

MOVING FROM A REACTIVE TO PROACTIVE PUBLIC TRANSPORT REGULATORY ENVIRONMENT IN THE CITY OF CAPE TOWN: PHASE 1 - MINIBUS TAXI SPECIAL REGULATORY PROJECT

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ABSTRACT

In the City of Cape Town (the City), a significant increase in the use of minibus taxi services by commuters are experienced. Reasons cited for this are the rise in fuel prices, rapid decline in rail services, increased congestion on the roads and limited subsidised transport services and/or footprint in the City.

The regulation of minibus taxi services in the City occur reactively - where new operating licences are considered *post facto* after the public transport route has already been established and without the route being verified by the City. For this reason, the City made a conscious decision, from a Planning Authority perspective, to start a process to move to a proactive environment - where the City will be in a position to determine the need for any particular public transport service prior to operators starting to operate illegally on routes they deem necessary - from a sustainable minibus taxi supply and demand perspective. To accomplish this, the City first had to get the foundation properly laid for the different building blocks in the process that will ultimately allow the City to achieve this.

The first layer in this foundation is the Minibus Taxi Special Regulatory Project. This project aims to legalise long standing minibus taxi vehicles, consider and verify all proposed new minibus taxi routes, ensure that inactive members and/or operating licences go through the required process to free these up for reallocation and to determine if there is a need for merging taxi associations or register new taxi associations in the City.

1. BACKGROUND

In recent years, it has become apparent through public transport surveys and observations at public transport facilities and train stations in the City, that there is a mode shift with a significant increase in the use of minibus taxi services by commuters.

Reasons cited for this increase, is the continuous rise in fuel prices, the decline in rail services (The rail system in Cape Town requires approximately 90 trainsets and currently there are only 48 trainsets), increased congestion on the roads as a result of an exponential population growth (The City has grown with approximately 320,000 residents the past 3 years or so before the COVID-19 disaster). Currently, limited subsidised transport in the form of the Golden Arrow Bus Service (GABS) and MyCiTi (limited footprint) also contribute to commuters opting for a minibus taxi service. In some instances, subsidised transport fares are considerably higher than that of the minibus taxis

during the peak period. The unscheduled minibus taxis in contrast provide a much more flexible service than the scheduled services on fixed routes and time tables.

Interviews with commuters indicated that safety and security during their public transport journey moreover plays a big role when considering which mode of transport to use. For this reason, a change from rank collection to collection of passengers at their houses as result of safety (incidents of crime when they walk from their houses to public transport facilities) is the order of the day. Public transport users can also these days “book” a trip via Whatsapp with their preferred driver/operator.

It must similarly be noted, that not in all instances, is public transport convenient. Commuters have to walk long distances to public transport facilities - this at times in inclement weather. There are long commuter queues at public transport facilities and in most instances, commuters have to transfer several times which, apart from being inconvenient, is also very costly. There is a desire from commuters to travel direct from point A to Z and not via other points and with point A being the front door of their home and not an overcrowded and/or unsafe public transport facility.

In other instances, industrial and work opportunities shifted from where it was traditionally situated, causing commuters to explore alternative transport options to get to and from work on time every day.

2. PAST SPECIAL REGULATORY PROCESSES IN THE WESTERN CAPE

Special regulatory processes are nothing new and confirm that history continues to repeat itself - something the City wants to stop in its tracks through the proactive to reactive initiative. Below the four key processes in the Western Cape have been elaborated on.

2.1 Special Legalisation Process: 1997 - 1999

On 11 September 1996, the Provincial Cabinet resolved that the contents of a memorandum covering the formalisation and legalisation of the Minibus Taxi Industry (the Industry) in the Western Cape be noted and supported, particularly item 1.1(b), which stated that “*route permits are to be issued in the special legalisation process*”. As mentioned before, this resolution resulted in the amendment of the Road Transportation Act, Act 74 of 1977 (the RTA) allowing the newly established Provincial Taxi Registrar (PTR) to exercise greater control over the Industry.

