



OBSERVATORY

Civic Association

60 Trill Road
Observatory
7925
30th January 2022

To whom it May Concern: COMMENT ON A PLAN IN TERMS OF THE CITY OF CAPE TOWN'S MUNICIPAL PLANNING BY-LAW, 2015 INDICATING THE AREAS THE CITY DEEMS TO BE SUBJECT TO PUBLIC TRANSPORT (PT1 & PT2) REDUCED OFF-STREET PARKING REQUIREMENTS AND A PROPOSED AMENDMENT TO THE BY-LAW TO RECORD THE PLAN

The Observatory Civic Association wishes to note the following comments on the proposed reduction in off-street parking proposed as a plan to be incorporated in the Municipal Planning By-law as advertised.

1. It is noted that the proposed PT1 and PT2 categorisations render most of Observatory a PT2 category. This means that **any developments, whether small or large, will not be required to provide off-street parking**. This will have major implications for an already densely populated suburb with narrow streets, often one-way and congested parking areas.
2. **The intent of the City to promote public transport is a desirable policy objective.** However, the use of parking zoning adjustment to encourage the use of public transport before such public transport is effectively in place is illogical and cannot be supported. Simply reducing off-street parking without addressing the provision of safe and reliable public transport will not reduce car use in the City but merely add to parking congestion on our roads.

3. **The provision of public transport to Observatory is mostly limited** to minibus taxis and Golden Arrow buses on Main Road. There is no MyCiTi route, and trains have become unreliable, with no sign of improvement. The train network is not favoured by users.
4. **There are few safe cycling routes from Observatory.** Dedicated cycle lanes are overtaken by motor vehicles or used by motor vehicles for parking and therefore largely unsafe to use.
5. **While the neighbourhood is largely walkable, this is obviously limiting** as most people need to travel to other centers of activity (for studying, working, shopping, leisure, etc.) daily.
6. **Generally, people who can afford to use other means of transport than minibus taxis will do so.** Due to property values in Observatory, a majority of residents can afford a vehicle, and therefore will own at least one car per household. This includes households which use public transport daily for commuting. This is likely because the available public transport, mostly minibus taxis, do not cover all the needs of the residents.
7. **Observatory is a recognised Heritage Protection Overlay Zone based on its Victorian village character.** The Victorian typology characteristic of Observatory does not originally allow for off-street parking. As a result, many residents have converted front gardens into parking bays (with gates preventing other users from parking in the street, whether the off-street parking is occupied or not) or have to park in the street. This does not translate as significantly less car presence in the streets of the neighbourhood. On the contrary, many streets are saturated with parked cars.
8. In other words, large parts of Observatory already function as a PT2 zone in terms of residential parking bays, but this does not result in significantly reduced car ownership.
9. **The consequences of imposing a PT2 categorisation** on an area marked for heritage preservation will undermine the capacity to preserve the Victorian character of the area as parking clutter forces homeowners into renovations inconsistent with the HPOZ.
10. **It is likely to increase the congestion of streets** because of an excess of street-parked cars. It is also likely to encourage developers to misuse the regulations to provide insufficient parking, without necessarily reducing the cost of ownership or rental. Historically, in Observatory, developers have sought to reduce parking requirements to reduce costs, including by lying about occupation types. For

example, the MPT recently levied an administrative penalty on a developer who claimed to be building a backpackers lodge to reduce their parking requirements, but marketed the building as flats from day one. While reduced parking requirements are sometimes justified, they should continue to be examined on a case-by-case basis.

11. **Observatory is growing.** Over the past few years, prior to COVID-19, Observatory has seen an increase in numbers of larger developments approved given its desirability as a residential base near the City Centre. Of the 11 large developments approved by the City since 2016, all have required off-street parking to be provided – in total approximately 960 parking bays have been approved for these development and provided. Had these developments been implemented under a PT2 area categorisation, we may have seen developers cut corners on their provision of parking and these hundreds of bays obviated, with the result that hundreds more cars belonging to residents of these developments, would have to find parking on the streets of Observatory. We do not think this is a wise urban planning strategy in general and it will be very damaging for the fabric of the Victorian village character of Observatory, and for the viability and diversity of businesses in the area, which may need customers to park nearby.
12. With regards to shared and public parking spaces, there are instances of **small, shared parking areas but this is not enough** to cater for the entire neighbourhood. It does not seem likely that new ones will be created under a PT2 zone. There are no large private car parks like in the CBD.
13. **The data may be misleading.** We assume the PT2 area proposal is based on large numbers for boarding / alighting buses and minibuses on Main Road Observatory. However, this does not tell the whole story. Where are users ultimately coming from and going to? What use do they make of the surrounding area?
14. We also draw your attention to the **inconsistency in the PT area categorisation** in different parts of Cape Town in the plan (see the figure below).
 - a. The stretch of Main Road north from Mowbray taxi rank is categorised as PT2 despite the fact there are no transport hubs in Observatory as is the case at Mowbray, Claremont and Wynberg. PT2 areas are generally earmarked for properties surrounding transports hubs.
 - b. The stretch of Main Road south from Mowbray is categorized as PT1 all the way through to Claremont. Since the train stations at Rosebank and Rondebosch, for example, are far closer to the Main Road (less than 100m)

than is the case in Observatory (about 400m distant), there is no logical reason why public transport should be “considered good” in Observatory. On the contrary, public transport in Observatory remains quite poor.

- c. The map also includes a large swathe of Observatory as a PT2 area. This is not a logical conclusion given that this is a Heritage Protection Overlay Zone.

	<p>No transports hubs in Observatory; yet deemed PT2; station is 400m away; train services not favoured for reasons of safety, unreliability; no MyCiti service</p> <p>Nearest transport hub is Mowbray</p>
	<p>Transport provision along Main Road from Mowbray to Newlands is no different to that in Observatory</p> <p>Claremont is a transport hub</p>
	<p>Wynberg is a transport hub</p>

15. While reducing the number of cars on the road by encouraging the use of public transport is an undeniably positive goal, **it has to start with the provision of public transport and non-motorised routes** that are safe, reliable, affordable and effective. Reducing the provision of parking bays before this is established is highly unlikely to have the desired effect.

In conclusion, in the case of Observatory, the provision of public transport is not sufficient to support a car-free neighborhood. Parking requirements are currently adequate and should remain as they are, and departure applications examined on a case-by-case basis until a good network of public transport and non-motorised routes is established. Any excess parking bays that may be created in the transition period can find a new use in the future, for example as shared parking once the PT2 becomes sensible.

We remain at your disposal for any clarification or further discussions.

Yours sincerely

Marine Leblond

on behalf of
Observatory Civic Association
Architecture & Heritage Committee