

CT SDF Final Draft (2010) Response to comments received

Annexure 5

Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
Comment Theme: The Natural Environment					
6.4	Prof Susan Parnell	Dept Env & Geogr Sciences, UCT	Which areas are biodiversity areas? Uncomfortable with classification 'No natural vegetation - settlement'.	1. Environment	Biodiversity areas are reflected in Map 5.5. "No natural vegetation - settlement" has been taken off Map 5.5
6.5	Prof Susan Parnell	Dept Env & Geogr Sciences, UCT	Need to map fire breaks as these could be used in battles over territory.	1. Environment	This level of mapping is more appropriate at the District Plan scale. In addition, it may not be appropriate for a long timeframe plan, such as the SDF, to refer to firebreaks which change overtime. Authors comment referred to the District plans.
6.6	Prof Susan Parnell	Dept Env & Geogr Sciences, UCT	Need to map perennial rivers and streams. Refer to Map 6.4 wrt Bokkemanskloof area. This may affect future assessments of land use change.	1. Environment	Author directed to Map 5.6 – Aquatic network which has been revised on the basis of this comment. The CT SDF uses GIS layers supplied by the relevant departments within the City. This comment has thus also been referred to the relevant Department.
6.7	Prof Susan Parnell	Dept Env & Geogr Sciences, UCT	Small holdings along the Disa River should be shown as rural	1. Environment	No smallholdings within the urban edge have been shown. Land use guidelines for these areas are to be included into the district plans.
6.8	Prof Susan Parnell	Dept Env & Geogr Sciences, UCT	Definition of 'rural development' is problematic especially the reference to land reform.(6.2.8 pg 58)	1. Environment	The definition has been edited on the basis of this comment.
14.1	Simone de Wet	Private / No organisation listed	Object against massive development planned for Gordon's Bay. Degradation of the earth & housing delivery	1. Environment	The CT SDF does not confer or take away rights. Changes in land use rights require LUPO, NEMA and NHRA assessments. Policy P43 deals with issues related to the quality of the built form.
24.7	Christo Kannenberg	Planning Partners	The city should discuss the streamlining of planning processes with province e.g. NEMA processes	1. Environment	NEMA is national legislation and can only be amended by Parliament. The Provincial DEA&DP do lobby for change at a national level, and the City and DEA&DP have various forums for coordination and alignment of development assessment procedures.

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39.1	Samantha Ralston	Cape Nature (Scientific Services)	Pleased to note that biodiversity has been given appropriate recognition in the SDF. However, there are some areas of conflict, where critical biodiversity areas (CBA's) have been earmarked for development. These should be highlighted in the SDF and where appropriate, earmarked for environmentally responsive development.	1. Environment	The biodiversity network, whilst a major informant into the CTSDf, is not the only informant. Planning is ultimately about finding a balance between competing objectives. The approval of the CTSDf as a structure plan does not give or take rights, nor does it negate the need to follow due process i.t.o. the applicable legislation (i.e. NEMA & LUPO). The CTSDf provides a signal for the assessment of applications and states under section 1.3 "... other maps, figures and text in the CTSDf are included for illustrative purposes intended to broaden the general interpretation of the CTSDf and will act as informants to the interpretation of the statutory components of the CTSDf. The preparation of spatial plans and the assessment of development applications must therefore be guided by due consideration of these informants when interpreting the statutory components of the CTSDf."
39.2	Samantha Ralston	Cape Nature (Scientific Services)	Recommend the use of biodiversity offsets or a similar tool eg conservation tax, where there is to be a loss of natural habitat.	1. Environment	Agreed and incorporated into Policy P 25. Buffer 1 areas on Map 6.1 are typically suitable for biodiversity offsets. The Bioregional Plan being drafted by the City will deal with this issue more comprehensively.

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39.3	Samantha Ralston	Cape Nature (Scientific Services)	<p>Sand mining is a significant threat to biodiversity in the city. Support for the proposed policy in this regard.</p> <p>Concern re Critical Biodiversity Areas (CBA) and land SDF earmarked for development. Such conflicts should at least be highlighted to ensure appropriate controls / sensitive development.</p> <p>Encourage use of/consideration of tools incl: biodiversity offsets, conservation tax</p> <p>Encourage pro-active (not piecemeal) approach to formally protect high conservation priority areas</p> <p>Support policy of exploiting sand resources before development in order to minimize impact of sand mining on biodiversity</p>	1. Environment	<p>Additional guidelines for avoiding and mitigating biodiversity conflict areas is provided in the District SDP / EMFs and will also be addressed in the Bioregional Plan.</p> <p>A study is being commissioned this year to improve the City's information on mineral resources within the City of Cape Town area.</p>
42.1	Kate Snaddon	Western Cape Wetlands Forum	<p>Section 3 : Add in that the loss of open space and surface connectivity between wetlands, rivers and the surrounding land has had a major impact on the biodiversity value and ecological functioning of, in particular, fresh water ecosystems. The city's natural and ecological services must include ecological corridors and not just critical biodiversity areas, wetlands and agricultural areas.</p>	1. Environment	<p>Policy P26 has been edited to include this comment.</p>
42.3	Kate Snaddon	Western Cape Wetlands Forum	<p>Section 4.3 : None of the principles deal explicitly with the City's biodiversity.</p>	1. Environment	<p>Noted but we do not agree as the following principles in the CTSDF adequately address the concern. "Work harmoniously with nature, reduce the city's ecological footprint, and introduce sustainable risk reduction measures" and "Adopt a precautionary approach to the use of resources, switch to sustainable patterns of resource use, and mitigate negative development impacts.</p> <p>Additional guidelines for avoiding and mitigating biodiversity conflict areas is provided in the District SDP / EMFs and will also be addressed in the Bioregional Plan.</p>

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42.4	Kate Snaddon	Western Cape Wetlands Forum	Section 4.4 : Suggests extra wording in 4.4.2 (relating to biodiversity and fresh water ecosystems etc) The problem of poor water quality in the city is not addressed in this section.	1. Environment	Policy P26 has been edited to include this comment.
42.5	Kate Snaddon	Western Cape Wetlands Forum	Section 6: Policy 20 : Suggest more specific wording and to include a statement regarding the unacceptable water quality in most of the city's rivers and many of its wetlands.	1. Environment	Comment is supported and has been incorporated into Policy P26.
51.2	Jaco Schreuder		Essential to preserve our beautiful natural environment as this is one of the big attractions for tourists. Need more indigenous vegetation and a serious stand vs littering.	1. Environment	Agreed.
56.3	Shaun Schneier		Table 6.1 (pg 61) should include a reference to urban agriculture and appropriate techniques including greenhouses and hydroponics.	1. Environment	Agree with comment but feel this is too much detail for a citywide policy document such as the CT SDF.
61.4	Frank Wygold	Cape Environmental Trust (CAPTRUST)	Far greater vigilance should be exercised to protect wetlands, river environs and estuaries.	1. Environment	Agreed. The SDF adequately covers the land use related policies required.
62	Dr Kevin Winter	Friends of the Liesbeeck	Disappointment that scant attention is being given to urban drainage and water sensitive urban design. Ecological services in the flood plains of rivers and wetlands are not given nearly enough attention.	1. Environment	Policy 26 has been edited to address this concern, within the parameters of the CT SDF. A number of other departments within the City are responsible for protecting and managing water resources.
65.5	Joy McCarthy	Table View Ratepayers Assoc	Public open spaces are vital and should not be sold off for development.	1. Environment	The comment has been considered. This is true for some areas. However, in other areas excessive and unmanaged public open space creates a security risk as well as other problems.
71.1	Andre Beukes	First Plan T&R Planners	Motivates for the exclusion of the developable portions of portion 16 of farm No 220, Farm No 212, Farm No 221 and Farm No 222, Cape Town from the protected biodiversity corridor.	1. Environment	The information related to these sites on the maps has been checked and corrected
73.1	Kim Kruishaar	Independent Environmental consultant living in the Far South Peninsula	The proposed policies are not sufficiently clear or brave enough to address the environmental challenges facing Cape Town. Ecological services are fundamental to the survival of the city's residents and do not just benefit tourism.	1. Environment	Policy 26 has been edited to address this concern, within the parameters of the CT SDF. A number of other Departments within the City are responsible for protecting and managing water resources.

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73.3	Kim Kruishaar	Independent Environmental consultant living in the Far South Peninsula	Need to promote a new culture of sustainable living and of sustainable development. Eg rain water tanks, waste management and urban agriculture.	1. Environment	Policy P30 & 31 have been edited to address this concern
73.4	Kim Kruishaar	Independent Environmental consultant living in the Far South Peninsula	The bio-physical constraints of the city need to be acknowledged eg identification of the carrying capacity of the city in terms of how many people with an acceptable quality of life can be sustained and secondly the size of the city's footprint.	1. Environment	Carrying capacity and ecological footprint are both influenced by the efficiency of resource use: Policies P30 and P31 of the SDF.
75.1	Rudi Botha	Urban Studio	Comments refer to Philippi Horticultural Area (PHA). Urban edge should address the realities of this area to ensure its long term sustainability. Eg reduction of farmers over the last decade, uncontrolled informal settlements and illegal uses. Need to launch an integrated planning and design process for the PHA.	1. Environment	Arising from the City's evaluation of the RAPICORP application, a Philippi Horticultural Area Task team was set up and a rapid review of the PHA was undertaken involving a number of consultants. One of the recommendations of the review was for the City to investigate mechanisms to facilitate increased horticultural farming in the PHA. This internal study / review is currently underway - refer TOR: an Urban Edge and Development Guidelines Study for the Schaapkraal Smallholdings Area and Environs in the Philippi Horticultural Area (PHA) - 25 January 2011.
80.06	Mr John Wilmot	Durbanville Heritage Society	Quarries need screening policies; Mining areas should be rehabilitated	1. Environment	Policy 29 and related guidelines address this issue from the City's SDF perspective. The City also continues to engage with the Department of Mineral Resources in terms of monitoring and management of mine areas and rehabilitation.
85.02	Rod Gurzynski	Kommetjie Residents & Ratepayers Association	Infrastructure: Map 3.1: Proposed developments in S Pen will impact negatively on Wildevoelvllei	1. Environment	Agreed. The City is aware of this challenge.
85.03	Rod Gurzynski	Kommetjie Residents & Ratepayers Association	Natural Environment: 3.1.2 Concern re loss of biodiversity, wetlands, agricultural land through uncontrolled urban encroachment and pollution	1. Environment	Agreed. Policy P25 and Policy 23 address this concern. In addition the City plans to prepare a Bioregional Plan. The Biodiversity Network will form the basis of the Bioregional Plan and is already integrated into the SDF and District plans.
85.07	Rod Gurzynski	Kommetjie Residents & Ratepayers Association	Agricultural (map 6.5) areas should be identified in S Peninsula. Small areas can accommodate small-scale agriculture.	1. Environment	Noted. Further studies will take this comment into account.

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86.04	Geoff Neden	Far South Peninsula Community Forum	SDF doesn't adequately address environmental issues. No real policies to minimize wasteful consumption.	1. Environment	Former policies P30 & P31 have combined as Policy P30 and been edited to address this concern within the parameters of the SDF. A number of other City departments are charged with the responsibility of protecting and managing the use of natural resources and they have/ are drafting the necessary By Laws, strategies and concerns raised by the author.
86.11	Geoff Neden	Far South Peninsula Community Forum	Concern re Agri to Industrial rezoning along Kommetjie Road and the impact of this on the wetlands	1. Environment	An environmental assessment will need to accompany a rezoning application that covers a site with wetlands.
86.14	Geoff Neden	Far South Peninsula Community Forum	Environment: Cape Floral Region World heritage Site: There is no reference to CFRWHS legislation, Buffer zone management Plan & identity of the Management Authority	1. Environment	The CT SDF is a spatial plan which has been prepared at a metropolitan scale and intended to establish high level principles, goals and spatial strategies. Author referred to policies P25 - P29.
86.15	Geoff Neden	Far South Peninsula Community Forum	Vision statement: In light of unique natural environment (Both Cape Floral Region World heritage Site and National Park in city) a more appropriate vision statement would be: "To, by 2040, ensure that CT is an inspiration to the world showing how urban planning sensitive to the surrounding unique natural heritage is able to sustain an economically vibrant city which enriches the health and well-being of all who live in it or are attracted to visit it."	1. Environment	The author raises a valid point but it is beyond the scope of the CT SDF to change the vision statement. The vision statement is part of the draft City Development Strategy (CDS) which is currently being discussed with stakeholder groupings. These comments will be forward to the CDS drafting team.
88.01	Allen Rose-Innes	Fish Hoek Valley Ratepayers & Residents Association	Environment: Concerns regarding attention given to environmental issues including the overemphasis of the importance of "immediate physical and economic urban development". It is argued that "... environmental sustainability is paramount". Planning for the future development of Cape Town should be revised to include greater professional environmental understanding" and it is requested that sufficient and suitably qualified environmentalists be involved in the planning process.	1. Environment	Agreed. The CT SDF maps indicate the areas in which the environment should be paramount.

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93.18	Rory Sales	Noordhoek Conservancy	Support policies however: wind turbines on erven are undesirable due to noise factor, safety, insufficient wind levels in Noordhoek, aesthetically displeasing. Recommend that wind power be built on large properties >10ha away from residences and consist of larger units spread in appropriate locations throughout the City to provide a grid that supplements and balances overall power system.	1. Environment	Former policies P30 & P31 have been combined as Policy P30 and been edited to address this concern.
93.19	Rory Sales	Noordhoek Conservancy	Recommend that roof top thermal and photo-voltaic panels be considered. Bylaws which promote feeding into City grid should be a priority to encourage homeowners to invest.	1. Environment	The City and Provincial Government of the Western Cape are already dealing with this issue.
95.22	Gavin Smith	Greater Cape Town Civic Alliance	SIA - There are inherent contradictions like maintaining land for urban agriculture while promoting industrial development.	1. Environment	Planning is ultimately about balance, the challenge is to find an appropriate middle ground / land use distribution which promotes sustainable forms of production and minimizes negative externalities / impacts.
95.24	Gavin Smith	Greater Cape Town Civic Alliance	The restoration of degraded areas must be emphasized.	1. Environment	Supported , addressed in Policy P25.
95.31	Gavin Smith	Greater Cape Town Civic Alliance	It is important to increase the amount of space for food production - NB agricultural zoning and methods of food production.	1. Environment	Agree with comment at the level of principle
95.32	Gavin Smith	Greater Cape Town Civic Alliance	As wine farming is integral to the economic value of Cape Town there needs to be reference to the land used specifically for this purpose.	1. Environment	The areas of high potential and unique agricultural land and those of significant value shown on Map 5.7 and policy P28 address this comment adequately
95.34	Gavin Smith	Greater Cape Town Civic Alliance	Biodiversity must not be linked to pockets for tourists, but to genuine conservation efforts.	1. Environment	Supported. Refer to District SDPs for more information.
95.63	Gavin Smith	Greater Cape Town Civic Alliance	P20 - Critical that extensive infrastructure upgrades be commissioned Clamp down on illegal water extraction and promote reduction of water demand	1. Environment	Policy P26 has been edited to include this comment.
95.68	Gavin Smith	Greater Cape Town Civic Alliance	P30 - This Policy is short on detail. The City is paying insufficient attention to the issue of energy demand. There is no reference here to recycling water.	1. Environment	The CT SDF is a spatial plan which focuses specifically on spatial strategies. Refer to policy P30. Comment passed on to water dept.

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95.7	Gavin Smith	Greater Cape Town Civic Alliance	P48 - Policy supported, but reality appears to be stronger than any written word. (Princess Vlei proposed Shopping Mall)	1. Environment	This comment relates to a development application and should more appropriately be submitted as a public comment on the application.
95.71	Gavin Smith	Greater Cape Town Civic Alliance	P49 Insufficient attention is currently being given to protection of areas of biodiversity, such as Princess Vlei, where serious consideration is still being given to the building of a shopping mall, which the CTSDf cautions against elsewhere. Dependent on the outcomes of the District SDPs.	1. Environment	The proposed Princessvlei shopping centre pre-dates the SDF and has received a positive Record of Decision from DEA&DP. However, no final decision has yet been made as the ROD lapsed and DEA&DP must consider whether it should be extended.
96.11	Simon Liell-Cock	Far South Peninsula Community Forum	In this age of climate change, peak oil, limited water and electricity resources, the SDF should favour a vastly different economic model. The economy should thus be redirected to enhancement of the environment. New development and densification (redevelopment), whether residential, commercial or industrial must include solar geysers. Rain-water tanks would not only save water but would mitigate against hard surfacing and urban runoff that accompanies densification. Supply of these components would help to enhance the environment and add to the economy. Nutrient rich water from waste water treatment plants could be used for irrigation for small scale farming activities and sports fields etc. The report lacks imagination in terms of solutions. Policies that seek to grow both the City and the economy at the expense of the global and local environment are not supported.	1. Environment	The comment has merit. The CTSDf's transport and growth management strategies support this view Sections 5.1.4, 5.1.5, 5.2.1 and 5.2.3 support this.
96.12	Simon Liell-Cock	Far South Peninsula Community Forum	A serious omission is the Cape Floral Region World Heritage Site (CFR WHS). Although the CFR WHS is mentioned in the Draft SDF Technical Report, there is no reference to (a) the relevant WHS legislation; (b) a Management Plan for the Buffer Zone; and (c) the identity of the Management Authority.	1. Environment	Table Mountain National Park is one of the eight protected areas in the Western Cape proclaimed in 2004 as World Heritage Sites in terms of the World Heritage Convention Act 49 of 1999. Management of the area is the responsibility of SAN Parks. Management of the TMNP and City interface is coordinated by a bilateral forum. Map 5.8 shows World Heritage Sites.

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96.13	Simon Liell-Cock	Far South Peninsula Community Forum	<p>This CFR WHS was proclaimed to protect the area's biodiversity and ecological processes. The TMNP is merely a management agency for protecting the biodiversity and ecological processes on the publicly owned land. The privately owned land is proclaimed "Buffer" in spite of the fact that large portions could (in regard to their biodiversity and ecological processes) qualify as "Core". Their protection is therefore imperative, irrespective of ownership. A Management Plan for the CPPNE (Buffer Zone land outside the TMNP) must be established in terms of The National Environmental Management: Protected Areas Act (No. 57 of 2003). The CPPNE was established long before the 2003 Protected Areas Act was promulgated. Section 28 (7) of Act 57 of 2003 states that an area which was protected before this section took effect, must be regarded as having been declared as such in terms of this section. The CPPNE is therefore a protected area in terms of this Act. This status must be reflected in the Draft SDF Technical Report. The proclamation of the CFR WHS refers to each property that is included in the Core and Buffer zones of the Peninsula Section of the CFR WHS. The Proclamation can be easily obtained on the Internet. As far as we know all the properties are designated outside the Urban Edge.</p>	1. Environment	<p>The CPPNE and TMNP boundaries have been added to the biodiversity and agriculture map in the SDF. The City works closely with TMNP and PG:WC to continue to expand the protected and managed areas of the park and to manage development in the buffer areas around the park. Proclamation of the CFR WHS refers to the TMNP and not the larger CPPNE area (see http://whc.unesco.org). All areas covered by the CPPNE are however outside the urban edge and are subject to NEMA regulations.</p>
96.17	Simon Liell-Cock	Far South Peninsula Community Forum	<p>The implementation of an EMF in order to mitigate the effects of the SDF does not meet the legal requirements</p>	1. Environment	<p>EMFs have been integrated into the District SDPs in order to guide development decisions in terms of both NEMA and LUPO. The EMFs are not intended to mitigate the impact of the SDF, but to inform the location and form of development.</p>

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96.26	Simon Liell-Cock	Far South Peninsula Community Forum	We note that urban agriculture is accommodated within the SDF but there is no indication of where this could be located. Surely the smallholding area adjacent to the wetlands would ideally suit this purpose? Quality soil is not the only criterion for agriculture to succeed. New methods of crop production that are not reliant on soils exist and could be employed to contribute to food security in the valley. There is no mention in the draft document of Eco or Agri villages in appropriate locations. Creative use of agricultural zoned land that would contribute to the tourist experience, offer employment opportunities and which would generate revenue from tourism should be encouraged.	1. Environment	Policy P28 has been edited to incorporate the content of this comment.
100.25	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Biodiversity needs a section of its own, as well as its own strategy	1. Environment	The CT SDF has to address a broad range of concerns in a balanced way. Map 6.1 incorporates a bioregional map. The Bioregional Plan that is being drafted by the City is the more appropriate vehicle for addressing the management of biodiversity.
100.26	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Agricultural land needs its own section and its own strategy. Agricultural land is a topic dealt with inadequately. All agricultural land (not just prime land) needs protection. It should be one of the goals of the CT SDF to secure agricultural land (even if not for immediate use) – for future local food production, for conservation of winelands, for recreational gardening, for educational and recreational agriculture, horse riding and public open space.	1. Environment	It would be inappropriate for it to have its own strategy. The agricultural study used a broad range of factors to identify the areas of greatest value. The Development Edges policy P23 and more specifically Table 5.5 also addresses this concern. Policy P 28 has been edited to include existing farmed areas.
100.27	Graham Noble	Scarborough Ratepayers & Ratepayers Association	TMNP is not mentioned. No mention of a baboon strategy. There are no goals, key principles or strategies to plan how the Cape Peninsula (mosaic between TMNP and City) should function as one ecological and spatial system. TMNP needs its own plus a strategy in CT SDF to be complete.	1. Environment	The TMNP is shown in the biodiversity and agriculture maps of the SDF and included, together with Provincial and Local Authority protected areas, in the biodiversity network. The management of individual species, such as baboons, cannot be addressed at a city wide scale such as the SDF.

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101.13	Liz Brunette	Constantia Hills Residents Association	Explain "peak oil" in the 2nd bullet under 8.3	1. Environment	Peak oil is the point in time when the maximum rate of global petroleum extraction is reached, after which the rate of production enters terminal decline. This concept is based on the observed production rates of individual oil wells, and the combined production rate of a field of related oil wells. It raises warning bells about Cape Town's dependence on motorized transport and the inefficiencies of the city's current form.
101.16	Liz Brunette	Constantia Hills Residents Association	What does the reference to "peak oil" mean in the introduction?	1. Environment	Peak oil is the point in time when the maximum rate of global petroleum extraction is reached, after which the rate of production enters terminal decline. ^[1] This concept is based on the observed production rates of individual oil wells, and the combined production rate of a field of related oil wells. It raises warning bells about Cape Town's dependence on motorized transport and the inefficiencies of the city's current form.
102.1	Alan Jackson	Greater Lynfrae Civic Association	In terms of the Municipal Systems Act a Strategic Impact Assessment (SIA), evaluating the impact of the citywide and/or district level plans must be undertaken, but the CTSDf suggests that this is included as a longer term, medium term or shorter term product. This makes no sense- the SIA must be undertaken before the CTSDf is considered, and certainly before any CTSDf is accepted. Without it, the city and Civil Society is in no position to determine whether the CTSDf is acceptable or not and there is an opportunity for unscrupulous developers to seize opportunities before the SIA, District SDFs and Local SDFs are implemented.	1. Environment	A Strategic Impact Assessment was undertaken in 2007 and informed the preparation of the SDF. A summary of strategic impacts is included in the CTSDf.

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102.13	Alan Jackson	Greater Lynfrae Civic Association	Support water demand management and well managed and sustainable limited use of aquifers, water-recycling, and desalination but we don't believe that sufficient attention is being given to demand management, particularly at the level of Industry and the very wealthy.	1. Environment	Former policies P30 & P31 have combined as Policy P30 and been edited to address this concern within the parameters of the SDF. A number of other City departments are charged with the responsibility of protecting and managing the use of natural resources and they have/ are drafting the necessary By Laws, strategies and concerns raised by the author.
102.34	Alan Jackson	Greater Lynfrae Civic Association	P19 - We are concerned that insufficient attention is currently being given to protection of areas of biodiversity, such as Princess Vlei, where serious consideration is still being given to the building of a shopping mall, which the CT SDF cautions against as being bad for small businesses.	1. Environment	The proposed Princessvlei shopping centre pre-dates the SDF and has received a positive Record of Decision from DEA&DP. However, no final decision has yet been made as the ROD lapsed and DEA&DP must consider whether it should be extended.
102.35	Alan Jackson	Greater Lynfrae Civic Association	P20 - We support this policy, pending the general acceptance by Civil Society of District SDFs and Local SDFs, but note that, while there is minimal mention of minimizing demand for water under LUM guidelines, there is no mention of reducing demand in the Means/Required column, and no detail about how this will be done. Because this is absolutely critical to protection of water systems, we are deeply disappointed at the lack of attention to this area.	1. Environment	Former policies P30 & P31 have combined as Policy P30 and been edited to address this concern within the parameters of the SDF. A number of other City departments are charged with the responsibility of protecting and managing the use of natural resources and they have/ are drafting the necessary By Laws, strategies and concerns raised by the author.
102.36	Alan Jackson	Greater Lynfrae Civic Association	P22 - We support this policy, pending the general acceptance by Civil Society of District SDFs and Local SDFs, but note that the recent decision by Mayco to recommend the extension of the urban edge at Uitkamp does none of this.	1. Environment	No comment required
102.46	Alan Jackson	Greater Lynfrae Civic Association	P30 + P31 are short on detail. The City is paying insufficient attention to the issue of energy demand, That there is no reference here to recycling water and desalination of water.	1. Environment	Former policies P30 & P31 have combined as Policy P30 and been edited to address this concern within the parameters of the SDF. A number of other City departments are charged with the responsibility of protecting and managing the use of natural resources and they have/ are drafting the necessary By Laws, strategies and concerns raised by the author.

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102.47	Alan Jackson	Greater Lynfrae Civic Association	P34 - With regards the recommendation that the City develops management partnerships with ratepayers associations, we have grave concerns about the latter. It is not the role of ratepayers associations to undertake management which is the responsibility of the City.	1. Environment	Agreed. This recommendation has been deleted.
103.1	Patrick Dowling	WESSA	The maintenance of environmental integrity, as defined by ecological, economic and social criteria must be a primary determinant of land use planning	1. Environment	Agreed. Development applications assessments require assessment in terms of legal requirements including LUPO, NEMA and NHRA.
103.16	Patrick Dowling	WESSA	The CTSDf needs to restore credibility by focusing on need for legally binding aspects of CMOS and CPPNE to be protected;	1. Environment	The CMOS concept has been superseded by the bioregional planning categories specified in the Provincial Spatial Development Framework. The PSDf is approved in terms of S4(6) of LUPO . See appendix C(i) for more details. The development guidelines are outlined in the relevant District SDP. Similarly, the CPPNE remains a protected area status, but has been superseded largely by the proclamation of the TMNP. Development activities within the CPPNE remain subject to the management guidelines established for those areas.
103.17	Patrick Dowling	WESSA	The biophysical environment should come first – political pressure must be resisted to prevent precedent setting erosion of natural resources;	1. Environment	Agreed but is also important to note that City has the unenviable task of having to manage growth and create a balance between urban development and environmental protection.
103.21	Patrick Dowling	WESSA	Support for concerns expressed regarding climate change, hydrological, energy, food and oil.	1. Environment	No comment required
103.23	Patrick Dowling	WESSA	Slavish position around market trends in Resilience and Adaptivity section	1. Environment	Change and growth are inevitable. What is important is how the city chooses to deal with them. The CTSDf makes it clear that urban development must respect the presence, role and function of natural assets (see Section 4.3).
103.24	Patrick Dowling	WESSA	Green anchors supported	1. Environment	No comment required

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
103.6	Patrick Dowling	WESSA	Extensive comment provided on a 2007 document produced by the City by Ninham Shand entitled Strategic Assessment of the Environmental and Heritage Impacts of the CTSDf process – concern that there has not been a process of this sort to review environment and heritage impacts to knowledge of WESSA. Comments relating to the 2007 Ninham Shand document and cross referenced to the CTSDf include: (1) Avoid impacts of development as opposed to mitigation to prevent unsustainable cumulative impacts. (2) CTSDf suggests a less precautionary approach than that advocated by PSDf and MSA, Need for sustainability criteria, (3) CTSDf must address limitations noted by 2007 Ninham Shand document,	1. Environment	The 2007 Strategic Impact Assessment informed the preparation of the SDF, along with a number of other research documents and investigations. The SDF is intended to guide development towards appropriate areas and sustainable forms of development, promoting public welfare and sustainability whilst protecting natural and heritage resources.
103.7	Patrick Dowling	WESSA	Recommendations for inclusions under Policy 21 under what this means / requires from Integrated Coastal Management Act – The City will implement relevant provisions of the Integrated Coastal Management Act (No.24 of 2008) to ensure that the use and enjoyment of the coastal environment are sustainable (act provisions quoted in comment	1. Environment	Reference to this act has been included in this policy - see Policy P27.
105.6	Patrick Dowling	Kommetjie Residents & Ratepayers Association	Cumulative impacts in Fishoek and Noordhoek are being experienced in the form of: Toxic algal blooms in Wildevoel vlei, Road pavement breakup, Traffic congestion, Baboon human conflict, Loss of public views, Solid water water generation, Freshwater supply pressures. It is urgent that the SDF paves the way for a more sustainable and cautious approach to development in Kommetjie.	1. Environment	The City is aware of these challenges. They are beyond the scope of the SDF to address. The IDP and 15 year growth management plan are the more appropriate vehicles for addressing them.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
105.7	Yachita Reddy	Sustainable Energy Africa	The CTSDf must take into account a resource constrained future in its planning i.t.o. land use, density, connectivity, proximity and other urban form attributes to mitigate against risks of excessive costs from declining food security, global warming, rising fuel prices, building costs, traffic congestion, welfare costs and reduced economic competitiveness.	1. Environment	Agreed.
105.8	Yachita Reddy	Sustainable Energy Africa	Recommend that strengthened emphasis be afforded to climate and resource constraint challenges given the long time frames it takes to implement policies to mitigate against these challenges. The schedule of tasks arising out of policy statements in Appendix G only features 2 minimal priority actions with respect to climate change reflecting that climate change is not a high priority.	1. Environment	This concern is addressed by the CTSDf in the following principle "Adopt a precautionary approach to the use of resources, switch to sustainable patterns of resource use, and mitigate negative development impacts".
105.9	Yachita Reddy	Sustainable Energy Africa	The Green paper re: National Climate Change Response strategy requires alignment of local govt. policies and strategies (in its current form) – it identifies critical loci in which national responses to climate change are to be located, particularly with regard to urban form, livelihoods and human settlement patterns – it is imperative that this strategy is held firmly in the SDF.	1. Environment	The provisions of the National Climate Change Response Strategy are supported by the City and have, to the extent that is feasible, been incorporated into the CTSDf.
108.1	Kate Snaddon	Western Cape Wetlands Forum	Further submission. Suggests Biodiversity Act 2004 definition for ' diversity. Open space needs to be put aside for the protection and enhancement of aquatic biodiversity and ecological functioning. Not only consumptive uses (i.e. water supply) but also non consumptive uses (ie using rivers etc for discharge of waste) need to be managed sustainably.	1. Environment	Agreed, the definition has been edited on the basis of this submission.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
113.1	Lionel Hartle	Western Cape Provincial Treasury	SDF does not indicate how the anticipated water shortage will be confronted eg rain water harvesting, use of grey water etc.	1. Environment	Policy 26 has been edited to address this concern, within the parameters of the CT SDF. A number of other Departments within the City are responsible for protecting and managing water resources.
124.02	Mowzer Abraar	Dept of Water Affairs	Water conservation and demand management not given enough attention in SDF More attention should be given to waste treatment works and the capacity of existing bulk infrastructure to carry additional load especially in rapidly developing areas Water conservation and demand management not given enough attention in SDF.	1. Environment	The CT SDF is a spatial plan which focuses specifically on spatial strategies. Refer to policy P30. Comment passed on to water dept.
125.03	Leona Bruiners	PGWC: Rural Development & Land Reform	More attention should be given to Water and water quality and food security	1. Environment	The CT SDF is a spatial plan which focuses specifically on spatial strategies. Refer to policy P30. Comment passed on to water dept.
125.3	Leona Bruiners	Rural Development and Land Reform	More attention should be given to Water and water quality and food security	1. Environment	The CT SDF is a spatial plan which focuses specifically on spatial strategies. Refer to policy P30. Comment passed on to water dept.
170.04	Willie van der Westhuizen	Rod McPhail (Member of the WCPDF)	The following proposal should be deleted: <i>"A critical mass of agricultural land must be preserved in farm areas and around historic homestead in order to ensure sustainable operation of agricultural activities"</i> . City planners do not have the skills and expertise to understand agriculture or the economics of agriculture. The Dept of Agriculture "is well able to give input into what is sustainable and what is not, and NEMA can deal with historic homesteads".	1. Environment	Agricultural criteria alone cannot be used to determine the fate of the city's agricultural assets. The management and protection of agricultural areas bordering on any major metropolitan area is complex and involves many considerations as outlined in the 2008 Agricultural Review study. Many of these considerations are of a spatial planning nature rather than of a purely agricultural nature. For instance, agricultural areas in the city area play an important role in maintaining the city's heritage and character, tourism, recreation and job creation in addition to the agricultural activities taking place. The way that agricultural areas spatially relate to other land uses is also important.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
72.1	Anine Trumpelman	@Planning	Refers to Cape Farm 609-06 Philippi. The entire block of land bounded by Lansdowne Rd, Vanguard Drive and Duinefontein Road has been indicated as a wetland on the SDF. This designation is incorrect as it does not take into consideration existing zoning, guide plan and permitted uses and actual wetland status of the land.	1. Environment/ mapping	Noted and plan has been corrected.
72.11	Leona Bruiners	PGWC: Rural Development & Land Reform	Propose inclusion of agricultural management plan in policy 22 and inclusion of land reform initiatives to enable small black emergent farmers participation in urban agricultural initiatives.	1. Natural environment	Author provides insufficient detail on nature of proposed agricultural management plan to warrant its inclusion in the CTSDf. We believe that from a land use management perspective, the CTSDf gives adequate consideration to both agriculture and land reform under policies P28 and P38 (see revisions thereto).
Comment Theme: The Movement System					
5.2	Yonela Gxasheka		Trains in white areas efficient and punctual, but always delays in other areas	2. Movement	The City is not responsible for operation of rail service, this is a responsibility of PRASA. This comment is beyond scope of CTSDf.
5.3	Yonela Gxasheka		Want a more efficient, non-racist transport strategy	2. Movement	Disagree with author. The CTSDf transport strategy is intended to provide a movement system that provides all Capetonians with convenient and affordable access.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
6.1	Prof Susan Parnell	Dept Env & Geogr Sciences, UCT	Transport issues: Need to show Chapman's Peak Rd; Non motorized routes not shown; objection to High Level Hout Bay Road shown as a proposed connector.	2. Movement	The authors comment will be addressed in 3 parts (1) Chapmans Peak Road is shown (see Map 5.1) (2) The CTSDf is applicable at a city wide scale. The detail raised by the author is beyond the scope of the framework - NMT routes will be shown on district / local level plans (3) The Hout Bay By-Pass will improve access between Hout Bay and Constantia, Wynberg and eastern suburbs, relieving increasing congestion on Hout Bay Road from Constantia Nek down into Hout Bay. The principle reason in support of this proposal, however, is the high danger posed by the existing road where it winds steeply downwards and then between historical oak trees. This has been the scene of many accidents, and also vehicular break-downs. It also has little or no room for any NMT. This bypass is a proclaimed road area, is on the Integrated Transport Plan and engineering design has been completed.
9.1	Prof Susan Parnell	Dept Env & Geogr Sciences, UCT	Repeat - Objects to inclusion of Hout Bay High Level Road as a proposed connector route from Constantia Neck to Hout Bay	2. Movement	<p>The Hout Bay By-Pass will improve access between Hout Bay and Constantia, Wynberg and eastern suburbs, relieving increasing congestion on Hout Bay Road from Constantia Nek down into Hout Bay. The principle reason in support of this proposal, however, is the high danger posed by the existing road where it winds steeply downwards and then between historical oak trees. This has been the scene of many accidents, and also vehicular break-downs. It also has little or no room for any NMT. This bypass is a proclaimed road area, is on the Integrated Transport Plan and engineering design has been completed.</p> <p>However, this proposal, although considered necessary in the longer term, is not considered to be critical to the movement network and public transport orientated movement in particular. Therefore implementation is supported only in the medium to longer term.</p>