The Provincial Taxi Working Group (PTWG) and the National Taxi Task Team (NTTT) also highlighted the proliferation in the number of illegal minibus taxi operators (Operators). These Operators were recruited by established minibus taxi groupings to increase their numbers and to protect their turf/routes. A parallel regulatory system was thus created by the Industry, and the joining fees generated by constant recruitment drives were used to allegedly orchestrate illegal activities.

Whilst legal minibus taxi vehicles were checked for roadworthiness and forced to display vehicle markings, illegal minibus taxi vehicles were not subjected to the same stringent process and or requirements. These operators also were not bound by the Standard Constitution and Code of Conduct governing Minibus Taxi Associations (the Associations) and their members. The Special Legalisation Process (SLP) was introduced by the then Land Transport Regulations Board (LTRB) and coincided with the provincial conversion process and aimed to legalise long-serving illegal operators that were on the routes of

registered Associations. These members had to be registered with the PTR before applying for the requisite permits. The Association had to declare that the applicant was a member of the Association and had been operating on the routes specified for the period stated as confirmed at a properly constituted meeting of the Association and a special application form was created for this purpose (Application for permit - Special Legalisation Process).

One of the requirements of this SLP was that the applicant needed to have a minibus taxi vehicle(s) registered in his/her name from at least 1 October 1994. This was verified by the registering authorities. Furthermore, the applicant must have been operating a normal minibus-taxi type service at least since 1 October 1994. A detailed description of the route i.e. between which points conveyance was undertaken and each point where passengers were picked up or set down had to be submitted. A further requirement was that the applicant had to submit proof that he/she applied for a permit before 1 October 1995 (application reference number and date). These new applications were published in the Government Gazette in terms of section 14 of the RTA to allow interested persons to submit comments and representations to the PRE.

With the promulgation of the National Land Transport Transition Act, Act 22 of 2000 (NLTTA), provision was also made for the legalisation of long serving illegal operators. Section 41 of the NLTTA provided that the MEC, in consultation with the Minister, may make regulations providing that the Provincial Operating Licencing Board (POLB) must grant operating licences to public transport operators for minibus-taxi type services whose Associations applied for their registration on or before 30 June 1997; where such operators have not been able to apply for or obtain permits in the past due to reasons beyond their control such as the inability of government to process applications, lack of information and understanding of relevant processes, etc. The Legislation Focus Group (LFG) actively encouraged operators to apply for permits through the NTTT SLP. By 31 October 1997 deadline, 1,700 applications were received.

2.2 Be Legal Campaign: Post 2001

In March 2001 the National Department of Transport launched the “*Be Legal Campaign*”. On 11 January 2002, the Provincial Minister responsible for Transport and Public Works promulgated the Western Cape Regulations on Special Procedures for Legislation. These regulations were made in terms of section 41 of the NLTTA and provided for special procedures to legalise certain operators providing minibus-taxi type services. Regulation 2 compelled the LRTB to grant an operating licence for minibus-taxi type services to a public transport operator who met the below requirements:

- The operator must have been the registered owner of the vehicle mentioned in the application.
- The operator must have been a member of a registered an Association and/or an Association which had an application for registration pending on or before 30 June 1997.
- The operator must have been operating the service before 30 June 1997 and continually thereafter, on the route or routes or at the rank or ranks indicated in the application.
- The operator must not previously have been the holder of a permit authorising a service or services substantially the same as those involved in the application and have sold or otherwise alienated the permit.

All applications had to be submitted on or before 1 February 2002 and operators could not submit more than three applications. The LRTB was required to verify the route or routes in consultation with the municipality as planning authority, the PTR and the relevant Associations had to submit the application to the relevant planning authority with the request to make recommendations. The LRTB was duty-bound to consider such recommendations and many long-serving illegal operators were as a result legalised between 2002 and 2005.

