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To: **The Executive Mayor**
City of Johannesburg
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Date: **30 April 2014**
Our Ref.: **IPR003-IDP14-03**
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Attention: **Mr Tshimangadzo Mundalamo**
Email: **tshimangadzom@joburg.org.za**
And **Ms Lennette Fouche**
Email: **Lennettef@joburg.org.za**

Dear Sir

**CITY OF JOHANNESBURG: 2012/16 INTEGRATED DEVELOPMENT PLAN:
2014/15 REVIEW**

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 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 wish to thank you for the opportunity to participate and be involved in the development and preparation of the Joburg Integrated Development Plan 2014/16 (IDP) through the Community Based Planning Process (CBP). Following the initial public meeting held on 25 November 2013 we have been actively engaging with the office of the Executive Mayor Cllr Parks Tau, to whom we presented on 26 November 2013, and the office of Councillor Roslynn Greeff resulting in a meeting with her and senior officials of Johannesburg Council on Tuesday, 18 March 2014. Arising from this presentation and the subsequent meeting 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.

We also wish to generally support the principles of the CBP approach that has been established to take cognizance of the particular requirements of local communities, support meaningful participation of active citizens, encourage private initiatives and proactively build on the strengths and opportunities of areas. We would submit that this contribution is in line with realising the outcomes desired from the CBP approach to address appropriate social and economic development driven by environmental and biodiversity value through active citizenry.

In addition, through proactive initiatives of the above listed organisations we would welcome the opportunity to enter into a suitable partnerships with the City to realise the delivery of the different initiatives and programmes that have been identified.

The key points of these initiatives and programmes are set out below with the detailed motivations provided in Annexure A attached:

The submission will initially contain general comments regarding the Draft IDP 2014/15 Review particularly about following through on previous submissions, updating on projects and initiatives and making proposals for consideration and inclusion. This is followed by more detailed comments and suggestions on various components of the Draft IDP.

1. Initiation of Collaboration: Support for Building Partnerships

- 1.1. An outcome from the meeting with the Executive Mayor on 26 November 2013 was the establishment of a task team of Members of the Mayoral Committee and senior officials under the leadership of Cllr Roslynn Greeff to identify and initiate projects. At the meeting held on 18 March 2014 the activities for the following were initiated:
 - The proposals for the establishment of the Agritropolis and associated initiatives and programmes should be aligned with the City's Spatial Development Framework;
 - The proposals for the establishment and development of an intensive urban agriculture in the area should align with the City's Food Resilience Framework;
 - The proposals for the protection, promotion and enhancement of the value of the natural environment and biodiversity should align with the City's Bio Regional Plan and associated conservation initiatives;
 - The initiative for establishing a formal interface between the City and community organisations to address service delivery issues in Region F should be implemented.
- 1.2. Subsequent to the above-mentioned meetings, we established that a report had served before Council on 31 October 2013 regarding an update on the Southern Farms Project involving the City's approximately 1540 ha of land in the Klipriviersberg area. The recommendations contained in the report by Joburg Property Company are to initiate a detailed and comprehensive environmental sensitivity analysis of the area to provide a plan for the preservation and sustainability of the natural area. In addition, land for future development and the required infrastructure will also be identified.
- 1.3. 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). We would suggest that the approval and implementation of the



recommendations contained in this report is in accordance with this new development approach of the City.

- 1.4. We therefore acknowledge and welcome this Council report and look forward to these initiatives being implemented. We confirm our willingness to participate actively in their realisation and the preparation of a suitable urban development framework for the area that will protect, promote and enhance the value of the biodiversity and environmental assets.

2. Previous Submissions: Recognition and Inclusion of Major Development Initiatives

- 2.1. We request that this and previous submissions to the GDS2040 and IDPs 21012/16 and 2013/16, which were acknowledged and referenced for incorporation into City economic and spatial development policies are explicitly taken into account in the respective programs of the City.
- 2.2. Previous submissions have also made numerous detailed comments and suggestions regarding the content of the IDP which we would request be included to add value to the economic, social and environmental development and sustainability of the City.
- 2.3. 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.
- 2.4. 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 (EWDC), now identified as a Corridor of Freedom, and initially for the Gauteng Smart City at Nasrec.

