

DRAFT KNYSNA MUNICIPAL SPATIAL DEVELOPMENT FRAMEWORK 2019
SUMMARY OF PUBLIC AND PUBLIC SECTOR STAKEHOLDER COMMENTS RECEIVED ON THE DRAFT KNYSNA MSDF ADVERTISED FROM: 21 MARCH – 21 MAY 2019

The Draft Knysna Municipal Spatial Development Framework (MSDF) was authorised by Council on 18 March 2019 to be advertised for public comment. Below is a summary of all the comments received as well as the Municipality's responses to these comments.

NO.	SUBMITTED BY	COMMENT	RELEVANT DEPT / TOPIC	RESPONSE
KNYSNA TOWN & SURROUNDS				
1	Knysna Ratepayers Association	Noetzie is a coastal hamlet and it would be better to include it with Buffels Bay and Brenton on Sea. It is suggested that the following decision making tools be concluded. • Draft Western Heads Structure Plan • Eastford/ Welbedacht Structure Plan.	Town Planning Priority Local Area Planning	The proposal to classify Noetzie and Sedgefield differently is supported. The proposal to identify the Western Heads and Welbedacht/ Eastford areas as local area planning priorities is supported and the Implementation Framework in the MSDF has been revised accordingly.
2.	Eastford Downs Private Nature Reserve Home Owners' Association	• EDHOA is therefore heartened to see more emphasis on the safeguarding and rehabilitation of the natural environment in this Spatial Development Framework (SDF) version and fully supports these measures. • EDHOA requests that the public is notified of where the final figures (maps) presented to Council can be viewed. • EDHOA requests clarity on the exact location of the Urban Edge for Knysna, particularly as it relates to Eastford Downs and the Welbedacht/Eastford area. • Therefore, EDHOA again requests that detailed local structure planning is undertaken for Welbedacht and Eastford for better guidance as to what the Local Authority considers to be "appropriate developments" for properties situated in this area.	Town Planning N2 By-Pass Eastford Downs / Welbedacht	The maps presented to Council were made available on the Council website. The final SDF report will contain GIS maps of each area within the municipality showing the urban edge lines clearly. The need for a local area spatial development framework for the Welbedacht / Eastford Downs area is supported. The Implementation Framework in the MSDF has been amended to include this as a priority local area planning action.

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		Given the additional uncertainty over the future of the by-pass project, EDHOA suggests that the final SDF should include comment on the environmental refusal of the Knysna N2 Toll Road (By-Pass) project.		The MSDF supports, in principle, the need for an N2 bypass as a disaster risk mitigation measure and to alleviate pressure on the Knysna town area. The alignment of the N2 bypass must be re-considered in detail in light of the environmental decision taken. It is not within the means for the MSDF project to comment on this decision, nor is it necessary. The MSDF does however note that consideration of a new alignment will need to be taken into consideration in local area planning efforts and in future amendments of the MSDF as more information comes to light.
3	CLC Construction	As a construction company we obviously rely heavily on new work and feel that if any further expansion is limited, it will have many negative effect on all the businesses in our town, who all benefit from construction industry.	Town Planning	The MSDF does not limit new development but reemphasises, as per SPLUMA, that expansion into greenfield areas should not be prioritised over infill opportunities. Expansion should also not compromise the environmental systems that are the very reason for people wanting to live in this area. Submissions made to include certain portions of land within the urban edge in Sedgefield have been favourably considered. In the case of Knysna Town developable land exists within the urban edge and infill and densification is promoted.
4	CM Van Niekerk	I have just moved to Knysna, bought a costly home in Hill Street for the View, and will not appreciate the view disappearing, or my home devaluing because of this. I will simply move back out of this town, and take my business, taxes, and family somewhere. It's a vociferous No from me, and from the 3 other occupants of this property.	Height allowance of 5 storeys in Knysna CBD	The MSDF has been amended to align with the new Municipal Zoning Scheme By-law that allows for ± 4 storeys (12m) for Business Premises zoning in the Knysna CBD. The MSDF includes the identification of the need for a more detailed Densification and Urban

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5	Serett Maree	We would like to raise our concern on the proposal to allow building heights of 5 Storeys. This will change not only the character of the town but will also have serious implications on the views of many residents and properties and reduce the value of the properties affected.	Town Planning Height Restrictions	Design Policy to set out guidelines and parameters and where additional height might be motivated for inclusionary residential use with due respect for the Urban Conservation Area in the CBD and associated guidelines.
6	Elinor Clegg	- I am most distressed that construction of five story building may be allowed. I think this would do a lot of harm to the Knysna CBD. - Part of the charm of Knysna is a sort of village feeling which appeals to tourists. Tourism is a main source of income for Knysna.	Town Planning Height restrictions / tall buildings	
7	Cornelia Meyburgh	- The town depends on tourism for the livelihood of all its citizens and to maintain a tourist friendly town is of the utmost importance for everyone living in the greater Knysna area. - Many Jobs depend on a well-supported tourist industry. - The building regulations should encourage the feeling of small friendly town, visually attractive, with many well maintained "heritage" buildings, incorporating views of the surrounding beautiful nature to give a relaxed and welcoming feeling. Let us support what makes Knysna special and not hide it behind high buildings.	Town Planning / Heritage Conserving heritage character for tourism Height allowance	
8	Inga Chinnery	- I am completely against allowing to raise the maximum of buildings in Knysna to a five-story level. - To allow a second dwelling on a property under strict existing height regulations might be possibility.	Town Planning Height restrictions	
9	Mark Sofianos	Most residents and investors in Knysna have bought into the low impact quaintness of the town which is currently the only appeal we have with the lagoon and outer-lying mountains as an outlook. Without this many property values would decrease further hindering positive growth within the current	Town Planning Height restrictions	