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
21.1	Jonathan Hobday	Rosebank & Mowbray Civic Assoc	Klipfontein Rd wrongly indicated on map - should only be eastwards of Milner Rd.	2. Movement	Klipfontein road is correctly identified as a development route on Map 5.1. The other maps referred to by the author do not designate the route as a development route - they merely indicate the hierarchical importance of road network. Author directed to key / legend on these maps.
24.2	Christo Kannenberg	Planning Partners	Main mobility routes already function as a grid except for the N2. Impression that the N2 s to be eliminated eventually ie waste of infrastructure. Need a plan showing full IRT and movement network.	2. Movement	Authors suggestion considered - see revised Ch 4.4. Authors impression to 'eliminate N2' unfounded. Whilst the trunk routing of phase 1a is indicated on the revised CT SDF (refer Map 5.1), future phases of the IRT network have a draft status and for this reason could not be indicated on the CT SDF.
52.1	Sisa Moboza	PRASA Cres (Corporate Real Estate Solutions)	Railway stations should be regarded as areas of intensive urban activity including a range of facilities and land uses. Supports the integration of land use and transportation planning. Submitted 'Guidelines for development around PRASA stations : Input into the draft CT SDF'. Also submitted : Proposed Land Use Management Policy for Stations.	2. Movement	Authors submission received and considered. The level of detail provided in these documents is largely beyond the scope of the CT SDF. The CT SDF identifies railway stations as points of high accessibility which should be supported by medium - high intensity land uses (refer P10.2 and section 5.2.5).
54.4	Mark Schafer	Bergvliet-Meadowridge RPA	Need to consider a transportation link between the Southern Peninsula and the South East metropole.	2. Movement	The Philippi Horticultural Area is a significant barrier between the Metro South East and District H. Lansdowne Road and the Steenberg Road and R300 extensions are identified on the CT SDF as important linkages between District H and the Metro South East.
54.41	Leona Bruiners	PGWC: Rural Development & Land Reform	More detail requested on corridors and CBD's - illustrate 5.1 graphically and include width to support span.	2. Movement	Author referred to revised CT SDF see figures 3.7, 3.8 and Map 5.2.
74.1	Stef Naude	HHO Africa	Comments relate to the proposed multidirectional accessibility grid concept. While the movement pattern is predominantly radial, it is not exclusively so. It is not accurate to present a binary analysis. Various specific edits suggested.	2. Movement	Authors suggestion considered - see revised Ch 4.4.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
74.2	Stef Naude	HHO Africa	Linear developments along 'high streets' owned by small individual owners are not a common pattern any more, and it is not clear what controls and incentives would be successful in realizing the linear activity route prototype. Activity routes are a idealized structuring element in spatial planning discourse but have mixed success in practice. Need for a through analysis of reasons for this and required mechanisms to overcome obstacles to success.	2. Movement	Authors suggestion noted. Cape Town's historic 'corridor's' remain significant employment generators (refer figure 3.8) and should therefore be protected and encouraged to develop further. The CTSDf puts in place an integrated and multi-faceted strategy to contain growth and encourage intensification along key routes (the accessibility grid). It is anticipated that improvements in public transport (IRT system) will attract a wealthier market share of public transport users along key corridors, which would in turn incentivise investment around public transport interchanges / facilities over the medium-long term.
74.3	Stef Naude	HHO Africa	Need to consider an alternative conceptual framework where mobility is viewed as a subset of accessibility, and enhancing it does not necessarily negatively impact on accessibility.	2. Movement	Authors suggestion considered - see revisions to Ch 4.4.
74.4	Stef Naude	HHO Africa	To restrict developments adjacent to higher order roads ie freeways and expressways to certain types of land uses (manufacturing and industrial) (box on p29) is not practical or desirable.	2. Movement	Authors suggestion considered - see revisions to Ch 4.4.
74.5	Stef Naude	HHO Africa	It is not clear how the activity and development corridors as primary constituents of the MAG relate to a functional road hierarchy, nor to the planned future transportation network of the city.	2. Movement	Authors concern noted - see revisions to Ch 4.4, inclusion of table 5.3 and revisions to Appendix c(ii).
74.6	Stef Naude	HHO Africa	As with the existing rail corridors, IRT corridors should be clearly identified as they represent significant investments in public transport, which are likely to attract far greater private sector response than simply a public transport route.	2. Movement	Authors concern noted. Whilst the trunk routing of phase 1a is indicated on the revised CTSDf (refer Map 5.1), future phases of the IRT network have a draft status and for this reason could not be indicated on the CTSDf. A set of spatial planning guidelines has been compiled to inform the future routing of the IRT (refer P10). In addition, the CTSDf identifies IRT stations as points of high accessibility which should be supported by medium - high intensity land uses (refer section 5.2.5)

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
77.04	Marco Geretto & Masilonyane Mokhele	NM Associates Planners & Designers	Accessibility Grid: too much focus on grid but with limited understanding. SARCC proposal for Chempet rail.	2. Movement	Authors comment noted and discussed internally. Chempet rail proposal does not feature on City Rail Framework (draft, 2011). The City is responsible for intermodal transport planning, not SARCC.
77.06	Marco Geretto & Masilonyane Mokhele	NM Associates Planners & Designers	Airports: Noise contours for 2nd runway are available. Need contours for Ysterplaat	2. Movement	The 2nd runway at CTIA has not been statutorily approved. Whilst map 5.4 indicates existing noise cones, P24.2 makes provision for future runway realignment and/or runway construction, subject to obtaining the necessary approvals, causing a shift in the airport noise cones. Ysterplaat height restrictions indicated on CTSDf map 5.3. No contours are available
77.07	Marco Geretto & Masilonyane Mokhele	NM Associates Planners & Designers	Corridors / Dev routes: (2.3) Difficult to id on maps. Need better articulation on what constitutes healthy urban activity on route. Some identified even though not conducive to public transport.	2. Movement	Difficult to tabulate as the route designations are not along entire roads - thus mapping is ideal way to represent routes. The designations will be provided on District Plans which will show a 'zoomed in / closeup' at a larger scale. Refer to revised section 4.4, table 5.3 and appendix C(ii).
77.08	Marco Geretto & Masilonyane Mokhele	NM Associates Planners & Designers	Routes: fig 5.5 not realistic for SA (land values mostly to low) Route: greater commitment to completion of Blue Downs Rail ext required Routes: Why no north-south IRT route recommended to connect SE to industrial areas in core and north Routes: fig 5.5 not realistic for SA (land values mostly to low).	2. Movement	The CTSDf is >20 year plan. The CTSDf presents idealised concepts as a vision to strive towards. The City prioritised the Blue Downs rail link in the City's rail framework in 2006 - the infrastructural investment is a responsibility of PRASA. The planning for future phases of the IRT will address the link between the south east and core (see Map 7.2).
77.1	Marco Geretto & Masilonyane Mokhele	NM Associates Planners & Designers	Trans P13: needs to be more specific regarding pedestrian prioritisation	2. Movement	The policy statement P13 reads: "Include walking and cycling as essential..." which is considered to be sufficient emphasis on pedestrian prioritisation. See also the Policy Guidelines P13.1. The planning for future phases of the IRT will address the link between the South East and Cor (see Map 7.2)
77.11	Marco Geretto & Masilonyane Mokhele	NM Associates Planners & Designers	Eco Trans P16: retail planning is too weak/not mentioned	2. Movement	Authors comment noted and discussed internally. Retail developments are addressed in policy 3 and 16.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
85.05	Rod Gurzynski	Kommetjie Residents & Ratepayers Association	Routes: 6.1 Development route (Fig 5.5 shows 4-6 lanes) would be inappropriate for Kommetjie Road	2. Movement	Development routes are characterized by nodal type development at key intersections. Thus this designation does not necessarily imply continuous high-intensity development. Mixed-use development is already occurring at the identified nodes (Long Beach, Masiphumelele, & Ocean View) . The district plan provides more detailed sub-area management guidelines which are intended, for example, to restrict internodal areas to residential use.
86.09	Geoff Neden	Far South Peninsula Community Forum	Routes: 6.1.3 Four-lane highways (along activity/development routes) won't encourage public transport/cycling. Concern that Kommetjie Rd has been downgraded from a scenic to a development route Routes: 6.1.3 Four-lane highways (along activity/development routes) won't encourage public transport/cycling.	2. Movement	The illustrations are notional - the CTSDf supports land use intensification along public transport routes subject to context (refer P22). The emphasis on public transport will result in greater pedestrian movement and cycling. It must be noted that development routes tend exhibit different characters and do not represent a uniform mix and density of land uses along their length. Development routes are characterised by nodal type development at key intersections - mixed-use development is already occurring at the identified nodes (Long Beach, Masiphumelele, & Ocean View). The western alignment of Kommetjie Road is identified as a scenic route (refer map 5.8)
86.1	Geoff Neden	Far South Peninsula Community Forum	Peninsula Urban Structure Plan remains relevant. Kommetjie Rd not shown as a development route in this document	2. Movement	The Peninsula structure plan is outdated and did not classify needs according to their land use functionality. The CTSDf will withdraw and replace this document.
95.25	Gavin Smith	Greater Cape Town Civic Alliance	The planning process itself has been institutionalized and does not include all the best green practice principles. CT is not just any city. Beauty is its main feature and this must not be compromised by "activity routes." NB how this articulates with the zone scheme	2. Movement	Activity routes and "beauty" are not necessarily mutually exclusive. Concentrating employment opportunities and medium - higher density development along corridors will provide thresholds necessary to sustain public transport and reduce the City's expansion into areas of agricultural importance and natural beauty.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
95.46	Gavin Smith	Greater Cape Town Civic Alliance	We are concerned that there is no clarity in the CTSDf with regard to the development of a second port, nor with regard to the development of a second airport.	2. Movement	The CTSDf is a proactive planning tool. In the absence of detailed information, the CTSDf makes certain statements to protect the interests of the public and provide clarity to State Owned Enterprises. In addition, the City is engaging regularly with representatives from TRANSNET and ACSA. See P17 & P18
95.54	Gavin Smith	Greater Cape Town Civic Alliance	P9 - Relationship between City & PRASA needs to be improved	2. Movement	The City meets regularly with PRASA representatives (Rail Steering Committee). The City's position on rail service planning and operations is documented in the City's Rail Framework and Integrated Transport Plan.
95.55	Gavin Smith	Greater Cape Town Civic Alliance	P10 Lighter, more efficient rail systems of the kind on the Gautrain routes should be introduced. The city is presently in no position to provide rail transport, and is unlikely in the near future to obtain national support to make this possible.	2. Movement	The City's position on rail service planning and operations is documented in the City's Rail Framework and Integrated Transport Plan.
95.56	Gavin Smith	Greater Cape Town Civic Alliance	P11 - Too little attention is being given to parking for commuters at bus stations.	2. Movement	Authors suggestion considered - see revised policy statement P13, P14
95.57	Gavin Smith	Greater Cape Town Civic Alliance	P12 - We agree that lighter, more efficient rail systems of the kind on the Gautrain routes should be introduced.	2. Movement	The City's position on rail service planning and operations is documented in the City's Rail Framework and Integrated Transport Plan.
95.58	Gavin Smith	Greater Cape Town Civic Alliance	P13 - There is an enormous need for cycle and pedestrian routes to and from transport interchanges. Also the routes must be safe and well maintained. Too much attention is currently being given to new areas, not enough to areas which for example have had cycle routes which are not safe and are not well maintained.	2. Movement	Authors suggestion considered - see revised policy statement P13, P14
95.59	Gavin Smith	Greater Cape Town Civic Alliance	P14 - Will not succeed without public parking for commuters at transport interchanges	2. Movement	Authors suggestion considered - see revised policy statement P13, P14
95.6	Gavin Smith	Greater Cape Town Civic Alliance	P16 - We are concerned that there is no detail under Means/Required in this regard. We need to know whether this will mean encroachment of industrial and commercial uses into what are currently residential areas. Possibility of encroachment of industrial and commercial uses into residential areas is unacceptable.	2. Movement	The CTSDf supports land use intensification along major public transport routes in line with national statutes and approved provincial planning frameworks (PSDF, 2009). In the CTSDf, policy 22 has been revised and provides specific guidance regarding land use intensification.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
95.61	Gavin Smith	Greater Cape Town Civic Alliance	P17 - Supported but unclear with regard to the actual need for a second airport	2. Movement	The CT SDF is a proactive planning tool which responds to the available knowledge and information. The Airport Systems Study (2001) describes the rationale for a secondary airport. The CT SDF statements are intended to protect the interests of the public and provide clarity to State Owned Enterprises. In addition, the City is engaging regularly with representatives from TRANSNET and ACSA.
96.25	Simon Liell-Cock	Far South Peninsula Community Forum	The proposed Development Route and Nodal Developments along Kommetjie Road are totally inappropriate and must be taken out of the SDF. Impose strict control of activities on all the Service Industrial sites along Kommetjie Road and Lekkerwaterweg. Cottage industries and urban agriculture should be encouraged in the last remaining smallholdings of what was once an extensive farming area. As the smallholdings are conveniently in close proximity to the Waste water treatment works at Wildevoelplei, the nutrient rich effluent could be used for irrigation purposes instead of being discharged into the vlei which has once again become hypertrophic. If the stated objective of sustainability is to be realized, planning will have to adjust to being far more creative regarding natural resources than proposing development corridors in vulnerable eco-sensitive areas. With some political will and a public process, Kommetjie Road could and should be restored to a Scenic Route again	2. Movement	The authors comment will be addressed in 3 parts: (1) the CT SDF supports land use intensification along public transport routes subject to context (refer P22) (2) Development routes are characterised by nodal type development at key intersections - mixed-use development is already occurring at the identified nodes (Long Beach, Masiphumelele, & Ocean View) - the district plan provides more detailed sub-area management guidelines which are intended to restrict internodal areas to residential use and restrict industrial development to light industrial related activities in the designated industrial areas, whilst bona fide, low impact, working from home practices are strongly encouraged, with larger scale businesses operating within and being directed towards the Fish Hoek and Sun Valley nodes(3) Western alignment of Kommetjie road is identified as a scenic route (refer map 5.8)
97.1	Daniel Walden		It is very encouraging to see that forward thinking is going in to the future of our city. Planning must consider the needs of the poor - the rapid transport system is a great idea, coming complete with flower beds and sprinkler systems – should we not rather be using our money for addressing needs prevalent in informal settlement communities rather than planting flower beds?	2. Movement	Authors concern noted. National policy directives require that quality public spaces (i.e. landscaped) are provided in Integrated Rapid Public Transport Network reserves. Phase 2 of the IRT is intended to service the Metropolitan South East sector.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
101.2	Liz Brunette	Constantia Hills Residents Association	The severe east-west movement constraint south of the city centre needs to be recognised in the SDF, from Hout Bay and the deep south to Mitchells Plain, Khayelitsha and Somerset West.	2. Movement	The Philippi Horticultural Area is a significant barrier between the Metro South East and District H. Lansdowne Road identified on the CTSDf as important linkages between District H and the Metro South East. The future phases on the IRT will provide this mobility connection.
101.23	Liz Brunette	Constantia Hills Residents Association	Policy 9; add a new bullet "improved road links with District H/8"	2. Movement	The Philippi Horticultural Area is a significant barrier between the Metro South East and District H. Lansdowne Road identified on the CTSDf as an important linkages between District H and the Metro South East.
101.3	Liz Brunette	Constantia Hills Residents Association	The southern corridor does not provide a mobility alternative to access Bellville and Somerset West from the area south of Wynberg. As a result commuters have to travel along the M3 to connect with the N2, which is inefficient.	2. Movement	The Philippi Horticultural Area (PHA) is a significant barrier between the Metro South East and District H. Lansdowne Road and the Steenberg Road and R300 extensions are identified on the CTSDf as an important structural linkages between District H and the Metro South East. The future phases on the IRT will provide this mobility connection. The other proposal includes a railway line north of the PHA - these are indicated on map 5.1
101.4	Liz Brunette	Constantia Hills Residents Association	The Metro southeast is identified as an area that requires economic opportunities but it is not linked to the southern corridor south of Wynberg in terms of mobility.	2. Movement	The Philippi Horticultural Area (PHA) is a significant barrier between the Metro South East and District H. Lansdowne Road and the Steenberg Road and R300 extensions are identified on the CTSDf as an important structural linkages between District H and the Metro South East. The future phases on the IRT will provide this mobility connection. The other proposal includes a railway line north of the PHA - these are indicated on map 5.1

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
101.5	Liz Brunette	Constantia Hills Residents Association	The area from Muizenberg to Fish Hoek identified for land-use intensification is primarily residential, and is limited by the Main road, railway line and sea on the eastern side and the mountain slopes to the west. It is also vulnerable as a result of climate change. Retail and tourism opportunities beyond the existing footprint are not aesthetically suitable nor practical given the enormous tourism attraction of the strip of developed land. This strip is not suitable for commercial, retail and industrial intensification and should not be identified in this map.	2. Movement	The area from Muizenberg to Fishhoek is an essential component of the Accessibility Grid and is supported by immediate accessibility to the southern suburbs railway line. The CT SDF supports land use intensification along public transport routes, especially rail, in line with national statutes and approved provincial planning frameworks (PSDF, 2009). It must be noted that activity routes can exhibit different characters and do not represent a uniform mix and density of land uses along their length. This route is not anticipated to change dramatically in character due to land ownership and entrenched residential uses. Policies P39 and P40 have been revised and provide specific guidance regarding land use intensification taking into consideration authors concerns regarding tourism potential.
101.7	Liz Brunette	Constantia Hills Residents Association	Add another priority action area "Woodstock, Salt River, Observatory" under 6.1.4	2. Movement	Authors concern taken into consideration, the EOZ management plan will determine the precise areas / boundaries that are priorities i.t.o. urban regeneration.
102.22	Alan Jackson	Greater Lynfrae Civic Association	With regards activity and development routes, whilst the notion is supported, we are concerned about the extent to which the City intends to encroach into existing residential areas in order to do these things. In this regard intensive consultation needs to be undertaken with regard to proposed changes.	2. Movement	The CT SDF supports land use intensification along public transport routes in line with national statutes and approved provincial planning frameworks (PSDF, 2009). In the CT SDF, policies P22, P39 and P40 has been revised and provide specific guidance regarding land use intensification.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
102.27	Alan Jackson	Greater Lynfrae Civic Association	P9 & P10 - While we agree that this is necessary, we have learned that there is insufficient co-operation between the City and PRASA, and if it continues, this will not be possible. We have been told by the city's Transport Department that the city intends to take over the management of the rail service in the city. Although we understand the frustrations which lead to this thinking, and we agree that lighter, more efficient rail systems of the kind on the Gautrain routes should be introduced, the city is in no position to do so, with the human resource base it has at present. Greater Co-operation between PRASA and the city is therefore essential.	2. Movement	The City meets regularly with PRASA representatives (Rail Steering Committee). The City's position on rail service planning and operations is documented in the City's Rail Framework and Integrated Transport Plan.
102.28	Alan Jackson	Greater Lynfrae Civic Association	Too little attention is being given to parking for commuters at bus stations, and without this we will not succeed.	2. Movement	Authors suggestion considered - see revised policy statement P14
102.29	Alan Jackson	Greater Lynfrae Civic Association	P-13 Cycle and pedestrian routes to and from transport interchanges are needed, if we are to encourage those who do not have vehicles to use public transport. If we are to promote the use of bicycles, secure storage facilities for bicycles need to be provided at train and bus stations. Also the routes must be safe and well maintained. Too much attention is currently being given to new areas, not enough to areas which for example have had cycle routes which are not safe and are not well maintained	2. Movement	Authors suggestion considered - see revised policy statement P13, P14
102.3	Alan Jackson	Greater Lynfrae Civic Association	P14 – Too little attention is being given to public parking for commuters at transport interchanges, and without this the city will not succeed in encouraging the use of public transport.	2. Movement	Authors suggestion considered - see revised policy statement P14

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
102.31	Alan Jackson	Greater Lynfrae Civic Association	P16 – We are concerned that there is no information under Means/Required in this regard. We need to know, for example, whether this will mean encroachment of industrial and commercial uses into what are currently residential areas, and if so, how far into residential areas this use will encroach.	2. Movement	The CT SDF supports land use intensification along public transport routes in line with national statutes and approved provincial planning frameworks (PSDF, 2009). In the CT SDF, policies P22, P39 and P40 has been revised and provide specific guidance regarding land use intensification.
102.32	Alan Jackson	Greater Lynfrae Civic Association	P17 – We support these plans in general but while we are very encouraged by the plans to utilise a significant part of Ysterplaat for mixed use development, and to move aviation way from Fisantekraal and make development possible here also, we are concerned that such planning remains unclear in a CT SDF, which ought to be much clearer in this regard. We are concerned that planning for a second airport remains unclear in a CT SDF, which ought to be much clearer in this regard.	2. Movement	The CT SDF is a proactive planning tool which responds to the available knowledge and information. The Airport Systems Study (2001) describes the rationale for a secondary airport and proposed a site south east of Atlantis - this is indicated conceptually on the CT SDF maps.
102.33	Alan Jackson	Greater Lynfrae Civic Association	P18 – While we support these plans in general, we are concerned that given the poor relationship between the City and PRASA, issues around rail will be difficult to overcome.	2. Movement	The City meets regularly with PRASA representatives (Rail Steering Committee). The City's position on rail service planning and operations is documented in the City's Rail Framework and Integrated Transport Plan. The City is not responsible for operation of rail service, this is a responsibility of PRASA. This comment is beyond scope of CT SDF.
102.7	Alan Jackson	Greater Lynfrae Civic Association	There is a lack of clarity about if and where a second Airport will be developed (Point 3.1.3 of the CT SDF)	2. Movement	The CT SDF is a proactive planning tool which responds to the available knowledge and information. The Airport Systems Study (2001) describes the rationale for a secondary airport and proposed a site south east of Atlantis - this is indicated conceptually on the CT SDF maps.
103.12	Patrick Dowling	WESEA	With regards the ITP's objective to reduce the number of vehicles on the road, the CT SDF proposes to include more development and activity corridors which presumably will accommodate more vehicles – there is thus an anomaly in the CT SDF;	2. Movement	Disagree with author, increasing land use intensity will establish thresholds required for public transport and stimulate multidirectional movement patterns which will make public transport provision more cost effective. The CT SDF establishes an integrated land use and transport planning framework which is aligned with the ITP.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
103.25	Patrick Dowling	WESEA	Development and Activity routes do not relate to stated concerns about energy, climate change, oil, NMT etc.	2. Movement	Increasing land use intensity along corridors will establish thresholds required for public transport and stimulate multidirectional movement patterns which will make public transport provision more cost effective, efficient and sustainable. The 'compact city' and 'transport orientated development' approach advocated by the CT SDF in form of activity routes and development routes is based upon addressing concerns regarding energy, climate change, oil, NMT. To state the opposite is simply not true.
105.1	Patrick Dowling	Kommetjie Residents & Ratepayers Association	Support precautionary approach w.r.t. resource capacity. Activity corridor approach inappropriate in this context.	2. Movement	Increasing land use intensity along corridors will establish thresholds required for public transport and stimulate multidirectional movement patterns which will make public transport provision more cost effective, efficient and sustainable. The 'compact city' and 'transport orientated development' approach advocated by the CT SDF in form of activity routes and development routes is based upon addressing concerns regarding energy, climate change, oil, NMT. To state the opposite is simply not true.
105.2	Patrick Dowling	Kommetjie Residents & Ratepayers Association	Graphic representation of what an activity route would look like on Kommetjie Road is entirely unacceptable for what is regarded elsewhere in the document as a destination in an area many regard as pleasantly rural	2. Movement	Authors concern noted - see revision to Map 5.1
106.5	Yachita Reddy	Sustainable Energy Africa	P17: Air transport cannot be an expanding transport mode in the medium and long term due to carbon constraints. Effort in expanding this and associated industries needs to be urgently revised.	2. Movement	Authors comment noted for discussions with ACSA and detailed studies regarding need for secondary airport. Author referred to Airport Systems Study (2001).
112.3	Corlia Coetser		Critical to establish a transport corridor between the Helderberg and the CBD of Cape Town and not simply from the Airport to the CBD. Need for integrated transport planning.	2. Movement	Authors concern noted. Airport to CBD IRT link was a first phase FIFA requirement. The subsequent phases of City IRT network will be implemented in line with the approved IRT Business plan. Integrated transport planning is advocated by the CT SDF (refer 6.1.4)

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
115.1	Mrs Martheze	Road Network Management	Department of Transport and Public Works is the road authority of the provincial road network provided and provides funding for the upgrading and maintenance of the existing proclaimed road network within the City of Cape Town in terms of the Roads Ordinance, 1976, (Ordinance 19 of 1976, as amended) and, in terms of the Urban Transport Act, 1977, (Act 78 of 1977, as amended), for the upgrading and maintenance of the existing Cape Metropolitan Road Network. It is the province's expectation that the City of Cape Town protects the mobility and operational integrity of the abovementioned road networks to sustain and promote the economic development in and around the municipality.	2. Movement	Authors comment considered in redrafting of the CT SDF and discussed with City Transport officials and Transport Network Infrastructure Development (TNID) Dept.
115.1	Mrs Martheze	Road Network Management	This Branch needs clarification regarding the proposed route designation system (7.2 Route Designation: Land use functionality page 70 and Appendix C(ii)) of the proposed accessibility grid with its associated land use functions. It is not clear if it is meant to replace the road classification of major roads of the City of Cape Town for land use management purposes or run in parallel as a duplicate system.	2. Movement	The route designation does not replace the City's Hierarchical Road Network Classification System, nor is it intended to run in parallel as a duplicate classification system. Authors comment considered in redrafting of the CT SDF and discussed with City Transport officials and Transport Network Infrastructure Development (TNID) Dept. Author directed to revisions to Ch 4.4, inclusion of table 5.3 and revisions to Appendix C(ii).

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
115.11	Mrs Martheze	Road Network Management	The City of Cape Town Road Network Hierarchical Classification System was approved by the Premier (Administrator) in terms of the Urban Transport Act 1977 (Act 78 for 1977) whereas the proposed route designation system/terms of the 'accessibility grid' would be only legally acceptable within the approved CTSDf. The Cape Metropolitan Road Network, a legally accepted road network classification system, is vital when land use and development management is practiced. This is especially true when Traffic Impact Assessments are performed and The Road Access Guidelines are used to motivate and assess potential applications for land use changes.	2. Movement	Authors comment considered in redrafting of the CTSDf and discussed with City Transport officials and Transport Network Infrastructure Development (TNID) dept. The City of Cape Town Road Network Hierarchical Classification System, together with the Road Access Guidelines (PGWC, 2001), will continue to manage competing demands between mobility and accessibility in the evaluation of development applications to change / enhance land use rights. Author directed to revisions to Ch 4.4, inclusion of table 5.3 and revisions to Appendix C(ii).

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
115.12	Mrs Martheze	Road Network Management	<p>It is not clear how the route designations, Activity routes and Development routes, correlate with the mobility functions of the road classification, Secondary arterial and Primary Arterial, as stated in Table C.1, Appendix C(ii). This Branch is concerned that the mobility functions of these roads would be thus compromised if the correlation relationship is arbitrary assigned in the CTSDf. The provisor indicating that the City's Road Network Classification system will continue to inform planning and the assessment of applications in Appendix C(ii) is not supported, as the new "multidirectional accessibility grid" has not been tested and no status, it infers that the Metropolitan Road Network is no longer relevant and the requirements of the Integrated Rapid Transport System and the Nuclear Evacuation requirements appear not to have been considered:</p>	2. Movement	<p>The designation of routes for improved land-use and transport integration are not new concepts. A similar exercise was undertaken in the MSDF, 1996. The MSDF, 1996 included Activity Corridors, Activity Spines and Activity Streets as route designations (not classifications). Notwithstanding the above, the authors comment was considered in redrafting of the CTSDf and discussed with City Transport officials and Transport Network Infrastructure Development (TNID) Dept. The relationship between the CTSDf Route Designation, DoT's road classification system, the PSDF (2009) and the Cape Town's Road Network Hierarchical Classification System, is generally indicated on Table C.1, providing a general indication of the types of relationships existing between road classification systems and their land use functionality. It is important to note that the route designation does not replace the City's Hierarchical Road Network Classification System, nor is it intended to run in parallel as a duplicate classification system. The City's Road Network Hierarchical Classification system will continue to determine road network planning, classification and the mobility / accessibility function. The City of Cape Town Road Network Hierarchical Classification System, together with the Road Access Guidelines (PGWC, 2001), will continue to manage competing demands between mobility and accessibility in the evaluation of development applications to change / enhance land use rights. Author directed to revisions to Ch 4.4, inclusion of table 5.3 and revisions to Appendix C(ii).</p>

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
115.3	Mrs Martheze	Road Network Management	Section 1.2 - As much of the growth and development is based on the provision and support of the proclaimed road network, the inclusion of Integrated Transport Planning policies, goals and objectives within the SDF is essential.	2. Movement	Authors attention directed to Appendix B which shows relationship between City sector policies to CTSDf. In addition, national transport legislation and City ITP is cross referenced in numerous places in the CTSDf, see P10 and section 2.2.
115.6	Mrs Martheze	Road Network Management	Proposal to establish a Multidirectional Accessibility Grid not supported - recommends the Cape Metropolitan Road Network and the Integrated Rapid Transport System be acknowledged and included in the CTSDf as integral components to promote the future growth of the City of Cape Town. Not mentioned in the CTSDf is the role of the Integrated Rapid Transport System the proposal to create a grid-based movement system, as shown graphically (albeit conceptually) does not necessarily correlate to the proposed Integrated Rapid Transport network acts to reinforce the radial nature of travel from the CBD although feeder services are being planned to provide the circumferential links between these radial feeders. This will achieve a hierarchical, multi-directional coverage of the City of Cape Town, as proposed in the new "multidirectional accessibility grid" on the current Metropolitan Road Network	2. Movement	Authors concern noted - see revisions to Ch 4.4, inclusion of table 5.3 and revisions to Appendix c(ii).
115.7	Mrs Martheze	Road Network Management	Section 5.4 – The multidirectional accessibility grid Transport plans must be developed so as to (b) direct employment opportunities and activities, mixed land uses and high density residential development into high density residential into high utilization public transport corridors interconnected through development nodes within the corridors, and discourage urban sprawl where public transport services are inadequate."	2. Movement	Authors notion supported by CTSDf.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
115.8	Mrs Martheze	Road Network Management	The CT SDF ignores the current Metropolitan Road Network and has attempted to introduce a new road network "to create a public transport-orientated equitable pattern of access". The current Metropolitan Road Network promotes the CT SDF policy priorities and no new "multidirectional accessibility grid" is required, as one already exists. The focus should be on maintaining the current transport system assets, protecting its various functions and integrity, balancing the competing objectives of accessibility and mobility and expanding and improving the transport system in tandem with the future development. The City of Cape Town needs its mobility routes to meet and sustain its society, due to its expanse, land use mixes and separation of activities and to protect its market competitiveness both internationally and nationally.	2. Movement	Authors concern noted. The CT SDF has been revised to conform with authors suggestion regarding 'supporting emergence of the grid' as opposed to introducing / creating a new network - see revisions to Ch 4.4, inclusion of table 5.3 and revisions to Appendix C(ii).
115.9	Mrs Martheze	Road Network Management	Mobility is a necessity in the time of a Nuclear Incident. The need to evacuate citizens within a certain time period cannot be disregarded. Mobility priority should be included into all new development taking place, especially along the north-south corridor between Cape Town and Saldanha Ports, where appropriate. Consideration should be given to the fact that there may be no electrical no power during such an incident and alternate energy sources may be required for traffic management purposes and public transport services.	2. Movement	Authors comment addressed in two parts (1) P24.4 reaffirms authors suggestion - 'All development within Koeberg Nuclear Power Station's (KNPS) exclusion zones (5km and 16km radius) must comply with the development controls in Table 5.6.' (2) Mobility needs and the need to ensure that the operational integrity of key routes is not unnecessarily compromised is reflected in the revised draft of the CT SDF - see revisions to Ch 4.4, inclusion of table 5.3 and revisions to Appendix C(ii).

