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**To: The Executive Mayor
City of Johannesburg
PO Box 1049
Johannesburg
2000**

**Date: 13 May 2013
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**Attention: Ms Lennette Fouche
Email: Lennettef@joburg.org.za**

Dear Sir

CITY OF JOHANNESBURG: INTEGRATED DEVELOPMENT PLAN 2013/16

We represent the following company and organisations:

- iProp Limited (iProp) (www.iprop.co.za) the owner, investor and developer of extensive areas of centrally located land in Johannesburg;
- SOJO Business and Tourism (SOJO) (www.sojo.co.za) a non-profit organisation established in the south of Johannesburg to promote tourism and related business in recognition of the many economic opportunities that exist in the natural and man made tourism, recreation, and sporting facilities located in the south of Johannesburg and Soweto; and
- KlipSA (Klipriviersberg Sustainability Association) (www.klipsa.org.za) a community-based voluntary association and registered Non-Profit Organisation established to protect, promote and enhance the value of the natural assets in the southern areas of Johannesburg through appropriate sustainable social and economic development.

We wish to thank you for the opportunity to participate and be involved in the development and preparation of the Joburg Integrated Development Plan 2013/16 (IDP). Following the consultation session for the Johannesburg Business Forum held on Friday 10 May 2013, we wish to make the following submission. Key points of this submission are summarised below followed by explanations that are more detailed with motivating and supporting comments.

At the outset, we note our support of the City's Ten Priorities and would suggest that the various proposals and initiatives of iProp, SOJO and KlipSA will contribute to the short, medium and long-term realisation of these priorities. This will be achieved through the promotion of sustainable economic and social development that will protect, promote and enhance the value of the biodiversity and natural assets of the City, particularly those found in the southern areas.

The key points of these proposals and initiatives are as follows with the detailed motivations provide in Annexure A attached:



1. Previous Submission: Recognition and Inclusion of Major Development Initiatives

Arising from previous submissions to the GDS2040 and IDP 2012/16, which were acknowledged and referenced for incorporation into City economic and spatial development policies:

- We request the City to indicate their support for the principles for the use of UDZ and special rating zones for development in the East West Development Corridor and initially for the Gauteng Smart City at Nasrec.
- We request the City to include explicit acknowledgment of the concepts and principles of the establishment of an Agritropolis based on Klipriviersberg Economic and Ecosystem Development Zone (KEEDZ) in the southern areas of Johannesburg.

2. Proposed Gauteng Agritropolis: Klipriviersberg Economic and Ecosystem Development Zone (KEEDZ)

The KEEDZ development initiative offers Gauteng City Region wide opportunities to address poverty, provide employment and address food priority requirements to many communities located in the southern areas of Johannesburg and Ekurhuleni and northern areas of Midvaal through the establishment of an extensive urban agricultural hub integrated with tourism and their associated value chains.

3. Rehabilitation and development of mine impacted areas

3.1. Smart City: Recognition and Participation of Key Stakeholders for Delivery

The Nasrec Landowners Forum should be resuscitated to ensure efficient and effective delivery of the Gauteng Smart City at Nasrec through a structured participation of key stakeholders.

3.2. AMD and Project Hloekisa: Release and Delivery and of Mine Impacted Land for Urban Development

With extended understanding and knowledge of mine-impacted areas iProp requests inclusion in projects and processes to ensure the effective and efficient release of these areas for development.

4. Region F Interface Forum: Recognition and Establishment To Improve Service Delivery

Following acceptance of the strategic framework for the establishment of the Region F Interface Forum by MMC Ross Greeff, we request the support and resources to be allocated for proceeding with this intervention to ensure focused and effective delivery of services and facilities.

5. Nodal Development Focus: Establishment of a Network of Urban Management Nodes

In support of the establishment of viable economic nodes through the southern areas of the city by SOJO, we request that support and resources to be allocated for the establishment of City Improvement Districts.

6. Urban Management: Stronger Compliance, Enforcement and Penalties

With widespread and more frequent urban and traffic management problems we request the City to further increase resources and infrastructure to strengthen enforcement and compliance with radical and effective increases in penalties for infringement of laws and regulations.



7. Greenway Project: Public Transport and Biodiversity Corridor along Klipriver Drive

KUBiC (Kliprivier Urban Biodiversity Corridor) has been launched along Kliprivier Drive in partnership with City Parks and we request the support and resources to be allocated for the establishment this Greenway for developing integrated public transport and the establishment of a biodiversity corridor.

8. Joburg's Developmental and Growth Agenda: Driven by Environmental Sustainability

If the City is serious about environmental sustainability driving the developmental and growth agenda, a radical review and change of priorities is required including initiation of integrated sustainability management and reporting frameworks to meet global standards and become recognised as a truly sustainable World Class African City.

9. Brownfield Development: Supporting Sustainable Human Settlement

Brownfield urban redevelopment and rejuvenation should become a priority to meet approved spatial development policies relating to densification and intensification of urban areas and the protection of areas of environmental and biodiversity value.