2.3 The Dormant Process: 2007/8 - 2016

The primary role of the City as Planning Authority is to assist the PRE to make informed decisions regarding operating licence applications in terms of accurate supply and demand determination. This allows the PRE, in disposing of applications for operating licences, to achieve a balance between public transport supply and utilisation that is both effective, efficient and sustainable.

In 2007/8 it became evident that the existence of a large number of non-operational (Dormant) operating licences distorted the balance between public transport supply and demand at the time and made it extremely difficult for the City to effectively determine the demand of minibus taxi services within its boundaries. Very few operators at the time informed the PRE that they had left or intend leaving the industry and in so doing request the PRE to cancel the operating licence in the then Land Transport Permit System (LTPS). As a result, these dormant operating licences were still reflected as active in the LTPS.

These dormant operating licences reflected in LTPS resulted in the City refusing to support new operating licence applications on routes where in fact a supply shortage existed. There were essentially two categories of dormant operating licences:

Category 1: Operating licences that have not been utilised since 2001.

Category 2: Operating licences that have been utilised within the last 5 years, but not within the last 180 days as per the legislative requirement. These were considered possible dormant authorities and further investigation entailed minibus taxi route checks to determine if the minibus taxi vehicle was observed on the routes linked to the operating licence followed by an e-Natis check to confirm ownership.

The City has also considered it prudent to meet with the Associations in its area to identify dormant licences. As part of this engagement, the Association was given a list of all permit/operating licence holders on its route with the request to identify dormant authorities. Those listed by the Associations were mainly deceased Operators or Operators who had left the industry because of the conflict and instability or other reasons. Where there was correlation between the dormant operating licence list of the City and that of the Association, the authorities were classified as definite dormant permits/operating licences. Where there was no correlation, the operating licence was left as active.

The City, then allowed for new applications to be lodged in lieu of the said dormant operating licences again with the aim to reduce the number of illegal operators. This was a very long and drawn out process stretching over a period of 8 years and with the City, PRE and PTR affording operators who qualified for operating licences during this process a final opportunity to apply and uplift operating licences subject to the specific conditions in order to conclude the dormant process towards the end of 2016.

3. PROBLEM STATEMENT

All public transport services function within a very strict and rather rigid regulatory environment prescribed by the National Land Transport Act, Act 4 of 2009 (the NLTA) and the National Land Transport Regulations (NLTR) published as part of the NLTA at the time. Planning Authorities i.e. municipalities, thus have the duty to ensure that competition in the provision of public transport services happen within a regulated environment. This prevents destructive competition and in so doing, ensure that each particular mode of public transport is a sustainable one in the context of the planning authority's integrated public transport network.

To achieve the aforesaid, the planning authority, who has the duty in terms of the NLTA to determine the need for any particular public transport service, must have a good grip on all data in relation to all modes of public transport. The PRE, in turn, must have a good grip on operating licence data and route authority information. These three elements (Transport data, operating licence data and route authority information) are key in ensuring that an equilibrium is achieved in terms of public transport service supply and demand. With any of these three elements not accurate, determining the correct supply and demand is not possible.

In relation to the abovementioned, all planning authorities continue to act in a reactive rather than a proactive environment, when considering proposed new public transport service authorities and the number of operating licences required to ensure a sustainable public transport service that benefits the commuter and that is devoid of any destructive competition.

Despite previous efforts to legalise all illegal operators, the Industry continue to recruit new members, operate on proposed new routes illegally, establishes unauthorised public transport facilities for the purpose of setting down and picking up of passengers and holding of minibus taxi vehicles during the off peak period. This scenario is not unique to the City but is evident in all municipalities within South Africa.

4. INTENT

The City, as a planning authority, in 2018 made a conscious decision to move from a reactive public transport regulatory environment - Where new operating licences are considered *post facto* after the public transport route has been established and without the route being verified by the City. This practice prevents considering other public transport services and any destructive competition the proposed new route might cause. In a proactive environment, the City will be in a position to determine the need for any particular public transport service by way of public transport data obtained through regular public transport surveys and proposed residential and commercial developments before any operators start operating illegally on routes they deem necessary.

