

GREATER TABLE VIEW ACTION FORUM

(Non-Profit Organisation No. APP-16/244140)

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Comments on Blaauwberg Road LSDF.

We thank the City for the diligent preparation of this document and the opportunity to comment.

Overview.

The current draft LSDF document must be read with an understanding of the City of Cape Town's past achievements and policies. As a stand alone document this LSDF document seems to be a credible document. However:

The City has failed to implement the Blaauwberg Road Management Plan and all other district plans allowing unsustainable densification that favor the short profits of developers and short term revenue considerations for The City coffers.

The last eight developments approved on Blaauwberg Road have been allowed with residential only. This City has missed the opportunity to develop in line with the District Plan and the Management Plan for Blaauwberg Road and support mixed use. It has missed the opportunity to promote densification and employment opportunities. This would have been in line with Blaauwberg Roads status as an activity route. These eight developments all have been passed by the City of Cape Town with parking bays for 1.25 bays per dwelling unit. This within a PT2 parking zone. Again the City approved these developments against its own integrated transport policy, Transport Orientated Development policy and Integrated Development Policy. Promoting the reliance on private transport that is unsustainable. Again the City does this to promote the short term profits for developers and its own revenue consideration.

The real attitude of the City is revealed by the decision makers of the MPT (Municipal Planning Tribunal) a decisions making body where applications are presented by City of Cape Town officials and decisions made by City of Cape Town officials. The colleagues of the writers of this LSDF document. At a recent MPT hearing for an application within this study area the MPT committee allowed a development that allowed 1.25 parking bays within the PT2 parking area. And commented 'the City does not have to make decisions based on policy' they went on to state that 'The City cannot dictate to a developer that they cannot provide parking if the developer feels it needs to provide parking to sell its development. The reality is that the City has constantly made short terms decisions that are unsustainable in order to support its densification policy.

Further evidence of this is the development of Parklands Main Road. Whilst not in the study area of this draft it is a stunning example of what is delivered over what was planned. Parklands Main Road is also an activity route and as such mixed use development where planned. However we see residential only along one side of this activity route. By allowing this the City has lost the opportunity to provide

economic opportunities and employment. The other side of Parklands Main Road we see commercial activities but no housing opportunities. So whilst The City claims it will support mixed use to promote both densification and economic growth it has failed on Parklands main road and it is failing on Blaauwberg Road. This road now has informal traders who would have benefited from the provision of mixed use property. We also see illegal trading activities with residential areas. Despite the City claiming to support micro business. The existence of this illegal trading must be considered visual proof that the City has failed. Again the City took the short term profits of developers and its own revenue over the provision of a sustainable City.

The people of Table View have for many years suffered from the terrible smell of raw sewage. The residents of Milnerton have had to endure the smell of raw sewage from the pollution in the Diep River. The City initially lied about the source of this pollution and attempted to cover up the real state of the effluent from the Potsdam Waste Water Treatment Plant. However it is now established that the Potsdam Waste Water Treatment is over capacity. This was predicted in the City of Cape Town district plan 2012. Indeed this plan called for the upgrade of the Potsdam Waste Water Treatment Plant in 2012. This was required for densification to proceed. During this period until 2022 the City promoted the densification of Table View knowing that their Potsdam plant was running out of capacity. Every land use application had to claim that there was sufficient capacity at Potsdam when City officials knew there was not sufficient capacity. The results of this illegal development is the total destruction of the Diep River and the closing of our tourist beaches. The City has also put the health of residents at risk whilst refusing to acknowledge the health risks their delinquent actions have caused. The City put densification ahead of sustainable densification in line with their goals to create a sustainable City.

Looking at policies from the high level IDP (Integrated Development Plan) to the TOD (Transport Oriented Development Policy) and the Integrated Transport Plan. It is clear that the City has failed to implement these policies.

The draft LSDF document refers to Blaauwberg Road having 'high level' transport in the MyCity BRT lane. This is manifestly incorrect. The BRT runs from Potsdam to the R27 the section of Blaauwberg Road from the R27 to Marine circle has no such BRT lane. Yet the City wants the greater density of dwellings around Marine Circle. Whilst at the same time stating they will enforce the PT2 parking.

The BRT lanes from Blaauwberg Road run into Potsdam and along the R27 into Milnerton. Both of these routes out of Table View end one in Milnerton the other along Potsdam Road. This means that buses have to join normal traffic. So, there is not high level transport link into the CBD or Century City.

We are aware that in Milnerton the City is looking at a contraflow so that the MyCity buses will have use of the BRT for busy periods either to the CBD or from the CBD. But this creates unsustainable tidal flow use of the MyCity Bus system.

The draft does not take into account the capacity of the MyCity Bus. This is given as a headway of 90 seconds. Or a bus every 90 seconds. Each bus has a capacity of 53 people. Therefore its theoretical capacity is 2120 per hour. Or 6360 people for the three-hour peak period. It seems that the City has not considered this capacity in this draft and has merely made that claim there is a public transport system. The capacity of the MyCity would not cope with the level of densification proposed in this draft. If then as this draft claims the City will enforce the PT2 parking policy. How then does the City expect residents to access work opportunities and social services.