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

- 3.1. 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 the associated value chains.
- 3.2. We believe that the City should pursue the concept of establishing an Agritropolis as an agriculturally based urban hub in this region for the benefit of the poor and unemployed communities resident in the southern areas of Gauteng.

4. Rehabilitation and development of mine impacted areas

- 4.1. Smart City: Recognition and Participation of Key Stakeholders for Delivery
The Nasrec Landowners Forum should be resuscitated by the City to ensure efficient and effective delivery of the Gauteng Smart City at Nasrec through a structured participation of key stakeholders.
- 4.2. AMD and Project Hloekisa: Release and Delivery of Mine Impacted Land for Urban Development
With extended understanding, experience 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.

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

- 5.1. Following acceptance of the strategic framework for the establishment of the Region F Interface Forum by MMC Ross Greeff in 2012, we request the support and resources to be



allocated for proceeding with this intervention to ensure focused and effective delivery of services and facilities.

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

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

7. Urban Management: Stronger Compliance, Enforcement and Penalties

- 7.1. 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.

8. Greening Project: Public Transport and Biodiversity Corridor along Klipriver Drive

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

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

- 9.1. 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.

10. Brownfield Development: Supporting Sustainable Human Settlement

- 10.1. 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.

11. Sustainable Energy generation: Waste to Energy Generation

- 11.1. 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.

12. Comments on the Draft 2014/15 Review

- 12.1. It should be noted that these comments are referenced in terms of the pages and components of the Draft IDP document as made available for public review and comment.

PAGES	IDP COMPONENT	COMMENT
21-32	Governance and institutional framework	<ol style="list-style-type: none"> 1. As part of the Institutional Review Joburg Tourism Company was capsized into Group Communications. It is our contention that this decision must be carefully reviewed and reconsidered as it has minimized the importance of tourism as an important economic sector in Joburg. 2. The City is pursuing and promoting active citizenry



PAGES	IDP COMPONENT	COMMENT
		<p>and partnerships recognising the importance of the collaboration and sharing of resources.</p> <p>3. In this regard it is suggested that part of the institutional framework, that the City explicitly recognises and includes structures such as the Johannesburg Business Forum and its associated subcommittees.</p> <p>4. Other similar structures interacting with business, labour and community structures and organisations should also be given recognition and incorporated as part of the institutional framework, either generally or with a particular focus, purpose or project to address.</p> <p>5. Formal recognition and promotion of such structures will add credibility and legitimacy to the internal and external stakeholders' and participants' participation and involvement in the economic, social and environmental development of the City.</p>
33-43	Delivering on Joburg 2040 Strategy	<p>6. iProp's project to generate energy from waste is an example of a private sector co-partner in the generation of energy for the City.</p> <p>7. Initiatives by SOJO and KlipSA towards promotion of waste management including separation and recycling are examples where business and community organisations are willing to work with the City.</p> <p>8. The KEEDZ development approach and associated Agritropolis proposal and other initiatives for the southern areas of Johannesburg should feature as a key component of an integrated spatial plans for the city in 2040.</p> <p>9. "Green Infrastructure" should be a foundation for development in the Klipriviersberg region of the city where the development initiatives are being led by the protection, promotion and enhancement of the biodiversity and natural environmental assets.</p>
44-59	GDS Roadmap Annexure	
45	OUTCOME 1: IMPROVED QUALITY OF LIFE AND DEVELOPMENT-DRIVEN RESILIENCE FOR ALL <ul style="list-style-type: none"> • OUTPUT 1: Reduce poverty and dependency • OUTPUT 2: Food security that is both improved and safeguarded (PRIORITY) 	<p>10. The desired Outcome and associated Outputs regarding poverty and food security would be a key driver for the establishment of KEEDZ and the proposed agritropolis.</p> <p>11. The detailed investigations being initiated by JPC should form the basis for identifying suitable areas for agricultural and related development and infrastructure in the Southern Farms.</p> <p>12. In addition, the establishment and development of an intensive urban agriculture in the area should align with the City's Food Resilience Framework and contribute towards the realisation of many of the deliverables identified.</p> <p>13. Furthermore the integration of the tourism sector into the agricultural economic value chain will bring further opportunities for addressing poverty and unemployment share – particularly for the poor communities located in the southern areas of the City.</p>