10. Sustainable Energy generation: Waste to Energy Generation

In addressing solid waste management and energy supply deficiencies the City needs provide the support and resources to attract, retain and expand investment in private initiatives and investment in waste to energy projects based on proven technology.

11. Comments and suggestions on the draft IDP 2013/16

A number of suggestions and proposals have been made regarding the various sections of the draft IDP.

We trust that the above contribution will be of value to the City and the preparation of 2013/16 Integrated Development Plan.

Please contact us should you require any further information or clarification regarding any of the points made in this submission.

Yours sincerely

ANDREW CW BARKER



ANNEXURE A: DETAILED EXPLANATIONS AND SUPPORTING COMMENTS

We would request that reference is made to the submission made last year in the IDP 2012/16 review process, dated 7 May 2012, which was referenced in the final approved IDP document. That submission establishes the basis for the review of the Draft 2013/16 IDP published for public comment and the foundation for this submission.

We trust that this submission will be of value and contribute to the appropriate allocation of resources to support the long-term sustainable development and management of Johannesburg. We would welcome the opportunity to discuss any of these proposals and submissions with representatives of your Council.

We are grateful for this submission being accepted after the arranged Joburg Business Forum consultation session held on Friday 10 May 2013. Despite several requests for confirmation of the submission date, we were only informed of the official date of Friday 26 April 2013 on Thursday 9 May 2013.

In essence, this submission recognises many of the critical challenges, issues and opportunities that have been identified. It proposes and motivates interventions, proposals and responses with particular reference to the mine-impacted areas of the East-West Development Corridor (EWDC) and the southern areas of the city. These are made with a view to promoting and realising sustainable economic and social development that will contribute to the protection, promotion and enhancement of the natural assets of the area.

The submission will initially contain general comments regarding the Draft IDP particularly about following through on previous submissions, updating on projects and initiatives and making proposals for consideration and inclusion. This is followed by comments and suggestions on various components of the Draft IDP.

GENERAL COMMENTS, INITIATIVE AND PROJECT UPDATES AND PROPOSALS

1. Previous Submission: Recognition and Inclusion of Major Development Initiatives

With regard to the submission made last year on behalf of iProp, SOJO and KlipSA, the IDP 2012/16 noted:

"Issues raised will be addressed as part of the on-going implementation of City's plans and specific issues will form part of the refinement of the Spatial Development Framework, Spatial Economic Framework as well as the IDP" (City of Joburg IDP 2012/16: page 54).

In reviewing the Draft IDP 2013/16, we note that elements and components of the proposals and suggestions submitted last year are included. However, the key initiatives for stimulating economic and social development in close proximity to areas characterised by poverty and high unemployment are not included in the City's strategies.

As proposed and accepted through recognition IDP 2012/16, the stimulation of development would be through the promotion of investment in the rehabilitation and development of the mine impacted areas within the East West Development corridor (EWDC) and establishing a major urban agricultural and tourism area with the associated secondary and tertiary industries in the Klipriviersberg Economic and Ecosystem Development Zone (KEEDZ).

We acknowledge that a number of engagements and discussions with politicians and officials on various proposals were held last year. However, very little progress has been made in terms of realisation and implementation. Furthermore, we have received no feedback or response regarding the submission that was made. It is therefore difficult to assess the value of the submissions and whether in fact the effort and time spent in participating and engaging in the IDP review process is



making a contribution to the future development of the city.

We request that the City indicates confirmation of their support for the concepts and principles of the development philosophy and approach outlined in last year's submission particularly in relation to:

- the mine-impacted areas through promoting and supporting development using instruments such as UDZs and special rating zones (an initial area example being for the Gauteng Smart City at Nasrec); and
- the southern areas of Johannesburg focusing on establishing an agriculture and tourism economic hub with associated supporting industries and services.

It is important to note that, the confirmation by including reference to these initiatives in the IDP are extremely important to be able to secure local and international funding and investment for the implementation of the projects and proposals.

We would request that the City recognises that participation in collaborative processes and consultation requires an exchange of ideas and views and not purely "one-way traffic" information flow. If the City is committed to "engaged Active Citizenry", processes of on-going participation and engagement will need to be established with key stakeholders in residential and business communities. This is required to create understanding as a basis for productive and fruitful collaboration and engagement. This should be a key aspect of the proposed rollout of Community Based Planning and will certainly be a key component of the above-mentioned initiatives.

It is our contention that the various proposals and initiatives established through collaborative partnerships initiated by iProp, SOJO and KlipSA will ultimately support, contribute and add value to the master programmes and priorities of the Joburg IDP.

2. Proposed Gauteng Agritropolis: Klipriviersberg Economic and Ecosystem Development Zone (KEEDZ)

As noted in the Joburg GDS2040: *"Environmental sustainability is often viewed as an afterthought, but should, in essence, drive the City's developmental and growth agenda."* (Joburg GDS 2040 pg 64). With this as a primary objective, the proposals and concepts for the development of the southern areas of Johannesburg focusing on intensive urban agriculture and integrating tourism has been developed and refined through the past year.

