



**Greater Cape Town Civic Alliance**  
**Comment on City of Cape Town Spatial Development Framework**  
**Date: 31 January 2011**

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## **PUBLIC ENGAGEMENT**

Civil Society is well aware of, and deeply concerned about, the advantage given to the development fraternity by way of the 'Developers Forums' both at Local and Provincial levels.

The Cape Town Property Developers' Forum ("an initiative of the City") came into being in November 2007 and has regularly engaged with the City. Subsequently the Western Cape Property Development Forum was formed and their initial contact was also with the City of Cape Town, but are now also working closer with Provincial Government: Western Cape (PGWC).

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 forums.

For this reason, it becomes imperative that the SDF process be accommodating of the opinions and desires of Civil Society and for these opinions to be respected and responded to.

It was alarming to note that as part of the CTSDF public engagement process, 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. The 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.

The public participation process is called into question where (for example) it was communicated that where issues are raised of local significance, that these must be diverted to "district level" engagement. "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.

Public Participation goes way beyond mere advertising. 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.

## INFRASTRUCTURE

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.

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.

In May 2003 the MSDF spoke to the issue of failing infrastructure and a lack of resources for future development. Eight years later, in 2011, we are still talking the exact same issues and for the same reasons.

## MORATORIUM

Under these circumstances and at a time when the SDF places the future strategic vision of the City on the table, it is most opportune and responsible to implement a much needed moratorium on all non-essential development.

The allowance for a moratorium is a local planning issue, it needs to pre-empt the promulgation of the SDF or at least be conditional thereto and must also form part of the Zoning Scheme. It's a very intense process which allows for a 'planning pause' during which time, and in 'good faith', studies and reviews of existing policies and processes are undertaken. It is intended to provide the community and planning authorities with the time to conduct and review studies necessary for adopting or revising a land use plan and related regulations. In our case it will be a temporary emergency measure, the duration of which will depend on the outcomes, one being 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.

As far as the lack of infrastructure is concerned there is damning motivation for a complete moratorium on all non-essential development. The environmental impacts on land, riverine and marine environs is extreme with the consequential impacts on human health and the health of our wildlife.

Infrastructure is unfortunately a very politicised domain and based on both the local and provincial interrogation of this Draft SDF, neither of these entities raise the issue in the context of actually immediately limiting future development, but rather communicate through well worded policy statements the need for infrastructure to be capable and well maintained. It further opens the door to litigation against the Government by the development applicant, purely based on the fact that they wish to develop their property, but an outside influence is restricting them, in this case it would be the inability of the municipality to supply the required bulk infrastructure.

Once an application receives a letter confirming available bulk infrastructure from the municipality, we must be in a position to rely on the provincial authorities to interrogate this.

**Failure to address environmental degradation and pollution can result in legal action against the City in terms of the National Environmental Management Act (Act 107 of 1998) as well as the National Water Act (Act 36 of 1998)**

**With due regard for continued public endangerment and environmental impacts**

Please see supporting documentation under **ANNEXURE A**

## URBAN EDGES

Based on its reference in the Draft CTSDF (about 80 times) the issue of Urban Edges is raised. Based on the inclusion of supporting in the plans and publications section of the City Website (**ANNEXURE B**) the issue of Urban Edges is raised.

The Provincial SDF states that it is required for urban edges to be held fast for sufficient time to allow new development to re-orientate itself inwards. The 'Provincial Urban Edge Guideline', which forms part of the PSDF goes further to describe the unacceptable consequences of urban sprawl, the functions of an urban edge, and the need for absolute urban growth management. However, in the Draft CTSDF:

1. Urban edges have been increased, which dramatically expanded the edge into areas that were originally excluded in the CT 2001/2006 urban edge studies
2. These new and expanded urban edges as reflected in the previous Draft were designated as being "URBAN INFILL", i.e. read densification/intensification and required housing.
3. In this Draft these areas are now reflected as 'URBAN DEVELOPMENT'. This telling change has not gone unnoticed.

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' in general, a thing of the past, commonly referred to as the "dumbing-down" of process.

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.

The way the process is being undertaken further 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.

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. 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). 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 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.

### 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

**we will not be able to support the moving of the urban edge.**

### **Strategic Environmental Assessment**

There is a requirement for a Strategic Environmental Assessment as per the MSA. There has not been an adequate Strategic Environmental Assessment, 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. The determination of the likely negative environmental impacts, must result in required mitigation measures against any negative impacts being included as a condition to the CTSDF approval.

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. (and not in a good way!)

