



CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD

Case ID 1500147714

**Erf 148639, 15 Beach Road,
Woodstock, Cape Town (Site A), 2, 4, 6,
6B, 2B, 6C, 2B Railway Street,
Woodstock (Site B)**

Development Management

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THE WOODSTOCK

**Erf 148639 Cape Town (Site A) and
Erven 10221, 10223, 10224, 10225, 149351 and 149348 Cape
Town (Site B)**

**APPLICATION FOR DEVIATIONS FROM THE CITY OF CAPE TOWN
MSDF, TABLE BAY DSDF, WOODSTOCK-SALTRIVER LSDF,
CONSOLIDATION, SUBDIVISION, REZONING AND REGULATION
DEPARTURES**



Prepared by:



Planning Partners (Pty) Ltd
PO Box 4866 Cape Town

For:

In association with:

Stef Naudé Transport Consulting
Nadeson/Struxit Engineers
Converge Consulting
BAR Architects
Jakupa
Claire Abrahamse

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1. INTRODUCTION

1.1. Overview of the Application Submitted

Planning Partners has been appointed by _____ supported by _____, on behalf of the Passenger Rail Agency of South Africa (PRASA), to submit a composite land use application in respect of the proposed redevelopment of strategic PRASA-owned land in Woodstock, Cape Town. The locality is illustrated in **Figure 1**. The application pertains to (see **Figure 1** and **Figure 2**):

- Erf 148639 Cape Town (Site A), and
- Erven 10221, 10223, 10224, 10225, 149351, and 149348 Cape Town (collectively Site B).

The proposed redevelopment seeks to transform these underutilised urban sites into a mixed-use, transit-oriented precinct that will contribute to the regeneration of the Woodstock-Salt River area. The proposal supports inclusive economic growth, job creation, and the delivery of well-located social and affordable housing opportunities. Following the pre-application consultation held with City of Cape Town officials on respectively on 12 June 2025 and 16 July 2025, (see **Annexure A**), as required in terms of Section 70(2) of the Municipal Planning By-Law (MPBL), the application includes the following components:

a. Policy Deviation – Municipal Spatial Development Framework (2023)

In addition to the District Plan deviation, a separate deviation application is submitted in terms of **Section 9 of the MPBL** (application submitted in terms of **Section 42(u)**), to deviate from the Municipal Spatial Development Framework (MSDF, 2023).

The MSDF promotes densification, mixed-use growth and urban regeneration within the Urban Inner Core, in line with the City's economic growth strategy aimed at creating employment opportunities, particularly for youth. This application therefore seeks formal approval to enable the transformation of a historically industrial site into a retail- and housing-led mixed-use precinct that remains economically productive, strengthens the local employment base, and contributes significant social and residential value to the Woodstock–Salt River corridor. The motivation for this deviation demonstrates:

- Alignment with the MSDF's Spatial Transformation Areas (STAs), particularly the objectives of compact, inclusive, and connected urban growth;
- Support for the City's Urban Inner Core investment priorities, including inner-city regeneration, job creation, and accessible housing delivery;
- Compatibility with the Woodstock & Salt River LSDF (2023), which identifies the broader precinct as a strategic regeneration zone with mixed-use potential; and
- Retention of long-term adaptability through the proposed MU2 zoning, which permits compatible light-industrial and service-industrial uses, ensuring flexibility to respond to future market dynamics without compromising the precinct's mixed-use, people-centred character.

This deviation aligns with the City's procedural requirement for explicit MSDF justification and demonstrates how the proposal advances the intent of the MSDF's spatial transformation and economic inclusion objectives.

b. Policy Deviation – Table Bay District Spatial Development Framework (2023)

In terms of **Section 16 of the MPBL** (application submitted in terms of **Section 42(u)**), approval is sought for a policy deviation from the Table Bay District Spatial Development Framework (2023), which currently designates the subject land predominantly for industrial purposes, in order to permit redevelopment for mixed-use purposes.

This deviation is motivated by the following site-specific considerations, *inter alia*:

- The site is strategically located within the Urban Inner Core (UIC) and in close proximity to existing public transport infrastructure, rendering it highly suitable for a Transit-Oriented Development (TOD) typology.
- The proposal introduces a diversified mix of land uses, including social housing, offices and retail activities, which directly advance the MSDF's spatial transformation and economic inclusion objectives.
- Retention of the site exclusively for industrial purposes, in its current fragmented and underutilised state, is no longer aligned with prevailing market realities or the precinct's regeneration trajectory. The proposed rezoning does not, however, negate future industrial use, as 'industry' remains a primary use right within the proposed Mixed Use Zone.
- The mixed-use redevelopment delivers enhanced public benefit through improved access to affordable housing and the upgrading of the public realm.
- The application for a deviation from policy, will not create an undesirable precedent, as the deviation is strictly site-specific and does not apply to core industrial precincts such as Paarden Eiland or Culemborg.

A detailed Policy Deviation Motivation has been included under **Section 3** of this report.

c. Policy Deviation – Woodstock Salt River Local Spatial Development Framework (2024)

In terms of **Section 16 of the MPBL** (application submitted in terms of **Section 42(u)**), approval is sought for a policy deviation from the Woodstock Salt River Local Spatial Development Framework (2024) (LSDF), which currently designates the subject land for industrial (Site A) and green in-between space (Site B) purposes, in order to permit redevelopment for mixed-use purposes.

This deviation is motivated by the following site-specific considerations, *inter alia*:

- The site is strategically located derelict PRASA land, which is identified as a priority for redevelopment and intensification, and presents an opportunity for redevelopment of underutilised buildings and land which would ultimately improve the safety and security of the precinct.
- The introduction of mixed use retail and office space provides opportunity to provide for a diverse affordable business rental premises into a new development in association with high traffic retail provision.
- Prioritise NMT through improved road infrastructure improvements and pedestrian safety in a location within proximity of a range of public transport opportunities;
- Providing for affordable housing near public transport and amenities;

- Promote mixed use intensification and redevelopment within TOD nodes
- Presents infill development and densification within walkable and well located precincts
- Integration of heritage assets into the redevelopment of the site;
- Improving the public realm through landscaping; and
- Improved access substantially to the Lower Church Street through a road infrastructure investment by the developer to materially improve the traffic flow to and from precinct (Subdistrict 8)

A detailed Policy Deviation Motivation has been included under **Section 3** of this report.

d. **Subdivision of Erven 10224, 10225 and 149351, Cape Town (Site B)**

In terms of **Section 42(d) of the MPBL**, approval is sought for the subdivision of Erven 10224, 10225 and 149351, Cape Town into seven (7) portions:

- Subdivision of Erf 10224, Cape Town into two (2) portions being Portion 1 of Erf 10224 (0,5m²) and a Remainder (1 039,5 m²);
- Subdivision of Erf 10225 Cape Town into three (3) portions being Portion 1 (87 m²) and Portion 2 (3 m²) of Erf 10225 and a Remainder (1 171 m²); and
- Subdivision of Erf 149351 Cape Town into two (2) portions being Portion 1 of Erf 149351 (0,4 m²) and a Remainder (125 m²).

The subdivisions are required to accommodate a recently approved and constructed road that takes access of Railway Street and links Railway Street to the Transnet Container Yard to the east of Site B.

Refer to Plan of Subdivision prepared by David Hellig & Abrahamse Professional Land Surveyors (**Annexure B**).

e. **Consolidation of Erven (Site B)**

In terms of **Section 42(f) of the MPBL**, approval is sought for the consolidation of Erf 10221, Erf 10223, Remainder 10224, Remainder 10225, , Erf 149348 and Remainder 149351 Cape Town, resulting in a total consolidated site area of approximately 5 263 m²

Refer to Plan of Consolidation prepared by David Hellig & Abrahamse Professional Land Surveyors (**See Annexure C**).

Note that Erf 10448 Cape Town, has been retained as part of Railway Street, to make provision for vehicle turning.

f. **Rezoning of Erf 148639 to Subdivisional Area and Subdivision of Erf 148639 Cape Town (Site A)**

In terms of **Section 42(a) of the MPBL** approval is sought for the rezoning of Erf 148639 Cape Town (64 493 m²) from Transport Zoning 1 (TR1), Transport Zoning 2 (TR2) and General Industrial Zoning 2 (GI2) to “*subdivisional area overlay zoning*”.

In terms of **Section 42(d) of the MPBL**, approval is sought for the subdivision of Erf 148639 Cape Town (64 493 m²) into four (4) portions and a Remainder:

- Portion 1 of Erf 148639 (unapproved Erf 184179) measuring $\pm 13103 \text{ m}^2$ to be zoned Transport 1 (TR1) to allow uninterrupted operation of the railway line and associated transport functions;
- Portion 2 of Erf 148639 (unapproved Erf 184180) measuring $\pm 2166 \text{ m}^2$ to be zoned Transport 2 (TR2): Public Road to accommodate the proposed quarter link to Lower Church Street;
- Portion 3 of Erf 148639 (unapproved Erf 184181) measuring $\pm 1314 \text{ m}^2$ to be zoned Mixed Use Zone 2 (MU2) to permit a business premises (i.e. Restaurant with drive-thru for a fast-food chain);
- Portion 4 of Erf 149369 (unapproved Erf 184182) measuring $\pm 61 \text{ m}$ to be zoned Transport 2 (TR2): Public Road to incorporate the existing portion of road at the intersection of Beach Road and Railway Street ²; and
- Remainder of Erf 148639 measuring $\pm 46849 \text{ m}^2$ to be zoned Mixed Use Zone 2 (MU2) to permit business premises (e.g. offices, shops, restaurant(s), supermarket etc.) and industry (warehousing). Office space can be used for back of port logistical support.

Provision of the Lower Church Street quarterlink will improve the City's roads as will the improvements to Railway Street and Beach Road intersection. Refer to Plan of Subdivision (**Annexure D**). **Annexures D.1 to D.4** represent the draft diagrams to be submitted to the Surveyor General for approval, should this application be approved.

The MU2 zoning provides a flexible "basket of rights", ensuring a sustainable and adaptive precinct while aligning with the City's mixed-use and TOD directives. Importantly, 'industry' remains a primary use right, of which $10\,000 \text{ m}^2$ of the development will be utilized as an Industry Warehouse of Retail nature. The selected zoning will allow the property to revert to and/or accommodate industrial use should future demand arise.

g. **Rezoning of Site B - Consolidated Housing Site (Erven 10221, 10223, 10224, 10225, 149351, and 149348 Cape Town)**

In terms of **Section 42(a) of the MPBL** approval is sought for the rezoning of the consolidated Site B from General Industrial 2 (GI2) to Mixed Use Zone 2 (MU2) – entire consolidated erf ($\pm 5263 \text{ m}^2$) to permit flats (e.g. social and affordable rental units, with ground-floor community amenities and landscaped open spaces).

The MU2 zoning is considered the most appropriate designation to enable inclusionary residential development within a mixed-use urban fabric, consistent with the Housing Act (No. 107 of 1997), Social Housing Policy (2009) and Social Housing Regulatory Authority (SHRA) guidelines.

h. **Regulation Departures**, in terms of **Section 42(b) of the MPBL**, to facilitate the following:

Number of Vehicular Crossings:

- Beach Road: Departure from Item 140(2)(a) to permit five (5) vehicular carriageway crossings instead of one (1), justified by the functional demands of the retail development and supported by the updated TIA (Stef Naudé Transport Consulting, Oct 2025). (Detail to be determined at build plan submission stage)
- Railway Street: Departure from Item 140(2)(a) of the DMS to permit three (3) crossings instead of one (1), allowing separate service and emergency access points. (Detail to be determined at build plan submission stage).

Street Building Line Relaxation:

- *Beach Road:* Departure from Item 76 of the DMS to relax the 4.5 m street building line to 0 m for specific building elements above 10 m in height, enabling improved architectural articulation, colonnades and pedestrian-oriented frontage treatment. (Detail to be determined at build plan submission stage)

A locality map is provided in **Figure 1**, **Figure 3** shows the current zoning, with an aerial photograph indicating the broader site context in **Figure 4**. This report provides a detailed motivation for the composite land use application, supported by specialist studies, applicable policy frameworks, and technical documentation submitted as part of the application.



 THE SITES

THE WOODSTOCK

LOCALITY PLAN


SCALE 1:4000

APRIL 2025
Job No 4454

PLANNING PARTNERS 

Figure 1

Figure 1: Locality Plan



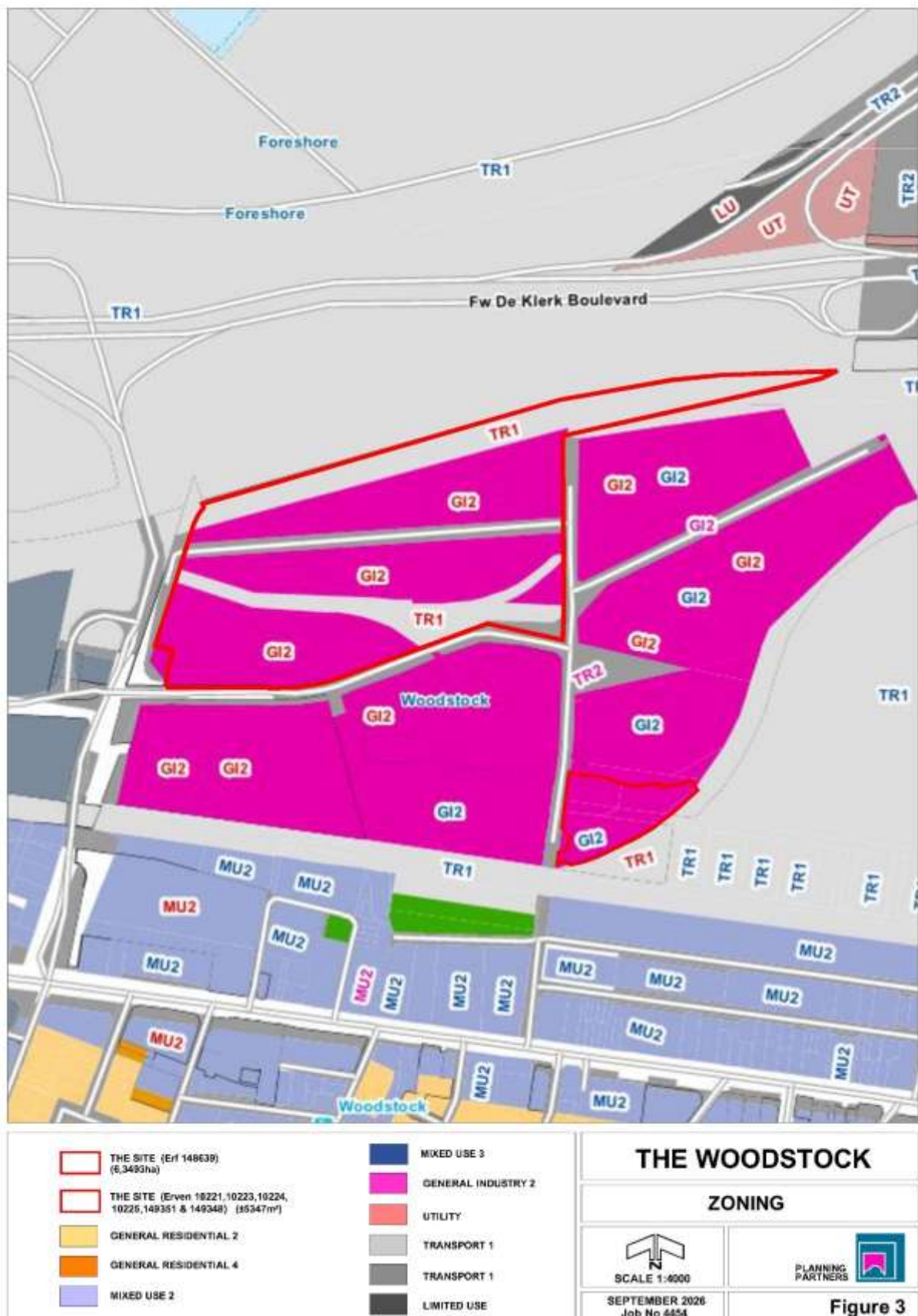


Figure 3: Zoning Map



Figure 4: Sites in Context



Figure 5: Site Topography, Opportunities and Constraints

1.2. Background

1.2.1. Ownership

In 2025, [redacted] entered into a long-term lease agreement (±40 years) with PRASA Cres for the redevelopment of the subject sites in Lower Woodstock (refer to **Annexure E: Power of Attorney and Lease Agreement Summary**). The proposal, driven in partnership with [redacted], aligns with the strategic objective to leverage well-located, underutilised urban land for inclusive, transit-oriented redevelopment within Cape Town's Urban Inner Core.

The lease agreement follows on the successful award of a PRASA tender to redevelop the subject properties for mixed-use purposes, inclusive of affordable/social housing opportunities.

The proposed development forms part of the ongoing regeneration of the Woodstock and Salt River precinct, which is transitioning from historically industrial land uses towards a vibrant, mixed-use urban environment that integrates residential, retail, and employment-generating activities within a walkable and accessible precinct. This application represents the first step in securing the required land use rights to enable the redevelopment of these strategically positioned sites. Upon approval, detailed design processes will commence in accordance with municipal requirements.

2. THE PROPERTY

2.1. Locality and Context

The subject properties, referred to as Site A and Site B, are situated in Woodstock, within the Table Bay District of Cape Town and the Woodstock Salt River LSDF. Positioned within the MSDF-identified Voortrekker Road Development Corridor (see **Figure 6:**) and adjacent to key freight and transit infrastructure – including Esplanade Station, Woodstock Station and IRT MyCiTi routes – the sites occupy a strategic interface between the Cape Town CBD and the Port.

Site A, proposed for a predominantly retail-led mixed-use development, is bounded by Beach Road (south), Lower Church Street (west), Railway Street (east), and the rail reserve (north). The site is bisected by Tide Street, which provides an important mid-block circulation route. Site B, proposed for social and affordable housing, is located southeast of Site A, within walking distance of public transport, existing services and at the northern landing of the Railway Street Pedestrian Bridge over the railway line to the south.

The broader precinct has undergone a notable transition from a predominantly industrial landscape to a mixed-use urban environment, characterised by creative industries, retail activities and residential infill development.

2.2. Property Details

The cadastral configuration of the subject properties is shown in **Figure 2**. The combined site extent is approximately 68 909 m², with Site A comprising approximately 63 493 m² and Site B approximately 5 416 m², inclusive of Erf 10448 Cape Town. Other than Erf 10448 Cape Town,

the properties are owned by PRASA, as reflected in the title deed records. Copies of the title deeds and SG diagrams are included in **Annexure F** and **Annexure G**, respectively. A summary of the basic information about the properties is provided in **Table 1** below.

Table 1: Basic Property Information

Site	Property Description	Registered Owner	Extent	Zoning	Title Deed Ref.	S.G. Diagram No.
A	Erf 148639 Cape Town		6,3493 ha	GI2 TR1 & TR2		2839/1991 1764/1945
	Erf 10221 Cape Town		2094 m ²	GI2		1509/1877
B	Erf 10223 Cape Town		355 m ²	GI2		A3965/1927
	Erf 10224 Cape Town		319 m ²	GI2		A3966/1927
	Erf 10225 Cape Town		1264 m ²	GI2		3429/1898
	Erf 149351 Cape Town		106 m ²	GI2		10196/1991
	Erf 149348 Cape Town		443 m ²	GI2		10193/1991

Erf 10448 Cape Town which is retained as part of Railway Street, is owned by the City of Cape Town, and is currently fenced into Site B.

2.3. Topography

The topography of both sites is relatively flat (See **Figure 5**):

- Site A: Ground levels range from approximately 2.2 m to 3.0 m amsl, with a gentle slope of approximately 0.25% generally draining towards Tide Street and Beach Road.
- Site B: The site is similarly flat, sloping at approximately 0.3% towards Railway Street.

The topography is a typical feature of reclaimed and historically industrialised land along the Table Bay coastline. This topographical condition is advantageous for business premises, industry (warehousing), on-grade parking, and flats with supporting community amenities. The flat terrain also simplifies stormwater management, bulk service routing, and the integration of non-motorised transport infrastructure.

2.4. Existing Zoning and Zoning Justification

Erf 148639 (Site A) and the erven comprising Site B are currently subject to a combination of General Industrial Zoning 2 (GI2), Transport Use Zoning 1 (TR1), and Transport Use Zoning 2

(TR2) in terms of the City of Cape Town Development Management Scheme (DMS). See **Figure 3**. These zonings reflect the historic rail, logistics and industrial role of the site.

The application does not seek a blanket departure from this framework. Instead, it proposes the subdivision of Erf 148639, followed by a differentiated rezoning approach that retains transport functions where required while introducing Mixed Use Zoning 2 (MU2) on appropriate portions to enable a broader range of economically productive and socially inclusive land uses, without increasing bulk beyond that currently permissible under GI2.

2.4.1. Existing Land Use Rights (see MPBL for full land use rights for the below-mentioned zonings):

(a) General Industry 2 (GI2):

- Primary uses include industry, restaurant, service station, motor repair garage, funeral parlour, scrap yard, authority use, utility service, crematorium, telecommunication infrastructure, transport use, multiple parking garage, agricultural industry, private road, open space, filming and veterinary practice.
- Additional use rights include factory shop and adult shop, subject to specific development rules.
- Consent uses include abattoir, place of worship, institution, clinic, place of assembly, shop, office, sale of alcoholic beverages, place of entertainment, helicopter landing pad and container site.
- The GI2 zone permits a floor factor of 4, coverage of 75% and a maximum height of 20 m, except for manufacturing structures where no height restriction applies. Business premises are not permitted as of right, additional or consent uses, necessitating rezoning for the proposed development.

While part of the proposed land uses can be accommodated either as primary or consent uses in the GI2 zoning, there are components of the proposal that cannot, and rezoning is therefore required.

(b) Transport Use Zoning 1 (TR1)

- Primary uses include transport use, parking garages, utility services, shop, restaurant, service trade, office, warehouse and telecommunication infrastructure.
- Consent uses include business premises, flats, places of assembly, hotels, conference facilities, service stations, motor repair garages and industry, subject to the dominant transport use being retained.
- TR1 permits a floor factor of 2, coverage of 75% and a maximum height of 18 m. Given the scale and intensity of the proposed mixed-use development, a rezoning is required.

Components of the proposed development is not accommodated under the TR1 zoning and rezoning is therefore required.

(c) Transport Use Zoning 2 (TR2)

- Primary uses include public street, public road and utility services.
- Consent uses include informal trading and parking garages.

The proposed development is not accommodated under TR2 zoning and rezoning is therefore required.

2.4.2. Zoning justification: Site A – Mixed-Use Retail and Office component

Site A is envisioned as a movement-anchored, logistics-supportive mixed-use hub, strategically positioned adjacent to the rail corridor and newly enabled by the proposed road infrastructure (quarter-link) connection to Lower Church Street. The development comprises approximately 23 562 m² GLA, including:

- restaurants;
- a supermarket and neighbourhood-serving retail offering;
- shops bulky-goods and hardware retail aligned with industrial and construction supply chains;
- warehousing of a predominantly retail nature and potentially capable of supporting back-of-port logistics functions; and
- upper-level office or co-working space suited to administrative and support services.

Warehousing and restaurants are permitted as of use in the GI2 zoning. While “offices” and “shop” are listed as a consent uses under GI2. The GI2 Zone is limited in scope, as it does not permit supermarkets, and is not intended to accommodate an integrated retail–warehouse–office complex of this scale. Reliance on multiple consent uses would result in a fragmented regulatory framework, undermine long-term investment certainty, and restrict the site’s ability to evolve in response to market demand.

The Mixed Use Zone 2 (MU2) zoning is specifically selected because it:

- retains a floor factor of 4.0, equivalent to GI2, thereby preserving the existing bulk rights of the property;
- permits industry (including warehousing) as a primary use right;
- permits business premises as a primary use, including shops, supermarket, office, and restaurant within a single, coherent rights framework;
- allows compatible industrial and warehousing activities;
- provides height and coverage parameters suitable for a TOD-aligned inner-city site; and
- enables a flexible “basket of rights” approach, similar in regulatory flexibility (but not in function or scale) to mixed industrial–commercial precincts such as Paarden Eiland.

To achieve this outcome, the application proposes the rezoning of Erf 148639, Cape Town to Subdivisional Area in order to subdivide the property into five (5) portions as follows:

- Portion 1 (unapproved erf 184179 Cape Town) to TR1 (Railway Reserve);
- Portion 2 (unapproved erf 18480 Cape Town) to TR2: Public Road (Quaterlink);
- Portion 3 (unapproved erf 18481 Cape Town) to MU2 (Drive through Restaurant);
- Portion 4 (unapproved erf 18482 Cape Town) to TR2: Public Road (improve intersection of Beach Road and Railway Street); and
- Remainder Erf 14639 Cape Town to retain MU2 zoning (Warehousing, offices, shops, supermarket and associated parking, circulation and landscaping).

The proposal also ensures continued transport functionality and improved access while expanding economic and service provision within the Urban Inner Core.

2.4.3. Zoning justification: Site B – Housing component

Site B ($\pm 5\,263\text{ m}^2$) is proposed for a medium-density, socially inclusive residential development comprising approximately $15\,642\text{ m}^2$ GFA across a mix of studio, one-bedroom and two-bedroom units, supported by community facilities and landscaped open spaces. The housing component is supported by PRASA CRES.

Rezoning to MU2 is required as it:

- permits flats and community facilities as primary uses;
- provides appropriate height (25m / 30m under MPBL 2025) and coverage parameters;
- supports integration of ground-floor amenities;
- aligns with the Housing Act (1997), Social Housing Policy (2009) and SHRA guidelines;
- functions as a transitional interface between industrial and residential uses; and
- allows long-term adaptability.

MU2 zoning is consistent with the surrounding context south of Site B, where similar land uses and development parameters already apply.

Given Site B's location within the UIC and proximity to public transport, MU2 provides the most appropriate planning mechanism for affordable housing delivery.

2.4.4. Existing and Surrounding Land Use

The sites are currently derelict, underutilised and partially vacant, with remnants of previous industrial buildings and informal surface parking uses. Certain structures and boundary elements on the sites reflect their legacy as part of a railway and logistics precinct, with Site A's proximity to the railway reserve reinforcing this historical function.

Commercial and industrial land uses associated with site A include: service industries (laundry), wholesale and retail suppliers, video production and film industry support service providers, professional security services, building suppliers, boat building, machine and tool rentals, car rentals and repair services, and a cement batching plant on a part of Site B.

