

11 May 2025

Executive Mayor Geordin Hill-Lewis
City of Cape Town

CC: Alderman Eddie Andrews, Mr Robert McGaffin

Dear Executive Mayor Hill-Lewis

**COMMENT FROM THE WESTERN CAPE PROPERTY DEVELOPMENT FORUM (WCPDF) ON
CAPE TOWN CENTRAL BUSINESS DISTRICT (CBD) LOCAL SPATIAL DEVELOPMENT FRAMEWORK
(LSDF)**

On behalf of the Management Committee of the WCPDF, and the industry members our organisation represents, we formally submit the following comment on the Cape Town CBD LSDF.

Our industry drives economic development through the delivery of productive property assets and infrastructure. It is against this background that we deliver our overview on the overall direction of CBD LSDF.

This comment addresses the urban design and heritage aspects as well as the urban planning and development of the draft CBD LSDF. The departure point for this comment is a consideration of the long-term trajectory of city making, and the type of policies that help and harm this process as best understood in 2025. Helpfully, along with the brief examples contained herein, there are a myriad of global examples to refer to, as well as the UNESCO cities register.

Good intentions

We support the process of converting the MSDF into a series of LSDFs in order to provide strategic development, and the proposed CBD LSDF is well-intentioned. There are, however, a number of issues that still need to be addressed, failing which the LSDF will lose its strategic intent and value.

The mismatch between vision and execution

The LSDF refers to “transition” but is silent on what it is transitioning to. There is no clear economic statement of intent that leads to urban design response. The LSDF should provide a visionary and clear direction of travel in an enabling and guiding manner. Instead, it only provides a short generic vision statement followed by standardised urban design theory and diagrammes. Failing a clear growth strategy statement, the approach may only lead to more subjective opinion responses in assessing future land-use applications.

We propose that the vision statement be replaced with the following and that the LSDF be redrafted to compliment the following:

“The original economic logic of the Cape Town CBD, founded on a marine, agriculture and government economy, has substantially changed over the years.

Today, the CBD economic hierarchy is primarily based on the tourism sector, underpinned by heritage and natural beauty, followed by substantially reduced finance, governance and legal components.

The significant role that the harbour economy plays directly in the CBD, has reduced to the accommodation of cruise liners and recreational craft, support services and yacht construction as well as the tourism interface provided by the V&A. The rest of the harbour trade revenue decants worldwide to operating offices located in other parts of the world bypassing the CBD of Cape Town.

To strengthen the CBD economy and ensure longevity, the vision for the CBD is to be an internationally recognised tourism and IT innovation hub, supported by being an internationally recognised conference node. The vision is supported by the support and strengthening of the secondary layers, being commercial and retail support and housing.

The vision of a quality urban space will be realised by structuring quality and safe connectivity and linkages between the various building blocks of the CBD.”

Ideally, the LSDF should have been drafted from an economic growth perspective, allowing for a level of out-of-the-box responses from the market. Unfortunately, the draft LSDF appears to be drafted from a narrow urban-design perspective on how CBD should be developed from a town-planning perspective only. This perspective is valid and good, and is certainly one scenario that may play out. However, cities need to be places of “1 000 designers” to flourish. The local authority’s necessary role to guide and manage planning can be done in an enabling way that permits a variety of scenarios, without prescribing one preferred scenario.

The local authority needs not hold the full vision for the city, including its relationship with all other urban nodes in the metropolitan area, and it should share the developing vision among the entire citizenry over the very long term. The CBD is only one building block in the tapestry, but a significant one if treated within its unique strength and economic potential. This requires honesty on what the CBD is and can be.

Relationship with other business nodes

An introductory section that provides an overall “helicopter” view of how the proposed direction of the Cape Town CBD will relate to and encourage the development of other business nodes in Cape Town is missing. It appears to be a “business as usual” strategy that simply magnifies the many things that the CBD has traditionally been and seems to assume that it should continue to grow in the same direction.