PAGES	IDP COMPONENT	COMMENT
49	OUTCOME 2: PROVIDE A RESILIENT, LIVEABLE, SUSTAINABLE URBAN ENVIRONMENT – UNDERPINNED BY INFRASTRUCTURE SUPPORTIVE OF A LOW-CARBON ECONOMY <ul style="list-style-type: none"> • OUTPUT 1: Sustainable and integrated delivery of water, sanitation, energy and waste 	<p>14. SOJO has initiated waste related initiatives with the City to address waste management and recycling and will continue to pursue these initiatives.</p> <p>15. iProp's initiative to generate energy from waste at the Robinson landfill site is advanced and will contribute to alternative energy generation and the management and reduction of waste disposal.</p> <p>16. Further investigations into the establishment of alternative energy generation opportunities through solar, wind and water technology is also being investigated by iProp in industrial and commercial township developments and mine impacted areas.</p> <p>17. KlipSA's Sustainable Development Team is proactively engaging with investors and developers in the Klipriviersberg region. The purpose of this is to endeavour to promote the targets for the outcomes and deliverables regarding waste, water, sanitation and energy management and reduction.</p> <p>18. Information sharing through SOJO and KlipSA programs and projects such as the Green Business Platform and Sustainable Urban Living presentations and talks will improve the understanding of business and residential communities and stimulate behavioural change and awareness regarding waste, water, sanitation and energy management.</p>
50	<ul style="list-style-type: none"> • OUTPUT 2: Eco-mobility 	<p>19. The Klipriviersberg Biodiversity Corridor (KUBiC) project initiated by SOJO, KlipSA and their partners incorporates proposals for improved integrated public transportation and non-motorised transport services, facilities and infrastructure along its 13 km length.</p> <p>20. This is to link economic and residential nodes and promote urban restructuring through densification and upgrading of associated neighbouring urban areas.</p> <p>21. Where appropriate it is the intention to incorporate the Complete Streets and Greenways initiatives of the City.</p> <p>22. The Klipriviersberg region has many facilities and areas for walking, cycling and other recreational activities which are a basis for promoting tourism and associated economic growth and development.</p>
51	<ul style="list-style-type: none"> • OUTPUT 3: Sustainable Human Settlements (SPATIAL and HOUSING) 	<p>23. Mention is made of the Portland Perth/Empire and Louis Botha/Alexandra corridors and their implementation as a deliverable by 2016.</p> <p>24. In a similar vein, the Turffontein Strategic Framework Area should also be considered as an urgent deliverable in view of the need to address the social, economic and environmental degradation.</p> <p>25. It is important that the city provides for investment into the physical environment and infrastructure and upgrading of the area.</p> <p>26. The opportunity to provide public housing areas, increased densities of development and the upgrading and regeneration of these existing areas should be</p>