In the immediate south of Site A land uses include: boat building, stationary wholesale and retail suppliers, office furniture production and suppliers, film studios, and glazing design and supply to the construction. To the east of Site A services and commercial land uses include the City of Cape Town's waste depot and a marketing agency. To the north of Site B, land uses include: sound studios, audiovisual rental and supply, non-profit organization, printing, custom broker's offices, rope access specialists, glass engraving services, courier services and handbag manufacturing and factory shop. The southern line is located to the immediate south of Site B and to its east is the Transnet Freight rail site.

While a wide range of commercial and manufacturing land uses are present, that are not only focused on the maritime cluster, boat building and port activities. The activities also include wholesale and retail, office uses and professional services, the creative arts (film and music industry) service industrial uses and boatbuilding *inter alia*,

The surrounding urban fabric is mixed-use in character. To the south and west, developments along Lower Main Road and around Lower Church Street are characterised by retail outlets, commercial offices, small-scale warehousing, and residential infill, while the Transnet Rail Engineering complex and municipal depots are located the area to the east and northeast. The presence of established transport infrastructure, including the rail corridor and public bus routes, positions the site as a strategic location for intensification and urban infill.

2.5. Title Deed Conditions

The title deeds for both Site A and Site B have been reviewed, and, to date, no restrictive conditions have been identified that would impede the proposed rezoning or redevelopment of the properties. Full conveyancer's certificates (**Annexure F**) and copies of the respective title deeds are attached as **Annexure G**, confirming that the intended land uses and consolidation are not subject to any encumbrances, servitudes, or restrictions requiring removal or notarial amendment.

Where legacy servitudes exist (particularly those linked to historic rail or utility infrastructure), these are either obsolete due to previous consolidations or will be rationalised through the development process in consultation with the relevant authorities.

2.6. National Heritage Resources Act 1999 (Act 25 of 1999)

A preliminary heritage screening was undertaken under the National Heritage Resources Act (NHRA, 1999). The sites are not within a Heritage Protection Overlay Zone and have no formally declared heritage resources. The properties are not listed on SAHRIS.

In line with statutory protocols, a Notification of Intent to Develop (NID) was submitted to Heritage Western Cape. HWC confirmed that a Heritage Impact Assessment (HIA) that satisfies the provisions of Section 38(3) of the NHRA be submitted. Section 38(3) of the NHRA. HWC has specified that the HIA must include an Archaeological Impact Assessment (AIA) and a Townscape Assessment (See **Annexure H**). The HIA was submitted to HWC in July 2026.

3. URBAN PLANNING POLICY AND DIRECTIVES

3.1. Introduction

Cape Town faces increasing spatial and economic pressure to restructure its urban fabric in ways that enable inclusive growth, reduce inequality, and generate sustainable employment opportunities. As South Africa grapples with a deepening unemployment crisis—with a national rate of 32.9% and a staggering 70% among youth aged 15 to 24 - the need for catalytic development in strategically located, underutilised areas has never been greater.

The subject properties (Sites A and B) are located within the Urban Inner Core (UIC), a priority investment area identified for intensification, compact growth and Transit-Oriented Development (TOD). The sites are situated adjacent to established rail infrastructure and key activity corridors, positioning them strategically between the Cape Town CBD and the Port.

Despite this strategic location, the sites currently comprise fragmented, partially demolished and functionally obsolete industrial land parcels that no longer operate as viable freight-based industrial platforms. Their current condition and configuration do not reflect the operational characteristics envisaged by the City's industrial land protection policies, which are premised on large, contiguous and logistically efficient industrial precincts.

This section assesses the proposal against the City of Cape Town Municipal Spatial Development Framework (MSDF, 2023), the Table Bay District Spatial Development Framework (DSDF, 2023), and the Woodstock & Salt River Local Spatial Development Framework (LSDF, 2023). The analysis focuses on spatial strategy, including consolidation, integration and intensification.

To enable the proposal, a site-specific motivation for deviation from the industrial designations contained in the MSDF (particularly Policy P4) in terms of Section 9 of the MPBL and the DSDF and the LSDF is submitted in terms of Section 16 of the (MPBL), is required.

3.2. City of Cape Town Municipal Spatial Development Framework (2023)

The MSDF promotes a restructured, inclusive and efficient urban form through the consolidation, integration and intensification of land use within designated growth areas. Sites A and B are located within the UIC, a priority investment area identified for increased land use intensity, improved public transport accessibility and economic activity (see **Figure 6**).

Both sites fall within a Transport Accessible Precinct (TAP) and the Voortrekker Road Development Corridor. These designations support compact growth, mixed-use development, higher residential densities and integration with public transport systems.

The proposals comprise:

- **Site A:** A retail-led mixed-use employment node incorporating warehousing, light-industrial compatible space, offices, restaurants and neighbourhood-serving retail, supported by structured parking and activated public interfaces ('The Woodstock'); and
- **Site B:** A medium-density social and affordable housing precinct supported by community facilities, active ground-floor uses and landscaped public spaces ('The Lenah Residences').

The proposal does not preclude industrial activity. Instead, it enables the redevelopment of underperforming brownfield land while retaining flexibility to accommodate compatible logistical, industrial or port-related uses should future market demand arise.

3.2.1. Policy Deviation and Strategic Alignment

MSDF Policy P4 seeks to protect well-established and viable industrial land, particularly in proximity to the Port of Cape Town, to safeguard long-term economic competitiveness and support the oceans economy. The strategic importance of this objective is acknowledged.

Policy 4.1 seeks to discourage the re-purposing of general industrial 1 and 2 zoned land within the inner urban core. The policy states that these industrial nodes and precincts contribute to economic growth through primary and secondary value chains, such as the maritime cluster, boat building and port activities.

As noted in the description of current land use and activities on the subject properties and their surrounds, the industrial node at the Lower Church Street is already demonstrating diversification of land uses.

The MSDF spatial designation of the subject properties is industrial, and the proposed use of the subject properties is for mixed use development, application for deviation from the MSDF is required and motivation on site specific circumstances. The site-specific assessment below motivates that Sites A and B do not meet the functional, spatial or operational criteria envisaged by Policy P4. A managed transition to a mixed-use zoning framework is therefore justified and desirable.

a) Impact on neighbouring industries and the oceans economy

The proposed development will not compromise the operation of neighbouring industries, nor will it constrain the future expansion of port-related or ocean-economy activities, for the following reasons:

- The sites do not form part of a continuous or scalable industrial platform capable of accommodating modern freight-intensive activities;
- There is no direct or efficient freight linkage to the Port of Cape Town, national road network or highway system;
- No heavy industrial, manufacturing or port-logistics operations are currently active on either site; and
- Surrounding land uses are predominantly small-scale warehousing, service-industrial activities, some manufacturing and assembly, municipal depots and transitional mixed-use development rather than heavy industry.

In this context, the proposal does not sterilise strategic industrial land nor displace viable industrial activity. Large-scale port-related logistics and manufacturing functions are more appropriately located in areas such as Culemborg, Paarden Eiland, Salt River Freight Rail, Richmond Park, King Air Industria and Airport Industria, which offer superior land assembly, access, servicing capacity and operational efficiency aligned with the requirements of the Oceans economy.

b) Retention of industrial flexibility through MU2 zoning

The proposed deviation does not represent a loss of industrial capacity. The MU2 is intentionally selected to retain industrial flexibility over the longer term while enabling broader economic participation.

MU2:

- preserves a floor factor of 4.0, equivalent to GI2, thereby maintaining the site's existing bulk potential;
- permits industry as a primary use, including warehousing, service-industrial and light manufacturing activities;
- accommodates warehouse and trade-related buildings consistent with back-of-port support functions; and
- enables the Site A development to revert seamlessly to industrial use should future demand warrant such a shift.

The proposed zoning therefore broadens the range of economic and employment opportunity without undermining the City's strategic industrial land resource.

3.2.2. Local Economic Development and Precinct Character

In direct response to the City's economic development guidance for Woodstock and Salt River, the proposal deliberately avoids a mono-functional or conventional retail-centre typology.

The development framework provides for a layered mix of economic spaces, including:

- Warehouse and trade-related premises aligned with construction supply chains and back-of-port logistics support;
- flexible, smaller floorplates suitable for local businesses, artisans, service enterprises and light production;
- affordable rental commercial space to support emerging and locally rooted businesses; • ground-floor community-oriented spaces and opportunities for informal or semi-formal trade along primary pedestrian routes; and
- office and administrative accommodation supporting logistics operations, port-related services and the creative economy.

This approach reflects Woodstock's long-standing pattern of industrial–commercial hybridity, reinforcing local character and economic diversity, which is evident elsewhere in Woodstock.

3.2.3. Residential–Industrial Interface and Environmental Mitigation (Site B)

The proposal recognises the sensitivity of introducing residential uses within a historic industrial and logistics precinct and responds through a managed, evidence-based approach.

Key mitigation measures include:

- the spatial separation of residential development on Site B from heavier industrial interfaces;
- building orientation, setbacks and massing designed to buffer potential noise, dust and operational impacts;
- compliance with air quality, noise and environmental health assessment requirements;
- comprehensive geotechnical and environmental investigations to identify and remediate potential soil contamination; and

- design responses that ensure acceptable residential amenity without constraining lawful industrial activity on adjacent Transnet or PRASA land.

The MU2 zoning provides the necessary regulatory framework to manage this interface. Retaining GI2 or transport zoning would either prohibit residential development outright or fail to provide appropriate compatibility controls. The successful cohabitation of residential, commercial and industrial uses is evident throughout large parts of both Woodstock and Salt River, in areas where the Mixed Use zonings are dominant.

3.2.4. Pedestrian Environment, Safety and Public Realm

The proposal addresses the currently fragmented, vehicle-dominated environment through:

- continuous active edges along Beach Road, Lower Church Street and Railway Street where feasible;
- upgraded sidewalks, lighting and street-tree planting;
- landscaped public courtyards/areas and clearly defined pedestrian desire lines;
- passive surveillance through overlooking of NMT and IRT infrastructure; and
- a reduction of surface parking in favour of integrated or structured parking solutions.

These measures align with LSDF public-realm and safety priorities.

3.2.5. Density and Height Rationale

While higher densities are encouraged along development corridors, the proposal adopts a context-responsive density and height strategy that balances policy ambition with deliverability, in response to market demand. This approach:

- responds to rail servitudes, operational constraints and heritage considerations;
- mediates between surrounding industrial structures and existing residential development;
- ensures feasible construction and long-term management of affordable housing; and
- retains adaptability through MU2 bulk and height provisions (up to 30 m under the MPBL 2025).

3.2.6. Site Conditions, Environmental Constraints and Development Suitability

A preliminary geotechnical investigation (SRK Consulting (August 2025) – see **Annexure I**) confirms:

- a variable layer of uncontrolled fill averaging ± 1.7 m, including rubble and locally contaminated soils;
- remnants of historic railway infrastructure;
- shallow groundwater levels (± 1.6 – 2.6 m); and
- areas requiring specialist remediation.

These conditions undermine the viability of conventional industrial intensification under GI2 and reinforce that substantial remediation is unavoidable irrespective of land-use outcome.

Freight-intensive and heavy industrial uses typically require deep founding strata, large unobstructed yards and minimal remediation—conditions not present on the site. The geotechnical evidence therefore directly supports a deviation from MSDF Policy P4.

MU2 zoning responds appropriately by enabling:

- platform-based remediation and redevelopment;
- flexibility in building typologies and foundation solutions;
- phased development aligned with remediation requirements; and
- managed residential–industrial interfaces, particularly on Site B.

Unlike areas such as parts of Culembourg, the subject sites are being comprehensively remediated through a coordinated redevelopment proposal, rather than incremental, unmanaged change.

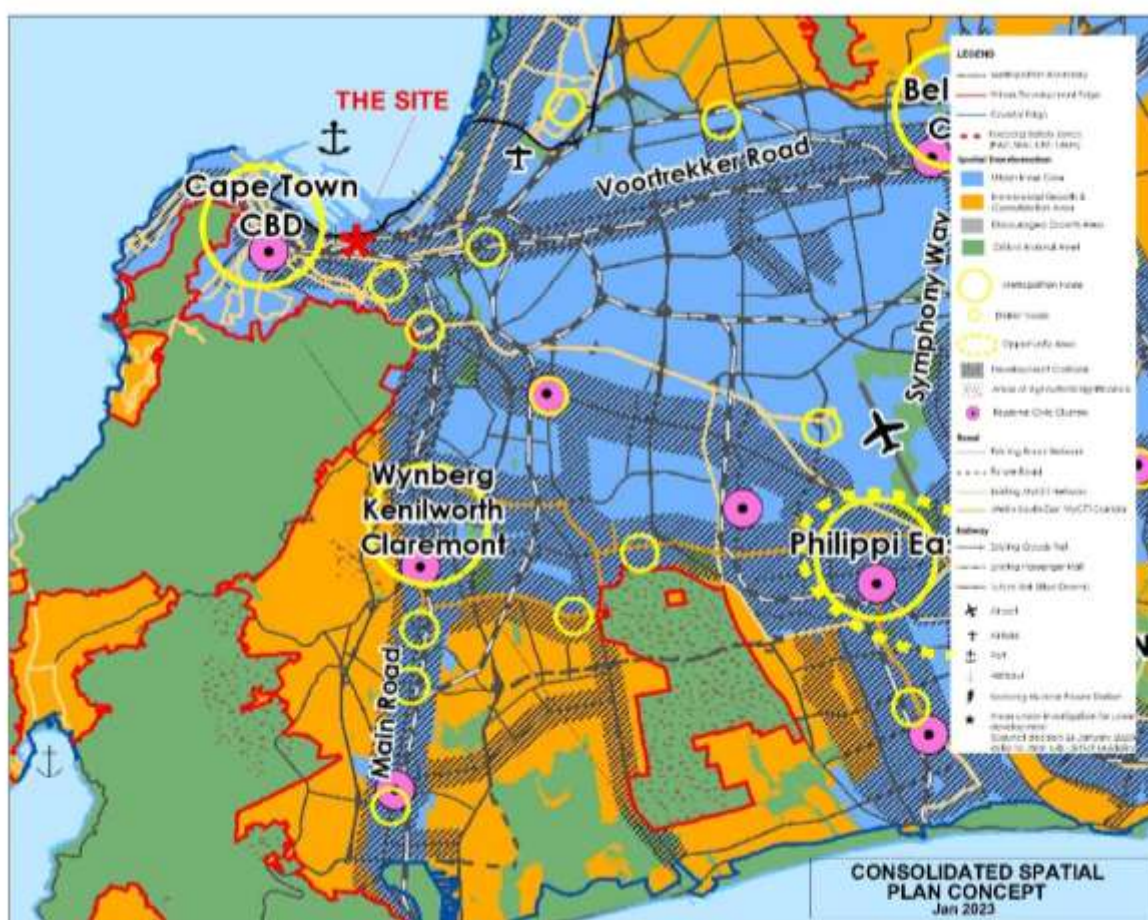


Figure 6: City of Cape Town Municipal Spatial Development Framework, 2023

Furthermore, the MSDF identifies parts of the site within a Precautionary Risk Area, specifically a floodplain (see **Figure 7**). The MSDF cautions against inappropriate development in such areas but does allow development where necessary, subject to risk mitigation and adaptation measures, including sustainable stormwater management and resilient building designs. With consideration of City’s Floodplain and River Corridor Management Policy, these are addressed as part of the civil services and stormwater management reports prepared for the application. Crucially, the site lies outside of the coastal edge and is unaffected by marine risk overlays, eliminating restrictions related to coastal protection regulations.

3.2.7. Alignment with Transformation and Inclusion Objectives

The proposal advances MSDF objectives through:

- Delivery of well-located social and affordable housing, thereby reducing transport costs and improving access to employment opportunities (see Section 9.2.4(a), *Socio-Economic Impact*).
- Warehousing, retail, service, and employment opportunities within a walkable, transit-accessible precinct, contributing to local economic diversification;
- Heritage-sensitive urban regeneration that preserves the site's character while delivering on the MSDF's goals for inclusive economic growth;
- Efficient use of existing infrastructure, with the TOD-supportive MU2 zoning enabling compact growth and reduced reliance on private vehicle travel.

The application represents a site-specific and evidence-based application of Policy P4 (see **Section 3.2.1**), where heavy industrial uses are neither feasible nor desirable.

3.2.8. Deviation from MSDF: Final remarks

The combined policy analysis, spatial context, zoning structure and geotechnical evidence confirm that:

- the subject land is no longer viable for conventional industrial intensification and already demonstrates a certain level of diversity, that is not aligned with Policy Directive P4.1;
- deviation from MSDF Policy P4 is justified, site-specific and evidence-based;
- MU2 offers the most appropriate and flexible planning response, without neutralising Site A for future industrial use in the longer term, should the market require it; and
- the proposed redevelopment supports economic resilience, social inclusion and spatial transformation of underutilised and derelict/vacant land.

The proposal therefore represents a managed, policy-aligned transition that safeguards strategic transport infrastructure, retains industrial flexibility and delivers substantial public benefit within the UIC.

3.3. Table Bay District Plan (2023)

The Table Bay District Spatial Development Framework (DSDF) articulates a spatial vision of

“an inclusive destination, providing more homes and opportunities to more people. An innovative district that becomes increasingly accessible and continues to offer a variety of economic opportunities, the benefits of which spread across the City. A resilient district where character areas, green spaces and cultural practices are celebrated.”

The DSDF promotes an inclusive, accessible and resilient district. While the sites are currently designated for industrial use (see **Figure 7 and Figure 8:**), the framework allows transformation where it advances compact growth and transport integration. The sites fall within Table Bay Sub-District 3, where the local spatial plan similarly indicates industrial use (see **Figure 8:**). The sub-district strategy emphasises preserving infrastructure capacity for industrial activity while allowing greater land use diversification where it does not undermine the viability of industrial sectors.

Notably, flexibility for land use transformation has been acknowledged in other transitioning precincts such as Maitland and parts of Ndabeni.

The proposal represents a formal deviation in terms of Section 16 of the MPBL.

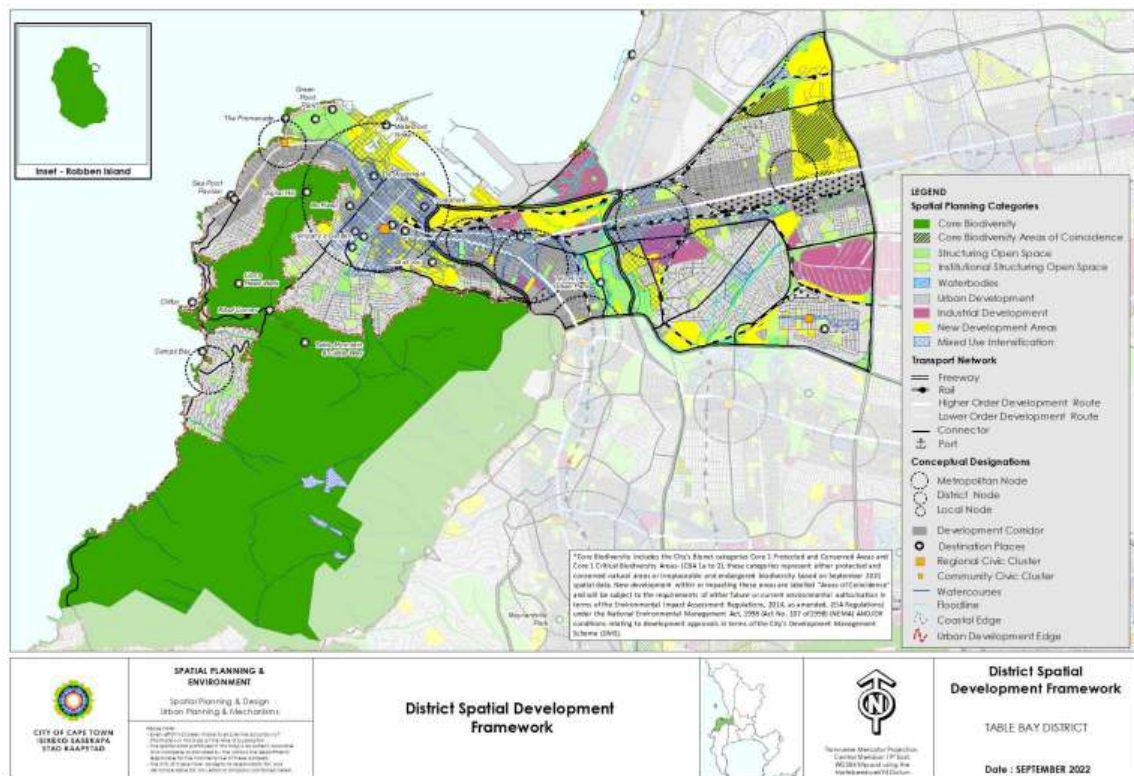


Figure 7: Table Bay District Spatial Development Framework

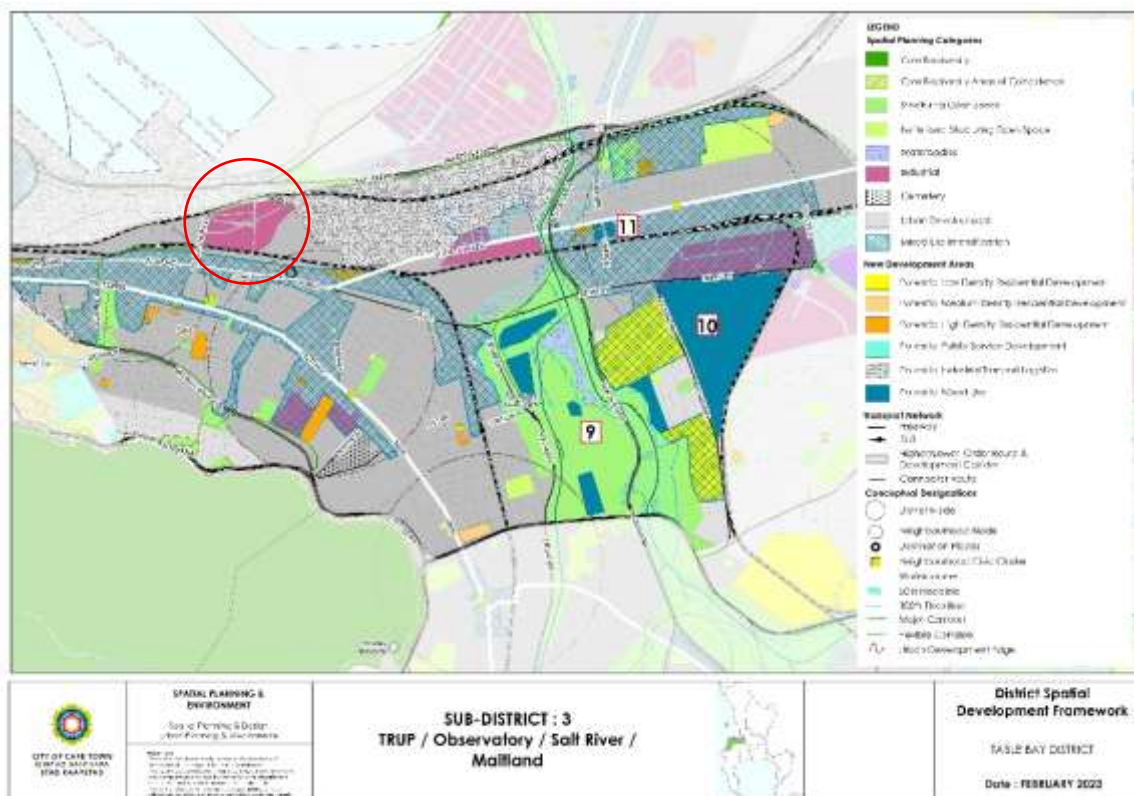


Figure 8: Table Bay Sub-District: 3

3.3.1. Policy Deviation and Site-Specific Motivation

While the Table Bay DSDF encourages the protection of well-located industrial land, the subject sites present unique spatial and operational constraints that justify transformation toward mixed-use development. The sites present unique spatial and operational constraints including fragmented access, limited freight suitability and adjacency to emerging mixed-use areas..

Accordingly, the deviation from both the MSDF (Policy P4) and the Table Bay DSDF industrial designation is site-specific and contextually motivated. The proposed rezoning to MU2:

- Does not displace any viable or operational industrial activity;
- Retains flexibility for compatible light-industrial or service-industrial uses within a mixed-use framework; and
- Advances higher-order spatial objectives for compact, inclusive, and transit-oriented growth within the Urban Inner Core.

3.3.2. Impact on Neighbouring Industries and Oceans Economy

The proposed development does not negatively affect or constrain existing industrial or port-related activity. MU2 allows future adaptability should marine-related services be required.

3.3.3. Policy Alignment within the District Framework

The proposal aligns with the broader objectives of the Table Bay DSDF, which include:

- Encouraging integration and mixed-use development along key corridors (Albert Road, Lower Main Road) in close proximity to the sites.
- Supporting infill development and land use intensification along the Albert Road–New Market Street axis to advance transport and spatial integration goals.
- Advancing affordable housing and urban consolidation in well-located areas within the Urban Inner Core.
- Unlocking underutilised, strategically located land to support economic and social regeneration without undermining industrial competitiveness in the district, which is better served by the Paarden Eiland node for freight-heavy industrial activities.
- The proposal does not negatively impact on the competitive advantage of industrial activities in the area.

3.3.4. Environmental and Infrastructure Considerations

The sites lie outside Green Infrastructure and Biodiversity Network overlays and are outside the 1:100-year floodplain per City informants (see **Figure 9:**). **Section 5.2.2** of this report details the stormwater and flood risk assessments prepared, confirming that risk-appropriate mitigation measures will be implemented to ensure the development's resilience. These findings are read together with the site-specific geotechnical constraints outlined in **Section 3.2.6**, which further reinforce the need for a managed, mixed-use redevelopment approach.

Although the proposal represents a formal deviation from the DSDF's industrial designation, it is strongly aligned with the district's core principles of compact city growth, urban regeneration,

improved access, and inclusive development. The deviation is therefore well justified, supported by:

- Demonstrated site-specific constraints on heavy industrial viability;
- Strong alignment with higher-order MSDF policies prioritising intensification within the UIC;
- Retention of industrial flexibility under MU2; and
- Conformity with the emerging development patterns of the Woodstock–Salt River corridor.