A number of stakeholders have been identified and involved in making contributions and suggestions through extensive presentations, discussions and workshops that have been held with MMCs, councillors and officials from Johannesburg, Ekurhuleni and Midvaal, community, business and residential organisations. The concept has also been presented to politicians and officials of Gauteng, including the Gauteng Legislature at the Economic Development Summit and to the Gauteng Integrated Infrastructure Visioning Workshop, and also representatives of national departments.

During these consultative processes with a wide variety of stakeholders the concept has been further developed and refined. It has been suggested that KEEDZ, as a future economic development zone for Gauteng City Region encompassing areas of Johannesburg, Ekurhuleni and Midvaal, could be considered as an Agritropolis were social and economic development is stimulated through intensive focus on urban agriculture and tourism with a view to protecting promoting and enhancing the value of the biodiversity of the area.

Establishment of the Agritropolis will support the recognition and promotion of environmental, economic, social and spatial linkages between the Metropolitan areas of the Gauteng City Region.

Some of the key considerations of the Agritropolis include:

- GDARD C-Plan and Joburg Regional Biodiversity Plan identify the Klip River valley as



- having prime agricultural land and unique areas of high biodiversity value;
- The south of Joburg and Klip River valley is the historical “food basket” for Joburg and food security as a critical issue and can be addressed using this area;
 - There is a strategic opportunity for creating jobs and alleviating poverty through intensive agricultural development and related secondary and tertiary industries for agro-processing, packaging and logistics close to areas of high unemployment and poverty;
 - Modern organic based farming and agricultural technology and methodology will be used to optimise production yields and employment opportunities;
 - Opportunities will be created for a range of activities including community based small-scale farming, cooperatives through to intensive commercial agricultural operations providing collaboration and support particularly for SMME development;
 - Investment and development of agro-processing, manufacturing, packaging and transportation facilities can occur along major road and rail corridors for ease of distribution to local, national and international destinations;
 - Food security to address local communities needs will take place before wider distribution to local and export markets;
 - Easy access for unemployed communities provide opportunities for developing alternative transportation opportunities including promoting non-motorised transport;
 - The integration of tourism, including ecotourism and agritourism for local to international visitors and tourists will add a further dimension to local economic growth and development;
 - Social development including education and skills development must feature prominently in ensuring sustainable communities;
 - Opportunities exist for research and development in economic, social and environmental sectors and promoted through the establishment of an education and environmental resource centre at the Klipriviersberg Nature Reserve.

The primary focus is unlocking the potential economic and social value of the area through the unique environmental and biodiversity qualities.

Local and international funding and resource options have been identified. This includes major South African retail chains that are willing to participate and become involved. However, confirmation of the support of the City is important to secure funding and resources.

3. Rehabilitation and development of mine impacted areas

3.1. Smart City: Recognition and Participation of Key Stakeholders for Delivery

As noted in our submission last year, the EWDC has been identified for many years as a zone of opportunity for social and economic development that is highly accessible and centrally located particularly to areas of higher density, unemployment, poverty and deprivation. The mine-impacted areas under public and private ownership, offer a unique opportunity for the provision of appropriate economic development that would provide job opportunities close to where people are living. In addition, these areas form the backbone of the East West Public Transportation Management Areas identified in the Spatial Development Framework (SDF) of the IDP.

We also suggested that areas be identified which could be recognised as UDZs through which essential services infrastructure is provided and special rating zones created which will encourage economic development through public and private investment. This will ensure the establishment of decent employment through inclusive economic growth.

The City is reminded of the extensive investment through the JDA for the preparation and approval of the Nasrec Urban Development Framework that involved extensive participation and engagement with the landowners in the area.



As a major landowner, iProp would request recognition and inclusion in any planning and development processes being undertaken for the Gauteng Smart City.

In this regard, we recommended that the Nasrec Landowners Forum (NLOF) be resuscitated and reconstituted to include the major stakeholders in the area to focus on the efficient and effective delivery of the Smart City. In addition, the establishment of a UDZ to encourage and coordinate public and private investment in the area that will take advantage of the existing infrastructural development.

Your response to these recommendations is requested through the recognition of the NLOF as a stakeholder in the planning and development of the Gauteng Smart City and consideration of the area as a UDZ with potential for special rating.

An additional consideration, as a result of the development and establishment of the Gauteng Smart City, would be to ensure that the southern areas of the city receive improved IT connectivity in terms of fibre and wireless network expansion to attract business and investment and to promote educational, training and skills development.

3.2. AMD and Project Hloekisa: Release and Delivery and of Mine Impacted Land for Urban Development

iProp has for many years been supportive of the development of the East-West Development Corridor and looks forward to further engagement with the City in the review of the associated policy.

However, it should be recognised by the City that the reclamation, rehabilitation and redevelopment of mine-impacted areas through the removal of mine residues and development of these areas will contribute to addressing AMD.