PAGES	IDP COMPONENT	COMMENT
		<p>realised as a matter of urgency.</p> <p>27. In addition, the preservation of existing open space and green areas, such as Moffat Park, should be carefully guarded to facilitate open space for increased densities in existing urban areas where upgrading and densification is being actively pursued.</p>
52	<ul style="list-style-type: none"> • OUTPUT 4: Climate change resilience and environmental protection 	<p>28. This should be a priority output for the Klipriviersberg region with the environmental and biodiversity value and opportunities considered as the driver of the economic and social development agenda as required in terms of the GDS2040.</p> <p>29. The initiatives, projects and programmes of KlipSA and SOJO are founded on the principle of protecting, promoting and enhancing the value of the biodiversity and environmental assets of the region.</p> <p>30. KlipSA would request recognition as a key stakeholder in this regard, particularly in any City initiatives in the region.</p> <p>31. iProp welcomes the recognition of the establishment of a network for Independent Renewable Energy Producers and would wish to be recognised and participate in the network.</p>
53-55	<p>OUTCOME 3: AN INCLUSIVE, JOB-INTENSIVE, RESILIENT AND COMPETITIVE ECONOMY THAT HARNESSES THE POTENTIAL OF CITIZENS</p> <ul style="list-style-type: none"> • OUTPUT 1: Job intensive economic growth • OUTPUT 2: Promotion and support to small business (PRIORITY) • OUTPUT 3: Increased competitiveness of the economy • OUTPUT 4: A smart city of Johannesburg, that is able to deliver quality services (PRIORITY) 	<p>32. SOJO supports the City in realising the importance of an active tourism market that is generating employment opportunities in the southern areas of Johannesburg.</p> <p>33. SOJO is concerned that the City has reduced the importance of tourism its institutional structure and suggests that the outcome and deliverable should be the re-establishment of a tourism agency or department.</p> <p>34. Furthermore, it is recommended that tourism is recognised as a key economic sector in the City and a tourism strategy should be prepared with all major stakeholders.</p> <p>35. A deliverable for realising increased job opportunities and reduced unemployment should focus on the City improving its competitiveness in relation to the time and costs associated with development of industrial and commercial areas. The current City processes, procedures and costs inhibit efficient and effective establishment of township's and development to the extent that investors have chosen not to invest in the City in preference for adjacent municipalities.</p> <p>36. The establishment of the Region F Interface Forum between the City and business and community sectors outside the inner city should be included as a deliverable to improve the delivery of services and infrastructure to attract and retain business development and investment in the southern areas.</p> <p>37. The Agritropolis has significant potential for labour intensive employment with vertical integration of beneficiation and distribution of produce significantly advantaged by the near proximity to South Africa's largest</p>



PAGES	IDP COMPONENT	COMMENT
		<p>fresh produce market. It will also offer significant carbon advantage due to reduced tonnes per kilometer for distribution of produce to market.</p>
56-59	OUTCOME 4: A HIGH-PERFORMING METROPOLITAN GOVERNMENT THAT PROACTIVELY CONTRIBUTES TO AND BUILDS A SUSTAINABLE, SOCIALLY INCLUSIVE, LOCALLY INTEGRATED AND GLOBALLY COMPETITIVE GAUTENG CITY REGION (GCR) <ul style="list-style-type: none"> • OUTPUT 1: An active and effective citizen focused GCR • OUTPUT 2: A responsive, accountable, efficient and productive metropolitan government • OUTPUT 3: A Financially and administratively sustainable and resilient city • OUTPUT 4: Meaningful participation and empowerment 	<p>38. Although the City promotes active and effective citizen participation the processes and procedures employed are inadequate and do not enable meaningful participation and engagement.</p> <p>39. An example being the public meeting for Region F:</p> <ul style="list-style-type: none"> • the venue, catering , transportation and other arrangements for the public meeting for Region F on Saturday 29 March appear to have been timeously organised; • however, the event was only advertised in The Star newspaper on Friday 28 March (with no information regarding timing of the event) and no other notices or information were provided to the community informing them of the event using e-mailing of databases or local community newspapers; • during the breakaway sessions councillors were given ample time for oral submissions however as a member of public was invited to speak at he was informed that he had to keep the submission short as time was running out; • none of the points raised in a comprehensive oral submission by a member of the public were captured by the facilitator in the summary of issues raised. <p>40. Current processes and procedures are meaningless and the public participation and engagement can be considered as farcical.</p> <p>41. The processes and procedures for public participation need to be carefully reviewed to ensure meaningful participation and interaction with stakeholders.</p> <p>42. This could include the establishment of specialist and focus groups involving known contributors and participants as well as specific sectors of business and community.</p> <p>43. Furthermore, improved planning, organisation and advertising of public events and participation including the establishment, management and use of stakeholder databases to provide adequate information and notice regarding processes of engagement and expansion of the contributor base.</p> <p>44. While Community Based Planning provides for general public and community participation is supported inputs and suggestions made at the meetings should be fully recorded and captured. For example, submissions made at the Region F Community Conversation have not been recorded.</p> <p>45. In addition, multiple requests for a specific opportunity to present proactive initiatives, projects and</p>