The proposal thus ensures that the site contributes constructively to the district's long-term spatial, economic, and social objectives while respecting the intent of the DSDF.

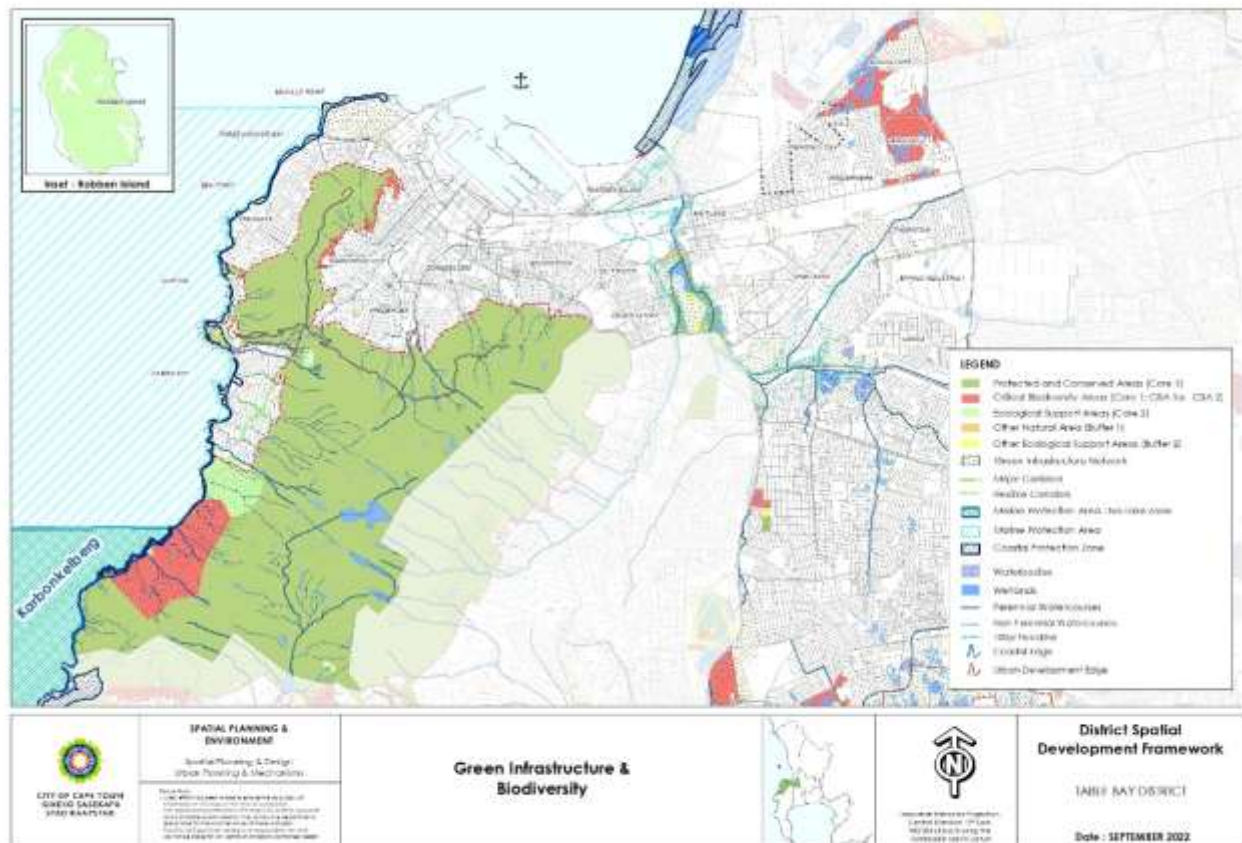


Figure 9: Green Infrastructure and Biodiversity

3.4. Woodstock & Salt River Local Spatial Development Framework (2023)

The Woodstock & Salt River Local Spatial Development Framework (LSDF, 2023) provides a localised policy layer aligned with the City of Cape Town's Integrated Development Plan (IDP) and Municipal Spatial Development Framework (MSDF). The LSDF positions Woodstock and Salt River within the UIC, identifying the area as a priority for investment, compact urban growth, and social transformation.

The spatial designation of the subject properties is industrial (**Figure 10**). The proposal therefore represents a formal deviation from the LSDF in terms of Section 16 of the MPBL.

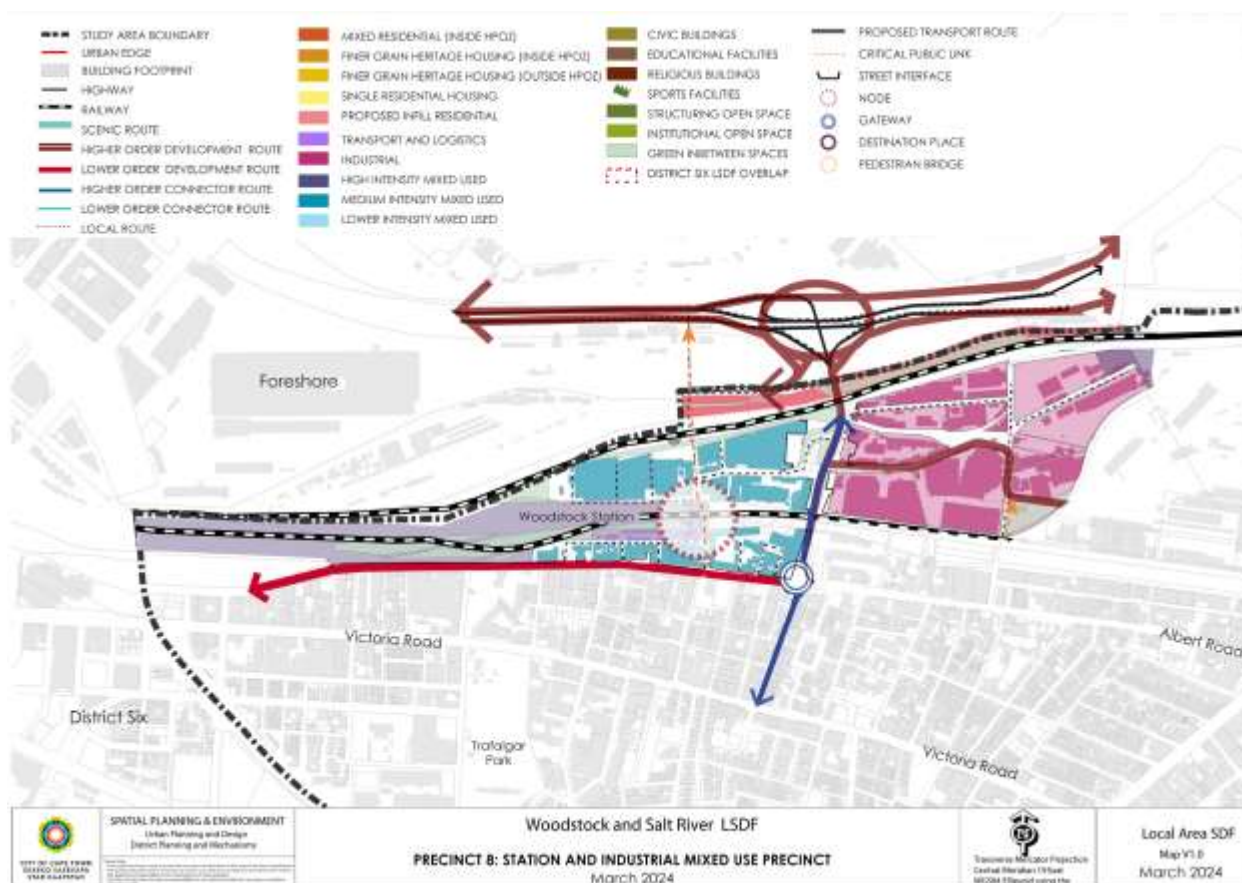


Figure 10: Woodstock Saltriver LSDF: Precinct 8

3.4.1. Policy Context

The LSDF supports:

- Providing a variety of spaces for a diverse mix of businesses including emerging small and medium enterprises and informal or transitory trade such as weekend markets.
- Prioritising walking, cycling, and public transport to reduce reliance on fossil fuels. Developments should be designed to be adaptable and accommodate future needs.
- Mixed-use intensification and redevelopment within TOD nodes and along key corridors.
- Infill development and densification within walkable, well-located precincts.
- Regeneration of underutilised and fragmented sites to support housing delivery and economic participation.
- Development of a variety of housing options throughout Woodstock and Salt River to cater to different needs and income levels. Prioritize the creation of affordable housing options near public transport and amenities.
- Integration of heritage assets in redevelopment initiatives, preserving local character while enabling urban transition.
- Improved public realm and NMT (Non-Motorised Transport) linkages within the precinct.

The LSDF explicitly notes:

“There are pockets around New Market Street, Brickfields Road, and the area between Durham and Salt River Road that are suited to higher levels of mixed-use intensification... The areas around the train stations and PRASA properties are priorities for redevelopment and intensification.” (LSDF, Vol. 2, p. 44), while considering the character of the surroundings.

3.4.2. Alignment of Proposal with LSDF Objectives

- **Strategic Location for Intensification**

The sites are located within the LSDF’s Station and Industrial Mixed Use Precinct, adjacent to Woodstock Station and major MyCiTi and rail corridors, making them ideally positioned for TOD-aligned, mixed-use intensification.

- **Economic Development**

The LSDF supports a mix of land uses in keeping with the current mixed-use distribution and avoiding exposure of residential land use to higher risk industrial areas. The proposal supports the principle of mixed-use development, and as set out earlier in the report, the area is not characterised by higher risk industrial activity and the development can be accommodated within its immediate context. While the LSDF notes the need to protect well-located industrial land, the subject sites’ fragmented layout, limited truck access, and constrained size make them ill-suited for large-scale freight-based industrial uses better located in Paarden Eiland. Further, the proposal seeks to retain and repurpose of heritage significance.

The MU2 zoning retains the flexibility for light and service industrial uses within a mixed-use precinct, ensuring the area’s long-term adaptability while prioritising strategic regeneration. The principle of providing for a diverse range of business rental premises, is supported by the MU2 zoning, in association with high traffic retail represented by the supermarket and DIY, building, deco and gardening retail warehouse.

- **Environment**

The the improvement to the quality of the urban environment, through greening, as well as the creation of green networks is fundamental to the vision for the area. A building’s use should relate to the public space adjacent and spill-out into the public space. The repurposing of heritage buildings to be retained for potential restaurants, with extended pavement areas that can accommodate outdoor seating responds to this principle. Landscaping of the site will enhance greening of the precinct and includes improved stormwater management integrated into the landscaping of the precinct. Landscaping of the development is appropriate for local conditions and planting will be selected to sustain the impacts of weather events and climate change.

- **Mixed-Use and Housing Delivery**

The LSDF prioritises providing affordable housing and a mix of land uses in well-located areas to support inclusive growth. The proposed development of Site B as a social and affordable housing precinct responds directly to the LSDF’s identification of reduced affordable housing in Woodstock as a constraint on spatial transformation. The initiative is private sector initiative that has the potential to affordable housing with a mixed typology of units for rental in the affordable income band. Its location directly at the western footing the Railway Street pedestrian bridge over the southern railway line provides direct pedestrian access to Albert Road and the Dublin bus stops.

The proposed Site A retail-led mixed-use node aligns with the LSDF's vision to support employment and retail opportunities within the precinct while maintaining flexibility to accommodate light industrial activities should market demands arise.

- **Heritage and Urban Design Integration**

The proposal will incorporate and celebrate heritage structures on-site while upgrading the pedestrian environment in line with the LSDF guidelines. Rather than large-scale freight-based industrial development that could undermine the precinct's heritage fabric, the proposed approach will preserve and enhance these structures within a viable, activated urban context.

- **Public Realm and NMT Improvements**

The LSDF calls for improved pedestrian linkages and active street edges along Beach Road and Lower Church Street. The proposed development will deliver structured public spaces, improved sidewalks, street furniture, and landscape elements that enhance walkability and create a safe, attractive urban environment. The proposed development will improve pedestrian safety through

The Woodstock & Salt River LSDF provides clear, precinct-specific policy support for the proposed development of Sites A and B, demonstrating that:

- The sites are priority locations for TOD-aligned, mixed-use intensification, being within 400 m of Woodstock (IRT), Davidson, Lower Church and Dublin bus stops, and Woostock Station.
- The proposals align with housing delivery, economic regeneration, and inclusive growth goals.
- Redevelopment will activate underutilised land while integrating heritage resources.
- The approach avoids the displacement of viable industrial activities better suited elsewhere while retaining industrial flexibility under MU2.

The LSDF thus serves as a critical supporting policy framework for the proposed rezoning, consolidation, and deviation application, ensuring that the development meaningfully advances Cape Town's spatial transformation objectives while respecting and leveraging the unique characteristics of the Woodstock and Salt River precinct.

- **Station and Industrial Mixed Use Precinct**

The project is located within Precinct 8 of the LSDF: Station and Industrial Mixed-Use Precinct. The LSDF notes that while there is less interest in property redevelopment, however underutilised buildings and land parcels remain substantial future development opportunities, which opportunity the current proposal is responding to. The proposal is located on PRASA properties that are identified in the LSDF as priorities for redevelopment, with the Lower Church Street yards being suitable for intensification of both industrial and commercial uses.

Section 9(5) of the MPBL notes state that *"If there is a conflict between the municipal spatial development framework and a district spatial development framework or local spatial development framework, the municipal spatial development framework prevails to the extent of the conflict."* Site B is indicated as *"Green Inbetween Space"* which is in conflict with the MSDF and DSDF industrial designation. The historic and current use, as well as the zoning of Site B is more closely aligned with the spatial designation of both the MDSF and the DSDF, and hence the deviation from industrial applies to this development parcel.

3.5. Inclusive Economic Growth Strategy (2021)

This section should be read in conjunction with the MSDF, DSDF, and LSDF policy context, which collectively support strategic land use intensification while maintaining flexibility for employment-generating uses within well-located mixed-use precincts. The City of Cape Town's Inclusive Economic Growth Strategy (IEGS) presents a coordinated framework for fostering a resilient and inclusive economy. It emphasises the need for collaboration between government, business, and civil society to create the conditions necessary for business growth, job creation, and economic participation. The IEGS recognises that inclusive economic growth is closely linked to spatial transformation.

The proposed redevelopment of Sites A and B supports the IEGS by:

- Activating well-located land: The sites are positioned in a high-opportunity zone for economic revitalisation and improved access to jobs.
- Supporting enterprise development and job creation: Site A will accommodate a mix of retail formats (including warehousing), offices that could be used for back-of-port, logistical support, and commercial services, contributing to economic diversification and creating space for a range of business types, including small and medium enterprises.
- Promoting inclusive growth through integrated planning: By incorporating residential, commercial, and public realm components into a single development vision, the proposal addresses both the spatial and socio-economic barriers that have historically excluded lower-income groups from central urban opportunities.
- Leveraging public and private investment: The scale of the investment and the long-term development vision for Sites A and B will contribute to area-based regeneration, strengthen the municipal rates base, and stimulate further investment in the surrounding precinct.

3.6. Social Development Strategy (2013)

The proposed redevelopment of Sites A and B supports the SDS through a range of spatial and programmatic interventions aligned with its five high-level objectives, as follows:

- Maximise income-generating opportunities for people who are excluded or at risk of exclusion*

The development will generate both short- and long-term employment opportunities. During construction, local labour will be prioritised, especially through partnerships with contractors and emerging enterprises. Post-construction, the retail component will provide permanent jobs across various skill levels in customer service, retail operations, facilities management, and logistics. The inclusion of small-format retail and service spaces also offers opportunities for entrepreneurship and informal trading.

- Build and promote safe households and communities*

The layout and design of both sites integrate urban safety principles, including active street edges, surveillance-friendly public spaces, well-lit pedestrian pathways, and clear wayfinding. The inclusion of structured public realm elements - such as the central piazza on Site A and landscaped courtyards on Site B - promotes social interaction and improves safety. The provision

of dignified housing near transport, jobs, and services on Site B further supports long-term household stability.

iii. Support the most vulnerable through enhancing access to infrastructure and services

The housing component on Site B targets lower-income households, including those in need of social and affordable rental accommodation. The site will be fully serviced, with connections to municipal infrastructure, and located within walking distance of key transport routes. While no clinics or libraries are proposed within the development itself, the proximity to broader Woodstock and Salt River social amenities ensures enhanced access to healthcare, education, and community services for residents.

iv. Promote and foster social integration

The development proposal actively supports socio-spatial integration in a historically fragmented area.

v. Mobilise resources for social development

This project represents significant private-sector investment in public-facing infrastructure—such as new roads, parking, green space, and housing. This capital investment will have spill-over benefits for the surrounding community and may catalyse future public-private partnerships. It also strengthens the local rates base, enabling the City to reinvest in broader urban and social development initiatives in the district.

3.7. City of Cape Town Densification Policy (2012)

The Densification Policy was formulated in response to the long-term sustainability challenges posed by continued low-density urban expansion. Densification is defined as *“the increased use of space both horizontally and vertically within existing areas/properties and new developments accompanied by an increased number of units and/or population thresholds.”*

The proposed development of Site B - for medium-density social and affordable housing - and the potential for future mixed-use vertical expansion on Site A, directly aligns with this policy's objectives. The sites are in a highly accessible urban area, adjacent to public transport, and within an existing infrastructure-serviced precinct, making them ideal candidates for strategic intensification. The policy outlines several spatial, social, and environmental benefits associated with densification, many of which are embedded in the proposed development:

- Optimising the use of existing infrastructure;
- Enhancing economic opportunity by increasing foot traffic and supporting local retail;
- Improving housing diversity and unit typology choice;
- Supporting compact, walkable neighbourhoods;
- Contributing to place-making through coordinated built form and public realm design.

3.7.1. Key Policy Alignment:

- *DP1 – Targeting 25 dwelling units/ha*

The proposed development on Site B will deliver a medium-density residential precinct with a gross density that meets or exceeds the City's minimum target of 25 dwelling units per hectare, in line with DP1 of the Densification Policy. Final unit numbers will be determined during detailed

design, allowing flexibility to respond to market conditions and housing partnership requirements while ensuring that the policy's long-term city-wide goals for sustainable, transit-oriented densification within the Urban Inner Core are met.

- *DP2 – Promote densification in all areas, with higher intensity in accessible locations*

The proposed development is located within the UIC, a TAP, and adjacent to key employment zones. This is not “small-scale incremental” densification, but rather strategic infill intensification at a scale that enables affordability and infrastructure efficiency.

- *DP5 – Promote a variety of erf and dwelling sizes*

The proposed housing (flats) will include a range of apartment typologies, contributing to tenure diversity and housing choice. While erf-based development is not the model here, the proposal supports the intent to transition from low-density suburban layouts to more urban, compact forms.

- *DP6 – Use design guidance for height, form and scale*

The proposal is supported by an emerging urban design and massing framework that considers local context, scale transitions, and street interface, in line with the design principles recommended in the policy. Care will be taken in the future building plan submission(s) to align built form with urban performance, heritage sensitivity, and movement networks. The proposed redevelopment of Site B for social and affordable housing, and the anticipated mixed-use intensification potential of Site A, are strongly supported by the Densification Policy.

3.8. Integrated Public Transport Network (IPTN) Plan

The City of Cape Town's Integrated Public Transport Network (IPTN) Plan aims to establish a seamless, safe, affordable and accessible public transport system across the city by 2032. Central to this vision is the development of TOD nodes and corridors that co-locate higher-density housing, retail, employment and public amenities within walkable distances of public transport infrastructure. The proposed redevelopment strongly aligns with the objectives and strategic intent of the IPTN Plan in the following ways:

i. Location within a Strategic Public Transport Corridor

The sites are located along the Voortrekker Road corridor, within the UIC, and in close proximity to the Woodstock and Salt River railway stations, which are identified as key nodes in the City's rail-based public transport network. These areas are also well-served by existing MyCiTi Phase 1 trunk routes and Golden Arrow bus services, and fall within a designated PT2 area under the City's Development Management Scheme.

The IPTN Plan prioritises investment in corridors that integrate rail, bus rapid transit (BRT), minibus taxis, and non-motorised transport (NMT) infrastructure to serve high-density urban precincts. The proposed development contributes to the realisation of this objective by intensifying land use in an area already earmarked for multi-modal transport integration.

ii. Supports Transit-Oriented Development Principles

The IPTN Plan supports densification, mixed-use development, and reduced car dependency in areas with good transport access. The proposed development TOD principles through:

- Site B: Affordable residential opportunities close to multiple transport modes;

- Site A: Promote socio-economic activity;
- An internal layout and movement network that prioritises walkability, universal access, and safe delivery logistics, while maintaining permeability to the surrounding street network.

Additionally, parking on Site A has been designed in accordance with TOD principles: while sufficient for commercial viability, it avoids excessive provision, encouraging alternative transport modes where feasible.

iii. Integration with Non-Motorised and Public Transport Infrastructure

The development makes provision for pedestrian-friendly interfaces along Beach Road, Lower Church Street, and internal connections such as Tide Street, which will remain a key circulation and logistics route. These interventions support the IPTN goal of first- and last-mile connectivity, enabling safe and legible movement between residences, workplaces, and nearby public transport nodes. The proximity of both sites to public transport interchanges and walking routes significantly reduces the need for private car use, which aligns with the IPTN's environmental and equity objectives.

iv. Contributes to Spatial Equity and Access to Opportunity

By introducing social and affordable housing in a highly central, historically underutilised location, the development directly supports the IPTN's objective of enhancing spatial equity. The plan recognises that affordable access to well-located public transport and urban amenities is essential to redress the spatial legacy of apartheid planning.

Residents of Site B will benefit from proximity to employment centres in the CBD, Paarden Eiland, and Observatory, as well as nearby schools, clinics, and retail services. The proposal aligns with the City of Cape Town's IPTN Plan, supporting its core objectives of:

- Densification along strategic public transport corridors;
- Development of inclusive, transit-oriented precincts;
- Improved access to economic and social opportunities; and
- Integration of housing, employment, and services in proximity to multi-modal transport infrastructure.

By enabling more equitable and sustainable mobility patterns, the development contributes meaningfully to the City's long-term vision of a connected and accessible Cape Town.

4. THE DEVELOPMENT PROPOSAL

The application proposes the rezoning, subdivision, consolidation and phased redevelopment of two interrelated land parcels in Woodstock, namely Erf 148639 (Site A) and Erven 10221, 10223, 10224, 10225, 149351 and 149348 (Site B), to establish a mixed-use precinct comprising retail, employment-generating uses and social and affordable rental housing.

The proposal seeks to redevelop currently underutilised land into an integrated urban precinct that accommodates a mix of commercial, residential and community-supportive uses within a TOD framework. The development concept is structured to allow flexibility in land use under the proposed MU2 zoning, including the retention of compatibility with surrounding light industrial and logistics-related activities.

The proposed development is subject to a 40-year lease agreement with PRASA. The relatively short timeframe of the lease is a key consideration w.r.t. the financial feasibility of the project and influences the relative level of development intensity the project illustrated on the development plan, in particular for Site A, the commercial precinct.

4.1. Site A: Retail and Mixed-Use Anchor ('The Woodstock')

Site A (Erf 148639 Cape Town) functions as the commercial and mobility-focused component of the precinct. The site is bounded by Beach Road, Lower Church Street, Railway Street and the railway reserve and measures approximately 63 493 m².

The proposed development accommodates a total Gross Lettable Area (GLA) of approximately 23 562 m², comprising (see Error! Reference source not found.):

- ±10 000 m² trade-related retail and warehousing;
- ±3 500 m² food-based retail (supermarket and daily convenience retail);
- ±10 062 m² supporting retail, service and lifestyle uses, including offices and co-working space of approximately 5 300 m² on the first and second floors, which provides flexible use and increases affordability.

The buildings range from large box warehouse structures, supported by smaller buildings (including buildings to be retained) and commercial spaces that can accommodate a range of business and commercial requirements.

The layout achieves a site coverage of approximately 30% and a Floor Space Ratio (FSR) of 0.372, providing a balance between built form and open space.

A total of 719 parking bays are provided in at grade and structured parking, equating to approximately 3.05 bays per 100 m² GLA. This exceeds the Development Management Scheme (DMS) baseline requirement of 701 bays (3 bays per 100 m² GLA).

While the LSDF promotes more intense land use at surface level, the at grade parking provision is provided in response to market demand, in particular to accommodate the high traffic demand anchors, that improve the financial viability of smaller enterprises. With restaurants proposed to face onto the space with extended sidewalk space to allow for outdoor seating and, the potential exists to activate the space for a range of activities, including outdoor markets.

4.1.1. Public Realm and Circulation:

- The public interface includes activated pavement areas and landscaping, framed by retail frontages along Beach Road and internally with continuous pedestrian arcades and landscaped walkways.
- The retention of buildings of heritage significance on Beach Road frame both the external street and internal parking court.
- Extended pavement areas at the intersection of Beach Road and Railway Street creates opportunity for less formal trading space and in conjunction with the corner retail building creates the opportunity for an activated corner in this location.
- Tide Street is retained as an internal logistics corridor, upgraded to accommodate delivery vehicles beneath the proposed off-ramp while maintaining pedestrian safety.
- A future right-of-way servitude will be required in favour of the City of Cape Town to enable the construction, operation and long-term maintenance of the proposed Church Street quarter-link traversing Portion 2 of Erf 148639.
- While detailed design and the geometric layout is well advanced for the Church Road quaterlink, registration of the servitude will occur as a condition of approval or post construction, as required by the City.
- Street trees, seating and urban landscape elements will be introduced to support a pedestrian-oriented public realm, as well as to enhance the micro-climate of the area.
- A Landscape Plan prepared by the appointed landscape architect (**Figure 14**) sets out greening, shading and pedestrian linkages between Sites A and B.

4.1.2. Urban Design Narrative – Site A

Site A is framed by structures including both existing and new build. The architectural approach is informed by the historic rail and industrial character of the precinct. The design is contemporary but contextual, acknowledging the layered history of the site while establishing a distinct identity for the future (See **Figure 17**).

- **North (M176 Frontage)**

The northern edge responds to its high-visibility context. Anchor tenant massing is articulated to avoid a singular monolithic form. Variations in scale and proportion reference the rhythm of rail infrastructure and industrial sheds. Robust materials reinforce the industrial narrative. The removal of outdated structures improves legibility from the M176.