We have been party to the conceptualisation of Project Hloekisa aimed at the removal of mine residues and through the central areas of Johannesburg. This project has also been incorporated into the Gauteng Department of Agricultural and Rural Development action plan for the future development of mine-impacted areas. In recent months ERGO has built a key component of the infrastructure for this project being a pipeline from the existing reclamation plant from central Johannesburg through to the ERGO facility in Boksburg costing approximately R400m.

From a financial feasibility and viability perspective, and to realise optimal removal of mine residues to release well-located land to the centre of Johannesburg for future mixed-use development a financial model has been suggested. This model requires securing a portion of all the property related transactions along the value chain of development, establishment, sale, rental and rates and services generated by from the land cleared through this project into a dedicated fund for management and maintenance of the final tailings deposition facility in perpetuity.

We would ask for an opportunity to engage with the City to investigate the development of this model including establishing potential implications for the Joburg Property Rating Policy.

Where the City is undertaking investigations and the preparation of strategies, policies and plans for the rehabilitation and development of mine-impacted areas, iProp, as a major landowner would request to be recognised and included as a key stakeholder and participant.

This includes the City investigations into converting acid mine water into good quality water supply.

4. Region F Interface Forum: Recognition and Establishment To Improve Service Delivery

In reviewing the Draft IDP it is apparent that the focus of policies, interventions and budget allocation is the Inner City (formerly Region 8). The areas outside the Inner City particularly to the south of the



city centre again are relatively ignored. This is despite agreements reached during processes of engagement and commitments that have been made by private business to inject further investment into the tourism and associated economic activities in these areas.

This includes developments and facilities such as Ormonde business and residential areas, Gold Reef City and Tsogo Sun, Turffontein, Thaba Ya Batswana, Panorama Flea Market, Expo Centre and Soccer City, Booyens Hotel, Lido Hotel, Wemmer Pan and Pioneer Park (despite continued problems relating to leases and administration by Propco) as well as the extensive investment by Soweto tourism and events related businesses. The City needs to be aware that business is quick to recognize the lack of commitment by the City to business efforts and will begin to reduce their investment commitment if it is apparent that business will be unable to realise the required returns from their investments.

As mentioned in our previous submission, initial meetings and discussions had taken place on a regional basis to establish a community based structure as an interface with the City Regional management. These discussions have progressed with the preparation and acceptance by MMC Ross Greeff of a letter of understanding for the establishment of the Region F Interface Forum on 22 August 2012.

The purpose of the Interface Forum is to realise the focused and effective delivery of services and facilities in all parts of Region F outside the Inner City. This will require the establishment of an action plan to improve engagement, increase resources, bend political will and improve commitment. The action plan is to be prepared through a consultative process involving councillors, officials, community, business and other stakeholder organisations.

It is requested that this intervention be recognised and incorporated into the strategies, outcomes and interventions of the appropriate priority implementation plan.

5. Nodal Development Focus: Establishment of a Network of Urban Management Nodes

In support of the Spatial Development Strategies, SOJO is embarking on a programme for the establishment of a network of urban management nodes. These will be based on City Improvement Districts and be located at various economic nodes through the southern areas.

The establishment of these nodes is also recognition of the importance and need for partnerships being established between the City, landowners and business to realise the upgrading and improvement of these key economic nodes.

Areas identified for the establishment of these urban management nodes include:

- Crown and Crown City
- Ormonde and Gold Reef City
- Turffontein, Pioneers Park and Rosettenville
- Booyens
- Klipriviersberg and Panorama
- Nasrec
- Southgate
- Rosherville Road
- Soweto
- Eikenhof

These nodes will be established in close collaboration with the City and we would request that suitable recognition and provision be made for their establishment over the next few years.



6. Urban Management: Stronger Compliance, Enforcement and Penalties

The number of urban management, compliance and enforcement related issues and their impacts on business and investment in the southern areas of Johannesburg is rapidly increasing. It would appear that measures to ensure compliance and enforcement of legislation including bylaws are particularly weak and ineffectual despite recent initiatives by the City.

By way of example, some of the major issues that have been identified include:

- Security problems due to traffic congestion and lack of traffic management and policing in Ormonde due to the poor condition and inadequate capacity of Crownwood Road the old bridge and in the Crown area involving Main Reef Road, M2 motorway, Press Avenue and Church street;
- Taxi behaviour and illegal road usage extensively through the area;
- Illegal buildings and land uses, including the establishment of 84 of scrap metal dealers in Booyens and surrounding areas, many churches and illegal residential occupations and vagrants through various areas undergoing urban decline and degradation;
- Vagrants and illegal occupation of land, illegal dumping, illegal discharges into stormwater drains and illegal water and electricity connections;
- Illegal mining activities.

The impact of these issues is resulting in increasingly rapid degradation of areas, infrastructure and services, loss of trading due to appearance and security risks, closing of legal businesses and loss of jobs, loss of property value, reduced rates revenues from areas.

We would strongly recommend that there is a major review of available infrastructure and resources with a view to providing increased, stronger and more effective compliance and enforcement.

In addition, we would again recommend that there is a radical increase in penalties and fines to impact substantially on those who are arrogantly defying the law and to adjust their behaviour and attitudes.

