed activities (i.e. to see if there are any appeals). • Still have to establish an agreed upon methodology of how the process will be managed. There are still some questions as to the public involvement and registration processes. • The Registration Application may get refused although this is unlikely if the SDF/EMF is adopted as an Environmental Management Instrument and enough supporting information is provided. • Sites with other sensitive environmental features such as waterbodies etc. still have to go through full authorisation process.

g) Case Study:

Gauteng Environmental Management Framework:

The framework identified specific exclusion zones, developers can then apply to undertake listed activities in the exclusion zone. The necessary description of the project must be given. In addition, the application has to be advertised and there is opportunity for the public to appeal the registration. If no appeal (or appeal is resolved in favour of developer), the project is then registered and the developer can commence with the listed activities. Notification of commencement must be given ahead of time. The registration validity has a time limit, in this case, 10 years. If the developer has not commenced with all the listed activities in this time, he/she must reapply for registration.

h) Example of where it can be applied:

Where the NDAs (sites within Development Focus Areas and within Structuring Corridors) and sites with environmental features overlap, but where the environmental features are not considered to be significant or where portions of the site can be developed through appropriate design and that would not have a detrimental effect on the environment.

Heritage Exemption Areas

Focus Area:

- Development Focus Areas (DFAs)
- Areas where the overall heritage value of the built environment is low
- Areas considered to have high growth potential and that are targeted over the medium to long term as new development areas.

Project Type:

- All forms of residential and non-residential development permitted.
- Depending on the end goal, but usually applicable to areas where the Municipality would want to incentivize development / densification and where anticipated impact on heritage significance is low
- Development corridors

Goal:

- Facilitate and encourage development where densification is appropriate and desirable
- To streamline the administrative process predevelopment.

a) How it works:

The NHRA makes provision for the exemptions of the requirements of S34 and S38 in geographical areas where heritage resources within that area 'are adequately provided for' in terms of the formal protections of the NHRA.

The exemption method can be more appropriately applied in the Development Focus Areas outside the HPOZ and proposed HPOZ and particularly along the development corridors (e.g. Voortrekker corridor): areas where the overall heritage value is low and the future growth potential is high.

Following a heritage audit of the area under investigation for exemption, the City can proactively apply to Heritage Western Cape for exemption. The main purpose of the heritage exemption is to encourage development and densification where it is desirable through the reduction in time and costs of administrative processes, as the development application will only require city approval. It further provides certainty by confirming the absence of conservation worthy heritage resources in the area and no application to HWC is required.

b) Qualifying criteria

A heritage audit of the geographical area to be exempt must be completed and conservation worthy heritage resources within that geographical area must be formally protected in terms of the NHRA.

c) Costs or Risks

- i) There will be a reduction in the costs associated with specialist heritage studies as the developer/applicant will not be required to make application to Heritage Western Cape in terms of S34 and/or S38
- ii) The City of Cape Town may need to invest additional time and resources to apply for the relevant exemptions.
- iii) Some risk associated with uncertainty regarding timeframes in which HWC may process the exemption application

d) Preconditions (When to use it)

- i) In areas where the built environment is older than 60 years but not considered to be have high conservation potential
- ii) Where an urgent need is required for a specific type of development, be it residential or non-residential, and where the proposed activity will not have a detrimental impact on heritage resources.

e) Timing

- i. The application for heritage exemptions is a medium to long term process
- ii. The concept of application for heritage exemption can be included in the SDF review process

f) Application and approval process (where relevant)

Application for exemption is made in terms of S34(3) and S38(9) of the NHRA by the local authority to Heritage Western Cape.

Section 34 (NHRA, pg. 58):

(1) No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.

(3) The provincial heritage resources authority may at its discretion, by notice in the Provincial Gazette, make an exemption from the requirements of subsection (1) within a defined geographical area, or for certain defined categories of site within a defined geographical area, provided that it is satisfied that heritage resources falling into the defined area or category have been identified and are adequately provided for in terms of the provisions of Part 1 of this Chapter.

Section 38 (NHRA, pg. 66):

(1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as—

- a) the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;*
- b) the construction of a bridge or similar structure exceeding 50 m in length;*
- c) any development or other activity which will change the character of a site—*
 - i. exceeding 5 000 m² in extent; or*
 - ii. involving three or more existing erven or subdivisions thereof; or*
 - iii. involving three or more erven or divisions thereof which have been consolidated within the past five years; or*
 - iv. the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;*
- d) the re-zoning of a site exceeding 10 000 m² in extent; or*
- e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.*

(9) The provincial heritage resources authority, with the approval of the MEC, may, by notice in the Provincial Gazette, exempt from the requirements of this section any place specified in the notice.

Approval of heritage exemption

1. Heritage audit of geographical areas identified as suitable for exemption.
2. Submission of the heritage audit results of the specified geographical area to HWC IGIC (Inventory Grading Interpretation Committee).
3. Once HWC IGIC has indicated support for the application, and satisfied that conservation worthy heritage resources within the geographical area has been adequately protected in terms of the formal protections of the NHRA, the proposal must go through a public participation process.
4. Following the outcome of the public participation, HWC council can approve S34 exemption by means of a notice in the Provincial Gazette.
5. In the case of S38 exemptions, HWC must place a notice in the Provincial Gazette, after the approval of the exemption by the MEC Arts & Culture.

g) Advantages and Disadvantages

Advantages	Disadvantages
• Does not require utilizing any capital resources or debt to implement • Encourages development where it is desirable in terms of little or no negative impact on heritage • Advantages to applicant include: • Less time/ resources / application fees; • 'One stop shop' for development application • Reduced timeframes • Certainty for developers	The application process to HWC is very time consuming

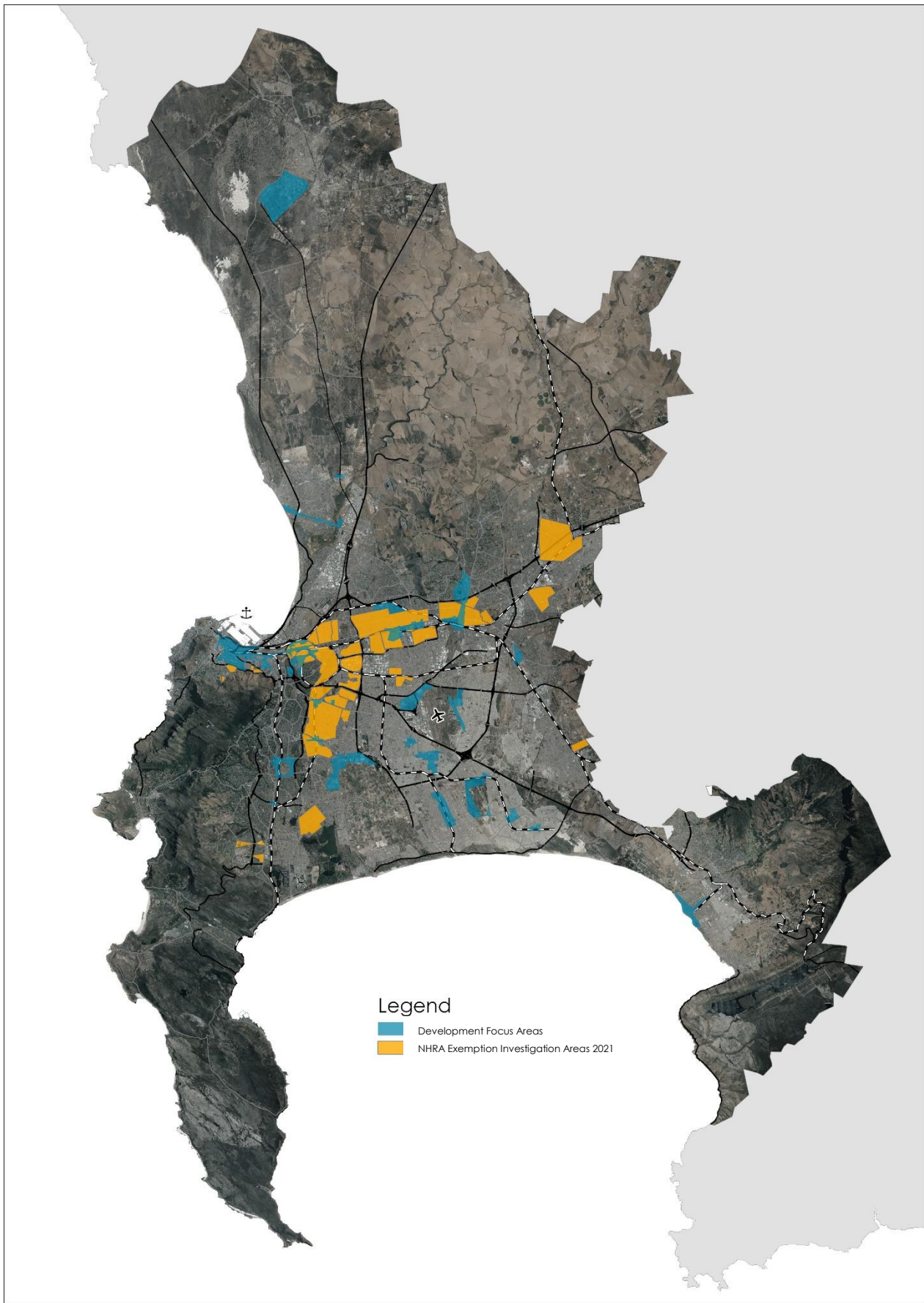
h) Case Study: Parow

Motivation

- Supports MSDF investment rationale → suite of incentives to encourage density and diversity around public transport.
- Promotes greater certainty for future development while conserving heritage-worthy sites.
- Built stock (older than 60 years triggering s34 of the NHRA) not of particular heritage value or significance.
- Encourage development in areas of little or no heritage significance by reducing administrative 'red tape'.
- Does not give or take away existing development rights nor does it suggest that development is imminent.

i) Example of where it can be applied:

- i) Development Focus Areas where there is coincidence with areas identified for investigation for heritage exemption



Tax Abatements

Focus Area:

- Areas where development is encouraged but the property market demand is weak.

Project Type:

- Residential, commercial and/or industrial development, depending on the type of economic development the municipality would like to encourage.

Goal:

- Stimulate private market-rate or below-market development (such as affordable housing).

a) How it works:

- i) A reduction or exemption from taxes granted by government for a specific period, usually to encourage investment in locations with lower demand (eg. UDZ in SA)
- ii) Benefits of the tax abatement get passed onto subsequent owners who purchase the property, thereby incentivising end users to relocate to an area that they may not otherwise locate in
- iii) Can be set up in designated neighbourhoods where the city is trying to incentivise development or on project-by-project basis if that project advances certain policy goals e.g. job creation.
- iv) Property tax pinning (whereby property tax is frozen or pinned down for a fixed period of time), differentiated property tax rates and remissions of rates could all be used to draw developers/home buyers into priority areas (Meyer and Oranje 2001).

b) Costs or Risks

- Direct negative fiscal impact in exchange for long-term economic & social benefit
- Requires administrative capacity
- While incentives can play role in encouraging investment that is critical for driving economic growth, the City must be cognisant of the revenue implications of these programmes and how it impacts administration's capacity to address its other strategic policy priorities.
- Tariff impact modelling exercise required.
- Poorly targeted incentive may result in significant loss of income for City.

c) Preconditions (When to use it)

- In a distressed market where residents & businesses have not been willing to make improvements to their property or to invest in the area
- In a stabilised market to incentivise the development for social good (eg. affordable housing)

d) Advantages and Disadvantages

Advantages	Disadvantages
• Help mitigate financial risk to developers by helping to close the gap in a market where the cost of construction exceeds anticipated sale price. • For residential developments, tax abatements can incentivise a homebuyer to purchase a home at a higher price knowing that the property taxes will be reduced or waived for a set period of time. • May attract economic activities which corresponding with high rate burdens, especially land extensive and electricity/water intensive activities. • May improve the chances of survival amongst existing small and medium enterprises. • Secondary economic and social benefits such as job creation, improving safety by eliminating blight conditions, and increasing adjacent property value.	• If the neighbourhood doesn't improve, property value could remain flat or even decline. • While striving to induce investment, tax abatements present a risk of becoming unnecessary giveaways or incentivising unsustainable development. For example, a receiving firm may be or become dependent on the incentive for profit or viability and may require a renewed abatement otherwise it may leave the community, risking a termination of the some or all beneficial gains. • Can cause significant loss of income to City. • May counter-act demand management imperative. Risk of incentivising unsustainable economic practices, such as land extensive activities or activities which consume very large quantities of water, electricity and generates significant waste.

12.8.2.2. Income Generation Mechanisms

Land Readjustment Scheme

Focus Area:

- Transit-Oriented Development
- In urban fringe areas along future railway lines

Project Type:

- Neighbourhood redevelopment to make way for new infrastructure

Goal:

- Acquire land to build public infrastructure using minimal municipal funds
- If there is surplus land as a result of a land readjustment, the municipality can sell the surplus land and use the proceeds to help defray costs of building the new infrastructure

a) How it works:

- i) Landowners pool their land together for reconfiguration and contribute a portion of their land for sale to raise funds to partially fund public infrastructure costs. This can be facilitated by local government through the development of a new land use plan for a particular precinct or local area, which will include new infrastructure provision, which increases the value of each surrounding plot. As this will like increase the value of properties, due to better planning and infrastructure provision, private landowners are willing to give up some of their land to fun said infrastructure.
- ii) Can be undertaken by either public or private entity
- iii) The municipality can designate special land readjustment areas along future public transport infrastructure, and provide services to facilitate landowners consolidate their land.

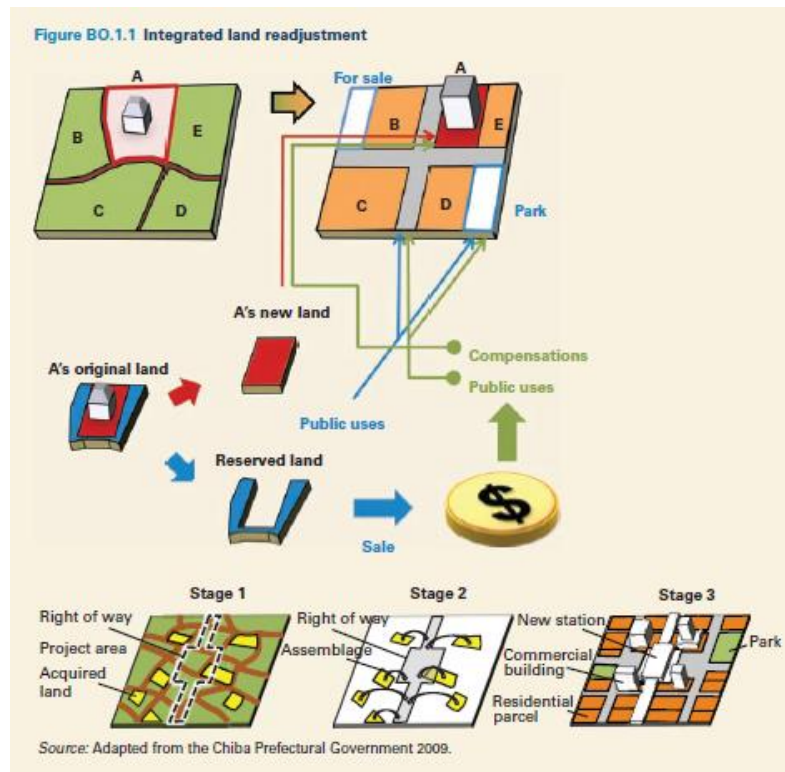


Figure 27: Land Readjustment Scheme (Worldbank, 2015)

b) Costs or Risks

- Compensation for taking land is in the form of another piece of serviced land of equal value, therefore no initial capital outlay for land acquisition by the local authority
- May require compensation to property owners not willing to participate

c) Preconditions (When to use it)

- For new infrastructure projects that require land assemblage
- In a market where the construction of improvements is expected to result in a significant increase in the value of surrounding property
- Willing property owners

d) Approval and Application process (where relevant)

There is no City policy that makes provision for such a mechanism. However, in theory, a typical process is described below:

- Initiation (usually by petition from a majority of property-owners in a particular area to the local authority). Dissenting landowners may be forced to contribute their land to the project through some form of regroupment by order.
- Declaration of the boundary limits of the scheme, normally by a public agency under enabling legislation, or by a private association of landowners. An association of land-owners can be formed, with rules of association, directors and meeting procedures.

- Preparation of a redevelopment scheme by the municipality or related entity determining future uses and re-planning the road and plot layout. This can identify buildings for demolition or reconstruction, street closures, proposed public areas, as well as the land allocated for private development.
- Measurement of plot areas before and after readjustment.
- Costing. This will value the market price of all saleable plots, and estimated development costs of infrastructure.
- Reallocation of plots back to landowners, with secondary rights (tenant, mortgagors) protected. Typically, half of the original land area will be retained for roads and public spaces, and for cost equalisation, leaving half to be reallocated, usually located as nearly as possible to the originally position. Need for guarantee that land values will not decrease, and no risk to land-owner. Land owners should be given the right to leave the project, with value recovery guaranteed by the municipality. Landowners will be allocated plots that are 60% of the area of the land that they originally contributed to the project in plots. Owners may opt for payment rather than land. However, the land received back will be fully serviced and ready for sale as urban lots.
- Implementation. The "reserve" or "cost-equivalent" land is sold by the agency as the project proceeds, and the proceeds from their sales should cover the infrastructure costs. The sale of these plots is generally by advertisement and public auction. If serviced development land is worth 400% of the value of un-serviced land, the 60% of plot area returned to landowners will still be worth 240% more than the plot originally contributed (exempt from land transfer tax).

[Robert, 2007]

e) Advantages and Disadvantages

Advantages	Disadvantages
• Requires minimal public funds to acquire land compulsory for public purposes. • In a carefully planned land readjustment project, local infrastructure investments could, in theory, be self-financing. • Land readjustments promote transit oriented development and potentially increased density and mix of uses to create sustainable development.	• The negotiation process between the agency and property owners on land allocation issues can be lengthy and contentious. • Property owners must be convinced of the benefits of giving up their land in exchange for a smaller parcel with a higher value. • To construct public improvements, municipal capital resources or debt would be required upfront. • Revenue from the sale of excess property would not cover any

• The addition of public infrastructure increases property value and increases property tax revenue. • Unlike using eminent domain, this tool allows original owners to partake in land redevelopment, thus enabling them to enjoy the financial gains generated by the project.	operating deficits for the infrastructure improvements. • Not applicable in built-up areas where land is scarce to make way for new infrastructure.
--	--

f) Targeted Areas

Future TAPs (Transit Accessible Precincts): areas within a 500 metre walking planned rail, BRT stations and certain higher order stops– see Figure 28 below.



Figure 28: TAPs

References:

Home, Robert. (2007). Land readjustment as a method of development land assembly: A comparative overview. *Town Planning Review*. 78. 459-483. 10.3828/tpr.78.4.4.

Suzuki, Hiroaki; Murakami, Jin; Hong, Yu-Hung; Tamayose, Beth. 2015. Financing Transit-Oriented Development with Land Values: Adapting Land Value Capture in Developing Countries. *Urban Development*. Washington, DC: World Bank. © World Bank. <https://openknowledge.worldbank.org/handle/10986/21286> License: CC BY 3.0 IGO.

Urban Redevelopment Scheme

Focus Area:

- Transit Oriented Development
- Around an existing rail or BRT station or a new station that is planned to be built

Project Type:

- Multiple private owners consolidate parcels into a single high-density building

Goal:

- Dense urban regeneration
- If there is surplus floor area left after property rights of original landholders and building owners are moved to the new building, the municipality can sell the development rights and the proceeds to pay for infrastructure improvements.

a) How it works:

- i) Involves landowners and developer joining together to form one cooperative entity that consolidates multiple land parcels into a single site for redevelopment. As part of this process government assembles the individual private properties and undertakes a new higher development plan and delivers the necessary infrastructure.
- ii) Government proactively rezoned the composite site from residential to mixed-use, and plans denser development using the assembled land parcels.
- iii) At the end, the government returns to each landowner a share of the overall new development that is equivalent to their original land or property ownership. It retains a share of the development that it then sells to recover the cost of the infrastructure improvement.

Figure 4.2 Inclusive urban redevelopment scheme, Japan (hypothetical)

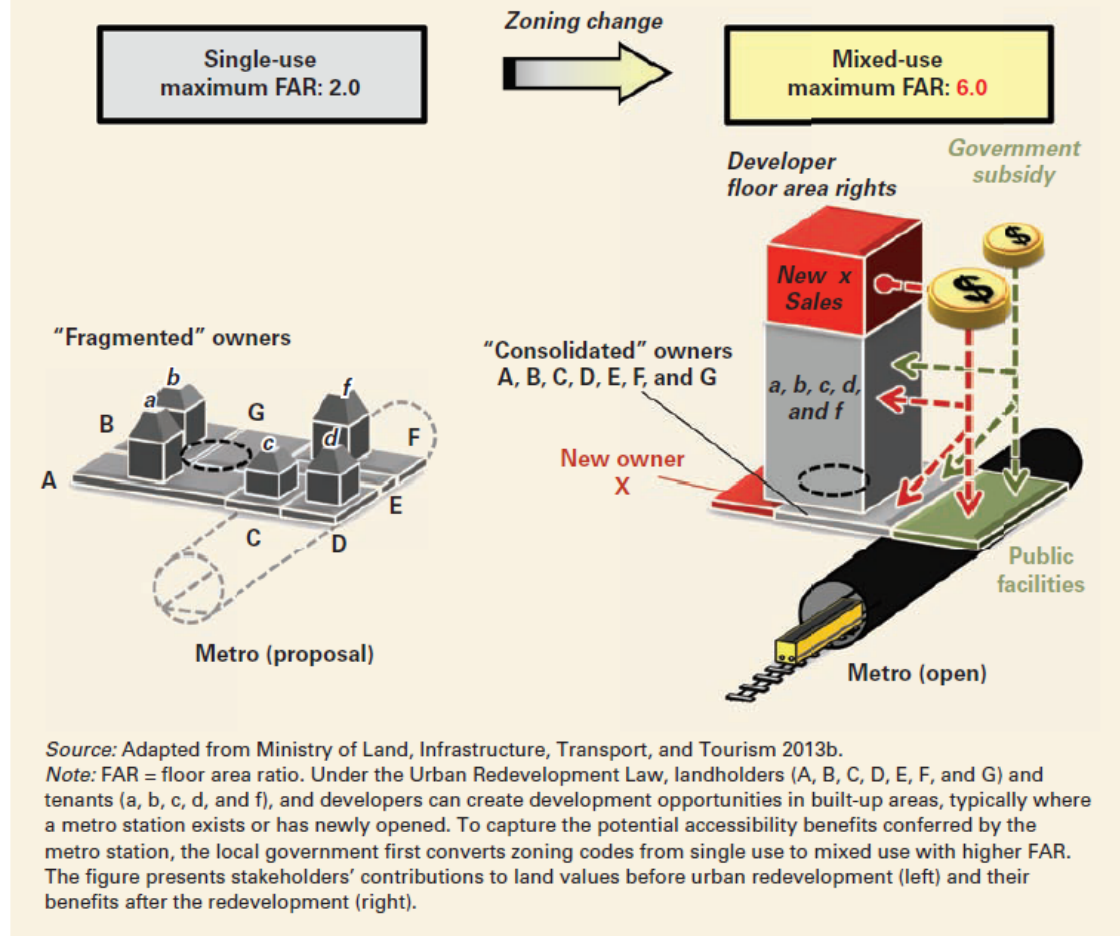


Figure 29: Urban Redevelopment Scheme (Worldbank, 2015)

b) Costs or Risks

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

c) Preconditions (When to use it)

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

d) Approval and Application process (where relevant)

- i) Approval

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

- ii) Application Process

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

e) Advantages and Disadvantages

Advantages	Disadvantages
• Promotes dense, transit-oriented development. • Potentially results in surplus floor area that a municipality can sell the development rights and use the proceeds to substantially cover the costs of land assembly, new buildings, and public facilities within the district. • Results in increased property taxes as a result of improved properties. • Promotes economic development by creating high-density buildings and potentially a mix of uses. This can lead to additional tax revenue, the creation of jobs and housing, and increase ridership of public transport. • Transit oriented developments help reduce the reliance on automobiles as the primary mode of transportation while promoting a more efficient land use and public infrastructure.	• Likely requires the provision of new public infrastructure (e.g. Wider roads, a station plaza, and other amenities to support dense, mixed use urban development). Public resources would be necessary to finance and build the infrastructure. • Not applicable where is no transit station built or planned, and dense development is not in demand (i.e. developable land is abundant so there is no need to consolidate small parcels).

f) Targeted Areas

TAPs (Transit Accessible Precincts): areas within a 500 metre walking distance of current and planned rail, BRT stations and certain higher order stops.