- **Southern edge**

Existing structures are retained where feasible and incorporated into the development, and in the main frame Beach Road. Façade articulation balances visual presence with contextual sensitivity. Massing is modulated to reduce perceived bulk and respond to the surrounding urban grain. Structural expression and framed openings draw from industrial precedents.

- **Tide Street Interface**

Building alignment has been shifted northward to mitigate archaeological sensitivities. This adjustment allows retention of a strong urban edge while respecting historic layers.

- **Craig's Tower**

Craig's Tower is conceived as a contemporary reinterpretation of the former Craig's Battery. It functions as both a landmark and amenity element within the precinct. Its form and detailing reference industrial heritage and reinforce the historical narrative of the site.

It should be noted that the site is bounded by the elevated Church Street Bridge and the proposed new quarter-link to the south, and limited opportunity exists to activate this edge. The gabled buildings to be retained look out onto a new terrace proposed to be utilized as landscaped seating area. Buildings to be retained on Beach Road are located close to the road edge, and while fenestration looks out onto the street access and activation is emphasized on the internalised parking court. To the north of the site the area is dominated by railway lines and with the retention of the structures on Beach Road, the proposal frames the space and draws visitors into the space bounded by activated edges and fenestration, of the internal public realm. While it is proposed to activate the Beach Road/Railway Street corner of the site, planting and landscaping define the interface treatment along the street edge.

4.2. Site B: Social and Affordable Housing ('The Lenah Residences')

Site B ($\pm 5\,263\text{ m}^2$ following consolidation) is designated for medium- to high-density social and affordable rental housing, to be delivered in partnership with an accredited social housing institution.

The development is based on concept designs prepared by Jakupa Architects and will generally accord with the submitted drawings (see **Figure 15** and **Figure 16**).

Key parameters include:

- Maximum building height of 25 m (excluding a 2 m lift overrun);
- 5 m street setback;
- Approximately $11\,135\text{ m}^2$ total floor area (floor factor 2.12);
- 9 storeys;
- Site coverage of approximately 34% ($\pm 1\,770\text{ m}^2$ footprint).

The ground floor accommodates:

- management offices;
- refuse and service areas;
- transformer room;
- internal service road;
- parking;
- landscaped courtyard and play park.

Typology and Design:

The building is designed as a walk-up apartment typology around a central landscaped courtyard. Unit sizes range from approximately 30 m^2 to 55 m^2 , catering for diverse household needs while remaining compliant with SHRA requirements.

The design priorities:

- improved interface with Railway Street edge through landscaping and boundary treatment;
- passive surveillance from street facing windows, in particular onto Railway Street, as well improved lighting along railway street to improve safety of both the residents and public utilizing Railway Street;
- setback from the Transnet access road to the north of the site;
- universal accessibility;
- durable, low-maintenance materials appropriate for long-term rental housing;

4.3. Landscaping and Connectivity:

The Landscape Plan (**Figure 14**) establishes a green, pedestrian-friendly environment with the following philosophical approach:

- Located in light industrial zone, on the fringes of Woodstock neighbourhood and adjacent to the N1 freeway, the site is rich in history but with little redeeming landscape features. The proposed development of a retail centre and associated amenities provides an opportunity to breathe new life into the space.
- The landscaping is primarily designed to fragment the built form with structure planting of trees throughout the parking areas along with strategic tree planting at the main entrance, and in café spill-out zones to provide a shaded canopy. Understorey planting of hardy and robust shrubs and groundcovers which are adapted to the site conditions will add a further layer of greening.
- In areas where space may be constrained either in width or due to existing or planned below ground civil services, hedge planting fulfils a structuring function in place of trees.
- On-site stormwater attenuation ponds will be planted with material from the Sustainable Urban Drainage System (SUDS) plant list which offer provide a cleaning and polishing function, adding further greening over civil infrastructure.
- Hard landscape elements including benches, raised planters and pedestrian zones identified by change of paving materials provide legibility to the space with the aim of slowing vehicular traffic and prioritising pedestrian flow.
- The space must ultimately enable a pleasant environment for pedestrians while serving the primary retail function. Tree planting in structured cut-outs and freestanding planters;
- Landscape screening, through tree planting on the edges of the site and landscaped outdoor space, to shield residents from the railway infrastructure to the south-east, the new Transnet access link to north and along Railway Street, and potential future redevelopment of the Transnet site to the east for back of port activities;
- Pedestrian links connecting Site B to the commercial precinct on Site A and to surrounding transport infrastructure.

Existing trees have been mapped for potential retention, removal, or transplanting pending the outcome of the formal tree survey.

These interventions contribute to microclimate comfort and assist in mitigating dust and air-quality impacts from surrounding industrial activities.

4.4. Movement

The precinct is structured to support safe, legible and universally accessible movement.

- Active frontages along Beach Road, Lower Church Street and internal routes enhance natural surveillance.
- Pedestrian priority is reinforced through landscaping, lighting and street furniture (see Error! Reference source not found.).
- Non-motorised transport (NMT) routes are integrated throughout the site.
- Vehicular access is designed to accommodate general traffic, servicing and emergency vehicles.
- Tide Street is retained in part as a logistics route beneath the off-ramp to minimise conflict with pedestrian areas.

Departures will be sought to allow:

- more than one carriageway crossing on Beach Road and Railway Street; and
- increased crossing widths where required.

A phased construction approach will ensure continued accessibility, with appropriate screening, wayfinding and pedestrian detours.

4.5. Basket of Rights Approach

To future-proof the precinct and align with the City's objectives for operational efficiency and reduced amendment processes, the proposed rezoning will secure a basket of rights under the MU2 zoning. This will allow for a flexible mix of uses- including residential, commercial, and compatible light industrial activities - within the defined height, coverage, and floor space parameters. This approach will ensure that the precinct can adapt to evolving market, economic, and community needs while retaining the potential for industrial activities if warranted, without undermining the integrity of the emerging mixed-use urban fabric in Woodstock.

To assist the decision-maker in understanding the spatial intent and functional integration of the proposal, a Development Concept Plan accompanies this motivation.

This plan is not a Site Development Plan (SDP) for approval, nor does it constitute binding development rights. Instead, it illustrates key structuring elements of the proposal, including:

- indicative movement and access arrangements (vehicular, NMT, and public transport);
- broad land use disposition, building envelopes, and height transitions;
- public realm and landscaping intentions; and
- integration between Sites A and B, particularly pedestrian permeability and spatial legibility.

The Development Concept Plan supports the motivation and may inform any future conditions of approval, but all final compliance details—including detailed landscaping, engineering design, parking layout, façades, and service planning—will be submitted at the building plan stage.

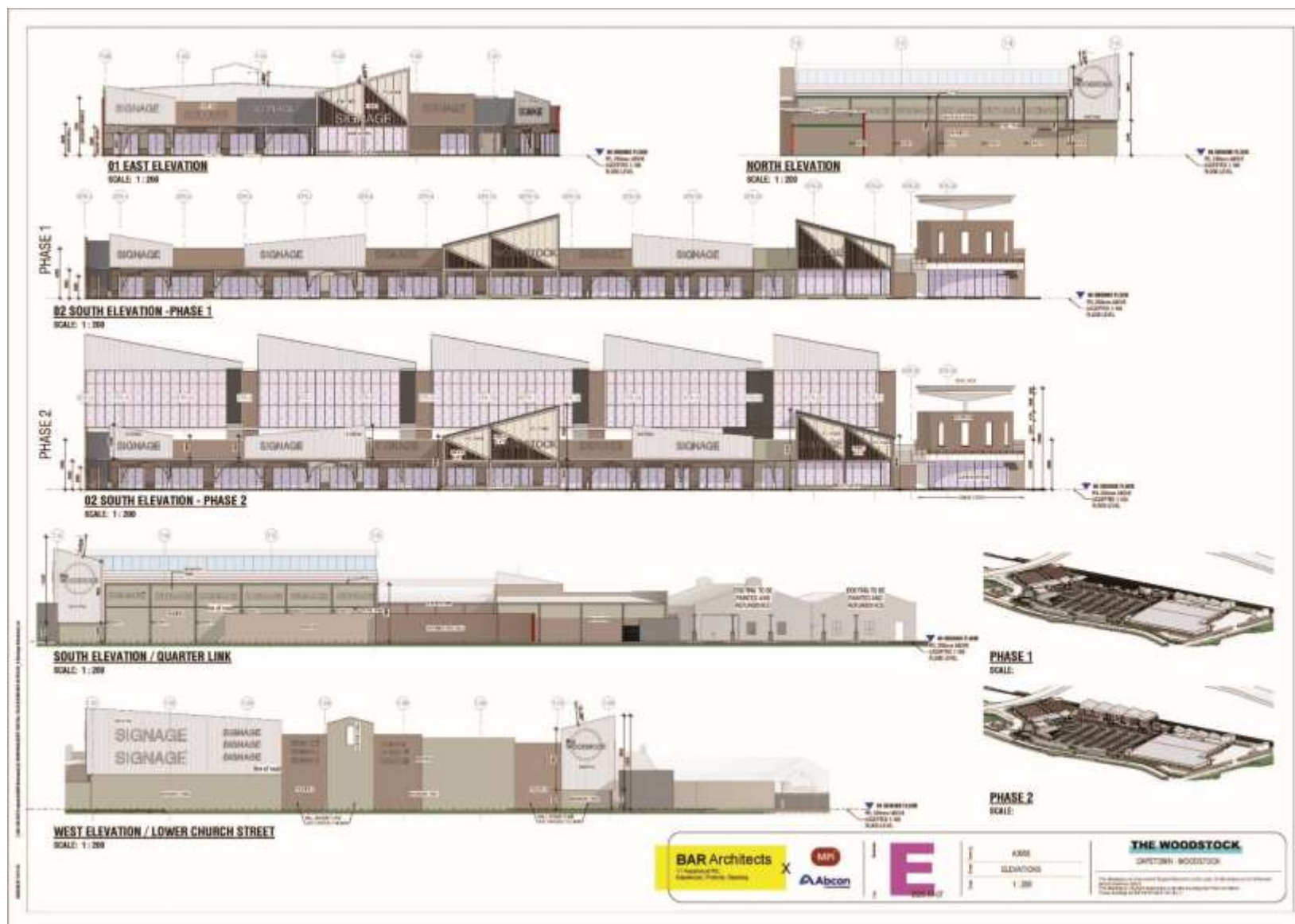


Figure 12: Elevations Site A

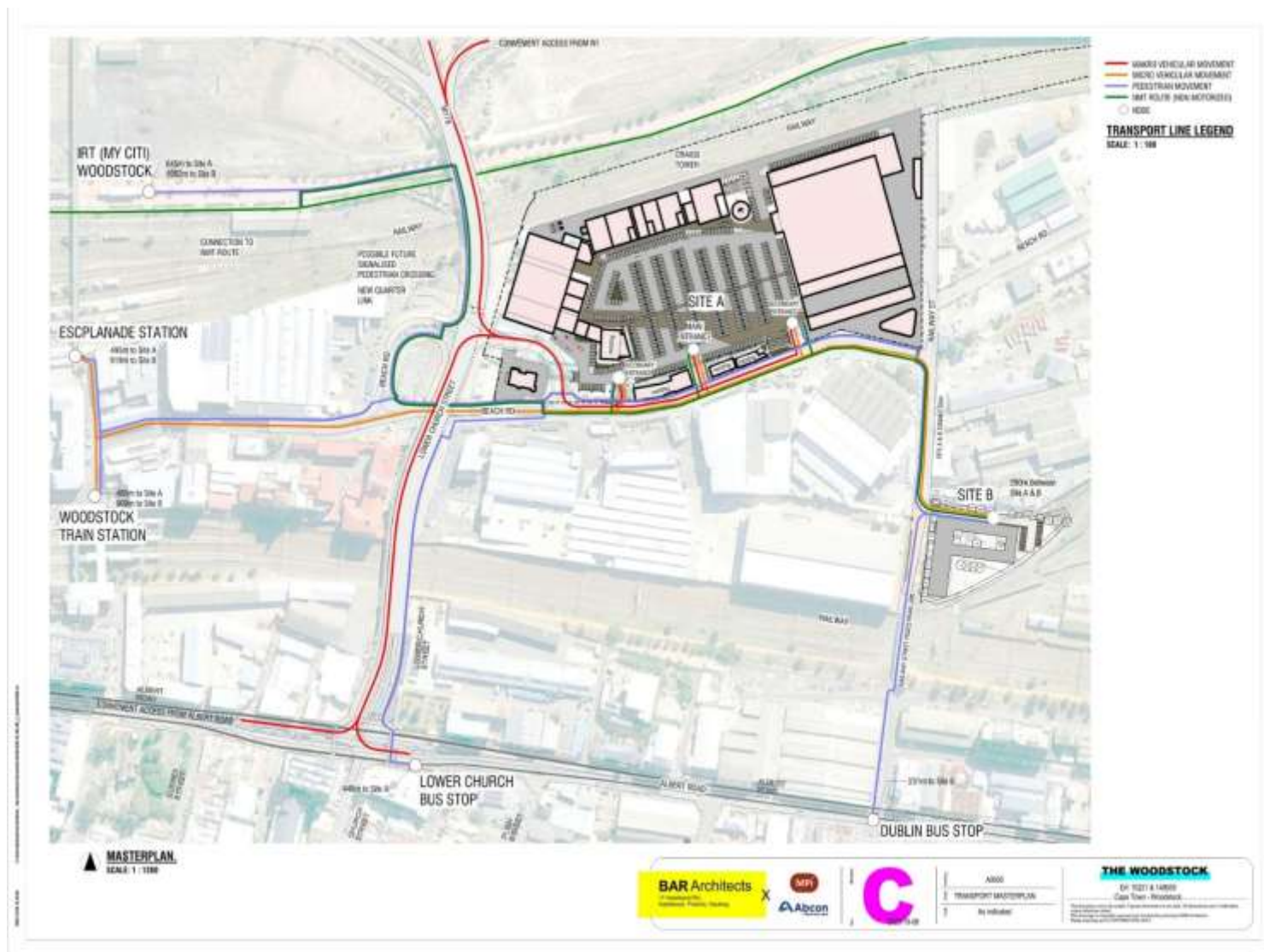


Figure 13: Public Transport and NMT Linkages



Figure 14: Landscape Master Plan



Figure 15: Site B Development Proposal



Figure 16: Elevations Site B



Figure 17: Site A and B – Massing Diagram

5. ENGINEERING SERVICES

The following section sets out the relevant findings and recommendations of the engineering services and infrastructure required to service the site.

5.1. Traffic Impact Assessment

5.1.1. Overview

A Transport Impact Assessment (October 2025) has been prepared by *Stef Naude Transport Consulting* – refer to **Annexure J** attached hereto. The report assesses the likely impact of the proposed approximated 23 562 m² GLA mixed-use development known as The Woodstock, along with the associated social and/or affordable housing component of an anticipated 299 units (with a potential total floor space of ±15 642 m²) in the basket of rights, on traffic operations within the surrounding road network. The assessment further considers the implications for public transport and non-motorised transport modes and outlines key infrastructure and operational interventions to support the proposed development.

5.1.2. Summary of Findings and Recommendations

This Transport Impact Assessment reviewed the likely impact that the development of the 23 562m² development that will comprise 'The Woodstock' (Site A) and 'The Lenah Residences' (Site B, with a potential total floor space of ±15 642 m²) will have on traffic operations on the surrounding road network, and also considered public transport and non-motorised transport aspects. The following findings are highlighted:

- Traffic data to assess the impact of the retail centre on traffic operations was collected during Friday PM, and Saturday Midday peak periods. It appears that the traffic demand is more dispersed on a Friday PM compared with a weekday PM period, which results in less concentrated congestion on the network.
- Queues backing up on Albert Road to Lower Church Street on a Saturday are mainly due to the disruptive impact of traffic operations at the Biscuit Mill, located upstream of the study area.
- An investigation into the application of appropriate trip generation rates indicated that the Shopping Centre land use category, adjusted for mixed use and proximity to public transport services, would be most appropriate.
- The retail centre and social housing development is projected to generate 1 080 veh/hr in the PM peak hour, and 1 409 veh/hr in the Saturday Midday peak hour. Adjustments to determine net new external trips considered local trips in the Beach Road precinct (10 - 15%), and pass-by trips (12 - 13%). This is considered a conservative projection as no adjustments related to possible lower vehicle ownership, or peak spreading has been made.
- The existing sub-standard access arrangements to the Beach Road precinct is proposed to be resolved by a new quarter-link, duplicating the existing link on the east side of Lower Church Street. It is associated with the dualling of Lower Church Street, which itself is linked with large-scale upgrading of the N1 corridor, but will be linked with the current two lane road in the interim.

- The new ramp is required to accommodate the traffic demand resulting from the new retail centre, with the existing signalised intersection at Lower Church Street/ Beach Road intersection not able to accommodate the projected demand. The two new intersections will operate as left in; left out arrangements (no signals required).
- Upgrading proposals exist for the Albert Road/ Lower Church Street/ Church Street intersection for the medium and long terms. The analysis in this report indicates that for the future scenario, the upgrading would not yet be required, as the current intersection has sufficient capacity to accommodate the projected traffic flows. Network capacity improvements are further required for the benefits of the upgrading to be realised.
- For reasons outlined in the report, while the establishment of the new quarter-link is essential to mitigate the impact of trips generated by The Woodstock development, the resultant local development facilitation and wider road network benefits warrant co-funding contributions towards its construction.
- The site access arrangements will result in the spacing of accesses along Beach Road at $\pm 110\text{m} - 160\text{m}$ intervals, which are adequate.
- The site falls in a PT2 zone with respect to minimum off-street parking provision, which means that no requirements are set. Parking has been provided at 3.1 bays/100m², which results in the provision of 733 parking bays. Parking for the social housing development is provided at a ratio of 0.07 bays/unit.
- Public transport demand generated by the development is likely to be limited. It is anticipated that the likely level of public transport demand should be absorbed within the current range of services available in the vicinity of the development.
- The Beach Road precinct is poorly served by pedestrian links given its isolation by rail infrastructure. The current pedestrian crossing at the signalised Lower Church Street/ Beach Road intersection will fall away with the new quarter-link. Improvements such as new quarter-link and better crossing facilities at the upgraded Albert Road intersection will compensate for this removal.
- Wider Precinct Benefits and Cost Apportionment:
The establishment of the new quarter-link will provide substantial accessibility benefits beyond The Woodstock site. The development area (± 6.34 ha) constitutes approximately 25% of the total Beach Road “island” precinct (± 25 ha) bounded by railway lines (See **Figure 18**). The remaining $\pm 75\%$ of land — comprising parcels owned by PRASA, the City of Cape Town, and private entities — will enjoy improved accessibility and redevelopment potential as a direct result of this intervention.

While *The Woodstock* will be a major benefactor of the quarter-link, the broader accessibility and mobility improvements clearly extend across the entire precinct and contribute to the public network’s efficiency. Accordingly, it is recognised that:

- The applicant is a long-term leaseholder (± 40 years), and thus a limited-period beneficiary of the road upgrade;
- PRASA and other landowners within the precinct will be majority beneficiaries of the improved access in perpetuity; and

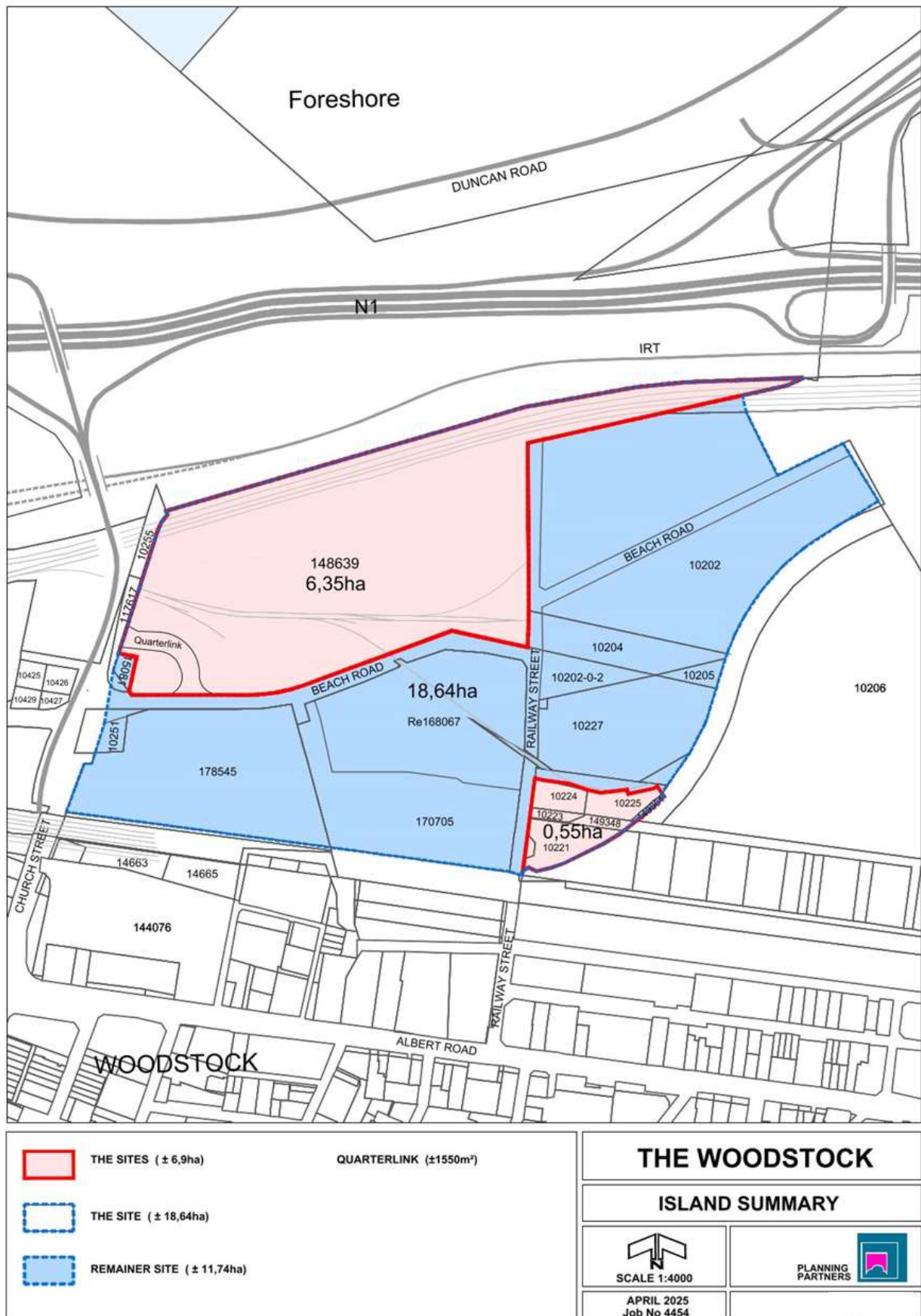


Figure 18: Site A and B – Beach Road Island

- The applicant has adjusted its development footprint to accommodate the required alignment of the quarter-link within the site, effectively reducing its developable envelope in the public interest.

In view of these considerations, the report notes that the quarter-link represents shared infrastructure with public and precinct-wide benefits, warranting an equitable cost apportionment between direct and indirect beneficiaries. The classification of Lower Church Street as a Class 3 facility supports the inclusion of such works under developer contribution set-off provisions, enabling the recovery of a portion of the costs through standard municipal mechanisms.

The key finding of this report is that the new quarter-link will significantly improve access to the Beach Road precinct, without which the development cannot be accommodated on the local road network. It is recommended that more detailed planning and design for this link be commenced with, with a view to its implementation.

An Addendum to the TIA dated July 2026 (See **Annexure J.1**) assessed the future geometry of Beach Road as assessed in the Traffic Impact Assessment (TIA) for The Woodstock development. The functioning of the future intersection from a traffic operations perspective, with alternately two and three lanes along Beach Road, i.e. a (i) a shared westbound through and right turn lane; and (ii) separate through and right turn lanes, was further assessed.

In the main the analyses indicates that in future, the intersection will perform at very high levels of service (LOS A) irrespective of the geometry of the intersection. Due to higher flows during a Saturday midday peak hour (peak trip generation demand of the centre), slightly longer delays are experienced. The worst performing movement on a Friday PM peak hour is the southbound right turn movement, which will be unaffected by the geometric configuration as tested. On a Saturday, the worst performing movement is the eastbound through movement, which will experience marginal increase in delay (12 to 15 sec/veh), due to the presence of right turning vehicle in the shared lane.

The key finding of the additional analysis was that:

- No real advantage is gained by the introduction of a separate right-turn lane on Beach Road at the new quarter-link intersection from a traffic operations perspective. It is therefore recommended that the existing two-lane cross-section of the roadway be retained for the future scenario.
- It is further recommended that a median island should be provided on Lower Church Street as a short-term measure prior to the dualling of the road in the longer term

The recommendations have been taken into account in the concept road layout included in this report. **Figure 19** illustrates the proposed external road infrastructure upgrades, including provision for sidewalks that improve NMT network improvements, where required.

These proposals have been extensively workshopped with the relevant officials of the City of Cape Town, in order to achieve agreement between the parties as to the proposed road network infrastructure upgrades that would be required to served the proposed development, and to achieve safety of movement for both vehicular and non-vehicular traffic.

