

6th June 2017

Ms Leizel Brown

Manager: Public Participation Unit
Environmental Resource Management Department
City of Cape Town
P.O Box 298
Cape Town
8000

By email: leizel.brown@capetown.gov.za

COMMENTS BY SOUTH AFRICAN PROPERTY OWNERS ASSOCIATION (SAPOA) ON THE CITY OF CAPE TOWN OUTDOOR ADVERTISING AND SIGNAGE BY-LAW 2017

1. We refer to the aforesaid that was published for and state that SAPOA represents approximately 1300 companies and organisations (some of which include ABSA, Nedbank, Investec Property Group, Old Mutual Properties, Liberty two ° degrees, Eskom, Transnet, East London IDZ, Growthpoint Properties, the V&A Waterfront Company, ACSA, Eris Property Group, Encha Properties, Zenprop, Redefine Properties, Hyprop and Resilient Properties etc.). Our members own and control about 90% of all commercial, retail, office and industrial properties in South Africa to the value of approximately R500bn and constitute some of the largest ratepayers in South Africa.
2. It has a mandate from its members to comment on, and make representations to government and other stakeholders on all matters that concern its membership.
3. We recognize the need for consumers to be protected as well as the prioritization of transformation. These imperatives are of importance and we are in support of same
4. Against this background SAPOA has dedicated a great deal of time over the last two years, effort and money in providing comments to all By-Laws so that the objectives can be met.

SOUTH AFRICAN PROPERTY OWNERS ASSOCIATION - NPC - REG NO 1966/008959/08

Board of Directors: NNN Radebe (President), P Levett (President Elect), M Deighton (Immediate Past President), N Gopal (Chief Executive Officer), S Moseneke, I Mkhani, D Green, J Aling, J Zidel, V Hako, P Engelbrecht, N Byrd

National Councillors: NNN Radebe (President), N Gopal (Chief Executive Officer), J Aling, M Bakker, N Baumgarten, L Barnard, B Botha, S Moseneke, D Nafte, E Wilson, R Styber, D Green, P Engelbrecht, J Quraishi, W Lord, R Knott, M Parrington, P Altenroxell, E van Niekerk, N Byrd (Elected)

Honorary Life Members: BF Kirchmann, AJ van Riet

Head Office: **Gauteng** - Hunt's End Office Park • Paddock View Building • 36 Wierda Road West • Wierda Valley • Sandton

PO Box 78544 • Sandton • 2146 • Tel: +27 11 883 0679 • Fax: +27 11 883 0684 • Email: reception@sapoa.org.za • Website: www.sapoa.org.za

East London
10 Beacon Park
21 Pell Street
Beacon Bay 5241
Tel: 043 748 1156
Fax: 043 748 1156
sapoa.el@sapoa.org.za

KwaZulu Natal
PO Box 288
Hillcrest 3650
Cell: 082 873 0090
Fax: 086 231 2068
sapoa.kzn@sapoa.org.za

Limpopo
PO Box 751
Bendor 0713
Cell: 072 282 0580
sapoa.limpopo@sapoa.org.za

Mpumalanga
PO Box 14806
West Acres
Mbombela 1211
Cell: 073 363 9694
Fax: 013 741 1305
lowveld@sapoa.org.za

Port Elizabeth
PO Box 63641
Greenacres 6057
Cell: 082 928 5618
sapoa.pe@sapoa.org.za

Western Cape
2nd Floor, The Old Warehouse Bld
Black River Office Park, 2 Fir Street
Observatory, 7925
Tel: 071 740 3732
Fax: 086 602 1095
wc.sapoa@sapoa.org.za

5. SAPOA provided comments on the City Of Cape Town's Draft Outdoor advertising and Signage By-Law on the 15th December 2016.
6. The City then published the City of Cape Town Outdoor Advertising and Signage By-Law 2017. SAPOA again provided comments on 2nd May 2017. We have perused this latest version of the Bill and are extremely disappointed in noting that none of the recommendations made by SAPOA have been taken into consideration.
7. The By-Law remains in its current form. The City continues to put emphasis on finding a balance between the need for economic growth while at the same time ensuring that advertising and signage is not detrimental to Cape Town's unique heritage and tourism treasures, which in our view remains a difficult task which they have not achieved as yet.
8. In trying to find the balance it is important for the City to look at the contribution of the industry holistically with emphasis being made regarding the practical business transactions and or commercial considerations which will ultimately allow the economy to grow.
9. We do not want to believe that our efforts in trying to assist the City are in vain and that the By-Laws are published just as a tick box exercise.

We believe that it is important that we have a meaningful engagement with the City.

Yours sincerely



(Ms) M MOOLA

Legal Consultant