It is the time to create a bigger, bolder vision that speaks to the socio-economic asymmetry that has for decades stifled Cape Town. The current CBD plan appears to simply exacerbate the problems that this specific area – an area constrained between mountain and sea already – continues to encounter. While we applaud the initiatives to green the area and make it more pedestrian-friendly, a vision to drive it in the economic directions to which it is most suited, and encourage diversification to other areas, is missing. The current plan does not address economic growth and focusses exclusively as a beautification project.

It appears that the central CBD will increasingly be promoted as a generic “best place in town” to invest without actively relating to other CBDs and nodes in the metropolitan area. The current approach will not alleviate but rather exacerbate the critical problems around transportation in and out of the CBD with its promotion of ever-increasing office space, and the assumption that it will remain the single largest employment area in the metro. Nor will the proposed residential growth make any difference to this challenge.

Regressive view of heritage resources and related long-term risks

In general terms, Cape Town has the joy of one truly outstanding heritage resource of global significance, which is the Cape Floral Kingdom. This must be protected at all costs. Thereafter, there are the UNESCO sites (eg Robben Island) which too must be protected as significant global resources.

Beyond this, Cape Town has a very small number (in global terms) of well-made buildings from the 1800s to 1950s. As can be seen in countless global examples (Shanghai and Sydney to name two large examples, and Cincinnati being a relevant example to Cape Town in terms of size, age and density of older buildings), such buildings should be integrated into and embraced as and when development sweeps through such metropolitan areas.

The LSDF is attempting to freeze the 1850s-1930s buildings in time and plan the trajectory of city development around these, as seen for example in the inappropriate proposals to constrain development height in the Mid-city Precinct 7. The character and built heritage resources of the Mid-city can easily be retained and enhanced through making this central city component the true centre, rather than the current effort to ‘hollow out’ the centre and place tall buildings on the periphery. From here, the vibrant, activated city functions will extend to other areas, such as the Foreshore.

Our larger concern is that this shortsighted approach to heritage resources management will have the following outcomes:

1. In the short term, a constraining of development in the CBD in order to protect a small number of built heritage resources in an urbanising city will result in more urban sprawl, with inevitable damage to the true heritage resource (the Cape Floral Kingdom).
2. In the long term, we cannot foresee that future administrations will maintain this myopic and regressive policy approach. Our fear is an inevitable overcorrection of policy in future, which may result in the granting of demolition orders to the very same 1800s-1950s buildings that are being overprotected now.

Future trends based on historical trends not vision

The document seems to simply promote the growth of the same multi-faceted factors that currently place the Central City under enormous strain. Our concerns can be clearly understood and summarized simply by looking at **Chapter 5.8: Anticipated land use growth in the medium term (10 years)**.

The predictions for the future seem to be based entirely on historical trends and baseline data, without any attempt to encourage what the Central City *could* do best (i.e.: a stronger emphasis on tourism, residential, retail, educational institutions, conferencing and exhibitions), while encouraging certain sectors *currently* taking up office and industrial space to possibly consider other areas in Cape Town for more viable economic growth – both for those areas and for the sectors themselves.

We feel the LSDF falls into the trap of planning that relies on no more than the historical trends that exist, rather than a more outward-thinking, innovative plan that proposes solutions to a metropolitan city that is still structured along Apartheid lines.

To this end, we note two examples, the first being Munich which took the wise decision in 1998 to develop its highly integrated development concept "[Perspective Munich](#)" that embraces both a prospering city and mega-city region. In contrast to this, you have the failings of São Paulo which allowed its city centre to grow unsustainably, resulting in the significant challenges it now faces. These include inadequate housing, environmental problems like pollution and water shortages, severe issues with public services like sanitation and infrastructure and in addition traffic congestion, crime and economic inequality – all contributing to a massively challenged urban environment from which it seems unable to return. And all of this the result of continually investing in the area in which it saw the "most confidence".