The required SEIA needs to inform the following raised issues and make it a requirement that actions to mitigate against any negative impacts become a condition :

- The public need to know the cumulative impact of the zoning scheme and the SDF on communities
- The Recreational and Health value of the unique environment should be taken into account (Social Priority Action areas)
- The plan makes much of the social justice issue, but this needs to be matched by respect for environmental integrity.
- New population densities have implications for Koeberg's disaster management plan
- Any densification policy needs guidelines aimed at managing consequences.
- Alienation of public open space should be allowed only by trade-offs guaranteeing more space for riverine corridors.
- Human success is determined by a balance of biological, economic, social and political considerations – space is critical for this to happen.
- The Western Cape has a long conservation tradition. This should be emphasized in the plan.
- There are inherent contradictions like maintaining land for urban agriculture while promoting industrial development.
- There is confusion about the interaction between the SDF and CTZS and which has the legal power.
- The restoration of degraded areas must be emphasized.
- 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.
- Desirability criteria need more thought.
- There should be a whole City economic plan that goes beyond the IDP budget and gives value to the City’s natural assets.
- There are various cumulative impacts associated with compaction and densification such as Traffic, Sewerage, Solid waste, Trampling, Vagrancy etc
- In implementing such a plan there is need for key over-riding principles with appropriate funding and staffing
- The document has a “something for everyone flavor”. There is little chance of tangible implementation.
- It is important to increase the amount of space for food production – NB agricultural zoning and methods of food production.
- 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.
- There needs to be consistency between the Guide Plan, the SDF and district plans
- Biodiversity must not be linked to pockets for tourists, but to genuine conservation efforts.
- A densification policy paves the way for more as-of rights including cell masts.
- 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.”
- The protection of the City’s estuaries must not be compromised by densification.
- Mitigation and rehab must be part of any mining application.

### **Time lines:**

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.

- 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.
- Reviewing is also a double edged sword that allows chiseling away at protection. We need a hard provisional policy.

### **General:**

While we understand that the proposed development path should within reason be adaptive over the longer term, we are concerned that:

- This should not be used as an excuse for dealing with spatial development in a piecemeal way (Spatial development must, as you have said, promote consistent and predictable decision making as you point out in 1.2)
- The city does not do enough work anticipating different scenarios with regard to economic, environmental and social forces
- The city uses different population projections in different documents.
- Whilst population projections are expected to be greatly influenced by the SDF over time, we are extremely concerned about the lack of accurate baseline statistics on the present population. Having viewed the rapid and almost exponential growth in urban development over the last ten years, the City's estimate of only 3.7 million is questionable. An international source of data (data obtained locally) places the Cape Town metro population at 7.3 million. If this figure is closer to the actual, then it would explain the present limitation of resources and infrastructure. There is reserved support for this figure, as apposed to the City's communicated figure. We will only truly know in 2012 or 2013 (Census 2011).

- At the top of page 17 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 subsidised 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.
- 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.
- 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.
- 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.
- 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.
- 3.3.2 refers to a more compact and efficient form of urban development. However 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.

### **Policy 2**

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.

### **Policy 3**

There are already policies in existence to support this. Why is it only now being "introduced" through the CTSDf.

**Policy 6**

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.

**Policy 9**

Relationship between City & PRASA needs to be improved

**Policy 10**

We have been told by the city's Transport Department that the city intends to take over 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 presently in no position to provide rail transport, and is unlikely in the near future to obtain national support to make this possible.

**Policy 11**

Too little attention is being given to parking for commuters at bus stations, and without this it will not succeed.

**Policy 12**

We agree that lighter, more efficient rail systems of the kind on the Gautrain routes should be introduced.

**Policy 13**

Routes must be safe and well maintained. Too much attention is currently being given to new areas

There is also an enormous need for cycle and pedestrian routes to and from transport interchanges, if we are to encourage those who do not have vehicles to use public transport. 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.

**Policy 14**

Will not succeed without public parking for commuters at transport interchanges

**Policy 16**

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. There is a lack of clarity and true intent.

**Policy 17**

Supported but unclear with regard to the actual need for a second airport

**Policy 18**

Create and manage a functional interface between ports/harbours and their surrounding areas

**Policy 19**

Current experiences (e.g. Princess Vlei) suggest that policy alone is insufficient.  
Policy compliance dependent on outcomes of District SDP process

**Policy 20**

Critical that extensive infrastructure upgrades be commissioned  
Clamp down on illegal water extraction and promote reduction of water demand

**Policy 24**

Conditional support dependent on SDP's & overlays  
Policy is supported but reality has proven to be contradictory (Uitkamp)

**Policy 25**

Much more transparency needed from the City regarding infrastructure limitations and requirements

**Policy 27**

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.