12.8.2.3. Institutional Mechanisms

Land Release and Acquisition Strategy

Focus Area:

- Metro-wide land parcels
- City-owned land
- Urban centres and land with TOD Potential

Project Type:

- For private or city-owned property being transferred for private development
- Private-owned land parcels being transferred to the City
- Inter-governmental land transfers

Goal:

- Strategically plan for the City's developmental needs by creating a consolidated inventory of future City land acquisitions and alienations.
- Align the land requirements of City line departments to existing inventory of City-owned land.
- Ensure the sustainable use of land resources to meet expected future population demands.
- Leverage strategically well-located land to attract private sector investment.

a) How it works:

- i) The Property Management Department is currently in the process of drafting a Land Release and Acquisitions Strategy which will lay out the City's strategic process for deciding up on which land parcels should be acquired or alienated.
- ii) The forthcoming strategy will not change the processes by which acquisitions/releases take place in accordance with the Municipal Asset Transfer Regulations Policy. As such, the land disposition and land acquisition mechanisms, outlined in this suite of mechanisms will apply as per normal.
- iii) The strategy should seek to ensure that the needs of line departments can be catered for by land that is currently held by the City or that a strategic approach to identifying land for acquisition is utilised to secure the most appropriate land for the line-department requirements or developmental need.
- iv) The identification of land to be earmarked for use within the strategy should be an informed, data-driven process, as such a number of tools have been put forward in the form the Land Identification Protocol (currently being drafted) to be used by Property Management (Figure 30).
- v) The Land Release and Acquisition Strategy should benefit from the inclusion of a database of strategic land which will be developed using SP&E policy

- and investment frameworks, a spatial filtering tool and a database of Undeveloped and Partially Developed Land Inventory (red box in Figure 30).
- vi) Ideally, land parcels that are subject to being entered in this Strategy go through the requisite stages of the CCT Land Pipelining Process (Figure 31) as a means of ensuring that the appropriate checks are made with regard to their identification and the suitability of the land (i.e. due diligence).

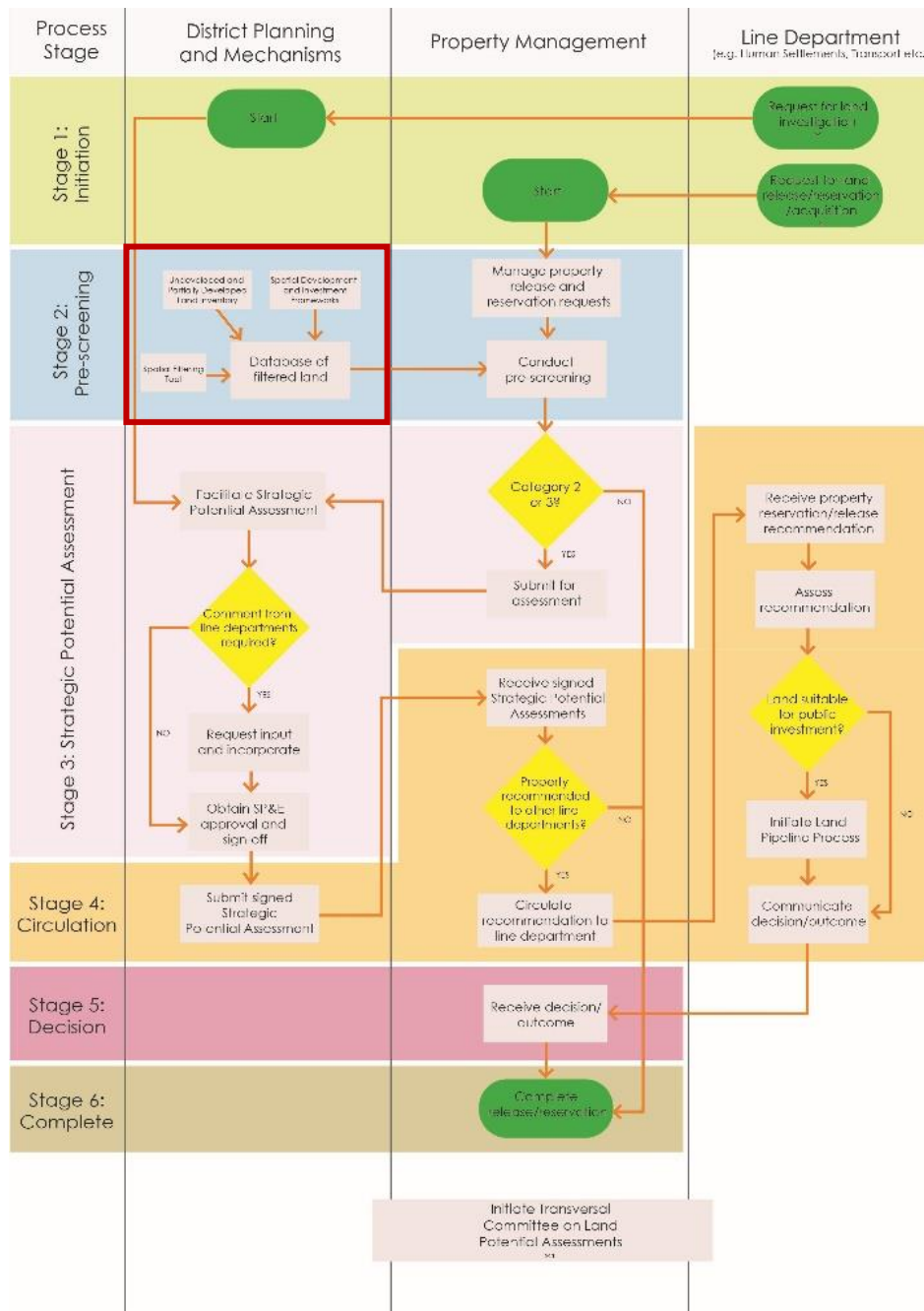


Figure 30: Land Identification Protocol Process Diagram

CITY OF CAPE TOWN LAND PIPELINE FOR PUBLIC INVESTMENT

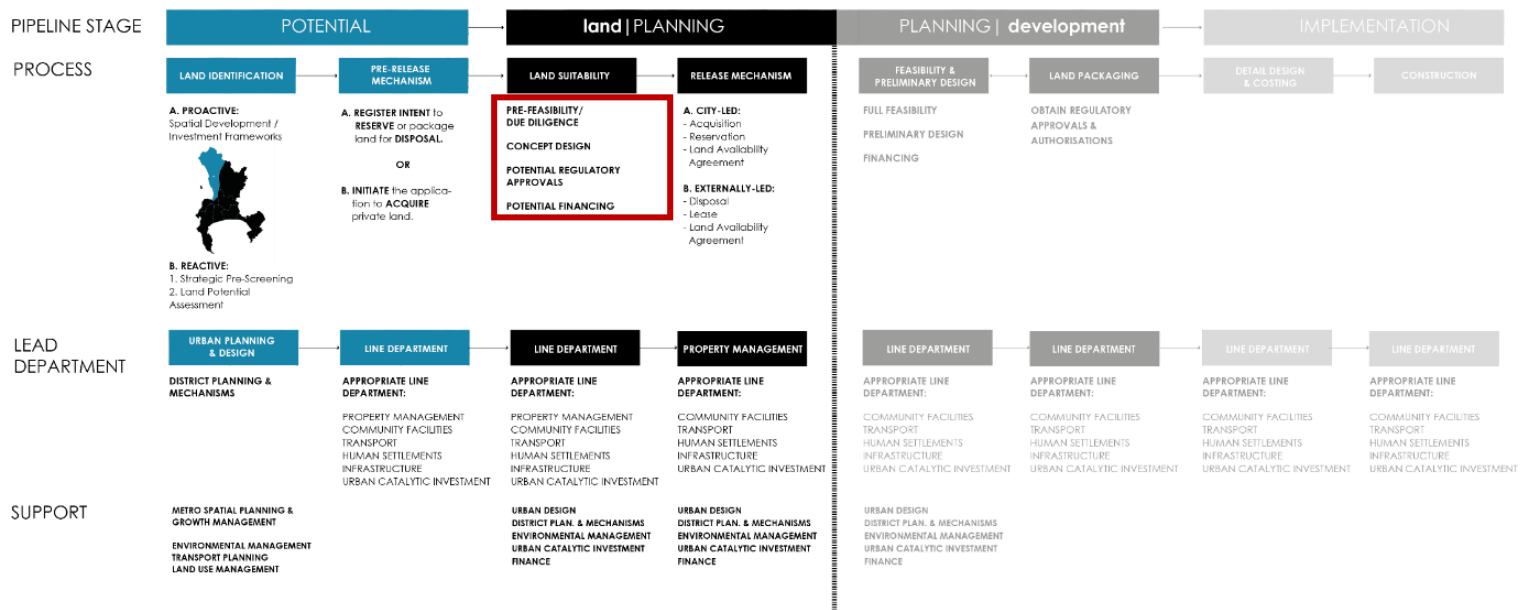


Figure 31: CoCT land pipeline for public investment

b) Costs or Risks

- Administrative costs to the municipality.
- If land is released without the proper checks in place to ensure that it is non-strategic, this could be a wasted opportunity cost to the City to use it for developmental purposes.
- Holding and safeguarding costs of land may be incurred in the event that the strategy does not align with Capex budget for other developmental departments.

c) Preconditions (When to use it)

- Land which is tabled in the Strategy for acquisition should ideally be considered to have the potential for strategic development. This would mean that the land parcels have elements of social opportunities, natural infrastructure, economic opportunities, housing, and transport and urban infrastructure to contribute to the facilitation of the City's spatial planning policy, TOD objectives and building integrated communities
- Land that does not fall within these parameters should be considered for alienation by the City.
- The leasing of land should also be considered for those parcels which are deemed strategic but do not fall within investment frameworks of City line departments.

d) Timing

- i) Will be continuously running once it is finalised. The strategy will present a framework for 3/5 year periods of land acquisitions and releases by the City.

e) Approval and Application process (where relevant)

i) Approval

The Land Acquisitions and Disposals Strategy is currently being drafted by the Property Management Department. It is expected that this will be completed and passed through PCC by the time that the District Plans are approved or shortly afterwards.

ii) Application

Application follows standard MATR processes which will be administered and approved by the Property Management Department with input from Spatial Planning as well as other relevant line departments.

f) Advantages and Disadvantages

Advantages	Disadvantages
• Does not require utilizing any capital resources or debt to implement • Can be used to achieve developmental vision of the City. • Presents a clear strategy framework for the City's approach to utilising land which may entice developers to invest in certain areas.	• May lead to the release/acquisition of land which is not entirely suitable to the developmental aims of the City.

g) Case Study: Lessons Learnt



*The Rondebosch Golf Club occupies about 45 full-size soccer fields, which activists said could be used to build 2 500 new homes.
Picture: African News Agency (ANA)*

Build homes at Mowbray golf club, City told as land occupations spike

By Francesca Villette  Aug 19, 2020



Cape Town – With more prime City-owned land up for lease renewal to a golf club, housing activists have said the Mowbray site should be considered for affordable housing, the need for which has been exacerbated by the Covid-19 pandemic.

The City was considering an application to renew the King David Mowbray Golf Club's lease for another 10 years, with a rental of R11 500 a year, or R950 per month, according to advocacy group Ndifuna Ukwazi (NU).

NEWSFLASH

Landmark Tafelberg ruling: Western Cape High Court strikes a blow against apartheid spatial planning

By Suné Payne • 31 August 2020



Protests over the sale of land in Cape Town's CBD and legal action resulted in a win for affordable housing on Monday, 31 August 2020 wh...

Subscribe 155k

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



Listen to this article
5:34

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



Suné Payne

Follow Save More

DISPLAY ADVERTS

ON OFF

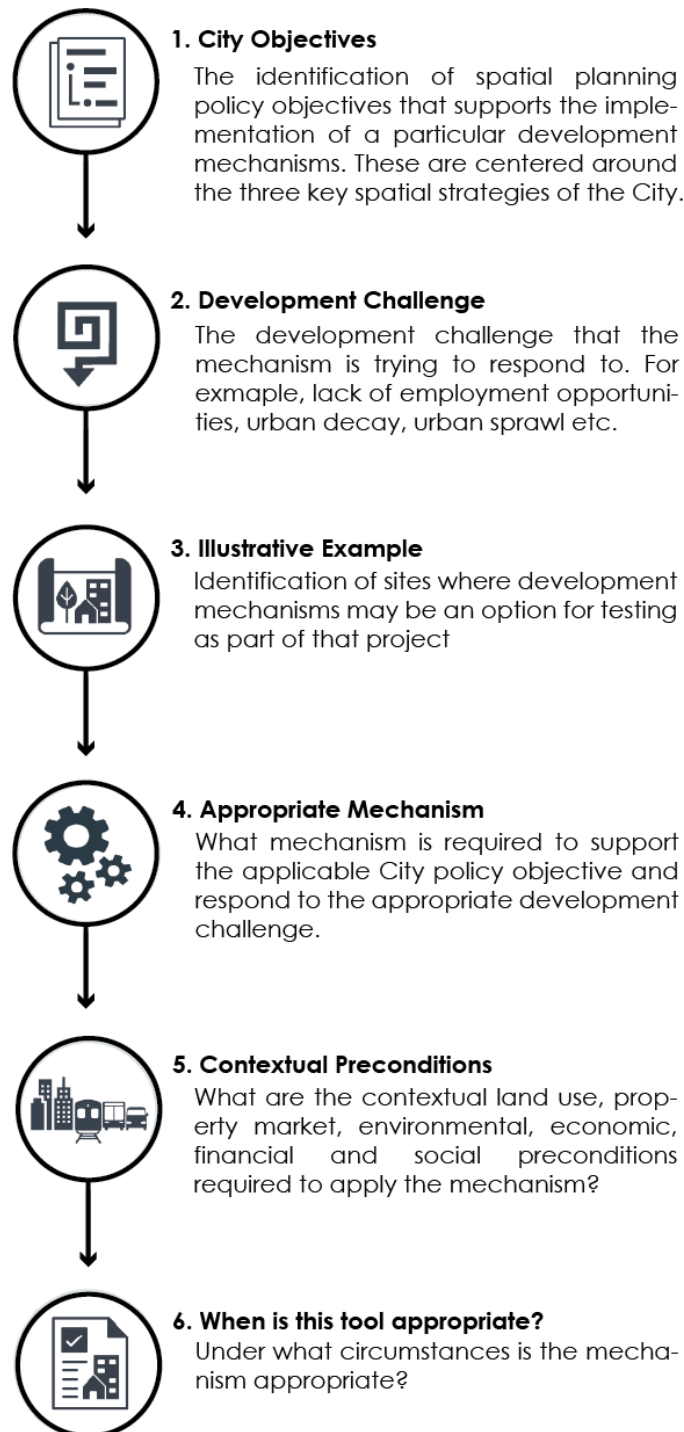
Porsche Approved

h) Example of where it can be applied:

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

12.9. Spatial targeting and Application Framework

The following diagram describes the process and method to apply future mechanisms and extend current mechanisms to spatially targeted areas in the district. This is informed by key opportunities and constraints identified through the DSDF baseline analysis and the detailed analysis of each mechanism located in Annexure 12.



12.9.1 Spatial Targeting – ECAMP

The City is currently in the process of reviewing ECAMP (Economic Areas Management programme). Using ECAMP, local interventions will be identified which will help ensure that each business precinct performs optimally given its particular locational assets. The **development performance** indicator reflects the current level of market confidence in an area by measuring short-term price signals (i.e. sales, building work, rentals and rental growth, vacancies, etc.). **Location potential** indicator measures the extent to which the precinct is aligned to the medium- to long-term location requirements of the city's business sectors (i.e. agglomeration, land supply, crime and grime, proximity and infrastructure). ECAMP will be extended to all areas in the city (not only business precincts). Once complete, it will be used to supplement and verify that the correct contextual preconditions exist and that the circumstances allow for the use of the tool, and to provide the evidence base for pursuing the implementation mechanisms described in this report.

12.9.2 Application Framework

The following table provides a framework to identify an appropriate mechanism to enable its spatial vision and address a particular development challenge in a targeted area. This should be applied to all 8 district and associated sub-districts to identify a suite of mechanisms to support the implementation of the DSDF. The table below should be applied together with Annexure B in order to take cognisance of the costs and risk associated with each mechanism prior to their selection.

Table 18 Local Application Framework

City Objectives	Development Challenge	Illustrative Example	Potentially Appropriate Mechanism	Contextual Preconditions	When is this tool appropriate?	*	**	***
EXISTING MECHANISMS								
Support appropriate city growth; support economic growth	Market demand exists but is constrained by infrastructure availability - Bulk Infrastructure: Capital outlay is too large for the municipality or a single developer to finance upfront - Bulk infrastructure: Required infrastructure to respond to demand is not a short-term budgetary priority for the City - Connecting infrastructure	- Bellville – Tygervalley (e.g. IRT link as part of IPTN / Transport Infrastructure) - Other business nodes where strong demand (e.g. CBD property)	Development charges (i.e. impact fees)	Applicable in cities where there is a strong demand for private development	- For private development which requires new infrastructure or services - In cities where there is a strong demand for private development - Requires dedicated municipal staff to administer effectively	✓		
	Areas with clear potential for economic growth but which is currently underperforming or lagging.	- Atlantis Industria - Triangle Farm - Parow Industria - Sacks Circle - Landsdowne Industrial (known as Philippi North in ECAMP) - Elsies River	Development Application Fee Waiver	- The investment must constitute a new 'external' investment or the expansion of an existing investment in the area, and cannot simply be a relocation of businesses already based within the municipal boundaries of Cape Town. - The investment must be in a sector which enhances the value-added production capacity of Cape Town. More specifically, the proposed investment should be located in the manufacturing and specific tertiary sectors.	- This will be determined by the market potential and performance scores as revealed in the City's Economic Areas Management Programme (ECAMP). Areas with clear potential for economic growth but which is currently underperforming or lagging. - Limited to manufacturing and tertiary sectors. - The areas where the manufacturing sector incentives currently apply are: - Atlantis Industria - Triangle Farm - Parow Industria - Sacks Circle - Landsdowne Industrial (known as Philippi North in ECAMP) - Elsies River - The following sectors will be eligible for the investment incentives: - Broad Manufacturing Sector - Priority Manufacturing Sectors: - Agro-processing - Green technology - Electronics and electrical engineering - Clothing and textiles - Priority tertiary sector include: - Business Process Outsourcing (BPO), - Information and Communication Technology (ICT), - Tourism, - Film Industry.			✓
			Discounted Development Contribution					✓
			Electricity Tariff					✓
			Fast-tracking of Applications					✓
Encourage integrated settlement patterns; Encourage a more compact form of development;	Market demand exists in an area but is constrained by a variety of potential factors.	- Bellville Opportunity Area - Philippi Opportunity Area - Foreshore Precinct - Paardevelei and Athlone Power Station sites - TOD Station Nodes	Catalytic Land Development Pipeline	- Sites or projects that are strategically important the City – have the potential to be catalytic in nature. - Projects that have variety of constraints and require unique delivery capacity.	- Typically for projects initiated by public sector, requiring government approval, support and co-ordination; - capital intensive and unlikely to be undertaken by the private sector alone - include high initial risk profiles with a return on investment difficult to predict with certainty, which mitigates against private sector participation; - given their scale, can support government's socio-economic objectives, move the economy onto a new and more inclusive growth trajectory and stimulate employment opportunities; and - requires unique delivery capacity/vehicles that enables infrastructure delivery in a commercially viable and sustainable manner.	✓	✓	✓
Encourage a more compact form of development; Encourage integrated settlement patterns	Inner city environments experiencing urban decay where the City would like to facilitate the regeneration into dense and transit-oriented urban areas.	- Bellville CBD - Voortrekker Road Corridor - Wynberg PTI - Parow - Goodwood - Woodstock - Salt River	Urban Development Zone	- Delineated geographic areas - Urban centres and inner city environments (experiencing urban decay)	- Inner city environments experiencing urban decay where private sector development has been limited. - Areas where private sector investment in residential and commercial buildings is desired. - Limited to predefined geographic areas - The areas should have a high population carrying capacity with existing public transport infrastructure.			✓
	Encourage housing development in areas where the local government has identified a shortage of housing affordable to low- and moderate-income households	Khayelitsha	Small Scale Affordable Rental Units	There exists a burgeoning market of landlords doing self-build housing in incremental areas	- Incremental housing areas - Areas of informality - Sites which can support additional densification	✓		

Encourage a more compact form of development	The minimum off-street parking standards limits the full optimisation of total GLA in a development. New developments are required to allocate a certain portion of available parking area based on the size of the development which disincentives developing above a certain size.	Cape Town CBD	PT Areas	- Areas with developed public transport - Delineated geographic areas - Areas with high population carrying capacity	- Areas with high public transport accessibility, frequency and capacity - Aimed at achieving higher densities in urban areas through incentivizing development. - There is an existing demand for development and favourable market conditions.			✓
Encourage land use intensification in appropriate locations	Market demand exists but is constrained by land availability - Site fragmented ie. erven too small and/or in separate ownership - Land use rights are limiting relative to demand	TOD precinct, where demand exists, land opportunity. Eg Bellville PTI and surrounds	City-owned Land disposal	Ideally, property market in an upswing	- City-owned property no longer needed for public use - Municipality must have authority to dispose of public property for private development - Ideally dispose of land when market conditions are positive and where the site does not have major development constraints - Land may be disposed as an in-kind payment for infrastructure when the property has sufficient market value to enable a financially viable transaction - Land may be disposed as equity for development: - When there are challenges to redevelop the site making it unattractive to a private developer, the municipality may contribute the value of the land - When land is adjacent to privately owned sites and can be combined into one regeneration project - May be used to catalyse regeneration of a larger area where the market has lacked investment	✓		✓
Integrate land use, economic and transport planning and support the sustainable operation of the IPTN	Areas where the City would like to encourage private sector development through investment in land capital projects and/or leveraging land to partner with the private sector.	- Priority TOD Catalytic projects: - Bellville, Philippi, Foreshore, Paardevelei, Athlone	City-owned Land Acquisition (including Land Banking and Assembly)	- Areas of future opportunity - Areas where there is an identified need that the City can fulfil (i.e. public housing) - Servicing of land parcels	- Appropriate in locations which support City's TOD and spatial objectives but private sector interest is low - Property values are low - Areas with developed or planned future public transport - Private sector may be incentivised to invest in areas where City acquires land if those areas are subject to infrastructure-led development through public investment - Land assembly will allow for the sale of land, or if preferable, leaseholds	✓		✓
Enhance the unique sense of place and quality of the built form of Cape Town	Areas experiencing various urban management issues and urban decay.	- Cape Town Central CID - Observatory CID - Athlone CID - Parow Industria CID - Etc.	Special Ratings Areas (Improvement Districts)	Requires a rates base that can support the SRA. (i.e. not applicable in all areas)	- Existing rates base that can 'pay extra' for the additional services. - Organised, active community. An SRA is always initiated by the community and is run by the community for the benefit of the community, not by the City.		✓	✓
		- Athlone CBD - Bellville transport interchange - Bishop Lavis - Valhalla Park - Bonteheuwel, - Harare and Kuyasa transport interchanges, - Macassar, - Manenberg, - Hanover Park, - Mitchells Plan Town Centre, Nyanga/Gugulethu, - Etc.	Mayoral Urban Regeneration Programme	- Neglected and dysfunctional urban areas. - Lack of alternative funding for improved urban management.	- In former neglected and dysfunctional areas requiring upliftment. - Degraded and unsafe public transport interchanges and commercial corridors. - Public infrastructure maintenance and upgrades. - Areas where the social fibre has broken down and where there are a number of issues facing in particular the youth.		✓	✓
		Bonteheuwel Town Centre	Precinct Management Model	Lack of alternative sources of funding for improved urban management.	- Neglected Urban centres - CBDs, community nodes and town centres - In areas requiring intervention to prevent urban decay or improve existing urban management levels that do not have enough of a rates base to support the setup of an SRA.			✓
PROPOSED MECHANISMS								
City Objectives	Development Challenge	Illustrative Example	Potentially Appropriate Mechanism	Contextual Preconditions	When is this tool appropriate?	*	**	***
Encourage land use intensification in appropriate locations Encourage land use intensification in appropriate locations	Market demand exists but is constrained by land availability (or lack of appropriately packaged land) - Site fragmented ie. erven too small and/or in separate ownership - Land use rights are limiting relative to demand	- TOD precinct, where demand exists, land opportunity. Eg Bellville PTI and surrounds - Fisantekraal – Bellville Rail Corridor (land may be	Land redevelopment or readjustment scheme	There is demand for development and private sector interest	In urbanized area: - In a targeted redevelopment district where the municipality has modified zoning codes to increase the maximum floor area ratio - Where the market demand for high-density development is strong but where developable land is scarce			
						✓		✓
					On the urban fringe: - For new infrastructure projects that require land assemblage to build the infrastructure - In a market where the construction of the infrastructure is expected to result in a significant increase in the value of surrounding properties	✓		✓