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
123.01	Mafika Mkwanzazi	Transnet	Culemborg Salt River has been earmarked for development in support of growing port activities. Areas within interface zone are believed to be aligned to mixed port related light industrial uses. The accommodation of residential, recreational and commercial activities on the site, which are not related to the port's needs, is highly improbable.	2. Movement	Authors comment precedes findings of current study / framework for Culemborg and therefore considered speculative in nature.
123.02	Mafika Mkwanzazi	Transnet	Transnet's Belcon site currently serves as the Western Cape intermodal hub supporting the Gauteng – Cape Town rail corridor. The site is already optimally used for freight logistics, intermodal transfers, distribution, storage, repackaging as well as rail maintenance – and will furthermore have to accommodate any rail operations displaced by the redevelopment of the Culemborg / Salt River precinct. The sites limited footprint does not allow any other activities and the focus in future will be to further develop, as and when appropriate, to support the identified activities.	2. Movement	Authors comment precedes findings of current study / framework for Culemborg. By virtue of its extent and location, Belcon is a strategic site and its future development must be considered jointly with the City to ensure that, inter alia, an appropriate interface with surrounding uses is achieved.
123.03	Mafika Mkwanzazi	Transnet	Transnet not in a position to allocate portions of the Culemborg / Salt River and Belcon sites to alternative non-aligned uses which would conceivably compromise future land availability for core port logistics operations	2. Movement	Authors comment precedes findings of current study / framework for Culemborg. By virtue of its extent and location, Culemborg is a strategic site and its future development must be considered jointly with the City to ensure that, inter alia, an appropriate interface with surrounding uses is achieved.
127.1	Madika Mkwanzazi	Transnet	Culemborg Salt River has been earmarked for development in support of growing port activities. Areas within interface zone are believed to be aligned to mixed port related light industrial uses. The accommodation of residential, recreational and commercial activities on the site, which are not related to the port's needs, is highly improbable.	2. Movement	Authors comment precedes findings of current study / framework for Culemborg and therefore considered speculative in nature.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
127.1	Mafika Mkwanazi	Transnet	Transnet's Belcon site currently serves as the Western Cape intermodal hub supporting the Gauteng – Cape Town rail corridor. The site is already optimally used for freight logistics, intermodal transfers, distribution, storage, repackaging as well as rail maintenance – and will furthermore have to accommodate any rail operations displaced by the redevelopment of the Culemborg / Salt River precinct. The sites limited footprint does not allow any other activities and the focus in future will be to further develop, as and when appropriate, to support the identified activities.	2. Movement	Authors comment precedes findings of current study / framework for Culemborg. By virtue of its extent and location, Belcon is a strategic site and its future development must be considered jointly with the City to ensure that, inter alia, an appropriate interface with surrounding uses is achieved.
128.01	Gavin Kode	Old Mutual Property Investments	Express concern regarding potential for development in general pinelands area without commensurate investment in road and infrastructure.	2. Movement	All applications are evaluated on merit to assess the impacts on the receiving environment. Transport and Infrastructure are key components of this evaluation during the application process. Author referred to policy 22.
128.02	Gavin Kode	Old Mutual Property Investments	Express concern that recent applications for Athlone Power Station, Maitland Abattoir pre-supposed and efficient and reliable public transport system without a fixed and binding roll-out programme. Specific directives to be followed when public transport is required for future development is not clear. Requested that City elaborate on Policy 40 with reference to requirements for public transport, to overall transportation plan and which, if any component should be in place prior to city granting additional rights.	2. Movement	Public Transport provision is described in the City's Integrated Transport Plan (ITP). With regards spatial planning and transport planning, author referred to section 6.1.3 - 6.1.5. All applications are evaluated on merit to assess the impacts on the receiving environment. Transport and Infrastructure are key components of this evaluation during the application process.
133.02	Jane Meyer	Mouillepoint Ratepayers Association	The public transport function of Beach Rd should not be a justification for higher densities or taller buildings than permitted by the current zoning. Likewise, policy 28 should not be used as a justification for rezonings or departures that will result in taller buildings than permitted by the current zoning. This should be addressed in the SDF.	2. Movement	Concerns have been noted. Policy 22 has been amended to ensure appropriate densification and greater consideration of the character of specific areas.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
Comment Theme: Economic					
5.1	Yonela Gxasheka		Lack of employment opportunities, esp for people of colour	3. Economic	Agreed. This comment has been considered. The comment should be referred to the Economic Development Strategy team.
6.1	Prof Susan Parnell	Dept Env & Geogr Sciences, UCT	Why is Hangberg, Hout Bay indicated for mixed use/intensification? Plan indicates separate economic places that perpetuate apartheid	3. Economic	The mixed use/intensification does not cover the whole of Hangberg but rather relates to the existing industrial / back of harbour area. This comment is referred to the District Plan level.
8.1	Mike Hoffmeester	Bishop Lavis Outreach Forum	Bishop Lavis not included	3. Economic	Noted. This comment to be taken into consideration when developing the EOZ management plan
18.1	Graham Bath	Mouille Point Ratepayer's Assoc	SDF is silent on broadband infrastructure	3. Economic	Agree. Policy 2 has been amended accordingly
28.4	Luvuyo Mazuli		Fight poverty and crime	3. Economic	Agreed
35.3	Dr Koos Jonker		Weak on economic planning. Need to create jobs and skills training for less highly skilled. Refers to May 1992 CoCT Planner's report on creation of job opportunities.	3. Economic	This comment has been considered. The comment will be referred to the Economic Development Strategy team.
50.1	Andy Miles	Property Developers Forum	Economic development, especially job creation, needs more emphasis. The lack of development capital at affordable cost is the single biggest constraint on economic development and job creation.	3. Economic	This comment has been considered. The comment will be referred to the Economic Development Strategy team.
50.8	Andy Miles	Property Developers Forum	Need to acknowledge the free market and consumer / voter / resident preferences. Need least intervention from authority.	3. Economic	This comment is difficult to address as it is non-specific. Comment was considered.
54.2	Mark Schafer	Bergvliet-Meadowridge RPA	Business creep should not be permitted under the guise of policies 40 and 41. Exceptions would be residential properties which are situated on the periphery of residential areas or along main routes.	3. Economic	These policies have been amended so as to include references to appropriate locations, the area specific policy frameworks, and the careful consideration of land use changes at the interfaces of residential and mixed use areas.
70.5	Nlamleli Pukwana	Food & Allied Workers Union	SDF is particularly weak in addressing spatial inequality and restructuring. Remarkable resemblance to the MSDF.	3. Economic	This comment has been considered. Policy P1 does address this issue. The comment will be referred to the Economic Development Strategy team and taken into consideration in the drafting of the EOZ management plan.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
70.6	Nlamleli Pukwana	Food & Allied Workers Union	Not enough focus on suburbs of Langa, Athlone, Bonteheuwel, Gugulethu, the airport etc. as an area of concerted intervention.	3. Economic	Noted. This comment to be taken into consideration when developing the EOZ management plan
70.7	Nlamleli Pukwana	Food & Allied Workers Union	Unclear if there will be a concerted attempt to unlock the restructuring, economic and human development opportunities inherent in the coastal interface of certain townships eg khayelitsha and Mitchells Plain.	3. Economic	This comment has been considered. See Policies P7 and P50
76.08	Ns S.A Sharpe	Barbarossa Residents Group	EOZ: Should not(??) be identified by agreed upon principals and not under pressure from developers	3. Economic	Agreed. This was the case. Mapping amended to show EOZs
76.09	Ms S.A Sharpe	Barbarossa Residents Group	More attention should be given to sustainability (sec 6.2.7)	3. Economic	Policy P30 & 31 have been combined as Policy 30 and edited to address this concern
77.05	Marco Geretto & Masilonyane Mokhele	NM Associates Planners & Designers	Nodes: Need to be more specific about roles. Concerns raised about selection/defn of nodes. Need to support underperforming nodes along urban core. Urban core also high risk infrastructure and slow to redevelop. Blue Downs CBD, Airport, Strand & Durbanville nodes needs more emphasis. Lack of clarity on CT CBD.	3. Economic	This comment to be taken into consideration when developing the EOZ management plan
77.09	Marco Geretto & Masilonyane Mokhele	NM Associates Planners & Designers	Employment: employment in SE needs to be priorities over development at Atlantis. Need to address dormitory nature of Grassy Park, Lotus R, Parkwood area Economic: P2: should focus more on nodal than strip development. Should map EOZ, IDZ and UDZ Eco P3.1 Need to relax zoning to facilitate informal bus in SE. Are there possibilities for "Inclusionary businesses policy" and incentives?	3. Economic	Noted. This comment to be taken into consideration when developing the EOZ management plan. EOZ's have been mapped
77.12	Marco Geretto & Masilonyane Mokhele	NM Associates Planners & Designers	Urban Agriculture P22 not seen as a priority	3. Economic	The importance of urban agriculture is recognised and the third bullet in Policy P28 under the column 'what this means and requires' indicates this
86.05	Geoff Neden	Far South Peninsula Community Forum	Eco: Under emphasis of economic value tourism (4.4.1 on pg25, table 8.2 and 8.1 on pg74) Eco priority action areas should include tourism. Need better statistics on tourism.	3. Economic	Noted. Amendments have been made to various policies, Table 8.2 and mapping to correct this.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
90.01	Mark Noble	V&A Waterfront Development Department	P16, Diagram (Map?)6.2: V&AW & CBD should be classified similarly. [Both "mixed-use Intensification/Development] It is unclear P18 V&AW should be added to schedule of required engagements	3. Economic	Agreed. It is confirmed that the mapping does show V&A and CBD with same classification. Policy 18 (Create and manage a functional interface between ports/harbours and their surrounding areas) has been amended.
95.47	Gavin Smith	Greater Cape Town Civic Alliance	While there is recognition in the CTSDf that small businesses have suffered from the dramatic growth in shopping malls, the city continues to promote shopping malls in places like Princess Vlei, which is surrounded by shopping malls, and about which there is significant objections on spiritual and biodiversity grounds.	3. Economic	This comment raises a valid point. This issue is, in part, addressed in policy P16
95.48	Gavin Smith	Greater Cape Town Civic Alliance	Development of Cape Town's CBD and the rejuvenation of the Belville CBD is listed, but the appropriately located development of the small, medium and micro-enterprise sector throughout the city also needs strong attention.	3. Economic	Agreed. Will be considered in the development of the Economic Opportunities Zone plan
95.51	Gavin Smith	Greater Cape Town Civic Alliance	P2 - The city is very unclear about the current population figures and is therefore not at all clear about the figures going forward. We are concerned about the partnership the city established with the Property Development Forum- it appears to have led to pressure on the city by developers. We are concerned that EOZs, are not yet identified, areas that can accommodate these, incentives do not appear to have been yet identified as yet.	3. Economic	There was an error in the legend of Figure 3.1 which we noticed after printing. The best available population figures and projections have been used. The positions of all stakeholders has been considered. EOZs are now shown on mapping and will be subject of further work.
95.52	Gavin Smith	Greater Cape Town Civic Alliance	P3 - There are already policies in existence to support this. Why is it only now being "introduced" through the CTSDf.	3. Economic	The SDF focuses on land use aspects of small and informal business support. Other City policies including the Economic Development Strategy and the Informal Business policy also have reference.
96.28	Simon Liell-Cock	Far South Peninsula Community Forum	The SDF does not place enough emphasis on the economic value of Tourism. Employment Plans do not mention tourism. Tourism is low impact, dispersed through the local economy and participants do not need high qualifications.	3. Economic	Agreed Strategy 1: Plan for employment and improved access to economic opportunities has been amended to place greater emphasis on tourism.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
96.29	Simon Liell-Cock	Far South Peninsula Community Forum	The economic, and health benefits of recreation, e.g. bikes, boats, paddle skis, etc. should be included in the plan for employment (Section 4.4.1 Page 25).	3. Economic	Agreed Policies amended to place greater emphasis on tourism
96.3	Simon Liell-Cock	Far South Peninsula Community Forum	Economic priority action areas (Table 8.2 Page 74) should include Tourism.	3. Economic	Agreed. Map 5.8 and Table 8.2 have been amended
96.32	Simon Liell-Cock	Far South Peninsula Community Forum	We need accurate data on how many people are employed in the Tourism industry which is the core of the South Peninsula economy.	3. Economic	There is merit in this comment. This information is difficult to extract from existing statistical sources. The UDZ areas was established and is managed in compliance with national policy
101.6	Liz Brunette	Constantia Hills Residents Association	Policy 5 - Urban Development Zone is not described and requires guidelines for preparing a management plan as provided for an Economic Opportunity Zone (Table 6.1)	3. Economic	EOZs are now included in SDF mapping. Comment will be considered when drafting EOZ management plan
102.1	Alan Jackson	Greater Lynfrae Civic Association	Ensuring the availability of well placed city owned land for informal and formal business.(Policy 3)	3. Economic	Agreed. Included in policy 3
102.11	Alan Jackson	Greater Lynfrae Civic Association	Jobs, and Security, Maintenance, infrastructure upgrade in the Metro South East and Atlantis.(Policy 7)	3. Economic	Agreed
102.14	Alan Jackson	Greater Lynfrae Civic Association	Small businesses have suffered from the dramatic growth in shopping malls, but the city continues to promote shopping malls in places like Princess Vlei, which is surrounded by shopping malls, and about which there are significant objections on spiritual and biodiversity grounds.	3. Economic	The comment has been considered and in part addressed in policy 16
102.15	Alan Jackson	Greater Lynfrae Civic Association	We support the further development of Cape Town's CBD and the rejuvenation of the Bellville CBD	3. Economic	agreed
102.16	Alan Jackson	Greater Lynfrae Civic Association	Recognising the distance between metro south-east and employment, the cities major thrust needs to be the development of lower cost housing closer to the major urban centres.	3. Economic	Agreed. See policy 3: Build an inclusive, integrated, vibrant city
102.17	Alan Jackson	Greater Lynfrae Civic Association	Support the development of the small, medium and micro-enterprise sector throughout the city	3. Economic	Agreed. Included in policy 3

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
102.25	Alan Jackson	Greater Lynfrae Civic Association	We are concerned that EOZs, are not yet identified, areas that can accommodate these, incentives do not appear to have been yet identified as yet.	3. Economic	Noted. These have now been included in the mapping. Comment will be considered when drafting EOZ management plan
102.8	Alan Jackson	Greater Lynfrae Civic Association	Where are the current Economic Opportunity Zones (Policy 2)	3. Economic	These have now been included in the mapping
102.9	Alan Jackson	Greater Lynfrae Civic Association	Where are the Industrial Development Zones (Policy 5)	3. Economic	Noted (An initiative is underway to investigate the feasibility of establishing an IDZ in Saldanha)
103.19	Patrick Dowling	WESSA	Striving for 6% growth will lead to collapse of sustainability – new paradigms for well being and successful living must be found.	3. Economic	Resource consumption should be limited not economic growth. Strong economic growth is an important objective.
103.26	Patrick Dowling	WESSA	P2 – troubled by notion of partnerships with private sector. City currently being compromised by profit seeking few who are allowed to pursue plans because of vague infrastructure arrangements;	3. Economic	Comment has been considered
112.1	Corlia Coetser	Cape Town Regional Chamber of Commerce & Industry	Suggest that Cape Town's economic competitiveness be actively pursued by attracting investment and new technology development to stimulate economic growth to counter problems of urbanisation and unemployment. The reference to 'South East' should be defined as meaning Mitchell's Plain , Khayelitsha and surrounds, not Helderberg.	3. Economic	Agreed. Issues raised relate more to the City's Economic Development Strategy currently being developed. Will be considered when engaging with the drafting team of this strategy. Text has been edited to better define the "South East"
112.2	Corlia Coetser		The Helderberg area can make a contribution to the required growth if recognised in the SDF to enable it to attract suitable businesses and industry to the area.	3. Economic	Agreed. Will be considered in the development of the Economic Opportunities Zone plan
114.4	Willie van der Westhuizen	Western Cape Property Development Forum	Lack of importance placed on the economy in spatial development principles (4.3).	3. Economic	The comment has merit

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
	Dr Barbara van Geems	Eskom Distribution (Western Region)	Supports the possibility of promoting regional economic planning by engaging with various parastatals, organizations on issues of cross border economic development and economic infrastructure. Have attached a plan showing Eskom's existing and future electrical infrastructure.	3. Economic	The City's electricity Risk Areas have been updated to include Eskom's supply areas (see map 7.3) The CTSDf is applicable at a city wide scale. The detail raised by this comment is beyond the scope of the framework. District and Local level planning frameworks are a more appropriate forum to address the authors suggestions and the authors submissions have been passed on to the relevant line dept.
Comment Theme: Urban Growth Management					
1.1	James Piggot		Existing agreed urban edge line should be rigorously enforced and extended around all wetland areas eg floodplain of Hout Bay River.	4. Urban Growth Management	The respondent should refer to the following City documents: Development Edges Policy: Urban and Coastal Edge (Draft 2010); Northern Metro, Helderberg Peninsula and Melkbosstrand Urban Edge reports (2001); Coastal Protection Zone By Law (draft 2010); and Urban Edge Guidelines Manual (2004).
10.1	Margie le Roux	Greater Lynfrae Civic Assoc	Wants copy of Densification Policy; also definition of medium & high density is missing from SDF	4. Urban Growth Management	This information was supplied. Density is a relative concept. What is considered high density in a high income area is different to what is considered high in a low income area. For example the densities in some townships are higher than that of Sea Point.
22.1	Anine Trumpelman		Require high resolution map of Lansdowne Rd/Weltevreden Rd area. Urban edge is not shown in the correct position in the Philippi / Sheffield Rd area.	4. Urban Growth Management	This error has been correct - the approved Sheffield Rd alignment will be used as the alignment for the Urban Edge and the Philippi Horticultural Area
23.1	RJ Dent	Gordon's Bay Residents Assoc	Require detailed map of Gordon's Bay urban edge	4. Urban Growth Management	The information requested was supplied
24.4	Christo Kannenberg	Planning Partners	Demarcation of urban edge should accommodate development over the time frame of the plan. NB wrt affordable housing. Once urban edge has been finalized, NEMA process should be simplified for land within the edge.	4. Urban Growth Management	The PSDf requires that the City delineate a medium term Urban Edge which accommodates medium term (approximately 10 - 15 years). The CTSDf and Development Edges Policy: Urban and Coastal Edge (draft 2010) outlines the guidelines for reviewing the urban edge. A mandatory 5 year review of the Urban Edge is provided for. In terms of NEMA the triggers for an EIA are already more onerous for erven outside the urban edge.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
24.5	Christo Kannenberg	Planning Partners	Concerned about densities of new developments on the urban edge. The SDF or District Plans should have a layer indicating a range of densities	4. Urban Growth Management	It is acceptable that densities in areas close to the urban edge, in the growth path of the city are high e.g the north of Kraaifontein. The District Spatial Development Plans identify the areas of land use intensification and put forward density/ height guidelines in some areas.
24.6	Christo Kannenberg	Planning Partners	The 2010 SDF does not provide reasons for why it "will not support proposals to upgrade KNPS generative capacity, or the construction of new nuclear installations". It is not appropriate for ESKOM to have to apply for the amendment of the SDF should it want to develop its site further. The City's approach to potentially hazardous installations or activities is not consistent.	4. Urban Growth Management	A meeting was held between representatives of Eskom and the City on the 9th/02/2011 to discuss the policy statement alluded to by the author. On the basis of the discussion, it was agreed that the wording of Policy P26.5 could be revised with the intention to more clearly describe the policies underlying intention, thereby clarifying the statement, and establishing a measure of flexibility. Refer revisions to P24.
31.1	Karen Gottschalk		Existing infrastructure eg roads and sewerage is not coping and will not cope with additional development pressure.	4. Urban Growth Management	Agreed. The 15 year growth management plan (see Section 7.3) is proposed as the appropriate tool for cross-sectoral planning and budgeting and managing city growth in a sustainable manner.
32.1	Keith Featherstone	Nuclear Division, ESKOM	Objects to statement P26.5 : ' In the medium to long term, the City would like to remove the development impediments imposed by Koeberg Nuclear Power Station and will therefore not support proposals to upgrade KNPS's generative capacity, or, the construction of new nuclear installations'. This potentially inhibits the construction of new nuclear installations on the Duynefontein site, which is strategic for the meeting of RSA's long term electricity needs. EIA process is currently underway for this site. The statement inhibits increases to the electricity output of Koeberg Nuclear Power when large components are replaced as part of the normal station life cycle management program.	4. Urban Growth Management	A meeting was held between representatives of Eskom and the City on the 9th/02/2011 to discuss the policy statement alluded to by the author. On the basis of the discussion, it was agreed that the wording of Policy P26.5 could be revised with the intention to more clearly describe the policies underlying intention, thereby clarifying the statement, and establishing a measure of flexibility. Refer revisions to P24.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
32.2	Keith Featherstone	Nuclear Division, ESKOM	CTSDf must be aligned with the requirements contained in the DoE Regulations on development in the formal emergency planning zone of the KNPS to ensure effective implementation of the KNEP.	4. Urban Growth Management	A meeting was held between representatives of Eskom and the City on the 9th/02/2011. ESKOM's request to include statements in the CTSDf restricting the population density within KNPS's emergency evacuation zones was discussed at length. There is an urgent need to withdraw outdated apartheid planning apparatus (Atlantis and Environs Guide Plan, 1981) and, at the same time, an opportunity to reflect the new approach to integrated emergency planning and preparedness in the CTSDf. The City officials explained the treatment of ESKOM's comment in the previous CTSDf and the outcome of the CoCT's recent engagement with the NNR. The City highlighted the NNR's position that the development controls in the CTSDf are sufficiently aligned with the draft DOE regulations and will suffice as an interim policy statement until such time as the DOE regulations on development surrounding KNPS are statutorily approved
32.3	Keith Featherstone	Nuclear Division, ESKOM	Reserves the right to comment on the proposed airport and regional landfill sites because either of these may pose an external hazard to the KNPS.	4. Urban Growth Management	Authors comment noted, this was also discussed in meeting on 9th/02/2011.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
32.4	Keith Featherstone	Nuclear Division, ESKOM	As long as the CoCT Disaster Management Plan can demonstrate compliance with the NNR's KNEP requirements for existing and future spatial developments, the population density may be omitted from the CTSDf. But this must be endorsed by the NNR.	4. Urban Growth Management	A meeting was held between representatives of Eskom and the City on the 9th/02/2011. ESKOM's request to include statements in the CTSDf restricting the population density within KNPS's emergency evacuation zones was discussed at length. There is an urgent need to withdraw outdated apartheid planning apparatus (Atlantis and Environs Guide Plan, 1981) and, at the same time, an opportunity to reflect the new approach to integrated emergency planning and preparedness in the CTSDf. The City officials explained the treatment of ESKOM's comment in the previous CTSDf and the outcome of the CoCT's recent engagement with the NNR. The City highlighted the NNR's position that the development controls in the CTSDf are sufficiently aligned with the draft DOE regulations and will suffice as an interim policy statement until such time as the DOE regulations on development surrounding KNPS are statutorily approved - The development controls have therefore been endorsed by the NNR.
35.2	Dr Koos Jonker		Does not make proper provision for lower income housing. Calculations to determine the Urban Edge are faulty as backlog of 400 000 families is not recognized.	4. Urban Growth Management	The calculations referred to are based on development trends and the City's current housing delivery program. A scenario which made provision for a substantial increase in housing delivery was also modeled. It makes no sense to move the Urban Edge to accommodate the housing backlog if financial resources and housing delivery capacity do not allow the City to adequately address it.
37.4	Alan Dolby	Constantia Property Owners' Association	Urban Edge Policy needs to be entrenched in the CTSDf and if possible given greater status.	4. Urban Growth Management	Agreed. The approval of the CTSDf as a structure plan in terms of Section 4(6) of the Land Use Planning Ordinance (No. 15 of 1985) will give it statutory status.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
41.3	Rowan Dent	Gordon's Bay Residents Assoc	Many aspects of the new Urban Edge are unacceptable. Eg new terrain of 6 sqkm. Objects to maximum elevation for building on mountain slopes (was 200m and now 350m above sea level). Urban Edge has been extended for express purposes of accommodating speculative luxury development.	4. Urban Growth Management	When the Urban Edge was reviewed in 2008 it was decided that small properties (less than approx. 5 ha) and properties which already had rights to be subdivided into smaller properties should be located inside the urban edge as the majority of them were not being farmed. The advantage for property owners is that they qualify for municipal services such as garbage collection. When they were included inside the Urban Edge a land use change was not envisaged for much of the area affected. The land use guidelines in Helderberg District Spatial Development Plan (draft 2011) advocate the retention of the character of area above the T2. We agree that some of the development is at an inappropriate contour and are using the urban edge to ensure that this does not happen again.
41.4	Rowan Dent	Gordon's Bay Residents Assoc	Densification is supported as urban infill and not as a blanket policy. Existing infrastructure (eg roads and storm water) is inadequate and will not accept increased development.	4. Urban Growth Management	A "one size fits all" approach to densification is not being proposed. When assessing density applications a broad range of factors (including infrastructure capacity) need to be taken into consideration.
41.5	Rowan Dent	Gordon's Bay Residents Assoc	Opposed to development on erf 2, Gordon's Bay. This erf should be outside the urban edge and the old guide plan 'urban development' designation must be removed.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. LUPO application underway therefore no comment
49.1	Theo Steyn	NuPlan Africa	The recommendations of PEPCO regarding the incorporation of erven 617, 2003, remainder 3132, Joyce's dairy Farm (erven 89, 88 and 91) Melkbosstrand that : 'No urban edge adjustment; general reassessment of the edge in this area once the growth options study has been completed'. This recommendation is not reflected in the CT SDF. Object to these erven still being excluded from the medium and long term urban edge around Melkbosstrand.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. Suggestion not supported. General re-assessment of edge in this area once the growth options study has been completed. No Urban Edge adjustment in 5km Koeberg exclusion zone.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
49.3	Theo Steyn	NuPlan Africa	The argument that land within the 0 - 5km safety zone should not be developed from a nuclear safety point of view is rejected.	4. Urban Growth Management	The City initiated a process of engagement with the National Nuclear Regulator to discuss the development restrictions around KNPS. It was agreed that a revised statement (refer P24), which is accordance with the principles of the development restrictions advocated by the NNR, will suffice as an interim policy statement in the CTSDF until such time as the Department of Energy regulations on development surrounding KNPS are statutorily approved.
50.14	Andy Miles	Property Developers Forum	Absence of full consideration of the social impact of proposed strategies, specifically densification.	4. Urban Growth Management	One of the contextual informants for assessing density applications is socio-economic considerations.
50.4	Andy Miles	Property Developers Forum	The inclusion of the proposed fixed urban edge line is premature and inappropriate. Preferable the edge should have the status of a guideline.	4. Urban Growth Management	The PSDF requires that the City delineate a "medium term Urban Edge as part of the Spatial Development Framework approved in terms of section 4(6) of LUPO. In the absence of the approved "medium term Urban Edge" an "interim Urban Edge" is delineated around existing urban development. The interim urban edge supersedes the urban edge approved by Council in 2001 and is far more conservative than it. The Urban Edge on Map 6.1 that has been delineated in compliance with the PSDF requirement will classify as the "medium term Urban Edge upon approval of the CTSDF by PG:WC as a structure plan.
50.6	Andy Miles	Property Developers Forum	Strategy of densification should be part of a mix of strategies. However, the presence of an urban edge will do nothing to make densification projects (eg along corridors) more or less attractive. Developers will simply rather invest in other locations in South Africa or the world. Strategy of densification needs to look rather at ease of implementation, lower infrastructure costs and a clear method for getting planning approvals. eg a 'nothing to declare' green lane for the processing of double dwelling applications.	4. Urban Growth Management	The City has undertaken some studies on the mechanisms that should support densifications and needs to priorities which mechanism should be the subject of further research and development.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
51.1	Jaco Schreuder		Supports higher density and a more compact city which will make public transport more viable. Suggest creating a zone for skyscrapers outside the historic city area.	4. Urban Growth Management	The City has advertised a tall buildings policy for public comment.
52.2	Sisa Moboza	PRASA Cres (Corporate Real Estate Solutions)	Include Farm 782 Firgrove within Urban Edge. This is indicated as urban development on Map 7.1 but also indicated as located outside the urban edge.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. Suggestion not supported. Parts of property identified are outside the municipal boundary and cannot therefore be included within the Urban Edge. The parcels of land within the Urban Edge do not abut the western edge of urban development in Somerset West.
53	HA Kotze	Werksmans Attorneys	Farm Groote Springfontein No 1, Blaauwberg to be indicated for development. It is shown as Urban Development in terms of the Atlantis and Environs Guide Plan. The CT SDF is directed substantially more towards the natural environment and down plays the social and economic issues eg rapid urbanization and access to economic opportunities for Atlantis.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. Suggestion not supported.
54.1	Mark Schafer	Bergvliet-Meadowridge RPA	Clearly there is a need for residential densification but this should not be at the expense of maintaining the nature and character of an existing particular neighbourhood.	4. Urban Growth Management	Agreed.
54.3	Mark Schafer	Bergvliet-Meadowridge RPA	Objects to reviewability of the urban edge on a 5 year basis. There are certain areas (such as Constantia and Phillipi farming areas) where the urban edge should be fixed in perpetuity.	4. Urban Growth Management	The comment is valid . The pros and cons of the 5 year review were debated extensively.
55.4	Ms HMJ du Preez	Dept Cultural Affairs & Sport	Densification proposals should be re-evaluated for urban conservation and heritage areas.	4. Urban Growth Management	The Cape Town Densification Policy (draft 2010) includes built fabric and heritage as one of the contextual factors that need to be taken into account when determining the height, form and extent of densification.
55.7	Ms HMJ du Preez	Dept Cultural Affairs & Sport	Urban Edge proposals need to be discussed between CoCT and neighbouring municipalities and the provincial authorities to ensure a coordinated approach.	4. Urban Growth Management	There have been numerous cross-border discussion with our neighbouring municipalities.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
58.2	David Bettesworth	David Bettesworth T&R Planners	Map 6.5 - Need clarity as to the designation of Klein Dassenberg Small Holding Area.	4. Urban Growth Management	It is agreed that in the medium to long term it would be inappropriate for the Klein Dassenberg Small Holding Area to extend into the preferred growth direction of Atlantis. The area west of Mamre Rd has therefore been removed from Map 6.1.
59.3	Monica Sutherland	RRR&BA	The basic cause of the need for all this densification is not being handled.	4. Urban Growth Management	The factors inhibiting and promoting densification were discussed in detail in the Cape Town Densification Strategy (2009) advertised for public comment in 2009.
61.2	Frank Wygold	Cape Environmental Trust (CAPTRUST)	Urban edges along geophysical boundaries eg mountain slopes should be considered to be permanent and not subject to review. Need to add in buffer zones that serve to protect the urban edge.	4. Urban Growth Management	One of the guidelines in Table 5.5 states that "as a general principle where the Urban Edge line has been accurately delineated to protect natural resources (core bio-regional spatial planning categories and select development in buffer areas) it should not be amended".
61.6	Frank Wygold	Cape Environmental Trust (CAPTRUST)	Omission - absence of mention of making land available for responsible handling of municipal solid waste.	4. Urban Growth Management	It is the City's view that the land fill sites near Melkbosstrand and Kabaskraal will both be needed in the long term. This is why the Melkbosstrand site is shown on the Map 5.4 and 6.1. The EIA process underway will determine which site is developed first.
65.1	Joy McCarthy	Table View Ratepayers Assoc	Concept of densification does not coincide with that of the PSDF - which one will take precedence ?	4. Urban Growth Management	The CTSDf's concept of densification does and must align with that of the PSDF
65.2	Joy McCarthy	Table View Ratepayers Assoc	If urban edges are to be altered then extensive consultation needs to occur. Loss of agricultural land caused by moving the urban edge will cause job losses. Extending the urban edge will endanger some critical areas and impact negatively on biodiversity. Should be buffer zones between development and sensitive areas.	4. Urban Growth Management	There has been extensive public consultation regarding the urban edge shown on Map 6.1. Once the CTSDf is approved as a structure plan in terms of 4(6) of the Land Use Planning Ordinance (No. 15 of 1985) property developers wishing to amend the Urban Edge will have to apply to PG:WC for a structure plan amendment. Such an amendment will require public participation.
65.3	Joy McCarthy	Table View Ratepayers Assoc	Questions financial ability to develop new areas and provide infrastructure for these and also maintain the existing old infrastructure when many people do not pay rates etc.	4. Urban Growth Management	Agreed. This is why the IDP and 15 year growth management plan (see Section 7.3) is proposed as the appropriate tool for cross-sectoral planning and budgeting and managing city growth in a sustainable manner.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
66.1	Arno Hood	Jetsetter Aviation	Refers to the planned redevelopment and partial commercialization of the Ysterplaat Aerodrome (Cape Town City Airport). This will become a significant catalyst for urban regeneration of the surrounding areas eg Brooklyn, Maitland, Rugby and Kensington. This will support the long term strategic objectives of the CTSDF. CTSDF should recognize the location of this proposed airport as the future general, domestic/ international passenger and freight airport for the city.	4. Urban Growth Management	Whilst the authors lengthily submission is acknowledged, to our knowledge no application has been submitted for any of the proposals described by the author. Any such application will need to be accompanied by detailed specialist investigations (including evaluation of noise impacts on surrounding fabric, possible aviation specialist to investigate airport related technical issues as well as potential airspace management conflict with CTIA) and the application will then be reviewed on its merits. Ysterplaat is recognized as a strategic site and the City will support the site being used for mixed use development subject to nec. application process (see Policy 17.3).
66.2	Arno Hood	Jetsetter Aviation	The proposed location of the commercial 'Potential future airport' is unsuitable. Eg fog belt	4. Urban Growth Management	In April 1997, an Airport Systems Consortium was appointed by the Cape Metropolitan Council (CMC) to prepare an Airport Systems Plan for the Cape Metropolitan Area. Phase 2a of this study developed criteria for the evaluation of alternative "green field" sites and applied these to a number of potential alternative airport sites both within and beyond Cape Town's administrative boundaries. The selection criteria informing the location of potential alternative sites included, inter alia atmospheric conditions (influence of fog and cross winds). Whilst the study occurred some time ago, the site within the metropolitan area found to be most appropriate for such a purpose is located South East of Atlantis. This 'preferred' site is indicated in the CTSDF. A proposal for an alternative airport site would need to adequately address the requirements and criteria addressed by the Airport Systems Plan in motivation, or as a substitute for the preferred Atlantis South East site.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
66.3	Arno Hood	Jetsetter Aviation	The location of the proposed regional commercial freight airport is also unsuitable. Advised that these proposals are ignored in favor of the Cape Town City Airport.	4. Urban Growth Management	In April 1997, an Airport Systems Consortium was appointed by the Cape Metropolitan Council (CMC) to prepare an Airport Systems Plan for the Cape Metropolitan Area. Phase 2a of this study developed criteria for the evaluation of alternative "green field" sites and applied these to a number of potential alternative airport sites both within and beyond Cape Town's administrative boundaries. Whilst the study occurred some time ago, the site within the metropolitan area found to be most appropriate for such a purpose is located South East of Atlantis. This 'preferred' site is indicated in the CTSDf. A proposal for an alternative airport site would need to adequately address the requirements and criteria addressed by the Airport Systems Plan in motivation, or as a substitute for the preferred Atlantis South East site.
66.4	Arno Hood	Jetsetter Aviation	It is not safe or practical to establish 2 major general airports in such close proximity to each other.	4. Urban Growth Management	In April 1997, an Airport Systems Consortium was appointed by the Cape Metropolitan Council (CMC) to prepare an Airport Systems Plan for the Cape Metropolitan Area. Phase 2a of this study developed criteria for the evaluation of alternative "green field" sites and applied these to a number of potential alternative airport sites both within and beyond Cape Town's administrative boundaries. Whilst the study occurred some time ago, the site within the metropolitan area found to be most appropriate for such a purpose is located South East of Atlantis. This 'preferred' site is indicated in the CTSDf. A proposal for an alternative airport site would need to adequately address the requirements and criteria addressed by the Airport Systems Plan in motivation, or as a substitute for the preferred Atlantis South East site.

