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**To: The Executive Director: Transport
City of Johannesburg
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**Date: 18 June 2013
Our Ref.: IPR003-ITP-01
Pages: 1 of 10**

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Dear Ms Seftel

**CITY OF JOHANNESBURG: STRATEGIC INTEGRATED TRANSPORT PLAN
FRAMEWORK 2013**

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 Strategic Integrated Transport Plan Framework for the City of Johannesburg (SITP Framework). Following the consultation session for the Johannesburg Business Forum held on Tuesday 18 June 2013, we wish to make the following submission.

The submission will include general comments, observations and proposals followed by more detailed review of the draft document made available for comment.

1. Gauteng City Region Context

While the focus of the Framework is on integrated transport systems for the City we would suggest that greater cognizance and consideration be taken of the context within which Joburg exists. The surrounding municipalities and their transportation networks and associated destinations and origins as well as the national and provincial road networks should be taken into greater consideration particularly in terms of long-term transportation and spatial development and planning.



Most of the plans and proposals do not go beyond the boundaries of the City and recognise the interdependence of the surrounding areas for economic and social development and the movement of people and goods freely across administrative municipal boundaries within the Gauteng City Region.

The national and provincial road networks should be incorporated into the future planning of the City's transportation systems. This should also include securing routes for future roads that will have medium to long-term consequences on the City's infrastructure. An example is the N17 and the need to secure land for the future development of the link between Wemmer Pan and Nasrec. While we recognise that this is not a municipal road it is critical that the City secures the land as an investment in its future transportation network.

2. Rehabilitation and development of mine impacted areas

The East-West Development Corridor (EWDC) has been identified for many years as an important zone of opportunity for social and economic development contributing to the spatial transformation of the city, its restructuring and integration. The corridor 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.

The EWDC is largely serviced by the heavy railway network for passengers and freight with various elements and components of the public transport and road networks passing through the area. In assessing the need for the movement of people and goods it will be important that the potential economic and social opportunities of areas of this corridor be considered in the future integrated transportation network assessments. As an area identified largely for economic growth and development the improved mobility of goods and services through this area needs to be recognised. From an economic point of view the City Deep area and associated freight mobility is of particular importance and its contribution to the national Strategic Infrastructure Project (SIP2).

We have suggested to the City in the recent IDP review that areas in the EWDC be identified as Urban Development Zones and Special Rating Areas through which essential services infrastructure, including integrated transportation, is provided and special rating zones created which will encourage economic development through public and private investment.

This would include the Nasrec area with the approved Nasrec Urban Development Framework and identified by the Gauteng Premier as a Smart City.

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

The Klipriviersberg Economic and Ecosystem Development Zone (KEEDZ), recognised by the City in the GDS 2040 and subsequent IDP reviews, is an opportunity 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. This will involve the establishment of an extensive urban agricultural hub integrated with tourism and their associated value chains to stimulate economic and social development with a view to protecting promoting and enhancing the value of the biodiversity of the area.

The establishment of the Agritropolis will support the recognition and promotion of



environmental, economic, social, transportation and spatial linkages between the municipal areas of the Gauteng City Region. In addition, this intervention will assist in restructuring and integrating the City, improve accessibility to many people living in the south to economic opportunities and encourage the use of alternative transportation modes.

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.

In view of the unique natural environment in the southern areas and in recognition of the many varied leisure, sporting and recreational activities the City accepted tourism as an economic driver in the area of the SOJO Development Loop incorporated into the Spatial Development Framework (2007). The integration of international, regional and local tourism, including conferencing, sports and recreation into the agricultural activities will open many additional opportunities for economic growth and development.

Integrated transportation facilities and services will also be required for motorised and non-motorised transport. The area is particularly important for recreational walking and cycling promoting a healthy lifestyle and alternative means of transportation for visiting different areas. It is important that suitable services and facilities be provided to promote these activities such as cycle lanes and pedestrian paths.

The development of this initiative will have many opportunities and implications on the integrated transportation systems for the movement of people, goods and services and will need to be accommodated in future components of the Comprehensive Integrated Transport Plan.