		required as part of construction of second line)	Density bonuses	There is strong demand for additional development rights	- Where local property owners are willing to contribute their land to invest in improvements, in exchange for future personal gains - In strong markets where the municipality would like to encourage development of a public/social benefit not available through the private market - When market rents and/or home prices are high, land values are high, and land is scarce - Where the municipality supports additional density beyond what is currently permitted - Where there is sufficient capacity in the municipality to assign a dedicated team to administer the program			✓
		- Bellville CBD - The Voortrekker Road Corridor - Wynberg PTI - Parow - Goodwood - Woodstock - Salt River - PT1 and PT2 areas with good access to public transport	Proactive Upzoning / Rezoning (Substitute Zoning)	- There is demand for development and private sector interest - Delineated geographic areas - Urban centres and inner city environments (experiencing urban decay) - Areas with high population carrying capacity - Areas with developed public transport	- Where the municipality supports additional density beyond what is currently permitted - Municipality must have administrative resources - Where local property owners are willing to contribute their land to invest in improvements, in exchange for future personal gains - The areas should have a high population carrying capacity - Areas where private sector investment in residential and commercial buildings is desired.			✓
	Where DFAs intersect with heritage resources	DFAs which coincide with areas classified as or identified for investigation as having low/no conservation worthy heritage significance.	Heritage Exemption	Areas or sites with high urban development or redevelopment potential where heritage significance is limited or not conservation worthy in terms of S3(3) of the NHRA	- Areas of low or no heritage significance which are located outside the City's current and proposed HPOZ (Heritage Protection Overlay Zone). - This tool is appropriate in areas where the heritage value of the built environment is low and the exemption of the requirements of the NHRA will not have a detrimental impact on heritage resources and encourage investment in these areas.			✓
	NDAs which intersect with environmental resources	- NDAs that have the potential to be developed but that have some environmental features on it which cause it to have to go through extensive environmental authorisation process even though some of the sites are not considered to be of significant environmental value / protection. - NDAs located within the UIC which have development potential but a portion of the site are earmarked by environmental sensitive features such as CBA, rivers and wetlands.	Environmental Exclusion Area	- The sites which have been identified through the Land Use Model which are strategically located for a specific type of development (residential, commercial, industrial etc.)/ mix of developments. - Sites within Atlantis SEZ	- This tool is appropriate when there are sites that have high development potential to achieve the City's spatial transformational objectives to build integrated communities (i.e. essential social, recreational or urban infrastructure services, create job opportunities and provide affordable/subsidized housing) but which have some environmental sensitive features on it, however, often the environmental features are eroded / disturbed or only a portion of the site is earmarked as being environmentally sensitive. - This tool is appropriate when the listed activities that the proposed development may trigger in NEMA are not considered to have a detrimental impact on the environment and can therefore be excluded.		✓	
	Location supports City's TOD objectives but private sector interest is low	TOD precinct, where land opportunity. Eg Bellville PTI and surrounds	Tax Abatements	- Areas with high locational or development potential where interest would otherwise be lacking. - Should be limited to new investment. Ad hoc approach may be preferable so that City can gauge merits on a case-by-case basis.	- In a distressed market where property owners are not prepared to make improvements to their properties or where there is no demand to rent or purchase property - In a stabilized market if there is a lack of a social good e.g. affordable housing - To incentivise development without providing a direct cash subsidy or debt upfront - Municipality must have administrative resources			✓
	Areas which are strategically located but which for some reason are underperforming. These areas have high locational potential but due to lack of investment, capital flight of retail / commercial businesses, urban decay, crime and grime have experienced urban decay.	- Any District or geographically defined area within the City that are deemed to have high growth potential but that are underperforming. - Areas earmarked as Development Focus Areas within the applicable District Plans - Human Settlement Support Areas	Incentive Overlay Zone	- Should typically be focussed within areas which are located along developed public transport corridors / nodes - Areas which have potential for densification – CBD areas which are struggling with urban decay - Areas which have sufficient bulk infrastructure capacity - The proposed incentive should have been discussed and	- Not useful in weak markets where developable land is abundant and there is low demand for dense development, i.e. where developers can easily develop market-rate housing at lower densities and gain a decent profit, and they do not need additional density as an incentive. - Overlay zones should be used responsibly to avoid unnecessary confusion and administrative complications. - Effective in boom periods during areas of growth pressure. - Effective when trying to reach higher densities in certain urban areas and when the City want to incentivize development. - Incentive Overlay zones are excellent tools for where the base zones are compatible with the desired future.	✓		

	The challenge is to revitalise these areas through providing incentives through overlay zoning so that development and investment will be enticed in these areas.	New Development areas identified through the Land Use Model		tested with multiple stakeholders, especially the private sector / developers to determine whether it will be deemed as efficient / enticing to develop.				
Address spatial economic imbalances. Transform the apartheid city.	Affordable housing opportunities are not located in close proximity to economic or employment opportunities but there is a market demand for housing on well-located land.		Inclusionary Housing	- Demand for development - Private sector-led development	- Areas of the City with strong property markets (where there is existing value) - Strategically important transit-oriented development nodes, where density is desired - In areas with appropriate public education, health, social facilities, and near employment opportunities - In the rest of the City, an inclusionary housing requirement will be triggered when new rights are granted over a certain threshold (still to be determined).	✓	✓	✓
Facilitate small and micro scale economic development within areas accessible to scheduled public transport routes.	The informal economy experiences development challenges and require assistance / support to formalise and enable entrepreneurial efforts and SMME development operating from properties zoned SR 1 and 2 – especially within areas accessible to scheduled public transport routes where an appropriate mix of land uses should be encouraged.	High intensity residential land units and low intensity residential land units as depicted on the scheduled public transport accessibility map and as designated to have this overlay zoning (subject to the City's approval).	Scheduled Public Transport Accessibility Overlay Zone (SPTAO)	Land units within the designated scheduled public transport accessibility overlay zone.	- Appropriate in areas which experience high levels of pedestrian foot traffic, particularly those close to public transport services - Appropriate in areas which have a high concentration of informal business along structuring routes within neighborhoods, activity streets or development routes	✓		

Note:

- Certain projects may require the implementation of more than one mechanism in order to achieve the required objectives. How various tools are combined would be determined on a case-by-case basis depending on project-specific challenges and objectives.
- This table should be read in conjunction with

* Potential to generate capital financing

** Potential to generate operational financing

*** Potential incentive for private (re)investment

TECHNICAL ANNEXURE 13: PAARDEN EILAND MOTIVATION FOR RETENTION OF INDUSTRIAL ZONININGS – SPATIAL PERSPECTIVE

1. INTRODUCTION

Paarden Eiland is one of the key industrial nodes in the City of Cape Town. It is a strategically located, well-functioning 206ha industrial precinct, adjacent to the Cape Town Harbour. Paarden Eiland is situated along the R27 and falls across two districts, the Table Bay and Blaauwberg Districts. The study area, however, focuses on the Paarden Eiland Industrial area south of the Black River. This document seeks to provide guidance to structure the growth and development of the Paarden Eiland Industrial area.

1.2 OBJECTIVE

The main purpose of this report is to provide a contextual overview and analyses of the portion of Paarden Eiland south of the Black River.

This report analyses the importance of Paarden Eiland as a key industrial node to the Cape Town Port, and more specifically it's function as a key driver of the maritime industry. The initial base line report and analysis has provided a motivation for the protection of the industrial function of Paarden Eiland against future non-industrial development.

This report will, therefore, provide guidelines to support the continued function of Paarden Eiland as a key industrial node servicing the Port of Cape Town.

1.3 STUDY AREA

Paarden Eiland is strategically located adjacent to the Port, approximately 6km from the Central Business District (CBD), and roughly 15km from Epping Industrial. Wedged between the Port and the N1, Paarden Eiland acts as a gateway to the Blaauwberg District.

Paarden Eiland's urban form is predominately made up of two to four storey buildings, with adjacent parking lots. The land use is predominately used for light to medium industry that serves the port.



Figure 32: Location of study area

[The boundary of the Milnerton South – Paarden Eiland LSDF includes the residential suburbs of: Milnerton, south of Loxton Road including Woodbridge Island up to the first block of Koeberg Road; Brooklyn; Rugby; Ysterplaat Residential; Northgate Development (Brookrail); and Paarden Eiland (Metro Industrial). However, for the purpose of this report the study area focusses on only the industrial areas of Paarden Eiland South of the Black River.]

2. ANALYSIS

The following section analyses Paarden Eiland as an industrial node and its role as a key distributor of maritime related industries.

2.1.1. ENVIRONMENT

The Paarden Eiland South study area falls within the City's existing urban footprint and is predominately built up. Paarden Eiland is situated adjacent to the coast, however, the goods rail line acts as a barrier between the industrial park and the ocean. Thus, preventing direct access to the coast.

Furthermore, Paarden Eiland does not have any noteworthy biodiversity elements falling within the study boundary, however, flooding is a concern for the area, as it is bounded by the ocean to the west and the Black River to the north.

The state of the estuary, located directly north of the Paarden Eiland Industrial area, is an element of concern. The high rate of pollutants found at the estuary is not solely the result of the industrial area but instead results from pollutants throughout the Salt/Black River systems and Liesbeek river systems which traverse the area via the canal. Approximately 55 percent of the river has been canalised in an attempt to manipulate and control the flow through populated areas. Increasing canalisation of a river may affect the health and ecological integrity of riverine ecosystems.

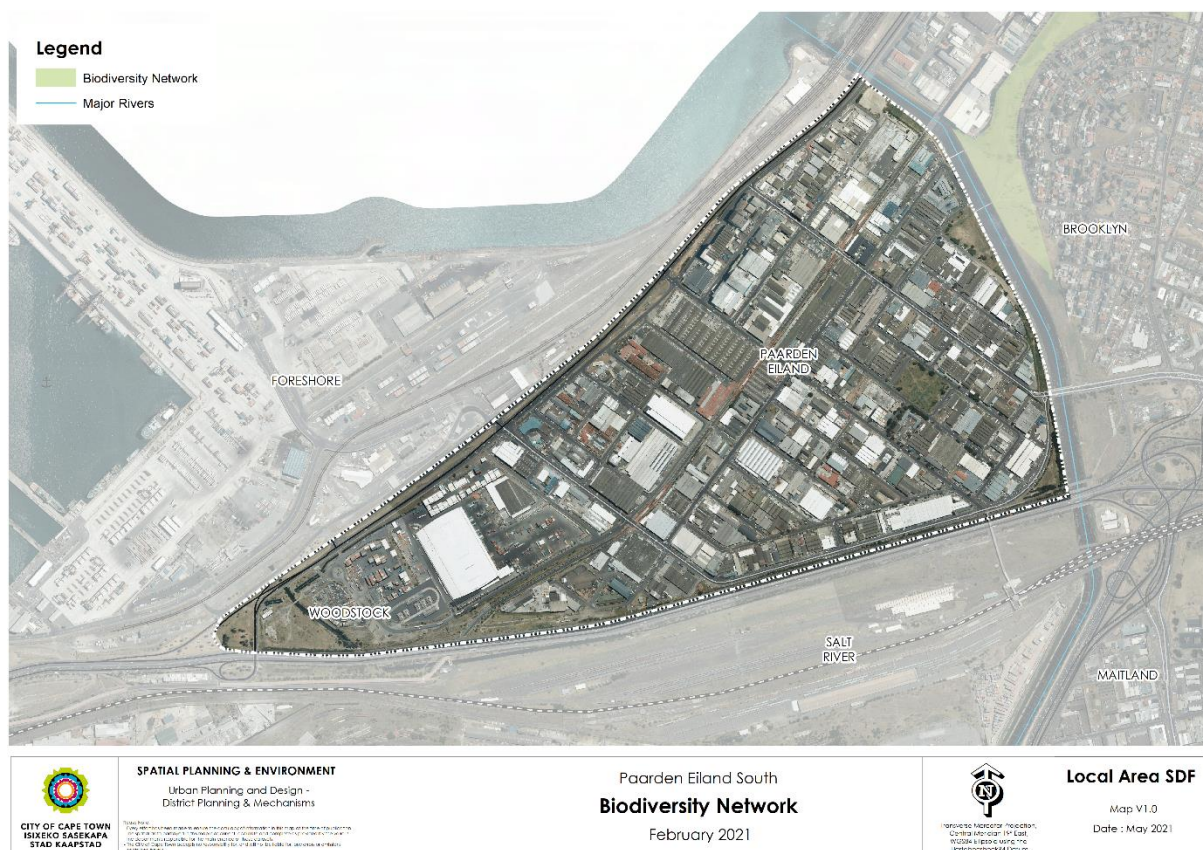


Figure 33: Paarden Eiland biodiversity network

Flood risk in Paarden Eiland is high given its proximity to the Black River, as well as the ocean. The City's Floodplain and River Corridor Management Policy (2009) states that residential development is not permitted within the 1:50 year floodline. Between the 1:50 to 1:100year floodlines, it is possible to have development as long as the floors are above the 1:100year flood level.

2.1.2 STORMWATER

Paarden Eiland is situated within a floodplain, thus, flooding, including coastal flooding, is a possibility. The stormwater network is limited to the capacity of the Slat River Canal. The increased development of Paarden Eiland may require further stormwater capacity to prevent flooding. This type of infrastructure is expensive and would require further analysis.



Figure 34: Paarden Eiland flood Risk

2.2 STATE OF THE BUILT ENVIRONMENT

2.2.1 URBAN STRUCTURE, LAND USE AND DEVELOPMENT TRENDS

Paarden Eiland is a unique industrial area within the metro in that it is most proximate to the Port. The built form found in Paarden Eiland is most typically represented by large two-to-four storey industrial buildings that do not interface with the street in a human-scaled manner (TDA, 2018). These warehouses often do not have a “front-of-house” nor a “back-of-house”, the buildings are designed to accommodate easy delivery operations.

Paarden Eiland’s large plot sizes accommodate the expansion and contraction of commercial or industrial activity. Evidence of this is where a large warehouse on a single plot is subdivided into numerous smaller warehouses to accommodate the company’s growth or cycle changes (TDA, 2018).

Paarden Eiland is bounded by significant road networks that support the movement of goods to regional hinterlands (TDA, 2018). While access to freight routes is strong, the position between infrastructure networks and the Canal provides limited outward growth options, save for Transnet land opposite the N1 should it become available for redevelopment in the future.

2.2.2 ZONING AND LAND USE

Paarden Eiland is a key industrial park – the area, therefore, accommodates primarily industrial zoning and land use types. Although Paarden Eiland is an industrial area it does not accommodate high risk activity, thus, the release of noxious gases is not present. Paarden Eiland is zoned largely for General Industrial 2 with a small portion zoned for General Business 6.

GENERAL INDUSTRIAL 2

General Industrial 2 supports manufacturing and related processes, including noxious or hazardous activities that may have severe impacts on neighbouring areas. However, no activities releasing noxious gases are present in Paarden Eiland. Road

infrastructure in industrial areas is designed to accommodate large freight trucks, which are used to distribute and deliver manufacturing inputs and products.

The General Industrial Zoning aims to promote the manufacturing sector of the economy, which includes all forms of industry except hazardous industry. The zoning permits the inclusion of non-industrial activities provided that industrial activity is not compromised.

GENERAL BUSINESS 6

General Business 6 permits general business activity including mixed use development of a medium to high intensity. Although the zoning supports a range of mixed use activities; these uses still need to comply with local guidelines, bulk services, and the availability of transport infrastructure. Thus, the land use would need to promote and encourage an appropriate interface between mixed use, industrial areas, and surrounding residential areas.

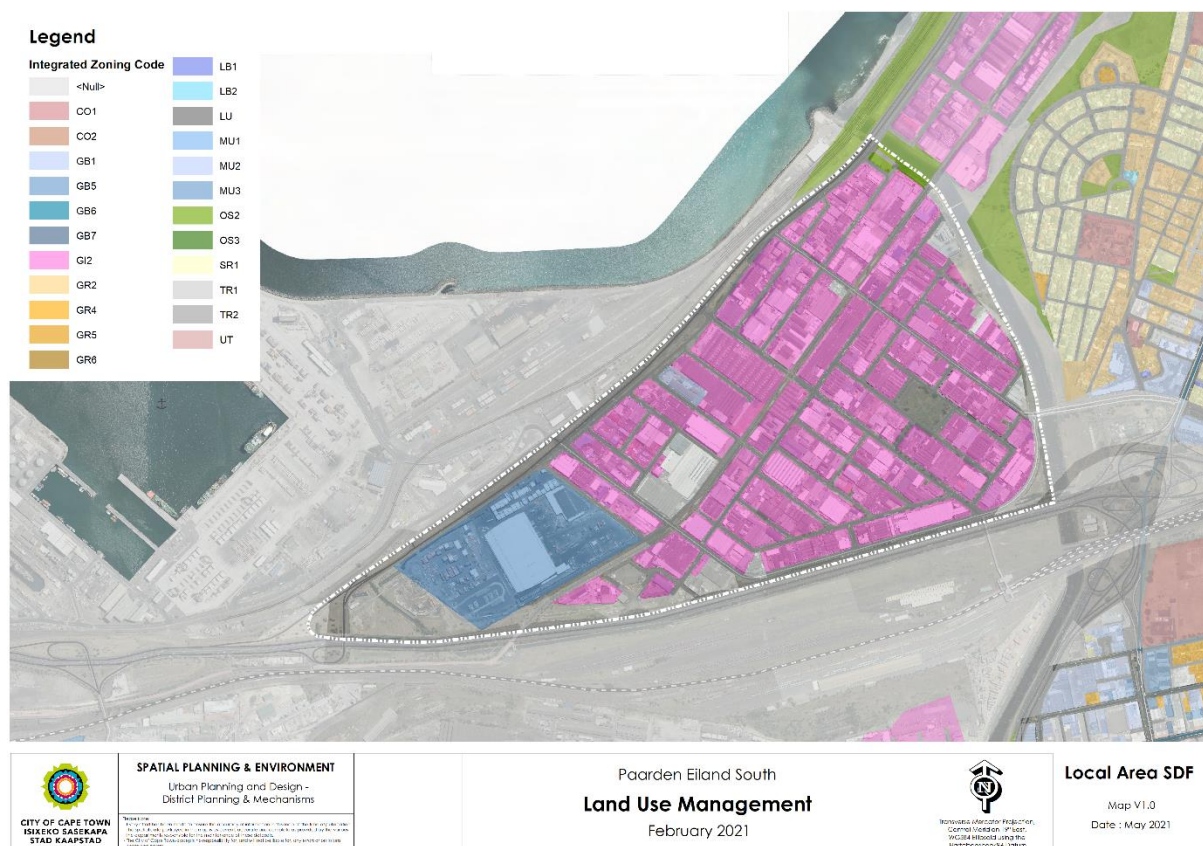


Figure 35: Paarden Eiland Zoning Scheme

LAND USE AUDIT

A recent land use audit was conducted to analyse the types of land uses taking place in Paarden Eiland. The study presented the following categories as the main land uses across Paarden Eiland: business park, engineering services, logistics, manufacturing, Office use, recycling, restaurant, service station (gas station), showroom including sales and retail, utility, and vacant land. The land use audit also highlighted the importance of the maritime cluster located in Paarden Eiland.

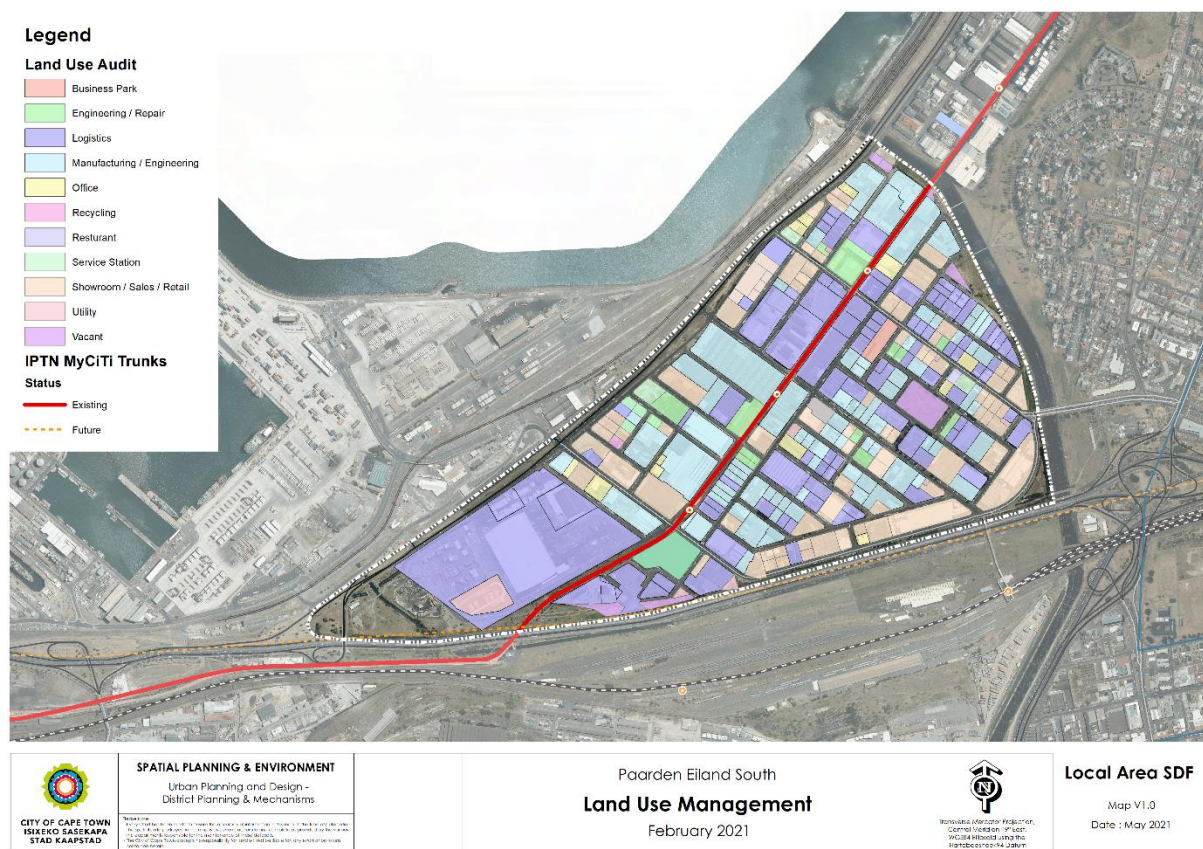


Figure 36: Paarden Eiland Land Use Audit

3 DISCUSSION

This section will discuss the argument for retaining the continued industrial function of Paarden Eiland.

3.1 PROXIMITY

Paarden Eiland is strategically located in reference to the Port, the CBD and higher order mobility routes. The industrial area is bounded by the N1 and the R27 both important mobility routes, as well as the freight rail adjacent to the west of Paarden Eiland.

Paarden Eiland's importance as a key industrial node and direct supplier to the Port is enhanced by its location and accessibility of maritime services. Thus, supporting the preservation of the Maritime cluster located in Paarden Eiland is critical to maintain the highest function and capacity of the Port.

3.2 MARITIME CLUSTER

A significant portion of the industry in Paarden Eiland is centred around the Maritime cluster, which includes industries such as boat building, engineering facilities, servicing industries, retail and safety equipment. The boat building cluster is located in Paarden Eiland because there is good access to the Port for launching, testing and transport abroad. Proximity to subsidiary parts of the value chain and accessibility for staff via the train or private vehicles (less so on MyCity buses) is also an advantage.¹³

The location of Paarden Eiland, though not on the water is exceptional when compared to other locations such as Atlantis or Montagu Gardens. The loads transported are abnormal and large which impacts on appropriate routes due to wide turning circles required by the transport vehicles, bridge clearance and overhead poles. Paarden Eiland's supporting infrastructure of wide roadways and proximity to the Port accommodates these requirements. Furthermore, the building typologies available in Paarden Eiland are specialised and have the required height

¹³ Economic Analysis Inputs into the Land Use Applications for Paarden Eiland: The Importance of the Boat Building Industry in Cape Town
Report prepared by: Tamsin Faragher (Enterprise and Investment) and Paul Court (Organisational Policy and Planning)
Date: 22 November 2018

clearance that allows for internal crane access and the safe egress of boats/catamarans via large doors (up to 20m).