PAGES	IDP COMPONENT	COMMENT
		programs for consideration should at least be acknowledged by the professional team preparing the IDP review.
60-67	Spatial Development Framework (SDF)	<p>46. iProp, SOJO and KlipSA acknowledge that a revision of the SDF is currently underway and wish to be recognised as key stakeholders in the process of review.</p> <p>47. In particular, the East-West Development Corridor (EWDC), now identified as a Corridor of Freedom, is particularly important for the future of the city and its economic, social and environmental development.</p> <p>48. Project Hloekisa must be recognised and included in the review process to ensure the viable and sustainable removal of point sources of environmental pollution located in the mine-impacted areas and to contribute to addressing Acid Mine Drainage (AMD) and its implications.</p> <p>49. Subject to the findings of the detailed environmental investigations to be initiated by JPC into the environmental and biodiversity value of the Southern Farms, the KEEDZ initiative and in particular the agriropolis proposal should form a key component of the SDF review.</p> <p>50. In particular, a review of the Urban Development Framework for the Klipriviersberg region is required to accommodate the new approaches and thinking regarding the importance of the environment and appropriate social and economic development to protect promote and enhance the value of the biodiversity and natural assets of the region.</p> <p>51. While the City claims "to ensure the responsible use of environmental resources and the promotion of environmental best practices" (page 66) we note our objection to the City continuing to pursue the development of the environmentally valuable area of Moffat Park for primarily residential development.</p> <p>52. The persistence in realising the residential development and removing important open space area against its existing planning and development policies opens questions about the City's sincerity in this regard.</p> <p>53. Particularly in the light of the Turffontein Strategic Area Framework looking to upgrade and densify the surrounding residential areas which will require additional open space facilities and green infrastructure.</p> <p>54. It is suggested that there are other alternative uses and development opportunities, including agri-resource centres and intensive urban agriculture, that would be of more value to the City and communities that need to be explored which in effect will provide a revenue stream for the management and maintenance of the open space area.</p> <p>55. It is noted that working groups are considering policy approaches on specific themes and aspects of city development. IProp, SOJO and KlipSA request recognition as key stakeholders in the development of these policy approaches.</p>



PAGES	IDP COMPONENT	COMMENT
		<p>56. In support of meaningful participation and to provide input for the formulation of the policies it is suggested that the stakeholders in the private sector are included at the beginning of these processes and not only towards the end.</p>
68-70	Basic Service Delivery	<p>57. With the current state of repair of services in the City one has to question the statement that the City "commits itself to excellent proactive delivery of services to all residents, creating an environment that is resilient sustainable and liveable."</p> <p>58. There would appear to be a complete breakdown in the management and maintenance of services in the City resulting in an unacceptable environment for residents and business. SOJO is constantly dealing with management and maintenance issues in an endeavour to assist its members.</p> <p>59. The Region F Interface Forum should be recognised as one of the structures to improve service delivery.</p>
71	2014/16 Priority Implementation Plans	
81-92	PRIORITY 2: AGRICULTURE AND FOOD SECURITY	<p>60. It is suggested that the preliminary investigations proposed by JPC should be included in the City's Agriculture and Food Security Priority Implementation Plan with a view to developing the KEEDZ and the agritropolis proposals for the Klipriviersberg region to accommodate the three levels of intervention provided for in the COJ Food Resilience Framework.</p> <p>61. Mention is made of the establishment of agri-resource centres in the Corridors of Freedom to address the sustainability of food security. It is suggested that Moffat Park would be an area that needs to be investigated for this purpose in the Turffontein Corridor.</p> <p>62. KUBiC should also be considered as an opportunity to introduce food security interventions particularly in the poorer residential nodes along the Kliprivier Drive.</p>
109-133	PRIORITY 4, 8 & 9: ECONOMIC DEVELOPMENT	<p>63. Consolidation of these three priorities relating to SMME and entrepreneurial support, investment attraction, retention and expansion and the green economy is considered to be inadequate as each has a vital role to play in the future growth and development of the City.</p> <p>64. In addition, the structure and content of this section of the IDP is considered to be below an acceptable standard particularly in view of the importance of these priorities.</p> <p>65. Based on presentations and documentation tabled at the Joburg Business Forum it is suggested that this section should be critically reviewed and rewritten.</p> <p>66. As it is difficult to provide meaningful comment and input into these priorities we reserve our rights in this regard.</p>



