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**Clr V Penning**  
**Chairperson: Section 79 Finance Committee**  
**City of Johannesburg**  
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Dear Clr Penning

## **REVIEW OF CITY OF JOHANNESBURG METROPOLITAN MUNICIPALITY DRAFT SPECIAL RATING AREA BY-LAW & SPECIAL RATING AREA POLICY**

We represent SOJO Business and Tourism (SOJO) ([www.sojo.co.za](http://www.sojo.co.za)) a non-profit organisation established in the south of Johannesburg to promote economic growth and development, tourism and related business in recognition of the many economic opportunities and business nodes and that exist in the natural and man made tourism, recreation, and sporting facilities located in the south of Johannesburg and Soweto.

With reference to the current process of review of the City of Johannesburg Metropolitan Draft Special Rating Area By-Law & Special Rating Area Policy we wish to make the following submission for your consideration.

In making this submission, we emphasise that this submission is founded on our desire to assist and make available our knowledge and resources to the City in a cooperative, collaborative and constructive manner.

### **1. General Comment**

1. It is suggested that the City includes an opportunity for the building and recognition of an institutional structure which includes members who are representative of the



structures and organisations managing and running the established Special Rating Areas (SRAs).

2. This institutional structure should be used as an interface between the City and those involved in the place making industry.
3. Such a structure can be used to assist and support the City in developing the skills, processes, protocols and procedures of the people in the SRA structures and organisations.
4. It will provide an opportunity for collective collaboration between the City and property owners and a representative organisation in this rapidly growing and key industry .
5. An example of such an organisation is the Johannesburg CID Forum and initiatives of the Johannesburg In City Partnership.

## 2. Detailed Comments on the Draft Policy

SECTION	ISSUE/PARAGRAPH	COMMENT
Definitions	applicant	1. After “means any owner” insert “or duly appointed representative”.
1	INTRODUCTION	
	1.4	2. After “City’s Rates Policy” insert “and By-law”.
3	EXCLUSION	3. Surely the policy should apply to “privately-owned property developments or to gated developments” as the aim of the policy is fundamentally to provide mechanisms and instruments for private property owners to collaborate and partner with the City regarding urban management. 4. This requires definition and clarification. 5. This may have implications for the definition of “rateable property” particularly with regard to shared ownership such as sectional title.
4	POLICY STATEMENT	
	Paragraph 4.2.3	6. Remove “in the provision of” and replace with “to provide and supplement”.
	Paragraph 4.4	7. it is stated that the City will help “to capacitate management bodies”. Clarity is required regarding the role that the City will play in such assistance.
5	FACTORS CONSIDERED WHEN DETERMINING A	



SECTION	ISSUE/PARAGRAPH	COMMENT
	SPECIAL RATING AREA	
	Paragraph 5.6	<p>8. Clarity is required regarding “non-residential special rating area”, particularly with regard to buildings and properties with mixed uses and establishing their contribution to the “rates base value”.</p> <p>9. Consideration needs to be of the City planning and development policies which are strongly promoting densification and concentration of mixed uses.</p>
	Paragraph 5.7	<p>10. Clarity and consistency is required regarding the use of the terms “community consultation”, “members meeting” and “public meeting” which appear to be used interchangeably through the document.</p> <p>11. Are these one in the same thing or does it involve different groupings of people?</p> <p>12. It is suggested that the term should refer to the property owners and occupiers of rateable property.</p>
8	INSTITUTIONAL ARRANGEMENTS	
	Paragraph 9.1.8	13. Clarity is required regarding what the criteria and requirements are for the City to be “satisfied with the outcome”
10	BUSINESS PLAN CONTENT	
	Paragraph 10.1.1.4	14. “City’s IDP5” should read “City’s IDP”.
11	ANNUAL REQUIREMENTS	
	Paragraph 11.1	<p>15. Mention is suddenly made of “NPC”. This requires definition.</p> <p>16. In addition, a section is required regarding the process of submission and approval of the application by the City.</p> <p>17. This should require setting out the process and timing of applications being received, considered and approved.</p> <p>18. Appropriate measures for review and appeal of decisions should also be included as well as</p>



SECTION	ISSUE/PARAGRAPH	COMMENT
		any other processes, procedures and protocols relating to approval by the City.

We wish to note that we reserve our rights regarding further contributions, comments and participation in this process for the review of the City of Johannesburg Metropolitan Draft Special Rating Area By-Law & Special Rating Area Policy.

Please contact us should you require any further information or clarification regarding any of the points made in this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andrew CW Barker'.

**ANDREW CW BARKER**

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