Interviews with businesses in the Maritime Cluster undertaken In 2019 indicate that rezoning presents a significant risk to companies operating in Paarden Eiland as the majority of businesses operate from rental premises, with the exception of Nautic (and Veecraft). Tenure insecurity for most boatbuilding companies emanates from short leases (2 to 5 years) with private property owners and Transnet, some with the option to renew, others not. Furthermore, most businesses have made capital investments in the properties they lease (up to R20 million) which would be lost in the event that leases are not renewed due to perceptions that they may receive better offers for their properties.

Cape Town's boatbuilding sector is the largest in South Africa and is a global competitor in the United States, Europe and Africa. In addition to the boat builders identified in the table above, an extensive marine services and manufacturing supply chain exists in Paarden Eiland. This includes chandlery, ship repair, rig repair, maritime focused mechanical engineering, wholesale of shipping components and the fishing industry, among others.

A number of statistics presented in an economic impact report of the boat building industry, commissioned by the Marine Industry Association of South Africa (MIASA), reveals the extent to which the industry is a comparative advantage for the Western Cape. Given that Cape Town is the main maritime hub in the province, a number of the statistics presented below can be taken as a proxy of the industry within Cape Town.

- According to the MIASA report (2015) report, "the Western Cape is the largest marine manufacturing centre within South Africa"
- 45% of South Africa's boat builders are based in the Western Cape (the overwhelming majority of these are based in Cape Town) (MIASA, 2015)
- The industry in the Western Cape has a much higher export propensity. In 2015, 90% (R2,3 billion) of all boat export revenue in South Africa is generated in the Western Cape (MIASA, 2015)

- Almost 50% of total employment in the industry, based on a sample of boat building companies, is located in the Western Cape (MIASA, 2015)
- Cape Town has South Africa's only boat building school. "False Bay College has approximately 60 students graduating annually with a National Certificate: Yacht and Boat Building (NQF levels 2-4).
- Cape Town companies therefore generally do not have any skills shortages in technical areas. However, companies in the Eastern Cape, Durban, and Gauteng have found a lack of skills to be a constraint to operation" (DTI, 2012)
- 55% of boat builders in the Western Cape had indicated that they were thinking of expanding their operations, this compares with 30% for KwaZulu-Natal boat builders and only 11% of Gauteng based boat builders

The findings presented above would seem to provide evidence that the Western Cape and Cape Town in particular, when compared to the rest of the country, has a comparative advantage in the boatbuilding industry

The maritime cluster is an important aspect of the economic activity taking place in Paarden Eiland as well as the Harbour Industria. Harbour Industria recorded the highest location quotient of 22,5 in maritime activities, with Paarden Eiland recording the second highest location quotient of 8,1.

Thus, the preservation of maritime activity in Paarden Eiland is important to ensure services are accessible to the Port and to ensure the maintenance of job generating activity in the maritime sector within Cape Town.

3.3 ECONOMIC ACTIVITY

Paarden Eiland is strategically located to support the industrial needs of the Port and according to the table below 'yachts and pleasure vessels are considered one of Cape Town's top 10 exports. The export of 'yachts and pleasure vessels amount to 2.4% of the total exports and have a 48.4% year-on-year growth in 2020.

Table 19: Cape Town's Top Exports

TABLE 5: CAPE TOWN'S TOP 10 EXPORTS, 2020 Q3			
CAPE TOWN'S TOP EXPORT CATEGORIES FOR 2020 Q3 (HS 4)	ZAR MILLION	% OF TOTAL EXPORTS	YEAR-ON-YEAR GROWTH, 2020 Q3
Citrus fruit	R4 473,7	18,6%	22,0%
Refined petroleum oils	R1 642,3	6,8%	-62,6%
Apples and pears	R1 256,1	5,2%	14,8%
Diagnostic or laboratory reagents	R1 151,9	4,8%	2 508,5%
Animal or vegetable oil or fat	R719,1	3,0%	11 377,6%
Animal feed	R670,5	2,8%	170,2%
Wine	R656,9	2,7%	23,1%
Yachts and pleasure vessels	R573,3	2,4%	48,4%
Jewellery with precious metal	R561,1	2,3%	67,3%
Cigarettes and tobacco	R528,4	2,2%	24,4%
Total of top 10 export categories	R12 233,2	50,8%	
Total of ALL products	R24 072,3	100,0%	5,9%

Source: Quantec, own calculations, November 2020.

Note: Only the top 10 exports at an HS4 level are shown in the table above.

“Cape Town is home to almost 70% of the local boat-building industry within South Africa and offers world-class technical skills to service all types of ocean-going craft.”

According to Figure 37 below the total boat and ship exports from Cape Town has grown drastically over the last 10 years. The sudden decline in exports from 2019 and 2020 could be attributed to the struggling economy during the Covid-19 pandemic.

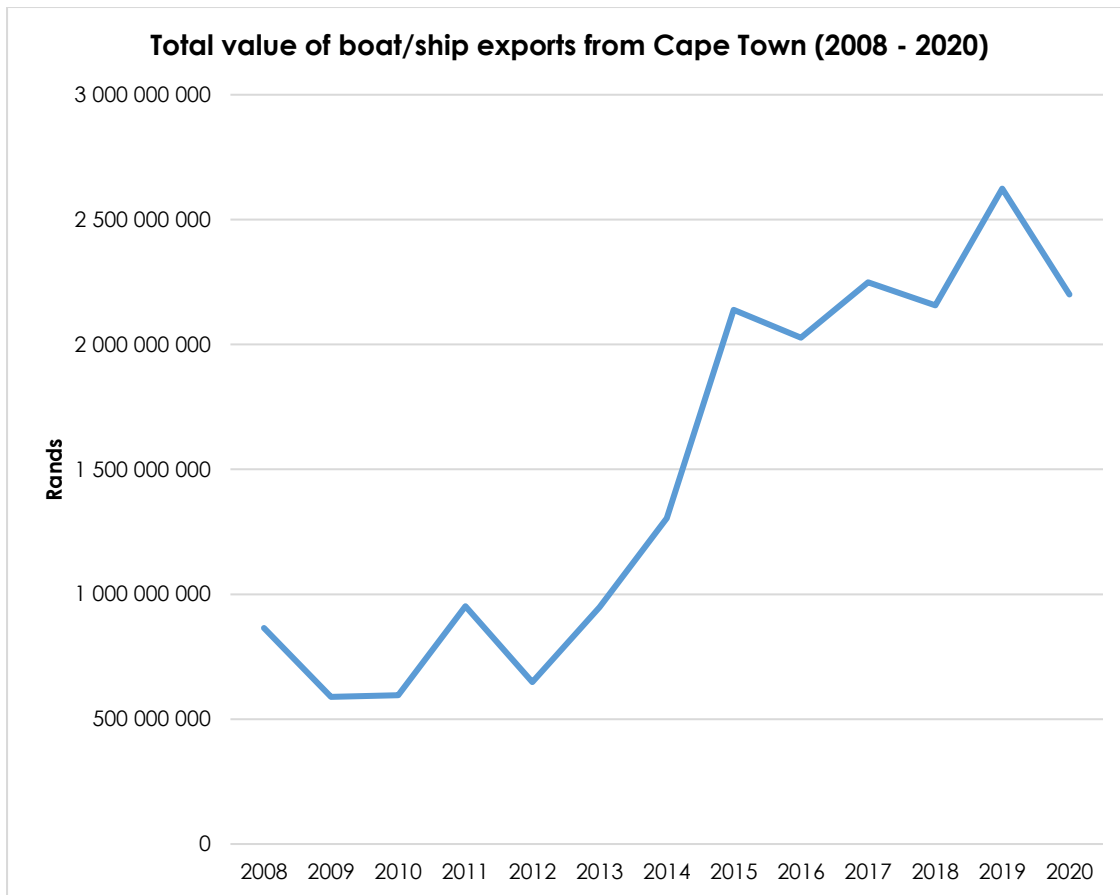


Figure 37: (Paul Court; Economic Analysis, Policy and Strategy Department)

The export of maritime related goods is a large contributor to the export of Cape Town. However, within the thriving maritime industry, the export and sale of yachts and pleasure vessels is by far the most active. The chart below demonstrates the steady increase of yachts and pleasure vessel export rates.

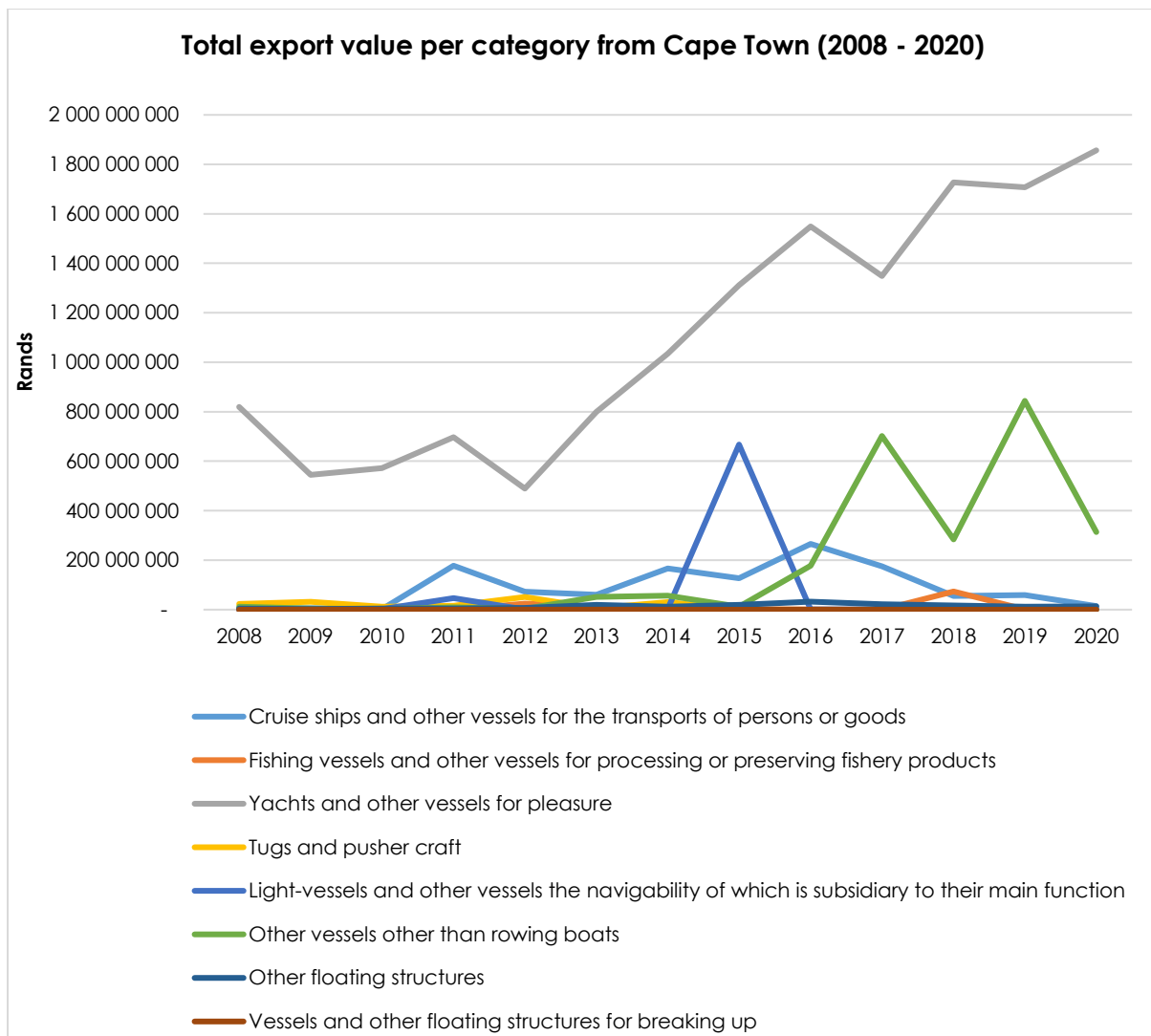


Figure 38: (Paul Court; Economic Analysis, Policy and Strategy Department)

The market performance and long-term location potential of Business Districts across the Metro are tracked and accessed using The Economic Areas Management Programme (ECAMP). The information collated is translated into the latest approved Metropolitan Spatial Development Framework (MSDF) (2018).

The most recent ECAMP assessment confirms that Paarden Eiland is performing well, is not in decline and does not require repositioning (TDA, 2018). Given Paarden Eiland's proximity and relationship to the Port, Policy 32.4 of the MSDF as follows, would apply:

"In locally-orientated and spatially constrained industrial pockets, protect established industrial areas."

Figure 39 below breaks down the economic activity within the Paarden Eiland maritime cluster. According to the figure, the repair of transport equipment, except motor vehicles constitutes a total of 30,77 percent of the businesses in the Maritime Cluster. The second largest economic activity is the wholesale of other machinery and equipment.

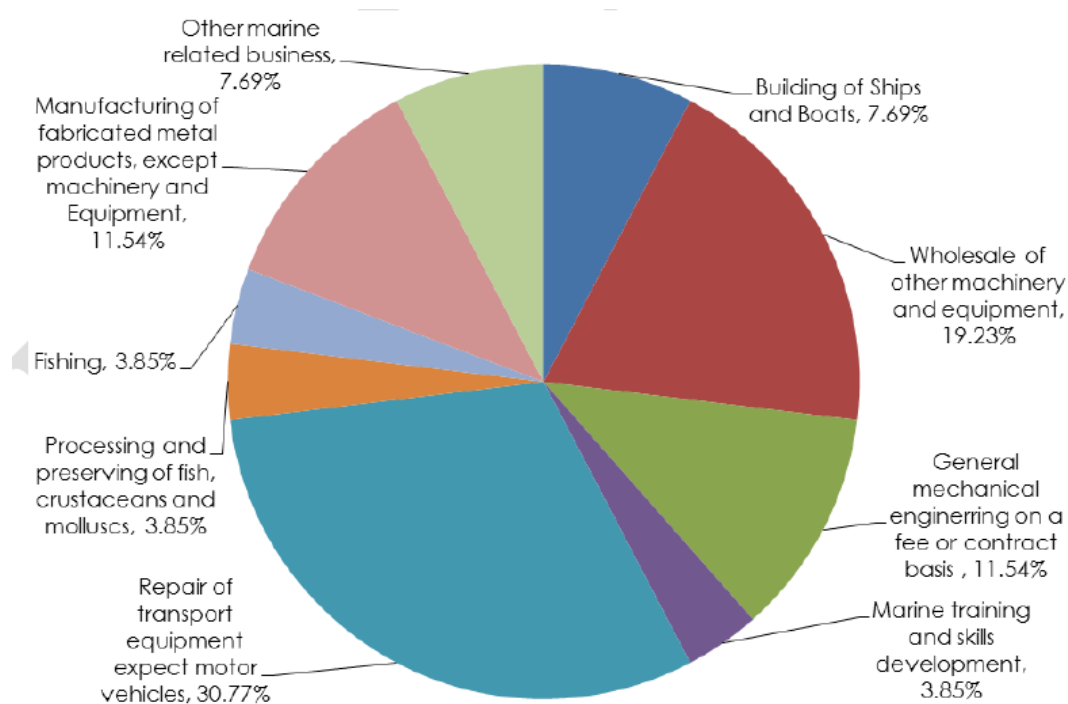


Figure 39: Economic activity of businesses in the Paarden Eiland Maritime Cluster (TDA; Paarden Eiland: Background Planning Document, 2018)

The Industrial Survey reinforced Paarden Eiland's importance as a key contributor to the maritime sector and a supporting industrial node for the Port.

The location of **businesses servicing the maritime sector** is also of key importance as equipment used by ships or boats for instance cannot be easily transported especially long distances. If these businesses were to be located further inland, technical issues arising at sea will not necessarily be attended to in due time as these technicians or engineers will need to travel to these coastal regions, or conversely the equipment will need to be transported inland, in order to be repaired.

A change in the land use of Paarden Eiland which may price out industrial activities may have very negative effects on both the logistics and maritime industries in the City, both of which would find it difficult to operate their businesses from different

locations. In many cases the proximity of these types of businesses to the Port is essential to their survival.

According to the map below all the properties depicted in blue have maritime-related activity occurring. It is clear that there is still a strong representation of maritime-related activity taking place in Paarden Eiland.

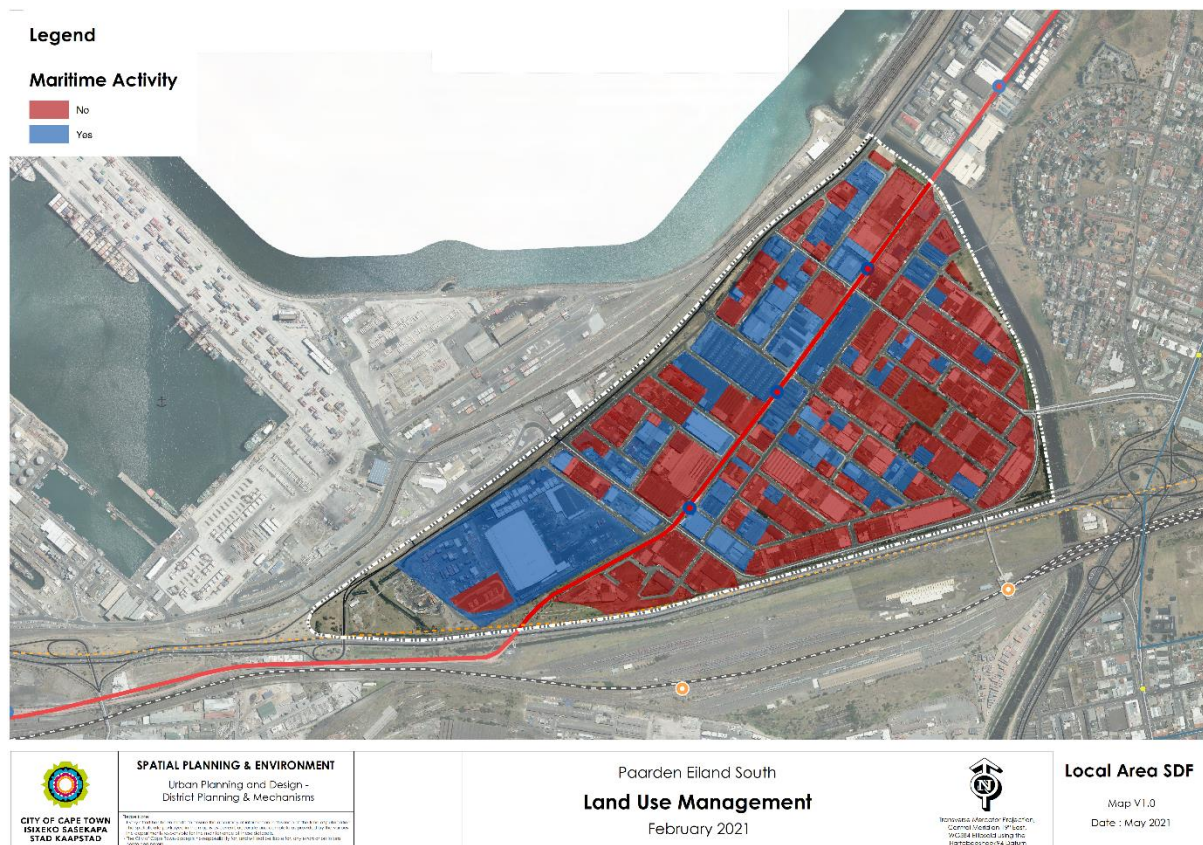


Figure 40: Paarden Eiland's Maritime Cluster

Paarden Eiland has seen an influx of commercial and retail activity over the past few years, in particular building materials such as tiles and bathroom supplies. Small business hubs, hosting commercial, retail and hospitality services, has increased in certain areas of Paarden Eiland, particularly along Service road.

There is a continuous demand for land close to the CBD, thus, Paarden Eiland's strategic location is under constant threat for non-industrial development. The northern portion above the Black river along the R27 has seen a demand for non-industrial activity and is putting pressure on the southern portion to unlock additional

land. Figure 41 below taken from the Paarden Eiland South Local Area Plan (2015) identifies areas for residential and mixed use developments, clustered around important mobility and public transport routes. The figure also depicts a southerly continuation of mixed-use development. This type of development requires properties to be rezoned to facilitate other land uses, which may increase the value of land in Paarden Eiland. Increasing land value poses a threat towards the maritime cluster found in Paarden Eiland and should be mitigated if it will price out industries that service the Port.

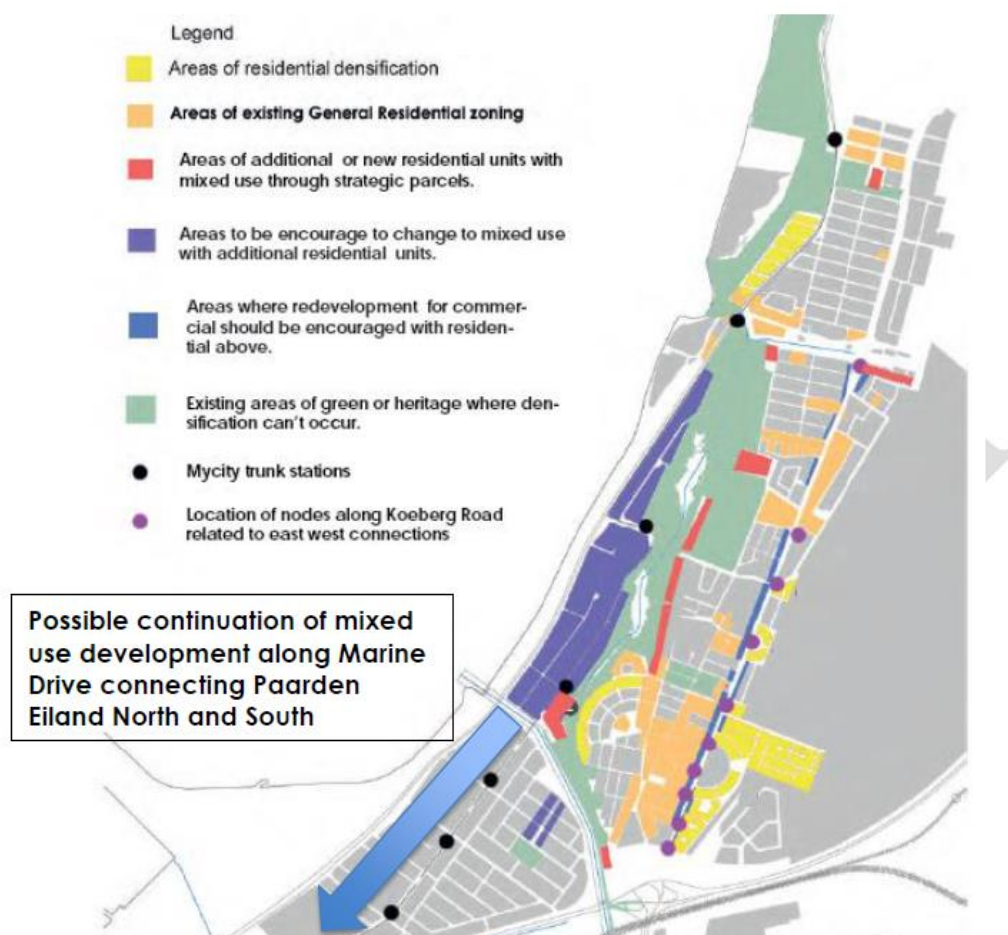


Figure 41: Shows areas identified for development (Paarden Eiland South Local Area Plan, 2015)

The southern portion of Paarden Eiland has seen some applications to allow for uses other than industrial. The map below depicts the properties that have been approved for rezoning, and which are pending approval for other land uses.



Figure 42: Land Use Applications

3.4. PUBLIC TRANSIT

Paarden Eiland is situated approximately 7kms from the CBD, making it an ideal location for TOD. The northern MyCiti trunk route runs through the centre of Paarden Eiland, with three MyCiti bus stops. All three stations are well located and accessible throughout the study area. However, the trunk route is situated on the backwards facing side of buildings on either side of the road, essentially emulating an alley way with no 'eyes on the street'. Therefore, non-motorised transport (NMT) activity along the MyCiti feels unsafe and the full potential of the infrastructure is not reached.