PAGES	IDP COMPONENT	COMMENT
134-136	PRIORITY 5: ENGAGED ACTIVE CITIZINERY (sic)	<p>67. It is suggested that greater detail is required in this section regarding the plans and programs to provide opportunities for meaningful engagement with the various communities of the city.</p> <p>68. In this regard we would suggest that the recognition of the Region F Interface Forum and similar structures whereby the City is able to engage with business and community organisations should also be included.</p> <p>69. The Johannesburg Business Forum and its associated subcommittees is also an institution of active citizen participation and should also be recognised.</p> <p>70. Other similar structures whereby sector specific, professional, business or community organisations engage with the city should be identified.</p>
137-150	PRIORITY 5: RESOURCE SUSTAINABILITY (sic)	<p>71. This heading should be corrected to "Priority 6".</p> <p>72. It is suggested that this priority requires greater details as to how the City will use environment and resource sustainability to drive sustainable social and economic development for the city and its communities.</p> <p>73. Mention is made under the "Broad Assumptions" of a concept of resource sustainability including a number of elements which have not been detailed (page 138).</p> <p>74. As far as the Klipriviersberg region is concerned this priority should incorporate the recommendations for the specialist environmental studies and proposed plan of action as recommended by the JPC in its report to the Council on 31 October 2013.</p> <p>75. The Klipriviersberg region will be a good example whereby environmental sustainability is the driver of the City's developmental agenda.</p> <p>76. It is suggested that the City also recognises the opportunities and resources in communities where conservation and biodiversity are recognised in conservancies, protected areas or nature reserves such as the Klipriviersberg Nature Reserve which is about to be proclaimed as a nature reserve by Gauteng Department of Agriculture and Rural Development.</p> <p>77. Partnerships with residential and business communities through active citizenry should be established to assist the City in this priority to address mitigation measures and the possibility of biodiversity offsets mechanisms being introduced.</p> <p>78. Engaging with local community and business associations such as SOJO and KlipSA will also assist the city to identify and address real local environmental issues particularly relating to management of biodiversity, energy, water, air and waste.</p> <p>79. KlipSA has initiated a project for the preparation of an Integrated Management Plan for the Klipriver wetland area. This has been done in conjunction with officials from the City and should be recognised as a community based initiative to address river health.</p> <p>80. The reclamation and development of the mine</p>



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		<p>impacted areas through Project Hloekisa is also a long-term measure that will contribute to addressing water quality and AMD and will improve the general environmental quality particularly relating to dust management and inequality.</p> <p>81. iProp's Robinson Dump waste to energy and other alternative energy generation projects are an ideal opportunity for the City to address climate change initiatives and environmental resource sustainability.</p>
151-158	PRIORITY 6: SMART CITY (DRAFT) (sic)	<p>82. This heading should be corrected to "Priority 7".</p> <p>83. It is understood that Nasrec has been identified as a Gauteng Premier's Project for the establishment of a Smart City to utilise the IT infrastructure and capacity provided for the 2010 World Cup soccer event.</p> <p>84. It is recommended that the City implements the Nasrec Urban Development Framework approved in 2005 to take advantage of this IT infrastructure.</p> <p>85. In previous years a public private partnership was established through the Nasrec Landowners Forum to drive the formulation of the Nasrec UDF. This should be resuscitated as a vehicle for engaging with key stakeholders for the development of this economic node to utilise the IT and other major infrastructural investments in the area.</p>
160-170	PRIORITY 10: SAFER CITY	<p>86. SOJO focuses a large proportion of its time to address this Priority on behalf of its members.</p> <p>87. The rapidly increasing problems and costs associated with illegal dumping, activities, uses and buildings is extensive and is impacting on local business and residential communities.</p> <p>88. Although SOJO has a Memorandum of Understanding with the Region F office, stronger measures and enforcement is of critical importance to address these increasingly common issues.</p> <p>89. The Region F Interface Forum is a measure initiated by the business and residential communities to address improved service delivery and address the objectives of this Priority. This Forum should be recognised as one of the projects or interventions in partnership with business and residential communities.</p> <p>90. The unfortunate fact that nothing has happened since the City accepted this initiative in 2012 is a great disappointment and should be addressed as a component of this Priority.</p>
No page number	Community Based Planning and Stakeholder consultation	<p>91. A number of comments and suggestions have been made above regarding this component including:</p> <ul style="list-style-type: none"> • improvements to the CBP process to realise meaningful and genuine engagement and participation with stakeholders • recognition of existing structures such as the Joburg Business Forum • the establishment, management and use of