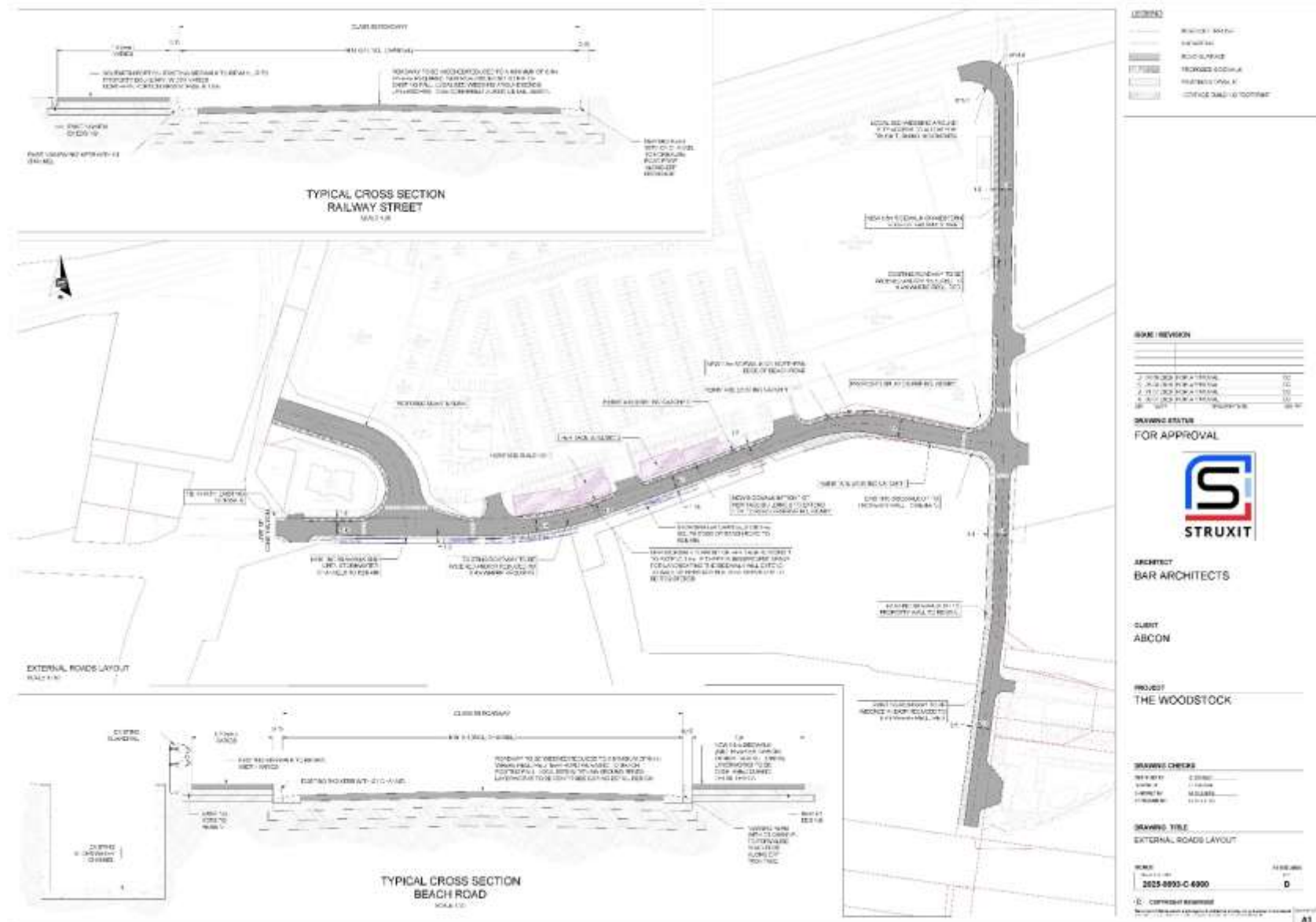


Figure 19: External Road Proposals and Upgrades

5.2. Civil Engineering Services

5.2.1. Overview

A civil engineering reports have been prepared by *Struxit*. The reports demonstrate the availability of engineering services and any proposed infrastructure upgrades that may be required to service the proposed development at The Woodstock.

5.2.2. Stormwater (Stuxit May 2026)

Struxit has revised and finalised the Stormwater Management Plan previously prepared by Nadeson Consulting Services (October 2025) (Attached as ***Annexure K***).

The investigation determined that two development parcels are currently characterized by industrial hardstand surfaces and high imperviousness (~85-95%).

(a) Existing Stormwater Infrastructure

The following existing stormwater infrastructure has been confirmed from CoCT as-built records and site assessment:

Site A:

- An existing stormwater canal runs along the southern side of Beach Road, in front of Site A. Culverts sized at 1 676 mm have been installed under roadways and tie into this canal.
- An existing stormwater line runs through Site A within Tide Street, commencing at 300 mm and increasing to 525 mm as it ties into a 600 mm line within Lower Church Street to the west. This line traverses the development footprint and will be demolished as part of the development.
- An existing 300 mm stormwater line runs along Railway Road, north of the existing stormwater canal, tying into the 1 676 mm culvert within Beach Road.
- An existing 1 067 mm stormwater culvert runs along Railway Road south of the canal and ties into the 1 676 mm culvert within Beach Road.

Site B:

- An existing 300 mm stormwater line runs along Railway Road, north of the existing stormwater canal, connecting to the 1 676 mm culvert at Beach Road.
- The 1 067 mm culvert referenced above also provides downstream capacity for flows from the Site B catchment.

(b) Hydrological Findings

- **Peak Flow Control:** For Site A & Site B, post-development peak flows are lower than existing-development levels across all return periods (5-year to 100-year) due to integrated landscaping and reduced imperviousness relative to the current industrial hardstand condition.
- With respect to the 1:50-year requirement, both sites demonstrate full compliance without attenuation infrastructure. With respect to the 1:10-year requirement, it is motivated on the grounds that on-site attenuation is physically non-viable due to floodplain inundation

and high groundwater constraints, and that the policy's downstream protection objective is fully satisfied given that post-development flows do not exceed existing development flows across any return period.

(c) Stormwater Quality and SUDS

The proposed strategy incorporates **Sustainable Urban Drainage Systems (SUDS)** and **Water Sensitive Urban Design (WSUD)** principles to meet City of Cape Town (CoCT) quality requirements:

- Target: Treatment of the ½-year, 24-hour storm event to remove 80% of Total Suspended Solids (TSS) and 50% of Total Phosphorus (TP).
- Interventions: All runoff will be reticulated to bioretention ponds at municipal connection points. Site A will also utilize grassed swales, landscaped buffers, and oil separators at discharge points

(d) Flood Management

Both sites fall within the Salt River catchment floodplain.

- Flood Levels: The current accepted 1:100-year flood level is 4.0 m amsl, though this is acknowledged by the City as outdated. STRUXIT has commissioned independent hydraulic modeling to contest this level.
- Safety Measures: All finished floor levels (FFLs) will be designed to a minimum of 250 mm above the accepted 1:100-year flood level.
- Emergency Routing: Storm events exceeding system capacity will be managed via overland escape routes along Beach Road and Railway Street, ultimately converging at an existing open channel.
- The report concludes that the proposed strategy satisfactorily addresses CoCT policies for quantity and quality control. The developer will assume full financial and operational responsibility for the ongoing maintenance and monitoring of the stormwater infrastructure Flood Assessment.

The site is acknowledged to lie within a flood zone, and a full Stormwater Management Plan (SWMP) will be required before approval.

The CCT: CSRSM confirmed that the current accepted 1:100-year flood level is 4.0 m amsl, as determined by ID modelling. However, this level is based on the SRK flood study completed in 2012 and is considered outdated.

Delta Hydro Engineers (Pty) Ltd ("DHE") have therefore undertaken a desktop flood line analysis of the Black-, Liesbeek- and Salt River in support of the application. The study reach extends from the Black–Liesbeek confluence at the Two Rivers Urban Park (TRUP) in Observatory, downstream through the concrete-lined Salt River canal to the canal mouth at Table Bay (**Annexure L**). The combined catchment is over 200 km², draining the eastern slopes of Table Mountain together with the central, northern and southern Cape Town suburbs. Quaternary catchment G22A is officially classified as ungauged, and there is therefore no long-term DWS

streamflow record on the Salt, Black or Liesbeek rivers from which to perform a defensible flood-frequency analysis.

To date desktop analysis has been completed, which estimates that the 1:100 year floodline is sitting at 3.36m above m.a.s.l.

The next phase of work will include: (i) a detailed bathymetric surveys of the Black, Liesbeek and Salt Rivers; (ii) a detailed survey of the hydraulic structures (bridges, culverts and the Salt River canal) including soffit and invert levels; (iii) a calibrated hydrological assessment with engagement of the City of Cape Town for level-logger and flow data, procurement of the SRK Salt River SWMM model and the Sigma Beta (CHI R220-27) outputs from CSRM, and acquisition of the PRDW marine boundary dataset; and (iv) a fully signed-off statutory flood line study in accordance with the relevant National Water Act and City of Cape Town Floodplain and River Corridor Management Policy requirements.

The study is programmed to be completed by end November 2026. The results will therefore be available to inform detailed building design stage of the development process, to ensure that The FFL of buildings will be designed to be 250mm higher than the 1:100-year flood line.

5.2.3. Sewer Reticulation

Existing Sewer Infrastructure

The following existing sewer infrastructure has been identified around the development sites and can be found in **Annexure M**:

Site A vicinity:

- An existing 160 mm Ø foul sewer pipe runs within Site A along Tide Street, increasing to 225 mm Ø as it extends to Lower Church Street. This sewer traverses the development footprint and will be demolished.
- A 450 mm Ø foul sewer main runs along Beach Road, south of Site A, tying into a 600 mm Ø line.

Site B vicinity:

- An existing 160 mm Ø foul sewer line is situated within Railway Road, west of Site B.

Proposed Sewer

There is existing sewer infrastructure around both sites. Site A is planned to tie into the existing 450mm foul sewer line within Beach Road. The existing 225mm/160mm sewer pipe running within Tide Street will be demolished before it enters into the site. Site B is planned to tie into the existing 160mm line within Railway Road. The available capacity of the existing sewer infrastructure and WWTP need to be confirmed by CoCT. The calculated flows from the two developments are shown in the Tables below:

Table 2: Calculated sewer demand for The Woodstock (Site A) – Nadeson Consulting 2025

Land use	No of Units	Area (m ²)/GLA	Unit Discharge		Dry Weather flow (kL/d)	Wet Weather Flow (kL/d)	Peak Wet Weather flow (kL/d)	Peak Wet Weather flow (l/s)
Commercial	TBC	18 270	(kL/ha/d)	17	30.69	39.90	59.85	0.69
Residential	TBC	5 330	(kL/ha/d)	24	13.06	16.98	42.44	0.49
Total					43.75	56.88	102.29	1.18

Peak Factor-Commercial (Red Book Table K.8) = 1.5

Peak Factor-Residential (Red Book Table K.8) = 2.5

Table 3: Calculated sewer demand for The Woodstock (Site B) – Nadeson Consulting 2025

Land use	No of Units	Area (m ²)/GLA	Unit Discharge		Dry Weather flow (kL/d)	Wet Weather Flow (kL/d)	Peak Wet Weather flow (kL/d)	Peak Wet Weather flow (l/s)
Residential	299	TBC	(kL/units/d)	0.29	67.33	87.52	218.81	2.53
Total					67.33	87.52	218.81	2.53

Peak Factor (Red Book Table K.8) = 2.5

The capacity analysis prepared by *Nadeson Consulting Services* is attached as “Appendix C” to the Struxit report. The capacity analysis confirms that sufficient capacity exists in the municipal sewer networks to accommodate the proposed development. The City of Cape Town’s Water and Sanitation: Technical Services has confirmed that the sanitation infrastructure capacity analysis was previously completed for this development and remains valid.

- Calculated Sewer Demand – Site A and Site B (Struxit 2026)

LAND USE	AREA / UNITS	DWF (kL/d)	WWF (kL/d)	PEAK WWF (kL/d)	PEAK (l/s)
Site A – Commercial	18 270 m ² GLA	17	30.69	39.90	0.69
Site A – Residential	5 330 m ²	13.06	16.98	42.44	0.49
Site A Total	–	43.75	56.88	102.29	1.18
Site B – Residential	299 units	67.33	87.52	218.81	2.53

Note: Peak factors per Red Book Table K.8: Commercial = 1.5; Residential = 2.5. Municipal bulk capacity confirmed as sufficient by CoCT Technical Services in 2026.

Comment received from the City of Cape Town confirms that the following conditions that will need to be met:

- The existing 150/225 mm Ø sewer traversing Erf 148639 within Tide Street is to be demolished as part of the development. It will not be retained within the new development footprint. No structures will be built over the sewer reticulation maintained by the CoCT municipality. The removal of the Tide Street sewer will be carried out at the developer’s cost, to the satisfaction of the Wastewater Conveyance Department, and will be

coordinated with sewer reticulation design drawings submitted to SewConn.AthloneR4@capetown.gov.za.

- A new sewer connection design for Site A will be submitted to SewConn.AthloneR4@capetown.gov.za for approval, comprising of two connections: one tying into the existing 450 mm Ø main in Beach Road to the south, and a second connecting into the existing sewer infrastructure to the west of the site. Both designs will be signed off by a registered civil engineer. Site B will connect to the existing 160 mm Ø line within Railway Road.
- Any changes made to proposed Subdivision and the Consolidation Drawings will require resubmission of sewer reticulation design drawings for approval. The applicant undertakes to update sewer design drawings and resubmitted in the event that any such changes are made.
- No stormwater to sewer ingress will be permitted. All proposed drainage systems will maintain strict separation of stormwater and foul sewer systems. This will be confirmed through the sewer design drawings submitted for approval.

5.2.4. Water Reticulation

(a) Existing Water/infrastructure

The following existing water reticulation infrastructure has been identified around the two development sites:

Site A vicinity:

- 150 mm Ø Cast Iron (CI) water main in Beach Road (south of Site A)
- 150 mm Ø Asbestos Cement (AC) water main in Tide Street (traversing Site A)
- 150 mm Ø Asbestos Cement (AC) water main in Lower Church Street (west of Site A)
- 300 mm Ø CI water main in Railway Road, with a 100 mm Ø parallel line

Site B vicinity:

- 100 mm Ø CI and 300 mm Ø CI water mains in Railway Road (west of Site B)
- 535 mm Ø Steel water main in Railway Road, traversing Erf 10448 and Erf 10221-RE (within the Site B footprint). This main originates from Railway Street and crosses beneath the development erven.

5.2.5. Water Demand

There is existing water infrastructure around both sites. Site A is planned to tie into the existing 160mm fibre cement water line within Beach Road. The existing 160mm FC watermain running within Tide Street will be demolished before it enters into the site on both sides. Site B is planned to tie into the existing 100mm CI watermain within Railway Road. The calculated water demands from the two developments are shown in the Tables below:

Table 4 : Calculated water demand for The Woodstock (Site A) – Nadeson Consulting 2025

Land use	Area (m ²)/GLA	AADD (Redbook Table J.2)		AADD (kL/d)	Peak AADD (kL/d)	Peak AADD (l/s)
Commercial	18 270	kL/ha/d	21	38.37	126.61	1.47
Residential	5 330	kL/ha/d	25	13.33	61.30	0.71
Parking Grounds	9 163	kL/ha/d	0.3	0.27	0.91	0.01
Total				51.97	188.81	2.19

Peak Factor-Commercial (Red Book Table J.9) = 3.30 (PF_{hour})

Peak Factor-Residential (Red Book Table J.9) = 4.60 (PF_{hour})

Fire flow category = 2400l/m (40l/s) with a min of 300kPa at high point.

Table 5: Calculated water demand for The Woodstock (Site B) – Nadeson Consulting 2025

Land use	No. of units (No.)	Area (m ²)/GLA	AADD (Redbook Table J.2)		AADD (kL/d)	Peak AADD (kL/d)	Peak AADD (l/s)
Residential	299	TBC	kL/unit/d	0.3	68.70	316.02	3.66
Total					68.70	316.02	3.66

Peak Factor (Red Book Table J.9) = 4.60 (PF_{hour})

Fire flow category = 2400l/m (40l/s) with a min of 300kPa at high point.

The capacity analysis previously prepared by *Nadeson Consulting Services* is attached as “Appendix C” to the Struxit report. The capacity analysis confirms that sufficient capacity exists in the municipal water networks to accommodate the proposed development. The City of Cape Town’s Water and Sanitation: Technical Services has confirmed that a water the infrastructure capacity analysis was previously completed for this development and remains valid.

5.2.6. Proposed Water Connections – Struxit 2026

Site A:

Site A is proposed to connect to the existing 150 mm Ø CI water main within Beach Road. The existing 150 mm Ø AC water mains in Tide Street and Lower Church Street, which currently traverse the development footprint, will be removed and abandoned as follows:

The existing 150 mm asbestos cement water mains will be isolated, drained and physically removed from the ground in sections by a suitably accredited contractor, with all associated costs borne by the developer. Prior to commencement of works, a meeting will be arranged with relevant permission to agree on the methodology and programme. Given the asbestos cement nature of the pipes, all works will comply with the Asbestos Regulations 2001 under the Occupational Health and Safety Act, 1993, including appropriate wetting, containment, bagging and disposal to a licensed facility. This methodology will be further refined and submitted to the relevant official for approval prior to construction commencing.

Site B:

Site B is proposed to connect to the existing 100 mm Ø CI water main within Railway Road.

The 535 mm Ø steel water main, which traverses Erfs 10448 and 10221-RE (within the Site B footprint), will be managed as follows:

The existing 535 mm steel water main traversing the Site B erven will be protected through a combination of concrete encasement and increased cover where required, with permanent marker posts installed at each boundary crossing and no permanent structures constructed over the pipeline route. All associated costs will be borne by the developer, the Water Reticulation Department's reticulation team will be afforded unobstructed access at all times during construction and operation, and the protection methodology will be refined in consultation with the relevant official prior to any works commencing.

A formal servitude over the pipeline route in favour of the Water Reticulation Department is currently being applied for and will be progressed in terms of Section 67 of the MPBL, as a subsequent stage of the development process.

5.4 Calculated Water Demand

The following water demands have been calculated for the two development sites based on accepted design standards (Red Book, Table J.2 and J.9):

- Calculated Water Demand – Struxit 2026

Table 4-2: Calculated Water Demand – Site A and Site B

LAND USE	AREA / UNITS	AADD (kL/d)	PEAK AADD (kL/d)	PEAK AADD (l/s)
Site A – Commercial	18 270 m ² GLA	38.37	126.61	1.47
Site A – Residential	5 330 m ²	13.33	61.30	0.71
Site A – Parking/Grounds	9 163 m ²	0.27	0.91	0.01
Site A Total	–	51.97	188.81	2.19
Site B – Residential	299 units	68.70	316.02	3.66

Note: Peak factors applied per Red Book Table J.9:

- Commercial PF_{hour} = 3.30
- Residential PF_{hour} = 4.60
- Fire flow category 2 applies: 2 400 l/min (40 l/s) with minimum 300 kPa at the high point

5.2.7. Solid Waste

Refuse management for the two sites will be handled differently given their respective uses.

- **Site A**, as a commercial and retail development, will be serviced by a private waste management contractor, with dedicated on-site refuse storage and collection areas to be indicated on the SDP drawings.
- **Site B** will be serviced by the City of Cape Town's municipal refuse collection, with domestic waste collected on a weekly basis using self-compacting refuse vehicles via Railway Street. Dedicated refuse collection embayments or designated areas adjacent

to the street boundary will be provided at Site B in accordance with RIM requirements, and stacking of bins along the verge or sidewalk will not be permitted.

It should be noted that Erf10448 Cape town, is retained as public road and provides for the turning movements of vehicles at the southern end of Railway Street

5.3. Electrical Engineering Report

5.3.1. Overview

The appointed electrical consulting engineers, *Converge Consulting*, have compiled a detailed electrical engineering report – refer to **Annexure N** attached hereto. The report evaluates the energy demand requirements and outlines how the proposed Woodstock development can be accommodated by the City of Cape Town's electrical infrastructure.

5.3.2. Existing Supply

Site A: The City of Cape Town's Electricity Department has treated Tide Rd as a public road and has provided a separate supply to each lease area or building. There are currently 3 substations within the proposed development area – an RMU, a transformer and a minisub. Once all leases have been terminated, the City will remove all the supplies and the associated meters, as well as the 3 substations.

The City has 2x11kV cables along the Western edge of Railway Street. The development is not permitted to encroach on or disturb them; however, they can be relocated by replacement if required.

Site B: The City of Cape Town's Electricity Department has treated the separate erven as one area. Site B currently received a 400V low voltage supply from the City.

5.3.3. Maximum Demand

The electrical load requirements for the proposed development are as shown in **Table 6**.

Table 6: Summary of Maximum Diversified Demand

Site	Description	Maximum Demand
A	Mixed Use Precinct	1.9 MVA
B	Social housing	620 kVA
	Total	2.5 MVA

The diversified maximum demand for Site A (mixed-use complex) is estimated at 1.9MVA, while Site B (social housing) will require a load of approximately 250kVA.

5.3.4. Supply Authority Confirmation

Engagement with the City of Cape Town determined the impact of the required supplies on the current infrastructure.

- **Site A:** There is currently installed capacity on Site A. Infrastructure consists of an RMU, a transformer and a minisub, with an estimate total available supply in the region of 1,8-2,2MVA. The proposed development has maximum demand of 1,9MVA, and the study confirmed that there is sufficient available capacity on the existing network.

- **Site B:** Site B currently has a low voltage supply. The City has not confirmed the size of this supply. Based on the required load for the Social Housing site, an upgraded supply will be required. It is proposed negotiate with the City to allocate the additional spare capacity from Site A to Site B to negate or limit any Shared Network Charges for this upgrade.

5.3.5. Infrastructure requirements

- **Site A:** Once all equipment has been removed by the City, the Developer will be responsible for the removal of all redundant cabling, and the construction of a Unigear substation building/room on the Beach Road frontage. The City will terminate 11kV cables into this room, and all internal reticulation to the site from the Unigear room will be done by the Developer.
- **Site B:** Site B will require a new LV bulk supply of 620kVA or 900A TP. As this supply is over 150A TP, a new substation site of dimensions 5,0 x 4,0m will be required on the site boundary on Railway Street for the installation of a new City of Cape Town miniature substation.

The current load calculations for the proposed development for Site A has a maximum demand of 1,9MVA and for Site B is 620kVA for Site B. The City of Cape Town, has confirmed that the current electrical infrastructure has the required capacity

5.4. Site Contamination

Due to the long history of industrial and rail related uses on the sites, as well as the fact that for the most part the properties are hard surfaced, detailed contamination studies will need to be completed, should this application be approved by the City of Cape Town. The outcomes of these studies will determine the level of rehabilitation and/or mitigation measure that will be required, depending on the use and to ensure that the site does not pose a negative risk to the end users thereto.

The Applicant undertakes to complete these studies prior commencement of construction on the site and that statutory health and safety requirements will be adhered to in the execution of the works.

6. COMPLIANCE WITH THE DEVELOPMENT RULES OF THE DEVELOPMENT MANAGEMENT SCHEME

Notwithstanding the proposed departures, it is necessary for the development proposal to demonstrate compliance with the relevant development rules for Mixed Use Sub-zone 2 (MU2) as contained in the City of Cape Town's Development Management Scheme (DMS). **Table 7** below outlines the applicable rules and the degree of compliance:

Table 7: Compliance with Regulations contained in the DMS

Item	Item Relating	Development Rule	Proposal	Compliance
64(a)	Coverage	Maximum 100%	Site A: 30% (site area = 63 493 m ²); Site B: 32% (building footprint of ±1 738 m ²).	Compliant Confirmation of coverage to be confirmed at build plan submission stage.
64(a)	Floor Factor / Floor Space	Floor factor = 4,0 Site A area = 63 493 m ² Permissible total floor space: = 63 493 m ² x 4,0 = 253 972 m ² Site B area = 5 416 m ² Permissible total floor space: = 5 416 m ² x 4.0 = 21 664 m ²	Site A: Proposed GLA = 23 562 m ² (retail/office mix, FSR = 0.3702).; Site B: Potential total floor space of ±15 642 m ² .	Compliant Confirmation of GLA and Floor Space to be confirmed at build plan submission stage
64(a)	Height	Maximum height above base level to top of roof = 25,0 m (30m in MPBL 2025)	Site A: Anticipated ≤ 25 m to roof ridge (varies between 15–25 m across frontages). Site B: 25 m to roof parapet; 27 m including 2 m lift shaft overrun.	Compliant within the MU2 zoning envelope (MPBL 2025) Heights to be confirmed at build plan submission stage.
64(b)	Council may require an 8 m Street centreline setback		Note: Site A: Potential encroachment along Beach Road due to piazza/colonnade frontage (approx. 6.5–7.0 m from centreline). Site B: 5 m building setback from street boundary; >8 m from centreline.	Compliant. To date the City of Cape Town has not requested a centreline setback .
64(c)	Building lines (common and street boundaries)	Below 10,0m height = 0,0 m Above 10,0m height = 4,5 m*	Site A: Departure sought to relax 4.5 m to 0 m along Beach Road for architectural articulation above 10 m.	Site A: Not Compliant (Departure applied for). Site B: Compliant.

Item	Item Relating	Development Rule	Proposal	Compliance
			Site B: 5 m building line observed along public street; compliant elsewhere.	
60(e)(i)	Number of parking bays	3 bays per 100 m ² (DMS Baseline requirements)	Site A: 701 bays required; 719 bays provided (3.1 bays/100 m ² GLA) → Surplus = 32 bays. Site B: 23 bays provided for 297 units (0.07 bays/unit) — consistent with PT2 zone relaxation and TOD context.	Compliant. Both sites exceed or align with context-specific parking standards; PT2 zone exempts minimum parking requirements.
60(e)(ii)	Position of parking bays	Parking bays shall not be located closer than 10 m to the street boundary at ground floor level		Compliant.
140(2)(a)	Number of carriageway crossings (entrance or exit way, or a combined entrance and exit way)	Max 1 per public street frontage.	Site A: 5 crossings on Beach Road, 2 on Church Street – justified for operational functionality (retail access, service, and emergency routes). Site B: 1 crossing on Railway Road.	Site A: Not Compliant. Departure included as supported by TIA (Oct 2025). Site B: Compliant.
140(2)(c)	Width of motor vehicle carriageway crossing	The minimum and maximum width of any motor vehicle carriageway crossing shall be 2,4 m and 8,0 m respectively.	Final widths to be determined at building plan stage; all crossings to comply with CoCT standards and TIA recommendations.	Compliant in principle. Final compliance to be verified at building plan submission.
Right of Way Servitude		To be registered in favour of the City for Church Street quarter-link (±1 550 m ²).	Servitude diagram to be prepared post-detailed design.	Will comply.
Land-scaping / Public Realm		Pedestrian and landscaped walkways, courtyard park, NMT links. Space for informal trading at both sites A and B	Integrated landscape plan prepared (refer to Annexure O).	Compliant and consistent with MU2 objectives and LSDF design guidelines.

7. DEVELOPMENT CONTROL

This section sets out the applicable development control framework for the subject properties following the proposed rezoning to Mixed Use Sub-zone 2 (MU2) in terms of the City of Cape Town DMS.

The Remainder of Erf 148639 (Site A), measuring approximately 48 849 m², is proposed to be rezoned to MU2, Portion 1 of Erf 148639, measuring approximately 13103 m² to be zoned MU2, being zoned TR1 and TR2, in terms of the substitution scheme, to ensure the uninterrupted operation of road and rail infrastructure. The consolidated group of Erven 10221, 10223, 10224, 10225, 149351 and 149348 (Site B) is proposed to be rezoned to MU2 in its entirety.