**Policy 28**

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'.

**Policy 30**

This Policy is short on detail  
That the city appears to be paying lip service to this issue, rather than to take this seriously  
That the City is paying insufficient attention to the issue of energy demand.  
That there is no reference here to recycling water.

**Policy 45**

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)

**Policy 48**

Policy supported, but reality appears to be stronger than any written word. (Princess Vlei proposed Shopping Mall)

**Policy 49**

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.



## **ANNEXURE A**

**Going back eight years (2003), the following was said:**

MSDF REVIEW  
PHASE 1  
SPATIAL ANALYSIS, TRENDS AND IMPLICATIONS  
CITY OF CAPE TOWN  
**April/May 2003**

### ***WASTE WATER TREATMENT***

Rapid urban growth on the periphery of the CMA (in Blaauwberg, Durbanville, the south-east, and Helderberg) have led to **major capacity problems at the available waste water treatment plants**. Further urban growth in the Table View and Durbanville areas, particularly, will need major new investments if waste water needs are to be met.

### ***WATER SUPPLY***

The CMA has limited water resources, and in the past this has required water restrictions at particular times of the year. Over and above the development of a new major dam (the Skuifraam Dam on the Berg River), which **will only address the problem for the next 15 years**, the Water Services Development Plan argues for demand management measures to contain demand growth. Even with these measures there is the possibility that in the future alternative sources such as sea water desalination will have to be considered. Such measures will raise the cost of water considerably.

### **CONCLUSIONS**

The form of urban development in the CMA has placed serious demands on all bulk infrastructure, but particularly on the waste water treatment system. Very rapid residential development has been allowed to occur in the peripheral parts of the CMA, and particularly in Blaauwberg and Tygerberg, and inevitably treatment plants serving these areas have reached their capacity. The City is now faced with the prospect of allocating a significant proportion of its scarce resources to the upgrade or duplication of these facilities – a cost which will be borne by the ratepayers of the whole CMA. National government now sets standards for the performance of this infrastructure which have to be met. **More serious however, is the possibility that if upgrade and maintenance is not carried out, there could be major environmental disasters.**

### **There is now a realisation amongst planners worldwide (Cars et al, 2002)**

that, for cities to perform well in a global economy, it is necessary to pay attention to the quality of physical “place”, and particularly the physical image and identity which a city presents to the outside world. They also realise that for cities to perform economically, what counts is not just a good economic policy, **sound infrastructure**, or an efficient transport system (although these are important in their own right), but it is the way in which these various aspects of the city work together to create a particular social and economic “milieux”, that makes it attractive to investors. What both investors and city residents seek is a *meshing* of the various functional aspects of a city to create particular place qualities which make both good living environments and a good place to do business. **This requires co-ordination around the kind of place which the public authorities are helping to shape.**

**?????????**

**SO HOW ARE THE “PUBLIC AUTHORITIES” DOING TODAY?**

Some examples:

**City of Cape Town**

**REPORT To SUBCOUNCIL 08**

**ITEM NUMBER : Q8SUB 19/07/10**

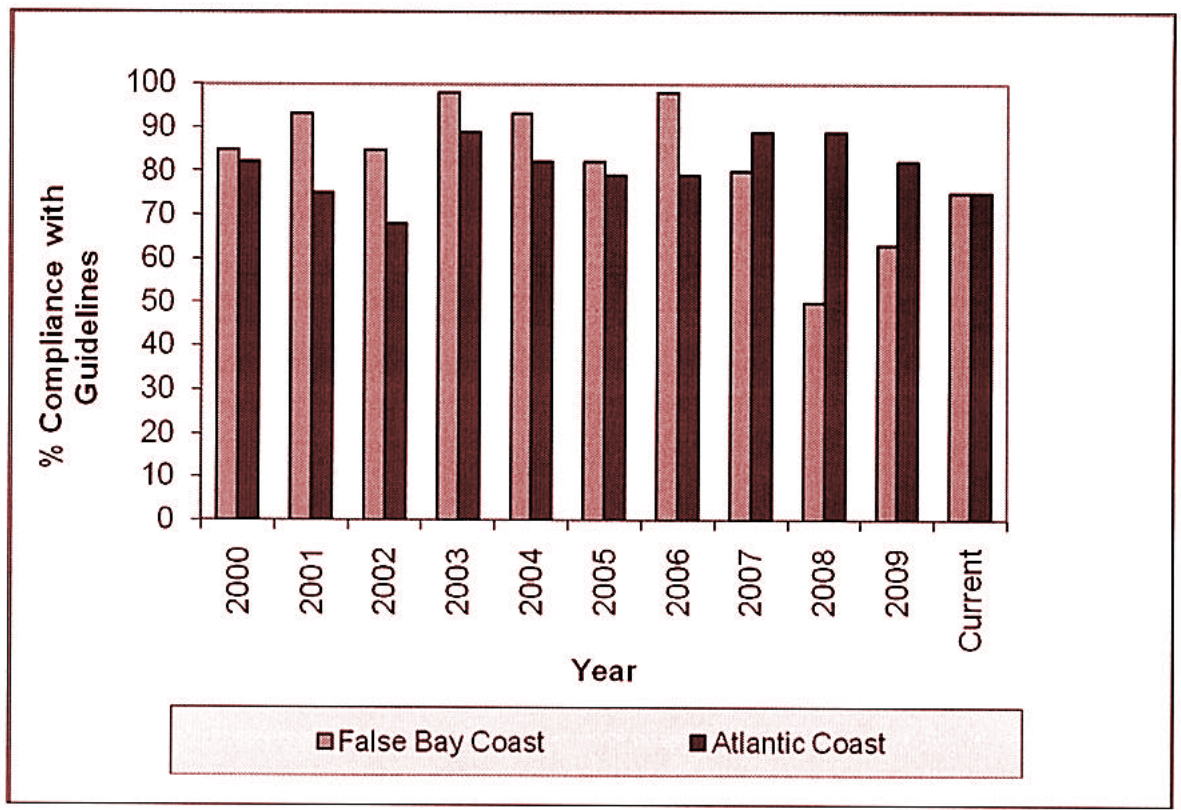
**Metro-Wide Water Quality Trends**

Inland waters are sampled and tested on a monthly basis. The approximately 100 sample stations are located on major rivers, canals and water bodies such as "vleis" across the entire metropolitan area. Long term trends indicate that **levels of faecal or bacteriological contamination are increasing as reflected by declining compliance levels** (see bars on graphic below) whilst nutrient enrichment of the systems has also increased as indicated by the average level of phosphorus (P) in the water. It is important to note the data presented below has been averaged across locations monitored. Many inland systems in the metropolitan south east, although not sampled for water quality, are known to be highly polluted.

Water at all recreational beaches is sampled on a fortnightly basis. **Long term trends in this regard indicate a decline in compliance with the standards as indicated by the graphic below.** As can be expected, faecal / bacterial contamination levels in the coastal waters are largely influenced by river and stormwater discharges into the marine environment, both of which are affected by various **land-based pollution sources**.

The overall trends highlighted above **indicate an escalating problem** which if not addressed will precipitate the following consequences:

- 1) Increased exposure of residents and visitors to serious health risks
- 2) Continued degradation of sensitive natural environments and recreational waters (river and beaches) which would ultimately compromise the City's reputation as a premier tourism destination.



### **Background and Introduction**

The Carte Blanche programme aired by M-NET on Sunday 16 May 2010 highlighted the serious issue of inland and coastal water pollution and associated risk to human health, the natural environment and tourism. A range of community members, politicians and officials were interviewed during the programme which focused on Cape Town and Hout Bay in particular. A number of references were made to routine quarterly reports to the Transport, Roads & Stormwater Portfolio committee on inland and coastal water quality.

### **Wildevoelvlei in the Noordhoek**

This pollution in the vlei is caused by the under-treatment of sewerage from the Wildevlei sewerage works in Imhoff. The problem originates from development of residential areas without considering the capacity of the current infrastructure, or without increasing the existing capacity.

**The Diep River Estuary**, by definition the river and vlei from the Blaauwberg Road bridge in Table View to the river mouth at Woodbridge Island in Milnerton, is recognized as one of the most important estuaries in the Cape Metropolitan Area. Over the years the estuary has been affected by various developments on its shores, as well as by facilities such as the Potsdam Waste Water Treatment Works.