PAGES	IDP COMPONENT	COMMENT
		<p>stakeholder databases for communication</p> <ul style="list-style-type: none"> • willingness of iProp, SOJO and KlipSA to be active stakeholders <p>92. It should be noted that oral contributions made to the Region F Cluster Community Conversation held in November 2013 at the Klipriviersberg recreation centre have not been captured.</p> <p>93. With respect, the IDP and its contents is an extremely complex document (359 pages). In view of this, one has to seriously question effectiveness of the mass participation of communities at a local level "to reflect on the IDP to determine to what extent the city's plans respond to issues raised during previous outreach processes" (page 197) through the current processes of outreach and engagement.</p> <p>94. Furthermore, in this regard the comments on the role that communities play in the Performance Management System "through the annual IDP and reporting consultation processes" (page 325) and through Ward Councillors are seriously disingenuous.</p> <p>95. It is recorded that the Johannesburg Business Forum has not been included in the consultation process for this review.</p>
198-321	Medium Term Budget	<p>96. The following are comments regarding the budget items:</p> <ul style="list-style-type: none"> • page 215: public environment upgrade projects at Westgate: Issues regarding the infrastructure demands for future development in the area were being addressed at the Westgate Developers Forum but this has been inactive for a while, in part due to economic factors impacting on the market potential for development in this area. We request that the Westgate Developers Forum be revived for effective planning for infrastructure requirements to attract development to the area over and above that which is already being implemented by JDA. • 218–223: service capacity backlogs: we request clarity on the impact of the Eskom program or failure to meet program dates on the supply of new and increased power for new development on the future development potential for the City and what action is the City taking in this regard. • 226-260: budget allocations for various services and development through the city: in the interests of collaboration and transparency the City should establish mechanisms to provide progress reports regarding the budget spend and project progress. Infrastructure projects have significant lead in times for various reasons, such as GDARD, DMR, parastatal company real rights and comments, and can be shelved. The public have no way of knowing what the status is of any project and therefore cannot hold the City or MOE to account for the non-realization of the projects which could impact on other investments and



PAGES	IDP COMPONENT	COMMENT
		<p>development.</p> <ul style="list-style-type: none"> 297-314: Region F - infrastructure particularly in City Deep and the Robinson Canal (page 302) and M2 Motorway/Main Reef Road (312) and Aeroton and Nasrec bulk water (314): major projects such as Crownwood Road, M2 / MRR upgrade, City Deep Roads, etc have found allocations in the current budgets. What is needed is the City to provide mechanisms accessible to the public to monitor the execution of these projects and budget spend.
346-350	Risk Monitoring and Risk Reporting/communication	<p>97. Risk 12: Environmental Risks: An additional risk should be included as follows:</p> <ul style="list-style-type: none"> Loss of environment and biodiversity value through bad development practices ignoring City Priorities and Policies regarding environmental protection <p>98. Risk 13: Stakeholder Relations Management: the light of the above comments regarding community engagement the progress ensuring intensive engagement with communities has to be questioned in terms of its effectiveness and ensuring meaningful public participation.</p>

We trust that the above contribution will be of value to the City and the preparation of 2014/15 Review of the 2012/16 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 submissions made in previous years in the IDP 2012/16 and 2013/16 review processes, dated 7 May 2012 and 13 May 2013 respectively. The former was-referenced in the final approved IDP document while the latter was incorporated as the Johannesburg Business Forum (JBF) inputs arising from the consultation session held on Friday 10 May 2013. These submissions establish the basis for the review of the IDP and the foundation for this submission.

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.

GENERAL COMMENTS, INITIATIVE AND PROJECT UPDATES AND PROPOSALS

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

With regard to the submission made in 2012 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 IDP 2013/16, we noted that elements and components of the proposals and suggestions submitted 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 despite being listed as a result of the above-mentioned JBF consultation.