3.5 FREIGHT MANAGEMENT

The transport infrastructure in Paarden Eiland is designed to support large reticulated trucks and the movement of boats to the harbour for launching. However, recently Paarden Eiland has become a site of informal Truck Staging for trucks waiting for Port access when the Port roads are congested. This has caused conflict with surrounding

businesses and challenges regarding infrastructure maintenance and the smooth flow of traffic in the Port.



Figure 43: Freight staging

The City's Freight Management Working group is currently considering a number of alternatives to resolving this problem, including opening up internal staging sites and developing new connections into the Port from the N1.

The resolution of this challenge will ease operating constraints for business requiring large freight movements in the Paarden Eiland area.

a. RESIDENTIAL ACTIVITY

Including residential activity in Paarden Eiland has been a contentious topic for some time. The City's emphasis on Compact form led to the 2012 District plan outlining Paarden Eiland as a "mixed use intensification" area. Bringing more homes into well located areas is a priority of the City and industrial areas can offer what may seem to City's like less costly opportunities for residential development. However, what makes inner city areas well located for human settlement is the proximity of a variety of jobs,

therefore maintaining the viability of economic areas is a key consideration in the bigger human settlement picture. Paarden Eiland is a job generating area in a sector that supports a variety of skill levels, the repercussions of including residential activity in Paarden Eiland may be catastrophic and are irreversible for industrial productivity and in particular the maritime cluster. The risks include raising land values and forcing industries out and increasing the potential for land use conflict- though the latter can arguably be managed through good urban design. It is essential for the productivity of the Port and the maritime sector in Cape Town to maintain the viability of the industrial node and prevent rezoning to other land uses.

Paarden Eiland as an industrial node is likely to have industries that produce excessive noise and chemical smells during manufacturing processes. Whilst nuisances such as noise and smell may be tolerated by other industrial industries and even other compatible land uses – it may prove to be a constant nuisance for any residents in Paarden Eiland increasing the chance of land use conflict. In addition, wide road infrastructure designed for reticulated trucks does not create a hospitable or friendly environment for pedestrians. The current truck staging issue also further exacerbates the natural flow of traffic and inhospitable feel of Paarden Eiland as a place of residence.

Areas of residential activity need to have access to social services such as schools, clinics, libraries, sports fields, areas for religious practice and post office. In the case of Paarden Eiland these services are nearly all unavailable.

The inclusion of residential activity in Paarden Eiland is a risky endeavour as it is likely to price out the maritime cluster and force industries to move due to potential nuisances such as noise and smell complaints. Therefore, in order to preserve the maritime cluster, it is essential to keep Paarden Eiland industrial focused.

4 GUIDELINES

Spatial Development Objectives		Supporting Development Guidelines
Land Use / Character	Support the retention of industrial uses in association with the port.	1. Ensure protection of industrial uses that benefit from port proximity. 2. Maintain location conditions for a maritime and logistics cluster in proximity to the port. This includes discouraging speculation by not allowing further rezoning of land to Residential, Mixed Use or General Business.
	Manage interfaces with port and industrial uses to minimise disturbance and improve efficiency. Ensure uses are compatible with intensive industrial and logistics functions.	3. Industrial is the preferred land use in Paarden Eiland with potential for intensified commercial consent uses. 4. Flexible and mixed building plates supported with the goal to support a range of industrial uses. 5. In Paarden Eiland discourage the dominance of warehousing, storage and other non-employment intensive land uses, unless specifically related to, or reliant on close proximity to the port or maritime activity.

Movement	Support improved freight logistic operations through the port and surrounding areas.	1. Support proposals to improve access between port and back of port activities, including truck staging and circulation in the Port road network in order to prevent congestion and heavy vehicle traffic in surrounding residential neighbourhoods. 2. Support more intense industrial development in close proximity to Phase 1A trunk service in Paarden Eiland. 3. Ensure that changes to the freight and logistics network accommodate the movement of loads produced in Paarden Eiland, making provision for height clearances of leisure vessels and other maritime products.
	Protect and enhance the network of pedestrian and cycling routes and facilitate increased accessibility.	1. Support improvements to the pedestrian environment by encouraging active building frontages where possible or appropriate, 2. Support urban management initiatives to improve the security of routes through industrial areas.
Open Space and Environment	Protect and enhance the amenity value of open space and promote conservation of the environment	3. Encourage interventions that optimise the green/blue corridor through Paarden Eiland and encourage interventions that reduce the outfall of pollution into the ocean.

5 CONCLUSION

In conclusion based on this report it is evident that the future of Paarden Eiland as a key distributor and supplier of maritime related services is essential not only for the Port but the export of yachts and pleasure vessels to other countries too. It plays a vital and irreplaceable role as an employment node in this sector. Therefore, if other non-industrial development is allowed in Paarden Eiland it may increase the value of land and force the maritime cluster to move to areas where the land rental is cheaper, the sector relies on port proximity and therefore a move from Paarden Eiland would likely mean moving away from the City of Cape Town, precipitating the loss of one of the most valuable export markets in the City.

The City faces a trade-off, either allowing additional mixed use development, or maintaining the maritime cluster in Paarden Eiland.

The proximity and accessibility of the maritime cluster in Paarden Eiland to the Port is essential and it is a unique location that needs to be it is recommended that it is protected against development pressures for residential and or hospitality development land near the CBD and the industrial uses be supported and maintained.

4.1 REVIEW

It has been proposed that a 5-year review for the development guidelines and future of Paarden Eiland should be considered.

TECHNICAL ANNEXURE 14: PUBLIC COMMENTS AND RESPONSES

Comments and Responses on Integrated District SDF - EMF advertised 6 June - 30 August 2022

Comments and Responses on Integrated District SDF - EMF advertised 6 June - 30 August 2022				
Admin	Comment summary/contents			Response and Action
Nr	Comment summary/contents	District Plan Overall Theme/ Common Concerns	District Plan Sub theme	Response
1	Appreciate document revisions. Support inclusive economic development and spatial justice as a priority. Development must not deteriorate much needed green relief space in Woodstock. Increased density needs to be monitored in terms of traffic and sewerage. sceptical about mixed market models- promote social projects for infill. mixed use intensification needs to be sensitive to low density adjacent properties. Buffes between existing housing and new MMU developments. Take into account living heritage of established communities and avoid negative externalities. Granting additional bulk must be coupled with inclusionary housing and economic opportunities and contributions to functioning of public environment. Water mapping for Trafalgar Park.	SDF/EMF	Urban Development	The constructive feedback is appreciated. Will endeavour to give more emphasis to the need for improved open and public space in association with intensification of the neighbourhood. Water resource mapping for Trafalgar Park is underway.
2	Resubmission of previous comments	SDF/EMF	General / Other	A task team in the City is responding to the challenge of homelessness and the spatial location of homeless services. As this is a dynamic space we aren't in a position to provide more than general guidelines as to the need to consider these services as part of civic precincts in a plan at this scale.
3	Detail comments on sub-district guidelines, express need for assessment of infrastructure capacities. Not to strain the infrastructure in an already strained neighbourhood. Need to improve green space provision and ensure green spaces are preserved, support for public transit and NMT. Need for new movement connections e.g. Frans Conradie, to benefit the area. Concern not enough emphasis on practicalities of how to acheive vision and how to implelement climate sensitive planning. Need to adress apartheid spatial planning legacy.	SDF/EMF	Urban Development	Greater emphasis will be given to the concerns around maintaining green space and the need for future transport links to benefit and avoid negative impact on the area. Several of the questions will be answered in more detailed scales of planning.
4	Proposals that Erf 2802 be determined open space constitute an enfringement on rights in terms of the Bill of Rights. Oudekraal should be included in the incremental growth area.	SDF/EMF	Development Edges / STAs	The spatial plans do not give or take away rights, but reflect a desired end state. A site specific application is available in terms of SPLUMA.
	Health and happiness needs emphasis. Transport system creates frustrutation. Focus should be on reducing the transit distance. Change from centralised to decentralised city.			
5	Support growth of mixed use development in Paarden Eiland. Challenge assumption of pricing out oceans economy as a result.			The comment hasn't provided compelling evidence that contradicts the concern that a land use change in Paarden Eiland wouldn't push our currently acitve oceans economy industries. They also incorrectly indicate that the Marine drive area isn't where the industry locates. Our data suggests otherwise. The District Plan therefore has chosen a protective stance against land use change.

6	Note buffer properties being incorporated. Refer to Marine Protected area. WHS guidelines don't apply to natural sites. Development guidelines to make reference to protected area management plans.	SDF/EMF	General / Other	The plan will be updated to reflect the comments.
7	Recommendation for Khoikhoi national monument on Devils Peak.		General / Other	Beyond scope of District Plan. Recommend proposal be forwarded to Table Mountain National Park for consideration.
8	Support for boat building cluster in Paarden Eiland and spatial intelligence on marine economy around the City/	SDF/EMF	Industrial	Comments noted, the Table Bay District SDF has adopted a conservative position relating to land use change in Paarden Eiland to support this cluster. The Mixed use intensification areas in Salt River/Woodstock will be edited to exclude industrial area. No residential is proposed at Culemborg, this confusion is due to the commenter using the incorrect legend for the DSDF map, which shows all NDA's in yellow.
9	Terms and definitions for HPOZ needs to be provided. Various changes suggested to sub-district guidelines.	SDF/EMF	General / Other	Comments on sub-district guidelines will result in changes to the document, heritage management challenges forwarded to heritage department.
10	Suggestions relating to heritage provisions. "the SDFs, as the most obvious source of policy-directive in the discretionary decision-making required in every HPOZ-related application, should be much clearer and should refer directly to the character and significance of the HPOZs, should also be congruent with or recognize other relevant policy (for example, the densification policy), and should give clear policy guidance in the balancing of heritage-related demands and the implications of the zoning provisions regarding potentially inappropriate permissible floor areas, heights and setbacks. As we have pointed out, the MPB-L requires that district SDFs must provide land use management guidelines that relate to desirable land use patterns and appropriate development densities and urban form"	SDF/EMF	General / Other	Heritage guidelines are being revised for the District Plans in consultation with the relevant City departments. Some level of detail is more appropriate for local area planning or the Municipal Planning by-law review.
11	Question the route designations- only Main/Regent roads considered activity route. Propose retention of residential in areas between Main/Regent and promenade. Mention specific local heritage gradings. Concerns with transport conflicts, PT zones and lack of organised taxi facilities. support priority parking for residents. Note challenge with sewerage disposal and sustainability of outfalls.			Activity route designation hasn't been used- instead development routes of different scales- the development route is equivalent to activity route. More detail statement of heritage significance will be included. Transport comments forwarded to urban mobility. Detailed sanitation master planning will be required to address sewerage capacity.

12	Specific comments and questions on the Baseline document. Need for more emphasis on Cape Town's cultural resources. Also need for recognition of Pavillion and Precinct plan in Regent Road.			Constructive comments on the Baseline document, which will be updated prior to final publication. Destination place categories can be added in recognition of cultural contributions of Pavillion and Regent Road.
13	The final document must be more usable, with clear reference to sections in other volumes that may be relevant to the guidelines in Vol 2. Beach road overscaled and could better accommodate NMT. Traffic management and cleansing must be part of events. Detailed assessment of parking requirements for the area is needed. Hotel school site/is earmarked for 'mixed use intensification' views should be preserved across this site.			Constructive comments on document structure will be noted and the usability and cross referencing reviewed. MU designation will be revised.
14	In depth comments and various corrections proposed relating to overall documents received. Especially related to: 1) Proposed new development areas in relation to biodiversity corridors and waterbodies (including floodlines); 2) Mapping irregularities and areas of uncertainty relating to environmental elements	SDF/EMF	Environment	Comments noted and needed corrections have been amended accordingly. Additional responses to comments have been captured and sent to line department in response.
15	In depth comments and various corrections proposed relating to overall documents received. Especially related to: 1) New Development Areas ; 2) Mapping irregularities and areas of uncertainty relating to environmental elements	SDF/EMF	Environment	Comments noted and needed corrections have been amended accordingly. Additional responses to comments have been captured and sent to line department in response.
16	In depth comments and various corrections proposed relating to overall documents received. Especially related to: 1) Promoting development and updating guidelines that are sensitive to the protection of heritage assets of the City; 2) Mapping irregularities and areas of uncertainty relating to Heritage and environmental elements	SDF/EMF	Environment	Comments noted and needed corrections have been amended accordingly. Additional responses to comments have been captured and sent to line department in response.
16B	General comments to be noted: Volume 1: - Numbering throughout document is incorrect and does not correspond to Table of Contents. - State of the Built Environment and Risk and Resilience, State of Economy sections not integrated into document in term of page numbering. - Proof reading required – punctuation, capitalisation errors	SDF/EMF	Environment	Comments noted and needed corrections have been amended accordingly. Additional responses to comments have been captured and sent to line department in response.
16C	General comments to be noted: Volume 2: - Draft now out for comment is still labelled January 2022. It is assumed that this is the correct version and that inputs from the previous comment period in 2022 have been incorporated. - Check EHM previous comments - The integration of EMF components into the main section of the DSDF document is positive and more userfriendly. The mapping related to this (figures 12, 13) however needs refinement to ensure easy reference to the spatial planning categories and district features noted in the tables and to clarify where the guidelines are applicable.	SDF/EMF	Environment	Comments noted and needed corrections have been amended accordingly. Additional responses to comments have been captured and sent to line department in response.

17A	Volume 1: In depth comments and various corrections proposed relating to overall documents received. Especially related to: 1) Document structure refinement and clarity; 2) Mapping irregularities and definitions related to GINet and Environmental Spatial Implications	Process / Structure of docs	Environment	Comments noted and needed corrections have been amended accordingly. Additional responses to comments have been captured and sent to line department in response.
17B	Volume 2: In depth comments and various corrections proposed relating to overall documents received. Especially related to: 1) Mapping irregularities and areas of uncertainty relating to environmental elements; 2) Guidelines related to GINet and Natural assets and conservation	SDF/EMF	Environment	Comments noted and needed corrections have been amended accordingly. Additional responses to comments have been captured and sent to line department in response.
17C	Volume 3: General comments and various corrections proposed. Especially related to: 1) Environmental Protection Areas; 2) Mapping; 3) Urban restructuring	SDF/EMF	Environment	Comments noted and needed corrections have been amended accordingly. Additional responses to comments have been captured and sent to line department in response.
17D	Volume 4: Comments and various corrections proposed relating to overall documents and especially to definitions and terms relating to GINet and environment.	SDF/EMF	Environment	Comments noted and needed corrections have been amended accordingly. Additional responses to comments have been captured and sent to line department in response.
17E	In depth comments and various corrections proposed relating to overall documents received. Especially related to: 1) Proposed amendments and additions to definitions; 2) Overall comments relating to refinement of terms used relating to critical natural assets and environment	SDF/EMF	Environment	Comments noted and needed corrections have been amended accordingly. Additional responses to comments have been captured and sent to line department in response.
18A	Paragraphs 1-31 relate to a description of the sporting, social and heritage values of the current use of the King David Mowbray Golf Course.	Golf Clubs	Structuring Open Space/ NDA	The City has no dispute with the statements regarding the heritage values of the King David Mowbray Golf Course (referred to going forward as KDMGC) or of the value of sports, recreation and golf as outlined in the comment. Further the City agrees that the green infrastructure advantages of the site and the need to retain mature trees are relevant, this is recognised in the draft Table Bay District Plans. All of these characteristics and uses would need to be considered in any future proposals for the site, as would the inputs of residents.
18B	"Notwithstanding sport playing an integral role in the culture of the City's residents who are enthusiastic participants in sports as popular social activities, sport and recreation is de-emphasised in the spatial review."	Golf Clubs	Structuring Open Space/ NDA	Sport is considered in the District plan as a valued use of the structuring open space network and guidelines for these areas are included under the Structuring open space guidelines. Open spaces and their contribution to the social life of the City are acknowledged and the assessment of provision is supported by CSIR research on the provision of social and community facilities. The District plan promotion of multi-functional public open spaces is relevant in the case of investigating intensification of use of the KDMGC site. At this scale of planning details of individual sports uses are not included.
18C	There is adequate land elsewhere in the District.	Golf Clubs	Structuring Open Space/ NDA	Land availability is a challenge for the City as indicated in our land use modelling. Release and sequencing is complex and the City must consider optimising its existing resources for wider public benefit.

18D	Objections to the “scrapping of the golf course” and the statements in the sub-district guidelines.	Golf Clubs	Structuring Open Space/ NDA	Through the District Plan public participation process, we have received comments both in favour of retaining the golfing use and those in favour of introducing different uses. The proposal in the District plan at this point in time is therefore only that we investigate the sites potential. The Spatial Planning and Land Use Management Act 2013 requires us to consider spatial efficiency and from this stems the mandate to investigate how to optimise well located and large public land holdings, a position that we believe is prudent given the site is known to have potential to address a number of the City's service delivery mandates or to generate more revenue to do the same. Our first duty and mandate as public servants is to the progressive realisation of the Constitution and we must consider how state assets, including the site in question can be used to advance this goal. The only proposal at this stage is for further investigations.
18E	Social and economic impacts on the Pinelands community.	Golf Clubs	Structuring Open Space/ NDA	Should investigations progress further there will be future opportunities for engagement with the wider public, surrounding residents and the KDMGC.
18F	Comments suggesting it is not feasible to connect with Rondebosch Golf Course and reduce land use of Golf in the area.	Golf Clubs	Structuring Open Space/ NDA	We understand that a reduction in space may have an impact on the way the sport is practiced currently. While we acknowledge that finding ways to integrate Rondebosch and Mowbray may seem less desirable at this point in time, given the demands on public land and considering the social and economic value of golf and its importance to the sporting community as stated in this representation, we would hope a business case to connect the courses may be considered as part of future planning investigations.
18G	Mowbray Golf Course should be a destination place.	Golf Clubs	Structuring Open Space/ NDA	Destination places are identified as providing broad public access and year round tourist and visitor activity. The Golf and sports uses are either intermittent or exclusive. The site is identified as part of the green infrastructure network.
18H	Mowbray Golf Course should be a protected and conserved area in the biodiversity network.	Golf Clubs	Structuring Open Space/ NDA	Protected areas in the document refer to areas proclaimed for protection under the National Environment Protected Areas Act 2003.
18I	Comments that proposals will reduce rates income.	Golf Clubs	Structuring Open Space/ NDA	Our evidence shows that the introduction of housing into Sporting precincts increases rates income. The City's existing Atlantic Beach golf estate with a housing component generates more rates and revenue than those Golf facilities with no housing, thereby improving the contribution of this facilities to service delivery.

18J	Object to investigating housing as a potential use of the site and statements that a social housing component will make the site unusable for sports.	Golf Clubs	Structuring Open Space/ NDA	Multi-functional uses surrounding golf facilities are both possible and can be mutually beneficial for the sporting community. As a case, the Metropolitan golf course and Green Point Park have an inarguably positive contribution to the City and are in close proximity to dense housing, retail and hospitality developments. Again housing development is only one of the uses that the District plan proposes is investigated and will be conditional of consideration of the context. Social or affordable housing is suggested as a component of this and can be designed to be indistinguishable from other housing.
18K	"King David Mowbray Golf Club's submissions are that the draft spatial review should be amended to specify that its property leased from CCT and utilised for sporting purposes be further developed as a sports hub."	Golf Clubs	Structuring Open Space/ NDA	Maintenance of sporting and recreational uses on parts of the site will be given due consideration in future investigations. We have common ground with the Golf course tenants on the potential and desirability of creating more public benefit from the site and support future engagements on how this can be achieved.

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

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB1.1	Sub-Districts	Housing	Need to prioritise affordable and social housing at the sub-district level and include additional new development areas in sub-district 1. Include development guidelines that encourage and promote the development of social housing in all of the other sub-districts. Camps Bay Bowling Club and Glen Country Club- Heritage Square, Harrington Square and Buitengracht Corridor, Newmarket street, Green Point Bowling Green, Tafelberg, Rocklands and others. Maximise public good for public land through prioritising social and affordable housing. Approve and align inclusionary housing policy	The motivation from NU is considered as is the result of the Tafelberg judgement, the Green Point Bowling Club and Tafelberg sites are included in the revised draft for Sub-District 1. Glen Beach Country club is seaward of the coastal urban edge line and has been subject to heritage and environmental objections which resulted in the call to bid for development being recalled. There is a challenge of meeting future demand for school space in Sea Point, this should be considered in the determination of what the best public good is for publically owned sites in Sub-District 1.
TB1.2.	Implementation	Gentrification	Lack of mechanisms to combat gentrification, the measures address the effects of gentrification not the avoidance of gentrification. Measures could include rent control and using special zones in terms of SPLUMA to develop crafted rules for development and land use in specific areas under threat of gentrification. Measures should guard against evictions and displacement. Include spatial alignment of inclusionary housing overlay zones.	The City's inclusionary housing policy is the mechanism for ensuring future affordability in well located areas.
TB 1.3		New Development Areas	Align new development areas with MSDF.	These documents will be aligned prior to the publication of the 2022 MSDF.
TB 1.4	Process		When MSDF is released for public comment should be additional chance to make comment on the District Plans	District Plans will be released for written comment together with the revised MSDF.
TB 1.5	Vision		Supportive of vision and strategic direction including infill and unlocking under-utilised public land for public good and affordable and inclusionary housing.	
TB 2.1		Housing	Supportive of identification of golf courses. Request for urgent action. Request Tafelberg, Green Point Bowling greens and Rocklands Villa included. Lack of detail on type of housing programmes	Type of housing programmes intentionally left out of a plan at this scale to allow flexibility at the programme scale. Further engagement on finer details will be made available through other City processes e.g. rezoning and precinct planning.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 2.2	Implementation	Gentrification	Should look at stumbling blocks to implementation e.g. gentrification and political will	See response to 1.2.
TB 2.3		Housing	In the Human Settlement Strategy the City says that it will focus on co-design and community-led processes. The RTC occupations of Helen Bowden nurses home (Ahmed Kathrada House), 104 Darling Street (Irene Grootboom House), Vredehoek, Erf 81 and the old Woodstock Hospital (Cissie Gool House) should be supported and co-designed with the existing occupiers for the purposes of affordable housing. The District Plan should make clear that the public land and buildings of these existing occupations should be prioritised for collaborative co-design to support the community-led solution to the housing crisis that these occupations provide.	The City is limited in initiated co-design processes on land we don't own. Legal processes regarding City owned sites will be followed.
TB 2.4	Implementation	Monitoring and Evaluation	In 2017, 11 sites in Woodstock, Salt River and the inner-city were promised and earmarked by the City for affordable housing. To date only one of the sites (Pickwick Transitional Housing) has been developed. The District Plan does not do anything to make sure that these projects are urgently realised. This also makes us worried about the ability of the district plans to translate new commitments for affordable housing into action.	The District Plan sets out an intention and doesn't give rights, the ability to turn this into action is confounded by a range of factors. Monitoring and evaluation should allow us to better reflect on the role of different factors in turning intention into reality going forward
TB 2.5	Implementation	Gentrification	Without rents, rates, levies and taxes being controlled, major increases in costs make things unaffordable for us and people like us over time. This results in more evictions and displacement as people can no longer afford to live in areas where they have been staying, where their kids go to school, where they work, where their family and life is.	See response to 1.2. Need to develop City position on priorities related to gentrification
TB 2.6		Housing	We have travelled around the world on knowledge exchange trips with many different successful land and housing social movements, including La Pah in Barcelona and MTST in Brazil. What we have learnt from these experiences is that in many places around the world, there are different community-led alternatives for dignified affordable housing which can be supported by the state. We don't see any of these alternatives in the District Plan.	Human settlement policy or strategy will be the place for these alternatives. However some of these can't be considered outside a broader housing implementation reform in the country.
TB 2.7	Implementation	Housing/Land Release	Land should be released for PHP	Beyond scope of District Plan, forwarded to Human Settlements Department