7. Greenway Project: Public Transport and Biodiversity Corridor along Klipriver Drive

KlipSA and SOJO in partnership with Thaba Ya Batswana, City Parks and Rand Water launched a 12km long corridor along the Klipriver Drive in October 2012 known as KUBiC (Klipriver Urban Biodiversity Corridor).

This is in support of the GDS2040 proposal for establishing "Greenways" for public transportation and is based on the existing dual carriageway. With the focus on establishing and developing BRT and public transportation along the route the intention is to also make the route more useable for non-motorised transport and pedestrians as an integrated transportation corridor. The corridor will link employment and residential areas along its length in support of the City Growth Management Strategy and SDF strategies to realise medium and long-term objectives relating to management systems, viable nodes, corridor development and strategic location densification.

The purpose of focusing on establishing a biodiversity corridor, in which extensive planting of local indigenous and other appropriate plants, is to create a unique experience entering and leaving Johannesburg along a major green corridor with the following elements:

- Environmental elements
 - establish self-sustaining attractive habitats adding to the diversity of vegetation habitats and biodiversity for a range of fauna and flora
 - improve the linkages between fragmented formal, informal and natural areas and open space areas
 - promote biodiversity in the mixed use developed urban areas
 - mitigate carbon emissions and air pollution
 - improve aesthetic qualities along the corridor and into surrounding urban areas



- Economic elements
 - improve the visual experience and impression of the south and along Kliprivier Drive
 - promote tourism and investment
 - improve property values and increase investment opportunities
 - improve accessibility experience into and out of the city from the south
 - reduce costs of maintenance and urban management along the road side
 - improve the environment for business to do its business
- Social elements
 - improve living conditions of those living next to Kliprivier Drive
 - improve working conditions of those working along Kliprivier Drive
 - provide direct and indirect job creation and employment opportunities
 - reduce social problems and costs
 - improve open space areas for active and passive recreation
 - strengthen civic identity and pride of communities

Implementation is occurring in close liaison and partnership with City departments and agencies led by Joburg City Parks. The project is expected to take 3 to 5 years to establish with a potential investment of R5 to 10 million. A suitable institutional structure is being established which will undertake extensive stakeholder engagement, identify and secure funding and resources, promote and market the initiative and undertake detailed design considering various aspects such as:

- removal of alien vegetation
- safety of road and sidewalk users
- needs and requirements of users of the road
- integrated public transportation and passenger needs and requirements
- needs and requirements of pedestrians and cyclists
- businesses and residential users along the corridor
- visibility and security issues
- advertising and signage
- services and infrastructure

As a key component of this project, it is requested that Klipriver Drive be recognised as a major road and BRT route with public transportation facilities supporting economic and social development nodes along its route and taking into consideration:

- existing industrial, commercial, retail and residential areas (including City housing and accommodation)
- the proposed development of a major commercial node incorporating the existing Panorama shopping centre and future proposed developments at Stone Rivers Arch (270,000 m² of mixed-uses including residential, offices, commercial, retail and ecotourism) and Aspen Ext 10 (65,000 m² retail and commercial uses)
- the extensive conference, tourism, sports and recreation facilities in the southern areas requiring access for broad range of local and international visitors and communities.

It is suggested that the public transport facilities required include expanding and extending the BRT and public transport facilities, providing designated taxi ranks, supporting the establishment of cycle tracks, walkways, urban furniture and artwork to add to the diversity and experience of travelling along the corridor.

8. Joburg's Developmental and Growth Agenda: Driven by Environmental Sustainability

As noted above in the GDS 2040, it is clearly stated that environmental sustainability should drive the City's developmental and growth agenda. It is therefore with some concern that the Draft IDP reflects a very limited view of the elements and components of the environment and lack of recognition of the priority of environmental sustainability.



This results in priorities, strategies and policies that are very limited and do not capture the wide range of environmental and biodiversity opportunities that the City could take advantage of in realising sustainable development in the short, medium and long-term. The nature and content of the environmental policies and proposals as contained in the Draft IDP are considered to be extremely narrow in a focus, reactive and lack substance, reflecting very little change on previous years.

The opportunity to look at proactive policies and strategies incorporating biodiversity stewardship, mitigating hierarchies and biodiversity offsets have not been recognised and should be incorporated in the IDP to avoid potential accusations of "greenwashing" and insincerity regarding the recognition of the importance of using environmental sustainability to drive development and growth in the city.

It is also suggested that the City consider considers the nature and content of management reporting and begins to move towards using globally and locally recognised integrated sustainability reporting frameworks as the basis for measurement, management and reporting. These frameworks can also be useful in establishing meaningful sustainable strategies and action plans.

With regard to investors and developers, integrated sustainability reporting is becoming a requirement for evaluating investment risk. In view of this, the preparation and production of such reports will be of value to the city in attracting, retaining and expanding investment as required in terms of one of the priority implementation plans.

If Joburg is serious about being a World Class African City it is suggested that internationally accepted global sustainability reporting will contribute substantially to achieving such recognition.