Due to the City's desire to move from a reactive scenario in terms of public transport provision by minibus taxi operators - and other public transport operators for that matter - to a proactive scenario where operators are invited by the City to apply for operating licences can only be achieved by first rationalising minibus taxi services in terms of operating licences.

Rationalisation in this particular instance does not necessarily mean taking away operating licences, but endeavours to first, right size minibus taxi operations to ensure that supply meets the demand on the respective taxi association routes and second, to rationalise minibus taxi routes (clean up) to ensure that all origin and destinations are adequately covered, that route descriptions read correctly, any duplication is eliminated and that routes are assigned to the correct minibus taxi association authorised by the City to operate on any particular route.

For these reasons, the City, will request that a moratorium on the issuing of any new operating licences on any routes within its boundary that did not form part of the MBT SRP, be imposed for a period of 5 years once the MRP SRP has been concluded. This requirement will exclude new operating licences applied for in lieu of a lapsed operating licence provided that in this instance, an operator must have been operating continuously as per the requirements of the NLTA and as a result be considered as part of the existing supply and demand of minibus taxi services in the City.

The first step in the overarching scheme was to embark on a Minibus Taxi Special Regulatory Project (MBT SRP) as this is the dominant public transport mode within the City carrying the most passengers. The second step in the overall process will be to embark on what is referred to as an authority clean up. This project will entail going through all the route or area authorities registered within the PRE's Operating Licence Administrative system (OLAS) i.e. the Provincial Transport Record System (PTRS). This exercise will determine if the route or area alignment is still relevant, whether the route or area is still actively operated on or within, to correct any incorrect route descriptions and last, to ensure that all operating licence conditions are uniform in terms of any restrictions and/or conditions imposed in terms of specific authorities.

To achieve a proactive environment, it was decided to get the basics right. First, the City must know how many public transport vehicles operate within the system without the authority to do so. Second, the City must establish what all the proposed new public transport routes or areas are public transport operators want to travel along or within. Third, the City must determine if there are any inactive operating licences and or public transport operators in the system. Last, the City must consider if there is a need to amalgamate smaller associations to ensure sustainability or to create new associations.

The intention of this paper is to take the reader through the MBT SRP process, how the different phase relate to one another, challenges experienced and the outcomes achieved as a result of this particular project.

5. MINIBUS TAXI SPECIAL REGULATORY PROJECT

The MBT SRP was initiated to ensure that long standing illegal operators i.e. who operated prior to 31 December 2015 and back (2015, 2014, 2013, 2012 and so on) obtain operating licences. Minibus taxi associations also have the opportunity through this project, to empower drivers that have been in their employ for a considerable period.

The MBT SRP has a **bottom up** and not a **top down** approach. This means that the first to qualify for support for any available operating licences will be operators with no operating licence whatsoever - not operators who already have a number of operating licences and a number of vehicles operating without an operating licence. The intent is to ensure that all those members of minibus taxi associations operating illegally are first seen to and should there be any surplus operating licences available thereafter, (once all the

those with no operating licence have been supported), then operating licences can be allocated to those already in possession of an operating licence. Ultimately, the goal is to balance operating licences numbers in the minibus taxi associations.

Due to the COVID-19 Disaster being declared in March 2020, the MBT SRP could not progress as anticipated and with the COVID-19 Disaster still in place, it is not possible to execute all work necessary to complete the project as planned. Therefore, the project was divided into 4 phases, which deals with the following:

Phase 1.1 Verifying of all information supplied by the minibus taxi associations by the different spheres of government, determining the supply and demand on the registered routes of the respective taxi associations by the City in terms of most recent survey information and then, should it be established that there is a need to increase the number of operating licences on the registered routes, the City will issue a directive to that effect.