MU2 provides an appropriate regulatory framework to accommodate a mix of commercial, residential and compatible light-industrial uses within defined bulk and performance parameters, without requiring further rezoning should market conditions change in future.

7.1. Development Control Framework (“basket-of-rights” approach)

The development of Sites A and B will be governed by the bulk, coverage, height and use parameters applicable to MU2 zoning, rather than by a fixed unit yield. This allows flexibility in layout and phasing while remaining fully compliant with the Development Management Scheme.

Site A will function as a retail-led mixed-use component with capacity for future vertical expansion (e.g. offices, compatible light-industrial or residential uses) within approved bulk parameters.

Site B will be governed by floor area, coverage and height controls rather than a prescribed number of residential units, enabling adaptive delivery of social and affordable housing within the approved envelope.

7.2. Proposed Development Control Parameters

Table 8 below sets out the proposed development control parameters for Sites A and B:

Table 8: Proposed Development Control Parameters for the Subject Property

	Site A	Site B
<i>Site Area</i>	±64 493 m ²	±5 m ²
<i>Zoning</i>	MU2 (partial)	MU2 (entire site)
<i>Permissible FAR</i>	4.0	4.0
<i>Permissible Floor Space</i>	±253 972 m ²	±21 664 m ²
<i>Proposed Floor Space (initial phase)</i>	±23 562 m ² GLA	FF ± 13 633m ² (permitted 21 024 m ²)
<i>Coverage</i>	40 %	40 %
<i>Maximum Height</i>	±17m from NGL	≤ 25 m (+ 2 m lift overrun)
<i>Proposed Land Use</i>	Retail-led mixed-use with, restaurants, shops, offices, a supermarket and opportunity for informal trading; future light-industrial expansion potential based on market demand.	Social and affordable housing with ground-floor community/common amenities
<i>Parking Provision</i>	701 bays (3 / 100 m ² , as per DMS)	23 on-site bays (0.07 bays per unit) – PT2 Area
<i>Departures</i>	- Street building line relaxation along Beach Rd (4.5 m → 0 m) - Carriageway crossings (5 on Beach Rd; 2 on Church St) in lieu of 1 each - Parking setback relaxation (4 m from boundary in lieu of 10 m)	None anticipated beyond standard MU2 parameters; final verification at building plan stage.
<i>Right-of-Way Servitude</i>	± 2 166 m ² servitude to be registered in favour of the City for the proposed quarter-link ramp. To be confirmed at registration of the servitude.	Not applicable

7.3. Departures from Development Management Scheme

The proposal complies with MU2 zoning provisions, with the exception of the following targeted departures required to accommodate functional access and urban design considerations:

- Relaxation of street building line along Beach Road (4.5 m → 0 m);
- Increase in number of vehicular crossings:
 - Beach Road (5 crossings in lieu of 1)
 - Church Street (2 crossings in lieu of 1); and
 - Railway Street (3 crossings in lieu of 1).

These departures are operationally necessary and are supported by the TIA prepared by Stef Naudé Transport Consulting (2025).

All remaining development parameters comply with the Development Management Scheme.

7.4. Servitudes

The following section deals with the servitudes required (if applicable) by the following engineering services:

- Land Surveyors

DHA Land Surveyors confirmed the existence of a servitude over a portion of the site, described in the title deed as:

“The figure Gabc represents a servitude vide Diagram SG No A2988/1929 annexed to D/T 8303/1930.”

Initial SG diagrams did not accurately reflect this servitude. The Surveyor-General has been formally requested to update the diagram accordingly. All development proposals will accommodate the servitude and no permanent structures are proposed within the affected area. The updated SG diagram and annotated plans will be submitted under **Annexure P**.

- Transport Engineering:

Stef Naudé Transport Consulting recommends the construction of a new quarter-link ramp to accommodate traffic generated by the development. The existing Lower Church Street / Beach Road intersection cannot accommodate projected traffic volumes. The new ramp will operate as a left-in / left-out access and requires the registration of a right-of-way servitude of approximately 2 166 m² over Erf 148639 (Site A) in favour of the City of Cape Town. This servitude will enable construction, operation and long-term maintenance of the ramp to improve access to the Beach Road precinct.

The City of Cape Town has requested that a servitude be registered over their water supply pipeline crossing over Site B, in the south-western part of the site (See **Annexure C**). The servitude width will be confirmed once the precise location and depth of the pipeline has been confirmed.

8. THE APPLICATION SUBMITTED

8.1. Composite Land Use Application

Application is hereby submitted to the City of Cape Town in terms of the provisions of the

Municipal Planning By-Law (2015), as amended, for the following components:

8.1.1. Policy Deviation – Municipal Spatial Development Framework (2023)

In terms of Section 16 of the MPBL, approval is sought for a deviation from MSDF Policy P4 (industrial land retention).

As detailed in **Section 3.2**, a site-specific assessment confirms that:

- The existing industrial designation is no longer appropriate due to fragmented land configuration, constrained freight access, legacy infrastructure and geotechnical limitations;
- The proposal remains aligned with the MSDF's overarching spatial strategies of compact growth, TOD-led regeneration and urban consolidation;
- The introduction of social and affordable housing and employment-generating mixed-use development advances spatial transformation objectives; and
- MU2 zoning retains flexibility for compatible light-industrial and service-industrial uses.

A deviation from Policy P4 is therefore justified in terms of Section 16 of the MPBL.

8.1.2. Policy Deviation – Table Bay District Spatial Development Framework (2023)

A complementary deviation is submitted in terms of Section 16 of the MPBL to depart from the LSDF's industrial land designation.

As detailed in **Section 3.3**, the deviation is justified by:

- The site's location within the Urban Inner Core, a Transport Accessible Precinct and the Voortrekker Road Development Corridor;
- The established industrial-to-mixed-use transition supported by the Woodstock & Salt River LSDF (2023);
- The absence of viable heavy-industrial or port-logistics operations on the site; and
- The availability of more suitable industrial land in Paarden Eiland, Culemborg, Salt River Freight Rail, Richmond Park, King Air Industria and Airport Industria.

The proposal does not displace viable industry and retains industrial flexibility under MU2 zoning.

8.1.3. Policy Deviation – Woodstock Saltriver Local Spatial Development Framework (2024)

A complimentary application is made to deviate from the Woodstock Salt River LSDF industrial designation in terms of Section 16 of the MPB, on the basis of site specific circumstances.

As detailed in **Section 3.4**, the deviation is justified by:

- The property is PRASA owned, and indicated as a priority redevelopment and intensification area in the LSDF;
- It is located in proximity to lower church street which is indicated for commercial intensification, and the proposal includes a commercial component for warehouse, restaurants, retail and office uses providing for a range of business rental opportunities near high ,
- Prioritise NMT through improved road infrastructure improvements and safety in a

location within proximity of a range of public transport opportunities;

- Providing for affordable housing near public transport and amenities;
- Promote mixed use intensification and redevelopment within TOD nodes
- Presents infill development and densification within walkable and well located precincts
- Integration of heritage assets into the redevelopment of the site;
- Improving the public realm through landscaping; and
- Improved access to the Lower Church Street precinct (Subdistrict 8)

While not consistent with the LSDF, the proposal is aligned with policy guidance of the LSDF. And while the applicant has considered the provision of residential units as part of the land use mix on Site A, the proposal currently is not aligned from the business plan, for the construction and operational phases of the two distinct developments on Site A and B within the parameters of the lease agreement with PRASA.

8.1.4. Subdivision of Subdivision of Erven 10224, 10225 and 149351, Cape Town (Site B)

In terms of Section 42(d) of the MPBL, approval is sought for the subdivision of Erven 10224, 10225 and 149351, Cape Town into seven (7) portions:

- Subdivision of Erf 10224, Cape Town into two (2) portions being Portion 1 of Erf 10224 (0,5m²) and a Remainder (1 039,5 m²);
- Subdivision of Erf 10225 Cape Town into three (3) portions being Portion 1 (87 m²) and Portion 2 (3 m²) of Erf 10225 and a Remainder (1 171 m²); and
- Subdivision of Erf 149351 Cape Town into two (2) portions being Portion 1 of Erf 149351 (0,4 m²) and a Remainder (125 m²).

The subdivisions are required to accommodate a recently approved and constructed road that takes access of Railway Street and links Railway Street to the Transnet Container Yard to the east of Site B. See **Figure 20**. (See **Annexure B**)

8.1.5. Consolidation of Erven (Site B)

In terms of **Section 42(f) of the MPBL**, approval is sought for the consolidation of:

- Erf 10221, Erf 10223, Remainder 10224, Remainder 10225, Erf 149348 and Remainder 149351 Cape Town, resulting in a total consolidated site area of approximately 5 263 m². See **Figure 21**.

Refer to Plan of Consolidation prepared by David Hellig & Abrahamse Professional Land Surveyors (See **Annexure C**).

Table 9: Indicative Massing Overview - Consolidated Site B

Category	Details/ Parameters
<i>Site Description</i>	Consolidated Site B
<i>Total Consolidated Area</i>	± 5 363 m ²

Category	Details/ Parameters
<i>Proposed Zoning</i>	Mixed Use Sub-zone 2 (MU2)
<i>Indicative Coverage</i>	Up to 70% (to be refined at building plan stage)
<i>Indicative FAR</i>	4 (aligned with MU2 flexibility)
<i>Indicative Bulk</i>	± 13 633 m ² (≈ 280-300 units + communal facilities) (subject to final design)
<i>Height Envelope</i>	≤ 25 m (to top of roof; + 2 m lift overrun)
<i>Building Typologies</i>	Flats with community amenities
<i>Public / Community Uses</i>	Office, security facilities, courtyard play park, refuse area, potential ECD space and communal rooms
<i>Shared Open Space</i>	Landscaped courtyards, pedestrian linkages to Site A, play areas
<i>Parking Approach</i>	23 on-site bays (0.07 bays / unit average)
<i>Massing Rationale</i>	Optimises land use while maintaining appropriate scale transitions, maximising flexibility under MU2 to respond to funding, market, and housing delivery requirements

The massing and indicative parameters will be further refined during the future building plan stage while retaining sufficient flexibility to adjust to market conditions and social housing funding structures. This approach is consistent with basket of rights principles under MU2 zoning, ensuring resilience and adaptability over the lifespan of the development.

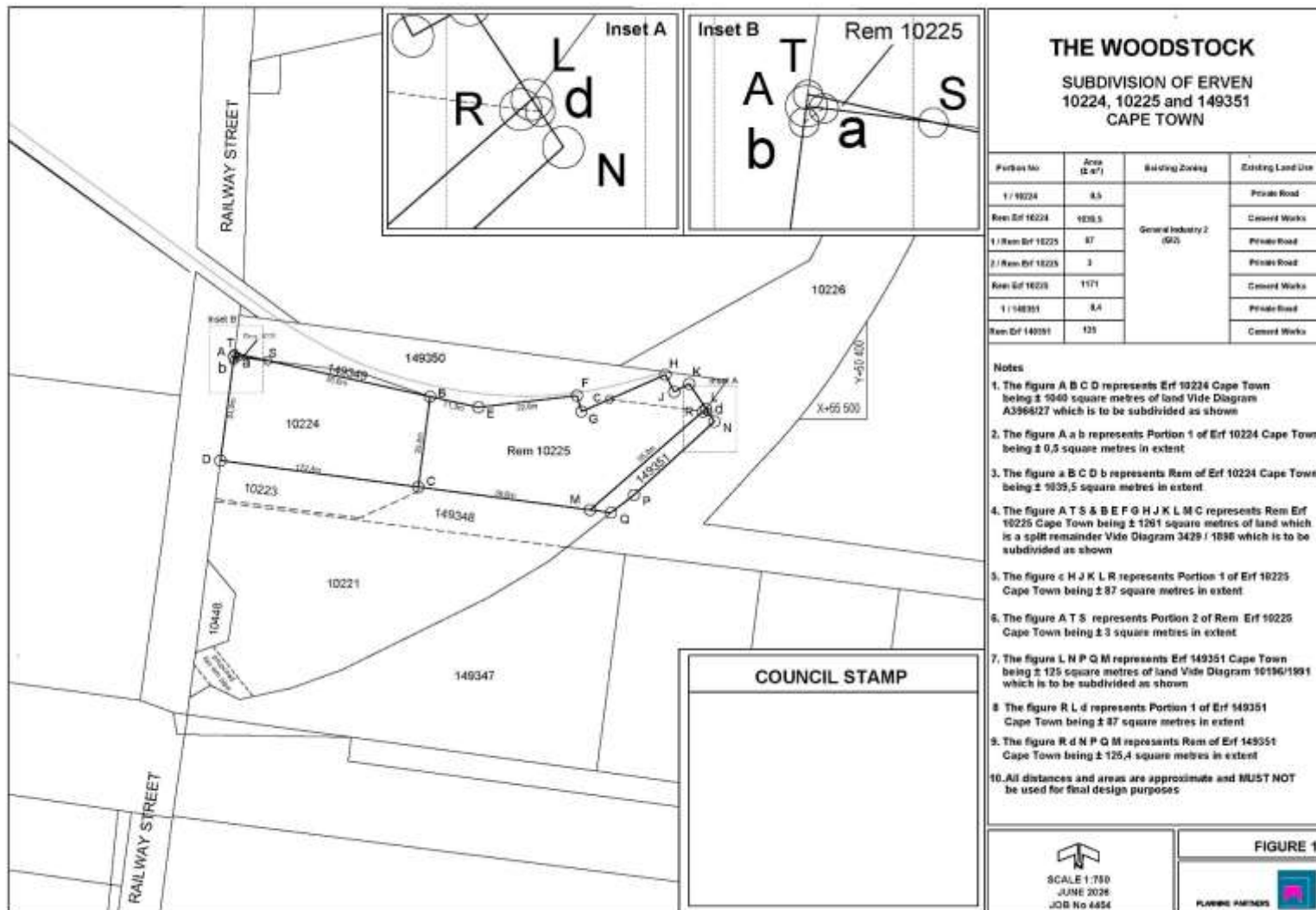


Figure 20: Subdivision of Erven 10224, 10225 and 149351 Cape Town

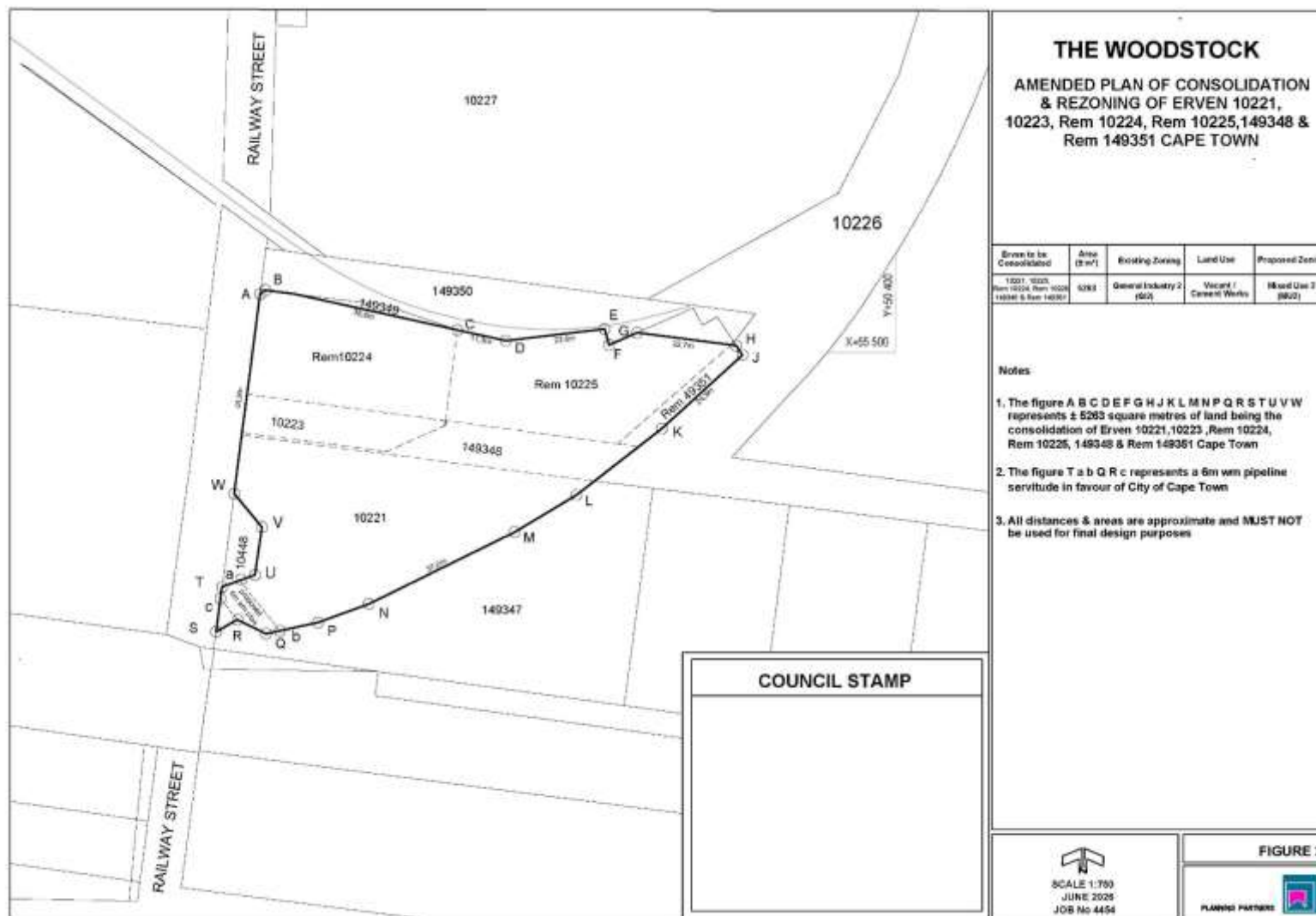


Figure 21: Consolidation and Rezoning of Erven 10221, 10223, Rem. 19224, Rem. 10225, 149348 and Rem. 149351

8.1.6. Rezoning of Erf 148639 Cape Town to Subdivisional Area and the Subdivision of Erf 148639 Cape Town into four (4) portions and a Remainder

In terms of **Section 42(a) of the MPBL** approval is sought for the rezoning of Erf 148639 Cape Town (64 493 m²) from Transport Zoning 1 (TR1), Transport Zoning 2 (TR2) and General Industrial Zoning 2 (GI2) to “*subdivisional area overlay zoning*” to permit the following:

- Portion 1 of Erf 148639 (unapproved Erf 184179) measuring ± 13103 m² be zoned Transport Zone 1 (TR1) to allow uninterrupted and continued operation of the railway line and associated transport functions
- Portion 2 of Erf 148639 (unapproved Erf 184180) measuring ± 2166 m² to be zoned Transport Zone 2 (TR2) to accommodate the proposed quarter link to Lower Church Street;
- Portion 3 of Erf 148639 (unapproved Erf 184181) measuring ± 1314 m² to be zone Mixed Use Zone 2 (MU2) to permit business premises (i.e. restaurant with drive-thru for a fast food chain) ;
- Portion 4 of Erf 149369 (unapproved Erf 184182) measuring ± 61 m² to be zoned Transport Zone 2 (TR2) to accommodate a chamfer at the intersection of Beach Road and Railway Street for road purposes; and
- Remainder of Erf 148639 measuring ± 46849 m² to be zoned Mixed Use Zone 2 (MU2) to permit business premises (e.g. offices, shops, restaurant(s), supermarket etc.) and industry (warehousing) and offices.

See Figure 22. Refer to Plan of Subdivision (**Annexure D**). Annexures E.1 to E.4 represent the draft diagrams to be submitted to the Surveyor General for approval, should this application be approved.

8.1.7. Regulation Departures

In terms of Section 42(b) of the MPBL, permanent departures are requested from the following DMS provisions to enable operational efficiency, functional access, and active edge creation within the constrained urban context of Woodstock:

- Item 64(b): To permit portions of Site A’s existing buildings to encroach within the 8 m street centreline setback along Beach Road.
- Item 64(c): To permit a 0 m setback from the street boundary for portions of Site A’s existing buildings above 10 m in height, instead of 4.5 m.
- Item 60(e)(ii): To allow parking bays at ground level to be located approximately 4 m from the Beach Road boundary in lieu of the 10 m requirement.
- Item 140(2)(a): To permit multiple vehicular crossings per street frontage:
 - Beach Road: 5 crossings
 - Railway Street: 2 crossings.

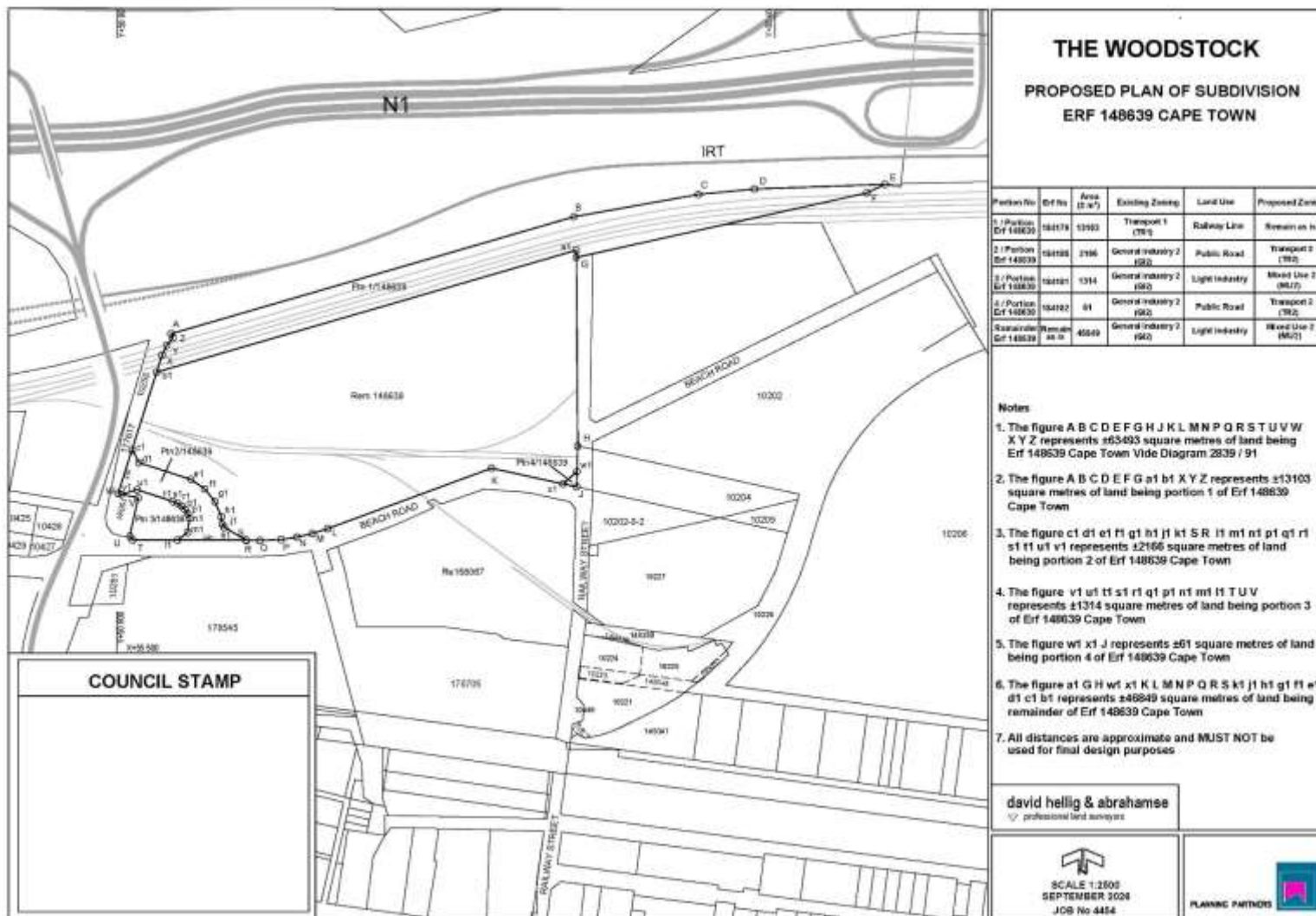


Figure 22:Rezoning of Erf 148629 Cape Town to Subdivisional Area Overlay Zoning and Subdivision into 4 Portions and a Remainder

8.2. Servitude Acknowledgement

- An existing servitude over Erf 148639 (SG Diagram A2988/1929) has been confirmed (**Annexure P**).
- The Surveyor-General is updating the diagram accordingly.
- No permanent structures encroach into the servitude area.

In addition, a $\pm 2\,166\text{ m}^2$ right-of-way servitude will be registered in favour of the City of Cape Town, to accommodate the quarter-link ramp over Portion 2 of Erf 148639. Note that the extent of Portion 2 to be confirmed at a later stage once the detailed design of the quarter link has been completed. Currently the indicated extent is sufficient to meet the City of Cape Town's requirements, with respect to the quarter link and its intersection with both Beach Road and the Lower Church Street bridge.

9. MOTIVATION FOR APPROVAL

9.1. Introduction

This section motivates for approval of the composite land use application in terms of Section 99 of the City of Cape Town Municipal Planning By-Law (MPBL). It demonstrates compliance with Section 99(1), evaluates policy alignment, and assesses desirability with reference to socio-economic, environmental, spatial and contextual considerations.

The proposal gives practical effect to the City's objectives of spatial justice, economic inclusion and sustainable urban regeneration by unlocking well-located, underutilised PRASA-owned land within the Urban Inner Core (UIC). It represents a strategic intervention that leverages public land to deliver affordable housing, employment opportunities and a revitalised public realm in a location already supported by bulk infrastructure and high-order public transport investment.

9.2. Compliance with the Provisions of the Municipal Planning By-Law

9.2.1. Minimum Requirements for an Application in Terms of Section 99(1)

(b) Consistent with the Cape Town Spatial Development Framework

The subject sites are located within the UIC, a priority investment area identified in the MSDF for intensification, mixed-use development and transit-oriented growth.