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68.2	Oliver Dods	Hout Bay & Llandudno Heritage Trust	Existing agreed urban edge line should be rigorously enforced and extended around all wetland areas eg floodplain of Hout Bay River.	4. Urban Growth Management	The Urban Edge has been delineated along or outside the developed footprint of the city. It would be inappropriate to draw an urban edge around rivers and wetlands within the developed footprint of the city.
68.3	Oliver Dods	Hout Bay & Llandudno Heritage Trust	Densification only if there is adequate infrastructure and once the effects have been tested by an independent environmental impact assessment.	4. Urban Growth Management	Agree with the comment about adequate infrastructure but do not agree that an environmental impact assessment is the correct way of testing capacity. It is, however, noted that certain development applications will trigger the need for an EIA to measure, protect and mitigate against adverse environmental impacts. In terms of NEMA an EIA needs to be done by an independent consultant.
70.9			Detailed chapter by chapter comment - refer to submission. Eg The MSA and DFA are selectively reflected - important aspects of these are not mentioned. No indication of extent to which the SDF will direct the City's sectoral strategies listed in Appendix B.	4. Urban Growth Management	Chapter 2 has been edited and in part addresses these concerns. The City has been carefully to ensure that CTSDf drafting process and content of the CTSDf comply with the relevant legislation. The SDF will be approved in terms of Section 4(6) of the Land Use Planning Ordinance (No. 15 of 1985) and as part of the IDP in terms of the Municipal Systems Act (No. 32 of 2000)
73.2	Kim Kruishaar	Independent Environmental consultant living in the Far South Peninsula	Supports principle of densification but the where and how needs careful planning eg infrastructure provision.	4. Urban Growth Management	Agreed - local plans are advocated as the most appropriate scale to deal with issues related to density.
76.01	Ms S.A Sharpe	Barbarossa Residents Group	Densification: Concern re aging infrastructure, impact on views and amenities (important for tourism). Attractive residential areas important for attracting skilled labor Densification: Is City policy compatible with PSDF? Densification: Concern re aging infrastructure, impact on views and amenities (important for tourism). Attractive residential areas important for attracting skilled labor	4. Urban Growth Management	Agreed. These factors need to be taken into account when determining the height, form and extent of densification in a particular area. The CTSDf's concept of densification does and must align with that of the PSDF.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
80.02	Mr John Wilmot	Durbanville Heritage Society	Densification: concerns about negative impacts on older areas and "environmental integrity". Need to respond to identified heritage assets.	4. Urban Growth Management	Agreed. A broad range of factors, which include heritage and built character, need to be taken into account when determining the height, form and extent of densification in a particular area.
80.03	Mr John Wilmot	Durbanville Heritage Society	Infrastructure / urban growth: Concerned that infrastructural is inadequate for residential extensions.	4. Urban Growth Management	Agreed. This is why a 15 year growth management plan (see Section 7.3) is proposed as the appropriate tool for cross-sectoral planning and budgeting and managing city growth in a sustainable manner.
80.04	Mr John Wilmot	Durbanville Heritage Society	Hard/Soft urban edges: Support comments from Gavin Smith Urban Edge should be part of SDF (not separate policy) Hard/Soft urban edges: Support comments from Gavin Smith Urban Edge should be part of SDF (not separate policy) Hard/Soft urban edges: Support comments from Gavin Smith Urban Edge should be part of SDF (not separate policy) Hard/Soft urban edges: Support comments from Gavin Smith Urban Edge should be part of SDF (not separate policy)	4. Urban Growth Management	This issue of hard / soft edges was debated extensively and it was agreed that more in-depth studies were necessary before this could be done. One of the guidelines in Table 5.5 states that "as a general principle where the Urban Edge line has been accurately delineated to protect natural resources (core bio-regional spatial planning categories and select development in buffer areas) it should not be amended".
81.01	Thomas & Sharron Pearce		Densification: Stop densification in Fresnaye and Bantry Bay. Concerns re traffic and loss of urban character (loss of beautiful old houses)	4. Urban Growth Management	It is difficult to generalize in this way. A broad range of factors need to taken into account when determining the height, form and extent of densification in a particular area. Local plans are advocated as the most appropriate scale to deal with issues related to density.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
84.03	George Sieraha	Durbanville Community Forum	<p>Edge: Concerned that Urban edge has been expanded since "CT2001/2006 urban edge studies" and that developers have undue influence over edge decisions. Expressed great concern over recent MAYCO Uitkamp decision.</p> <p>Urban edge should be a hard edge (should not be reviewed) along geophysical boundaries.</p> <p>UE should be included in document without current proposed UE amendments. Current edge should remain pending a full PPP</p>	4. Urban Growth Management	Once the CTSDf is approved as a structure plan in terms of Section 4(6) of the Land Use Planning Ordinance (No. 15 of 1985) it will have greater statutory protection and property developers wishing to amend the Urban Edge will have to apply to PG:WC for a structure plan amendment. Policy P23 and the Development Edges Policy: Urban and Coastal Edge (draft 2010) provide clear guidelines for the review of the development edges.
85.06	Rod Gurzynski	Kommetjie Residents & Ratepayers Association	Densification: 6.2 strategy 2 and map 6.3: South Pen should have lower densification levels and lower building heights than other areas because of the value of the natural environment there. Such constraints should inform the IZS before its implementation.	4. Urban Growth Management	It is difficult to generalize in this way. A broad range of factors need to be taken into account when determining the height, form and extent of densification in a particular area. The District Spatial Development Plans provide development guidelines, including density/ height guidelines for areas.
85.08	Rod Gurzynski	Kommetjie Residents & Ratepayers Association	Edges: Coastal and urban edges in S Pen should be permanent	4. Urban Growth Management	This issue was debated extensively and it was agreed that more in-depth studies were necessary before this could be done. One of the guidelines in Table 5.5 states that "as a general principle where the Urban Edge line has been accurately delineated to protect natural resources (core bio-regional spatial planning categories and select development in buffer areas) it should not be amended".
86.03	Geoff Neden	Far South Peninsula Community Forum	Need more up-to-date population information	4. Urban Growth Management	Agreed. We keenly await the results of the 2011 population census
86.07	Geoff Neden	Far South Peninsula Community Forum	Urban edge should be strictly controlled to prevent urban sprawl. Concerns raised regarding Mayco Uitkamp decision. Urban /costal edge should not be moved.	4. Urban Growth Management	Once the CTSDf is approved as a structure plan in terms of Section 4(6) of the Land Use Planning Ordinance (No. 15 of 1985) it will have greater statutory protection and property developers wishing to amend the Urban Edge will have to apply to PG:WC for a structure plan amendment. Policy P23 and the Development Edges Policy: Urban and Coastal Edge (draft 2010) provide clear guidelines for the review of the development edges.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
86.08	Geoff Neden	Far South Peninsula Community Forum	Densification policy may have unintended consequences. Concerns are raised about uncontrolled densification in unsuitable locations.	4. Urban Growth Management	Comment has validity. The proposed density monitoring and evaluation mechanisms would help monitor unintended consequences. Densification would, in most cases, be the subject of a LUPO application which involves a desirability and impact assessment.
86.13	Geoff Neden	Far South Peninsula Community Forum	Infrastructure Risk Map 3.1: Concern that WW treatment plant [Noorthoek?] is not indicated as high risk	4. Urban Growth Management	The map is based on the basis of a number of indicators. The information was supplied the Water and Sanitation Department.
87.02	Prof A Katz	University of Cape Town	<p>Urban Edge (sir Lowry's Pass Village Rd) should remain in current position (T2) with small holding buffer zone intact and outside the urban edge.</p> <p>Motivation in support of the above:</p> <ul style="list-style-type: none"> • Urban edge should not be moved until requirements of the PSDF are met including requirement before currently rural land can be developed. • Heritage / historical significance of the area • Views and the natural / agricultural character of the area should be protected • Apparent demise of agri activity in the area is misleading. New farms are being established including wine farms. • Moving the edge will affect the functioning of farms above the road. Development speculation/ urbanisation pressures will limit rural investment. • Inappropriateness of developing good agricultural land in the context of increasing global food insecurity. Small-scale agriculture is sustainable and viable. • New developments negatively impact on city infrastructure. 	4. Urban Growth Management	When the Urban Edge was reviewed in 2008 it was decided that small properties (less than approx. 5 ha) and properties which already had rights to be subdivided into smaller properties should be located inside the urban edge as the majority of them were not being farmed. The advantage for property owners is that they qualify for municipal services such as garbage collection. When they were included inside the Urban Edge a land use change was not envisaged for much of the area affected. The Helderberg District Spatial Development Plan (draft 2011) advocate the retention of the character of the area above the T2 road.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
89.01	Prof A Katz/ D. Marais / H Epstein	University of Cape Town	<p>Urban Edge: Retain urban at on the T2 (Sir lowry's Pass Road Area) in order to retain the rural environment of the Schapenberg area. Attention is drawn to the rural, biodiversity conservation, recreational and tourism value of the area.</p> <p>Request that the urban edge and colour of small holding area on map 7.1 be amended.</p> <p>Request that the buffer zone get permanent protection as has been given to the PHA (in P22 on pg 49). The important role the buffer zone (outside of the urban edge) plays in controlling development expectations is emphasized.</p> <p>Copy of 28 Jan 2011 presentation provided.</p>	4. Urban Growth Management	When the Urban Edge was reviewed in 2008 it was decided that small properties (less than approx. 5 ha) and properties which already had rights to be subdivided into smaller properties should be located inside the urban edge as the majority of them were not being farmed. The advantage for property owners is that they qualify for municipal services such as garbage collection. When they were included inside the Urban Edge a land use change was not envisaged for much of the area affected. The Helderberg District Spatial Development Plan (draft 2011) advocate the retention of the character of the area above the T2 road. Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. Suggestion not supported.
90.02	Mark Noble	V&A Waterfront Development Department	Coastal edge: P21: The establishment of a coastal setback line in CBD and V&AW needs to consider existing development rights, heritage, etc. Details of the process for the determination of this line should be provided.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011
93.11	Rory Sales	Noordhoek Conservancy	Improvement on quality of discharge water from Wildevogel Wastewater Treatment Plan is urgently required as the discharge toxicity is an embarrassment to the City.	4. Urban Growth Management	The City is aware of this situation. The IDP and 15 year growth management plan (see Section 7.3) is proposed as the appropriate tool for cross-sectoral planning and budgeting and hence managing city growth in a sustainable manner.
93.14	Rory Sales	Noordhoek Conservancy	Map 6.6. is too coarse grained to see what parcels of land are fit for urban development. Policy 22 should take precedent over this policy	4. Urban Growth Management	The parcels of land identified on this map exclude areas of agricultural and biodiversity value. To view smaller sites the it map needs to be printed at a larger scale or viewed electronically. High resolution electronic maps were made available on the SDF website.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
93.15	Rory Sales	Noordhoek Conservancy	There should be a moratorium on approvals of new development until the servicing backlogs have been addressed (road, sewerage, water, electricity cited). The author provides Ou Kaapse Weg and Wilevogel Treatment Works as examples of where toxic discharge has contaminated wetlands	4. Urban Growth Management	The City is aware of this situation. The 15 year growth management plan (see Section 7.3) is proposed as the appropriate tool for cross-sectoral planning and budgeting and hence managing city growth in a sustainable manner.
93.17	Rory Sales	Noordhoek Conservancy	The CTZS appears to be at odds with CTSDf land use management guidelines. The CTSZ will add existing rights (8-11m and bulk > 200%) to present rights and irrevocably change the heritage, character and lifestyle of residents. Not enough information has been provided to establish an overlay zone. The subsequent removal of enhanced building rights is likely to result in litigation. Clarity is requested regarding timeframes and procedures for preparing overlay zones. Recommend that height and bulk restrictions in Divisional Council zoning scheme be retained until overlay zones are completed.	4. Urban Growth Management	There has been extensive interaction between the team drafting the CTZS and CTSDf and strategies and guidelines have been aligned.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
93.3	Rory Sales	Noordhoek Conservancy	The CT SDF fails to acknowledge the incompatibility of sustainable development with informal development / migration while recognizing and elucidating the problem. The more successful the City is in its attempts to address the housing backlog and service delivery, the more demands will be created on services. Growing populations will lead to a breakdown of natural assets. Noordhoek is a water and energy poor region and the balance of supply and demand has to be carefully planned and managed. Rural development strategies must be pursued. The CT SDF must outline practical solutions to accommodate proposed horizontal and vertical expansion.	4. Urban Growth Management	The City will have to adopt an approach that balances growth, human benefit, the environment and the economy in order to ensure sustainable future urban growth. The future form of urban development needs to be based on achieving a more compact city form, and developing at higher densities in order to promote the more sustainable use of resources, the protection of valuable natural assets, the promotion of an efficient public transport system as well as the provision of infrastructure and services to accommodate new growth in a coordinated and timely manner. To achieve this, the management of urban growth needs to become a deliberate action, rather than the outcome of uncoordinated planning and budgeting, and a more sustainable, compact form of urban growth is required. Urban development should be phased according to spatial planning and infrastructure imperatives, the take-up of land within the urban edge, and the City's capital budget prioritization criteria.
94.13	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Map 7.1 proposes an urban edge along Sir Lowry's Pass Village Road (M9). The edge must remain in its current position (T2) refers policy 27.3 and policy 34	4. Urban Growth Management	When the Urban Edge was reviewed in 2008 it was decided that small properties (less than approx. 5 ha) and properties which already had rights to be subdivided into smaller properties should be located inside the urban edge as the majority of them were not being farmed. The advantage for property owners is that they qualify for municipal services such as garbage collection. When they were included inside the Urban Edge a land use change was not envisaged for much of the area affected. The Helderberg District Spatial Development Plan (draft 2011) advocates the retention of the character of the area above the T2 road.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
94.2	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Historic Village: Heart of the Community tourism project - The proposed urban edge realignment proposed by the Agricultural Land Review Document will permanently and negatively compromise the unique Historic Village in the Sir Lowry's Pass area (the old Victorian Village and Mission Ground, a historic building site– which is considered a key component to enable the sustainable upliftment of the Sir Lowry's Pass community through empowering sustainable SMME's to maximize cultural heritage and other environmental advantages to their commercial benefit)	4. Urban Growth Management	When the Urban Edge was reviewed in 2008 it was decided that small properties (less than approx. 5 ha) and properties which already had rights to be subdivided into smaller properties should be located inside the urban edge as the majority of them were not being farmed. The advantage for property owners is that they qualify for municipal services such as garbage collection. When they were included inside the Urban Edge a land use change was not envisaged for much of the area affected. The Helderberg District Spatial Development Plan (draft 2011) advocate the retention of the character of the area above the T2 road.
94.4	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Re: Agri – Land Review: HIJKLMN – This area bears characteristics of a rural environment. Extending the urban edge as proposed will destroy any semblance of the rural environment and prevent implementation of small scale agricultural activities or food security projects;	4. Urban Growth Management	When the Urban Edge was reviewed in 2008 it was decided that small properties (less than approx. 5 ha) and properties which already had rights to be subdivided into smaller properties should be located inside the urban edge as the majority of them were not being farmed. The advantage for property owners is that they qualify for municipal services such as garbage collection. When they were included inside the Urban Edge a land use change was not envisaged for much of the area affected. The Helderberg District Spatial Development Plan (draft 2011) advocate the retention of the character of the area above the T2 road.
95.1	Gavin Smith	Greater Cape Town Civic Alliance	Even though the CTSDf is communicated as being a strategic document, the main SDF Map (7.1), is seen as enabling. For example areas reflected as 'Urban Development' create the expectation that this is a "blanket" land use. This leaves open opportunities for unscrupulous developers to seize opportunities before the implementation of Local Overlay Zones and the outcomes of any engagement at district level.	4. Urban Growth Management	In terms of Section 5(3) of LUPO, a structure plan shall not confer or take away any right in respect of land. Any change in zoning rights will still require an application in terms of LUPO which will be subject to public participation and will be assessed in terms of its merits.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
95.11	Gavin Smith	Greater Cape Town Civic Alliance	<p>There is a need for buffer zones between conservation/natural areas and development. Alteration of the urban edge to accommodate urban sprawl (suburban low density housing) is counter to the need for sensibly applied densification and encouragement of a compact city (which is the City's position)</p> <p>There is a need for buffer zones between conservation/natural areas and development. Alteration of the urban edge to accommodate urban sprawl (suburban low density housing) is counter to the need for sensibly applied densification and encouragement of a compact city (which is the City's position)</p>	4. Urban Growth Management	Agreed, the CT SDF promotes compact urban development. Policy Statement 23 aims to contain the development footprint of the city within the urban edge.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
95.12	Gavin Smith	Greater Cape Town Civic Alliance	We do not support moving the urban edge in terms of the proposed 5 year review until: The City has commissioned a rigorous independent SIA in this regard, The City has access to accurate population figures for Cape Town, There is reliable research into the effects of moving/not moving the urban edge on economic growth, There is reliable research into the effects of moving the urban edge on the City's densification policy and the Provincial SDF, There is reliable research into the impacts on the existing infrastructure caused by new developments beyond the existing urban edge, including enforceable mitigation measures against any negative impacts, There is reliable research into the costs associated with the maintenance of the infrastructure required for new developments beyond the urban edge, The City is able to explain to us how it makes a decisions about whether the land is suitable for this kind of development/is best suited to other purposes, There has been another extensive Public Participation process with regard to the urban edge in general, There is in place another well thought through, inclusive and logical policy with regard to moving the urban edge	4. Urban Growth Management	We concur with many of the statements in the comment. The concept of the 5-year review was debated extensively and it was supported as it offered an opportunity for proactive, City led growth management rather than reactive, piecemeal decision making. It should be noted that the City is obliged to consider all development applications on their merits.
95.19	Gavin Smith	Greater Cape Town Civic Alliance	SIA - Any densification policy needs guidelines aimed at managing consequences.	4. Urban Growth Management	Policy Guidelines P22.1, 2,3 and 4 detail the management of appropriate densification.
95.28	Gavin Smith	Greater Cape Town Civic Alliance	SIA - There are various cumulative impacts associated with compaction and densification such as Traffic, Sewerage, Solid waste, Trampling, Vagrancy etc	4. Urban Growth Management	Comment has validity. The proposed density monitoring and evaluation mechanisms would help monitor unintended consequences.
95.35	Gavin Smith	Greater Cape Town Civic Alliance	A densification policy paves the way for more as-of rights including cell masts.	4. Urban Growth Management	The densification policy does not confer rights.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
95.36	Gavin Smith	Greater Cape Town Civic Alliance	The idea of "incremental" densification should be challenged to ensure that open space is not simply area to be replaced eventually with something "more useful."	4. Urban Growth Management	The availability of public open space is an important consideration when determining the height, form and extent of a development application. The Guidelines and Standards for the Planning of City of Cape Town Social Facilities and Recreational Spaces puts forward guidelines for the provision of public open spaces in higher density areas.
95.37	Gavin Smith	Greater Cape Town Civic Alliance	The protection of the City's estuaries must not be compromised by densification.	4. Urban Growth Management	Agreed. Assessment of densification applications will include consideration of impact on the natural environment.
95.42	Gavin Smith	Greater Cape Town Civic Alliance	The proposed development path should not be used as an excuse for dealing with spatial development in a piecemeal way	4. Urban Growth Management	Agreed.
95.43	Gavin Smith	Greater Cape Town Civic Alliance	The city does not do enough work anticipating different scenarios with regard to economic, environmental and social forces	4. Urban Growth Management	The city has done a fair amount of scenario planning primarily through the CTSDf and Cape Town Development Strategy drafting process.
95.44	Gavin Smith	Greater Cape Town Civic Alliance	The city uses different population projections in different documents. Whilst population projections are expected to be greatly influenced by the SDF over time, concerned about the lack of accurate baseline statistics on the present population. The City's estimate of only 3.7 million is questionable. An international source places the Cape Town metro population at 7.3 million.	4. Urban Growth Management	The best available population estimates and projections were sourced in consultation with the City's Strategic Development Information department. Projections used were developed by Prof R Dorrington of the Centre for Actuarial Research, UCT. The source of the 7.3 million figure is not mentioned in the comment received.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
95.45	Gavin Smith	Greater Cape Town Civic Alliance	The CTSDf states that apartheid patterns of development, and low to medium densities continue in the current inequitable and inefficient city form. Also that lower income and subsidized housing does not display the qualities of an integrated human settlement while on the same page we hear that the provision of infrastructure services to Greenfield developments has taken place at the expense of the much required maintenance and upgrade of infrastructure services in existing urban areas and that the current pattern of urban development will consume much of the accessible and serviceable land within the municipal area in 50 to 60 years. There is a definite causal link here and nowhere is it expressed how to resolve these competing results.	4. Urban Growth Management	These issues are addressed in policies 2 and 3.
95.49	Gavin Smith	Greater Cape Town Civic Alliance	Figure 3.10. is of major concern to us as it is crucial to understand what scenarios the city considers is most likely, and it indicates once again that errors will occur when planning is insufficiently rigorous and policies are pushed through without sufficient thought given to the implications of these policies.	4. Urban Growth Management	Noted. However, it is also important to acknowledge uncertainty and for planning to consider a range of future scenarios.
95.5	Gavin Smith	Greater Cape Town Civic Alliance	Good economic policies are of little use in attracting investors if the environment is badly deteriorated, or if the basic infrastructure is poor. This is particularly important in Cape Town where the focus on the tourist industry can only work if environmental quality is maintained.	4. Urban Growth Management	Agreed. Policies 1.1 and 1.2 refer specifically to the protection and enhancement of the city's natural assets that attract investors.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
95.5	Gavin Smith	Greater Cape Town Civic Alliance	We note with concern that recent City recommendations to extend the urban edge, and the city's lack of clarity about how it will bring this about. In support of containing the City's development footprint to protect development edges, and to promote densification, we highlight the enormous need to improve infrastructure in a more compact city in order to achieve this.	4. Urban Growth Management	When the Urban Edge was reviewed in 2008 it was decided that small properties (less than approx. 5 ha) and properties which already had rights to be subdivided into smaller properties should be located inside the urban edge as the majority of them were not being farmed. The advantage for property owners is that they qualify for municipal services such as garbage collection. When they were included inside the Urban Edge a land use change was not envisaged for most of these affected areas. The land use guidelines in District Spatial Development Plans (draft 2011) advocate the retention of the character of much of these areas. The 15 year growth management plan and the IDP are the appropriate vehicles for managing investment in infrastructure and establishing whether a moratorium on development in a particular area is necessary.
95.6	Gavin Smith	Greater Cape Town Civic Alliance	There is an acute need to upgrade the existing infrastructure before the CTSDf is promulgated. The existing infrastructure cannot sustain the massive expansions proposed in the CTSDf.	4. Urban Growth Management	It is inappropriate to link the upgrading of infrastructure and the approval of the CTSDf. The 15 year growth management plan and the IDP are the appropriate vehicles for managing investment in infrastructure.
95.62	Gavin Smith	Greater Cape Town Civic Alliance	P19 - Current experiences (e.g. Princess Vlei) suggest that policy alone is insufficient. Policy compliance dependent on outcomes of District SDP process	4. Urban Growth Management	Beyond the scope of the CTSDf to address.
95.64	Gavin Smith	Greater Cape Town Civic Alliance	P24 - Conditional support dependent on SDP's & overlays. Policy is supported but reality has proven to be contradictory (Uitkamp)	4. Urban Growth Management	Comment does not require a response
95.65	Gavin Smith	Greater Cape Town Civic Alliance	P25 - Much more transparency needed from the City regarding infrastructure limitations and requirements	4. Urban Growth Management	The city is prepared to share its information and is constantly upgrading the quality of its information systems.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
95.66	Gavin Smith	Greater Cape Town Civic Alliance	P27 - There should be a soft buffer zone on both sides of the urban edge demarcation containing land uses sympathetic to the rural and agricultural character of areas beyond the edge.	4. Urban Growth Management	The Development Edges Policy: Urban and Coastal Edge (draft 2010) and Northern Metro, Helderberg Peninsula and Melkbosstrand Urban Edge reports (2001) include guidelines for management zones on either side of the Urban Edge. Upon approval of the CTSDf (including the Urban Edge) as a structure plan in terms of section 4(6) of the Land Use Planning Ordinance (No. 15 of 1985) the City will update the guidelines for the management zones.
95.69	Gavin Smith	Greater Cape Town Civic Alliance	P45 - There should be a 'hard' urban edge along geophysical boundaries (coast, mountain slopes, wetlands, rivers) which should not be reviewed. There needs to be a differentiation between hard and softer urban edges. Policy supported, but reality appears to be stronger than any written word. (Rocklands development in University Estate)	4. Urban Growth Management	This issue was debated extensively and it was agreed that more in-depth studies were necessary before this could be done. One of the guidelines in Table 5.5 states that "as a general principle where the Urban Edge line has been accurately delineated to protect natural resources (core bio-regional spatial planning categories and select development in buffer areas) it should not be amended".
95.7	Gavin Smith	Greater Cape Town Civic Alliance	Proposal for moratorium on all non-essential urban development based on a lack of infrastructure. The environmental impacts on land, riverine and marine environs is extreme with the consequential impacts on human health and the health of our wildlife. Proposed that moratorium pre-empt the promulgation of the SDF or at least be conditional thereto and must also form part of the Zoning Scheme. Allow for a 'planning pause' to study and review existing policies and processes are necessary for adopting or revising a land use plan and related regulations. A perceived outcome is the sustainable upgrading of the competence and infrastructure to support the planned massive expansions of the metro and the intensification/densification of the existing built environs.	4. Urban Growth Management	The 15 year growth management plan and the IDP are the appropriate vehicles for managing investment in infrastructure and establishing whether a moratorium on development in a particular area is necessary.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
95.8	Gavin Smith	Greater Cape Town Civic Alliance	Urban edges have been increased, which dramatically expanded the edge into areas that were originally excluded in the CT 2001/2006 urban edge studies. These new and expanded urban edges as reflected in the previous Draft were designated as being for "URBAN INFILL", i.e. read densification/intensification and required housing. In this Draft these areas are now reflected as 'URBAN DEVELOPMENT'.	4. Urban Growth Management	When the Urban Edge was reviewed in 2008 it was decided that small properties (less than approx. 5 ha) and properties which already had rights to be subdivided into smaller properties should be located inside the urban edge as the majority of them were not being farmed. The advantage for property owners is that they qualify for municipal services such as garbage collection. When they were included inside the Urban Edge a land use change was not envisaged for much of the area affected. The District Spatial Development Plans (draft 2011) advocate the retention of the character of many of the areas that were included inside the urban edge.
95.9	Gavin Smith	Greater Cape Town Civic Alliance	The fact that some are now proposing that each application be "judged on it's individual merits" and should not be scuppered by the 'fatal flaw' of being outside an urban edge is seen as the next phase of making 'urban planning'	4. Urban Growth Management	Once the CT SDF is approved as a structure plan in terms of Section 4(6) of the Land Use Planning Ordinance (No. 15 of 1985) it will have greater statutory protection and property developers wishing to amend the Urban Edge will have to apply to PG:WC for a structure plan amendment. Policy P23 and the Development Edges Policy: Urban and Coastal Edge (draft 2010) provide clear guidelines for the review of the development edges.
96.1	Simon Liell-Cock	Far South Peninsula Community Forum	The Draft SDF Technical Report correctly highlights the problems but does not, in our opinion, adequately address them. The Report favors development with the emphasis on densification but fails to provide solutions in respect of the enormous scarcity of environmental resources. New development, densification, industrial activity and the unknown variable growth are considered inevitable and in some cases even desirable, yet there are no real policies in place to ensure the systematic minimization of wasteful use of the environmental resources and no emphasis on minimizing their consumption.	4. Urban Growth Management	Approximate 48% of the municipal area has been set aside for the protection of various kinds of natural resources. In order to be able to accommodate urbanisation a more compact form of development is essential. It has been estimated that if we continue with the current model/ approach to development we will reach the outer limits of the municipal boundary within 50 years.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
96.14	Simon Liell-Cock	Far South Peninsula Community Forum	In order to reduce urban sprawl, very strict control of the urban edge is needed. The concept of moving the Urban Edge and / or the Coastal Edge line in response to the need (according to the Report) for more urban development in the long term (15 to 50 years) is short sighted. In future the coast and the geophysical environment will still need protection and more food will be needed for more people. The Urban Edge must ensure better protection for valuable agricultural land. The recent MAYCO decision to oppose the Planning Department and support development on the farm Uitkamp must be reversed and similar anomalies should simply not be allowed to happen again.	4. Urban Growth Management	We concur with many of the statements in the comment. The 5-year review was debated extensively and it was supported as it offered an opportunity for proactive, City led growth management rather than reactive, piecemeal decision making. Once the CTSDf is approved as a structure plan in terms of 4(6) of the Land Use Planning Ordinance (No. 15 of 1985) it will have greater statutory protection and property developers wishing to amend the Urban Edge will have to apply to PG:WC for a structure plan amendment. Policy P23 and the Development Edges Policy: Urban and Coastal Edge provide clear guidelines for the review of the development edges.
96.2	Simon Liell-Cock	Far South Peninsula Community Forum	Incremental densification, defined as "Small-scale densification that is almost invisible e.g. subdivisions and second dwellings" is problematic. Uncontrolled densification is surely just as dangerous as urban sprawl. This policy could well turn out to be an example of the Law of Unintended Consequences by giving rise to the possibility of effectively uncontrolled sub divisions and densifications in entirely unsuitable locations. Areas where it applies should thus be strictly defined and controlled.	4. Urban Growth Management	Comment has validity. Applications for densification will need to be assessed in terms of local context and district planning frameworks. The proposed density monitoring and evaluation mechanisms would help monitor unintended consequences.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
96.21	Simon Liell-Cock	Far South Peninsula Community Forum	We accept the need to "encourage land use intensification and an appropriate mix of land uses to develop along activity routes and development routes" (Section 6.1.3). However, the need to develop four lane highways to accommodate the traffic generated by development intensification in order to promote public transport so as to reduce traffic seems to defy logic. Surely pedestrian routes, cycle routes and safe reliable bus and train services would reduce traffic substantially along activity corridors. We strongly support Policies 12 and 13 which are essential for tourism and opening access to recreation for the population of the whole City.	4. Urban Growth Management	The CTSDf sees the intensification of land uses being supported by other strategies such as creating a better balance between where people live and work so the need to move by motorized forms of transport is minimized.
96.24	Simon Liell-Cock	Far South Peninsula Community Forum	It is of concern that the Kommetjie waste water treatment plant is not indicated on Map 3.1 as high risk.	4. Urban Growth Management	The City is aware of this situation. The IDP and 15 year growth management plan (see Section 7.3) is proposed as the appropriate tool for cross-sectoral planning and budgeting and hence managing city growth in a sustainable manner.
98.1	Rod MacPhail	Vergenoegd Estate	Support for proposed amendment to urban edge on eastern portion of Vergenoegd along 50 year flood line east of Eerste River. Request further review / amendment of the urban edge to include areas above the 50 year floodline (western side of portion 12) – southern most portion of Vergenoegd 653 and 547. The author provides a motivation and asserts that the amendment is consistent with a number of the CTSDf policies.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. The request to amend the Urban Edge west of the historic homestead is still not supported. The City will consider industrial development south of the N2 subject to the findings of the necessary environmental studies. There will therefore be no amendment to the Urban Edge line at this stage.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
98.11	Rod MacPhail	Vergenoegd Estate	Urban edge is a handbrake on development and should be scrapped. Urban edge serves no practical purpose except to raise the cost of land in the city. Author presents report of urban edge on land price escalation "5th Annual Demographia International Housing Affordability Survey: 2009 which author asserts shows relationship where there is more land rationing through the presence of constraints on supply such as urban edge and the cost of land rises in relation to affordability. Asserts the urban edge is inappropriate in context of Cape Town as land prices will rise and 'gini coefficient' will worsen. Urban edge therefore at conflict with stated policy direction of City which hinders implementation. Author asserts that this is a political delusion. Author asserts that other legislation is more appropriate i.e. NEMA.	4. Urban Growth Management	The PSDF requires that the City delineate a "medium term Urban Edge as part of the Spatial Development Framework approved in terms of section 4(6) of LUPO. In the absence of the approved "medium term Urban Edge" an "interim Urban Edge" is delineated around existing urban development. The interim urban edge supersedes the urban edge approved by Council in 2001 and is far more conservative than it. The Urban Edge on Map 6.1 that has been delineated in compliance with the PSDF requirement will classify as the "medium term Urban Edge upon approval of the CT SDF by PG:WC as a structure plan.
98.12	Rod MacPhail	Vergenoegd Estate	Recommend that automatic right for double dwelling be reinstated in the IZS	4. Urban Growth Management	Beyond the scope of the CT SDF. Council has endorsed the CTZS and recommended its approval by the competent authority.
98.2	Rod MacPhail	Vergenoegd Estate	Social engineering proposed by a restrictive urban edge severely drives up the cost of land and is inappropriate for Cape Town. Rising land costs give people no option but to rent their home. The poor in the middle class are unable to buy that valuable capital asset of their own home in order that when they retire they can either live without the cost of paying rent or they have an asset which they can use to assist them in retirement.	4. Urban Growth Management	The guideline related to the provision of inclusionary housing has been reworded to address this concern. See Table 5.5.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
98.3	Rod MacPhail	Vergenoegd Estate	NEMA is capable of protecting natural assets without the strangulation of a development edge. Edges increase the cost of land and make it harder for the poor to own their own home. The principles to guide the review of the urban edge should read "Minimum of every five years or more frequently if necessary if it is not scrapped – which it should be. It is presently too flexible as after 5 years it might not be deemed necessary.	4. Urban Growth Management	When city officials met with representatives of the Property Developers Forum to discuss the method and results of the "Evaluation of land inside the Urban Edge Study" it was agreed that there is merit in undertaking further research related to property economics and that the City would consult them on the content of the brief.
98.4	Rod MacPhail	Vergenoegd Estate	Consider scenario of landowner who has development rights but wishes to speculate. This means that no development can take place in the area since there is land available but landowner doesn't want to develop – thus, the principle of not compromising the urban edge line while development opportunities of similar property markets existing within immediate surrounding areas is nonsense.	4. Urban Growth Management	This comment is speculation rather than fact.
98.5	Rod MacPhail	Vergenoegd Estate	Dispute claim that sufficient land is available within urban edge for the next 11 years. But, the CT SDF also states that "...Given the scale and nature of demand for government subsidized housing and the potential shortage of land..." – Do we have the land or don't we?	4. Urban Growth Management	This comment is speculation rather than fact. The City gave the Property Developers Forum the opportunity of being shown the detailed assumptions the model used and they did not take the offer up.
98.6	Rod MacPhail	Vergenoegd Estate	Planners are proposing social engineering for which they have neither the skill or the wisdom. Projects should be approved or denied on the basis of their merits using NEMA as a guideline where a proper weighting is given to the social benefits and economic improvements as well as environmental protection.	4. Urban Growth Management	The guideline related to the provision of inclusionary housing has been reworded to address this concern. Assessment of applications in terms of NEMA is already required by law.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
98.7	Rod MacPhail	Vergenoegd Estate	It is hard to see how the unique character of the area can be retained when an amendment of the urban edge is proposed for subsidized housing. How do you retain unique character and build mass housing?	4. Urban Growth Management	The guideline referred to is one of many that will be used to assess applications that require a review of the urban edge. It does not supersede the provisions in the National Heritage Resources Act (2009).
98.9	Rod MacPhail	Vergenoegd Estate	Although densification is supported in principle – planners must consider the market, and services which need to be upgraded to cater for densification, and, the need for a rapid and easy process through which densification can take place. The mechanics of this policy require further consideration.	4. Urban Growth Management	Agreed
99.1	Daniel Walden		Natural beauty in Table View / Blaauwberg has been destroyed over the years by sprawling large scale residential development. Please come up with a way to develop our city in such a way as to be responsible stewards of our natural environment.	4. Urban Growth Management	Noted. The District Spatial Development Plan and a planning exercise related to the Table view beach front are the first steps in this direction.
100.1	Graham Noble	Scarborough Ratepayers & Ratepayers Association	The drivers of urban growth section confuses causes and effects, drivers and impacts	4. Urban Growth Management	Chapter 3 has been amended.
100.11	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Figure 3.10 illustrates interactions between drivers, not spatial growth scenario's	4. Urban Growth Management	The text has been corrected.
100.12	Graham Noble	Scarborough Ratepayers & Ratepayers Association	A 'Scenario's' section should be added as 3.2.	4. Urban Growth Management	Amended
100.13	Graham Noble	Scarborough Ratepayers & Ratepayers Association	A 'Consequences' section should be inserted between 3.2 and 3.3	4. Urban Growth Management	The conclusion to chapter 3 has been improved.
100.21	Graham Noble	Scarborough Ratepayers & Ratepayers Association	The Urban Growth Informants section topics are crammed into wishy – washy paragraphs and require more detail. The Urban Edge Policy should play an important part in shaping the future City – driving densification in key areas and preventing urban sprawl. We oppose it being watered down in this way.	4. Urban Growth Management	The urban growth informants section provides a summary of the important growth drivers and trends . This information is derived from detailed studies and information held by City departments.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
100.22	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Urban edge needs intensive debate and its own section in the CT SDF, as well as its own strategy.	4. Urban Growth Management	The City first introduced a Urban Edge in 2001. The PSDF(2009) is the plan with the highest legal status in the Western Cape and it requires that the City delineate a “medium term Urban Edge as part of the Spatial Development Framework approved in terms of section 4(6) of LUPO. In the absence of the approved “medium term Urban Edge” an “interim Urban Edge” is delineated around existing urban development. The interim urban edge supersedes the urban edge approved by Council in 2001 and is far more conservative than it. The process involved in the preparation of the CT SDF has included three rounds of public participation and intensive debate on these issues.
100.28	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Infrastructure mentioned in several places on its own but needs a section on its own as well as its own strategy	4. Urban Growth Management	The CT SDF has been structured around cross-cutting strategic interventions so it is not possible to introduce a separate chapter on infrastructure.
100.6	Graham Noble	Scarborough Ratepayers & Ratepayers Association	The Drivers of Urban Growth section should be titled Strategic Environmental Assessment	4. Urban Growth Management	The title has been adjusted to reflect Strategic Impact Assessment.
100.7	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Needs to be a more serious attempt to identify and assess impacts, consequences of proposed policies and strategies, compare options and alternatives and assess long term and cumulative impacts. The law requires a SEA to assess consequences before approving them – Appendix D is an initial checklist.	4. Urban Growth Management	A strategic impact assessment was completed in 2007 and informed the development and revision of later versions of the SDF. The strategic impacts in Appendix D are high level, city-wide issues. NEMA does not require Strategic Environment Assessment. It does require that NEMA principles are taken into account in the preparation of any plan, but these are for guidance rather than a product such as a SEA.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
100.8	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Comment SDF EMF's but does not replace SEA – CTSDf previous draft titled CH 3 as a SIA which was slammed as being nowhere near an SEA	4. Urban Growth Management	Chapter 2 of the Local Government: Municipal Planning and Performance Management Regulations of 2001, section 4(f) states that an SDF must contain a strategic assessment of the environmental impact of the SDF. This is an assessment of impacts at a strategic scale and was initiated in 2007. The results of that assessment guided the further development of the SDF. The draft CTSDf now includes a number of relevant policies and guidelines to direct development towards appropriate places and forms, to avoid environmental sensitive areas and resources and to maximize sustainable development. Mapping of Environmental Impact Management Zones has been completed and these are addressed in more detail in the District SDPs and Environmental Management Frameworks. A summary of strategic impacts and possible indicators of the CTSDf is included in the Annexure
100.9	Graham Noble	Scarborough Ratepayers & Ratepayers Association	A section entitled Challenges should be introduced;	4. Urban Growth Management	Chapter 3 has been amended. This section does consider challenges faced by the city.
102.24	Alan Jackson	Greater Lynfrae Civic Association	We are concerned about the partnership the city recently established with the Property Development Forum- it appears to have led to pressure on the city by developers which has meant that the city has begun to make mistakes, such as Mayco's suggestion to move the urban edge at Uitkamp.	4. Urban Growth Management	No CTSDf related comment appropriate
102.3	Alan Jackson	Greater Lynfrae Civic Association	The city should introduce the concept of a 'hard' urban edge along geophysical boundaries (coast, mountain slopes, wetlands, rivers) which should be permanent and inviolate.	4. Urban Growth Management	This issue was debated extensively and it was agreed that more in-depth studies were necessary before this could be done. One of the guidelines in Table 5.5 states that "as a general principle where the Urban Edge line has been accurately delineated to protect natural resources (core bio-regional spatial planning categories and select development in buffer areas) it should not be amended".