The City has set as a policy statement that it wants to create an integrated sustainable City. However, what it has delivered is a MyCity bus system that runs separately from the City's train infrastructure. In a world class city, the bus system would normally complement and act as a feeder to the rail network. The train network will always carry far more passengers than a BRT system. In terms of Table View it is served by a semi-BRT service that does not cover the entire Blaauwberg Road. The MyCity bus will take residents to Paarden Eiland, the CBD, Montague Gardens and Century City. To access the work opportunities in Bellville, Epping and Philippi residents would need to use private vehicles, minibus taxi's or buses. Currently the public transport system to Blaauwberg Road is limited by capacity, it is not integrated and will not promote a sustainable city or financially sustainable transport system. Density must take into account the constraints of the public transport system in order for the City to be able to meet its policy objectives.

The City has made much of the need for densification. It hinges some of this justification on the use of existing infrastructure. However, it has failed to upgrade this infrastructure. The area is plagued with electricity outages, water outages and sewer overflows as aging infrastructure fail. We need to see and agree a fully costed plan for the upgrade of aging infrastructure to cope with the densification proposed. Densification should not be permitted if the City and Eskom cannot commit to these upgrades. Given that the time frame for delivery of the Potsdam upgrades is 20 years the City needs to justify its statements it will cope with the proposed densification proposed for the area. Experience has shown us that the City acts retrospectively not proactively.

It is concerning that the numbers simply do not work. The level of Densification proposed sees an area moving from the density of SR1 zoning to GR1 and above. It seems that City has failed to consider the constraints of the MyCiti bus system. The City needs to revisit and justify their claims around public transport. Densification must be limited to transport and infrastructure capacity. Failure to balance population growth to transport and infrastructure capacity. Would be reckless and against the City's commitment to create an inclusive and sustainable city.

Blaauwberg Road LSDF

As we have stated earlier the City has continually failed to implement every policy document it has produced.

Detailed Comments.

Precinct 1

- More details need to be given on the support of eight story's at intersections of Blaauwberg Road. It needs to state that this should be supported for applications at intersections and also abuts Blaauwberg Road.
- This section of Blaauwberg Road cannot be densified as it is not served by a high-level transport network.
- We support the redevelopment of marine circle. However, this must be done with the input of users of the area, business owners and landowners. It can only be allowed after a commitment from the City on public transport and infrastructure.
- We support the enforcement of the PT2 parking zone.

Precinct 2

- More details need to be given on the support of eight story's at intersections of Blaauwberg Road. It needs to state that this should be supported for applications at intersections and also abuts Blaauwberg Road.
- We support the enforcement of PT2 parking zone.
- Densification can only be permitted within the capacity of MyCiti bus network. This must be fully costed given that the system is not financially sustainable.
- Further investigation needs to be done as to the actual capacity of the MyCiti bus network. We are concerned that the capacity of a 90 second headway is not achievable. It would be delinquent to allow densification that would encourage the use of private vehicles if the public transport cannot cope with demand. Particularly in an area where PT2 Parking rules are enforced.
- The draft makes no mention of the accommodation for the aged and vulnerable. There is sheltered accommodation in the Study area on Norton Square. We need to take note of the vulnerable persons act as well as the City's vulnerable persons policy. We would agree with encouraging three story's on Raats Drive as long as this is mixed use in the section of Raats drive opposite to Norton Square. This section of road is mostly developed so would have not affect on the elderly residents of Norton Square. However, we would suggest that densification should not be supported for one road around Norton Square in order to protect these elderly residents.

Precinct 3

- More details need to be given on the support of eight story's at intersections of Blaauwberg Road. It needs to state that this should be supported for applications at intersections and also abuts Blaauwberg Road.
- Densification can only be permitted within the capacity of MyCiti bus network. This must be fully costed given that the system is not financially sustainable.
- Further investigation needs to be done as to the actual capacity of the MyCiti bus network. We are concerned that the capacity of a 90 second headway is not achievable. This would require 53 people being on the station as the bus arrives. And that 2000 people would need to access stations within a period of an hour. It would be delinquent to allow densification that would encourage the use of private vehicles if the public transport cannot cope with demand. Particularly in an area where PT2 Parking rules are enforced.
- We support the enforcement of the PT2 parking zone.

Conclusion

The City has a credibility problem in that it has allowed densification that clearly damaged the environment whilst it was aware its wastewater treatment plant was over capacity. It has failed to deliver the Management Plan for Blaauwberg Road. As it has failed to deliver the District Plan. It is also concerning that the numbers simply do not work. The level of Densification proposed is too great for the public transport in the area. This would see a continued reliance on private vehicles which is not environmentally or economically sustainable. Residents of the City have a right to consider the actions of the City rather than the words of this and other policies. With this document we are concerned that we are seeing the City produce yet another plan. A plan, it will ignore in favor of short term decision making as is focused on the revenue returns of densification of its favored construction industry.

The City should be focused on delivering an integrated sustainable City. We all understand the need for Density however this need to be close to public services, work opportunities and schools. It needs to cut the cost of travel time and the time people travel to access these services and work opportunities.

We do not see a City that is able to create this world class City of the future. Unfortunately we see a City that exists and thinks in silo's. The results of this silo thinking is creating a City that is not integrated and is not sustainable. We hope that this Blaauwberg Road LSDF marks a turning point and that the City will take responsibility for its past failures. Learn from these failures and move toward implementing the City's IDP.

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