As proposed and accepted through recognition in the 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) now identified as a Corridor of Freedom. In addition, 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 have been held over the past few years. However, very little progress has been made in terms of realisation and implementation. Furthermore, we have received no feedback or response regarding the submissions that have been 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 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 (including the Economic Development Section 79 Committee), 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 representatives of national departments.

This has culminated in a presentation to the Executive Mayor Cllr Parks Tau on 26 November 2013 who requested Cllr Roslynn Greeff to establish and lead a senior task team of MMCs and senior officials to take the various proposals and initiatives forward.

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 where 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 on approximately 1540 hectares of Council owned land;



- 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.

In this regard, the report tabled before the Council on 31 October 2013 by Joburg Property Company is recognised as a strong starting point to undertake extensive environmental sensitivity investigations and to plan for the preservation and sustainability of natural areas ahead of identifying land for future development.

3. Rehabilitation and development of mine impacted areas

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

As noted in our previous submissions, 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. This has now been recognised by the City with the EWDc being identified as a "Corridor of Freedom".

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 have 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.

The City's 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 (EWDC) having developed approximately 1000 ha over the last four decades. iProp looks forward to further engagement with the City in the review of the associated policy and the promotion and development of the identified Corridor of Freedom.

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 also contribute to addressing AMD.

We have been party to the conceptualisation of Project Hloekisa aimed at the removal of mine residues 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. ERGO has built a key component of the infrastructure for this project being a pipeline from the existing reclamation plants from central Johannesburg through to the ERGO facility in Boksburg costing approximately R400m.

From a financial feasibility and viability perspective a financial model has been suggested to realise optimal removal of mine residues to release well-located land to the centre of Johannesburg for future mixed-use development,. 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 and the establishment of the Corridor Freedom through the region, 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 previous IDPs it is apparent that the focus of policies, interventions and budget allocations in Region F 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, Booysens Hotel, Lido Hotel, Wemmer Pan and Pioneer Park (despite continued problems relating to leases and administration by Joburg Property Company) 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 submissions, initial meetings and discussions have 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 Roslyn Greeff of a letter of understanding for the establishment of the Region F Interface Forum on 22 August 2012. It is unfortunate that nothing further has happened in this regard since that date.

The purpose of the Interface Forum is to help the City 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, including the Turffontein Strategic Framework Area, focusing on nodes and corridors, 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
- Booysens
- Klipriviersberg and Panorama
- Nasrec
- Southgate
- Rossherville 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 various 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 nearly 100 scrap metal dealers in Booysens 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. Greening 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 (Kliprivier Urban Biodiversity Corridor).

This is in support of the GDS2040 proposal for establishing corridors and "Greenways" for public transportation and is based on the existing dual carriageway. With the focus on establishing and developing public transportation facilities and services 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 nodes 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 with improved public and non-motorised transportation and pedestrian 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 (27000 m² of mixed-uses including residential, offices, commercial, retail and ecotourism) and Aspen Ext 9 (65,000 m² retail and commercial uses - currently under construction)
- the extensive conference, tourism, sports and recreation facilities in the southern areas requiring access for broad range of local and international visitors and communities.

As the western boundary of the Turffontein Strategic Area Framework this initiative will support and enhance the desired outcomes of this Corridor of Freedom area.

It is suggested that the public transport facilities required include expanding and extending the 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 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 IDP are considered to be extremely narrow in a focus, reactive and lack substance regarding environmental issues, 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 are strongly supportive of the Corridor of Freedom being established in the southern areas of Johannesburg and the formulation of the Turffontein Strategic Area Framework.

In previous submissions, we have noted that the City should recognise 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 are 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. This is 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.

Furthermore, with the active focus on identification in this southern region the need to protect and maintain available open space areas such as Moffat Park becomes more important for providing suitable facilities for increased densities and growing community populations.

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.

Furthermore, we are actively participating in the formulation of the Turffontein Strategic Area Framework and will continue to make contributions in this regard.

10. Sustainable Energy generation: Waste to Energy and Other Alternative Generation Opportunities

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. This will 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.