Bypass route will isolate the CBD

We must also note with concern what appears to be the re-incorporation of what has become known as "Solly's Folly" in **6.1 Development Strategies**, particularly 6.1.1 (Mobility Strategy), the massive bypass conceptualised in the 1970s that will further isolate the Central City, and sever it from the rest of the metro. Section 3.1 of the analysis discusses transport infrastructure that segregates, divides and sterilises parts of the urban landscape, including the freeways (Foreshore Freeway, N1 & N2), and the railway lines and terminus station. Yet the same document proposes a similar strategy in the bypass route. Part of what is driving the congestion is the massive imbalance between residents and jobs. The emphasis should therefore be on a land-use shift to additional residential units and improved public transport routes rather than new roads.

Port Functionality and Urban Design

The current vision for the port and its importance for the CBD need to be unpacked. The Port is an important land use; however, its role with relation to the surrounding smaller ports and harbours (similar to the role of the CBD in relation to the other surrounding Business Districts), requires a vision and focus. There are limits to its viability as a commercial port due to technical limitations and size, and its role in support of the vision for the City is critical. IE if the vision for the CBD is to encourage tourism and heritage, then the Port's role in supporting this is vital.

It is suggested that the City should engage with the port authorities to develop a collaborative plan that addresses a collective vision. At the same time, the Port can assist in alleviating some of the congestion currently experienced by the CBD at the local level, through the utilisation of some of its infrastructure for public transportation purposes such as Duncan Road.

Administrative challenges

The CBD is already guided by the DMS, the CBD local area overlay, and the related densification, urban design policy and tall building policies. These documents contain sufficient controls and encodings of qualitative design guidance in order to guide development, along with the multiple opportunities for public participation per application.

Adding further administrative processes and requirements to this will lengthen application timeframes which are already so long and unpredictable that large capital flight is taking place from the CBD and into jurisdictions where planning approval timeframes are more predictable. Lastly, it is plain that the City has not carried out a regulatory impact assessment on this proposal, despite being asked to do so in the round one comments.

Legal challenges

It is our understanding that the Urban Design Department and Heritage Department have commented on capacity only, and have no delegated decision-making authority. While there is a promulgated urban design policy, the lack of departmental authority places enforcement of this policy with the planning officials. It cannot follow that adding a design-driven policy to the mix without the necessary underlying legal capacity within the appropriate departments is either a good or useful policy.

Design challenges


The LSDF map makes a laudable attempt at mapping the current built form and short-term development trajectory. As pointed out at length by others in the round one comment, the “indicators” supplied in the LSDF only provide a very rough guide, and lack the nuanced detail required to be functionally useful at the level of an application. The indicators therefore remain of no use, but could be used as a basis to comment on applications if the LSDF is promulgated. The outcome of this will be further opiniated debates on the merits of applications without the necessary policy detail upon which to act.

Summary and recommendations

The lack of clarity and purpose of the LSDF, plus the duplication of existing polices, the constraining nature of the proposals in the LSDF, and the lack of usefulness of the guidance in the LSDF, means that this endeavor should be reviewed, which requires an updated draft of the LSDF. Instead, we recommend that:

1. The LSDF must be informed by a clear economic growth vision, currently missing in the draft LSDF.
2. Local authority capacity must be allocated to applications based on current policies.
3. A long-term view of heritage resource management view must be taken, this to be encoded in policy, and this policy tested through a regulatory impact assessment prior to promulgation.
4. The LSDF must endorse the universally-agreed basics of the built form of thriving cities – which can be summarized as fine grain, high density, mix of uses and active streets. This must become the focus of administrative capacity through existing policies.
5. Achievable and practical additional enabling measures, such as urban greening, be added to future iterations of existing policies.

Yours faithfully



DEON VAN ZYL

Chairperson: Western Cape Property Development Forum (WCPDF)