Phase 1.2 An overwhelming number of proposed new routes (in most instances routes on which the operators already operate illegally) were submitted by the taxi associations registered within the City boundaries as part of the MBT SRP. For this reason, the proposed new routes will follow the City and PRE agreed route verification and approval process which is a separate process. Should a route or routes be considered favourably by the PRE as a result of this process, then a survey will be conducted by the City to determine the number of vehicles required to meet the demand on the newly registered route(s) and the City will direct accordingly.

Phase 1.3 Notwithstanding the long and drawn out “*Dormant Process*” which, came to an end in 2016, it has become evident during the industry engagements as part of this project, that there are still quite a number of inactive operating licences in the minibus taxi associations. These operating licences needs to be taken through a NLTA Section 78 process in order for the PRE to determine whether the operating licence(s) should be cancelled or not.

Should the PRE determine that the inactive operating licence be cancelled, then, once cancelled in the PRE OLAS, the taxi association must approach the PTR for the deregistration of the member(s) whose operating licences were cancelled by the PRE.

Once the member(s) has been deregistered by the PTR, the City will consider supporting long standing illegal operators, who did not benefit through Phase 1 or Phase 2 above, to become eligible to apply for an operating licence.

Phase 1.4 Consider the possible amalgamation or registration of new minibus taxi associations.

Phases 1.1, 1.2, and 1.3 ran concurrently with government responsible for giving effect to Phases 1.1 and 2.1 and for the minibus taxi associations to initiate Phase 1.3 and seeing it through. Government only becomes a role player at the end of Phase 1.3 should operating licences be freed up to be reassigned as part of this phase. Phase 1.4 will only be initiated after the completion of Phases 1,2 and 3 if a need for new minibus taxi associations is identified.

5.1 Process Flows, Relationships and Project Timeline

With the project phases rationale explained, we need to unpack the specific process flows and different relationships that governed this project as that forms a solid basis for everything to follow. A project plan and specific process flow is key to ensure transparency, objectivity in decision-making and consistency in relation to the project process each role player will form part of - see Figure 2.