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 2.8		Housing	Too little protection has been afforded to those who – against every historic hurdle – have managed to hold onto housing in well-located areas around the inner city.	Beyond scope of District Plan to address occupants of public sites, need to be dealt with consistently in terms of site circumstances and policy and legal framework that exists.
TB 2.9	Process		The public participation and consultation process around this important plan was not sufficient. The complexity and technicalities in the plan were not explained to poorer communities and affected and impacted communities. Again this is a plan FOR the people WITHOUT the people. At the heart of the district plans is the exclusion of poor and working-class people of colour by not meaningfully including us in the process.	Full engagement process can be reviewed online. There was engagement on the Baseline document for 60 days, engagements with ward Councillors and engagement on the technical documents for 60 days.
TB 3.1	sub-district 1	housing	Interventions need to address the distortions created by apartheid planning. Allowance for affordable housing in the	See revised Sub-District 1 new development areas
TB 3.2	sub-district 1	densification	The rapid densification seen in these areas over the past decade, however, is threatening both these areas' character while making mockery of any stated intentions of advancing inclusivity or redressing past injustices. Not only do current densification policies fail to advance Constitutional and Legal objectives (as set out in SPLUMA), at times they've exacted significant costs from existing residents or owners (see figures 1 and 2). Unless these costs contribute to advancing redress, their cost to both individuals and community relations simply cannot be justified.	Noted, inclusionary housing policy (draft) advancement and monitoring may assist in ensuring future growth meets inclusivity goals.
TB 3.3.		housing, homelessness	we would like to see inclusive development advanced in our neighborhoods through i) incentivising affordable housing in developments on private land; ii) Development of social housing on publicly owned land; and iii) Introduction of measures to support the Atlantic Seaboard's unhoused residents including: Provision of emergency shelter and/or transitional shelter. Engage with local organisations. Provision of locker facilities, social welfare services, 24 hour public ablution facilities.	Inclusionary housing policy (draft) and City's Human Settlement Strategy should support these requests, comment forwarded to these departments. Comment goes into detail that is best placed in these policies. Publically owned sites to be considered. See response in 2.8 related to occupants of Helen Bowden. Homeless facilities comment forwarded to community facilities department.
TB 3.4	Implementation	Gentrification	No discussion on impact of airbnb and absentee landlords. No comprehensive policy on gentrification	See Response to 1.2 referencing inclusionary housing policy.
TB 3.5	Process	Public Engagement	As a body mandated to realising the vision of the country's Constitution, it is the work of the City Council to demonstrate responsible political leadership by building collective understanding of why this transformation is not only necessary for the city's sustainability, but also beneficial to all her residents. SPFA would be happy to partner with the city on this task.	The Spatial Planning and Environment department is undertaking an empowerment process to improve understanding of the mandate of spatial planning. Civil society and SPFA are welcome as partners in this task.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 3.6	EMF	Environment	Sewage should be treated before discharge to the Sea	The engineering departments responsible have sector plans that outline the City's priorities and responses regarding sanitation infrastructure. In the long term, treatment at Green Point outfall is <u>being considered to align with future growth.</u>
TB 3.7		Environment	Densification and intensification must be sensitive to environmental considerations. Future building regulations must ensure that new builds provide for rainwater harvesting and greywater use.	The Building Development Management department is undertaking work in this space- sustainable building practices are generally supported in spatial planning.
TB 3.8		Environment	Space provision for food gardens and composting.	City parks and facilities management manage requests to use space within existing facilities for community gardening.
TB 3.9	Heritage	Heritage interfaces	Densification must be sensitive to existing built environment	
TB 3.10		Heritage, Memorialisation	In 2014, The Tramway Road Community Trust sold its land in Tramway Road to Spear Property Trust and a new development was built. Evidence of these forced removals, which took place between 1959 and 1961, was effectively destroyed. We want to encourage CoCT to look at ways to honour communities that were displaced by the Group Areas Act and to commemorate the proud history of the people who once lived here.	Positive suggestion- Comment forwarded to heritage colleagues
TB 3.11	Process	Public Engagement	Request more clear and accessible formats. Encourage future engagements. Emphasis on constitutional mandate and responsibility to support the most vulnerable.	Summary material and explainers on key concepts is being developed to support final publication.
TB 4.1	EMF		Include various statements from Southern District SDF in the Table Bay SDF Refer to surrounding statutory Marine Protected Areas Emphasis role of TMNP as area of biodiversity significance	All suggestions will be incorporated
TB 4.2	Implementation	Risk	Remove and control alien vegetation along urban interface as part of fire management. An additional priority regarding fire risk that needs to be noted, as exemplified by destructive effect of the 2021 Devil's Peak and the 2019 Kloof Nek fires, is the role of mature, exotic / invasive trees on the urban edge such as the stands of highly flammable pine, gum and other alien invasive vegetation on public and private land which exacerbate the natural fynbos veld fires and result in the destruction of urban infrastructure. (pg. 24)	Role of invasive vegetation control will be emphasised in the baseline Risk chapter. The mapping challenge has been forwarded to the relevant departments.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 4.3		Urban Edge	Nature and role of 'development edges' and 'urban edge' needs to be clarified. The notion of development edges versus the existing Urban Edge needs to be unpacked and detailed in the Table Bay SDF.	Development edges are a reintroduction of previous policy, detailed guidelines are still being outlined in conjunction with the MSDF review 2022.
TB 4.4	EMF	Protected Areas	Figure 11 Biodiversity, GIN and open other open spaces, Conservation and biodiversity priority zone, Protected and conserved areas, Core 1 5. Development to be in accordance with the relevant protected area/ reserve management plan. (pg. 51)	The inclusion of this statement is supported in the instance that reserve management plans generally comply with environmental management guidelines.
TB 4.5	EMF	Heritage categorisation	Culture and heritage zone – World Heritage Sites - Table Mountain (Pg. 53) TMNP is a component of the Cape Floral Region Protected Areas World Heritage Site (WHS) and is a Natural WHS in terms of UNESCO's criteria for Outstanding Universal Value (OUV) criteria (ix) and (x). As such, the TMNP's WHS status is not one of cultural heritage.	review naming of cultural heritage zone to reflect nuances within the category.
TB 4.6	sub-district 1	Oudekraal	Clarify status of Oudekraal properties	Oudekraal properties are CBA and remain unprotected while under private ownership. Development will not be considered consistent with policy and will be subject to EA. Site specific circumstances can be motivated
TB 4.7	Implementation	Fire Map	The map does not adequately indicate the fire risk caused by mature exotic / invasive trees along the urban edge such as the stands of highly flammable pine, gum and other alien invasive vegetation on both public and private land.	Coordinated update of fire lines with MSDF is supported
TB 4.8	Implementation	Local Area Planning Priorities	Table 7 Local Area Planning Priorities The TMNP development priorities as presented in the approved Park Management Plan (PMP) and Conservation Development Framework (CDF) could usefully be referred to in this section of the report.	Destination place enhancement is a motivation for prioritisation of development, National parks projects are captured in this category.
TB 5.1	Sub-District 3 SDF	Gentrification	New developments are micro-apartments- favour students and transitory rental accommodation e.g. airbnb. Developments don't address housing backlog and need for family friendly accommodation. Push up prices and risk perpetuating apartheid planning by forcing out local people. UDZ incentive not for public good in this case.	See response 1.2

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 5.2		Inclusionary housing	Waste of resources to give away additional rights without requiring inclusionary housing on site or in the area. Need to be tenure blind. Without immediate inclusionary housing requirements for all developments and human scale thinking for the size and design, WRA will oppose densification and intensification.	Inclusionary housing policy and City's Human Settlement Strategy should support these requests comment forwarded to these departments.
TB 5.3		Parks	Add and upgrade open public space not diminish or rationalise them. Engage with community to manage existing spaces so they can be properly used. 2600 objections to any development of parks especially Queens Park and Victoria. Opportunity for employment activities at public open spaces.	Woodstock parks will not be considered for new development, more detail to be included in public space guidelines
TB 5.4		Green corridors	Access to Woodstock Beach and Mountain to be restored. Need for more public open space in association with density. WRA has long term "green necklace" plan for Woodstock.	Transnet land future planning presents a barrier, long term vision can however be supported.
TB 5.5		Heritage Interfaces	Encouraging sensitive interfaces with heritage buildings is not a strong enough statement- vision should be "protecting and enhancing heritage" where it interfaces with development	Suggestion supported
TB 5.6		NMT	Indicate where connections and enhancements of NMT will be made	
TB 5.7		Freight	Need alternative access to container terminal and VRC other than Albert Rd and Church Street ramp- constraint to economic development on this stretch of road	This is on the priority list of projects- Church street interchange will change circulation in and out of port. Local perspective is useful and will be forwarded to department working on these plans.
TB 5.7		Parking	Parking challenge- public transport not sufficient to decrease demand for car ownership.	PT Zones currently undergoing review- broader City challenge and comments will be forwarded to other departments, however a carbon neutral forward thinking approach is necessary in spatial planning.
TB 5.8		Process	Further engagements needed. Platform challenges have left i&AP's unable to participate.	Noted and platform challenges communicated with relevant departments
TB 6.1		NMT	Clear NMT/Cycling planning attracts business development, supports education and community facilities, low carbon/carbon neutrality	Map scale is too large to usefully depict NMT. Importance of NMT is captured in the transport categories, sub-district guidelines and in the implementation chapter.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 6.2	SDF	Civic Nodes	Request indication of linear, community based street spaces as part of Civic nodes. Can pave the way for future pedestrianisation E.g. Hanover Street, District 6 Lower Main Road, Observatory Long Street, Cape Town CBD King Langalibalele Street, Langa Request linear community spaces recognised in the District Planning process. Indicate Civic Heart in Observatory	District Plan scales not conducive to indicate smaller linear activity/civic spaces. However these have been noted in sub-district guidelines. Civic node in Observatory moved to a more central location on Sub-District 3 Map.
TB 6.3		Process	Request that community spaces identified in District Plan set precedent for a follow up participatory exercise. Allowances for street spaces to be transformed into public spaces where the need arises can be further mapped.	Constructive suggestion beyond the scope of District Plan exercise, encourage community members to approach ward councillors as follow up.
TB 7.1	SDF	Heritage Interfaces	What does a positive interface look like spatially? How will it be determined and by whom? Residents vs developers? How will developers determine that prior to development? Does this mean that heritage site legislation will not be considered? Any design on a heritage site needs to be a compromise and the design should pay tribute in some way to previous structures. We would like that aspects of the complexion of our community is preserved	Future work on the heritage specific provisions is ongoing and includes architectural guidelines. The Urban Design Policy review is further underway and the Heritage and Urban Design departments comment on development applications. The public are also encouraged to engage on the how they think a development might fit better in their neighbourhoods.
TB 7.2	sub-district 4	Infrastructure Capacity for Densification	Our concern is that the current trend is for high density residential development in the greater area, and this is happening without ensuring commensurate upgrades to infrastructure with respect to roads, water and sanitation. We are experiencing significant traffic congestion and overloaded sewerage systems. Request assessment of existing capacity.	Assessments of capacity and impacts of new development are contained in the relevant departmental sector plans. Salt River area does have capacity constraints. Addressing these challenges are to be factored into Development Contributions of new developments and infrastructure master planning. The implementation chapter notes this.
TB 7.3	sub-district 4	Density	Concern about the impact of high density along VRC- provide analysis which indicates 14 storey buildings would be necessary to meet the density in some blocks. Guidelines do not describe in sufficient detail how goals will look spatially in language that residents can understand. Would like to see examples and precedents.	The City's densification policy has reference- blanket high densities are not the goal. Urban design policy and Tall buildings policy further support to ensure a pleasant urban environment.
TB 7.4	sub-district 4	NMT	Voortrekker Road. It can be made more pedestrian and cycle friendly and safe, making pedestrians/cyclists feel more at ease with high volume traffic passing by. Spatial strategies can be used that both make the pedestrian feel safer and slow down traffic	This has been emphasised in the guidelines for sub-district 4.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 7.5	sub-district 4	NDA	Support development of Wingfield to address anti-social activities and dumping. City has not taken the lead in taking this forward.	Wingfield is National government owned and managed by Public Works department. City has limited scope to take the lead. District plan aims to encourage further action on the redevelopment of this site.
TB 7.6	sub-district 4	NDA	few pockets of vacant land in the Kensington/Factetron areas. New developments have little consideration for surrounding residents. E.g. Tenth on Square block on Nyman street. Vacant land should be used as green space	Further engagement on the role and potential of remaining vacant land in the area recommended through alternative processes, for example the Kensington VPUU. Consideration of need for green space supported.
TB 7.7	sub-district 4	Parks	Retention of open spaces welcomed	see 7.6
TB 7.8	sub-district 4		What will the civic node at Wingfield look like and what will the future development be?	The District plan sets the intention and it is beyond the scope to detail the type and nature of development. However the intention would be for a mixed use development in a similar model to Conradie and the civic features would need to include a basket of facilities relative to the population increase e.g. clinic, early childhood development facilities and schools.
TB 8.1	sub-district 3	Process	Obs Civic and TRUPA request more time to engage with contradictions and gaps within the plan	Noted a second 60 day engagement opportunity is available
TB 8.2	EMF	TRUP	Plan makes no reference to the three heritage applications in process with regard to the Two Rivers Urban Park. It is absurd to think of planning for an area that may be a UNESCO heritage site.	It is beyond the scope of the District plan to refer to other regulatory processes applicable to a site- the heritage value of the area is noted in the plan. It is imperative that we plan for the future development of public land in well located areas of the City.
TB 8.3	Concept	Spatial Justice	Technical report makes only ONE mention of spatial justice	Attention has been given to ensuring the commitment to spatial justice is more clear. Spatial planning values and imperatives are contained in SPLUMA and are outlined in the Concept section of the document. A more inclusive city and a change from the apartheid spatial planning legacy is referred to throughout the document and the guidelines stem from these values.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 8.4	SDF	Spatial Transformation Areas	The concept of the Urban Inner Core is described in the plan but appears to be assumed to be homogenous in its application which is not the case – while investment is encouraged within the Urban Inner Core, any development in those areas must be consistent with other policies.	The guidelines (Chapter 4) section of the plan outlines in intricate detail all the considerations that must be taken within the Urban inner core and other spatial transformation areas. Planning must consider the integration and trade offs of sector plans when accommodating growth and development.
TB 8.5	Concept	vision	The District Spatial Vision is elaborated with an emphasis on technical criteria that are easily measurable. For example, it appears that the “needs” imagined in the Vision statement are material needs (transit, economic opportunities, real estate) whereas the questions of identity and belonging are invisible in this vision. It is not clear to us how the consultation process happened, nor led to this statement since it is heavily slanted to the technical requirements of municipal law. It does not mention spatial justice, restorative justice nor peace building, for example, all elements that one might expect to see in a City committed to redress and inclusivity.	The vision is a draft however it is necessarily informed by the future spatial needs of the City. These are quantified in the baseline report, which was widely consulted. Moreover it is a spatial vision, whereas questions of identity and belonging can be addressed in the IDP. The vision addresses the need for the district to be a “home for more people, provide more opportunities to more people” which covers inclusion aspects. The vision is simplified and amended in the revised draft.
TB 8.6	SDF	Gentrification	We agree that areas such as Langa, Kensington and Facreton are parts of the district requiring special investment as part of a commitment to equity. Such investment needs to avoid the problems associated with gentrification that have plagued investments in the Salt River and Woodstock areas. It is unclear what “proactive measures to avoid gentrification” (Para 4.1.1.1 c page 29) will be included in the district plan when it appears to provide no tools for such measures.	See response to 1.2 regarding gentrification
TB 8.7	SDF	New Development Areas	The Plan proposes as a general principle, the prioritisation of brownfield developments over greenfield developments for good reasons. However, the general principle is not carried through in the rest of the plan, since, for example, a focus is made on TRUP (a greenfield site) as a Strategic development site for mix-use development whereas the plan made no mention of the Ndabeni land owned by the City (brownfield) as a Strategic development site. This is one of a number of inconsistencies in the plan.	There is a need for over 500000 housing opportunities in the City- brownfields opportunities are a big part of this- however greenfield, publically owned land is critical in addressing this goal, therefore parts of TRUP must be a focus, the Maitland abattoir site is referred to, which is within of Ndabeni, in sub-district 3 this is NDA 10.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 8.8		Homelessness	providing better protections for people living on the street is also an important social justice goals but not the same as incremental housing development. Recognising heritage and cultural identity linked to the indigenous Khoi people is also a social justice goal but not cited in the plan. We think a much more expansive recognition of how social justice, spatial justice and equity is required in this plan. It is not just about providing more houses for poor people, important as that objective is.	While greater consideration is being given to the space requirements to address homelessness. Not all issues can be addressed in a spatial plan at this scale. The plan must also address the "how" recognising cultural identity is not something that can be objectively linked to a spatial goal as different people have different ideas of what this means. The City has engaged extensively with public comments on the TRUP area and will continue to provide opportunity as and when development proposals affecting the areas emerge.
TB 8.9	sub-district 3	TRUP	The Two Rivers Urban Park is mentioned in multiple places throughout the plan as it should be since it is a key feature of the urban landscape for the district. However, it is evident that the Plan is (a) not consistent in how it treats the TRUP; (b) incomplete in the informants needed to plan for any development; (c) does not take into account any of the previous planning processes undertaken through the City for the TRUP. We therefore believe the plan needs a lot more consultation to ensure a coherent and credible framework for how the TRUP is dealt with in the plan.	Previous planning for TRUP did not take into account land ownership or the need to accommodate more growth within the City as a result of dwindling land resources and the need to contract the urban edge to keep the City financially sustainable. These and other informants are contained in the baseline document and technical report. The recent planning for TRUP as well as comments have been considered, it is not the City's duty to agree with these comments. The plans provided by the TRUPA have been considered and elements considered consistent with the City's future vision are included.
TB 8.10	Heritage	TRUP	There is a Provincial and a National Heritage grading process underway for the TRUP, which is not mentioned in the plan. Any development in the TRUP (such as articulated in para 4.1.1.6 as "Two Rivers precinct will need attention to determine current capacity and future demand for public facilities and green open spaces. These facilities will need to be optimised to take account of land scarcity" and "ensuring multi-functional high-quality spaces provided amenity where densities are continuing to increase.") cannot proceed from scratch as if there is no heritage grading involved in the area. The area is also slated for nomination as a UNESCO Heritage Site and for inclusion in the Presidential Heritage project, the Khoisan National Liberation Trail.	New informants can be included in updated baseline report-heritage must be balanced with forward planning considerations in terms of SPLUMA.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 8.11	Destination Places	TRUP	in the 2012 district plan, the TRUP was included as an urban destination, but is now removed from being listed as such (see, for example, Figure 9 where the TRUP is no longer evident and Table 9 where TRUP is not mentioned as an Urban destination place).	This has been reinstated.
TB 8.12	sub-district 3	TRUP	no mention is made in the Plan of the City's co-design process which generated a Manifesto for TRUP which framed how development might be suitably accommodated given the importance of green infrastructure.	This plan has been considered in the update of the Two Rivers LSDF and aspects consistent with City policy have been retained.
TB 8.13	sub-district 3	TRUP	fails to recognise the TRUP as having a significant footprint within a Conservation and Biodiversity priority zone and much of the Black and Liesbeek River Corridors as Ecological support areas as outlined in Table 2 of the Technical Report.	Biodiversity areas are included in the plan. The balance and trade offs between these considerations is a necessary part of planning decision making. These include the trade offs between supporting dense, transit oriented growth and the cost of sprawl.
TB 8.14	Environment	TRUP	In that regard, a study by Delft University researchers specifically examined how the Liesbeek River to the West of the River Club can be exactly rehabilitated to improve ecological functioning and recreational opportunities. Our submissions of this report in the River Club EA process and the appeals against the EA and the site's rezoning appear to have been completely ignored by the planners, so we are submitting this to the District Plan process to point out how, given the importance of rehabilitating natural rivers, it makes no sense to infill a river.	The plan must consider the decision making process of the City, which decision makers consider to have adequately addressed the rehabilitation of the river course as a condition of development.
TB 8.15	Heritage	Cultural Landscapes	In general, the Plan appears to limit heritage to mostly tangible heritage. For example, the connections between river and mountain are mentioned but not the importance of open space visual connection to the mountains which are an important aspect of the TRUP environment.	Maintaining visual connections to the mountain through open space corridors has emphasis in the guidelines.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 8.16	SDF	Conflicts	The Plan does not give adequate guidance as to how to resolve conflicts between completing principles. For example, Para 4.2.2.1, in encouraging a more compact for of development, make the point that green infrastructure that supports climate resilience and provides ecosystems goods and services should not be compromised by development but in the same section, also argues that higher residential densities should be promoted.	These two principles are not necessarily in conflict, development examples from around the world show good practices in the integration and mutually reinforcing properties of urban and green infrastructure and urban and heritage. The plan cannot resolve all conflicts and decision makers have to give consideration to the balance and trade offs between these principles when they are applied to applications.
TB 8.17	EMF	Wetlands	We are puzzled somewhat about Table 2 which lists only the Salt and Black Rivers as associated with wetlands. Since the Liesbeek and Black Rivers are intimately connected and the 2012 Planning regarded their maintenance as co-dependent, we are surprised it is not part of the Environmental Management guidelines for River Wetlands and their associated buffers.	Noted, Liesbeek will be included.
TB 8.18	SDF	Transport	With reference to the Berkeley Road extension contained in the plan, we wish to draw the City's attention to the fact that the confluence of the Black and Liesbeek Rivers, which is in close proximity to the likely extension is a site of high heritage importance for the Khoi.	Comment to be forwarded to transport colleagues. Berkeley road seen as a vital link from an economic and emergency services point of view and further improves opportunity for interaction between communities divided by apartheid. Heritage is an still an important consideration and can be noted in the areas of the report that mention Berkeley rd. and considered in future development.
TB 8.19	SDF	NMT	NMT system is not safe or reliable for cyclists to use in the City.	Noted, the plan is forward looking and promotes the transition to a safer transit network
TB 8.20	Economy	Informal trade	we note the proposal for home occupation and micro-enterprise promotion along Lower Main Rd in Observatory. The Civic would welcome such support from the City to build small businesses as it would support for informal traders (page 75). We would like to engage the City and get support from the City to do so.	This is an urban management issue for consideration by the economic development department and ward and sub-council committees.
TB 8.21	Heritage	interface	In our experience, there have been multiple approvals of developments by the city that have harmed the historic fabric and residential character principally because of the discretion given to planning officials when balancing different policies - the HPOZ appears to have no teeth in this regard - this is a serious problem unrecognised in the District Plan. It is important that if a quality built environment is intended, then the HPOZ and the heritage inputs of City officials needs to be given greater emphasis.	Heritage specific provisions and Urban Design policy reviews are underway to assist with this challenge.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 8.22	SDF	TOD	Further, with respect to supporting medium-risk and medium to high residential densities in relation to transit oriented development page 119), we can agree that it is sensible. But we have not seen such densities being supported along major transport corridor but large building inserted well into the heart of Observatory with no obvious attention to these criteria.	Observatory is a transport accessible area, opportunities for contributions to more housing or economic opportunities must be considered here as well as all other well located areas of the City.
TB 8.23	Implementation		There are various strategies proposed to 'persuade' private developers to contribute to public goals. While in principle this is an important objective, we have some concerns about the feasibility and appropriateness of some of these strategies related to including SMME's and inclusive housing.	Inclusionary housing policy at Province and City level (draft) as well as the various incentive mechanisms seek to address this challenge.
TB 8.24	Implementation	Housing	On page 40 of the Implementation Plan, it is suggested that developers should be subsidised through awarding developers additional rights in the form increased height and bulk. This is, in essence a subsidy of private developers to comply with a policy and it is local communities who are being asked to pay for that. If there is a policy on inclusive housing, then all developers should face an obligation to meet the requirements. We disagree fundamentally that affordable housing can only be created by allowing developers to build bigger and denser. That will damage the fabric of the urban context. Rather, the playing field for developers should be determined by policy and it should a level playing field for all developer to understand that to profit from the developments requires a business model which either yields lower profits or which they pass on to buyers who can afford higher rentals or purchases. It is unacceptable that the price of such incentives is passed on to neighbouring communities.	An inclusionary housing policy (draft) should address some of these concerns. Other considerations such as character and urban design will need to come into play.
TB 8.25			the idea that the plan should enhance the identity of Observatory as a local civic precinct and support community service provision in the Malta Park area. We do not disagree with these ideas but we believe very strongly that this should happen via a participative co-design process in which the City and local stakeholders are able to jointly develop a precinct plan for the Malta Park and Hartleyvale areas. City should commit to a co-design process relating to Malta park	Will be forwarded to relevant departments- facilities management, community services for consideration.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 8.26	Implementation	Heritage	We do not agree with the strategy of permitting heritage exemption areas (page 40 of the Implementation Plan) unless it is limited to new development areas only, otherwise, discretion of the part of planners will creep in and allows waivers in areas that are not appropriate.	Heritage exemptions allow faster service delivery in areas where this is needed and will be pursued with the necessary processes in place and with the partnership of the heritage authorities. This is a complex process and only being used where buildings are going over the 60 year limit in areas with less heritage character, it will not apply for other regulations.
TB 8.27	Implementation	environment	Similarly, we do not understand how exclusions from a National Act, NEMA, can be permitted by planning processes at a District level. We therefore do not support this exclusion (page 41) not think it wise or legally permissible.	The SDF EMF will be adopted as an environmental management instrument in terms of NEMA. The only exclusion area will be Atlantis, it follows a complex legal process in which an agreed environmental management plan becomes the new planning instrument.
TB 8.28	Implementation	Income generation	We also are worried that some of income generation strategies will work against the idea of an inclusive City. The idea on page 41 that landowners might pool land and contribute a portion of land to sell to fund public infrastructure seems to be a recipe for the rich (who own land) to preferentially buy services from the City. That can only be a recipe for reinforcing inequality in an already highly unequal City. It seems entirely contrary to the Vision proposed for an inclusive and more equitable society.	The intention of this would be to leverage development that can contribute to infrastructure for the wider public benefit.
TB 8.29	Implementation	Red-tape reduction	We are also concerned that a "streamlined land use application process for priority areas" (page 42) may lead to short cuts on public participation and on statutory processes and would only support this if the plan made clear that all such processes would not escape normal processes under law for public participation, as prescribed in the Municipal Service Act. There is nothing wrong with trying to speed up or make more efficient administrative processes but these should not come at the expense of due process.	Noted, the City has to follow all legal obligations regarding public participation.
TB 8.30	sub-district 3	New Development Areas	deals with new developments and strategic sites. We are puzzled as to why Ndabeni, which is a site where the City owns substantial tracts of land, and which the 2019 TR LSDP cited as a possible development area, is not listed as a Strategic Site in the plan. It is located potentially close to a rail link and it not far from the Voortrekker Rd development corridor. So it is missed opportunity and we wonder why it has been omitted from the Plan.	It is NDA 10- Maitland Abattoir site and surrounds