9. Brownfield Development: Supporting Sustainable Human Settlement

We would welcome the City recognising the importance of the regeneration of declining urban areas. In the southern areas there are many such areas and there is a need for the city to embark on a programme of rehabilitation and upgrading of existing urban areas that are currently experiencing rapid economic, social and environmental degradation and decline.

Examples of this can be found through various areas of the "old South" such as Rosettenville and Turffontein. These areas require a proactive and progressive commitment towards infrastructure investment and intensive urban redevelopment through densification and upgrading.

This will assist in the optimal use of limited budgets and avoid continual spatial segregation through urban peripheral development of subsidised housing, extension of infrastructure networks and adding areas requiring on-going management and maintenance in the future. Such initiatives will be supporting the realisation of the approved Spatial Development Framework and Growth Management Strategy.

Brownfield development will also be a proactive intervention of land management and environmental protection and avoid unnecessary impacts on the areas of biodiversity and ecological value identified in the Cities Regional Biodiversity Plan. A current example of this is the City's persistence in pursuing the development of Moffat Park and the consequential loss of open space and areas of biodiversity value. An initiative that is not in compliance and ignores many of the City's own approved policies and strategies of urban development and environmental protection.

In this regard, SOJO, in partnership with Wits University, has initiated a three-year student studio project to investigate, evaluate, analyse and prepare proposals for economic, social and environmental interventions. These should address issues such as street trading, social facilities, urban accommodation and services.



10. Sustainable Energy generation: Waste to Energy Generation

While the City and its agencies are embarking on initiating waste to energy projects, it should be noted that the current policies do not encourage and support investment in energy generation by private organisations and companies using waste as a resource.

iProp is currently investigating and investing in proven technology to use solid waste as fuel for the generation of electricity. In view of the excessive amounts and volumes of solid waste and electricity generation capacity challenges faced by the City it is recommended that the City embarks on a review of its policies regarding private energy generation to enable private investors and projects to be established either independently or in partnership with the City and its agencies. The energy generated through the process could be fed into the grid or designed to serve areas of the city as required.

COMMENTS AND SUGGESTIONS ON THE DRAFT IDP 2013/16

Section 4. Delivering on the Joburg 2040 Strategy

11. Table: Overview of GDS Roadmap

As noted above we support the City's ten priorities through the various proposals and initiatives of iProp, SOJO and KlipSA. In this regard we would request the inclusion and recognition of the following:

- Agriculture and Food Security
 - the inclusion of KEEDZ as a major urban agriculture hub as a deliverable
 - the establishment of an enabling environment for investment in urban agriculture, agro-processing, marketing and distribution of produce should be recognised as a deliverable
 - the inclusion of land owners as role players
- Sustainable Human Settlements
 - the inclusion of integrated transportation mobility corridors should be a deliverable
 - increasing investment in the provision of employment opportunities and job creation near existing areas with high unemployment and poverty should be recognised as a deliverable
 - "Partnerships with private sector" should be a deliverable
 - landowners, investors and developers should be explicitly recognised as a role players
 - community based organisations and NGOs should be recognised as role players
- SMME and entrepreneurial support
 - creating an enabling environment for attracting and retaining economic investment and development should be a deliverable
 - investors and developers should be included as role players
- Resource resilience
 - as stated in the GDS 2040: "Environmental sustainability is often viewed as an afterthought, but should, in essence, drive the City's developmental and growth agenda."
 - it is suggested that this GDS Roadmap component requires a review of the description of the overview and more radical and innovative deliverables
 - the content and message conveyed by the overview and the way it is couched suggests a more reactive as opposed to proactive consideration of natural resources
 - in other words, as it is currently stated, there really has not been a change in the



- recognition of the importance of environmental sustainability in the City's strategies and planning
 - a suggested deliverable could be the establishment and implementation of a biodiversity strategy, policy and action plan incorporating biodiversity offsets and the application of the mitigation hierarchy in economic and social development
 - clarification is required as to the deliverable relating to mine dumps as a natural resource and the relationship between supply side management and Acid Mine Drainage
 - we would recommend that the deliverables should include the protection, promotion and enhancement of natural resources
 - as has been suggested in previous submissions, ridges should be included as a natural resource with rivers and green spaces
 - clarification is required as to the "Department of Natural" as a role player
 - role players should include environmental and conservation organisations
- Smart City
 - differentiation between Joburg as a Smart City and the Gauteng Smart City project at Nasrec is required
 - the establishment of the Gauteng Smart City as a digital hub at Nasrec should be recognised as a deliverable
 - in this regard the relevant provincial departments should be recognised as the role players
 - investors and developers should also be recognised as role players in establishing infrastructure
- Investment attraction retention and expansion
 - clarification is required as to the meaning of "promote investment in corridors that are liveable"
 - "utilise high-value agricultural land in the South" should be expanded by adding "for sustainable economic and social development"
 - it is suggested that the deliverable should be the establishment of an enabling environment for investment and development of corridors and nodes
 - investors, landowners and developers should be recognised as role players
 - business and financial organisations should be recognised as role players
- Green economy
 - we would suggest that a deliverable could be the realisation of substantial sustainable economic and social development which protects promotes and enhances the value of natural assets and biodiversity
 - we would request clarification regarding the deliverable: "establishment of a large scale nursery farm on the mining belt"
- Safer cities
 - it is of great concern, particularly in view of the current safety and security environment, that this city priority severely lacks more substantive deliverables, no role players and an extremely generic iconic flagship project
 - it is strongly suggested that deliverables should relate to increased compliance and enforcement of national, provincial and local legislation and bylaws
 - a further deliverable should be a review and implementation of penalties to create a dissuading environment which encourages compliance and a change in behaviour