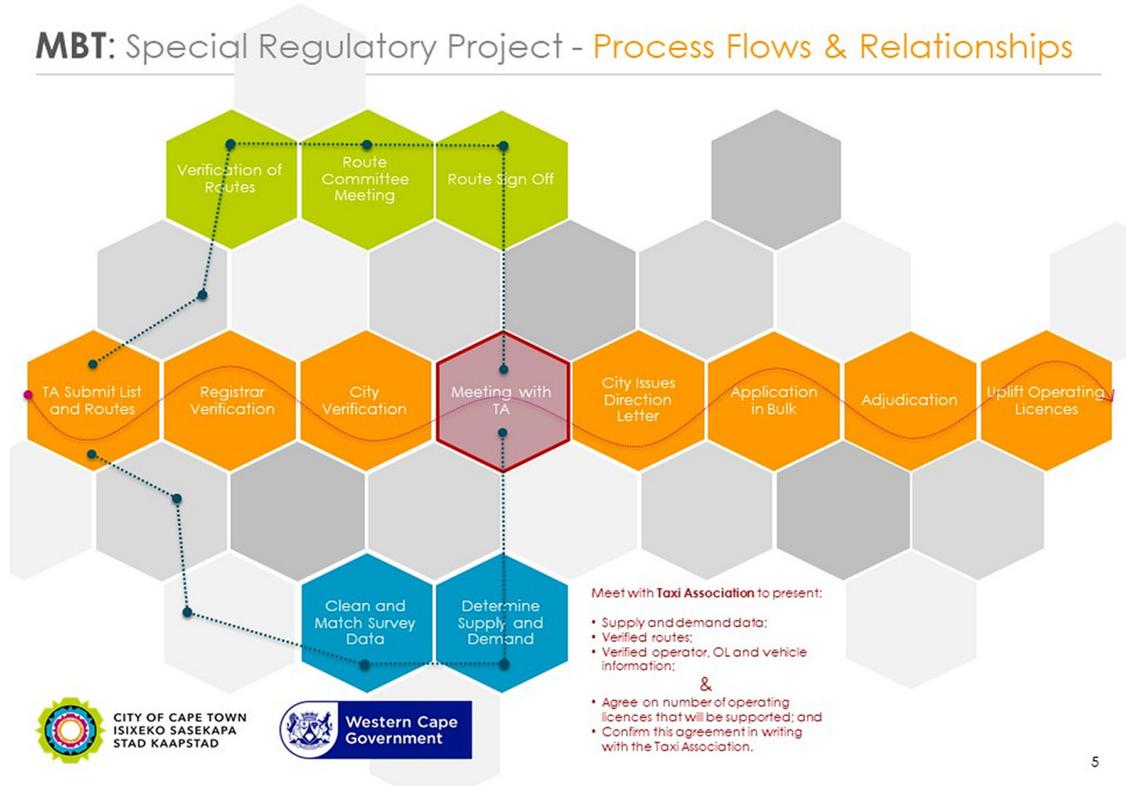


Figure 2: MBT SRP Process Flows and Relationships

The key MBT SRP process steps are illustrated in the line with the orange hexagons. The two other parallel MBT SRP processes i.e. determining supply and demand and route verification, are illustrated in the green and blue hexagons respectively. The most significant action is that of meeting the respective Associations to discuss all the information processed with respect to the Association and is marked as the red hexagon. These three processes and the meeting with the minibus taxi associations will be unpacked further hereunder.

5.2 Project Timeline

Also key to the success of any project is a project timeline which relates back to the project process flows and relationships - see Figure 3. Even though the initial intent was to conclude the MBT SRP during 2020, this was not possible due to the COVID-19 Disaster being declared end of March 2020. Once in a position to do so, the City had to regroup and then adjust work processes which inevitably affected the project time lines.

The significant incidents of minibus taxi violence, killings and suspension of minibus taxi services for a number of days in July 2021, resulted in routes and facilities being closed by the MEC exercising his powers in terms of the NLTA. Besides this, there was an agreement between the spheres of government that specific initiatives relating to specific groupings be suspended until things in the minibus industry normalised again. This to a

lesser extend affected the project time line as the work by government continued, but the outcomes thereof were withheld i.e. meetings were not held and direction letters not issued to the PRE.