4. Recognition of southern and south-eastern areas of the City

In most of the planning and proposals there is little or no recognition of the need to provide transportation networks and facilities to the southern and south-eastern areas of the City. Most of the proposals obviously need to focus on the improving the accessibility of the south-western



communities to economic and social opportunities. However, there are existing and future communities and economic opportunities in the southern and south-eastern areas which are also requiring improved transportation facilities.

In this regard, we wish to note the importance of Klipriver Drive as an important transportation corridor from the Booyens area through mixed employment and residential areas and nodes to the Panorama node and beyond linking onto the R59 and ultimately into Tokosa. Not only is this required for the movement of people, goods and services on a daily basis but it is also an opportunity to promote economic growth and development through tourism.

The provision of improved public transportation services and facilities in the southern and south-eastern areas such as Turffontein and Rosettenville will also encourage "Brownfield" redevelopment and rehabilitation of areas currently experiencing rapid urban degeneration and decline. These areas can also be used to avoid new "greenfield" developments in peripheral areas by densifying and intensifying development in existing urban areas with upgrading and improving basic essential and social infrastructure services.

The future scenarios for the BRT should allow for facilities and services into the south-eastern parts of the City and to link into areas and such as Alberton, Germiston, Katlehong and Tokosa and their associated public transportation services.

Similarly, the Transport-Orientated Development (TOD) network and nodes should be extended through to the south-eastern areas to include nodes such as Southgate, Mondeor, The Glen, Panorama and the linkages between them.

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

In support of the City's 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 mixed-use economic nodes through the southern and south-eastern areas.

The establishment of these nodes is also recognition of the importance and need for partnerships to be established between the City, landowners and business to realise the upgrading and improvement of these key economic nodes. These nodes will provide ideal opportunities for supporting integrated public transportation systems using various modes of motorised and non-motorised transport and promote mixed-use higher density commercial, retail and residential development.

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 and for their inclusion in the TOD precincts and corridor networks.



This should include the upgrading of an existing transportation services and facilities for public transportation and non-motorised modes and promoting the growth and development of new services to support the extension of the transportation networks and corridors.

6. 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 that support and resources to be allocated for the establishment this Greenway for developing integrated public transport and the establishment of a biodiversity corridor. We would suggest that the corridor could also be considered as a "Freedom Corridor".

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

7. Sustainable transportation priority

While mention is made of environmental and green considerations in a few of the aspects and interventions of the Framework, a surprising and disappointing omission is a specific Thrust, Strategies and Programmes to address sustainability and environmental management. It would be expected that the City would strive to address these issues as a priority in establishing itself as a world-class city.

If the City is serious about environmental sustainability driving the developmental and growth agenda, as stated in the GDS2040, 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.

It should be recognised that this is a cross-cutting strategy affecting each of the different aspects of the integrated transportation framework and therefore should require a specific Thrust for implementation, measurement and management. Such an approach is currently international best practice and key to establishing suitable transportation metrics and indicators for reporting.

It is recognised that the introduction to the final section regarding outcomes, outputs and indicators does make mention of the need for appropriate sustainability indicators. However in reviewing the outputs and indicators it is difficult to identify how the environmental impacts are measured, how they are to be mitigated and where appropriate suitable biodiversity and environmental off-sets established.



The outcomes and indicators indicate important measures of delivery but lack measures of impacts and sustainability. For example mention is made of the number of bursaries awarded not the number of degrees or qualifications attained so while the quantity may be expressed the quality is lacking.

8. Law enforcement

The number of urban, traffic and transportation 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.

Mention is made at various points through the Framework regarding law-enforcement. However, with increasingly widespread and more frequent urban and traffic management and violation problems we request the City to further increase resources and infrastructure to strengthen enforcement and compliance with far greater and more radical and effective increases in penalties for infringement of laws and regulations.