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
102.37	Alan Jackson	Greater Lynfrae Civic Association	P24 - We support the bulk of new development taking place in the development areas identified. However, we are concerned that the pressures of developers and the City's finances currently means that Mayco is making some serious mistakes which run contrary to its own CTSDf in its recommendations with regard to extending the urban edge.	4. Urban Growth Management	Beyond the scope of the CTSDf to comment
102.38	Alan Jackson	Greater Lynfrae Civic Association	P25 – We support this policy, pending the general acceptance by Civil Society of District SDFs and Local SDFs. But the decision of the Mayco to recommend the extension to the urban edge in the short-term is contrary to the guidelines. In addition, we need much more transparency from the city with regard to the infrastructure required for developments, including roads infrastructure, and infrastructure maintenance requirements.	4. Urban Growth Management	Beyond the scope of the CTSDf to comment
102.39	Alan Jackson	Greater Lynfrae Civic Association	While we support the City's Urban Edge Policy we note with major concern the moves by Mayco to extend the urban edge at Uitkamp for up-market housing, contrary to this CTSDf, and the professional opinion of the City's Environmental and Spatial Planning branches. On this occasion MAYCO has made this recommendation for a piecemeal extension of the urban edge before making recommendations regarding the more general extension of the urban edge on the basis of sound research, logical and carefully considered recommendations put to the Cape Town Community, and careful consideration of the comments of civil society.	4. Urban Growth Management	No CTSDf related comment appropriate
102.4	Alan Jackson	Greater Lynfrae Civic Association	Urban edges are not put in place to be changed willy nilly- they are there in order to contain urban sprawl, and to encourage the development of a more compact City (which is the city's own position).	4. Urban Growth Management	Agreed

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
102.41	Alan Jackson	Greater Lynfrae Civic Association	<p>The last, and in our opinion, very well considered urban edge decisions were made 10 years ago after extensive consultation with a very broad group of stakeholders. We expect the same to happen with regard to any major review of the urban edge policy, including any 5 yearly review the city may or may not have undertaken, before there are any extensions to the urban edge, and this has not been done. In addition the professional opinion of the City's Environmental and Spatial Planning branches should be carefully considered. We are not opposed to the moving of the urban edge. What we need is an overall urban edge policy for the whole city, which is well researched, clear, consistent and predictable. We believe that we require the following before any further applications to move the urban edge take place: An city wide SIA in this regard, Accurate population figures for Cape Town, Research into the effects of moving/not moving the urban edge on economic growth, Reliable research into the effects of moving the urban edge on the densification policy, Explanations by the city as to how it makes decisions about whether the land is suitable for development/is best suited to other purposes, An extensive Public Participation process with regard to the recommendations for the city wide urban edge in general, Clarity with regard to the development corridors</p>	4. Urban Growth Management	<p>There was extensive public participation on the urban edge line (i.e. the 2001 line amended in 2008 and 2010) in 2009 and 2010. In addition the Development Edges Policy (draft 2009) which was advertised for comment in 2009. The investigation into the developable land inside the urban edge was based on the best available information on demographic and development trends. We keenly await the results of the 2011 census. The CT SDF has been through three rounds of public participation.</p>
102.42	Alan Jackson	Greater Lynfrae Civic Association	<p>It remains unclear as to just how dense the City plans that various parts of Districts will become - the District SDFs have not been available as a part of the CT SDF debate, and we have been told by the Planning Department that the District SDFs do not clarify this issue.</p>	4. Urban Growth Management	<p>The District Plans identify the areas suited to land use intensification and put forward density related development guidelines in some areas.</p>

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
102.43	Alan Jackson	Greater Lynfrae Civic Association	It is unclear whether we can develop the infrastructure required to allow for significant densification	4. Urban Growth Management	In many of the older parts Cape Town there is an urgent need to maintain existing infrastructure. It would be possible to upgrade the capacity in these areas at the same time.
102.44	Alan Jackson	Greater Lynfrae Civic Association	We believe that specific areas where infrastructure is available/can be more easily supplied, must be identified for densification, rather than to have this happen in all communities/parts of communities.	4. Urban Growth Management	Agreed
102.5	Alan Jackson	Greater Lynfrae Civic Association	The proposed development path must of necessity be flexible and adaptive, but this should not be used as an excuse for dealing with spatial development in a piecemeal way.	4. Urban Growth Management	Agreed
102.53	Alan Jackson	Greater Lynfrae Civic Association	We support the more compact and efficient form of urban development. However we note with concern the recent City recommendations to extend the urban edge, and the city's lack of clarity about how the city intends creating a compact and efficient form of urban development.	4. Urban Growth Management	Agreed
102.54	Alan Jackson	Greater Lynfrae Civic Association	We support containing the City's development footprint to protect development edges, and to promote densification, but note the enormous need to improve infrastructure in a more compact city in order to achieve this.	4. Urban Growth Management	Agreed. In many of the older parts Cape Town there is an urgent need to maintain existing infrastructure. It would be possible to upgrade the capacity in these areas at the same time.
102.6	Alan Jackson	Greater Lynfrae Civic Association	The city does not do enough work anticipating different scenarios with regard to economic, environmental, and social forces, and sharing these with Civil Society	4. Urban Growth Management	The is validity in the statement and we will take it into account
103.2	Patrick Dowling	WESSA	CTSDF accepts forced population growth as a given instead of exploring growth management strategies – the current loss of 650ha per annum is not sustainable.	4. Urban Growth Management	Agreed

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
103.27	Patrick Dowling	WESEA	P22 – agree with principle of policing non-conforming land uses. Suggest include agri areas along Noordhoek and Kommetjie main road. Provision should be made for food production throughout City. Issue is not soil quality but space as with good practice organic production;	4. Urban Growth Management	This policy has been edited and generally incorporates this comment (see Policy P28)
103.28	Patrick Dowling	WESEA	P25 – Support but more compact development forms but necessitates sufficient attention to ensure adequate capacity of services and infrastructure;	4. Urban Growth Management	Agreed.
103.3	Patrick Dowling	WESEA	Implications for densification i.t.o. increased building activity and demand for materials not explored. CTSDf must give thought on how to avoid knock on impacts i.e. illegal exploitation pressure for building sand;	4. Urban Growth Management	Agreed.
103.8	Patrick Dowling	WESEA	CTSDf must convince Cape Town that infrastructural provision is sufficient w.r.t. domestic waste water and sewerage disposal systems, Programs showing that land uses can be managed to ensure the sustainability of health of resources (i.e. water) should precede CTSDf approval,	4. Urban Growth Management	It is inappropriate to link the upgrading of infrastructure and the approval of the CTSDf. The 15 year growth management plan and the IDP are the appropriate vehicles for managing investment in infrastructure.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
104.1	Cor Agenbag	Headland Planners	Application to include south-south western section of the Philippi Horticultural Area covering 38 properties (erven 539, 541-545, 554-558, 560, 572-575, 578, 607, 609-617, 622, 626, 628, 630, 632, 634, 661-662, 664, 1932-1933) with a total area of +- 300ha within the urban edge and that the demarcation of land should be for urban development. The applicant summarizes the findings of various specialist studies in support of the application and concludes that if vegetable farming remains a priority then there are a number of policies which should be adopted in the CTSDf (1) identification and classification of high potential agricultural land as well as land that may be released for urban development (2) to earmark land to create an appropriate buffer zone around high potential agricultural land (3) to plan urban development in a way that will safeguard agricultural production process and infrastructure against theft.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. Suggestion not supported. The only amendments to the line around the Philippi Horticultural Area that are supported were identified in the report to Council on 26th November 2009. The PHA is the subject of further in depth investigations and no further amendments to the line will be considered until these investigations are complete.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
106.3	Yachita Reddy	Sustainable Energy Africa	Spatial implications in section 3.1.2 are not sufficient regarding peak oil and climate change. To prepare for the consequences of such a real threat – the following proposals are made (1) good urban design (2) establish efficiency support programs and regulations that shape energy choices made by residential and business sectors through encouraging energy efficient and renewable transportation choices and establishing energy efficiency programs and incentives for all new and existing structures (3) support economic development to be promoted (energy efficient solutions and provide employment in a new economic context of preserving farmland and expanding local food production and processing, and identifying and promoting sustainable business opportunities) (4) put in place social and economic support systems to support the poor and marginalized population affected by fuel price increases	4. Urban Growth Management	Section 3.1.2 has been amended. These issues are address in the policy sections of the SDF as well as other city policies.
106.4	Yachita Reddy	Sustainable Energy Africa	P16: Promote mixed use development along major activity routes – Absence of mechanisms to ensure implementation. Use of encourage and discourage do not hold traction w.r.t. ensuring implementation will occur.	4. Urban Growth Management	Agreed. The City has undertaken some studies on the mechanisms that should support densifications and needs to priorities which mechanism should be the subject of further research and development.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
109.1	Alwyn Laubscher	Western Cape Property Development Forum	Comments relate specifically to table 6.5 : Principles to guide the review of the development edges. Questions include Bullet 2 : urban edge can not be the only instrument to ensure that undeveloped land and infrastructure within the urban edge are used effectively and efficiently; Bullet 3 : the term 'accurately delineated' is questioned and lacks transparency ; Bullet point 5 : Who is going to determine what a critical mass is ?; Bullet 8 : Vague and open to interpretation and open to legal challenge.	4. Urban Growth Management	Bullet 2: The Urban Edge is not envisaged as a tool to make owners develop their land - an infrastructure availability levy would be more useful in this regard. The urban edge has and will continue to facilitate infrastructure master planning and budgeting. Bullet 3: The Urban Edge was first delimited in 2001 and criteria very similar to those recommended by the PSDF were used. There was extensive public participation on the urban edge line in 2001, 2009 and 2010. In addition the Development Edges Policy (draft 2009) was advertised for comment in 2009. The urban edge has ardent supporters and detractors. Bullet 5: the guideline has been edited to be more meaningful. Bullet 8: the comment is valid and the guideline has been amended on the basis of the comment.
110.1	Willie van der Westhuizen	Kine Properties	Current proposed Urban Edge is without scientific backing and should not be implemented as it is currently demarcated. Suggests scientific and technical criteria and professional planning considerations.	4. Urban Growth Management	The Urban Edge was first delimited in 2001 and criteria very similar to those recommended by PG:WC were used. It also went through an extensive public participation process.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
114.2	Willie van der Westhuizen	Western Cape Property Development Forum	Submits that the Deputy Mayor has said that MAYCO does not agree with the current urban edge. According to Alderman Nielsen there is a legislative requirement to put an urban edge in place and this places the city in a difficult position. Working document for the building blocks of an urban edge has not been prepared yet. Can not include a non approved policy (on Development Edges) into the SDF (6.2.4). SDF 6.5 - need to omit the reference to 'portions'. This section does not take into consideration the market realities of the development industry. There would not be employment, public transport, and schooling for subsidy housing residents in the outlying areas and this would perpetuate 'apartheid era planning'. Reference to requirement for low cost and subsidy housing in Table 6.5 needs urgent review, as this would not be viable for developers. Conflict between Table 6.5 and 6.7.	4. Urban Growth Management	The PSDF requires that the City delineate a "medium term Urban Edge as part of the Spatial Development Framework approved in terms of section 4(6) of LUPO. In the absence of the approved "medium term Urban Edge" an "interim Urban Edge" is delineated around existing urban development. The interim urban edge supersedes the urban edge approved by Council in 2001 and is far more conservative than it. The Urban Edge on Map 6.1 that has been delineated compliance with the PSDF requirement will classify as the "medium term Urban Edge upon approval of the CT SDF by PGWC as a structure plan in terms of Section 4(6) of LUPO. The reference to subsidy and gap housing in Table 6.5 (2010 draft) now Table 2.5 (in the 2011 draft) has been edited to address the concerns raised. There is no contradiction between Table 6.5 and 6.7 (2010 draft). Table 6.7 outlines the preferred criteria, especially in the short term. It is recognized that there is a shortage of large sites suited to subsidized housing inside the urban edge for medium term housing delivery and that if the City is to have an impact on the housing backlog it needs elicit the support of the private sector.
114.3	Willie van der Westhuizen	Western Cape Property Development Forum	Densification : Land Availability Study is incomplete / restrictions on development such as title deed restrictions not considered / inadequate eg lack of clarity regarding existing housing backlog. No economic overlay for this study eg land for different economic segments (specifically affordable land for gap housing). Lack of financial feasibility studies for areas for densification (eg Voortrekker Road)	4. Urban Growth Management	The evaluation of developable land within the urban edge was extremely thorough and complete. This study took into consideration restrictions that limit the supply of developable land. Projections have been done for housing land supply requirements and we are confident the sufficient land has been identified for subsidy and gap housing delivery within the time period under review. Urban intensification is proposed along all major public transport routes including Voortrekker Road. The SDF is a long-term plan and it is expected that the "financial feasibility" of densification will change for different areas overtime.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
114.5	Willie van der Westhuizen	Western Cape Property Development Forum	Agricultural : No recognition of DEAP's letter stating that the WCPDF's comments on the Agricultural Land Review 2008 are relevant. The Agricultural Land Review was not done at a level that could help with the determination of an urban edge.	4. Urban Growth Management	DEADP's provisional inspection letter referred specifically to the Philippi Horticultural Area where they recommend that further planning work be undertaken. This is due to circumstances specific to that area. This was confirmed in a further clarification from that department.
114.8	Willie van der Westhuizen	Western Cape Property Development Forum	Incorrect that greenfield developments are at the expense of maintenance and upgrades in existing areas. Refers to the Interim Development Contribution Policy.	4. Urban Growth Management	It is inappropriate to link the upgrading of infrastructure and the approval of the CT SDF. The 15 year growth management plan and the IDP are the appropriate vehicles for managing investment in infrastructure. The comment regarding the structuring of the Development Contribution Policy will be forwarded to the relevant department.
116.1	Gerhard Swart	Urban Dynamics Western Cape Inc.	Motivation for Farm 245 Stellenbosch to be included within the urban edge.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. Suggestion not supported. The property in question is located on good agricultural land and in the transition zone from the CMA to the Stellenbosch Winelands.
117.2	Sydney Holden	Sydney Holden Town Planners/Property Consultants	The principle of urban edge is fully supported, but growth and development in the Eastern District - particularly the Sir Lowry's Pass area - is being under provided for. Need a more liberal approach to urban edge delineation where development pressure is great.	4. Urban Growth Management	A liberal approach to the management of the Urban Edge would undermine the purpose of the Urban Edge. The CT SDF puts forward guidelines for the review of the urban edge. It states that "a City led, proactive review of portions of the Urban Edge line must take place a minimum of every 5 years or more frequently if the City deems it necessary. Amendments must be guided by the generic delineation criteria for development edges and policies and the guidelines in this table. They must also be guided by the City's urban growth management strategies, development trends, the availability of bulk infrastructure inside and outside the Urban Edge, new information related to, for example, natural and cultural and heritage resources and the take-up of land inside the Urban Edge.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
117.3	Sydney Holden	Sydney Holden Town Planners/Property Consultants	The coastal development line should be finalized as a matter of urgency. The current Environmental legislation inhibits development located within 100m of the high water mark, irrespective of height above sea level. Eg Gordon's Bay.	4. Urban Growth Management	Agreed
118.1	Gerhard Swart	Urban Dynamics Western Cape Inc.	Motivation regarding urban edge for Helderberg College (Farm 758, Sir Lowry's Pass); Vergenoegd Farm (Farm 653 / 12, Stellenbosch); South eastern portion of Philippi Horticultural Area; Firlands Small Holdings (Farm 959/16,17,41, 42 (Sweet Waters) & Farm 923/11-13 (Berggrond))	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. Suggestion not supported. Only educational development would be supported on the site
119.3	Gerhard Swart		The distinction between a fixed urban edge (no compromise) and a managed urban edge (where more detailed studies are required) should be made.	4. Urban Growth Management	This issue was debated extensively and it was agreed that more in-depth studies were necessary before this could be done. One of the guidelines in Table 5.5 states that "as a general principle where the Urban Edge line has been accurately delineated to protect natural resources (core bio-regional spatial planning categories and select development in buffer areas) it should not be amended".
120.1	Gerhard Swart	Urban Dynamics Western Cape Inc.	Motivation for inclusion of Portion of Rem Farm 758 into urban edge.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. Suggestion not supported. Only educational development would be supported on the site

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
121.1	Gerhard Swart	Urban Dynamics Western Cape Inc.	Motivation for inclusion of Portion 15 of Farm 653, Stellenbosch into urban edge.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. LUPO application underway therefore no comment
122.01	Gerhard Swart	Urban Dynamics	Motivation for amendment of urban edge with respect to South Eastern portion of Philippi Horticultural Area.	4. Urban Growth Management	Minutes of Urban Edge Task Team dated 22 February 2011 : Not discussed. The application submitted i.t.o LUPO was not supported by the City and is currently on appeal.
122.02	Leona Bruiners	PGWC: Rural Development & Land Reform	What are implications for lack of land or proposed solutions under section 3.1.1.	4. Urban Growth Management	Author referred to supporting CTSDf study, 'Evaluation of Developable Land within the Urban Edge' (2010)
122.03	Leona Bruiners	PGWC: Rural Development & Land Reform	Figure 5.15 illustrates the urban landscape growing towards regional town in east, contradicting City in a region notion	4. Urban Growth Management	This map shows the city's future growth path conceptually, it is not considered possible, nor desirable to forecast long term growth and development patterns due to high levels of uncertainty and potential future resource scarcity - more detailed local level planning is required to inform growth.
122.04	Leona Bruiners	PGWC: Rural Development & Land Reform	Relate developable area on policy no 24 to growth projections	4. Urban Growth Management	Author referred to supporting CTSDf study, 'Evaluation of Developable Land within the Urban Edge' (2010)
126.01	GN van Zyl	Self / Property Developers' Forum	This comment substantiates comments from Mr van Zyl and the Property Developer's Forum and their view that the urban edge lacks a proper scientific and professional base. A number of criteria with scoring are put forward as an "personal" evaluation by Mr van Zyl but acknowledging time constraints as well as that planning is "not an exact science".	4. Urban Growth Management	An extremely thorough and extensive exercise was undertaken to evaluate the availability of developable land within the urban edge. We do not agree with the conclusions of the assessment and believe that there are limitation in the assessment framework presented. In addition it is noted that many of the assessment criteria are either impractical or incorrectly scored.
126.02	Mr M A R Khan	PGWC: Water Affairs	Water Conservation and Demand Management is of key importance for any development and planning, but hardly mentioned in the SDF.	4. Urban Growth Management	Policy 30 refers to the encouraging the use of resource efficient and sustainable technologies and development practices.
126.03	Mr M A R Khan	PGWC: Water Affairs	The capacity of the existing bulk infrastructure to carry the additional load also needs to be taken into account when specific areas are identified. You are advised to give more effect to Waste Water Treatment Works in your SDF.	4. Urban Growth Management	Policy 25 : Direct and facilitate urban growth through the deliberate and integrated use of planning, infrastructure provision, and the regulatory and fiscal authority of all spheres of government refers. The revised SDF has given due consideration to the risks based on capacity, condition and operational performance and concerns which impact on effluent quality . Refer to Map 7.3 . The proposed waste water treatment site is indicated on Map 6.1.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
170.02	Willie van der Westhuizen	Rod McPhail (Member of the WCPDF)	<p>A restrictive urban edge is driving-up the cost of land. This constitutes “social engineering” and results in “neo-feudalism” as the poor and middle classes are unable to purchase property. There are multiple international reports on the effect of restrictive land use on the cost of land.</p> <p>Section 6.2.4: Natural assets are protected by NEMA and there is thus no need for the “strangulation of a development edge” A restrictive urban edge is driving-up the cost of land. This constitutes “social engineering” and results in “neo-feudalism” as the poor and middle classes are unable to purchase property. There are multiple international reports on the effect of restrictive land use on the cost of land.</p>	4. Urban Growth Management	<p>The urban edge is not excessively restrictive. A significant amount of developable land is included within the urban edge.</p> <p>The SDF is the appropriate policy mechanism managing and directing urban growth. The urban edge plays an important role in promoting a compact urban form and reducing urban fragmentation. The urban edge is not excessively restrictive. A significant amount of developable land is included within the urban edge.</p>
170.03	Willie van der Westhuizen	Rod McPhail (Member of the WCPDF)	Table 6.5: Should be changed to read: “a minimum of every five years or more frequently if necessary”. The current phrasing suggests that it might not be reviewed every 5 years.	4. Urban Growth Management	Agreed. See amended text in table 5.5: “a minimum of every five years, or as often as it deems necessary”
170.05	Willie van der Westhuizen	Rod McPhail (Member of the WCPDF)	The supply of developable land is reduced by landowners who have no wish to develop but would rather speculate on the future price of land.	4. Urban Growth Management	This has been taken into consideration. Many property owners may not develop their land for a variety of reasons.
170.06	Willie van der Westhuizen	Rod McPhail (Member of the WCPDF)	The SDF is unclear on whether sufficient land is available within the urban edge. The SDF says that there is enough land but then says that the edge may have to move to facilitate subsidised housing.	4. Urban Growth Management	There is enough land for urban growth based on current growth patterns. However, this may not hold true should there be a dramatic increasing in subsidy-housing budgets or a major change in housing delivery policy. In such cases the urban edge will be review as deemed necessary.
170.08	Willie van der Westhuizen	Rod McPhail (Member of the WCPDF)	Densification is supported. But must consider 1) the market, 2) services that need to be upgraded to support densification, and most importantly, 3) a rapid and easy process by which densification can take place. For example, a simple double dwelling application takes over three years.	4. Urban Growth Management	Agreed. See policies: 2 and 22 (facilitating densification) as well as Table 7.4 (critical infrastructural upgrading)

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
	Andre Beukes	First Plan T&R Planners	Comments relating to Ptns 18 and 19 of Farm Uitkamp. Biodiversity plan does not acknowledge site specific information. Agricultural Review Study also ignores site specific information. There are sufficient grounds to amend the urban edge to include the lower portion of the farm Uitkamp for urban development. eg Mayco November 2010 decision.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. LUPO application underway therefore no comment
	DE Faure	Vergenoegd Trust	Vergenoegd is shown as outside the urban edge which compromises their application for rezoning. The Guide Plan indicates the farm as urban. Base studies for demarcation of the urban edge were at too high a level to fix the line in this case. Includes motivation for including the farm within the urban edge.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. Suggestion not supported
	Allen Job		Does not want development of vacant sites in Somerset West	4. Urban Growth Management	Urbanisation requires that the city grows and therefore it is not possible to say that vacant sites should not be developed.
	Johannes Keiper		Cape Town should go up. Must modernize our city into a modern and vibrant city that welcomes new and unique ideas.	4. Urban Growth Management	Agreed, within constraints of legislation, for example the NHRA.
	Henri van Loggerenberg	Erf 9010, Somerset West	Totally against any expansion into open sites within the present suburbs of Somerset West for safety, overburdened infrastructure and increase in rates reasons.	4. Urban Growth Management	Given the urbanisation pressures facing the city it is not desirable that serviced vacant sites are excluded from development.
	Hayley Erasmus	D2 Belami Ridge, Durbanville	Need to protect urban edges at all costs	4. Urban Growth Management	Agreed
	Bertie van Zyl	BvZPlan	Request for an amendment to the urban edge line next to Wallacedene: Ptns of farm Koopmanskloof No 211, Stellenbosch Road.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. Suggestion not supported. The principle of industrial development creating a better buffer between Wallacedene and the agricultural area was accepted. The form and extent of the "industrial buffer" would have to be well motivated by the applicant. Reservations were expressed regarding the use of the whole site for industrial purposes.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
	Karlo Hendriksz	Duncan Bates Land Surveyors	Request for amendment of urban edge line : erf 1 and 3410 Simon's Town, at Glencairn.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2012. LUPO application underway therefore no comment
	Thys Walters	TV3 Architects & Town Planners	Resubmission of LUPO motivation for Bella Riva Lifestyle and Golf Estate development to be included within the urban edge. (Northern District)	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. LUPO application underway therefore no comment
	Geoff Underwood	Planning Partners	CT SDF ignores the reality that exists on the ground and in terms of the law in relation to Farm 940/7 Dassenberg. A portion of this land has already been rezoned to subdivisional area and a subdivision application for 130 stands is being processed ie this land should be designated as 'Urban Development'. Require sufficient opportunity to submit comments before the matter is finally considered by the competent municipal authority.	4. Urban Growth Management	Refer to the recommendations of the PEPCO Urban Edge Task Team held on 22nd February 2011. LUPO application underway therefore no comment
	Hennie Brandt	BCD Town & Regional Planners	Concerned that the proposed Cape West Gateway & International Airport , as well as the logical urban-infill in support of the Blaauwberg to Atlantis Growth Corridor have not been included in the CT SDF.	4. Urban Growth Management	The Airport Systems Study has informed the selection of the proposed airport site. The project in question is recognized as being in the medium to long-term growth path of the city (see Map 5.3).

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
	Girish Gopal	ACSA: CTIA	The CTIA Master plan proposes maximization of the current airport site. The CT International Airport will provide an aviation function in the short, medium and long term. The CTIA's development framework is well suited to the 3 NB strategies of the CTSDf. Suggests specific amendments to text to reflect authors assertion.	4. Urban Growth Management	Current information suggests that a strong case can be made for securing an alternative airport site to meet the long term future aviation needs of the Cape Metropolitan Area. Whilst it is acknowledged that CTIA will remain the city's main commercial and international airport until it reaches capacity, from a forward planning point of view, the proposed expansion and development options for CTIA should not be considered as the only option to accommodate long term aviation needs for the region. As the metropolitan planning authority, the Strategy and Planning directorate has a responsibility for managing land use(s) and ensuring land use compatibility. By its nature, aviation generates substantial impacts on surrounding land uses and has substantial land side support system capacity requirements (ie. transport infrastructure, utility services). It is therefore considered prudent to take a long term view when considering Cape Town's long term aviation requirements. Map 5.4 indicates the existing airport noise cones. ACSA's Master planning has not been approved by the City. Any future runway realignment and/or runway construction will, subject to obtaining the necessary approvals, be accompanied by a shift in the airport noise cones (refer Policy 24).
Comment Theme: Integrated Development					
13.1	Clive Boustred	Get IT Ed	What can I do here and how can we together make CT better place? Emphasis on education, housing, transport and energy.	5. Integrated development	The CTSDf has adopted an integrated economic, social and environmental approach which will guide and manage sustainable urban growth and balance competing demands.
16.1	Noloyiso Njemla		Sharks (shacks ?) & squatters in Joe Slovo and Langa. Housing shortages.	5. Integrated development	Shortage of housing is recognized in the CTSDf. Policy statements include reference to the need to identify land for publicly led housing delivery programmes. Detailed planning will be undertaken at a district level.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
28.3	Luvuyo Mazuli		Build more facilities eg stadium, community hall.	5. Integrated development	A number of social priority action areas detailing the need for community halls and other facilities has been identified in the CT SDF (see Map 7.1). These priority action areas are to be supplemented with action areas identified by the district plans, aligned with sector based strategic and asset maintenance investment priorities and prioritized through the IDP and 15 year growth management plan.
28.5	Luvuyo Mazuli		Provide housing to eradicate informal settlements	5. Integrated development	Policy statements P21, P35, P36 and P38 include reference to the need to transform informal settlements into economically and socially integrated neighbourhoods and that land should be identified for publicly led housing delivery programmes.
50.15	Andy Miles	Property Developers Forum	Inclusionary housing - this would be an unacceptable and fundamental interference in the free market. It is unfair to expect the private sector to bear the risk of undertaking this initiative. The VPADD is far preferable route to try this concept.	5. Integrated development	As the National Department of Housing's Inclusionary Housing Policy is not approved. Reference to this policy has been omitted from the CT SDF.
70.8	Mlamleli Pukwana	Food and Allied Workers Union	Propose that Chapter 6 be restructured to include both functional and thematic elements and an indication of how the City will employ each of the tools of government to achieve policy objectives.	5. Integrated development	Strategies in SDF document are integrated precisely to overcome line dept. silo approach. Policies will be used in evaluation of land use applications and preparation of local level policies. Policy objectives will be achieved through evaluation of development applications to bring about long term prospective change, as well as undertaking of tasks and further studies identified by the CT SDF. Author referred to Ch7 - way forward.
76.06	Ms S.A Sharpe	Barbarossa Residents Group	Safe, high quality res areas = vibrant mix of land-uses?	5. Integrated development	Agreed.
77.02	Marco Geretto & Masilonyane Mokhele	NM Associates Planners & Designers	Rental housing is under-emphasized	5. Integrated development	Policy statement P39 includes reference to the need for the diversification of housing delivery.
80.05	Mr John Wilmot	Durbanville Heritage Society	Concerns about appropriateness of proposed greenfield industrial complex opposite Contermanskloof quarries.	5. Integrated development	Beyond the scope of the SDF, detailed planning will be undertaken at district level.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
82.01	Simone Lilienfeld		Sustainability: SDF is "business as usual". Doesn't outline any strong policies. Need radical changes to the way the city operates in the face of challenges of climate change, waste reduction and addressing Apartheid spatial patterns. Need stronger policies and measures to promote Densification, mixed use development and water use reduction.	5. Integrated development	Policy statements include reference to use of resource efficient and sustainable technologies and development practices and the introduction of development bylaws and policies on sustainable resource use.
85.04	Rod Gurzynski	Kommetjie Residents & Ratepayers Association	Inclusivity and quality of life 3.3.3: Requires well-formulated plan of action supported by public investment. The importance of local knowledge and decentralized planning is emphasized.	5. Integrated development	Agreed, the importance of local knowledge is recognized and will be an important informant to the district plans.
90.04	Mark Noble	V&A Waterfront Development Department	Somerset Hospital site is also a potential site for development. This will help achieve the objective of increased inner-city residential development.	5. Integrated development	Beyond the scope of the SDF, detailed planning will be undertaken at district level.
95.2	Gavin Smith	Greater Cape Town Civic Alliance	SIA - Alienation of public open space should be allowed only by trade-offs guaranteeing more space for riverine corridors.	5. Integrated development	The CT SDF proposes that the city will be characterized by a linked, multifunctional open space system, for reasons including the protection of biodiversity networks, of which riverine corridors form a part. Policy statements also refer to the need for adequate and equitable distribution of recreation spaces and propose that guidelines be formulated in this regard. Any proposed alienation of public open space will need to be assessed in terms of the above policies.
100.23	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Public open space is inadequately dealt with and needs its own section / strategy	5. Integrated development	Policy statement P41 and Table 5.11 refer specifically to the provision of adequate and equitable distribution of recreation spaces, which includes public open spaces.
101.1	Liz Brunette	Constantia Hills Residents Association	P36.2; replace "fair-share approach" with an explanation that cannot be misinterpreted.	5. Integrated development	The 'fair share' approach refers to an equitable distribution approach.
101.11	Liz Brunette	Constantia Hills Residents Association	P37.2 and P37.3; remove "...where they could be settled".	5. Integrated development	Comment considered
101.9	Liz Brunette	Constantia Hills Residents Association	Land reform is a process, not an "activity". It does not have a specific character, function and form and should be removed from the list of activities as it could incorporate all the stated activities	5. Integrated development	Land Reform is referred to as a programme comprising of three interrelated components. A programme can be defined as a process of managing several related projects within an overall objective.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
102.19	Alan Jackson	Greater Lynfrae Civic Association	Where lower income dwellings are built in existing higher income residential areas the impact of these developments on the existing areas needs to be taken into account in the planning and layout of the area. The impact on immediate neighbours needs especially to be considered. It needs to be borne in mind that for most citizens their home is their primary investment and the value of that home figures in their retirement planning, and takes pressure off the state. If this is not done, financial compensation will need to be considered.	5. Integrated development	The policy statement referring to the need to redress existing imbalances in the distribution of different types of residential development will inform planning at the district and lower levels. Environmental, social and economic impacts of any specific development proposals will need to be assessed in terms of applicable legislation ie LUPO and NEMA.
102.21	Alan Jackson	Greater Lynfrae Civic Association	While development of townships and informal settlements is essential a greater social integration in townships and informal settlements is unlikely for a long time to come. We would therefore like to see more attention given to the integration of suburbs closer to job opportunities, which is something about which this policy says very little.	5. Integrated development	The CT SDF seeks to address spatial economic imbalances through a range of policy interventions. Refer to policies P7-P8, P35 and P36
102.45	Alan Jackson	Greater Lynfrae Civic Association	P29 - We like this creative and flexible approach (pending the general acceptance by Civil Society of District SDFs and Local SDFs) which allows for incremental development of informal communities.	5. Integrated development	Comment appreciated
102.49	Alan Jackson	Greater Lynfrae Civic Association	P36 - Support but encourage the City to work with Provincial and National government to make land available cheaply so to enable lower level housing available to more people.	5. Integrated development	Noted, the City is working closely with PGWC on land matters
102.5	Alan Jackson	Greater Lynfrae Civic Association	P37 - Support but note that due to the time this will take, the city must give priority to other means of integration, which it has thus far failed to do.	5. Integrated development	The City has implemented some of the measures outlined in P37 already

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
102.51	Alan Jackson	Greater Lynfrae Civic Association	P39 - We support this policy and the criteria which follow below, pending the general acceptance by Civil Society of District SDFs and Local SDFs. However our concern is around why it is that so much of this work remains to be done.	5. Integrated development	Noted. District and local area planning is to identify land that can be investigated in the short to medium term for a range of publicly led housing delivery programmes.
102.52	Alan Jackson	Greater Lynfrae Civic Association	P40 - We support these intentions, but have serious reservations about the lack of clear indication of how the city plans to do these things. The current trend is for developers to buy land in higher value areas, sub-divide the land and build a number of housing units on it, rendering the resultant housing far more expensive than the initial housing. How will the city promote a better mix of people in such communities? Density alone will therefore not achieve the required results.	5. Integrated development	District and local area planning is to investigate area specific guidelines regarding a greater mix of land uses, people and / or densities.
103.3	Patrick Dowling	WESSA	P38-39 - Housing policy must be more needs driven than profit driven	5. Integrated development	Noted, however the involvement of the private sector is inherently profit driven
103.31	Patrick Dowling	WESSA	Support objective of creating recreational space within 200m-750m;	5. Integrated development	Comment appreciated
117.4	Sydney Holden	Sydney Holden Town Planners/Property Consultants	The City should identify land at scale for affordable housing across the metropole, in close proximity to public transport and job opportunities and irrespective of land ownership. .	5. Integrated development	The CTSDf sets out a strategy that includes a fair share approach to the identification of land and / or housing opportunities for affordable housing. The CTSDf also refers to the use of state owned infill sites for such residential development. Policy statements also refer to the need to increase low income earners access to affordable housing that is located close to the city's economic opportunities. Detailed planning will be undertaken at the district level, within the CTSDf's policy context.
117.41	Leona Bruiners	PGWC: Rural Development & Land Reform	The policies in P32-35 are in line with the DRDLF mandate to create vibrant equitable rural communities and ensure food security for all.	5. Integrated development	Creating vibrant and equitable communities is a goal of the CTSDf.