MBT: Special Regulatory Project - High Level Project Timeline

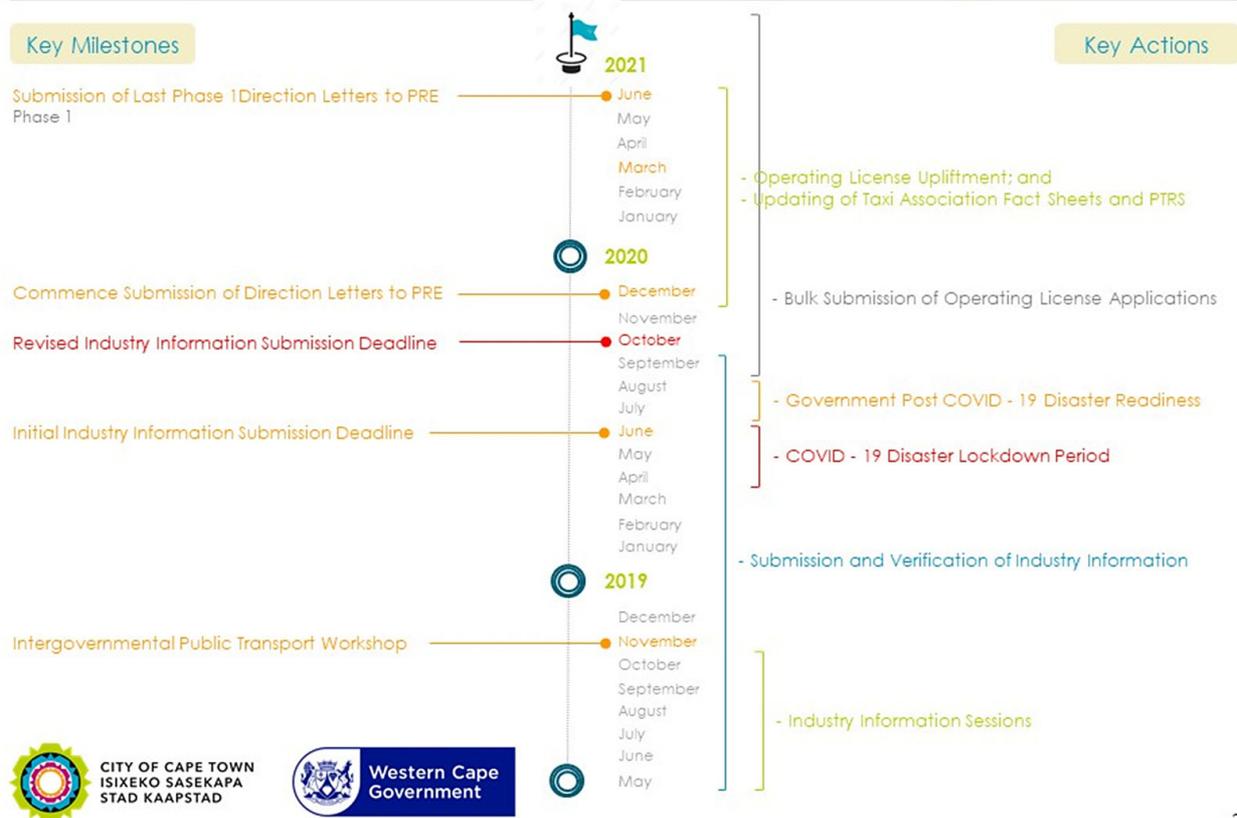


Figure 3: MBT SRP Project Timelines

5.3 Project Initiation

The project commenced briefing the Industry on the intent, requirements and expected outcomes of the MBT SRP. This step was critical to get the buy in from the industry in terms of the process to be followed and criteria that would be applied during the project. The consultation was done on a SANTACO regional basis due to the City having a 110 taxi associations registered within its municipal boundaries - a number too large to get all in one room. The said Associations, in turn falls under the six SANTACO regions with some regions having more taxi associations than others. At the close of the briefing sessions, the Industry was requested to submit their lists of illegal operators and proposed new routes they wish to operate on in future or are operating on already albeit illegally.

Once the minibus taxi associations were all briefed, the project was then presented to the political and administrative heads in the provincial government and the City who the transport responsibility was assigned to.

5.4 Information Verification

With the project initiation accomplished, the first step for the project team was to verify the information received from the minibus taxi associations. The PTR was tasked with

verifying the operator information supplied and the City to verify survey data to determine whether the operators listed complies with the cut off time.

5.5 Determining Supply and Demand

Although the City conduct regular public transport surveys, the said survey information is captured in the City's TSMS but not processed further. Further processing normally occur on an *ad hoc* basis as and when required by a specific department, branch or section in the City.

For the purpose of this project, a dedicated team was established to further process survey data that was only captured and had to commence what is referred to as a cleaning and matching process. During this process, survey data is cleaned from any errors and where origin and destination information is matched with operator, vehicle and operating licence information.

Once the survey data has gone through the clean and match process, it is ready to determine the supply and demand on each of the routes the Association is authorised to operate on. This information is then rolled up to a total of operating licences the Association qualify for - see Table 1.

5.6 Minibus Taxi Industry Engagements

With all the relevant information provided by the Associations being verified and the supply and demand calculated, government was in a position to engage the minibus taxi industry on its findings. With COVID-19 Disaster well entrenched in the form of different alert levels by now, government had to resort to other means to ensure engagements with the minibus taxi industry continue. Unlike government, the minibus taxi industry did not have access to online meeting platforms, and a middle ground had to be found. Engagements were then realised with only 3 key City officials attending a face to face meeting with only three representatives of the taxi association with all COVID-19 protocols observed of course. The rest of the City and Provincial officials joined the engagements online so as to limit the risk of infections.