9. Comments on the Transport Thrusts, Strategies and Programmes and sections of the framework

Thrust No 1: Restructure and integrate the city

- The promotion of economic and social development through agriculture and tourism in the southern areas of the city will contribute to bringing more local economic development opportunities, job opportunities and address food security close to where people live with an effect of reducing travel times and dependency on transportation networks and systems.
- Promoting "Brownfield" re-development in older residential areas such as Turffontein and Rosettenville will support restructuring and integration of the city and optimise use of existing infrastructure without needing additional "greenfield" development in peripheral areas.
- The recognition of the proposed SOJO city management areas and interventions such as KUBiC will support the establishment of TOD nodes and corridors.

Thrust No 2: Improve and expand provision of quality public transport and use of non-motorised transport

- Apart from physical and spatial changes, the City requires major interventions regarding education and awareness to realise a change in behaviour and greater use of alternative transportation modes.
- Associated with this must be resolving conflict between modes of transport and security issues to support the increase of pedestrians and cyclists.
- Existing facilities and services in the south and south-eastern areas need to be provided, improved and upgraded to encourage greater use of public transport by existing communities.
- Improved accessibility to public transportation facilities and services will encourage reinvestment, rehabilitation and upgrading of declining urban areas as these areas are close to employment and social opportunities.

Thrust No 3: Maintain, improve, extend and integrated transport infrastructure

- Where appropriate the main elements of public transport and non-motorised transport infrastructure, including "complete streets" can be incorporated into the SOJO urban management areas and along the linking corridors.



- The reservation of land required for future facilities and services should be identified as soon as possible for long-term planning and development.
- In establishing the network of pedestrians and cycling routes the opportunities for tourism and recreation related facilities should also be taken into account to enable the expansion and extension of the network into additional areas.
- The general road network and stormwater programs should include securing of land required for future roads and stormwater infrastructure.
- The securing of land should not be limited to municipal requirements but should also take into account long-term strategic acquisition for provincial and national facilities. An example being the N17 link between Wemmer Pan and Nasrec, which is not recognised by national authorities as a priority. However if that link is lost it will have a major impact on future Joburg road networks.
- Activities noted in Table 19 (the numbering of the Tables in the text needs to be checked) regarding roads infrastructure should also include providing enabling and supportive services for investors and developers to establish new infrastructure. Currently inordinate and expensive delays and complications arise in attempting to establish new areas of development and infrastructure in the City.
- The proposal to introduce a new approach to Developer Contributions is noted and we would request investors, developers and property owners be consulted at an early stage in the development of this new approach.
- The contents of Table 21: Road hierarchy project 2009: priority road projects for 2015 is noted with the following comments:
 - the eastern extension of Rand Show Road to Dorado Avenue should only be undertaken as and when the upgrading of other roads into and out of the Ormonde area has been undertaken as previously noted when this project was being assessed a number of years ago;
 - project ranked 5 is inadequately described;
 - we would request early consultation and involvement in the N17-Crownwood Road to Nasrec Road project;
 - we note that the upgrading of Crownwood Road is not included despite the road being a municipal priority.
- The contents of Table 22: Road hierarchy project 2009: priority road projects for 2020 is noted with the following comments:
 - the project for the Extension of the M2 Highway should be a higher priority in view of the major cost and time delays caused by the totally inadequate intersection of the M2 with Main Reef Road. We would request an opportunity to discuss proposals and ideas, including funding and financing opportunities, regarding this project;
 - we note that no mention is made of the extension of Golden Highway from Nasrec to Main Reef Road and we suggest that the construction of this project should be programmed.

Thrust No 4: Supporting economic growth through improving freight mobility

- Despite the recognition of the importance of mobility to move freight, we would suggest that the inadequate information and lack of substantive strategic proposals for this very important aspect of this transport framework is of great concern.
- The lack of information and therefore inadequate analysis and understanding of the importance of freight movement in the Johannesburg and central Gauteng economy needs to be seriously reviewed before the document is finalised.
- The importance of the City Deep area in supporting national logistics strategies as contained in SIP2 needs to be stressed and detailed.
- iProp has for many years been promoting the establishment of a road link to the Rand airport to provide air freight as an option for City Deep infrastructure and services;
- The approach taken focuses on an analysis which only identifies negative social and economic impacts pollution, poor statistical data, negative effects of loading externality costs and law enforcement problems resulting in un-informed strategies.