Comment Theme: Quality of Built Environment

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
6.9	Prof Susan Parnell	Dept Env & Geogr Sciences, UCT	Indicate beach toilets/change rooms	6. Quality of built environment	The CTSDf is applicable at a city wide scale. The detail raised by the author is beyond the scope of the framework. District and Local level planning frameworks are a more appropriate forum to address the authors suggestions.
28.1	Luvuyo Mazuli		Beautify the City, esp along roads	6. Quality of built environment	Policy Statements 48 and 49 refer specifically to scenic routes. More detailed planning is to be undertaken at the District or lower level planning stage.
28.2	Luvuyo Mazuli		Plant more flowers, etc to improve environment	6. Quality of built environment	Policy Statement 42 proposes the introduction of urban design policies which will promote aesthetically appealing settlements.
41.1	Rowan Dent	Gordon's Bay Residents Assoc	The Gordon's Bay, Sir Lowry Pass and Helderberg area is well known for its sense of place qualities relating to scenic beauty and rural agricultural areas. This sense of place needs to be maintained.	6. Quality of built environment	Policy statement 42 refers to the preparation of urban design guidelines that promote the existing or desired sense of place as part of the assessment of development applications.
55.5	Ms HMJ du Preez	Dept Cultural Affairs & Sport	Recommended that greater attention be paid to encourage design with a high aesthetic value.	6. Quality of built environment	Policy Statement 42 proposes the introduction of urban design policies which should inform the design of contextually appropriate, well structured and aesthetically appealing settlements, and promote the existing or desired sense of place.
55.8	Ms HMJ du Preez	Dept Cultural Affairs & Sport	Suggested that a map showing scenic and historic routes be included in all District Plans and that a guideline for their management and protection be included as part of the SDF.	6. Quality of built environment	Policy Statements 48 and 49 refer specifically to scenic routes. More detailed planning is to be undertaken at the District or lower level planning stage.
61.3	Frank Wygold	Cape Environmental Trust (CAPTRUST)	Scenic routes and vistas should be respected and not degraded by ill-placed permanent structures. Public open spaces should not be compromised or alienated to greedy development.	6. Quality of built environment	Policy Statements 48 and 49 refer specifically to the management of land uses and other interventions along identified scenic routes.
76.07	Ms S.A Sharpe	Barbarossa Residents Group	Agri: NB of retaining Constantia Agricultural areas	6. Quality of built environment	Constantia Winelands has been proposed as a conservation worthy cultural landscape in the CTSDf. In addition, the protection of valuable agricultural land from urban encroachment is proposed by the CTSDf.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
76.1	Ms S.A Sharpe	Barbarossa Residents Group	Heritage: 6.3.5: Concern that Constantia Heritage Assets Inventory is not included in detailed planning for Southern District	6. Quality of built environment	The City has prepared a heritage resources inventory for the city area, including Constantia, as required by the NHRA when preparing the SDF.
76.11	Ms S.A Sharpe	Barbarossa Residents Group	Scenic Drives: Concern that Constantia scenic drives have been left off	6. Quality of built environment	CTSDF has included all scenic routes as listed in the Scenic Drives network - Volume 1: Study Report (1998) and proposes that this report be reviewed with the intention of identifying additional scenic routes
78.01	Brent O'Callaghan		Historical areas worthy of greater protection are highlighted. These include Woltemade Cemetery, Maitland (neglected) and the areas of Harrington Street (East City), Keerom Street, Bantry Bay, Church Square, Gardens Centre. Drawing on the history of just one CT family, this comment demonstrates the importance of the city's rich heritage and how it has meaning for its residents.	6. Quality of built environment	The City has prepared a heritage resources inventory for the city area, as required by the NHRA when preparing the SDF.
79.01	Mr Gideon Roos	FirstPlan Town & Regional Planners	Comment on behalf of Lourensford Properties re Remainder of farm Lourensford 741, Somerset West. Request that Lourensford be accommodated as a "special place that will facilitate processing of a future planning application...". Detailed supporting motivation is provided (see original comments).	6. Quality of built environment	Identification of new destination places is to be informed by the criteria as listed in the CTSDF.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
80.01	Mr John Wilmot	Durbanville Heritage Society	Heritage: Historic cape farms and renosterveld of Tygerberg and Mosselbank river area need greater protection / map overlay for heritage protection. Need more space for riverine corridors (also greenbelts/buffer zones). Related concerns outlined re the loss of agri land and negative impacts on tourism. Concerns raised about MAYCO decision on proposed Uitkaap development.	6. Quality of built environment	Cultural landscapes , such as historic Cape farms, have been included in the heritage inventory as required by the NHRA.
84.05	George Sieraha	Durbanville Community Forum	Heritage: Durbanville wine farms, other agriculture and views must be protected in the SDF	6. Quality of built environment	Cultural landscapes , such as historic Cape farms, have been included in the heritage inventory as required by the NHRA.
86.06	Geoff Neden	Far South Peninsula Community Forum	Scenic routes are a key economic generator. Identification of scenic routes should be expanded (P50 pg66). Environmental Impact Zones should include scenic routes (Table 6.3 on pg47)	6. Quality of built environment	Policy Statement 49 proposes that additional scenic routes be identified. Where appropriate, overlay zones in the draft CTZS will be used to achieve statutory protection of visual and scenic qualities along listed scenic routes
90.03	Mark Noble	V&A Waterfront Development Department	Built form: P44: Approved urban design frameworks for the V&AW should be considered P45: Unclear if this policy requires socio-economic assessment as required by National Heritage Resources Act. This policy should incorporate socio-economic benefits of development.	6. Quality of built environment	CTSDF has been prepared at a broad metropolitan scale and refers to generic urban design guidelines only. All requirements of the NHRA will need to be met.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
91.01	Andre Engelbrecht	CapeWest Pavilion Holdings	<p>Submission includes details of a proposed development on Blaauwberg Beachfront near the existing Dolphin Beach development. The proposal includes plans for a pavilion, harbour and an associated small craft marina in the existing wetland directly to the East of Dolphin Beach, and a cannal connecting Rietvlei to the sea.</p> <p>It is proposed that this area be included as a "Destination / Special Place" in light of this proposed development. Further comments (points 1 to 57) and four "special notes" are provided. Points 1 to 13 generally detail how the proposed development concurs and supports the goals and principals of the SDF, while points 14 to 57 provide further comment on the SDF mostly in terms of how it relates the proposed development. Submission includes details of a proposed development on Blaauwberg Beachfront near the existing Dolphin Beach development. The proposal includes plans for a pavilion, harbour and an associated small craft marina in the existing wetland directly to the East of Dolphin Beach, and a cannal connecting Rietvlei to the sea.</p>	6. Quality of built environment	Beyond the scope of the CT SDF, detailed planning to be undertaken at District level.
92.1	Matthew Gray	Matthew Gray Architects & Urban Designers	<p>Understood that the CT SDF needs to be flexible to accommodate change, but does the SDF has sufficient 'teeth' to enforce appropriate urbanism. There is a 'gap' between planning and architecture. There is an omission in development process to consider urban design in the course of development for the urban environment. The net effect is that urban environments continue to develop in a disjointed and unsatisfactory way.</p>	6. Quality of built environment	Policy 42 proposes the introduction of urban design policies which should inform the design of contextually appropriate, well structured and aesthetically appealing settlements, and promote the existing or desired sense of place.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
92.2	Matthew Gray	Matthew Gray Architects & Urban Designers	Urban design input should be required as part of the development process. No building should be subject to approval in isolation without consideration as to how it fits into its urban context. More extensive developments should be subject to more detailed urban design considerations. All plans submitted for approval should be subject to urban design review as they are reviewed for compliance in terms of zoning restrictions, roads, sanitation, national building requirements etc. Developers must be required to consider urban design input in the same way that architects and planners are required. What can the CTSDf do to give effect these considerations to address this longstanding 'gap' in the planning law process. To what degree can it be stipulated in the CTSDf that development proposals (at least those over a certain size or as at the discretion of the City) be required to submit proper urban design proposals as part of the submission process for review in order to ensure that development proceeds in line with the CTSDf. If not, where else in the land use management process can this long overdue fatal flaw be addressed?	6. Quality of built environment	Policy Statement 42 proposes the introduction of urban design policies which should inform the design of contextually appropriate, well structured and aesthetically appealing settlements, and promote the existing or desired sense of place. Policy P42.2 requests that a package of plans approach is used when planning larger precincts.
93.5	Rory Sales	Noordhoek Conservancy	Recommend that the scenic drive overlay include Noordhoek main road.	6. Quality of built environment	The CTSDf includes a specific action to review and update the Scenic Drives Network - Vol 1 : Study Report (1998)
94.14	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Rural character of Sir Lowry's Pass Village needs to be protected as with Mamre (heritage – rural settlement), see policy 33 and policy 45.1 and policy 48.1	6. Quality of built environment	Policy Statement 43 proposes that heritage resources, including cultural landscapes, be identifies, conserved and managed. Specific actions include the introduction of an Overlay Zone in the new CTZS. Designation of specific further places needs to form part of the District planning stage.
94.15	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Sir Lowry's pass village needs to be identified as a scenic route – policy 50 and 51	6. Quality of built environment	The CTSDf includes a specific action to review and update the Scenic Drives Network - Vol 1 : Study Report (1998)

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
94.16	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Sir Lowry's pass village needs to be identified as a tourist / heritage destination like Mamre mission station, policy 52	6. Quality of built environment	Identification of new destination places is to be informed by the criteria as listed in the CTSDF.
94.17	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Map 6.9 should include Sir Lowry's Pass Village as a tourist / heritage destination along a scenic route (Sir Lowry's Pass Village Rd, M9) – cf. Noordhoek area	6. Quality of built environment	Identification of new destination places is to be informed by the criteria as listed in the CTSDF.
95.53	Gavin Smith	Greater Cape Town Civic Alliance	P6 - We are concerned that there are no Land Use Management Guidelines in this regard, and that this may indicate that this regional work has not yet been done. Natural Assets must include Scenic routes (both currently proclaimed and others) and Vistas.	6. Quality of built environment	The City regularly undertakes discussion with its neighbouring municipalities and also circulates all proposed policy frameworks to them for comment. Policies 48 and 49 refer specifically to the protection of scenic routes.
95.67	Gavin Smith	Greater Cape Town Civic Alliance	P28 - Densification can only be accepted if there is sufficient infrastructure to support it Strategic Environmental Assessment must be a prerequisite to enable understanding of all the impacts and to mitigate any negative impacts including 'sense of place'.	6. Quality of built environment	The CTSDF promotes appropriate land use intensification where there is available and adequate infrastructure. Determination of density is to be guided by contextual informants such as the natural environment and sense of place.
96.23	Simon Liell-Cock	Far South Peninsula Community Forum	In the draft SDF Technical Report Kommetjie Road has been downgraded from a Scenic Route to a Development Route.	6. Quality of built environment	Portion of Kommetjie Road has been designated as a scenic route in terms of the Scenic Drives network - Volume 1: Study Report (1998) and this roads classification as a development route is not contradictory.
96.33	Simon Liell-Cock	Far South Peninsula Community Forum	All routes that are scenic, where visitors go from all over the world, need to be included as Scenic Routes and enjoy management in terms of Policy 50 (Page 66), not just those that have been 'declared'.	6. Quality of built environment	Policy Statement 49 proposes that additional scenic routes be identified to supplement the list in the Scenic Drives network - Volume 1: Study Report (1998).
96.34	Simon Liell-Cock	Far South Peninsula Community Forum	Environmental Impact management zones must include Scenic Routes (Table 6.3 Page 47).	6. Quality of built environment	Where appropriate, overlay zones in the draft CTZS will be used to achieve statutory protection of visual and scenic qualities along listed scenic routes
100.24	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Heritage is ignored by CTSDF, needs its own section / strategy	6. Quality of built environment	Heritage protection is directly addressed in Policies 43 to 46.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
101.12	Liz Brunette	Constantia Hills Residents Association	P44 - Architects must be involved in developing these guidelines.	6. Quality of built environment	Noted. The City does have architects / urban designers on the staff of the Spatial Planning and Urban Design Department, who will be responsible for drafting the urban design guidelines.
102.48	Alan Jackson	Greater Lynfrae Civic Association	P48 - note with concern that the importance of the spiritual legacy of Princess Vlei has not been appreciated.	6. Quality of built environment	Policy Statements 46 and 47 refer to the need to celebrate and reinforce Cape Town's diverse historical legacies and to provide positive spaces for cultural and social ceremonies and life- related events. More detailed planning is to be undertaken at the District or lower level planning stage.
103.13	Patrick Dowling	WESSA	In terms of the NHRA, Section 30(5), the City of Cape Town must compile an inventory of heritage resources within its area of jurisdiction – we would like to see (1) registration of conservation-worthy buildings (2) dedicated building inspectors with specific training (3) extension of conservation areas to include Art Deco buildings and other key elements of tourism industry;	6. Quality of built environment	The City has already prepared a heritage resources inventory which will be submitted to the Provincial Authority as required by the NHRA.
103.29	Patrick Dowling	WESSA	Trend from short term profit driven development applications to compromise high quality destination places must be countered;	6. Quality of built environment	Policy 50 aims to protect high quality destination places in the land use management process.
103.32	Patrick Dowling	WESSA	P44 – support notion of built form design enhancements but this must go beyond aesthetics and include elements of sustainability and social integration in natural surrounds;	6. Quality of built environment	Policy Statement 42 proposes the introduction of urban design policies which should inform the design of contextually appropriate, well structured and aesthetically appealing settlements, and promote the existing or desired sense of place.
133.01	Jane Meyer	Mouillepoint Ratepayers Association	Beach Rd classification as a scenic route is supported. However, maintenance of the publically-owned seaward side is lacking in certain areas (for example the gravel parking areas in Mouille Point) and is not consistent with its scenic route classification. This should be addressed in the SDF.	6. Quality of built environment	Comment noted. However, the maintenance of public land is beyond the scope of the SDF.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
170.07	Willie van der Westhuizen	Rod McPhail (Member of the WCPDF)	The SDF states: "The unique character of an area must be retained where an amendment to the edge is proposed". How will this be possible if edge amendments are only made for mass subsidy housing developments?	6. Quality of built environment	Comment has merit.
Comment Theme: Baseline Information					
37.3	Alan Dolby	Constantia Property Owners' Association	Urges incorporation of the recommendations of "Agricultural Land Review" dated 2008 into the CTSDf and District Plans.	7. Baseline info	The Agricultural Land Review Study, 2008, is/was an important informant. We believe that the recommendations have been adequately incorporated in the relevant sections of the CTSDf.
41.6	Rowan Dent	Gordon's Bay Residents Assoc	Request a consultative and interactive re-evaluation of the 'Agricultural Land Review with regard to Sir Lowry's Pass Village and Gordon's Bay.	7. Baseline info	Proposals for the Sir Lowry's Pass Village have been reviewed. Small holding areas fall outside of the Agricultural Land Review Study (2008) brief. Author directed to Policy 43 which proposes that heritage resources, including cultural landscapes, be identified, conserved and managed. Specific actions include the introduction of a Overlay Zone in the new CTZS. Designation of specific further places needs to form part of the District planning stage.
49.2	Theo Steyn	NuPlan Africa	The argument that Melkbosstrand has enough vacant land within the urban edge (60 ha according to SPUD) is not true. This vacant land is owned by the CoCT and is not available for development.	7. Baseline info	Urban growth and the availability of sufficient vacant land is best addressed at a regional or metropolitan level rather than at a local level.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
50.5	Andy Miles	Property Developers Forum	The City's analysis of available land - 'Evaluation of developable land inside the Urban Edge' is not adequate. Need to do an investigation to establish how the land supply market actually works so that the real land availability forecast can be determined. Need to understand the land supply dynamics. The potential risks of continuing to plan on the present level of understanding of the land supply dynamics include abnormal increases in land prices, speculative participation and that the Gini coefficient will move in an adverse direction. We will see a failure of the land supply to meet market needs.	7. Baseline info	A comprehensive evaluation has been completed of land availability within the urban edge and the expected rate of development. Estimates of land available for development that were used were conservative and made allowance for factors that may limit development including that some areas will not be attractive to developers. We feel confident that enough developable land exists within the urban edge for the timeframes specified. The urban edge will be reassessed on a regular basis. The comment is noted for future urban edge assessments.
59.2	Monica Sutherland	RRR&BA	No enough information on various aspects like the second airport.	7. Baseline info	The Airport Systems Study (2001) describes the rationale for a secondary airport and proposed a site south east of Atlantis - this is indicated conceptually on the CT SDF maps. It is unclear what type of further information should be provided. Further information on the planning / making provision for a possible second airport is available on request.
61.1	Frank Wygold	Cape Environmental Trust (CAPTRUST)	CoCT does not command reliable data on population growth and movement for the city and environs on which to base its planning.	7. Baseline info	To the best of our knowledge the best available information sources have been used. This was sourced in consultation with specialists and use projections developed by the Department of Actuarial Studies, UCT.
70.2	Mlamleli Pukwana (food and allied workers union)		Concerned about information on which the SDF was based. No comprehensive 'status quo' assessment outlining eg strengths and trends with spatial implications. 'Driver of urban growth' should be but one sub issue in a strategic impact assessment of the current reality. Suggests that factors that caused failure if MSDF are still present eg corridors and nodes remain virtually the same. Quotes MSDF review undertaken in 2003 whose conclusions remain relevant.	7. Baseline info	Authors comments considered in redrafting of the CT SDF. MSDF review was an informant into the CT SDF. Author referred to supporting studies which provide more detailed informational assessment (Appendix B).

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
70.3	Mlamleli Pukwana (food and allied workers union)		The section of the availability of land provides inadequate information. Eg the need for land as opposed to the availability of land.	7. Baseline info	Estimates of land available for development used were conservative and made allowance for various factors that limit development. Author referred to <i>Evaluation of Developable Land within the Urban Edge (2010)</i> Estimates of land available for development used were conservative and made allowance for various factors that limit development.
70.31	Leona Bruiners	PGWC: Rural Development & Land Reform	Request info in Table B4 to be included in CTSDF	7. Baseline info	It is not possible nor desirable to include all of the baseline info in the CTSDF. A concise summary of findings of these studies is presented in CH 3, with the principle recommendations being reflected in Ch 4,5,6,7.
77.01	Marco Geretto & Masilonyane Mokhele	NM Associates Planners & Designers	Need better contextualisation of city regionally / globally and implications Would be helpful to map eco activity other than finance and new developments Need better contextualisation of city regionally / globally and implications	7. Baseline info	Please refer to supporting documentation including the 'Analysis of the Spatial Economy of Cape Town' document listed in Appendix B.
85.01	Rod Gurzynski	Kommetjie Residents & Ratepayers Association	South peninsula has an unique geography and unique economic assets. Thus need local/geographically defined investigations (section 3.3.1)	7. Baseline info	There is merit to this suggestion. Analysis at the District Plan level will provide more geographically defined information.
93.12	Rory Sales	Noordhoek Conservancy	Omission of agricultural areas in Noordhoek conservancy. Agri areas need to be identified and included in the CTSDF (horse, cattle grazing) as these will become more important as food prices escalate and demand for edible crops increases. Recommend that City encourage diversification of food production by creating rates and service charges which encourage farming (food security plan)	7. Baseline info	Agricultural areas inside the urban edge were not part of the agricultural land study. They are recognised and discussed in the area specific land use guidelines in the District Spatial Development Plans.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
94.1	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	The Agri-Land review document exhibits a lack of knowledge of the Community Tourism Project – Sir Lowry's Pass Tourism and Business Development Trust (SLPT&BDT). Request a complete, consultative and interactive re-evaluation of the Agri land review document (Report 1498/2) which informs the SDF and District Plan specifically as it relates to the Sir Lowry's Pass and Village Area, and the Community tourism project.	7. Baseline info	Proposals for the Sir Lowry's Pass Village have been reviewed. Small holding areas fall outside of the agricultural Land Review Study (2008) brief. Author directed to Policy 43 which proposes that heritage resources, including cultural landscapes, be identified, conserved and managed. Specific actions include the introduction of a Overlay Zone in the new CTZS. Designation of specific further places needs to form part of the District planning stage.
94.3	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Re: Agri – Land Review: 1.1.1 Helderberg – Sir Lowry's Pass Road – the Agricultural Potential has neither been investigated fully from a historical perspective nor does it appear that proper soil sampling and a review of potential crops been undertaken. The author contends that this view is based on outdated farming practices and does not consider modern technology and the strong trend towards organic and sustainable farming practices which can render small scale farming a viable and sustainable option;	7. Baseline info	Proposals for the Sir Lowry's Pass Village have been reviewed. Small holding areas fall outside of the agricultural Land Review Study (2008) brief. Author directed to Policy 43 which proposes that heritage resources, including cultural landscapes, be identified, conserved and managed. Specific actions include the introduction of a Overlay Zone in the new CTZS. Designation of specific further places needs to form part of the District planning stage.
94.5	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Re: Agri – Land Review: QRSTUV – 'area of low potential' – Tre Donne was previously an export fruit farm in support of which the Government funded the construction of the Toll House Dam. In light of this the liberal allocation of "Low Agricultural Potential" should be reviewed.	7. Baseline info	Noted. The Agricultural Land Review study took cognisance of a large number of factors. For example the overall size of the continuous agricultural area was an important factor. Please see full write up of Agricultural Land Review Study
94.6	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Re: Agri – Land Review: The area falling within the Kogelberg Biosphere should be protected as it is the Gateway to Cape Town and the special character of the mountain ranges should be preserved and conserved for inhabitants and visitors. Many fine opportunities will be lost if the Sir Lowry's Pass Mountains end up covered in buildings;	7. Baseline info	Policy P42 recognises the importance of gateways and Map 5.8. indicates gateways linked to the Kogelberg Biosphere and Sir Lowry's Pass.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
94.7	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Re: Agri – Land Review: WKX – Spring Waters is labeled as an 'area of low potential' – this area is situated at the Gateway to Cape Town and should remain a 'green interface' with the Biosphere	7. Baseline info	Policy P42 recognises the importance of gateways and Map 5.8. indicates gateways linked to the Kogelberg Biosphere and Sir Lowry's Pass.
94.8	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Re: Agri – Land Review: KJY – Firlands is labeled as an 'area of low potential (All crops)'. This area was under vines when subdivision was granted.	7. Baseline info	The Agricultural Land Review study took cognisance of a large number of factors. For example the overall size of the continuous agricultural area was an important factor. Please see full write up of Agricultural Land Review Study
96.9	Simon Liell-Cock	Far South Peninsula Community Forum	We believe that it is not possible to plan effectively without accurate population data for the Far South. The 2001 census states that there are 56 200 people in the Far South. This is out of date and a new census needs to be carried out to inform the SDF.	7. Baseline info	To the best of our knowledge the best available information sources have been used. Area-based population estimates, which take urban growth after the 2001 Census into account, were used.
98.8	Rod MacPhail	Vergenoegd Estate	City planners do not understand agricultural economics. The Department of Agriculture is the appropriate institution to provide input into what is sustainable – recommend that proposal be deleted.	7. Baseline info	Decisions over whether to conserve or develop rural areas involve many considerations. Broader spatial planning considerations are important as are issues of agricultural sustainability. Author directed to previous comments schedule wherein the department of agriculture submitted comment on the previous draft of the Cape Town SDF and expressed their support for the CTSDf proposals.
101.8	Liz Brunette	Constantia Hills Residents Association	The Tokai Park (part of the Table Mountain National Park) is identified as an agricultural area but in 25 years time it will not be used for forestry/agriculture. It should therefore be a "Rural" category rather than an "agri-area of significant value". CPPNE identified in the legend is not described in the "Acronyms & Abbreviations" at the beginning of the document.	7. Baseline info	The CTSDf is a 30 year plan, but it will be reviewed periodically which will provide opportunity to update relevant mapping aspects. Definitions have been updated to include CPPNE.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
102.12	Alan Jackson	Greater Lynfrae Civic Association	There are a number of pressing issues requiring urgent attention, but we are concerned these are not happening consistently (including: inaccurate population information, apartheid development patterns, failure of low income housing to display qualities of an integrated human settlement, provision of infrastructure to Greenfields development at expense of upgrading existing infrastructure and unsustainable land consumption	7. Baseline info	To the best of our knowledge the best available information sources (including that for population) have been used. Concerns regarding development patterns, quality of settlements and infrastructure are highlighted and addressed in the relevant sections of the CT SDF.
102.18	Alan Jackson	Greater Lynfrae Civic Association	Unclear about what distinction is being made between the scenarios in figure 3.10. This error is of major concern to us as it is crucial to understand what scenarios the city considers is most likely, and it indicates once again that errors will occur when planning is insufficiently rigorous and policies are pushed through without sufficient thought given to the implications of these policies.	7. Baseline info	It is important for planning to acknowledge an uncertain future and to be sufficiently adaptive in order to manage growth in a range of different future scenarios. It is not possible to anticipate the future and it is therefore necessary to consider historical trends and alternative future scenario's, as has been undertaken in the CT SDF.
102.23	Alan Jackson	Greater Lynfrae Civic Association	P2: The city is very unclear about the current population figures and is therefore not at all clear about the figures going forward.	7. Baseline info	To the best of our knowledge the best available information sources have been used. This was sourced in consultation with specialists and use projections developed by the Department of Actuarial Studies, UCT.
106.2	Yachita Reddy	Sustainable Energy Africa	A more detailed explanation of what peak oil is and the likely impacts is required under section 3.1.2	7. Baseline info	Agreed. Section 3.1.2 has been amended.
19,1	Philip Fourie		Are we not underestimating exponential population growth?	7. Baseline info	To the best of our knowledge the best available information sources have been used. This was sourced in consultation with specialists and use projections developed by the Department of Actuarial Studies, UCT.
Comment Theme: Other					
2.1	Bob Schuiling		How does SDF impact on Home Owners Assoc?	8. Other	The SDF provides long-term direction to urban growth and urban structure. It provides guidance for lower-level plans and planning applications.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
4.1	Schaapkraal Civic & Environmental Association	SCEA Schaapkraal Civic & Env Assoc	We would like to comment on the SDF / will attend workshops	8. Other	We would like you to attend and comment to improve the quality of the document.
7.1	Deon van Zyl		Perceived discrepancy between SDF and District Plans public process. Will District Plans have 'last' public participation process /	8. Other	The district plans will, subject to the endorsement of the Planning and Environment Portfolio Committee, proceed through the third and final phase of public engagement, which should be initiated in March / April 2011.
11.1	Len Swimmer	Greater Cape Town Civic Alliance	Object to splitting workshops in 5 groups	8. Other	The workshops were divided up into 5 interest groups in order to allow for more in-depth discussion on specific topics. The public / interest groups were free to attend all workshops if they so desired.
15.1	Clive Boustred	Get IT Ed	Compliments on outstanding SDF Technical Report	8. Other	Compliments appreciated.
20.1	Diana Borchers		Request info on future meetings, esp Helderberg area	8. Other	The district plans will proceed through their final phase of public engagement in March / April 2011. The process will include open days and an advertising period during which written comments may be submitted.
24.1	Christo Kannenberg	Planning Partners	Vision statement too vague; also need goals & objectives eg should refer to 'sustainable'	8. Other	Goals are unpacked in the following section (refer 1.2.2)

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
24.3	Christo Kannenberg	Planning Partners	Questions whether the Southern Corridor (Lansdowne Road) will ever be developed ? Should rather focus on areas which have already illustrated their ability to attract investment..	8. Other	The CTSDf acknowledges that despite previous planning attempts to encourage investment, the southern corridor has, for most of its length remained a 'developing corridor' which has attracted limited 'formal' investment. However, in terms of the city's metropolitan spatial structure, the Southern corridor provides an important E-W linkage between the established Claremont/ Wynberg area, the metropolitan south east sector and the Khayelitsha/ Mitchell's Plain area which is supported by the proposed R300 and parts of the N2. Although the southern corridor currently functions as an intermediate link, it does attract significant volumes of movement along its length. The spatial positioning of the Southern corridor, with its linkages to N-S routes, has the potential for future development that will benefit the space economy of the metropolitan region as a whole. It therefore continues to have long-term potential for corridor development. In addition, it must be recognised that the activities that happen along this route are different from those happening along other corridors in the city, mainly as a result of it being surrounded by low income households, providing opportunities suited to small businesses and having a strong informal character.
29.1	Cheryl Downing	Provincial Treasury	Content has been noted.	8. Other	Comment has been noted
37.1	Alan Dolby	Constantia Property Owners' Association	Commends the City on progress made on metro wide SDF. Need to expedite adoption and proceed to District Plans.	8. Other	Comment appreciated
41.2	Rowan Dent	Gordon's Bay Residents Assoc	Objection to Helderberg being named the Eastern District or District 6. Confusion regarding division of city by various City Depts into 6 or 8 districts.	8. Other	Concerns noted. However, this is not within the scope of the SDF.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
42.2	Kate Snaddon	Western Cape Wetlands Forum	Section 4 : Vision to include '...a diverse and ecologically functioning natural environment..' instead of natural environment'.	8. Other	Authors comment considered in redrafting of the CTSDf. The City vision was adopted from a process currently underway to develop a City Development Strategy (CDS) - there will be an opportunity to revisit the City Vision when this process continues.
50.1	Andy Miles	Property Developers Forum	There was no representation from the Property Developers Forum or other property industry group on the expert review panel.	8. Other	Members of the expert review panel were appointed based on a fair and transparent public tender process. The Review panels input was objective and was not representative of particular lobbies which may have undermined the open, fair and transparent public participation to date.
50.11	Andy Miles	Property Developers Forum	The timing and level of participation of interested and affected parties is potentially legally inadequate. Eg with respect to some land owners who will be directly affected by the proposed urban edge.	8. Other	PG:WC's requirements in terms of s 4(4) of LUPO were that I & AP's be given the opportunity to comment and provide inputs to the drafting of the plan. In this regard, notice had to be given in the local media and a minimum of 60 days allowed for comment. PG:WC recommended that additional steps be taken to bolster public participation in the process, such as workshops, personal notices etc , and these steps were undertaken in line with PG:WC's recommendations.
50.13	Andy Miles	Property Developers Forum	Little or no comment on alternative strategies that were considered and the rationale as to why those suggested are the most appropriate.	8. Other	The three overarching strategies presented by the CTSDf in Ch 5.1, 5.2, 5.3 and provide a comprehensive summation to exploit opportunities and address the challenges confronted by Cape Town city. These strategies reflect the inputs of the city's sectoral policies and the indepth studies outlined in Appendix B.
50.2	Andy Miles	Property Developers Forum	Lack of adequate cross divisional and departmental integration in the City's planning process.	8. Other	Extensive engagement has taken place with other city departments, agencies, State Owned Enterprises and other government departments.
50.7	Andy Miles	Property Developers Forum	Over the last ten years the time and cost of achieving planning approvals have both significantly worsened. This is not investor friendly.	8. Other	Concerns noted. See policy 1 which provides the policy framework within which to address this issue.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
50.9	Andy Miles	Property Developers Forum	Are the City's plans implementable ? No indication of relative priorities. Does the City have resources to deliver on the plans ? Little demonstration of the specifics required for implementation.	8. Other	It is the role of the City's IDP to identify priorities and the budget to align to the IDP in terms of resourcing these priorities. The role of the CTSDf is to give spatial direction in the implementation of these priorities as well as to inform the IDP as to what the spatial priorities should be.
56.1	Shaun Schneier		Suggests addition of words to the 'Vision' statement.	8. Other	Authors comment considered in redrafting of the CTSDf. The City vision was adopted from a process currently underway to develop a City Development Strategy (CDS) - there will be an opportunity to revisit the City Vision when this process continues.
56.4	Shaun Schneier		SDF in several instances uses the word historic instead of historical eg Policy 47 (pg66)	8. Other	Authors comment taken into consideration in the redrafting of the CTSDf.
56.5	Shaun Schneier		Table 8.5 (pg78) mistakenly refers to Map 6.1 which is a transport network map and does not relate to biodiversity.	8. Other	Authors comment considered in redrafting of the CTSDf.
56.6	Shaun Schneier		Many important tasks for protecting the environment are absent from Table G.1 (pg94).	8. Other	Table 7.1 summarizes the necessary in-depth studies, new policies and work streams of citywide significance arising out of the policy statements and development guidelines which pertain directly to forward planning. It does not include all the projects and initiatives currently underway at the City.
57.1	Mike Slayen	Table Mountain National Park	Suggested that the National Park be acknowledged in Policy 19. Suggests specific wording.	8. Other	Author referred to P25, Map 6.3 and table 7.5.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
57.3	Mike Slayen	Table Mountain National Park	Specific comments and corrections to the Acronyms table, Map 3.2, Map 6.1 (with specific reference to Kommetjie Road being shown as a development route) , Map 6.4 (the TMNP Marine Protected Area is shown incorrectly), Map 6.5 (cross reference to Maps 6.1 and 6.3 for contradictory classification of statutorily protected conservation land and specific errors relating to the Tokai Plantation and Constantiaberg and Vlakkenberg inside the CPPNE boundary), Map 6.6 (relating to erf 1 Simons town), Map 6.9 (need to add upper and lower Cable Stations and Boulders Beach as destination places).	8. Other	Authors comment addressed in 4 parts (1) acronym list has been updated (2) the CTSDf supports land use intensification along public transport routes subject to context (refer P22) - Development routes are characterised by nodal type development at key intersections - mixed-use development is already occurring at the identified nodes (Long Beach, Masiphumelele, & Ocean View) - the district plan provides more detailed sub-area management guidelines which are intended, for example, to restrict internodal areas to residential use (3) Map 6.4 (now 5.6) has been updated (4) Map 5.5 and Map 5.7 have been revised (5) Map 5.8 has also been revised. Author thanked for detail and validity of comment.
58.1	David Bettsworth	David Bettsworth T&R Planners	CoCt's intention to move towards a web-based information system is welcomed. CoCt's website should be overhauled in order to improve its functionality.	8. Other	Concerns noted. Authors comment has been submitted to relevant city department.
59.1	Monica Sutherland	RRR&BA	A longer period should have been given for public participation. Document should not be rushed through. Also queries the population figures.	8. Other	The final round of advertising was 3 months. PG:WC have confirmed that the 90 day period for submission of comment by the public is sufficient.
66.5	Arno Hood	Jetsetter Aviation	Suggests extra wordings to various policies eg Policies 28, 36, 39 and 43.	8. Other	Comments considered in redrafting of CTSDf. See amendments to policies.
69.1	Anine Trumpelman	@Planning	Ensure that the SDF is consistent with existing zonings and does not contain any conflicting designations to what has already been approved in the Sheffield Park Industrial area vicinity. Need to check alignment of proposed Sheffield Road and railway line. Urban edge is to be indicated immediately south of the proposed Sheffield Road alignment not running through the industrial area as it is currently indicated on the plan.	8. Other	It has been agreed that the alignment of the Urban Edge north of Philippi Horticulture Area should align with Sheffield Road and that the land uses should align generally with the Lansdowne Rd, Philippi Structure Plan. This comment was discussed with the District planning team to reflect local input and ensure consistency with the relevant District plan.
73.5	Kim Kruishaar	Independent Environmental consultant living in the Far South Peninsula	The CTSDf is an opportunity to define desirable development.	8. Other	Agreed. This is an underlying theme in the document.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
73.6	Kim Kruishaar	Independent Environmental consultant living in the Far South Peninsula	Principles are not translated into strong enough Land Use Guidelines and in some places there are contradictions. Eg the proposed FH by pass freeway shown on map 6.1, identification of Kommetjie Road as a development route, and the determination of the urban edge.	8. Other	Land use policies have been amended to ensure greater clarity and remove contradictions. We believe Kommetjie Road is suited to its designation as a development route and the urban edge has been properly delineated.
76.04	Ms S.A Sharpe	Barbarossa Residents Group	3.2 and fig 3.10 not helpful – don't indicate planning response	8. Other	These figures are included in the analysis section of the document. Planning responses are contained in Ch 4, 5, 6, 7 (revised CT SDF draft).
76.13	Ms S.A Sharpe	Barbarossa Residents Group	Risk management: needs to be communicated to public (App B p82)	8. Other	Comment considered and to be referred to the appropriate city department. The City's disaster management dept. is responsible for Risk Management.
82.02	Simone Lilienfeld		Legal: Expressed view that public participation process was insufficient/ poorly marketed.	8. Other	The City has complied with the statutory requirements regarding the public participation process.
84.02	George Sieraha	Durbanville Community Forum	Legal: Public participation process inadequate. Bias in favour of Developers' forums.	8. Other	The City has complied with the statutory requirements regarding the public participation process. We believe that the process has been fair, consultative and transparent.
87.01	Prof A Katz	University of Cape Town	** Concern that previous comments submitted Nov 2009 were not considered.	8. Other	A schedule of responses to individual comments received in 2009 is publicly available. Those comments of a District Plan nature will be reflected in the District Plans. The District Plans will, subject to the endorsement of the Planning and Environment Portfolio Committee, proceed through the third and final phase of public engagement, which should be initiated in March / April 2011.
89.02	Prof A Katz/ D. Marais / H Epstein	University of Cape Town	** Concern that previous comments submitted Nov 2009 were not considered.	8. Other	A schedule of responses to individual comments received in 2009 is publicly available. Those comments of a District Plan nature will be reflected in the District Plans. The District Plans will, subject to the endorsement of the Planning and Environment Portfolio Committee, proceed through the third and final phase of public engagement, which should be initiated in March / April 2011.

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93.16	Rory Sales	Noordhoek Conservancy	There is an inability of City officials to enforce alien and plant clearing on private and TMNP land	8. Other	Beyond scope of the CT SDF.
93.2	Rory Sales	Noordhoek Conservancy	The CT SDF policy guidelines are open to subjective interpretation – some of them will conflict each other and a hierarchy of policies should be established.	8. Other	Authors concern noted, policy statements have been reviewed and amended to reduce ambiguity and conflict.
95.1	Gavin Smith	Greater Cape Town Civic Alliance	There is presently no formal structure for Civil Society to pro-actively engage with officials specifically on issues concerning planning and development and to learn about the various processes or communicate their concerns as is the case with the property development forums.	8. Other	The City has complied with the statutory requirements regarding the public participation process. We believe that the process has been fair, consultative and transparent. Author is encouraged to lobby for civil society structural engagement with City if and when necessary.
95.13	Gavin Smith	Greater Cape Town Civic Alliance	There has not been an adequate Strategic Environmental Assessment (as required in terms of MSA) prior to finalisation of the SDF. Society needs to know what the impacts of the proposed SDF are and needs to be absolutely clear of all its implications. This can only be communicated through the findings of a rigorous Environmental Assessment. Baseline assessments are required on which to effectively base any judgments on future uses.	8. Other	Chapter 2 of the Local Government: Municipal Planning and Performance Management Regulations of 2001, section 4(f) states that an SDF must contain a strategic assessment of the environmental impact of the SDF. This is an assessment of impacts at a strategic scale and was initiated in 2007. The results of that assessment guided the further development of the SDF. The draft CT SDF now includes a number of relevant policies and guidelines to direct development towards appropriate places and forms, to avoid environmental sensitive areas and resources and to maximise sustainable development. Mapping of Environmental Impact Management Zones has been completed and these are addressed in more detail in the District SDPs and Environmental Management Frameworks. A summary of strategic impacts and possible indicators of the CT SDF is included in the CT SDF appendix's.
95.14	Gavin Smith	Greater Cape Town Civic Alliance	Failure to fully comprehend the impacts and implement required mitigation against negative impacts will result in Cape Town just becoming a Jo'burg by the sea. Actions to mitigate against any negative impacts should become a condition to CT SDF approval	8. Other	A primary focus area of the CT SDF is to mitigate negative impacts. The CT SDF policy statements provide clarity on how this is to be achieved (refer CH 5).