While the proposed development is not consistent with the MSDF: Policy 4 requires preservation of well located, well established and well performing industrial areas and re-purposing of general industrial 2 zoned land, the proposal aligns with these directives through:

- The transformation of fragmented, underutilised industrial and transport land into a coherent, TOD-aligned mixed-use precinct;
- Delivery of a balanced land use mix including retail, employment-generating activities and social/affordable rental housing;
- Creation of an activated pedestrian environment with improved walkability and NMT connectivity; and

- Strategic use of publicly owned land to advance socio-economic transformation objectives.
- Does not impact on the maritime cluster, boatbuilding and port activities. The proposal does, however, improve access arrangements to the broader precinct including boatbuilding enterprises that are located in the immediate surrounds of the site.

The proposal therefore directly supports the MSDF's goals of spatial integration, economic competitiveness and urban resilience.

Deviation from the MSDF is therefore required in the basis of site specific circumstances as required by Section 9 of the MPBL.

(d) Impact of permanent departure(s) relating to floor space and/or height

No departures are sought in respect of height or floor space, that warrant rezoning to the next sub-zoning.

9.2.2. Other Relevant Considerations in Terms of Section 99(2)

(a) Any applicable spatial development frameworks

- Table Bay District Spatial Development Framework (DSDF)

The proposals are not consistent with the spatial designation of the Table Bay DSDF that designates the site for industrial use and guidelines that apply to both industrial development areas and rail.

However, the proposals are aligned with the Table Bay DSDF that explicitly recognises the Woodstock–Salt River corridor as an area undergoing functional transition where mixed-use regeneration is appropriate, makes allowances for a greater mix of business activities provided that do not have a negative impact on the competitive advantage of industrial activities in the area and positively aligns with the Subdistrict 3 land use guidelines.

The site is no longer suitable for industrial due to:

- Immediate proximity to residential and mixed-use areas;
- Fragmented access and operational constraints affecting the performance of the industrial cluster; and
- Long-term decline in intensive industrial demand, with market shift to purpose-built industrial areas elsewhere, evidenced by the underutilized and dilapidated state of the site, due to lack of market demand from the industrial sector

The proposal responds appropriately by introducing compatible residential, retail and community uses that support regeneration, employment creation and social inclusion.

Deviation from the Table Bay DSDF is therefore required in the basis of site specific circumstances as required by Section 16 of the MPBL.

- Woodstock Salt River Local Spatial Development Framework (LSDF)

The proposals are not consistent with the spatial designation of the Woodstock Salt River LSDF that designates the site for industrial use and guidelines that apply to both industrial development areas and rail.

However the proposals are aligned with the LSDF policy principles and guidelines insofar as they promote:

- The redevelopment of PRASA properties that are identified for redevelopment and intensification;
- Provision of a variety of spaces for a diverse mix of businesses;
- Prioritise NMT through improved road infrastructure and safety in a location within proximity of a range of public transport opportunities;
- Providing for affordable housing near public transport and amenities;
- Promote mixed use intensification and redevelopment within TOD nodes
- Presents infill development and densification within walkable and well located precincts
- Integration of heritage assets into the redevelopment of the site;
- Improving the public realm through landscaping;
- Retention of the primary industrial use rights through selection of the flexible MU2 zoning.

Deviation from the Woodstock Salt River LSDF is therefore required in the basis of site specific circumstances as required by Section 16 of the MPBL.

(b) Compliance with the provisions of the Development Management Scheme

The proposal complies substantially with MU2 zoning parameters. Limited departures relating to building lines and vehicular crossings are contextually justified on urban design, operational and TOD grounds.

(c) Any applicable policy to guide decision making

The proposal is supported by the following guiding policies:

- MSDF (2023) – UIC regeneration and mixed-use intensification;
- Table Bay LSDF (2023) – corridor-based regeneration;
- Woodstock–Salt River LSDF (2023) – mixed-use transition and informal trading opportunities;
- TOD Strategic Framework – intensification around rail and BRT;
- Draft Inclusionary Housing Policy – direct delivery of affordable housing;
- Inclusive Economic Growth Strategy – job creation and area-based regeneration.

(d) Extent of desirability

Desirability is assessed in detail under **sub-section 9.2.4** below.

(e) Impact on existing rights

The transition from industrial (GI2) to mixed-use (MU2) rights introduces flexibility while retaining the option for compatible light-industrial, business, and residential activities. This basket-of-rights approach supports adaptability, ensuring alignment with market and funding conditions.

The application does not impact on the existing rights of surrounding property owners.

(f) Criteria to be taken cognizance of if consolidation is involved

The consolidation of Site B is essential for the delivery of a coherent residential development that is supported by shared amenities and efficient servicing. It enables:

- Spatial integration of affordable housing in the inner city;
- Optimal site utilisation and planning certainty;
- Streamlined approval and implementation processes.

The consolidated cadastral unit will facilitate the implementation of layered public/private partnerships involving *PRASA* and *Abshef 62, supported by MPi Woodstock, a subsidiary of Mpi*, in collaboration with *Abcon Developments*.

A detailed assessment of the proposed scale, building massing, and contextual impacts—as required in terms of Sections 71 and 99(2)(f)(2) of the Municipal Planning By-Law. —is provided in **Section 9.2.3**.

(g) Other considerations prescribed in relevant national or provincial legislation

The development proposal adheres to the following development principles outlined in **Section 7 of SPLUMA** and **Section 59 of LUPA**:

- *Principle of spatial justice*

Through the inclusion of social and affordable housing on well-located land, the project redresses historic spatial inequalities and promotes equitable access to urban opportunities.

- *Principle of spatial sustainability*

The proposal supports sustainable densification in a walkable, serviced location without compromising environmental assets or municipal infrastructure.

- *Principle of efficiency*

The site's reuse and intensification improve the cost-effectiveness of municipal services, public infrastructure, and land productivity.

- *Principle of spatial resilience*

The mixed-use nature of the precinct strengthens its ability to adapt to social, economic, and environmental challenges.

- *Principle of good administration*

The application was submitted with all necessary supporting documentation and follows the due process stipulated in the City's MPBL and SPLUMA regulations.

These principles underpin the development's long-term public value and sustainability.

9.2.3. Massing, Scale and Impact Assessment (Site B Consolidation)

In accordance with Sections 71 and 99(2)(f)(2) of the MPBL, the consolidation and rezoning of Site B have been assessed with specific reference to:

- (i) *the scale and design of the proposed development,*
- (ii) *the impact of the building massing and overshadowing, and*
- (iii) *the impact on surrounding properties.*

- **Existing Context and Development Rights**

Site B currently accommodates low-intensity industrial storage and packaging uses under GI2 zoning (FF 1.0; max height 18 m).

Surrounding properties to the north, north-east, and west are occupied by single- and double-storey industrial buildings of similar scale. Approximately 100 m south-east of the site is an existing multi-storey residential development that establishes an appropriate contextual benchmark for mixed-use transition (indicated with a “1” in a black circle on

Proposed Development Parameters and Comparison

Under the proposed MU2 zoning, Site B would allow a maximum floor-factor of 4.0 and a height of 25 m. **Figure 23** illustrates a comparative massing diagram contrasting the current GI2 envelope (see photo insert in top right corner) with the proposed MU2 envelope (bottom right corner). The consolidation and rezoning enable the introduction of a medium-density social and affordable housing development comprising approximately 299 units across 5 to 6 storeys, with ground-floor community amenities and landscaped courtyards.

(i) Scale and Design Considerations

With reference to the residential developments along Strand Street, the proposal will produce a building similar in height and use. In a south (green dotted arrow) and south-eastern (light blue solid-fill arrow) direction, the proposal will blend with existing scale and design considerations associated with the area (see **Figure 23**).

The proposed development adopts a courtyard-centric configuration, balancing efficient land-use intensity with spatial quality. Building envelopes range between 5 and 6 storeys (maximum 25 m), stepping down along site edges adjoining existing industrial structures. Roof articulation references the area’s industrial vernacular through dual-pitched and segmented saw-tooth forms, reinforcing visual continuity within the Woodstock–Salt River context.

This approach allows the scheme to mediate between the larger industrial sheds to the north and the finer-grained residential environment to the south-east, achieving a coherent, human-scaled edge condition.

(ii) Impact of the building massing and overshadowing

The massing has been designed to create a legible transition between the lower-scale industrial structures to the north and west and the taller mixed-use and residential buildings towards the south-east (see yellow solid-line arrow in **Figure 23**). Building heights taper along the site edges to mitigate overshadowing and maintain an appropriate street interface. The maximum height of 25 m is consistent with MU2-zoned erven along Strand Street across the railway corridor, ensuring policy and contextual parity.

The shadowing study confirms (see **Figure 25**):

- No overshadowing of adjacent properties for Site A at any time of year;
- Minimal to negligible overshadowing for Site B, limited to the adjoining service road during early-morning winter conditions; and
- No interruption of southern view corridors across the Cape Docks, as the proposed ridge line remains approximately 3 m lower than that of neighbouring warehouses (≈16 m high) located 3 m above Site B’s platform level (see **Figure 26**).

These findings demonstrate full compliance with solar-access objectives and confirm that the development will not adversely affect the amenity or daylight access of neighbouring properties.

(iii) Impact on Surrounding Properties and Heritage Sensitivity

The project's contextual appropriateness (Sites A and B) is reinforced by its position within a predominantly industrial and transport-oriented urban fabric, characterised by large infrastructural elements and limited heritage sensitivity.

Archival research identified the historical Craig's Battery beneath an existing warehouse footprint (Site A). In recognition of this latent heritage value, the design incorporates a contemporary interpretation tower, envisaged as a small educational feature commemorating the site's defensive and maritime history.

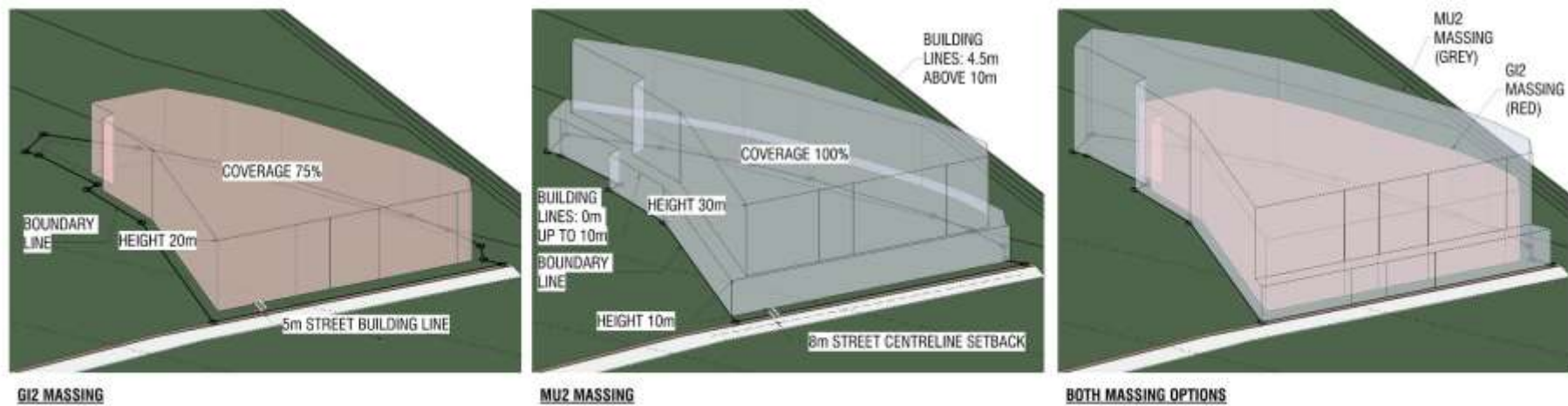
Existing southern dwellings, though not formally protected, will be retained and rehabilitated, preserving the layered spatial identity of the precinct. The alignment of Tide Street, once marking the tidal boundary, has been respected and left spatially legible within the development footprint (Site A).

Table 10: Comparison of Existing Development Rights (GI2) and Proposed Development Parameters (MU2) – Site B

Category	Existing GI2 Rights	Proposed MU2 Development	Implications / Rationale
Primary Uses Permitted	Industrial buildings; service trade; warehousing; limited ancillary offices. <i>Residential uses not permitted.</i>	Flats; business premises; community facilities; institutional uses; utility services; light/service-industrial components.	MU2 enables delivery of 299 social and affordable rental units and community amenities while retaining long-term flexibility for compatible industrial uses.
Height	Max 20 m (all buildings not used for manufacturing purposes).	Max 25 m (30 m under MPBL 2025) (±5–6 storeys), reducing along edges.	Allows context-appropriate massing aligned with TOD and LSDF guidance; stepped form mitigates overshadowing and transitions between industrial and residential edges.
Floor Factor	4.0	4.0	Enables efficient land use on an inner-city site, supporting medium-density social housing and mixed-use integration.
Coverage	75%.	100% permitted, though proposal uses ±65–70% to provide courtyards and open space.	Increased coverage permitted but design intentionally provides landscaped communal space and public interface.
Massing Potential (Envelope)	Lower-scale industrial sheds or warehouses; limited verticality; typically monotonic built form.	5–6 storey perimeter and courtyard buildings; articulated façades and roof forms referencing industrial vernacular.	MU2 supports a coherent, human-scaled mixed-use precinct with improved interface conditions.
Overshadowing / Solar Access	Similar overshadowing and solar access due to 20m height.	Shadow impact limited to early-morning winter periods over adjoining service lanes; no impact on residential neighbours or Cape Docks view corridors.	Complies with solar-access considerations; shadowing study confirms no adverse effects.
Surrounding Context Compatibility	Industrial character consistent; no residential interface permitted.	Compatible with emerging mixed-use transition in Woodstock/Salt River; mediates between industrial buildings (north/west) and residential uses (south-east).	Provides an appropriate transitional built form within a precinct shifting toward mixed-use intensification.
Heritage Considerations	No heritage requirements under existing GI2 conditions.	Includes retention of southern dwellings, legibility of historical Tide Street line, and interpretation of Craig's Battery through a contemporary tower.	MU2 allows heritage-sensitive urban regeneration and integration of cultural landscape elements.
Land Use Flexibility	Limited to industrial or service-trade functions.	Allows evolving mix of residential, non-residential, community, and service-industrial uses.	Supports long-term adaptability and investment certainty within the Urban Inner Core.



Figure 23: Artist impression of massing (Site B)



GI2 MASSING ENVELOPE:

- FLOOR FACTOR: 4.0
- HEIGHT: 20m (previous MPBL height of 18m)
- COVERAGE: 75%
- STREET BUILDING LINE: 5m

MU2 MASSING ENVELOPE:

- FLOOR FACTOR: 4.0
- HEIGHT: 30m (previous MPBL height of 25m)
- COVERAGE: 100%
- BUILDING LINES: 0m UP TO 10m HEIGHT, THEN 4.5m building line above 10m
- 8m STREET CENTERLINE SETBACK

BAR Architects
Architects & Planners

MPI
Aabcon

A
2023-2024

A10 080
SITE B MASSING COMPARISON
NTS

THE WOODSTOCK
SITE B

This drawing is not to be used for construction. It is for informational purposes only. All dimensions and materials are subject to change without notice. The drawings are not to be used for construction. The drawings are not to be used for construction. The drawings are not to be used for construction.

Figure 24: Massing Diagram (Site B)

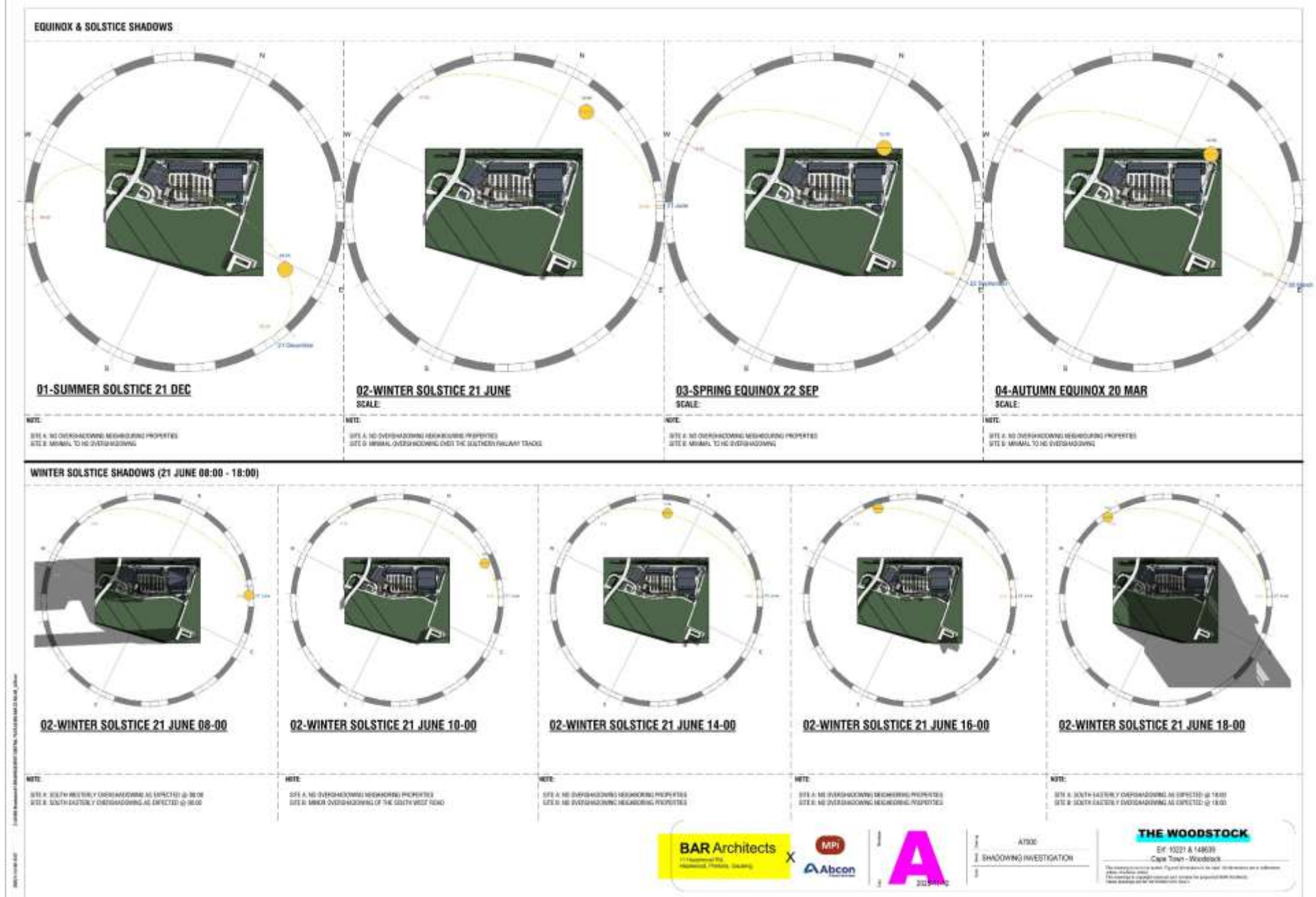
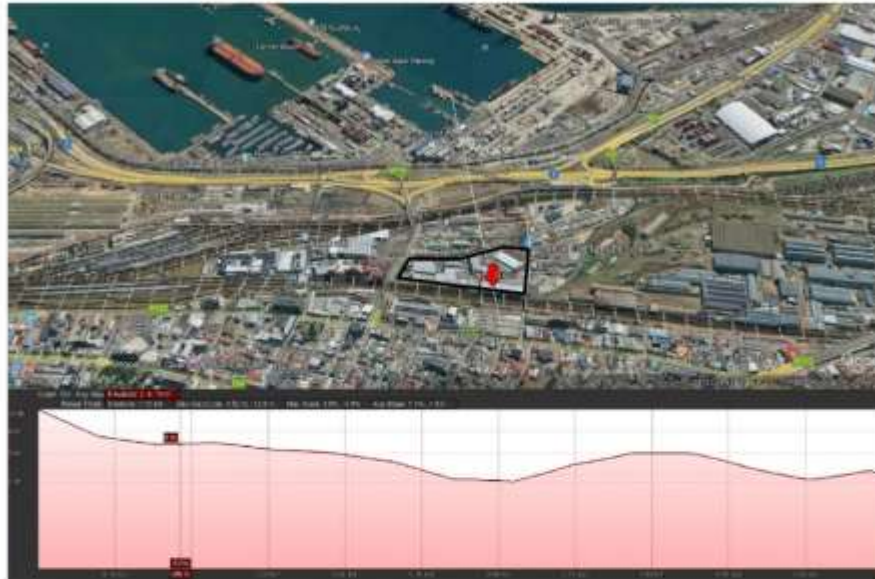


Figure 27: Shadowing investigation

EXISTING SOUTHERN NEIGHBORS



MAJOR VIEW PATHS TAKEN NORTH OVER THE CAPE DOCKS:
THE SOUTHERN NEIGHBORS ARE OVER 3m ABOVE OUR
PROPOSED SITE AND HAVE A WAREHOUSE WITH NO SECOND
FLOOR WINDOWS @ ROUGHLY 9m IN HEIGHT.

PROPOSED SITE



MAJOR VIEW PATHS TAKEN NORTH OVER THE CAPE DOCKS:
WITH THE HIGHEST 16m BUILDING RIDGE LINE BEING ±3m LOWER THAN
THE SOUTHERN NEIGHBORS NO SIGHT LINES WILL BE INTERRUPTED
FURTHER THAN WHAT IS CURRENTLY EXPERIENCED.



BAR Architects
111 Industrial Rd.
Bendigo, Victoria, Australia

MPi
Aabcon
Construction

A
2024

67180
SIGHTLINE INVESTIGATION
1:1

THE WOODSTOCK

Lot 10221 & 148233
Cape Town - Woodstock

This drawing is not to be used for any other purpose than the intended use. All dimensions are in millimeters unless otherwise stated. The drawing is intended to provide a visual representation of the proposed development. It is not a guarantee of any kind.

Figure 28: Sightline investigation

9.2.4. Desirability of the Land Use Contemplated Section 99(3) of the MPBL

(a) Socio-economic impact

The development will:

- Job creation during construction and operation;
- ±280-300 affordable housing opportunities, improving access to the inner city;
- New retail and service employment supporting local economic growth (including space for informal trading);
- Increased municipal revenue through rates and service charges; and
- Improved area safety and activation, especially after hours, through increased residential presence and passive surveillance.

(d) Compatibility with surrounding land uses

Key compatibility attributes include:

- MU2-consistent height and scale, matching adjacent MU2-zoned erven along Strand Street;
- Architectural articulation and landscaping that buffer remaining industrial interfaces;
- Active edges and transparent façades enhancing pedestrian experience; and
- Integrated pedestrian and NMT connections linking to BRT, rail, and taxi nodes.

(f) Impact on safety, health and wellbeing of the surrounding community

The development introduces eyes-on-the-street through active frontages, ground-floor retail, and housing overlooking public spaces. Key measures include:

- Clearly defined pedestrian and service routes;
- Lighting, landscaping, and universal accessibility design;
- Improvement to the general safety through overlooking features and upgraded public and the public accessible realm;
- The integration of residential uses as a stabilising social presence; and
- Consistency with OHS and building control standards.
- The SRK geotechnical investigation confirms historic fill, shallow groundwater and isolated contamination. This necessitates comprehensive remediation, which is integrated into the proposal.

This mixed-use activation contributes positively to community wellbeing and local identity. Short-term construction impacts will be mitigated through phased implementation and adherence to Occupational Health and Safety (OHS) regulations.

(g) Impact on heritage

No declared heritage constraints. HIA has been submitted to HWC. The proposal includes meaningful heritage buildings within the design of the proposal and therefore contributes to preservation of industrial heritage resources.

(h) Impact on the biophysical environment

The proposal does not present a negative impact on the biophysical environment, as the proposal is a redevelopment of a brownfields site, that has been utilized for industrial purposes.

- **Site Conditions and Environmental Baseline**

The geotechnical investigation identified the following environmental characteristics relevant to biophysical impact:

- A highly variable, uncontrolled fill layer averaging approximately 1.7 m in depth across the site, comprising rubble, coarse material, organic matter and locally contaminated soils;
- Shallow groundwater levels, encountered between approximately 1.6 m and 2.6 m below surface, requiring careful stormwater management and construction controls;
- Evidence of historic railway infrastructure beneath fill layers, reinforcing the site's legacy industrial and transport function; and
- A restricted-access area containing a burnt structure.

These conditions confirm that unmanaged or incremental redevelopment would pose environmental and health risks. However, they also demonstrate that a coordinated, platform-based redevelopment—supported by formal environmental controls—provides a substantially improved environmental outcome compared to the existing condition.

- **Site Layout and Massing as Environmental Buffers:**

The proposed site layout and massing strategy plays a central role in mitigating biophysical impacts. Commercial, retail, warehousing and service-oriented components are intentionally located along Beach Road and Lower Church Street, forming a built buffer between remaining industrial activities and the residential component on Site B. This spatial arrangement reduces the direct exposure of residential units to residual noise, dust and operational activity associated with surrounding light-industrial uses. While the precinct has a strong industrial legacy, the immediate surrounding environment now accommodates non-noxious, small-scale industrial, creative and service uses, with no heavy or noxious trades operating in close proximity to the site. The proposed land use structure therefore aligns with the current and emerging environmental character of the area.

- **Management of Noise, Dust and Air Quality Impacts**

Potential environmental impacts relating to noise, dust and air quality are assessed as localised, manageable and capable of mitigation through the following measures, including:

- Building orientation and internal DMS-compliant setbacks that reduce direct exposure to external noise sources;
- Strategic use of landscaping buffers, including tree planting and vegetated edges, to intercept dust and improve microclimatic conditions;
- Incorporation of green infrastructure such as Sustainable Urban Drainage Systems (SUDS), landscaped courtyards, permeable surfaces and, where feasible, green roofs, which assist in dust suppression, temperature regulation and improved air quality; and
- The preparation and implementation of a Construction Environmental Management Plan (CEMP) to manage temporary construction-phase impacts.

- **Building Design and Construction Response**

The geotechnical findings directly inform the proposed building design and construction methodology. As part of the detailed design and building plan stage, the following measures may be incorporated where required to ensure environmental health and residential amenity:

- Removal and disposal of unsuitable or contaminated fill in accordance with national environmental and occupational health legislation;
- Construction of a fully engineered building platform, reducing dust generation and preventing differential settlement;
- Use of acoustic glazing, insulation and façade treatments to mitigate external noise intrusion where residential units are located closest to activity edges;
- Consideration of sealed building envelopes and mechanical ventilation systems for units exposed to higher background noise or dust levels, if required by specialist assessments; and
- Specification of durable, low-dust external materials to minimise maintenance and particulate accumulation.