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 8.31	Implementation	Food Systems	The Implementation Plan refers in paragraph 1.5.1.3B to promoting resilient food systems. We did not see any clear and structured plan for promoting urban food gardens in the district. Given high level of food insecurity generally, aggravated by the COVID-19 epidemic, one might have expected to see more explanation of how the plan was going to encourage urban gardening as a food security measure.	Spatial plans at this scale consider larger food production areas, freight, distribution, storage and accessibility of a variety of trading environments which all play a role in food security. Food gardening is an option for many public sites. It can be a high input cost, in planning, labour, water and materials and while incredibly valuable for communities, in practice plays a small role in urban food security. Facilities management and community services departments can be contacted regarding space for food garden projects.
TB 8.32		Employment	we also would like to see the City supporting income generation for those living in most marginalised circumstances. People who are homeless and who can and are willing to upskills themselves to operate in collectives should be provided with preferential opportunity to bid for City Contract as part of urban maintenance and renewal.	Noted- beyond scope of spatial plans- for attention of urban management and social development.
TB 8.33	Implementation	Policies to be retracted	Until such time as new sub-district/local plans are in place, we do not want to see an absence of any planning framework. Our experience is that bad decisions are when there is discretion left to planning officials to make decision in the absence of clear guidance. There the District Plan should provide for an interim period where the existing plans stand until news plans are in place.	Noted
TB 8.34	sub-district 3	Civic Nodes	we concur with the OBSID submission that the Plan fails to capture the cultural heart and civic attributes of Observatory, even though it proposes in principle to protect the historic fabric and culture of Observatory. We therefore attach Annexure 3 which is a statement of the OCA's vision and mission,	The civic node has been moved as suggested. Further guideline suggestions for the attributes to be retained or enhanced are welcome.
TB 9.1	sub-district 3	Process	Concern about limited time to comment and request extension	Further time for comment during MSDf comment period.
TB 9.2	sub-district 3	TRUP	Supports submission of Obs Civic and TRUP- TRUP inadequately dealt with in terms of Provincial and National heritage grading processes	see response TB 8 and TB 8.10 relating to heritage grading processes

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 10.1	sub-district 3	Process	we believe is valid to continue a broad Co-Design participation process as we insist that Heritage and Environmental Policy is maintained as at Best Practice and that integrates the TRUP with the surrounding Heart of the City area while continuing to insist that each Precinct be engaged with in collaborative and creative ways to attain the best supported outcome for the greatest common benefit as unique Heritage Environment and intensity of valid use.	There will be opportunity to engage on precinct design for future development proposals.
TB 10.2	sub-district 3	Process	difficult not having had any feedback on the HIA and TRLSDF we objected to,	
TB 10.3	sub-district 3	TRUP	We objected to the replacement LSDF for TRUP and Ndabeni (TRLSDF) and the Flawed River Club BAR. Our Appeal against the flawed Environmental Authorisation and our Appeal against the flawed Rezoning Application were serious documents with strong valid arguments that have been disrespected and disregarded.	Refer to the MPT decision and any legal processes related to it.
TB 10.4	sub-district 3	Guidelines	We can't in this context be satisfied by statements such as a commitment to "restore Liesbeek River" and "To protect biodiversity" when that is already in the current LSDF and District Plan yet is being undermined by Authorities and Developers claiming that means filling it in and restoring the Flood Canal instead	A policy deviation was applied for in the case of the River Club- the conditions imposed on the application to invest in river restoration and public park environments were possible because of the earlier policy and these are still relevant objectives, development and green infrastructure are not mutually exclusive, even in environmentally sensitive sites. Would be happy to provide TRUPA with many international examples that have achieved this.
TB 10.5	Heritage	TRUP	It is also a great concern that Heritage Authority such as HWC who have issued clear refusal of a set of overlapping HIA's in TRUP is disregarded, that consultations and objections for updated LSDF and District Plans are simply disregarded and decisions are made as if not yet approved policy has any validity to speak to guide new decisions that should be based on existing policy.	see response TB 8.10
TB 10.6	sub-district 3	TRUP	Objection to a presumed name change	The naming Two Rivers Precinct is a descriptive name, indicative of the broader area and considerations, as the whole area is not a park but a series of different spaces. This has been made clearer in the revised guidelines. It is not a name change.
TB 10.7	sub-district 3	TRUP	TRUPA's River club objections not considered	This matter is sub-judice and beyond the scope of the District Plan. Forward planning does incorporate the decision of the planning authorities as a viable alternative for the site.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 10.8	sub-district 3	Guidelines	Objects to various guidelines including: Rationalise open space system, "Ensure appropriate BUILT FORM and land use to give effect to mixed land use 'INTENSIFICATION', in support of transit-orientated development. River Club is not TOD.	The River Club promotes transit oriented development as it assists with generating activity close to where people live and in increasing residential densities, makes transit provision feasible and further decreases trips out of Observatory by providing a school and workplaces in the proximity. The Transit Oriented Development Strategic Framework may be a helpful framework to review to understand this objective.
TB 10.9	Heritage	TRUP	"Now heritage is being sold down the River for short term greed and madness deceit. Note repeated points in this document that attempt to expunge all protections of this Sacred Urban Park Heritage place! It is irresponsible and despicable bad form."	The heritage status of TRUP is acknowledged in the cultural and heritage resources map and the associated guidelines. The natural protections are further guided in the EMF section of the document.
TB 10.10	sub-district 3	TRUP	How can our City of CT Urban Planners be so destructive to state: a policy for TRUP (a protected Urban Park Natural Destination) as: "Support a shift towards mixed-use intensification" full stop! And: "Promote inclusive land use development."	These guidelines reflect that intensification is promoted on the brownfields areas surrounding the green corridor and not everywhere. Both conservation and development are necessary imperatives to get the maximum public good from the developable portions of the area surrounding TRUP.
TB 10.11	sub-district 3	TRUP	Concern with Berkeley road link.	Refer to MPT decision on River Club application related to Berkeley rd.
TB 10.12	sub-district 3		VRC is a development priority	Noted
TB 10.13	sub-district 3		Upgrade Main rd Observatory	For consideration by transport planning departments
TB 10.14	sub-district 3		redesign proposal for the Station Road - Liesbeek Parkway intersection that converts it to a free-flowing green traffic circle	For consideration by transport planning departments
TB 10.15	sub-district 3		Various transport and traffic management proposals	For consideration by transport planning departments
TB 10.16	sub-district 4	TRUP	Oude Molen is being reviewed to have increased upgrade possibilities that respects its existing qualities and without disturbing its unique historic heritage, nor disturbing its Eco Village character as an early farming place, while preserving its historic iconic views (not building west of the ring road!)	Province is site owner- Future engagement opportunities will be available as part of the precinct plan for this area. The greater public good will be a key consideration.
TB 10.17			Ndabeni and the length of Alexandra Road is seen as a great opportunity for higher density mixed patches of affordable and market apartments and some commercial and light industrial areas, some in lower podium level below office buildings.	Ndabeni is New Development Area 10 in the Sub-District Guidelines

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 10.18			various proposals beyond the scope of the District Plan	
TB 11.1		New Development Areas	plans are misleading: they describe areas marked for New Development (as per SDF Table Bay April 2021 map key) as 'New Urban Infill'. This is intentionally misleading and vague, when there are plans to develop and build as high and as much on these areas. All the plans should clearly state that New Development is planned, and in many cases, approved and commencing. It would be devious of the City to be proposing these areas for	The vast majority of sites are not in an advanced stage of planning and appear here to give transparency on which sites are being considered. Sub-District guidelines provide detail on where development is already taking place. The Public will have future opportunities to engage with other applications and site development plans. The City is clear on the need to densify in well located areas, to provide more opportunities to more people and to support a more efficient and sustainable urban form.
TB 11.2		Process	the plans and development areas are too vast to be properly understood in such a short time, while ordinary people have live engagements and responsibilities. In additions to this, it is absurd that the City thinks that a few 2hr public meetings will educate communities about these huge documents adequately that people can comprehend and comment reasonably when these plans have such huge consequences. Endorse Observatory Civic Association in their request for an extension and more involved pulic participation process.	There will be opportunities to comment on precinct and site development plans.
TB 11.3		TRUP	One cannot possibly be expected to comment on vaguely defined ' New Urban Infill' areas when the SDF does not outline what those developments are. The scale of the development will obliterate any ecological ecosystem or remaining heritage landscape These proposed frameworks are supposed to adhere to the NEMA regulations, yet they clearly show proposed development in environmentally sensitive areas including TRUP.	While the development around TRUP may change the landscape, there is ample opportunity to develop in a way that contributes to retention of ecosystem services and natural areas. Green Point park is an example of how landscaping can contribute to ecosystem services in an urban area with tall buildings. The intention is that - like the river club- developments will be strongly conditioned to contribute to the management of the river course and the open spaces, this will make these open spaces more usable, functional and a destination that offers more opportunities to more people and connects previously disconnected parts of the City. The inclusion of environmental guidelines are therefore a critical part of these conditions.
TB 12.1	New Development Areas	River Club	Document fails to justify the demarcation of the River Club site as a New Development Area	The River Club is included in the plan primarily due to the current planning authority decision on an alternative for the site. While this is sub-judice currently, interested parties can review the environmental authorisation, specialist hydrology report and Municipal Planning Tribunal in this regard.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 12.2	New Development Areas	Cultural Landscapes	It is our opinion that the site should revert to public ownership and that its future usage should be subject to an exploratory process with the bottom line being that such usage should be appropriate to the character and context of the site.	Comments relate to the River Club Site, not District Plan. MPT decision refers
TB 12.3	New Development Areas	Cultural Landscapes	Object due to loss of heritage character: Heritage informants into LSDF haven't been adequately considered that this heritage study is overtly biased towards development. Valley line is a tangible heritage resource.	A green corridor and biodiversity areas have been retained the TRUP area. Future development will be conditioned to interact positively with the green spaces.
TB 13.1			Overall, the cultural heart and civic attributes of Observatory appear forgotten or lost with the significant attention given to integrating new development planned for TRUP and densifying the adjacent nodes of Woodstock and Mowbray/Rondebosch. This has the potential to create an Observatory that is impacted by development all around it, without a clear plan on how those impacts are managed.	Revisions in the sub-district guidelines respond to this.
TB 13.2	Implementation	Urban Management	An implementation plan that recognises urban management, but in our opinion is thin on detail and over-emphasises the importance of CIDs, without recognising that CIDs are only resourced to be "top-up" role-players. In our opinion the City of Cape Town will need to increase its baseline level of basic services to keep up with growth in demand, as growth in population occurs in order for these "top-up" services to remain meaningful and prevent an overall decline in service levels.	The implementation plan has been amended and provides more detail to service needs in the District.
TB 13.3	Implementation	Policies to be retracted	We note that the Observatory Policy Plan is being withdrawn. We recognise that it is an old Plan and many elements of it would need to be updated to reflect the City's current emphasis. However, the LSDF does not go into sufficient detail for Observatory to fully replace the plan, and therefore leaves gaps from a planning and urban-design perspective.	Can remain as a reference document until future planning exercises fill the gaps- but will be subject to higher order plans. It is recommended that ward committees are approached to further this process.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 13.4	Sub-District 3	Transport	clearer hierarchy of mobility for Observatory, and appropriate traffic calming measures to support that hierarchy. b. A specific plan for Station Road, most notably with the impacts of the Berkley Road extension taken into consideration. c. A specific vision and plan for Lower Main Road, which is also considered a linear cultural and civic heart of Observatory, and key economic centre for the community of Observatory (while the LSDF has highlighted the Obs Library as the civic heart of Obs, this shows little understanding of how the cultural life of Obs really occurs. The linear connections and flows from the Community Hall, Train Station, and along Lower Main Road need to be protected). d. An investment plan for existing and new public transport nodes and access. e. NMT plan that focuses on the whole of Observatory (not just TRUP), and includes access to the train station, Lower Main Road, Groote Schuur Hospital, and key public spaces such as the Village Green, Malta Park and Liesbeeck Parkway, the various parks etc.	The scale of planning makes these details challenging to add on maps as we have a consistent approach across the City. Observatory generally is highlighted as an active area and within a metropolitan corridor, which allows a diverse range of land use activities to take place. The details of this comment are incorporated into the sub-district guidelines for the area.
TB 13.5	Sub-District 3	Community Facilities	The Observatory community has been requesting a process to improve the operational and maintenance plans for the Community Hall. We note that the Maitland/Ndabeni area has a focus on "Improve access to public facilities and upgrade the public environment in civic precincts", which includes such a process for the community hall, and request the same for Observatory.	Noted, can be included in reviewed guidelines
TB 13.6	Sub-District 3	Community Facilities	There is no clear plan for the sports precinct around Malta Park and Hartleyvale. This is an important transition space between Observatory & the green space of Liesbeeck parkway, and its use will become under pressure with development of TRUP. These assets need to be protected as community accessible social and sports spaces. Hartleyvale in particular serves a very wide sporting community and should be recognised for that role, while Malta Park has traditionally served a more local community of Observatory and Mowbray.	Facilities management and/or Parks and Recreation can be contacted in this regard- comments forwarded to these departments.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 13.7	Sub-District 3	Community Facilities	The Liesbeeck river-corridor is a key leisure and green asset, as well as community-building asset used for various clean-ups, birding, fitness etc activities. The DSDF should ensure visual and easy physical access to the water's edge, including at Berkeley Road extension, to ensure the continued community value of this asset, as well as from an urban design for physical safety perspective.	Noted, see 8.9
TB 13.8	Sub-District 3	Informal trade	Very little attention is given to informal trade apart from a brief mention of trading along Lower Main Road and Station Road. We would like to request that a future trading plan should cover the whole area, including TRUP.	Appropriate for future detailed planning.
TB 13.9	Sub-District 3	Process	The OBSID would welcome the opportunity to engage in further planning for the area, on the items identified above and in collaboration with our members, the Observatory community at large and key civic partners representing the interests of Observatory.	Further engagement supported.
TB 14.1	New Development Areas	TRUP	Include a more accurate reflection of the development precincts on the River Club site so that "green infrastructure areas" are reflected.	Actioned
TB 14.2	Sub-District 3	Biodiversity	Encourage the City to further investigate the biodiversity value attributed to the land north of the proposed Berkeley Road extension.	Forwarded to biodiversity department
TB 15.1	Sub-District 4	Community Facilities	Thornton should be included in improvements to access to public facilities and upgrade the public environment in civic precincts"	Community facilities planning has a prioritisation method and is the lead department for consideration of future public facilities and upgrades. Ward committees can be approached for upgrades.
TB 15.2	Sub-District 4	Process	More engagement and public friendly detail requested, plans are too vague.	Further engagement opportunity during MSDF comment period.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 16	Sub-District 1	Density	stop the over development in Sea Point, Fresnaye, Bantry Bay and Clifton. I know you want the additional rates, but you are destroying the neighbourhood allowing multi-storey developments deep within residential areas. You are destroying the value of properties and people's quality of life too by blocking views, sunlight and so on.	Comment for Land Use Management and Urban Design
TB 17.1	Sub-District 4	Vision	From our point of view the vision is clear and it is more integrated, but will it speak to social housing and uniform densification in a meaningful way or address the housing / homeless crisis?	Human settlements policy and strategy should support these goals.
TB 17.2	Sub District 4	Process	The PRRA want to, from the start, be part of all the processes that will result in the developments that will affect us and our surrounds.Can a LSDF be done for Pinelands and surrounds? • Kensington is the priority area for a LSDF. • Maitland Garden Village (MGV) is a very small area and so it should be easy to get it done soon. • Pinelands is big and more residents will want to give meaningful input so we need this LSDF • The reality is this is arse about face. The LSDF should be first, (apologies for the terminology)	Pinelands is not an immediate priority- however Oude Molen and Mowbray Golf Course may have requests for engagement in the short-medium term. The implementation plan can be consulted for a list of planning priorities in the next 5 years.
TB 17.3	Sub District 4	Heritage	In light of development proposed around TRUP, should Maitland Garden Village become a Heritage area? '	As a proposed heritage area MGV will get consideration for protection of heritage attributes.
TB 17.4	Sub District 4	New Development Areas	What is planned for the PRASA houses along Railway, development of old abattoir and widening of Berkley rd?	The City is supporting the development of PRASA land- however the City has no control in initiation of projects there. The Ndabeni land and Maitland Abattoir site is New Development Area 10 currently supported for mixed use or non-residential intensification, ideally to support high tech biotechnology industry growth in the area as these businesses are already existing.
TB 17.5	Sub District 4	New Development Areas	Concerned about the development of Mowbray Golf Course, Pinelands Station and mention of low density housing on Julianaveld.	see Mowbray golf course comment. In order for each suburb to contribute to growth management, rationalising of publically owned open spaces was considered. These sites identified are open for discussion and review.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 17.6	Sub District 4	New Development Areas	What is the future of the Epping Fresh Produce Market, Gunners Circle and the Railway line.	Market is a supported use in this area- detail on future beyond scope of the District Plan.
TB 17.7	Sub District 4	Transport	Indicate what is planned regarding cycle, pedestrian, traffic, MyCiti, Rail	Information is in the implementation plan. However as a framework document detailed project level information is not supplied.
TB 17.8	Sub District 4	New Development Areas	• How do we get to the detailed "nuts and bolts" of what is being proposed to actually have a say and give input etc.? • How do we inform our residents and neighbouring communities about what is happening to enable them to give inputs	The District plan is used to inform future decision making on what can happen in a space. It is a guide and framework and can't give the detailed proposals.
TB 17.9	Sub District 4	New Development Areas	• Potential medium density residential development on the Mowbray Golf Course – we need more detail to comment. • Potential medium density residential development on Oude Moulen – we need more detail to comment. • Potential medium density residential development around Pinelands Station – we need more detail to comment. • Potential high density residential development on the Wingfield site – we need more detail to comment. • Mixed use intensification of the Valkenberg, Alexandra Hospital, Riverclub and Conradie areas – we need more detail to comment.	Each of these proposals will give more detail in feasibility, precinct and site planning stages or when land use rights are applied for. Public will have further opportunity to comment. Conradie development currently has detailed plans and is undergoing construction. Public comment can respond to whether or not any development is supported or if the spaces have potential to meet local development need.
TB 18.1	Biodiversity	Oudekraal	1. Erf 2802 Camp's Bay, 2. Portion 4 of Farm 9002 , 3. Portion 5 of Farm 9002 , 4. Portion 6 of Farm 9002, 5. Remainder Farm 9002 1. The broad City environmental bio-net qualification fails to properly identify the detail bio-diversity of the site, and therefore the Baseline Analysis that informs the (SDF) and (EMF) is inadequate for the purpose of designation of the sites.	The commenter may provide alternative information to the biodiversity branch for review. The comment will be forwarded to the biodiversity branch for comment.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 18.2	Heritage	Oudekraal	designating the entire site area as a culture and heritage resource fails to identify the actual heritage resource which is specific to separate and identifiable areas, and illustrates the inadequate base line of the proposed designation.	Heritage designation a response to natural landscape conditions as well as specific heritage assets
TB 19.1	sub-district 3	Parks	object to rezoning of public open spaces for redevelopment	With the exception of the already programmed Woodstock social housing, open spaces in Woodstock and Salt River will be removed from the proposals in the District Plan.
TB 19.2	sub-district 3	Density	object to proposed medium and high density development	Inward growth is essential in for sustainable growth of the City- infrastructure maintenance and upgrades need to follow this.
TB 19.3	sub-district 3	Housing	Proposed housing developments wil have a negative impact on the property values of the area and on safety and security.	Studies show this is not the case. The City has a legal imperative to provide housing for a range of income groups in well located areas.
TB 19.4	sub-district 3	Process	The City's processes to notify residents and rates payers is flawed, with insufficient parties being made aware of the requirements of the SDF and its affects to the area	An additional comment opportunity is being afforded.
TB 19.5	Heritage	Interfaces	The scheme makes allowance for too greater massing and volume of large buildings within the area. This has a negative effect on the heritage status of the neighbourhood and leads to over-development of an otherwise lower scale built	Refer to Urban Design policy review
TB 20.1			Current development along nodes sees far too many over scaled buildings that negatively impact the area, buildings that are driven by a developers requirement for financial success all the while being pushed through planning approval processes by the city's Planning Tribunal or Planning departments. This needs to stop!	see response 19.5
TB 20.2	Heritage	Interfaces	The SDF needs to take the age and heritage of the Woodstock and Salt River areas into consideration, protect what is currently in the built environment of the area, and seriously scrutinise what is to be proposed for the sub-district. Failing to control and to meet the heritage requirements, scale and design ethos of the area, the additional conservation areas proposed for the sub-district will be for nought.	see response 19.5
TB 20.3	SDF	Principles	The SDF at this point in time is VASTLY too PRO development and cannot be supported in its current format.	The SDF indicates where the future growth in land uses the City might locate to maximise the chance of sustainability. It is necessarily development focused.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 20.4	sub-district 3	Density	Woodstock is a densely populated neighbourhood already. There are current buildings that need redevelopment within the neighbourhood, both publicly and privately owned. We would recommend that the City seek to redevelop these sites before seeking develop open land.	Principle supported
TB 20.5	sub-district 3	Parks	The Body is vehemently against the proposal to rezone the following public open spaces for development: 1) Victoria Road Park and fields (all open space opposite the Woodstock Hospital) 2) Queenspark Sports Fields, Play Park and Dog Park (all open space to the top of Queens Park Road / The Avenue) 3)The Old Quarry Park (top of Roodebloem Road)	Open spaces have been removed
TB 20.6	sub-district 3	Housing	Pickwick and Woodstock Hospital Housing supported. However serious consideration and a detailed plan needs to be resolved prior to implementation, given over to the impact on services, traffic, parking, green / external relief spaces and the impact of a "large building" on the current neighbourhood.	Noted, precinct planning or site plans will provide further opportunities for engagement.
TB 20.7	SDF	Process	Public participation process for the SDF has been lacking.	An additional opportunity to engage is being afforded.
TB 21.1	New Development Areas	Golf Courses	Course provides various developmental and life skills programmes. Hosts Cape Peninsula Golf Club and UCT's Golf Club, the club has 1200 members. Subsidizing costs for younger members. Hosts local and premier golf events. King David Golf Club has invested more than 140m in buildings and improvements and has na annual expenditure of 15 million. The operations support 93 families, including 42 caddies.	Noted, future development use is encouraged.
TB 21.2	New Development Areas	Golf Courses	Designation of the site for possible mixed use development places KDM in financial jeopardy. In the interests of the City for the club to remain operational in the medium term.	For attention of council
TB 21.3	New Development Areas	Golf Courses	There is other suitable land that complies with every requirement of the social need- Wingfield, Youngsfield, Culemborg, Ysterplaat.	None of these sites are owned by the City and therefore the City will has less say in the release, sequencing and prioritisation of these sites for development.
TB 21.4	New Development Areas	Golf Courses	Question the timing of adding it to the District Plan- given that other sites such as Athlone Power Station should be developed first and the market feasibility of developing at scale.	The timing and sequencing of this process will be discussed. Contamination on APS site precludes it from future human settlement considerations.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 21.5	New Development Areas	Golf Courses	Other reasons for objecting: The impact on neighbouring residential property values and their respective rates revenue Spatial planning considerations The need for "green lung" spaces throughout the City Increased traffic flows on the already congested surrounding roads The hydrology of the site	Spatial inclusion goals and SPLUMA implementation take precedent. Green Space would need to be a substantial portion of any future development and it is recommended in the guidelines that trees be retained. Feasibility study would provide detail.
TB 22	New Development Areas	Golf Courses	We object to the designation (mixed use) of Mowbray Golf Course as we feel that the King David and Rondebosch golf clubs both present ideal opportunities to create green recreational areas for the surrounding suburbs which include Langa, Pinelands, Thornton, Athlone, and other Cape Flats areas.	A substantial portion of usable green space would be encouraged to be reserved in these areas alongside other goals such as housing.
TB 23.1	New Development Areas	Golf Courses	Access to the area is a challenge and traffic will become unacceptable. There is no IRT in proximity to the site therefore inconsistent with TOD Strategy.	Feasibility studies will consider traffic impacts.
TB 23.2	New Development Areas	Golf Courses	Pinelands heritage -The golf course forms a very important green open space with the larger Pinelands and surrounding area. The development of the golf course as proposed will significantly impact the historical character and landscape of the area.	The City considers heritage and this must be balanced against the need to make efficient use of public assets and use public land for the greater public good.
TB 23.3	New Development Areas	Golf Courses	The general allocation made by the draft SDF in this regard is unacceptable as desirable densification. The location of the historic central part of Pinelands, being a low density neighbourhood, directly adjacent the site will most definitely have a negative impact on property values.	Quality design should address concerns regarding property values. Research findings do not indicate that development reduces property values.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 23.4	New Development Areas	Golf Courses	a. While in the process of formalising and finalising an Inclusionary Housing Policy, the City has prepared an 'Interim approach on Inclusionary housing until the City adopts a formal policy', as set out in the staff circular (6 of 2020) by Me. Cheryl Walters dated 3 April 2020. The document includes a map which identifies the areas within the City of Cape Town which are deemed a good fit for the provision of inclusionary / affordable housing as it will alleviate accessibility problems to economic areas. The subject site is not situated within such an area and is thus not deemed an appropriate location for inclusionary / affordable housing in terms of this Interim approach guideline of the City. Important considerations in terms of an appropriate location for inclusionary housing are thus proximity to employment opportunities and public transport facilities.	The mentioned circular has no standing in the City. Public land must be considered for the public good.
TB 24	New Development Areas	Golf Courses	I do not the support the conversion of King David Golf club into housing. As it is we have massive traffic problems with pedestrians and home owners struggling to cross forrest drive with cars streaming through the suburb. The golf course is a precious clean green space with beautiful birdlife.	see 23.1 and 22