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
95.15	Gavin Smith	Greater Cape Town Civic Alliance	SIA - The public need to know the cumulative impact of the zoning scheme and the SDF on communities	8. Other	The purpose of zoning scheme and SDF is to be part of a long term planning framework to manage growth and change by establishing a land use management system that includes a closer link between zoning control and forward planning (Author referred to section 1.2 of the CTSDf).
95.16	Gavin Smith	Greater Cape Town Civic Alliance	SIA - The Recreational and Health value of the unique environment should be taken into account (Social Priority Action areas)	8. Other	Priority action areas are identified in terms of city-wide criteria, such as backlogs in social infrastructure (refer Ch 7). The CTSDf also includes specific policy statements which give effect to the authors concerns (Refer Ch 5 of the CTSDf). The District Plans will take these policies forward at a district level.
95.17	Gavin Smith	Greater Cape Town Civic Alliance	SIA - The plan makes much of the social justice issue, but this needs to be matched by respect for environmental integrity.	8. Other	Environmental integrity is entrenched through the CTSDf spatial building blocks and the relevant policies. Note that many stakeholders submitted conflicting comments: That the SDF is 'too green' and 'only the environment has been adequately assessed'. We believe that the CTSDf strikes an appropriate level of balance.
95.18	Gavin Smith	Greater Cape Town Civic Alliance	SIA - New population densities have implications for Koeberg's disaster management plan	8. Other	Author referred to Policy 24.
95.2	Gavin Smith	Greater Cape Town Civic Alliance	Many individuals, associations and organisations submitted comment on the draft CTSDf at the latter end of 2009 - There was a legitimate expectation that these submitted comments would be specifically responded to. This however is not the case for numbers of individuals, organisations and associations. Author contends that City did not follow an inclusive process and chose only to respond to a select group of I&AP's in their supplied 'Response to Comments' document. It was, in contrast, apparent that the Developers Forum was very well served in this regard.	8. Other	There will be a further process of engagement for the district plans and this should be initiated in March / April 2011.
95.21	Gavin Smith	Greater Cape Town Civic Alliance	SIA - Human success is determined by a balance of biological, economic, social and political considerations – space is critical for this to happen.	8. Other	Authors notion supported by CTSDf.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
95.23	Gavin Smith	Greater Cape Town Civic Alliance	There is confusion about the interaction between the SDF and CTZS and which has the legal power.	8. Other	The CTSDf provides a strategic vision for the future of the city, while the draft CTZS designates specific use zones (and associated built form parameters) to individual properties. The CTZS's overlay zoning category, whereby policy guidelines (such as those contained in the SDF) can be translated into development rules after following a prescribes process, is a link between the two documents. This is described under section 1.3.
95.26	Gavin Smith	Greater Cape Town Civic Alliance	Desirability criteria need more thought.	8. Other	Authors comment provides insufficient clarity. Consideration of desirability is required in terms of section 36 of the Land Use Planning Ordinance (No. 15 of 1985).
95.27	Gavin Smith	Greater Cape Town Civic Alliance	There should be a whole City economic plan that goes beyond the IDP budget and gives value to the City's natural assets.	8. Other	Author directed to draft framework for a City Development Strategy, Integrated Metropolitan Environmental Policy as well as other policies which have informed the CTSDf (refer Appendix B). We believe the City's natural assets are given appropriate attention in the CTSDf.
95.29	Gavin Smith	Greater Cape Town Civic Alliance	In implementing such a plan there is need for key over-riding principles with appropriate funding and staffing	8. Other	Author referred to Ch 7 - way forward. Principles underlying the various policy statement are provided in Ch 5.
95.3	Gavin Smith	Greater Cape Town Civic Alliance	As has been communicated, where issues are raised of local significance, that these must be diverted to "district level". "If" there is to be any subsequent formal process of engagement at 'district level', and strategic issues are then raised, these will be silenced by the fact that the overarching regional strategic direction would have already been promulgated.	8. Other	The preparation of the CTSDf has been informed by constant collaboration and joint planning between the CTSDf and District Planning teams. The public participation process stage of August 2009 included both the CTSDf and the District Plans. Both local and metropolitan-scale issues have received joint attention. It should also be noted that the CTSDf is a 'principle' document which contains general broad proposals. Detailed planning happens at the District level. However, should the need for review arise following CTSDf approval, these will take the form of amendments if and when necessary (see Ch 7.2).
95.3	Gavin Smith	Greater Cape Town Civic Alliance	The document has a "something for everyone flavor". There is little chance of tangible implementation.	8. Other	This comment is non-specific and thus difficult to respond to. Implementational issues are covered in the implementation section.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
95.33	Gavin Smith	Greater Cape Town Civic Alliance	There needs to be consistency between the Guide Plan, the SDF and district plans	8. Other	The purpose of the SDF is to replace the out-of-date Guide Plan. Extensive consultation has occurred between SDF and District Plan teams.
95.38	Gavin Smith	Greater Cape Town Civic Alliance	Mitigation and rehab must be part of any mining application.	8. Other	Policy 29 and related guidelines address this issue from the City's SDF perspective. The City will continue to engage with the Department of Mineral Resources in terms of monitoring and management of mine areas and rehabilitation.
95.39	Gavin Smith	Greater Cape Town Civic Alliance	With regard to the medium to longer-term time-lines envisaged in the SDF, the actual governing of the uptake on anything reflected as for 'urban development' is non-restrictive and could be a lot quicker than what is intended.	8. Other	It is acknowledged that urban growth could be slower or faster than anticipated. The CT SDF does not give any rights. Areas designated as urban development will have to go through the application process (LUPO and NEMA if necessary) to assess desirability - See section 36 of LUPO.
95.4	Gavin Smith	Greater Cape Town Civic Alliance	Actual engagement with the process is put into question when there is such a low response rate. (less than 300 responses out of a total 850,000 ratepaying households and a population of "3,7 million") is quite unacceptable.	8. Other	125 written responses were received in the Nov - Jan 2011 public participation process. These responses were disaggregated into 655 individual remarks. The City has complied with PG:WC's requirements regarding public participation, as well as those prescribed by the Land Use Planning Ordinance (No. 15 of 1985) and the Municipal Systems Act (No 32 of 2000).
95.4	Gavin Smith	Greater Cape Town Civic Alliance	The document talks of the plan being reviewable but needs to acknowledge that the pace of change limits the extent to which this is possible.	8. Other	Author referred to Ch 7.2 of the revised CT SDF. The CT SDF will be reviewed 'more frequently if deemed necessary'.
95.41	Gavin Smith	Greater Cape Town Civic Alliance	Reviewing is also a double edged sword that allows chiseling away at protection. We need a hard provisional policy.	8. Other	Any review and / or amendment to the CT SDF will have to follow a process of public participation. Submissions from I&AP's will be considered in any review of the document.
96.1	Simon Liell-Cock	Far South Peninsula Community Forum	Where can we see the Environmental Management Framework for our area?	8. Other	The Environmental Management Frameworks are included in the district plans which will, subject to the endorsement of the Planning and Environment Portfolio Committee, proceed through the third and final phase of public engagement, which should be initiated in March / April 2011.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
96.15	Simon Liell-Cock	Far South Peninsula Community Forum	The SDF displays a fundamental problem regarding lost institutional memory. It is clear that there has been a limited transfer of information between departments and new staff. Much of this information is in the hands of the general public and it should have been retrieved and included at an early stage in the process - during the SEA.	8. Other	Chapter 2 of the Local Government: Municipal Planning and Performance Management Regulations of 2001, section 4(f) states that an SDF must contain a strategic assessment of the environmental impact of the SDF. This is an assessment of impacts at a strategic scale and was initiated in 2007. The results of that assessment guided the further development of the SDF. The draft CTSDf now includes a number of relevant policies and guidelines to direct development towards appropriate places and forms, to avoid environmental sensitive areas and resources and to maximise sustainable development. Mapping of Environmental Impact Management Zones has been completed and these are addressed in more detail in the District SDPs and Environmental Management Frameworks. A summary of strategic impacts and possible indicators of the CTSDf is included in the CTSDf appendix's.
96.16	Simon Liell-Cock	Far South Peninsula Community Forum	It is unacceptable that an SEA was undertaken without public participation. The SEA should thus be reviewed in light of all the comments received in this process to reflect on the environmental and heritage impact of those plans"	8. Other	The CTSDf was submitted for provisional inspection on the 4th August 2010 in terms of Section 4(5) of the Land Use Planning Ordinance, 1985 (Ordinance 15 of 1985) by the Department of Environmental Affairs and Development Planning (DEADP). The official response from the DEADP indicated a general satisfaction with the content of the CTSDf and furthermore, that the process followed, as stipulated in the Section 4(1) approval letter, is deemed to be sufficient up to the Section 4(4) requirements of LUPO, which enables the City to progress to the next step of the approval process which is described in Section 4(5) of LUPO. It is on this authority that the final round of representations, responses to objections etc. has been set in motion.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
96.18	Simon Liell-Cock	Far South Peninsula Community Forum	Information used for the Geographic Information System (GIS) and the Spatial Development Plan (SDP) was based on limited interviews with the assessment team and therefore reflects their opinions. Information was thus not independently verified. If the SEA had been subject to a public process, the Planning Team would have been made aware of the number of studies already undertaken in respect of the Noordhoek Wetlands.	8. Other	It is not clear what specific information or opinions is being referred to. The CTSDf has been subject of two extensive public participation processes. We believe comments on specific gaps or inadequacies in information have been received and addressed.
96.2	Simon Liell-Cock	Far South Peninsula Community Forum	When will District Plans come out?	8. Other	The district plans will, subject to the endorsement of the Planning and Environment Portfolio Committee, proceed through the third and final phase of public engagement, which should be initiated in March / April 2011.
96.3	Simon Liell-Cock	Far South Peninsula Community Forum	If the Draft SDF Technical Report provides guidelines for the new CTZS, how could we be required to give input on the CTZS before seeing the SDF and in particular the Spatial Development Plan (SDP) for District H (Page 7 of the Report)?	8. Other	There has been a close working relationship between the drafters of the two documents and both these documents have been endorsed by the same political structure. A legal option obtained by Council in this regard advises that there is no legal impediment on drafting the CTZS and CTSDf in parallel or even approving the CTZS before the CTSDf.
96.31	Simon Liell-Cock	Far South Peninsula Community Forum	The Social priority action areas (Table 8.1, page 74) should include Recreation in the Natural Environment such as areas needed for hiking, beachgoing, boating, etc.	8. Other	The intention of this section it to help prioritise the provision of facilities in communities where they are under provided. Recreation and public open space is considered. Often such areas are lacking in qualitative natural areas.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
96.35	Simon Liell-Cock	Far South Peninsula Community Forum	The vision statement in the Draft SDF Technical Report is general and could appertain to many cities. Cape Town is, however, special in that it is the only city which has a National Park and World Heritage site in its midst. A possible alternative could accordingly read: "To, by 2040, ensure that Cape Town is an inspiration to the world showing how urban planning sensitive to the surrounding unique natural heritage is able to sustain an economically vibrant City which enriches the health and well-being of all who live in it or are attracted to visit it."	8. Other	Authors comment considered in redrafting of the CTSDf. The City vision was adopted from a process currently underway to develop a City Development Strategy (CDS) - there will be an opportunity to revisit the City Vision when this process continues.
96.36	Simon Liell-Cock	Far South Peninsula Community Forum	We commend the compilers on a report which contains a wealth of information, good concepts and policies, is easy to read and understand and has a format that facilitates easy reference.	8. Other	Comment appreciated.
96.37	Simon Liell-Cock	Far South Peninsula Community Forum	It is our opinion that, in general, any part of an Act or Policy which leaves too much to the discretionary powers of officials or Councillors opens the way for corruption. There are sections of the Draft SDF Technical Report that are open to interpretation and, as a result, we do foresee future conflicts.	8. Other	Authors concern considered in the redraft of the CTSDf, Various policy statements have been amended to reduce ambiguity.
96.4	Simon Liell-Cock	Far South Peninsula Community Forum	The City has a Developer's Forum form which Civic society is excluded. This provides much speculation regarding a "Development bias" within the City. Does the City envisage forming a Civic Forum?	8. Other	The SDF has undergone an extensive public participation process and the opinions of all stakeholders have been considered. We believe that the process has been fair, consultative and transparent.
96.5	Simon Liell-Cock	Far South Peninsula Community Forum	What is the relationship of an Overlay Zone to the Cape Town Zoning Scheme (CTZS), and to the District Plan?	8. Other	An overlay zone is a component of the CTZS and thus affects property development rights. The District Plan guides spatial development and but does not directly affect property development rights.
96.6	Simon Liell-Cock	Far South Peninsula Community Forum	How does one get an Overlay Zone? In particular how can we ensure that an Overlay Zone is in place before the SDF is finalised?	8. Other	This is beyond the scope of the SDF. This comment to be referred to the Planning and Building Development Management department.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
96.7	Simon Liell-Cock	Far South Peninsula Community Forum	Which has priority - the CTZS or the Local SDP (see definition in the table on page 8)?	8. Other	The CTSDf and the District Plans provides a strategic vision for the future of the city, while the draft CTZS designates specific use zones (and associated built form parameters) to individual properties. The CTZS's overlay zoning category, whereby policy guidelines (such as those contained in the SDF) can be translated into development rules after following a prescribes process, is a link between the two documents.
96.8	Simon Liell-Cock	Far South Peninsula Community Forum	Which legislation governs what can happen in the Urban Edge Management Zone and the Coastal Edge Management Zone? SDF or CTZS?	8. Other	The CTSDf and the District Plans provides a strategic vision for the future of the city, while the draft CTZS designates specific use zones (and associated built form parameters) to individual properties. The CTZS's overlay zoning category, whereby policy guidelines (such as those contained in the SDF) can be translated into development rules after following a prescribes process, is a link between the two documents. This applies irrespective of its position in relation to the urban or coastal edge. The CTSDf provides a strategic vision for the future of the city, while the draft CTZS designates specific use zones (and associated built form parameters) to individual properties. The CTZS's overlay zoning category, whereby policy guidelines (such as those contained in the SDF) can be translated into development rules after following a prescribes process, is a link between the two documents.
98.1	Rod MacPhail	Vergenoegd Estate	Regarding the public hearing. A 10 minute time slot presentation considered insufficient for Property Developers forum who represent shared proposals. Improper public consultation.	8. Other	The City has complied with PG:WC's requirements regarding public participation. There were a number of opportunities for responses (via written and verbal) incorporated into the participation process.
100.1	Graham Noble	Scarborough Ratepayers & Ratepayers Association	CTSDf must be in place before a zoning scheme can be contemplated	8. Other	There has been a close working relationship between the drafters of the two documents and both these documents have been endorsed by the same political structure. A legal option obtained by Council in this regard advises that there is no legal impediment on drafting the CTZS and CTSDf in parallel or even approving the CTZS before the CTSDf.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
100.14	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Cape Town 2040 vision – sounds messy but has something quite close to a good mix of elements - Biggest omission is unique biodiversity and heritage resources	8. Other	Authors comment considered in redrafting of the CTSDf. Biodiversity and Heritage are key focus areas of the CTSDf - refer P25-P29 and P43 - P49. The City vision was adopted from a process currently underway to develop a City Development Strategy (CDS) - there will be an opportunity to revisit the City Vision when this process continues.
100.15	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Spatial development principles should come before goals	8. Other	Authors comment noted in consideration of redrafting of CTSDf.
100.16	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Only one goal is given, what happened to 'compact city' and other good goals in previous drafts;	8. Other	Compact City is not a goal in itself - what is important is that City is sustainable and equitable for all capetonians. Author referred to Policy P22 and P23.
100.17	Graham Noble	Scarborough Ratepayers & Ratepayers Association	The first four spatial development principles are worthy – the other six are good intentions, not principles;	8. Other	Authors comment taken into consideration in the redrafting of the CTSDf.
100.18	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Author considers key Strategies 4.4.1 and 4.4.2 excellent for IDP but not for CTSDf – CTSDf should explain how they determine spatial land use management and visa versa.	8. Other	The strategies are explained in greater detail, with accompanying policy guidelines to guide the evaluation of applications in Chapter 5 (see third column).
100.19	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Strategy 4.4.3 is easier to relate to land use management but needs to be spelled out in much more detail	8. Other	Author referred to Ch 5.2. The strategy is explained in greater detail, with accompanying policy guidelines to guide the evaluation of applications in Chapter 5 (see third column).
100.2	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Long Term Metropolitan Structure (Sections 5.1-5.5) is well constructed and presented	8. Other	This section has been further improved upon based on the comments received from the public.
100.2	Graham Noble	Scarborough Ratepayers & Ratepayers Association	CTSDf adopts a bland reassuring tone. Paragraphs are incomprehensible and chapters are meaningless and full of muddled thinking. City should consider totally restructuring and rethinking entire document.	8. Other	This comment is non-specific and thus difficult to respond to. Concerns raised have been noted.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
100.3	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Public participation has been inadequate. There was no serious attempt to gather public input.	8. Other	The public participation process has been extensive and has exceeded legal requirements both in terms of the MSA and LUPO. A more detailed report on this process followed is available on request - and has been submitted to the Provincial Government for review. The City has complied with PG:WC's requirements regarding public participation. There were a number of opportunities for responses (via written and verbal) incorporated into the participation process.
100.4	Graham Noble	Scarborough Ratepayers & Ratepayers Association	With regards the purpose of SDF: Uncertain vision of desired spatial form and structure of Cape Town, Goals, strategies and policies are unclear, This draft guides the SDP's, EMF's in a very general and fuzzy way;	8. Other	The CTSDf has been revised to give more clear direction. The CTSDf outlines the City's desired spatial form at a metro level, and provides strategies and policies to guide preparation of district plans, EMF's and the evaluation of applications.
100.5	Graham Noble	Scarborough Ratepayers & Ratepayers Association	Flexible policies and discretionary decision making strikes terror into hearts of concerned citizens concerned with preventing indiscriminate loss and degradation of critical biodiversity areas. Recent Mayco decision to support Uitkamp on 1st December 2010 breach the Urban Edge and override City policy, a forward planning document like the SDF – a product of public participation – something we would not like to see without due process and equally serious debate of the consequences. Policies and documents like the SDF need to be seen as contractual agreement between the City and its citizens – is the CTSDf likely to be similarly overridden when convenience requires it?	8. Other	The CTSDf when approved by the PGWC as a structure plan in terms of s4(6) of LUPO will become stronger in terms of guiding decision-making and development applications that deviate from the CTSDf will need to go through a structure plan amendment process. SDF's approved as structure plans in terms of s4(6) are the highest level of status afforded by planning legislation in the Western Cape.
101.1	Liz Brunette	Constantia Hills Residents Association	Should start with "By 2040 Cape Town will be one of the world's greatest cities..."	8. Other	Authors comment considered in redrafting of the CTSDf. The City vision was adopted from a process currently underway to develop a City Development Strategy (CDS) - there will be an opportunity to revisit the City Vision when this process continues.
101.14	Liz Brunette	Constantia Hills Residents Association	Gap housing - Housing for households ... that fall outside the government...	8. Other	The facilitation of housing is a responsibility of local government Gap housing is part subsidised.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
101.15	Liz Brunette	Constantia Hills Residents Association	Metropolitan open space system - should "detention ponds" be "retention ponds"?	8. Other	Authors comment considered in redrafting of CTSDF.
101.17	Liz Brunette	Constantia Hills Residents Association	Change "... it is impossible accurately to determine..." to "... it is impossible to accurately determine..."	8. Other	Authors comment considered in redrafting of CTSDF.
101.18	Liz Brunette	Constantia Hills Residents Association	Figure 1.1 - replace "By laws" with "bylaws"	8. Other	Authors comment considered in redrafting of CTSDF.
101.19	Liz Brunette	Constantia Hills Residents Association	CTZS box, page 8 - "... to enable Council proactively to manage land..." to "... to enable Council to proactively manage land..."	8. Other	Authors comment considered in redrafting of CTSDF.
101.2	Liz Brunette	Constantia Hills Residents Association	1st para, page 27; "... structuring elements, which have been developed ..."	8. Other	Authors comment considered in redrafting of CTSDF.
101.21	Liz Brunette	Constantia Hills Residents Association	5.1 resilience and adaptively - "... reduce its CO2 emissions..."	8. Other	Authors comment considered in redrafting of CTSDF.
101.22	Liz Brunette	Constantia Hills Residents Association	5.2 a city within a region - Suggest simplifying "... a sprawling conurbation..."	8. Other	Authors comment considered in redrafting of CTSDF.
101.24	Liz Brunette	Constantia Hills Residents Association	6.1.3 - Policy 13; replace "cyclor" with "cyclist"	8. Other	Authors comment considered in redrafting of CTSDF.
101.25	Liz Brunette	Constantia Hills Residents Association	Table 6.2 Principle 3. "... when determining the short to medium-term public transport routes"	8. Other	Authors comment considered in redrafting of CTSDF.
101.26	Liz Brunette	Constantia Hills Residents Association	Table 6.9 Replace "stormwater detention ponds" with "stormwater retention ponds"	8. Other	Authors comment considered in redrafting of CTSDF.
101.27	Liz Brunette	Constantia Hills Residents Association	6.3.5; P45.1 Remove "when making planning and development decisions that affect heritage resources" at the end of the first bullet point.	8. Other	Authors comment considered in redrafting of CTSDF.
101.28	Liz Brunette	Constantia Hills Residents Association	Appendix B - table 1 - Integrated Transport Plan - remove "To" at the start of bullet points under strategies 2 and 3.	8. Other	Authors comment considered in redrafting of CTSDF.
101.29	Liz Brunette	Constantia Hills Residents Association	Appendix B - Integrated Environmental Management Plan - "...and leads to unwanted social..." in the 2nd bullet under strategy 2	8. Other	Authors comment considered in redrafting of CTSDF.
101.3	Liz Brunette	Constantia Hills Residents Association	Appendix B - Disaster Risk Management Framework - "ensure effective and appropriate disaster response..." in the 1st bullet under strategies 1 and 2	8. Other	Authors comment considered in redrafting of CTSDF.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
101.31	Liz Brunette	Constantia Hills Residents Association	Appendix D: Strategic Impact Assessment (SIA) of the Cape Town Spatial Development Framework (CTSDF)	8. Other	Authors comment considered in redrafting of CTSDF.
102.2	Alan Jackson	Greater Lynfrae Civic Association	The failure of the City to request comment on updated District SDFs and Local SDFs means that we are not in the position of fully understanding or accepting the CTSDF.	8. Other	The district plans will, subject to the endorsement of the Planning and Environment Portfolio Committee, proceed through the third and final phase of public engagement, which should be initiated in March / April 2011.
102.2	Alan Jackson	Greater Lynfrae Civic Association	More effort must be put into developing and incorporating informal urban planning into a consolidated LUMS.	8. Other	Author referred to P21 in the CTSDF.
102.26	Alan Jackson	Greater Lynfrae Civic Association	We support P1, P3-4, P6-P8, P15, P26, P32-P33, P35, P38, P45, P41 - P43, P46, P49, P50 - P52 pending the general acceptance by Civil Society of District SDFs and local SDFs	8. Other	Support appreciated.
102.4	Alan Jackson	Greater Lynfrae Civic Association	We must find the space and time a way in which the City Officials, Politicians and Civil Society can begin to talk to one another in earnest about the future of the City, so that we can come to broad agreement about where we are headed. Failure to do so will continue to lead to misunderstandings, resistance to progressive change, the slowing of the important processes contained in the CTSDF. We also need to get buy-in of all major political parties in the Western Cape so that the programme will not be reinvented whenever there is a change in political leadership in the City	8. Other	Agreed. This is an underlying theme in the document.
103.1	Patrick Dowling	WESSA	The CTSDF is not detailed enough or integrated enough to become the basis for responsible decision making	8. Other	We believe that the level of detail contained in the CTSDF is appropriate for a metropolitan scale strategic spatial development framework. The CTSDF is supported by greater detail at district scale in the district plans and further local area and sectoral planning.
103.11	Patrick Dowling	WESSA	Recommend CTSDF introduce concept of Municipal Sustainable Use Framework (MSUF). The status of this initiative and its link to the zoning scheme should be clarified;	8. Other	Authors comment considered in redrafting of the CTSDF and passed on to the Planning and Building Development Management department for further deliberation.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
103.14	Patrick Dowling	WESSA	Reassurance required that the CTSDF has absorbed wetland components, study, and recommendation of the 2007 Ninham Shand report. The CTSDF does not cover SDF's and EMF's as comprehensively as the Ninham Shand 2007 report does nor emphasise the statutory, public participation and proactive elements of this planning tool;	8. Other	Author referred to Map 5.6 Aquatic network. The CTSDF is a strategic high level document. EMF's are included at a more detailed level of planning in the District Plans which will, subject to the endorsement of the Planning and Environment Portfolio Committee, proceed through the third and final phase of public engagement, which should be initiated in March / April 2011.
103.15	Patrick Dowling	WESSA	Due to capacity constraints, spatial information must be easily available, up to date and reliable to implement the CTSDF.	8. Other	Agreed.
103.18	Patrick Dowling	WESSA	Recommend that to comply with MSA, a review must be undertaken of the SDF and SDP's which are prepared for public comment to reflect on environmental and heritage impacts of these plans. The assessment should form the basis of such a review providing a framework for assessing compliance and identifying potential strategic issues and impacts before finalization of the CTSDF. This review should determine how the CTSDF responds to environmental and heritage impacts, opportunities and constraints. Strategic issues which were identified in the assessment require more attention and if not addressed may result in non compliance with the policy and guideline obligations of the City.	8. Other	A strategic assessment of the environmental impact of the SDF was initiated in 2007. The results of that assessment guided the further development of the SDF. The draft CTSDF now includes a number of relevant policies and guidelines to direct development towards appropriate places and forms, to avoid environmental sensitive areas and resources and to maximise sustainable development. Mapping of Environmental Impact Management Zones has been completed and these are addressed in more detail in the District SDPs and Environmental Management Frameworks. A summary of strategic impacts and possible indicators of the CTSDF is included in the CTSDF appendix's. Every effort has been taken to ensure that the SDF is compliant with all relevant legislation and policy. More specific information is required on what aspects are believed to be non-complaint.
103.2	Patrick Dowling	WESSA	How will CTSDF be implemented (costs / staffing)? Commitment to an implementation plan is required to alleviate residents concerns and justify infrastructural investment promises – this may not be possible with current draft of the CTSDF	8. Other	The approved CTSDF will be a Council policy as well as part of the City's IDP which all relevant officials and decision-makers will be obliged to use in their daily duties be it assessing development applications, preparing spatial plans, preparing investment projects etc.
103.22	Patrick Dowling	WESSA	Vision statement somewhat utopic – how to achieve statements lacking	8. Other	Note. This is covered in policy and implementation sections of the revised CTSDF.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
103.33	Patrick Dowling	WESEA	CTSDF and IZS must be aligned through LUMS	8. Other	The CTSDF provides a strategic vision for the future of the city, while the draft CTZS designates specific use zones (and associated built form parameters) to individual properties. The CTZS's overlay zoning category, whereby policy guidelines (such as those contained in the SDF) can be translated into development rules after following a prescribes process, is a link between the two documents.
103.34	Patrick Dowling	WESEA	If passed by Provincial Government, the CTSDF will replace other plans. The CTSDF does not cover local realities to the same extent and District Plans will not necessarily cover same areas or issues – detail of dated plans must be replaced before finalization of the framework	8. Other	Authors comment inaccurate. The CTSDF will only withdraw plans of a similar scale i.e. the Guide Plans - which are considered to be outdate having been approved in 1988. Local area planning frameworks of a higher level of detail will be reduced in status from section 4(6) in LUPO to section 4(10) in order to rationalise Cape Towns planning framework of inconsistent policies and staus - they will not be withdrawn at this stage. The District Plans and other local planning frameworks will in any event incorporate the positive and relevant sections of these plans.
103.4	Patrick Dowling	WESEA	Will the CTSDF have the integrity required by national and provincial legislation	8. Other	A thorough assessment of the legal and policy context was undertaken. See section 2.
103.5	Patrick Dowling	WESEA	CTSDF must come before IZS. Will the CTSDF be flexible enough to be able to accommodate the IZS rather than strictly shape its final form?	8. Other	The CTSDF provides a strategic vision for the future of the city rather than a "blue print" plan for future development. This implies a level of flexibility. Author advised that there has been a close working relationship between the drafters of the two documents and both these documents have been endorsed by the same political structure. A legal option obtained by Council in this regard advises that there is no legal impediment on drafting the CTZS and CTSDF in parallel or even approving the CTZS before the CTSDF.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
103.9	Patrick Dowling	WEESA	Not clear that CTSDf has considered, internalized or made explicit concerns from the Convention on Biodiversity regarding the protection of ecosystems, habitats and species, sustainable use of wetlands, rehabilitation of degraded ecosystems, and, an ecosystem approach	8. Other	The Biodiversity Network identifies the Critical Biodiversity Areas needed to be conserved, and restored where required, to meet national conservation targets as far as is currently possible and thus contribute to South Africa's commitment under the CBD. The Biodiversity Network includes areas selected to meet ecosystem, species and ecosystem function (e.g. connectivity) targets. The CTSDf text has been modified to make this more explicit." See section entitled: "APPROPRIATELY MANAGE URBAN DEVELOPMENT IMPACTS ON NATURAL RESOURCES AND CRITICAL BIODIVERSITY NETWORKS".
106.1	Yachita Reddy	Sustainable Energy Africa	Transport coordination and public transport, densification, urban edge, threatened coastal and other land w.r.t. climate change, agricultural protection, building efficiency are not dealt with fully – particularly implementation / coordination with transport plans / budgets.	8. Other	Authors comments are wide-ranging and non-specific. Author encouraged to read detail in policy statements chapter 5 and the implementation chapter 7. Comment has been considered and circulated to policy drafters.
111.1	Willie van der Westhuizen	Western Cape Property Development Forum	Requests an opportunity to respond to the 'answer' provided on his comments prior to the document being sent to PEPCO or Council for approval.	8. Other	The CTSDf has been through 3 phases of public participation complied with all the legislative requirements relating thereto. The CTSDf was submitted for provisional inspection on the 4th August 2010 in terms of Section 4(5) of the Land Use Planning Ordinance, 1985 (Ordinance 15 of 1985) by the Department of Environmental Affairs and Development Planning (DEADP). The official response from the DEADP indicated a general satisfaction with the content of the CTSDf and furthermore, that the process followed, as stipulated in the Section 4(1) approval letter, is deemed to be sufficient up to the Section 4(4) requirements of LUPO, which enables the City to progress to the next step of the approval process which is described in Section 4(5) of LUPO. It is on this authority that the final round of representations, responses to objections etc. has been set in motion.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
114.1	Willie van der Westhuizen	Western Cape Property Development Forum	Initial public participation process was lacking. Responses from the expert review committee were inadequate. This committee was biased. WC Property Development Forum was denied an opportunity to engage with the City. Omission of the preparation and public participation of a working document on the building blocks of an urban edge.	8. Other	The public participation process was extremely thorough and involved three phases. Problems in earlier phases were corrected in later phases. The review panel was appointed on basis of tender, which was fair and democratic, and the panel members were endorsed by Council and were selected for their neutrality and professionalism. It was important that the Review Panel remained objective and did not open itself to particular lobbies or be representative of particular lobbies as this would have undermined the open, fair and transparent public participation to date. The City is satisfied with the work of the Review Panel.
115.2	Ms S Strydom	Road Network Management	The interventions for the 3 Key Strategies have yet to be developed. The CTSDf consists of policies and intentions without clear guidance informing the intended growth and necessary interventions, such as bulk service requirements, location of the future spatial form, urban edge details, etc., as one would expect of a Structure Plan, supporting the sustainable growth of an established City over the next 20 years.	8. Other	Disagree with authors statement. The CTSDf provides a clear indication of growth boundaries (i.t.o. urban edges) as well as future growth areas of the City, both short, medium and long term (author referred to Map 5.3). The development potential of these areas (yield i.t.o. area and potential density) has been calculated and has informed the master plans of City's utility service dept's. Author must take cognisance of scale at which CTSDf is prepared (at metro level). However, in order to realise goals of CTSDf, acknowledged that budgets and plans betw. Dept's must be aligned. For this reason at 15 growth management plan is proposed (see Section 7.3). This work has already commenced to inform IDP budget alignment process.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
115.4	Ms S Strydom	Road Network Management	Section 2.2 – Most of the major road network within the City of Cape Town consists of roads proclaimed in terms of the Roads Ordinance, (as amended), as Trunk Roads, Main Roads, Divisional Roads and Minor Roads, and vests with the Provincial Government. Request that following legislation is included in the Spatial Development Framework: Road Ordinance, 1976, (Ordinance 19 of 1976, as amended; and Advertising on Roads and Ribbon Development Act, 1940, (Act 21 of 1940, as amended), which “regulates the display of advertisements outside certain urban areas at places visible from public roads and the depositing or leaving of disused machinery or refuse and erection, construction or laying of structures and other things near certain public roads and access to certain land from such roads”.	8. Other	Authors comment considered in redrafting of the CTSDf and discussed with City Transport officials and Transport Network Infrastructure Development (TNID) dept. This legislation is considered to be beyond scope of CTSDf which by its nature is a high level strategic document.
115.5	Ms S Strydom	Road Network Management	Concerned that the City of Cape Town’s Integrated Transport Plan and the draft CTSDf do not appear to be aligned and thus integrated planning was not provided for in this final draft document. This Branch suggests that providing for any “movement system that provides all Capetonians with convenient and affordable access to the city’s resources and amenities” should be addressed in the ITP under Section 5: Principles for preparing transport plans.	8. Other	The CTSDf was prepared in close consultation with City's transport department. The ITP is currently being reviewed and a comprehensive update will follow in 2012. This update will reflect alignment / consistency with the CTSDf.
125.04	Leona Bruiners	PGWC: Rural Development & Land Reform	Wayforward should have one year, five year and 30 year implementation plans with deliverables and actions.	8. Other	This comment has been considered. See implementation section in Ch 7.
125.04	Leona Bruiners	Rural Development and Land Reform	Wayforward should have one year, five year and 30 year implementation plans with deliverables and actions	8. Other	This comment has been considered. See section on implementation plan.
125.05	Leona Bruiners	PGWC: Rural Development & Land Reform	More detail requested on projects underway - Appendix G should be included and not slotted in appendix.	8. Other	Appendix G has been included in Chapter 7 in the revised CTSDf. The detail regarding the projects is listed under the relevant policy - see policy reference column.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
125.06	Leona Bruiners	PGWC: Rural Development & Land Reform	Revise definitions for civic precinct and coastal node	8. Other	Authors suggestion considered in redrafting of the CTSDf.
125.07	Leona Bruiners	PGWC: Rural Development & Land Reform	General recommendations to wording of policy statements in Ch 6.	8. Other	Authors suggestions considered in the redrafting of the CTSDf.
125.08	Leona Bruiners	PGWC: Rural Development & Land Reform	Propose merge of Ch 6 and 7	8. Other	Authors suggestion considered in redrafting of the CTSDf.
125.09	Leona Bruiners	PGWC: Rural Development & Land Reform	Label maps figures and diagrams with legends	8. Other	Maps, figures and diagrams have been labelled appropriately.
126.01	Mr M A R Khan	PGWC: Water Affairs	Legislative context needs to include water legislation	8. Other	The Water Acts referred to have been included into Appendix B: Table B.2 : Relevant National and Provincial legislation and policies.
133.03	Jane Meyer	Mouillepoint Ratepayers Association	The extent of BRT associated structures in the Mouille Point area should be kept to a minimum.	8. Other	This is beyond the scope of the SDF. This comment to be referred to District Planners / relevant department
170.01	Willie van der Westhuizen	Rod McPhail (Member of the WCPDF)	No proper consultation with interested and affected parties. The 10 minute long hearing afforded to the WCPDF on 28 Jan 2011 was insufficient. The WCPDF requires a considerably longer time to present its case than those presenting on a case-by-case basis.	8. Other	Extensive public consultation consisting of three phases has taken place. In addition the City has frequently engaged with the WCPDF and has considered extensive written comment from the WCPDF / WCPDF members.
Comment Theme: District Plans					
12.1	Maya Beukes	Kenilworth Racecourse Conservation Area	Want revised maps for Southern Area of City (District Plans ?)	9. District Plan	The district plans will be circulated for comment shortly. District level mapping will be included in the District Plans.
30.1	Mrs BJ vd Merwe	Cape Town Assoc for the Physically Disabled	Stormwater and fencing problems on erf 111403, Athlone	9. District Plan	Stormwater infrastructure risk is indicated on Map 3.1 and Map 7.3.
36	Mr Dyonase	New Crossroads Residents Association	Concerned about conditions in New Cross Roads eg no Police Station, clinic, library, shopping centre, old age home, no jobs, sports facilities, inadequate housing and cleaning.	9. District Plan	Author referred to Map 7.1. and CSIR study: Evaluation of community social facilities and recreational space in City of Cape Town: current and future provision for 2016 and optimal location of new facilities Comment referred to District Plans (2010).