### **City of Cape Town : July 2010**

#### **CATCHMENT, STORMWATER AND RIVER MANAGEMENT INLAND AND COASTAL WATER QUALITY REPORT**


#### **EXECUTIVE SUMMARY**

This report provides an overview of inland and coastal water quality for the twelve month period ending 30 June 2010. Results are compared against nationally prescribed standards and historically measured trends **indicating a general decline**

1. ITEM NUMBER: 08SUB **18/07/10**
2. SUBJECT : REQUEST FOR EXTRA **FUNDING FOR WASTEWATER TREATMENT PLANTS IN THE HELDERBERG**
3. PURPOSE

To inform the Subcouncil that there is **no extra funding available** for the replacement of **failing infrastructure** and for urgent maintenance and upgrading work needed at all wastewater treatment plants in the Helderberg.

# ANNEXURE B



CITY OF CAPE TOWN | ISISEKHO SASAKAPA | STAD KAAPSTAD  
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Sun, 30 Jan 2011


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## Spatial Development Framework


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### Maps, policies and publications

**Cape Town Spatial Development Framework : Brochure (DRAFT)**  
| [English](#) | [Afrikaans](#) | [Xhosa](#) | (PDF, ~650kb)



**Cape Town Spatial Development Framework (DRAFT)**  
Technical Report (PDF, ~2.4mb)



**Maps:**

- 6.1 Route designation - land use functionality
- 6.2 Economic activity
- 6.3 Biodiversity network
- 6.4 Aquatic network
- 6.5 Agricultural areas to be protected
- 6.6 Alignment of future growth & infrastructure investments
- 6.7 Major land extensive precautionary areas
- 6.8 Destination places and scenic routes
- 7.1 Draft Cape Town Spatial Development Framework
- 8.1 Social facility recreational open space priority action areas
- 8.2 Transport and roads priority action areas
- 8.3 Housing and infrastructure priority action areas

Erratum Figure 3.1 (Cape Town population trends and projections: 1996-2031) - [click here to see the corrected Figure 3.1](#)

### Studies conducted in support of the final draft Cape Town Spatial Development Framework

- ▶ **MSDF Review: Phase 1 spatial analysis of trends and implications** (City of Cape Town with support of Prof V Watson) (2003)
- ▶ **Agricultural land review** (iKapa Enviroplan, Setplan – DJ Environmental Consultants Joint Venture in association with Agri Informatics and Prof T Kleynhans) (2008)
  - ▶ Table 1: Agricultural area review and recommendations
  - ▶ Table 2: Protection and use status of agriculture areas
- ▶ **City of Cape Town Cost Surface Model Volumes 1 & 2 (Brendan McGill) (2008)**
  - ▶ Output cost surfaces (cover)
  - ▶ Volume I - The user interface
  - ▶ Volume II - Algorithms for cost calculations
  - ▶ Maps : Combined, Electricity, Sewage, Stormwater, Transport (all modes), Transport ( public transport only)
- ▶ **Evaluation of developable land within the Urban Edge** (City of Cape Town) (2010)
- ▶ **Summary guidelines and standards for the planning of City of Cape Town social facilities and recreational spaces** (CSIR) (2010)
- ▶ **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** (CSIR) (2010)
- ▶ **Analysis of the spatial economy of Cape Town** (City of Cape Town) (2010)
- ▶ **Demographics scenario (Discussion paper), August 2010**

### Urban Edge

- ▶ PEPCO (Planning and Environment Portfolio Committee) Report
- ▶ PEPCO Recommendations
- ▶ Metropolitan/urban and Coastal Edge Map

The Metropolitan/urban and Coastal Edge Map shows where requests were received to review the alignment of the urban edge. The number on this map (circled in yellow or orange) refers to the detailed map below that provides information on the request received.

Map1, map2, map3, map4, map5, map6, map7, map8, map9, map10, map11, map12, map13, map14, map15, map16, map18, map19, map20, map21, map22, map23, map24, map25, map26, map27, map28, map29, map30, map31, map32, map33, map34, map35, map36 and map37.

- ▶ **Response to comments from the public, other spheres of government and state owned enterprises on the first draft Cape Town SDF / Index**
- ▶ **Response to comments from the Expert Review Panel on the preliminary final draft Cape Town SDF**
- ▶ **CTSDF Submission for provisional inspection in terms of sect 4(5) of the Land Use Planning ordinance**

To download a copy of the CitySpace: Planning Cape Town Background Information Document, click [here](#).

To download a copy of the 2009 CitySpace: Planning Cape Town newsletter, click [here](#).

To download a map of the entire Cape Town metro area, showing the eight planning district, please click [here](#) (PDF, 2.25mb).

To view a copy of the Western Cape Provincial Spatial Development Framework, click [here](#).

To download a copy of the Metropolitan Spatial Development Framework (MSDF), click [here](#).

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