- **Landscaping and Public Realm as Environmental Mitigation**

Landscaping is deployed not only as an urban design tool, but also as a key environmental mitigation mechanism. Measures include:

- Dense vegetation and street trees along key edges to capture airborne dust and filter pollutants;
- Landscaped courtyards within the residential component to create sheltered, lower-noise microclimates;
- Replacement of degraded hardstand and informal truck parking areas with structured development and green space, thereby reducing dust generation and surface heat.

- **Air Quality and Climate Responsiveness**

The proposal contributes positively to local air quality and climate resilience through:

- Integration of green infrastructure to mitigate the urban heat island effect;
- Promotion of non-motorised transport and transit-oriented living, reducing reliance on private vehicles and associated emissions;
- Proximity to rail and MyCiTi services, supporting modal shift away from private car use.

- **Construction Phase Environmental Controls**

A Construction Environmental Management Plan (CEMP) will be implemented to manage short-term impacts during demolition, remediation and construction, including:

- Dust suppression measures such as wetting down of exposed surfaces and covering of trucks;
- Scheduling of construction activities to limit noise during sensitive periods;
- Maintenance of construction machinery to minimise emissions and noise; and
- Strict access control and health and safety protocols, particularly in areas of known contamination.

- **Monitoring and Adaptive Management**

Where required, environmental monitoring may be undertaken during critical phases of development to assess noise, dust and air quality levels. This will ensure compliance with applicable SANS standards, municipal environmental health requirements, and occupational health regulations, and will allow adaptive management should unforeseen impacts arise.

- **Compatibility with the Evolving Precinct Context**

While surrounding land uses currently include industrial and service-industrial activities, the broader Woodstock–Salt River corridor is demonstrably transitioning toward mixed-use redevelopment, which will, over time, further reduce industrial emissions, noise and environmental stressors. The proposed development actively supports this transition by replacing degraded, contaminated and underutilised land with a regulated, remediated and environmentally managed urban precinct. By integrating the findings of the SRK geotechnical investigation with a comprehensive design, remediation and management response, the proposal ensures that potential biophysical impacts are identified, mitigated and responsibly managed. The development will result in a net environmental improvement compared to the existing condition of the site, delivering a safe, healthy and liveable environment for residents and users while supporting the precinct's transformation into a mixed-use, inclusive and transit-oriented node.

This approach is fully aligned with the principles of spatial justice, sustainability and resilience set out in Section 7 of SPLUMA and Section 59 of LUPA, and supports informed, risk-aware decision-making by the City.

(i) Traffic impacts, parking, access and other transport related considerations

A TIA prepared by professional consultants confirms that the proposed access arrangements, parking supply (±719 bays on Site A; ±23 on Site B) , and intersection designs are acceptable. Key features include:

- Separate logistics access via Tide Street;
- Pedestrian-prioritised circulation near the retail/restaurant terraces;
- Adequate stacking distance and circulation for delivery vehicles;
- Public transport accessibility due to proximity to rail and MyCiTi services.

Where parking bay setbacks and carriageway widths deviate from the DMS, they are supported by operational and design rationales.

(j) Whether the imposition of conditions can mitigate an adverse impact of the proposed land use

Any potential adverse impacts can be mitigated through appropriate conditions addressing:

- Engineering service implementation;
- Phased construction management;
- Landscaping and environmental measures; and
- Compliance with safety and OHS standards.

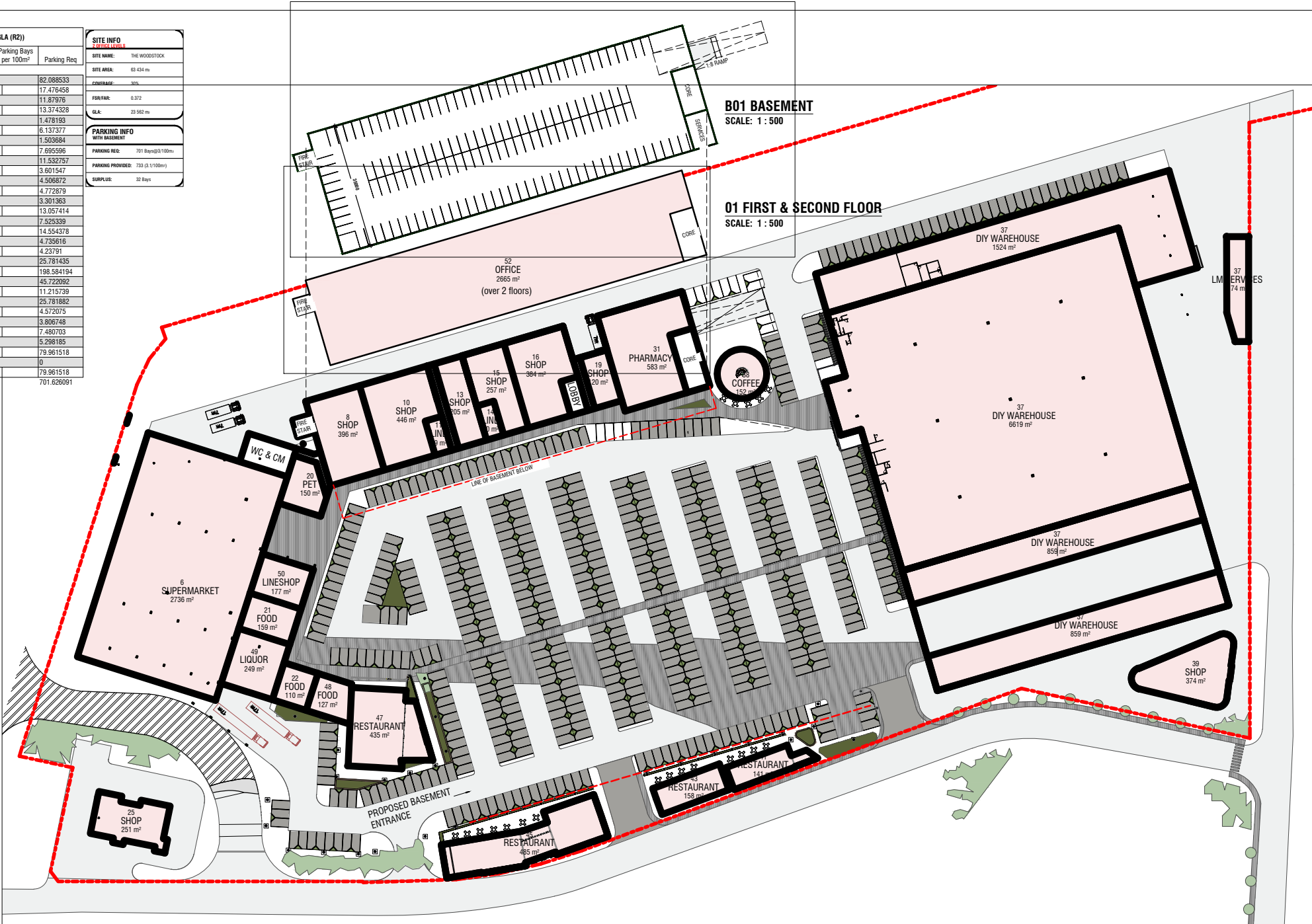
10. CONCLUSION

The development proposal represents a contextually appropriate, well-located and policy-aligned mixed-use development within the Woodstock–Salt River precinct. The project unlocks underutilised PRASA-owned land within the Urban Inner Core to deliver transit-oriented development, including approximately 280–300 social and affordable rental housing units, employment-generating retail uses, and an activated public realm. The proposal will stimulate local economic growth, improve safety through increased after-hours activity, and enhance accessibility to the wider Beach Road precinct through the proposed quarter-link and associated infrastructure upgrades. This report has demonstrated that the application complies with the decision-making criteria in Section 99 of the Municipal Planning By-Law and is supported by applicable spatial policy frameworks and specialist studies. It is therefore respectfully requested that the City of Cape Town approves the application.

Area Schedule (GLA (R2))			
Name	Area	Parking Bays per 100m²	Parking Req

SUPERMARKET	2736 m²	3	82.088533
PHARMACY	583 m²	3	17.476458
SHOP	396 m²	3	11.87976
SHOP	446 m²	3	13.374328
LINE	49 m²	3	1.478193
SHOP	205 m²	3	6.137377
LINE	50 m²	3	1.503684
SHOP	257 m²	3	7.695596
SHOP	384 m²	3	11.532757
SHOP	120 m²	3	3.601547
PET	150 m²	3	4.506872
FOOD	159 m²	3	4.772879
FOOD	110 m²	3	3.301363
RESTAURANT	435 m²	3	13.057414
SHOP	251 m²	3	7.525339
RESTAURANT	485 m²	3	14.554378
RESTAURANT	158 m²	3	4.735616
RESTAURANT	141 m²	3	4.23791
DIY WAREHOUSE	859 m²	3	25.781435
DIY WAREHOUSE	6619 m²	3	198.584194
DIY WAREHOUSE	1524 m²	3	45.722092
SHOP	374 m²	3	11.215739
DIY WAREHOUSE	859 m²	3	25.781882
COFFEE	152 m²	3	4.572075
FOOD	127 m²	3	3.806748
LIQUOR	249 m²	3	7.480703
LINESHOP	177 m²	3	5.298185
OFFICE	2665 m²	3	79.961518
DIY WH SERVICES	174 m²	0	0
OFFICE	2665 m²	3	79.961518
Grand total	23562 m²		701.626091

SITE INFO	
2 OFFICE LEVELS	
SITE NAME:	THE WOODSTOCK
SITE AREA:	63 434 m²
COVERAGE:	30%
FSR/FAR:	0.3/2
GLA:	23 562 m²
PARKING INFO	
WITH BASEMENT	
PARKING REQ:	701 Bays@0.1/100m²
PARKING PROVIDED:	733 (0.1/100m²)
SURPLUS:	32 Bays



00 GROUND FLOOR
SCALE: 1 : 500

BAR Architects
11 Hazelwood Rd,
Hazelwood, Pretoria, Gauteng

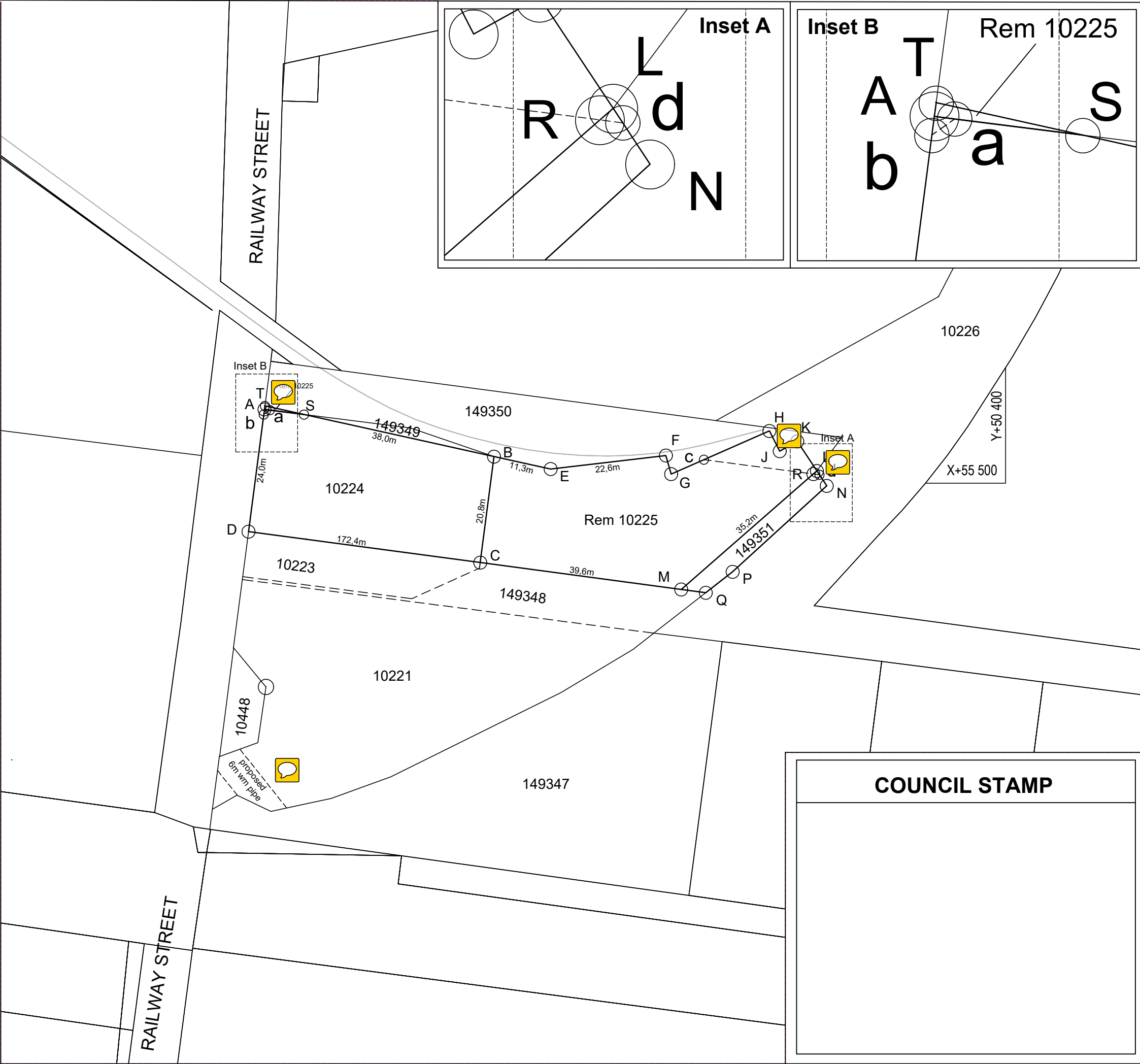


Revision	A8001
Scale	As indicated
Sheet	SITE PLAN

THE WOODSTOCK

Erf: 10221 & 148639
Cape Town - Woodstock

This drawing is not to be scaled. Figured dimensions to be used. All dimensions are in millimeters unless otherwise stated.
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THE WOODSTOCK
SUBDIVISION OF ERVEN
10224, 10225 and 149351
CAPE TOWN

Portion No	Area (± m²)	Existing Zoning	Existing Land Use
1 / 10224	0,5	General Industry 2 (GI2)	Private Road
Rem Erf 10224	1039,5		Cement Works
1 / Rem Erf 10225	87		Private Road
2 / Rem Erf 10225	3		Private Road
Rem Erf 10225	1171		Cement Works
1 / 149351	0,4		Private Road
Rem Erf 149351	125		Cement Works

- Notes
- The figure A B C D represents Erf 10224 Cape Town being ± 1040 square metres of land Vide Diagram A3966/27 which is to be subdivided as shown
 - The figure A a b represents Portion 1 of Erf 10224 Cape Town being ± 0,5 square metres in extent
 - The figure a B C D b represents Rem of Erf 10224 Cape Town being ± 1039,5 square metres in extent
 - The figure A T S & B E F G H J K L M C represents Rem Erf 10225 Cape Town being ± 1261 square metres of land which is a split remainder Vide Diagram 3429 / 1898 which is to be subdivided as shown
 - The figure c H J K L R represents Portion 1 of Erf 10225 Cape Town being ± 87 square metres in extent
 - The figure A T S represents Portion 2 of Rem Erf 10225 Cape Town being ± 3 square metres in extent
 - The figure L N P Q M represents Erf 149351 Cape Town being ± 125 square metres of land Vide Diagram 10196/1991 which is to be subdivided as shown
 - The figure R L d represents Portion 1 of Erf 149351 Cape Town being ± 87 square metres in extent
 - The figure R d N P Q M represents Rem of Erf 149351 Cape Town being ± 125,4 square metres in extent
 - All distances and areas are approximate and MUST NOT be used for final design purposes

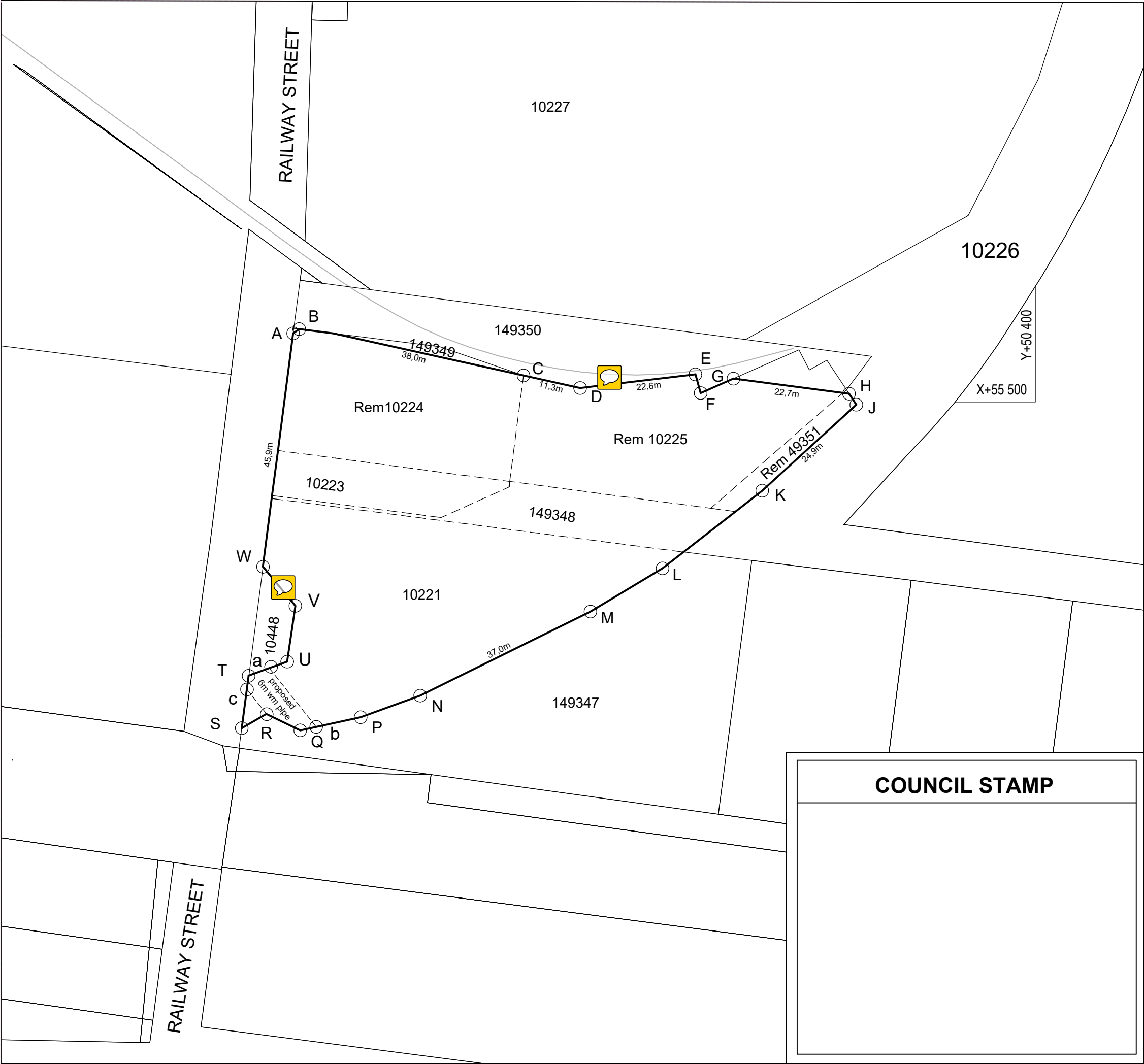


SCALE 1:750
JUNE 2026
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FIGURE 1

PLANNING PARTNERS





THE WOODSTOCK

**AMENDED PLAN OF CONSOLIDATION
& REZONING OF ERVEN 10221,
10223, Rem 10224, Rem 10225, 149348 &
Rem 149351 CAPE TOWN**

Erven to be Consolidated	Area (± m²)	Existing Zoning	Land Use	Proposed Zoning
10221, 10223, Rem 10224, Rem 10225, 149348 & Rem 149351	5263	General Industry 2 (GI2)	Vacant / Cement Works	Mixed Use 2 (MU2)

Notes

1. The figure A B C D E F G H J K L M N P Q R S T U V W represents ± 5263 square metres of land being the consolidation of Erven 10221, 10223, Rem 10224, Rem 10225, 149348 & Rem 149351 Cape Town
2. The figure T a b Q R c represents a 6m wm pipeline servitude in favour of City of Cape Town
3. All distances & areas are approximate and MUST NOT be used for final design purposes

COUNCIL STAMP

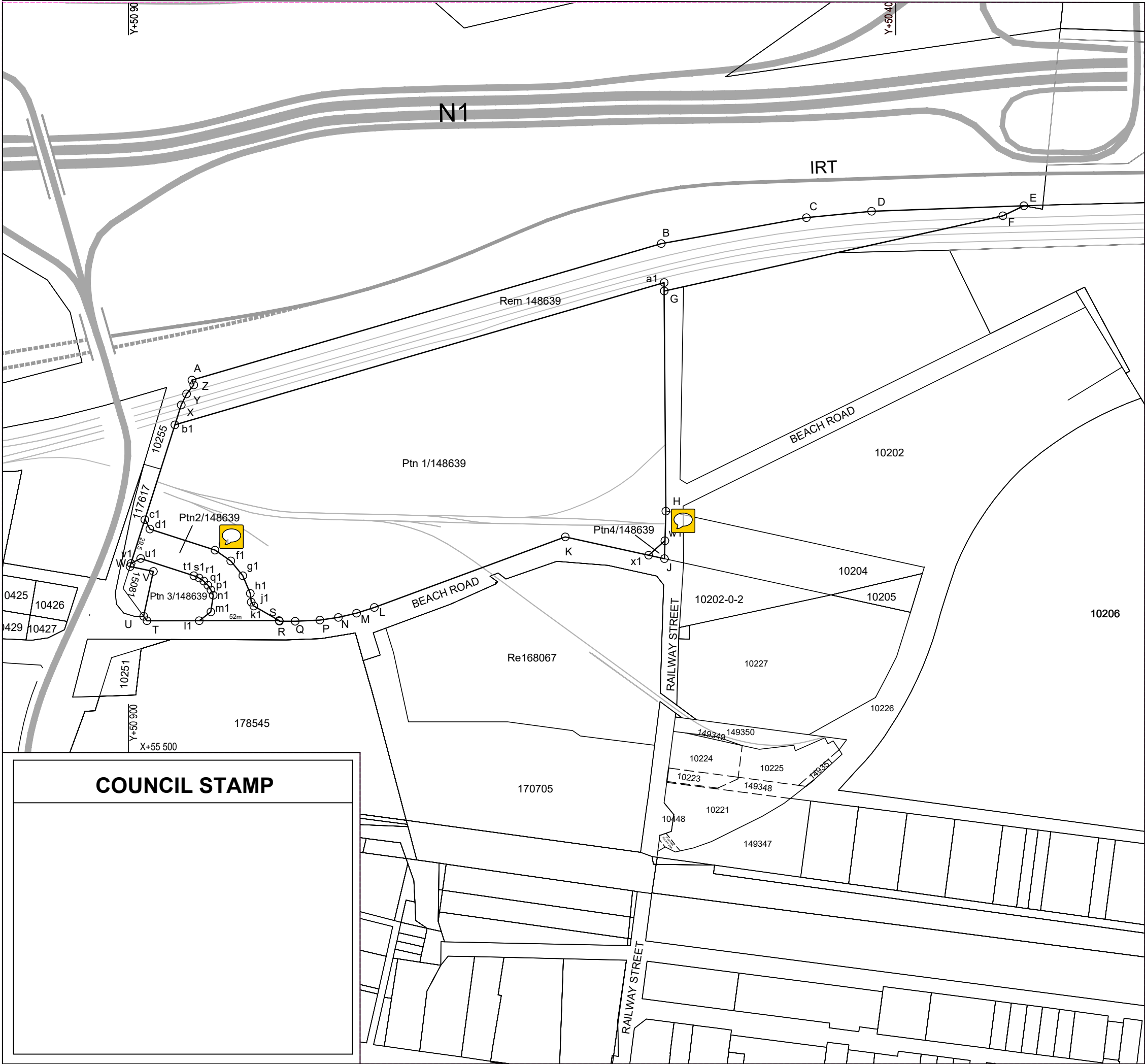


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FIGURE 2

PLANNING PARTNERS





THE WOODSTOCK

PROPOSED PLAN OF SUBDIVISION
ERF 148639 CAPE TOWN



Portion No	Erf No	Area (± m²)	Existing Zoning	Land Use	Proposed Zoning
1 / Portion Erf 148639	X	46870	General Industry 2 (GI2)	Light Industry	Mixed Use 2 (MU2)
2 / Portion Erf 148639	X	2106	General Industry 2 (GI2)	Light Industry	Transport 2 (TR2)
3 / Portion Erf 148639	X	1350	General Industry 2 (GI2)	Light Industry	Mixed Use 2 (MU2)
4 / Portion Erf 148639	X	60	General Industry 2 (GI2)	Light Industry	Transport 2 (TR2)
Remainder Erf 148639	X	13107	Transport 1 (TR1)	Railway Line	Remain as is

Notes

1. The figure A B C D E F G H J K L M N P Q R S T U V W X Y Z represents ±63493 square metres of land being Erf 148639 Cape Town Vide Diagram 2839 / 91
2. The figure a1 G H w1 x1 K L M N P Q R S k1 j1 h1 g1 f1 e1 d1 c1 b1 represents ±46870 square metres of land being portion 1 of Erf 148639 Cape Town
3. The figure c1 d1 e1 f1 g1 h1 j1 k1 S R l1 m1 n1 p1 q1 r1 s1 t1 u1 v1 represents ±2106 square metres of land being portion 2 of Erf 148639 Cape Town
4. The figure W v1 u1 t1 s1 r1 q1 p1 n1 m1 l1 T U V represents ±1350 square metres of land being portion 3 of Erf 148639 Cape Town
5. The figure w1 x1 J represents ±60 square metres of land being portion 4 of Erf 148639 Cape Town
6. The figure A B C D E F G a1 b1 X Y Z represents ±13107 square metres of land being Remainder Erf 148639 Cape Town
7. All distances are approximate and MUST NOT be used for final design purposes

david hellig & abrahamse
▽ professional land surveyors



SCALE 1:2500
JULY 2026
JOB No 4454

PLANNING PARTNERS



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