During the engagement with the Association the executive committee, operating licence and member (legal, illegal and inactive) information was first updated and notes compared in terms of what reflects in PTRS in relation to the minibus taxi association's own membership information. If information did not correspond, the PTR made a membership list available to the association to check and then revert back to the PTR to resolve any discrepancies. The association was then urged to commence the Phase 3 process in order to get inactive operating licences cancelled and inactive members deregistered

If the association was in agreement with the information provided by government, the City would then proceed to the final stage they are responsible for and compile the direction letter to the PRE indicating the number of operating licences the association qualify for all other information relating to the engagement for the purposes of future phases of this project or the overarching reactive to proactive initiative - see Figure 3.

The associations in turn had to schedule a general meeting, present the numbers of operating licences they qualify for to their members and then decide who of the long standing illegal operators will be eligible for an operating licence. The association then have to provide the minutes of the general meeting, the attendance register and a formal

letter on the association's letterhead stipulating the names of those eligible to apply for operating licences. The aforesaid documents were then all incorporated as annexures to the direction letter submitted to the PRE.

5.7 Application, Adjudication and Upliftment of Operating Licences

The City met its own project deadline to issue all the MBT SRP Phase 1 direction letters it had all the information for in December 2021. Some of the associations did not supply the required minutes, attendance registers and formal letters timeously or they required that a survey be done again and that supply and demand be recalculated thereafter. Then only the City will be in a position to issue the required direction in order for the associations to apply for the operating licences due to them.

The associations we further required to apply for all the operating licences they are eligible for in bulk at the PRE. This allows all the applications to be published in one Government Gazette and this allows it to be dealt with in one batch by the City, PTR and PRE when the PRE consider the applications.

Once operating licences are granted, then the operators need to uplift the operating licence i.e. physically linking it to a vehicle within the prescribed time frames of the NLTA.

5.8 Route Verification

The City received in excess of 533 proposed new minibus taxi routes spread across 110 associations as part of the MBT SRP Phase 2. This was a significant number and caught the City, who had to do the initial verification, by surprise. The City again adapted to the challenge and weekly route verification meetings were scheduled in parallel with the other MBT SRP work in order to deal with verifying all the proposed routes before the Phase 2 deadline.

The route verification work was completed end November 2021 and will be submitted in bulk to the PRE to be taken through a process where it will be gazetted in the Government Gazette for comment and input from all interested and affected parties before a final decision by government to grant rights to operate on the proposed routes or not.

6. CONCLUSION

The City is moving towards a proactive regulatory regime at a steady pace. To date, Phase 1.1 realised 1,431 operating licences. Phase 1.2 will unlock exponentially more operating licence opportunities through the approval of new routes. Operating licence opportunities part of Phase 1.3 are limited in extent as it relies on a restricted number of inactive operating licences spread across a vast number of minibus taxi associations to be made available to those already rendering a minibus taxi service albeit illegally.

During past processes to allow illegal operators to obtain an operating licence, government never followed through to ensure they remain ahead of the pack in terms of minibus taxi services supply and demand and as a result approximately 5,000 illegal minibus taxis still roam the streets of the City. In government's defence, adequate legislation did either not exist or was new at the time, the technology was not in place then to properly manage supply and demand from a survey and operating licence data perspective. The MBT SRP project and its processes were well documented and all records kept electronically for future reference.

The MBT SRP process outcomes are now carefully managed via the City's TSMS and the PRE's PTRS and with a moratorium in place, will allow government to execute the next key step in the reactive to proactive initiative to clean up the operating licence authorities in the system. The MBT SRP also put the City in a position to - by way of a master schedule in the process of being completed - encapsulate all industry information, proposed routes and infrastructure requirements to activate these routes.

It must at all times be kept in mind, that the public transport regulatory environment is a fluid one, and even if legislation cannot follow timeously to address new ways of operating and technologies being introduced; the City must stay abreast and update their own statutes and policies regularly to accommodate the ever changing operational requirements of the different public transport services.

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