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
37.2	Alan Dolby	Constantia Property Owners' Association	Summarizes important points from a meeting with the District Planner on 23rd March 2010 eg status of existing planning policy in the area, need to protect 'uniqueness' of area, to prevent inappropriate densification and not to permit commercial intrusion.	9. District Plan	The CTSDf and District plans are intended to rationalise the outdated and inconsistent planning framework which is currently in place. Whilst there are specific policies which address the authors concerns in the CTSDf, the authors comment appears to be generally District specific and is therefore referred to the District Plans which are a more appropriate forum for authors comment.
55.1	Ms HMJ du Preez	Dept Cultural Affairs & Sport	Suggested that CoCT identify suitable initiation sites eg Cape Flats and Khayelitsha / Mitchells Plain District Plans.	9. District Plan	The CTSDf is a strategic high level document which establishes a vision for the metropolitan area, introduces spatial building blocks, and policies to achieve vision/goals. Comment referred to District Plans.
55.2	Ms HMJ du Preez	Dept Cultural Affairs & Sport	Specific comments on Table Bay and Southern Peninsula District Plans. World Heritage sites are not shown correctly on District Plans. Also there is very little reference to geological, paleontological and archaeological heritage. Need to show Provincial and Local Heritage Sites on District Plans.	9. District Plan	Authors comment considered - World heritage sites are shown on revised map 5.8. The City has prepared a heritage resources inventory for the city area, as required by the NHRA when preparing the SDF. Comment referred to District Plans for finer scale planning.
55.9	Ms HMJ du Preez	Dept Cultural Affairs & Sport	More in-depth planning and reference should be given to culture and sport infrastructure in the District Plans.	9. District Plan	The City's cultural landscapes are indicated on revised map 5.7. The CTSDf has been prepared for approval in terms of the Land Use Planning Ordinance (No 15. of 1985), and is therefore concerned primarily with spatial planning. Author referred to Map 5.7 (cultural landscapes) and 7.1 (facilities needed to address priority backlog. District plans will depict the spatial elements at a district level.
83.01	Lisa van Aarde	Planning Partners	Submitted on behalf of owners of erf 52676 Khayelitsha. Previously submitted comments (2009) are referred to. These deal with how various aspects of the SDF potential impact on the planning for erf 52676 Khayelitsha (Swartklip site). As it is recognised that the SDF is "broad brush" these comments are submitted again in order to inform other plans (including District Plans). But will wait on advertisement District Plan public participation process.	9. District Plan	Authors comment received and referred to District Plans.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
84.04	George Sieraha	Durbanville Community Forum	Durbanville CBD Urban Design Framework should be adhered and Durbanville residential areas must be protected by an overlay [zone].	9. District Plan	Comment referred to the District Plans which have taken relevant local level policies into consideration. Overlay zones are beyond the scope of the CTSDf.
93.1	Rory Sales	Noordhoek Conservancy	The CTSDf fails to recognize the far south as a separate planning entity, which it should be due to its importance as a recreational, lifestyle and tourist destination. The Far South should have its own 'overlay' within the CTSDf.	9. District Plan	Overlay zones are beyond the scope of the CTSDf.
93.13	Rory Sales	Noordhoek Conservancy	We believe that P33 should be applied to the Noordhoek Conservancy as it is already a mix of urban and agricultural settlement	9. District Plan	The intention of the CTSDf policy statements is that they are used for this type of purpose. Authors comment circulated to relevant district planner which is a more appropriate forum to consider authors suggestion.
93.4	Rory Sales	Noordhoek Conservancy	The author provides a comprehensive description of the Noordhoek 'experience' i.t.o. its amenity value, tourism value, zoning breakdown, nature areas, wetlands, historic routes (Noordhoek main road cited) and structures and agricultural land uses. The author asserts that any changes in land use must be considered within this context. The author highlights that changes in sub-divisional size and zoning (or land use) will negatively affect the Noordhoek 'experience' and the economic benefits of Noordhoek.	9. District Plan	The CTSDf is a strategic high level document which establishes a vision for the metropolitan area, introduces spatial building blocks, and policies to achieve vision/goals. The authors comment is beyond the scope of the CTSDf. Authors concerns circulated to relevant district planner.
93.6	Rory Sales	Noordhoek Conservancy	The author cites a number of diverse economic small business activities which take place in Noordhoek in response to the perceived rural ambiance offered by Noordhoek. The CTSDf must acknowledge these activities. The importance of land size over 4000 sq.m is emphasized in the promotion of these enterprises.	9. District Plan	The CTSDf is a strategic high level document which establishes a vision for the metropolitan area, introduces spatial building blocks, and policies to achieve vision/goals. The authors comment is beyond the scope of the CTSDf. Authors concerns circulated to relevant district planner.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
93.7	Rory Sales	Noordhoek Conservancy	The author highlights a need for pre-and primary schooling in Noordhoek on a suitable site which will not negatively impact on surrounding uses. City owned land on Cape Farm 933 which is currently partially used as a sports facility is recommended as a school facility due to its linkage with transport routes.	9. District Plan	The CTSDf is a strategic high level document which establishes a vision for the metropolitan area, introduces spatial building blocks, and policies to achieve vision/goals. The authors comment is beyond the scope of the CTSDf. Authors concerns circulated to relevant district planner.
93.8	Rory Sales	Noordhoek Conservancy	There is a need for the City to provide safe NMT links in Noordhoek to add to the tourist / visitor experience and hence to support economic growth (refer attached proposed bridle and cycle paths (map included).	9. District Plan	The CTSDf supports the provision of NMT links (refer P13). Authors comment circulated to relevant district planner and transport department.
93.9	Rory Sales	Noordhoek Conservancy	There is a lack of enforcement of alien vegetation eradication in Noordhoek on privately owned land and land owned by TMNP which requires redress.	9. District Plan	The CTSDf is a strategic high level document which establishes a vision for the metropolitan area, introduces spatial building blocks, and policies to achieve vision/goals. The authors comment is beyond the scope of the CTSDf. Authors concerns circulated to Environmental Resource Management dept. and relevant district planner.
94.1	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Environmental Significance – Request a review in respect of Sir Lowry's Pass Village and surrounds taking into account the Community Tourism Project and other related initiatives;	9. District Plan	The CTSDf is a strategic high level document which establishes a vision for the metropolitan area, introduces spatial building blocks, and policies to achieve vision/goals. The authors comment is beyond the scope of the CTSDf. Comment referred to the District Spatial Development Plans (DSDP's) which are a more appropriate forum for authors recommended review.
94.11	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Economic Significance - Request a review in respect of Sir Lowry's Pass Village and surrounds taking into account the Community Tourism Project and other related initiatives;	9. District Plan	The CTSDf is a strategic high level document which establishes a vision for the metropolitan area, introduces spatial building blocks, and policies to achieve vision/goals. The authors comment is beyond the scope of the CTSDf. Comment referred to the District Spatial Development Plans (DSDP's) which are a more appropriate forum for authors recommended review.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
94.12	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Relocation and Realignment of Access Road to Sir Lowry's Pass Village – Previous representations of community groups were advised to await construction of the N2. There is substantial community support for relocation of the access road to the Sir Lowry Pass Village and realignment of Div Roads 1006 and Naauwland Road	9. District Plan	Comment referred to the District Spatial Development Plans (DSDP's) and transport department.
94.18	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	The Schapenberg Sir Lowry's Conservancy traversing Schapenberg hills to the foot of the Hottentots Holland Mts. Together with the unique character of the village complement each other and thus create a unique tourism destination within the City at its eastern gateway	9. District Plan	Gateways' have been introduced on Map 5.8. Comment referred to District Plans for interrogation at local / district level of planning.
94.19	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Insufficient attention has been given to the development of sustainable economic opportunities in the preparation of a Holistic Plan for the area with its inhabitants. The author acknowledges that this process is ideally suited to the District Plan but insists this will be meaningless if the CTSDf does not take cognizance of these and reduces the opportunities in the interim. A consultative planning process is requested with the individual communities of Cape Town to develop a holistic plan is requested.	9. District Plan	The CTSDf is a strategic high level document which establishes a vision for the metropolitan area, introduces spatial building blocks, and policies to achieve vision/goals. The authors comment is beyond the scope of the CTSDf. Comment referred to the District Spatial Development Plans (DSDP's) which are a more appropriate forum to consider authors proposals.
94.9	Barbara Court	Sir Lowry's Pass Tourism & Business Development Trust	Land Use Significance – Request a review in respect of Sir Lowry's Pass Village and surrounds taking into account the Community Tourism Project and other related initiatives;	9. District Plan	The CTSDf is a strategic high level document which establishes a vision for the metropolitan area, introduces spatial building blocks, and policies to achieve vision/goals. The authors comment is beyond the scope of the CTSDf. Comment referred to the District Spatial Development Plans (DSDP's) which are a more appropriate forum to consider authors proposals.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
96.27	Simon Liell-Cock	Far South Peninsula Community Forum	The City continued to approve rezoning of smallholdings in the vicinity of the wetlands adjacent to Kommetjie Road from Agriculture to Service Industrial sites. Such zoning was and still is inconsistent with the Peninsula Urban Structure Plan, 1988. Ironically, even the degradation of the Wetlands is now being used to motivate for development on Kommetjie Road. The City has made no attempt to control development in the Noordhoek Wetland Catchment area, nor have they enforced conditions of approval.	9. District Plan	The Peninsula Guide Plan (1988) states under paragraph 4.2 (d) that 'service industries that normally form an integral part of a central business area can be allowed in suitable areas that have not been allocated for industrial purposes...provided that the necessary approval is obtained and the sites concerned have been appropriately zoned'. Refer definition for urban development in CTSDF Ch 6. which reflects this sentiment. Tthe CTSDF supports land use intensification along public transport routes subject to context (refer Policy 22). Kommetjie Road is designated as a development routes. Development routes are characterised by nodal type development at key intersections - mixed-use development is already occurring at the identified nodes (Long Beach, Masiphumelele, & Ocean View) - the district plan provides more detailed sub-area management guidelines which are intended to restrict internodal areas to residential use and restrict industrial development to light industrial related activities in the designated industrial areas, whilst bona fide, low impact, working from home practices are strongly encouraged, with larger scale businesses operating within and being directed towards the Fish Hoek and Sun Valley nodes. Authors concerns circulated to relevant district planner.
105.4	Patrick Dowling	Kommetjie Residents & Ratepayers Association	The SEA document produced by consultants highlight District D (Southern District) as ecologically sensitive – and not considered a priority for EMF due to limited publicly owned land identified for development – we support this and propose that specific attention be given to Southern District to include pieces of land with have high ecological significance (either publicly or privately owned)	9. District Plan	The CTSDF is a strategic high level document which identifies, on a metropolitan level, Core 1, Core 2, Buffer 1 and Buffer 2 areas (refer Ch 6 for land use descriptions of these Spatial Planning Categories). Authors concerns circulated to relevant district planner.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
176.01	Sandy Sharpe	Barbarossa Residents Group	Concerned that the Constantia Triangle Local Structure Plan has been omitted and request that it and its tenets be included. Concerned that District Plan shows this triangle as a commercial centre and that some limited mixed use and densification development is proposed.	9. District Plan	Plan referred to is at a local scale and beyond the scope of the CTSDf which is a strategic plan for the entire metropolitan area.
176.02	Sandy Sharpe	Barbarossa Residents Group	Requests that the names of non existent plans be removed from the SDP (District Plan) eg 'Constantia Triangle Management Study' and ' Constantia Village Precinct Plan'. The correct title is Constantia Triangle Local Structure Plan.	9. District Plan	Referred to District Plan
176.03	Sandy Sharpe	Barbarossa Residents Group	Requests that the scenic drives of the Constantia - Tokai Valley be all included on maps etc.	9. District Plan	Referred to District Plan. The scenic routes shown on the CTSDf have been taken from the Scenic Drives Network - Vol 1 - Study Report (1998). S 2 Scenic Routes shown include Constantia Main Road, Steenberg and Spaanchemat River Roads.
176.04	Sandy Sharpe	Barbarossa Residents Group	Objection to recommendations of unsuitable and inconsistent densification in Constantia. No reference to existing minimum erf sizes in this area. Proposals for the waste site are unacceptable. Densification will denude the green canopy of Constantia which is part of a valuable cultural heritage.	9. District Plan	Site specific comments referred to District Plan. CTSDf densification policies refer to the need to adhere to district and local plan frameworks when assessing densification development applications. A 'one size fits all' approach will not guide density decisions.
176.05	Sandy Sharpe	Barbarossa Residents Group	Request that references to enlarging / intensifying Constantia Village centre be removed. Development should be concentrated around the Main Road corridor.	9. District Plan	Referred to District Plan. In the CTSDf the sub metropolitan nodes (i.e. areas for further land use intensification) for the Southern District are shown along Main Road and not in Constantia itself.
176.06	Sandy Sharpe	Barbarossa Residents Group	The intention to repeal local plans and replace them with the District Plans be abandoned.	9. District Plan	It is intended that the CTSDf will replace the Urban Structure Plans (former Guide Plans). The CTSDf, as an overarching plan, is to be approved in terms of section 4 (6) of LUPO and that former 4(6) structure plans relating to a local areas only will be reapproved as section 4 (10) plans. The intention is to achieve a hierarchy of plans for the city.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
176.07	Sandy Sharpe	Barbarossa Residents Group	Need to review and update the Constantia- Tokai Growth Management and Development Plan and the structure plan of 2002. Special attention should be paid to the preparation of overlay zones for the CT IZS.	9. District Plan	Referred to District Plan.
176.08	Sandy Sharpe	Barbarossa Residents Group	A more innovative approach to social inclusion, in a manner more compatible with the rural and arcadian quality of the valley should be adopted.	9. District Plan	Referred to District Plan.
99.10	Rory Sales	Noordhoek Conservancy	Use of the local aquifer in Noordhoek should be encouraged. Recommend undertaking a pilot study to see if a small scale potable water plant could be built to supplement water supply in Far South.	9. District Plan	The authors comment is beyond the scope of the CT SDF. Authors comment circulated to Environmental Resource Management dept, relevant district planner, and Water Services dept.
	Nosipho Singiswa	Ekasi Recruits	Comments focusing on Gugulethu. Need facilities to be maintained, rivers to be cleaned, streets to be upgraded and proper service delivery.	9. District Plan	The CT SDF is a strategic high level document which establishes a vision for the metropolitan area, introduces spatial building blocks, and policies to achieve vision/goals. The authors comment is beyond the scope of the CT SDF. Comment referred to the District Spatial Development Plans (DSDP's) which are a more appropriate forum for authors comment.
	Mrs Lorainne Fowler		How will the SDF affect Voortrekker and other roads in Parow ?	9. District Plan	Voortrekker Road is designated as a metropolitan development corridor, and largely reflects the nature of a mature activity route already. It is not anticipated to change dramatically in character, but the CT SDF does prioritise upgrading - refer policy 15. Refer map 5.1 for other route designations as well as section 6.1.4.
	Bruno Brincat		Proposal to establish a Oude Molen Eco - village (on Valkenberg Hospital site)	9. District Plan	The CT SDF is a strategic high level document which establishes a vision for the metropolitan area, introduces spatial building blocks, and policies to achieve vision/goals. The authors comment is beyond the scope of the CT SDF. Comment referred to the District Spatial Development Plans (DSDP's) which are a more appropriate forum for authors suggestion.
	Otto Gerntholtz	Intellectual Property Lawyers	What are the future plans for property along Otto du Plessis Drive, Milnerton ?	9. District Plan	Author referred to Map 6.1. The District plans will provided greater detail.

Comment Theme: Composite Plan

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
3.1	Paul Satz	Planning Partners	Difference between current and previous versions of composite plan? Can only see difference in node identification	10. Composite Plan	Urban edge revisions, inclusion of functional region and surrounding town planning / growth, coastal edges, nodal demarcations are all recent revisions to composite concept plan.
6.2	Prof Susan Parnell	Dept Env & Geogr Sciences, UCT	Need to indicate economic activity in Hout Bay. Surprised that neither Fishhoek or Hout Bay are shown as sub metro nodes	10. Composite Plan	A hierarchy of nodes is proposed including Metro, Sub-Metro, District and Local - this description is included in revisions to Ch 4.5. The district plans show District and Local level nodes.
6.3	Prof Susan Parnell	Dept Env & Geogr Sciences, UCT	Confusion regarding Hout Bay SDF transport routes, destination places, economic connectivity. There appears to be a desire to keep the valley distinct from the wider city but the SDF fails to create a coherent spatial focus for it as a destination/ economic hub.	10. Composite Plan	The CTSDf is a strategic high level document. District plans and Local level planning frameworks are a more appropriate forum to incorporate the authors suggestion. The draft district plans do include a specific focus on Hout Bay (refer Southern District plan)
96.22	Simon Liell-Cock	Far South Peninsula Community Forum	The Peninsula Urban Structure Plan (PUSP) designates Kommetjie Road as "urban development". However the following is stated in the PUSP:- "The term 'urban development' excludes land for industrial purposes, but includes all land uses that are normally directly related to and form an integral part of the urban residential component, including the Central Business Area and other business areas. This includes, amongst others, commercial and office functions, educational, medical and other institutions, parks, local open spaces and local recreational areas" (our emphasis) (Part 1 section 4.1 footnote).	10. Composite Plan	The Peninsula Guide Plan (1988) states under paragraph 4.2 (d) that 'service industries that normally form an integral part of a central business area can be allowed in suitable areas that have not been allocated for industrial purposes...provided that the necessary approval is obtained and the sites concerned have been appropriately zoned'. Refer definition for urban development in CTSDf Ch 6. which reflects this sentiment. Note that the description of Activity Routes and Development Routes has been revised to align with this definition see Ch 4.4. and Ch 6.
119.2	Gerhard Swart		Queries wording in legend of Map 7.1. eg 'urban edge recommendations' and SPC's. Words eg SPC's and risk industry are not explained in the text.	10. Composite Plan	Authors comment addressed in revised document - see Ch6, definitions and abbreviations.
Comment Theme: Mapping					
6.11	Prof Susan Parnell	Dept Env & Geogr Sciences, UCT	Housing issues: Map 8.3 notations are not clear; Need to change the legend to reflect the focus on public housing delivery.	11. Mapping	Map 8.3 (now 7.3) has been revised to indicate targetted housing sites more clearly.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
58.3	David Bettesworth	David Bettesworth T&R Planners	Map 6.6 - Urban Edge line needs to be shifted to accommodate the east west link road off Niel Hare Road and detailed corrections in the Atlantis, Mamre and Cape Farm 30 and 31 areas.	11. Mapping	Refer to resolutions from Urban Edge Task Team 22/01/2011.
58.4	David Bettesworth	David Bettesworth T&R Planners	Map 8.2 Suggested that an IRT route be planned along Blombosch Road to benefit the people of Witsand.	11. Mapping	The precise route alignment of the IRT is beyond the scope of the CT SDF. Comment referred to the IRT department.
58.5	David Bettesworth	David Bettesworth T&R Planners	Map 7.1 - Noxious industrial component of Atlantis Industria is nor shown as a risk industry area.	11. Mapping	Authors comment noted - map has been revised - refer map 6.1.
58.6	David Bettesworth	David Bettesworth T&R Planners	Map 7.1 - need to show proposed Atlantis activity corridor along Blombosch Road and also Parklands Growth Corridor in full.	11. Mapping	Blombosch Road is not considered a metro significant route, but is identified as a District Structuring Route in the District Plans. This comment has been passed on to the DSDP's for further consideration at a local level. Re: parklands growth corridor, Map 7.1. (now Map 6.1) indicates areas suitable for urban development within short-medium term inside the urban edge growth boundary.
70.4			Map 3.2 - 'Spatial Implications' is particularly weak. The intent of many plans appears to be quite conceptual but are drawn on a cadastral base. Map 3.1 is particularly poor.	11. Mapping	Both maps 3.1 and 3.2. have been revised.
76.05	Ms S.A Sharpe	Barbarossa Residents Group	Map: 3.2 No key for dotted lines	11. Mapping	Dotted lines represent the City's railway network.
76.12	Ms S.A Sharpe	Barbarossa Residents Group	Mapping: 8.1: Stadium in Noordhoek/Silvermine Mapping: References to map 8.2 on page77 correct? Perhaps 8.3 Mapping: 8.1: Stadium in Noordhoek/Silvermine Mapping: References to map 8.2 on page77 correct? Perhaps 8.3 Mapping: 8.1: Stadium in Noordhoek/Silvermine Mapping: References to map 8.2 on page77 correct? Perhaps 8.3 Mapping: 8.1: Stadium in Noordhoek/Silvermine Mapping: References to map 8.2 on page77 correct? Perhaps 8.3	11. Mapping	Maps have been revised and corrected. Note that the CSIR study which informed the facility shortfall analysis was based on a mathematical computer model - this mapping has since been revised and corrected on the CT SDF maps.

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77.03	Marco Geretto & Masilonyane Mokhele	NM Associates Planners & Designers	Map inconsistency: BPSP1 (core 1) NE of CTIA and N of N2 in fig 7.1 but in Tygerberg District Plan it is new gen industrial	11. Mapping	Authors comment passed onto District Plan.
105.3	Patrick Dowling	Kommetjie Residents & Ratepayers Association	Biodiversity map does not seem to include regionally significant Noordhoek wetlands – ownership should not exclude wetlands from consideration in a City plan.	11. Mapping	Author of comment directed to Map 5.6 which shows the City's aquatic network.
105.5	Patrick Dowling	Kommetjie Residents & Ratepayers Association	The SEA document states that information gathered from DSDP process suggest that views expressed by district planners are merely perceptions of the City's GIS system – the base layer information has not been systematically verified with the relevant departments – comments are aimed at source data and not necc. GIS capturing or rendering of information.	11. Mapping	Authors comment is purely speculative. The layers are not 'static'. District planners are aware of the land uses in their district and base layers are continually updated based on new information / analysis / field surveys / reports.
113.2	Lionel Hartle		Maps appear static in most cases eg should indicate development / investment over time eg roll out of integrated public transport system.	11. Mapping	Map 7.2 indicates phasing for IRT roll out. The CTSDf will be subject to review - refer section 7.3
113.3	Lionel Hartle		Map 6.6 suggests that a distinction between investment in economic vs social infrastructure is made.	11. Mapping	Map 6.6 (now 5.6) has been revised to indicate areas of future growth. At a metropolitan scale, required infrastructure investment is shown on map 3.1 and social investment is shown on map 7.1.
117.5	Sydney Holden	Sydney Holden Town Planners/Property Consultants	Need to avoid the depiction of detail at the SDF level. Should be drawn very schematically, eg the urban edge excluding certain farms or areas. .	11. Mapping	Maps are prepared at a metropolitan scale but based on a GIS based system in order to accurately define urban edge and other land use proposals. The composite plan (Map 6.1) includes 'conceptual designations' which are schematic / conceptual in nature.
	Mr JE Le Grange	Dept of Correctional Services	Satisfied with indication on page 75 for the proposed area for a Correctional Centre in the future.	11. Mapping	Authors comment noted - this item will be carried forward in the District plans.
Comment Theme: Legal					
35.1	Dr Koos Jonker		Commends public participation process. Development Facilitation Act is applicable throughout the country.	12. Legal	Noted. Only chapter 1 of the Development Facilitation Act is applicable to the Western Cape - this is reflected in revised CTSDf - see Ch 2.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
50.12	Andy Miles	Property Developers Forum	The proposed SDF fails the NEMA test. Specifically, the economic informants are inadequate. The plan fails the sustainability test being a balance between NEMA's 3 fundamental criteria for evaluating development proposals. The only dimension that has been fully evaluated is the green environment.	12. Legal	NEMA provides principles for decision-making on matters affecting the environment. These are addressed in the CTSDf with specific application to the spatial form and location of development and its impact on the environment. The CTSDf has been prepared in terms of the Land Use Planning Ordinance (No 15 of 1985) and Municipal Systems Act (No 32 of 2000). Further detail on other aspects to be considered can be found in other informants, such as the Economic Development Strategy (refer Appendix B).
50.3	Andy Miles	Property Developers Forum	Preferable that the SDF is a guiding document subject to further planning as opposed to a legal document. Legal status of the proposed SDF and District Plans seems to be more than capable of being challenged.	12. Legal	The approved CTSDf and District Plans will not be law and will not give or take away rights but will be policies that guide decisions on the change of land use rights in line with a strategic vision for the future of the city. The intention of having policies is to bring predictability, transparency and consistency to planning and decision-making in Cape Town from the perspective of the public and in line with public input on the future of Cape Town. The CTSDf will continue to be reinforced by further local area and sectoral planning.
55.1	Ms HMJ du Preez	Dept Cultural Affairs & Sport	Legal requirement ito National Heritage Resources Act 1999(Act 25 of 1999) for identification of heritage resources and heritage areas when spatial development plans are developed. No evidence of this in the CTSDf.	12. Legal	The City's heritage inventory is to be submitted to the relevant heritage resources agency as required by the NHRA. This has been referred to in Policy Statement 43 : Identify, conserve and manage heritage resources including cultural landscapes..
55.3	Ms HMJ du Preez	Dept Cultural Affairs & Sport	Need a cross reference to the National Heritage Resources Act, 1999	12. Legal	Policy Statements 28, 43, 44, 45 46 and 47 cross reference to the NHRA.
55.6	Ms HMJ du Preez	Dept Cultural Affairs & Sport	Existing heritage resource inventories need to comply with section 7 of the National Heritage Resources Act, 1999.	12. Legal	Existing inventories that have not yet been brought into compliance with the grading system (as set out in section 7 of the NHRA) and will be regraded by the City as suggested by author.
56.2	Shaun Schneier		Questions whether the envisaged Coastal Protection Zone Bylaw is intended to give effect to the Integrated Coastal Management Act (No 24 of 2008) ? If not then suggests wording inclusions for Policy 21.	12. Legal	The coastal protection zone does give effect to the ICMA and in fact goes further than is required by the Act and proposes greater protection of the City's coastline.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
57.2	Mike Slayen	Table Mountain National Park	1988 Guide Plan for Peninsula provided protection for the designated 'Nature Area'(section 4.3 of guide plan) . Such protection needs to be carried through to the CT SDF.	12. Legal	The nature areas have been designated as buffer or core spatial planning categories in the CT SDF. This SDF is to be approved as a 4 (6) structure plan in terms of LUPO. This level of structure plan is the highest level of planning status provided for by LUPO, which is the planning ordinance regulating development and matters incidental thereto in the Western Province.
61.5	Frank Wygold	Cape Environmental Trust (CAPTRUST)	No prospecting or mining should be allowed in any part of the greater Cape Town without an EIA.	12. Legal	Authors concern noted. This is a legislative issue beyond the scope of the CT SDF.
65.4	Joy McCarthy	Table View Ratepayers Assoc	Planning processes are not consonant with the latest 'green' building practices. This needs to change especially in Table View.	12. Legal	Policy statements refer to the need for compliance with, for instance, the draft Green Building Guidelines. Specific areas are not identified in the CT SDF which is a metro level document - referred to District Plans.
68.1	Oliver Dods	Hout Bay & Llandudno Heritage Trust	Believe that district level plans and local overlay zones should have been completed first to ensure that no local issues could be later compromised by the prior approval of the SDF. Refers specifically to Policies 18 to 21.	12. Legal	The purpose of the CT SDF is to provide strategic vision for the desired spatial form of the city, and to guide the proposals contained in the more detailed district plans which cover a shorter time frame than the CT SDF. Key strategic informants such as the biodiversity network require up front analysis at metropolitan level. Further, there is no legal impediment to sequence of preparation.
68.4	Oliver Dods	Hout Bay & Llandudno Heritage Trust	The long overdue heritage register must be completed by the city as a priority.	12. Legal	A heritage inventory has been prepared by the City for submission to the relevant heritage resources agency. This inventory is in the process of continually being updated.
70.1	Mlamleli Pukwana		Questions alignment and consistency with other plans eg no indication of how the PSDF informs the CT SDF. Need more information regarding main features of district plans. Need to state exact nature and role of each tier of planning. Omission of a Public Infrastructure Investment Framework.	12. Legal	The draft CT SDF was submitted to the Provincial Government: Western Cape for provisional inspection and the PG:WC confirmed alignment at that stage with the PGWC. This will be a further consideration of the PG:WC in the approval process.
73.7	Kim Kruishaar	Independent Environmental consultant living in the Far South Peninsula	The CoCT is operating in a credibility gap with respect to applying the precautionary principle to development on the urban edge, on agricultural land and in environmentally sensitive areas.	12. Legal	The CT SDF contains various policies and strategies for the urban edge, protection of agriculture and avoidance of environmentally sensitive areas. The comment provides no specific examples or locations of concern, but is nevertheless noted.

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Ref No	Contact	Organisation	Comment Summary	Theme	City of Cape Town Response
76.02	Ms S.A Sharpe	Barbarossa Residents Group	<p>Concern re ineffective enforcement of guidelines / policy</p> <p>Legal: Concern re sequencing of SDF and Zoning scheme (section 1.2)</p> <p>Legal: (GCTCA advised) Concern re inappropriate development before zoning overlays approved</p> <p>Legal: (GCTCA advised) SEIA should be done before SDF and DPs</p> <p>Concern re ineffective enforcement of guidelines / policy</p> <p>Legal: Concern re sequencing of SDF and Zoning scheme (section 1.2)</p> <p>Legal: (GCTCA advised) Concern re inappropriate development before zoning overlays approved</p> <p>Legal: (GCTCA advised) SEIA should be done before SDF and DPs</p>	12. Legal	The CTSDf is to be approved in terms of the MSA as a component of the IDP and in terms of LUPO as a 4 (6) structure plan - which is the highest level of planning status. The CTSDf provides a strategic vision for the future of the city, while the draft CTZS designates specific use zones (and associated built form parameters) to individual properties. The CTZS's overlay zoning category, whereby policy guidelines (such as those contained in the SDF) can be translated into development rules after following a prescribed process, is a link between the two documents. Author to note that there is no legal impediment to sequence of preparation. With regards the assessment of strategic impacts, this assessment was undertaken and is included in the CTSDf in appendix D.
76.03	Ms S.A Sharpe	Barbarossa Residents Group	Local Plans: Constantia Triangle Local Structure Plan 2003 omitted (table 1.2 p8)	12. Legal	The plan referred to is beyond the scope of the CTSDf and detailed planning will be informed by local area plans at a district level.
80.07	Mr John Wilmot	Durbanville Heritage Society	Legal: Concern re replacing local plans with SDF	12. Legal	Approved local plans that are approved in terms of section 4(6) of LUPO as detailed in Appendix A will be downgraded to section 4(10) status in terms of LUPO. The CTSDf will not replace local plans.
84.01	George Sieraha	Durbanville Community Forum	Legal: Concerns about the diversion of local issues to district level (as outlined by GCTCA; quote provided)	12. Legal	The purpose of the CTSDf is to provide strategic vision for the desired spatial form of the city, and to guide the proposals contained in the more detailed district plans. Diversion of local issues to the district level allows for specific and detailed, smaller scale, contextual analysis, within the framework of the strategic vision.

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85.09	Rod Gurzynski	Kommetjie Residents & Ratepayers Association	Legislation: App A: List of plans to be withdrawn: Why no mention of South Peninsula Sub-Regional Plan and South Peninsula SDF?	12. Legal	While both of these were prepared as 4(6) plans ito LUPO, and both got 4(5) approval (re- advertising process etc) neither was adopted as Council policy and officially submitted (as Council endorsed products) for final approval by PGWC. Neither, therefore, currently sit at PGWC officially awaiting 4(6) approval (unlike others listed as such in the SDF appendix A).
86.01	Geoff Neden	Far South Peninsula Community Forum	Legal: Concern re sequencing: how can we give input into CTZS before seeing SDF and SDP? It is understood that the draft SDF provides guidelines for the CTZS. Legal: Concern re sequencing: how can we give input into CTZS before seeing SDF and SDP? It is understood that the draft SDF provides guidelines for the CTZS.	12. Legal	The CTSDf provides a strategic vision for the future of the city, while the draft CTZS designates specific use zones (and associated built form parameters) to individual properties. The CTZS's overlay zoning category, whereby policy guidelines (such as those contained in the SDF) can be translated into development rules after following a prescribes process, is a link between the two documents. Author to note that there is no legal impediment to sequence of preparation.
86.02	Geoff Neden	Far South Peninsula Community Forum	Lack of clarity on which has priority/roles of CTZS & SDP? (definitions on pg8)	12. Legal	Author referred to box on page 4 which provides clarity. Author to note that the CTSDf provides a strategic vision for the future of the city, while the draft CTZS designates specific use zones (and associated built form parameters) to individual properties. The CTZS's overlay zoning category, whereby policy guidelines (such as those contained in the SDF) can be translated into development rules after following a prescribes process, is a link between the two documents. Author to note that there is no legal impediment to sequence of preparation.

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86.12	Geoff Neden	Far South Peninsula Community Forum	Legal: SEA not subjected to a PPP. Concerns noted regarding lack of input into SDP and GIS information on which based.	12. Legal	A spatial development framework is required as part of the City's IDP in terms of the Municipal System Act. Hence the CTSDF will be approved as part of the City's IDP in terms of the MSA. IN addition the CTSDF will be submitted for approval to the provincial government in terms of the Province's planning legislation - LUPO. While it is agreed that this planning legislation is outdated it remains the planning legislation with which the City must work in the Western Cape. The City has tried to balance the normative approach and the need for clear planning direction. Engagements were held with neighbouring municipalities and draft versions of the CTSDF were circulated to neighbouring municipalities for comment. The drafting of the CTSDF was undertaken under the auspices of a political task team of the City's Planning & Environment Portfolio Committee and has obtained political endorsement at key milestones in its development process. The public participation process has been extensive and has exceeded legal requirements both in terms of the MSA and LUPO. A more detailed report on this process followed is available on request - and has been submitted to the Provincial Government for review. the draft CTSDF has been circulated on a number of occasions for cross-sectoral input within the City administration as well as across the departments of the provincial and national spheres of government and state-owned enterprises.
114.1	Willie van der Westhuizen	Western Cape Property Development Forum	Development Facilitation Act and the principles enshrined in it are relevant in the Western Cape.	12. Legal	The Chapter 1 Principles of the Development Facilitation Act have been central to the approach taken in drafting the CTSDF. Ch 2 reflects authors correction.

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114.6	Willie van der Westhuizen	Western Cape Property Development Forum	Heritage: The legal requirement is for an approved Heritage Inventory. This does not exist. It should involve consultation with the affected property owners.	12. Legal	The City's heritage inventory is to be submitted to the relevant heritage resources agency as required by the NHRA. Section 30 (7) of the NHRA states that a provincial resources authority shall not list a place in a heritage register without having consulted the owner of such a place regarding provisions to be established for the protection of the place.
114.7	Willie van der Westhuizen	Western Cape Property Development Forum	Inclusionary housing is still in draft form at a National level.	12. Legal	The CTSDF promotes integration as one way in which the city can transform from its apartheid legacy as well as realize opportunities that may alleviate the widespread poverty in Cape Town and contribute to greater social cohesion. The CTSDF promotes creating opportunities to accommodate poorer households in mixed income and mixed use developments as a principle that would guide decisions amongst other principles not as a condition or pre-requisite. CTSDF recognises that Inclusionary Housing Policy is still in draft form.
114.9	Willie van der Westhuizen	Western Cape Property Development Forum	Grandfathering principle - applications filed before the adoption of the CTSDF should be recognized under the old guide plans and the MSDF adopted in 2001.	12. Legal	Once the CTSDF is approved, all development applications will be assessed in terms of this framework, and there is no provision for a 'grandfathering principle'.
117.1	Sydney Holden	Sydney Holden Town Planners/Property Consultants	Concern regarding top down approach. More appropriate to finalize the District Plans before the CT SDF. Also District plans should be considered and approved as 4 (6) plans, with more detailed 4(10) structure plans acting as the primary informants.	12. Legal	The purpose of the CTSDF is to provide strategic vision for the desired spatial form of the city, and to guide the proposals contained in the more detailed district plans. The CTSDF is to be approved as a 4 (6) structure plan and will provide overarching guidelines for lower order district plans which can not also be approved as 4 (6) plans. The CTSDF will provide a more flexible broad brush framework than the District plans.
119.1	Gerhard Swart	Urban Dynamics Western Cape Inc.	Consistency principle : The approval of the CTSDF as a draft plan should be considered so that later amendments based on detail at the District Plan scale can be avoided. Also questions whether there is a transitional arrangement to accommodate possible amendments based on the findings of the District Plan.	12. Legal	The CTSDF is required to be approved as a 4 (6) structure plan in terms of LUPO as a precondition to the old Urban Structure Plans being withdrawn. Later amendments based on the findings of the District Plan will take the form of amendments if and when necessary.

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124.01	Mowzer Abraar	Dept of Water Affairs	Need to consider the National Water Act in section 2.2 and Strategic Framework for Water Services in section 2.3.	12. Legal	These Acts have been included in the relevant policy sections.
125.01	Leona Bruiners	PGWC: Rural Development & Land Reform	Include reference to: Thr Restitution of Land Rights Act, 22 of 1994 The Distribution and Transfer of Certain State Land Act, 119 of 1993 The Upgrading of Land Tenure Rights, 112 of 1991 Include reference to: Thr Restitution of Land Rights Act, 22 of 1994 The Distribution and Transfer of Certain State Land Act, 119 of 1993 The Upgrading of Land Tenure Rights, 112 of 1991	12. Legal	These Acts have been included in the relevant policy sections (refer relevant section in Ch 5).
125.01	Leona Bruiners	Rural Development and Land Reform	Include in section 2: Thr Restitution of Land Rights Act, 22 of 1994 The Distribution and Transfer of Certain State Land Act, 119 of 1993 The Upgrading of Land Tenure Rights, 112 of 1991	12. Legal	These Acts have been included in the relevant policy sections (refer Ch 5).
125.02	Leona Bruiners	PGWC: Rural Development & Land Reform	Link with the IDP is not very clear	12. Legal	Council is to approve the CTSDf as a sectoral plan attached to the IDP.
125.02	Leona Bruiners	Rural Development and Land Reform	Link with the IDP is not very clear	12. Legal	Council is to approve the CTSDf as a sectoral plan attached to the IDP.

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	Mlamleli Pukwana	Food and Allied Workers Union	<p>Process concerns eg legal positioning of the SDF wrt eg IDP. Fail to understand involvement of LUPO. Tension between MSA (promotes normative principles) and LUPO (emphasizes control) requirements. Concern re review cycles. No evidence of interaction with surrounding municipalities. Little evidence of political direction, contentious issues etc. Public participation has been limited and has not built 'capacity' for participation among marginalised groups. Little evidence of cross sectoral input.</p>	12. Legal	<p>A spatial development framework is required as part of the City's IDP in terms of the Municipal System Act. Hence the CTSDf will be approved as part of the City's IDP in terms of the MSA. IN addition the CTSDf will be submitted for approval to the provincial government in terms of the Province's planning legislation - LUPO. While it is agreed that this planning legislation is outdated it remains the planning legislation with which the City must work in the Western Cape. The City has tried to balance the normative approach and the need for clear planning direction. Engagements were held with neighbouring municipalities and draft versions of the CTSDf were circulated to neighbouring municipalities for comment. The drafting of the CTSDf was undertaken under the auspices of a political task team of the City's Planning & Environment Portfolio Committee and has obtained political endorsement at key milestones in its development process. The public participation process has been extensive and has exceeded legal requirements both in terms of the MSA and LUPO. A more detailed report on this process followed is available on request - and has been submitted to the Provincial Government for review. the draft CTSDf has been circulated on a number of occasions for cross-sectoral input within the City administration as well as across the departments of the provincial and national spheres of government and state-owned enterprises.</p>