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 25	SDF	Process	Also considering that there is a GLOBAL PANDEMIC which is ripping through the lives of our society with the government sanctioned mandate of strongly suggesting to stay home, National lockdowns, it would be totally unfair to consider that such a large and massively future changing idea like this (Mowbray Golf Course) be able to pass through during such a tough and difficult time in our history. Also as somebody privileged enough to have access to internet it would be unfair to discriminate against the elderly population who would not have access to such information who are following the rules of staying home and whose risk of contracting Covid19 is much higher. where and when will they have a chance to voice their opinion of this radical SDF idea if the government is telling us to stay home and putting us under lockdown? This most certainly doesn't "Create value for property owners' We hereby entirely object to this idea of the SDF from moving forward in anyway until such time as the GLOBAL PANDEMIC has been resolved and the South African government has declared the NATIONAL STATE OF DISASTER to be over and only then begin the 3 month commenting period.	See previous responses related to process. Further engagement is supported and further opportunities can be taken in future planning processes.
TB 26.1	sub-district 2	Paarden Eiland	Comments previously by the Boat Building Industry as to the loss of access to industrial areas located close to the harbour are valid, BUT they do not need to occupy prime real estate on Marine Drive. In fact many of them, such as Robertson and Caine, have large facilities in Montague Gardens and were previously and for many years located in Woodstock. Marine Drive should be designated mixed use with the rest of Paarden Eiland protected.	The approach to Paarden Eiland has changed based on our greater understanding of the industrial area. Our Data indicates that the boat building sector has operations that are entirely dependent on their current location, many of these locations are along Marine Drive. This sector creates substantial value for the Province and must be protected from further rezoning that would push out this sector which our research shows is highly location dependent. A policy motivation is included in the document annexures. The change in designation will not impact on the rights that have already been granted, but is intended to provide clarity on the economic costs of any future rezoning.
TB 27	sub-district 4	Process	Residents and Cllr Kleinschmidt were unaware of the proposal for Mowbray Golf Course- requests extension and object to proposal	Further engagement opportunity during MSDF comment period
TB 28.1	sub-district 3		welcome the commitment to development on the Oude Molen site and on the site on the western border of Maitland Garden Village (MGV). However, we believe that more could be done to address the severe housing crisis experienced by the residents of MGV, and will raise suggestions for how this could be done in the Table Bay District Plan in submission.	Maitland garden village is identified as an urban support area which enable for future planning attention.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 28.2	sub-district 3	Housing	The essential need to address the current housing crisis experienced in Maitland Garden Village, which has manifested in significant overcrowding, backyarding and overburdened infrastructure. The necessity of including the Maitland Garden Village in all housing development processes on public land in the surrounding area of Subdistrict 3.	
TB 28.3	sub-district 3	Housing	The possibilities for affordable housing delivery provision on several key pieces of vacant land in the area – including preliminary calculations of possible housing yields and opportunities and constraints for each site.	
TB 28.4	sub-district 3	Housing	An aerial desktop analysis revealed an increase of 221 backyard structures in MGV between 2004 and 2020, with 305 such structures observable in 2020. Placing infrastructure constraints on the neighbourhood.	
TB 28.5	sub-district 3	community facilities	Maitland Garden Village is also underprovided for in terms of a number of crucial facilities. Most importantly, the neighbourhood needs access to a health clinic, library and high school. Nearest clinic is 2.5 km away and hospital 5.2km away	For consideration of Community Facilities Planning.
TB 28.6	sub-district 3	housing	the vacant land parcels earmarked for housing development in the district plan are indeed developed to involve the development of inclusionary housing opportunities, some of these opportunities should benefit the neighbouring residents of MGV.	For consideration of human settlements departments.
TB 28.7	sub-district 3	Housing	The issue of housing was the primary concern for the residents of MGV. This concern was followed by access to adequate health services and the issue of crime.	
TB 28.8	sub-district 3	Urban Support Area	Identify MGV as an urban support area	Actioned

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 28.9	sub-district 3	New Development Areas	The Development Action Group has been workshoping and partnering with the Maitland Garden Village Housing Forum in identifying nearby parcels of vacant land that could be used for affordable housing development in response to the housing crisis in the area. While two of these land parcels (Oude Molen and the vacant portion to the west of MGW) have been identified for development in the Draft District Plan, others have not.	
TB 28.10	sub-district 3	New Development Areas	Concern around the type of housing that may be developed at Oude Molen	Edited guidelines to encourage provision of opportunities for a broad range of income groups.
TB 28.11	sub-district 3	New Development Areas	"land by the railway" 5.8 ha is underutilised and could be considered for new development. If not developed for housing, perhaps this could house a neighbourhood-scale clinic or further education and skills training (FET and TVET) facilities linked to industrial job opportunities in Ndabeni and surrounding areas.	Site is included in the new development areas
TB 28.12	sub-district 3	New Development Areas	The land parcel that we have referred to as "Land by the river" consists of 5 hectares of vacant land to the south-west of Maitland Garden Village. It could accommodate approximately 300 dwelling units at a density of 60 du/ha, or 400 units at 80 du/ha.	Site is included in the new development areas.
TB 28.13	sub-district 3	Mechanisms	We suggest that the City of Cape Town explores opportunities to leverage privately owned land for affordable housing, perhaps through inclusionary housing overlay zones or other such incentive-based mechanisms.	Noted, mechanisms are being developed to assist with this.
TB 29	EMF	Heritage	Comments relating to Bo-Kaap HPOZ and heritage- no clarity on how intangible heritage will be recognised, no discussion of restorative justice/forced removals.	LASDF for Bo-Kaap should address many of the issues.
TB 30.1	EMF	Heritage	HPOZ guidelines are non specific "Owners and developers need some level of certainty before embarking on developments or redevelopments. This should be the issue against which all outcomes of assessment of current heritage processes should be measured"	To be addressed by Heritage department.
TB 30.2	EMF	Heritage	The reasons for the often cited negative-heritage-related impacts are, in our view, most often as a result of scale, height and massing issues related to new development proposals.	

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 30.3	EMF	Heritage	The heritage restrictions should be as clear as the height bulk and setback restrictions, which are currently seen as rights by many.	
TB 31	EMF	Heritage	Suggestions are submitted to the MPBL review relating to architectural guidelines for heritage areas	The guidelines are useful, the level of detail appropriate for the District Plan needs discussion with internal departments and LUMS as to the extent they may impact on existing rights. Forwarded to heritage colleagues for further action.
TB 32.1	EMF	Heritage	Guidelines for "the protection and promotion of architectural quality in association with other historic neighbourhoods " may be supported as long as there is a clear definition of a historic neighbourhood – it does not appear so in the Technical Report.	Can be addressed in the report and definitions
TB 32.2	EMF	Heritage	Were the proposed HPOZ category to be retained alongside declared HPOZ's, it would be difficult for the general public to distinguish between the legality of the two, given the complete absence of guidelines for the proposed HPOZ.	Certainty around HPOZ categories should be clarified in consultation with the heritage department. Comments forwarded to the heritage department.
TB 32.3	EMF	Heritage	In this way, the very reason for declaring HPOZ's has been compromised – there is no clarity as to what buildings and streetscapes are truly conservation- worthy and which areas of the city should be more carefully managed than others from a heritage perspective.	Comments forwarded to relevant departments
TB 32.4	EMF	Heritage	the extent of the proposed HPOZ is highly problematic – within the area proposed , there is a vast spectrum of heritage significance of the city's built fabric : from conservation - worthy Art Deco buildings and pleasant streetscapes to modern and plain buildings and hostile and degraded streets. Clearly, there is no homogenous heritage area of the scale depicted on Figure 12.	Comments forwarded to relevant departments
TB 32.4	EMF	Heritage	Refer to source 2017 Jongens, N Declaring Urban Conservation Areas: The art deco townscape of Vredehoek, Cape Town	Noted
TB 33.1	Conceptual Framework	Concept Diagram	It would assist if the names of the opportunity areas and urban support areas that are numbered on the plan could be provided in the legend or tabulated next to the plan.	Actioned
TB 33.2	EMF	Heritage	The V&A Waterfront (V&AW) is listed under National and Provincial heritage sites in Table 2. This suggests that the V&AW in its entirety is either a national or provincial heritage site, which is not the case. Rather, there are individual provincial heritage sites located within the V&AW, namely the historic Clock Tower, Robben Island Embarkation Building on Jetty 1, and the Time Ball Tower on Portsworld Ridge. It	Document updated accordingly

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 33.3	Mapping	Heritage	Clarity is required regarding the number of provincial heritage sites indicated over the Portwood Precinct of the V&AW. It must be confirmed whether the Breakwater Prison has been formally designated a provincial heritage site.	This information can be sourced from the heritage department.
TB 33.4	EMF	Heritage	Guidelines and management priorities for culture and heritage zone how is heritage conservation area defined?	Glossary terms updated to be consistent with the applicable legislation
TB 33.5	EMF	Heritage	There should be a clear distinction between proposed and declared heritage areas. Proposed heritage areas / HPO zones have no legal status and should not be treated similarly to declared heritage areas / HPO zones as the significance of proposed areas has not yet been tested.	Actioned, table updated.
TB 33.6	EMF	Heritage	Why is Green Point mentioned specifically as a heritage conservation area in Table 2 when Figure 12 indicates a number of declared and proposed heritage conservation areas?	The Table's list examples, this has been made clearer with a longer list of examples provided.
TB 33.7	EMF	Heritage	What are the criteria for the delineation of proposed heritage areas? No consultation with ethe V&A on this desigantion and the process on which the proposed HPOZ is based or the nature of heritage significance.	Comment forwarded to heritage colleagues
TB 33.8	EMF	Heritage	property is not a homogenous area in terms of heritage resources. It is therefore apparent that a uniform level of heritage protection over the entire property is not appropriate.	Noted, this is an important point, an attempt to address this has been made in the text for the cultural resources and heritage area table guidelines.
TB 33.9	EMF	Heritage	The mechanism proposed is considered to be unmanageable. It introduces another level of decision-making into a relatively complex area undergoing continuous development and change. A degree of arbitrariness is inevitable. Dual heritage approval processes will be required as the City's Development Management Scheme (DMS) introduces an additional procedural and approval requirement for properties located in a declared HPOZ while applications to Heritage Western Cape (HWC) will still be required in terms of the NHRA.	Noted, the heritage branch is currently investigating more efficient processes.
TB 33.10	SDF	Density	The fundamental issue is the ability to divert development pressure to areas which could accommodate change in terms of potential heritage impacts. The v&AW area is subject to considerable growth and change thus the critical need for flexibility and ability to adapt to development context	Agreed, there is a need for more focused heritage protection to avoid red tape.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 33.11	EMF	Heritage	the compatibility of the HPOZ mechanism with the V&A's zoning ('Development Zone') and the package of plans is questioned	
TB 33.12	SDF		As such, there is vast array of information and documentation on the character forming elements of distinct areas in the V&AW that have led to endorsement of developments by heritage authorities. This will be consolidated into a CMP.	Noted, will be considered in revision
TB 33.13	SDF	Conceptual designations	Why is the Mixed-use intensification category no longer included and mixed use areas reduced	Changed in the revisions.
TB 33.14	SDF	Process	Foreshore area plans should be consulted with V&A	Noted, please reach out for contacts within the Urban Catalytic investments department who are currently drafting proposals.
TB 33.15	SDF		This spatial development guideline could be re-phrased to "support higher densities and intensification in the Canal District, formerly the Gateway Precinct, of the V&A Waterfront to complement proposed Foreshore development". This guideline is supported and is consistent with V&AW planning objectives. 2. Consistent with the role and function of the metropolitan node, higher densities and intensification of land uses throughout the Waterfront compatible with heritage management measures, should be included as a supporting development guideline.	These amendments are supported and included in the revisions
TB 33.16	sub-district guidelines	Parking	Consideration of parking maximums to induce demand for public transport requires further interrogation given public transport capacity and funding and clarification as to whether similar guidelines will be applied to all commercial nodes across the metropole.	Noted, the PT zone policy is currently under review.
TB 33.17	sub-district guidelines	Green corridors	It is suggested that the objectives of the tentative green corridor be explained in terms of a "critical public link" as shown in the 2012 District Plan.	Actioned
TB 33.18	SDF	Mapping	Points of clarity and correction regarding mapping	Noted and will assist with revisions.
TB 33.19	Baseline		Baseline reports need to incorporate additional information	Noted, will refer to comments on Baseline reports.
TB 33.20	SDF	Consistency	Need consistency and unambiguous continuity between District and sub-district level plans.	Inconsistencies will be addressed in revisions.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 34			. Request that the Langa Power Station Site from the graveyard site up to the filter into the N2 be designated for Integrate Low cost and Flisp housing to reduce the MASSIVE housing backlog currently prevalent in Langa. The backyarders situation is a waiting time bomb that will have absolute devastated in the sub council 15 area. The more communities are ignored the more the keg is steaming. Building energy infrastructure on that site is not the silver bullet at the expense of human dignity and social cohesion.	Further engagement with the community through the forward planning for Athlone Power Station as an energy project is supported.
TB 35			Objection & Comments Regarding Municipality's Approvals to Changes to Sectional Title Schemes Plans	Not applicable to District Plans
TB36			Bo Kaap shouldn't be in the City's development zone	The overlapping Zoning issues are being addressed in the LASDF for Bo-Kaap
TB 37			Object to demolition of old houses in favour of concrete blockhouses	Heritage resources are considered for protection by the City where applicable.
TB 38	NMT	Cycling	Demonstration Projects	Forwarded to relevant departments.
TB 39		Homelessness/Rough Sleeping	For this reason, it is imperative for good governance that City economic centres have planned mechanisms to minimise disorderly rough sleeping / squatting / homelessness which, in turn, has a negative impact on the local economy and on the local ecology. It is obvious that the internal dynamics of programs to assist the homeless are the responsibility of social development departments, but it must be realised that only spatial development agency can and should provide for the spatial framework in which such interventions can be optimised. This includes 1) Providing sufficient public ablution facilities (with emphasis on 'sufficient') 2) Planning for suitable spaces where facilities such as safe spaces, shelters and drop-in centres can be located (with the emphasis on 'suitable')	Support further internal engagement and external through CBD recovery and LASDF processes and introduction of a statement in the Civic node guidelines and statements relating to CBD areas.
TB 40.1	New Development Areas	Golf Courses	in support of the identification of the Rondebosch and Mowbray Golf courses as potential residential infill sites. I wholeheartedly support the emphasis in the SDF that these sites be further investigated for development suitability, and that the emphasis be on inclusionary housing and low-income housing.	

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 40.2	EMF	Heritage	An additional comment I have relates to heritage overlay zones. I acknowledge that applying these overlay zones in a blanket way is an efficient exercise, but the effect is that every small addition/change or large development needs to apply for heritage approval - and so many "exemptions" are approved, and in effect over time little has heritage value. A more effective approach would be to identify specific iconic buildings, or streets that have heritage value or create unique cultural or civic value within linear corridors or civic zones.	Forwarded to heritage colleagues
TB 42.1	Implementation	Urban restructuring	Important that areas between Main and Beach roads remain residential. Existing residents have right not to have intrusions of commercial activity. Non residential development should be confined to Main and Regent roads	The desirability of mixed use in this area can be determined on a case by case basis.
TB 42.2	Implementation	Urban restructuring	Concerned about the mixed use intensification area between Main/Regent and Beach roads.	Noted
TB 42.3	SDF	Open Space	Green Point Common has no conservation grading. Should be retained in perpetuity.	The common is an open space zoned area and while not a conservation priority is considered valuable green infrastructure with heritage significance. Green space will always need to be part of this city and the City cannot rule out the need to use parts of this space for various public good related programmes in future.
TB 42.4	EMF	Heritage	Evaluation of heritage assets should be more rigorous and updated	
TB 42.5			Transport Challenges	Forwarded to relevant departments
TB 42.6			Minimal attention to WWT needs solutions to outfalls in marine reserve	Discuss with relevant departments
TB 43	New Development Areas	Golf Courses	This is ridiculous that nobody in Sybrand Park knows that the Rondebosch Golf Course is up for low cost housing. Why was this kept so hush hush? Not acceptable. People who are going to be directly impacted should have been polled for their opinions. Your feedback in this matter would be greatly appreciated	These are forward planning proposals and no change in use is imminent in the short term. Given the shortage of land to accommodate future inclusive growth, these areas are being considered I & AP's will be given future opportunities to comment.

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
TB 44	New Development Areas	Golf Courses	most ridiculous idea to build houses on Rondebosch golf course when all the services in nearby Sybrand Park are in a desperate state .Will just put more strain on non functioning services in nearby suburbs.,not to mention sewerage. Please scrap this idea.	These are forward planning proposals and no change in use is imminent. Given the shortage of land to accommodate future growth and inclusive growth, these areas are being considered I & AP's will be notified.
TB 45.1	New Development Areas		We don't have the infrastructure to support expansion , evident by the sewerage leaks at the Woodstock OCCUPIED HOSPITAL , we don't have the road infrastructure to support the densification , much less where the city intent to just ignore parking being allocated to new developments	Problems in the sewer infrastructure are addressed in the implementation plan. Replacement of aging sewer lines is as priority in the area and can be considered in the development application phase.
TB 45.2	New Development Areas	Character	infilling could ruin the character of the space. The protection of visual, historic and archaeological qualities is of importance, permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.	There will be further opportunity to address the impact of developments at the site development plan stage.
QUEENS PARK The following comments relate to parks in Woodstock which are removed from the New development map layer in the next revisions and are not being considered for any development unless related to open space improvements and in consultation with the affected community.				
	New Development Areas	Woodstock Parks	Recommend Queens Park remain a sports ground.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	I trust that the city will find other suitable unused land to zone for housing rather than deprive the community of such well-used and valued resources. (Queens Park Sports Ground)	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	As a Woodstock resident, I believe the loss of green space in our area will have a negative impact on our community and hope you consider alternative options.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	Queenspark is the most frequented park in woodstock and has always been well looked after. public spaces like these breath fresh air into the community and are invaluable to it's health.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	This is an important social and green space and is greatly utilised by not only the local residents but people who come to enjoy the amenities from further afield. The soccer fields service a soccer club that has a vibrant membership and is a community hub in the area.	No changes are planned for Queens Park

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
	New Development Areas	Woodstock Parks	This is my strong objection to the planned housing development of Queenspark sports ground and the adjacent play parks. These parks are the only well maintained and well-used public sports field and park in the entire upper Woodstock area.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	If they have already been removed from the list of sites up for development, then feel free to discard this note and accept my gratitude for allowing us to keep these special plots as communal space. If not, I hope this message makes clear that we need these parks to stay parks, for the health and vibrancy of our neighborhood.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	I am referring specifically to the Queen's park dog and children's parks, as well as to the soccer field, and to the Golders Green dog and children's parks. These are essential Green spaces that are used by Woodstock residents on a daily basis to meet, socialize and build community spirit	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	I am a home-owner in Woodstock and I agree with the decision to earmark the queenspark sports ground for affordable housing. Gentrification is a major issue in this district and we need to make sure that space is made available where necessary.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	this land is one of the very few soccer fields in Woodstock. In fact, it might be the only soccer field in Woodstock. It is a field that is very well used.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	The earmarked space for housing development at the queenspark sportsground will impose on my privacy.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	I am NOT in favour.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	taking away vital green/recreation areas such as the dog park, play park and soccer grounds simply does not make sense. These are areas that are so well utilised by the community.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	This email is to comment on the draft to build social housing in the sports and kids park in Woodstock, Golders Green. I strongly oppose this as the kids park plays an integral part in our family and neighborhood. We don't have a backyard so we visit this park on a daily basis for our kids to play and play with our dog.	No changes are planned for Queens Park

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
	New Development Areas	Woodstock Parks	Myself and my daughter are OPPOSED to this idea as it leaves no green space within Woodstock at all that is safe and maintained. Its a very dense living area already, with little to no space for our children to play. In addition, it is not safe on the streets and the Queenspark area represents a space where families in the area can meet and play and enjoy a community spirit	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	I would just like to voice my concerns re the development of Queenspark in Woodstock. It is the only park where our kids and dogs can play and it is also the only place in the area where we can get out and converse with our neighbors.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	The park is the only green area within our school community and is being utilised daily by children playing outdoors, it will be a shame to lose this gem of an area within our community.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	this park was donated to the residents for use as public open space and , must be kept as such .	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	to remove parks, of which there are limited, in an area that has limited garden space, will be of great detriment to the community children and for residents needing to exercise pets or socialise in general. These spaces are a needed party of the community fabric.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	This is an important Green Space in our residential area that is used by all residents, yet the City has earmarked it for development. While densification of urban fabric will happen in City's over time, the relief spaces that are offered by Public Open Space within these areas become more and more important with the increase of residents.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	concerted effort from the city needs to be made to conserve areas thats are zoned as community or open spaces. In my opinion, this is intrinsic to the success of densification.	No changes are planned for Queens Park

Submission Ref No	District Plan Overall Theme	District Plan Sub theme	Comment Summary	Response
	New Development Areas	Woodstock Parks	I understand the need for new affordable housing, and am pro that policy - but surely not on one of the few green parts of woodstock and salt river that are used each day but the community. kids can only go to that park, dogs walk, and every day the sports facilities are used. there are multiple other city owned plots that could be used that are NOT used by the community all the time.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	Green public space is in incredibly short supply in the area, and developing this last outcrop of green space would deprive an entire community of a space in which health community building activities can safely take place.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	I live at 39 Queens Park, which is directly opposite these parks. These are thriving spaces used by our community. People use them all day, every day because all the other parks in our neighbourhood is unsafe and unkept. I urge you not to go ahead with this as it would completely deplete the Woodstock community of ANY safe public spaces to retreat to.	No changes are planned for Queens Park
	New Development Areas	Woodstock Parks	Are there no other places available for this type of development? Does the City need to take this, the only well maintained and well-used public sports fields in the entire upper Woodstock area, and utilise same for housing?	No changes are planned for Queens Park