Section 5. Special Development Framework

12. SDF revision process 2013/14

- We note the City is currently involved in a process of revising the content and components of the SDF. We would request that iProp, SOJO and KlipSA are recognised as key role



- players as part of the public participation process
- We welcome the City's Regional Biodiversity Plan and look forward to participation in the preparation of strategies, policies and action plans relating to the protection, promotion and enhancement of the value of the biodiversity
- We note the establishment of working groups addressing certain policy approaches and request an opportunity to engage with these working groups as soon as possible
 - this is required to provide input and support particularly with regard to the mine impacted areas of the East-West Development Corridor and integration of the development approach encompassed by KEEDZ
- Desired outcomes through the application of SDF principles
 - We would suggest the inclusion of addressing urban degradation and decline as an outcome which could be achieved through upgrading, rehabilitation and reinvestment in existing urban areas (Brownfield development promotion)
 - the outcomes and implementation should also consider promoting and supporting investment and development in areas offering employment and job creation opportunities close to areas of unemployment and poverty - bringing jobs to where people already live
- Current SDF strategies
 - Strategy 3: Ridges should be included as an environmental feature
 - Strategy 4: clarification is required as to why only "two" development corridors have been identified
- Figure: Consolidated Spatial Development Framework
 - the legend for the figure does not include the Areas Beyond the Urban Development Boundary

Section 6. Getting the basics right

- Service Delivery Charter
 - It is suggested that the Service Delivery Charter should be expanded to include professional and "soft" services such as those relating to development, planning and building approvals including engineering services permissions and approvals, valuation and revenue services, health, libraries and other social facilities

Section 7. 2013/16 Priority Implementation Plans

- General observation
 - in reviewing the 2013/16 priority implementation plans in this Section there are instances where the continuity and alignment between the content of the earlier Section 4 GDS Roadmap Priority Implementation Plans require careful examination
- Agriculture and food security
 - we would request the recognition of KEEDZ as an initiative through which the priorities, interventions and outcomes can be realised
 - in this regard, we would request an opportunity to interact with the Technical Task Team which has been established
- Sustainable Human Settlements
 - we would request the Klip River Drive and the associated KUBiC intervention be recognised as a component which will support spatial transformation and the realisation of the outcomes of this priority
- Engaged Active Citizenry
 - we would request that the Interface project established for the areas outside the Inner City in Region F is recognised as a project particularly as it has been endorsed by MMC Greeff



- Resource Resilience
 - Table: Overview of interventions and required outcome
 - it is suggested that the overview for Projects 1 and 2 needs to be aligned with the problem statements and required outcomes
 - Project 1: prevention of sewage discharges should be included as a required outcome to improve water quality
 - Project 3: a proposed outcome should be the approval of a biodiversity strategy, policy and action plan incorporating biodiversity offsets and the application of the mitigation hierarchy in economic and social development
 - Project 3: the problem statement should include ridges as part of the ecosystems
 - Project 4 : it is suggested that the overview, problem statement and required outcomes be separated into two separate projects relating to mining activities and energy mix
 - Project 5: a required outcome could be the implementation of waste to energy projects
 - Table: resource resilience priority implementation plan
 - Air quality and climate change: participation in the Mining Land Dust Monitoring Forum should be identified as a project/intervention
 - Urban Water Management: projects/interventions should include increased penalties and implementation of compliance and enforcement
 - the promotion of the use of "grey water" should be included as a project/intervention
 - Biodiversity protection: it is suggested that the key performance indicator metric should be in hectares or as a percentage of the metropolitan area to be aligned with provincial objectives
 - Project/intervention should include the growth of an expansion of existing protected areas, such as the Klipriviersberg Nature Reserve
 - Waste management and minimisation and Shift to Low Carbon Economy: Private sector investment and development of waste to energy initiatives should be encouraged through appropriate policy frameworks
- Smart City
 - Table: Smart City Priority Implementation Plan
 - while the Gauteng Smart City/Techno Hub is recognised as an initiative in the preamble to the table there is no mention of this project in the Implementation Plan. It is suggested that this should be recognised as a separate IDP programme in the Implementation Plan
 - in view of the investment and role of the JDA in the preparation and approval of the Nasrec Urban Development Framework, we suggest that the institutional structure led by the JDA relating to that project including the Nasrec Land Owners Forum, be re-initiated to ensure participation of major stakeholders in the node development
- Investment attraction, retention and expansion
 - it is suggested that the only aspect of this priority that is addressed relates to attraction through the hosting of annual BSIV conference
 - it is our contention that the City needs to take a serious look at how to retain and expand investment
 - the priority implementation plan is considered to be woefully lacking in any initiatives to ensure investment in the city is retained and expanded
 - by way of example, a critical review and plan of action is required regarding the delivery of land for investment and development, securing on-going sustainable development and expansion by local and international investors and improving the competitiveness of the City and its services investment and maintenance
 - business and investor representatives are constantly raising concerns regarding priority projects and budgets, unfunded priorities technical and capacity challenges