- It is our contention that the strategies for freight and logistics in Johannesburg require a complete review due to their inadequacy towards supporting economic growth by improving freight mobility.
- It is not possible to comment on the details of the proposed freight network shown in Figure 15 as the quality of the graphic is extremely poor and unreadable.
- Mention is made of the creation of a Freight Quality Partnership (FQP) - has any investigation or research been undertaken regarding existing structures and forums regarding freight transport in the city?
- The longer term strategies that are mentioned provide no detail and it is therefore impossible to comment or assess these proposals.

Thrust No 5: Manage congestion, travel demand and parking

- The comments regarding the reality of traffic congestion being "quite severe and mobility is quite compromised" provides no understanding of the magnitude of the problem relating to the time and costs of delays caused by congestion.
- The plan shown on Figure 16 shows no date as to whether it is before or after the Gauteng Freeway Improvement Project (GFIP) or whether the peak period is morning or evening. It is also interesting to note that there is no congestion shown on the N1 between Beyers Naude and Rivonia which is known to be highly trafficked and congested section of freeway;
- In assessing the future road network inclusion of the provincial and national roads and their extensions should be shown.
- While it is recognised that the focus of the City strategy is to promote public transportation, these facilities and networks also require roads and the City approach to not build more roads may be short-sighted.
- The impact of increased public transport on existing roads is recognised as a strategy to force more people to use public transport services. It therefore becomes of critical importance that these public transport services are actually provided and further delays, politicking and non-delivery as has been experienced over the last 10 years avoided at all costs.
- The strategies and approaches focus on pushing car users into public transport. At the same time it is of vital importance that the public transport services "attract" users through their efficiency and effectiveness which is currently not provided.
- The SOJO urban management areas will incorporate opportunities for addressing Travel Demand Management and provide services and facilities to support local accessibility and movement including NMT and alternative transport methods.

Thrust No 6: Actively engaged citizenry in improving the transport system

- Engaging stakeholders will be a critical component of achieving success of the proposed strategies. It is important that the engagement is meaningful and that the appropriate interest groups and stakeholders are approached and engaged as soon as possible rather than at the end of the preparation of strategies, policies and project design processes.
- Mention is made of different structures that have been established to engage residents and stakeholders and the only details that are given are for the Street Alive program components and projects. It is suggested that the strategy should set out in detail the different structures and stakeholders that will be used in developing, promoting and implementing the strategies.
- This is a "crosscutting" strategy and perhaps each of the Thrusts should contain details of how active engagement of citizenry will be undertaken.
- While this strategy focuses on engaging citizens we would suggest that inter and intra government structures should also be identified to ensure co-operation and coordination between the City and appropriate national and provincial departments and agencies.



Thrust No 8: Plan the transport system

- Despite the admission that there is a lack of information and data regarding freight transport in the City the data sets, surveys and systems to be maintained and updated make no mention of freight data and the components of the Integrated Transport Plan also makes no mention of freight.
- It is suggested that the second stage of the planning process should ensure collection and analysis of freight movement and the following components include specific and explicit proposals regarding freight.

Thrust No 9 Resource and finance the transport plan

- The context includes a detailed breakdown of the staff within the Department while the strategies provide very broad and generic proposals. It would be hoped that more details regarding human resource requirements would be provided to ensure adequate skills and staffing for implementation of each of the Thrusts and related strategies.
- The context identifies many challenges and yet the strategies provide no response to these challenges or the identification of opportunities which can be used.
- Without understanding and developing appropriate human resource strategies the implementation of the framework is at risk and once again with a high possibility of non-delivery.
- The recognition of knowledge and expertise in the different fields of transportation should also be harnessed and not only focus on the development of "transport activists". This relates to the active citizenry of the previous strategy and the need for stakeholder engagement and participation to support the Department in realising strategies.
- Similar comments, concerns and associated risks apply to the section on revenue sources and funding.
- As noted above, we would request that we be included in the review and development of a new formula for developer contributions from the outset of this process.

Transport outputs and outcomes

As noted earlier regarding the metrics and indicators, these are considered to be inadequate to provide appropriate information to assess sustainability within the various Thrusts, Strategies and Programs. If there are

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

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