- for delivery and issues surrounding costs, rates and tariffs affecting business
- these should form priority programs for investigation and preparing suitable plans of action to improve the efficiency and effectiveness of the city in serving the needs of existing investors and business to ensure their retention and expansion
- **Green Economy**
 - clarification is required as to the projects involving the City investing in green business and industries
 - it is suggested that the City should be focusing on providing an enabling environment for current and future business investment in green infrastructure, operations and management
 - this could include policy frameworks, incentives and support for industries and business to adopt sustainable investment and practices
 - in addressing the implementation of this priority plan the role of private sector, business and industrial associations, CBO's and NGOs is critical
 - the role of citizens as consumers of the products of the economy, including the City's services, should also be highlighted and incorporated into the implementation plan
- **Safer Cities**
 - as noted earlier, this aspect of the City's Identified Priorities is severely lacking in addressing compliance and enforcement and the effectiveness of policing and penalties evidenced by the rising rate of urban decline through illegal uses, illegal dumping, illegal buildings and the many other contributors to a breakdown of urban environment and infrastructure
 - it is critical that the components of the implementation plan detail suitable metrics to be able to measure the effectiveness and performance targets
 - programs and measures regarding improved public safety and urban management should be implemented much sooner than three years to avoid further degradation and decline of areas, increasing loss of investment and declining property values

Section 8. Intergovernmental Planning and Partnerships

- In reviewing this component of the Draft IDP it became apparent that many of the comments noted earlier are also relevant to the section and will not be repeated.
- However, it is requested that the ideas and issues raised earlier be considered and incorporated where appropriate, particularly regarding the listed 12 National Outcomes of government

Section 9. 2012/16 Community Based Planning and Stakeholder consultation

- **Community Based Planning**
 - the involvement of the community through effective participation in the City's planning processes is welcomed
 - however, while it is recognised that businessmen are also residents and citizens in their own right, it is suggested that the collective needs of investors, developers, industrialist and the business community are also incorporated in a more structured outreach process
 - the City also needs to ensure that the processes of engagement are meaningful and that the needs and priorities of residential and economic communities should be expected and reflected in the plans and budgets of the City.
 - furthermore, the delivery of these needs and priorities must be realised to build trust and accountability between the City and its citizens.
 - failure of delivery needs to be measured and accountability must be identified to ensure that residential and business citizens build a greater confidence in the City and its leadership



Section 10. Medium Term Budget

- Review of previous years plans and budgets
 - need to see and understand what has been achieved and realised through capital and operational expenditure arising from previous IDPs and budgets
 - measurement of levels of success in addressing key issues and project implementation should be provided to be able to assess efficiency and effectiveness of expenditure
 - R110 bn capital investment
 - does the City have the capacity to spend this amount of money efficiently and effectively?
 - need for partnerships with business and communities to secure skills and resources for delivery
 - need for enabling environment, recognising legal context and requirements,
- Budget Process
 - while the benefits of zero-based budgeting are recognised it is of some concern that there is no opportunity to review the efficiencies and effectiveness of the budgets and expenditure of the previous period
 - particularly as the budget review process commences approximately 6 months into the financial year.
 - it is suggested that the budget process should include evaluation and analysis of delivery in the previous period
- Tariffs
 - the City should acknowledge the importance of recognising environmental benefits, costs and impacts as a principal for setting tariffs
 - this should address the protection promotion and enhancement of the value of the biodiversity and environmental qualities of the city
 - in terms of local and international reporting standards this should be a fundamental component of the City's budget preparation, management, measurement and reporting

Section 11. 2013/14 Capital Investment Framework

- A growing concern of residents and businesses in the southern areas of Johannesburg is the ageing infrastructure and the impacts of the deterioration, breakages and general wear and tear is having on living standards and business operations.
- Greater consideration needs to be given to the management and maintenance of the existing infrastructure to prevent areas degrading and declining.
- The opportunities for increasing capital investment in upgrading, rehabilitating and redeveloping "Brownfield" areas needs to be assessed and evaluated to support the Growth Management Strategy.
- Greater consultation and participation of investors and developers in the city should be promoted to guide the identification of service capacity backlogs for critical capital interventions that will also promote city growth and development and attract investment. Examples of this include the upgrading and construction of Crownwood road and the replacement of the existing bridge.
- It is of great concern to SOJO and other business associations that Joburg Tourism role in coordinating and promoting tourism in the City appears to be reducing in importance.