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		framework which is already almost unsustainable. With enough underdeveloped and vacant land already earmarked for development but being held back by council there seems no point in raising the height restriction and further creating access and parking problems which are always a problem to council and the public.	Release of state-owned land for development	
10	CMAI Architects	- Knysna Town- Southern edge of the Proposed Central Park (southern edge of the Northern Areas) – A park can only be as good as how its edges are handled. A (scenic) road along the northern edge of the park would ensure access to and surveillance of the park. It would allow for economic opportunity and infill development along the southern edge of the Northern Areas. The intended purpose of the road should be to act as a catalyst for development and bring tourism to the northern areas. The park road is not to be confused with the Concordia Road Corridor. Proposed NMT routes through Central Park should rather accommodate both vehicles and NMT. The terrain is steep and routes may not be used if vehicles are excluded. Which could result in them being unsafe. - Rheenendal Urban Edge proposed in the document will maintain the status quo. To integrate and economically transform the area the urban edge would need to include the land in the vicinity of Totties General store and Eatery, and the junction with the road to Bibby's Hoek and the GRNP Goudveld entrance. It could potentially also include brownfield development around the sawmill area. These are areas of existing settlement or impacted land. - Uniondale Road (R339) is in poor condition and in need of upgrade.	Town Planning Central Park & Northern Areas Rheenendal Urban Edge Uniondale Road (R339)	This suggestion for the proposed northern edge of the proposed central park is welcomed and will be taken into the work on the Heidevallei detailed precinct plan currently out for public comment. Detailed design work on the proposed Central Park will also be needed in its implementation phase at which point this proposal can also be explored in more detail. The MSDF has been edited to prompt consideration of this. The concern re the safety of the proposed NMT routes through Central Park if they cannot be used by vehicles is a legitimate one. It may be that these routes are vehicular by nature; i.e. they may take the form of funicular or a scheduled public transport service. The MSDF has been edited to prompt careful consideration for safety in how these routes are operationalised. The SDF acknowledges Totties as an existing economic hub. However, Rheenendal's urban edge already includes vacant land portions for additional development that can tie into the existing urban footprint. The town is not prioritised for large scale growth given the limited number of jobs in the area and the cost

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				of servicing this area, so the urban edge will remain as currently delineated. The need for the upgrade of the R339/ Uniondale Road is identified in the MSDF.
11	Marike Vreken on behalf of Trackstar Trading for Erf 5084, Knysna	In light of the above we kindly request you to amend the draft Knysna SDF, to include Knysna Erf 5084 into the urban edge of Knysna, since: • It is well established that this property is suitable for development purposes; • This development has been authorized by the National Department of Environmental Affairs, and • This proposal development will specifically address the middle-income housing need as identified in the draft Knysna SDF.	Town Planning	The accommodation of this site within the urban edge is supported and maps have been updated accordingly.
12	Marike Vreken on behalf of Tresso Trading for Erf 8978, Knysna	• In light of the above we kindly request you to amend the draft Knysna SDF to include the remainder of Knysna Erf 8978 into the urban edge, since it is well established that this property is suitable for development purposes, and since development has been approved on this property in the past.	Town Planning	The accommodation of this site within the urban edge is supported and have been updated accordingly.
13	Pezula Homeowners Association & JP Vorster S.C. Brooklyn Advocates Chambers	The Pezula Private Estate Home Owners' Association ('PPEHOA') considers Blue Crane Way to be a private road on • private property and would insist that it remains so. I accordingly conclude that the Knysna Municipality will not be entitled to assert its right of ownership of the expropriated road and that a Court will recognize the notarial servitudes in favor of the Municipality.	Town Planning/ Transport Planning Pezula Road extension	This matter is being dealt with legally. The Municipality is within its rights to express the desired status of this road in its MSDF as a matter of principle and policy, complying with the principles of the Spatial Planning and Land Use Management Act and supporting the effective functioning of settlement in Knysna for the benefit and safety of all residents and visitors to Knysna.
14	Schalk van der Merwe	• Maximum height of 5 storey buildings in the CBD – Firstly, the exact area of the CBD must be demarcated to eliminate	Town Planning	The MSDF has been amended to align with the new Municipal Zoning Scheme By-law that

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		future conflict between property owners and the Municipality. Secondly, until the demarcation is finalized, I strongly object to this proposal and would like my objection to be recorded.	Height Restrictions	allows for ±4 storeys (15m) for Business Premises zoning in the Knysna CBD. The MSDF now includes a statement on the need for a more detailed Densification Study and Policy to set out guidelines and parameters.
15	Leisure Island Residents Association (LIRA)	- While this magnificent and varied waterfront attracts many Knysna residents, tourists and holidaymakers, LIRA is concerned that it is currently in a poor condition, with old and deteriorating infrastructure, environmental degradation, and inadequate facilities management. LIRA has the resources to make a major contribution to upgrading the waterfront, and would like to propose the establishment of a formal relationship with the Knysna Municipality to progress this matter. - Our submission therefore proposes: That the Knysna Municipality nominate representatives to meet with LIRA to set out the Terms of Reference for the establishment of a formal structure, with the goal of improving the Leisure Island Waterfront.	IDP Knysna Waterfront	The economic and amenity value of Leisure Island to Knysna is supported. The MSDF confirms the requirement for proactive maintenance of the road/ bridge to Leisure Isle and the maintenance of coastal access points which serve as special public coastal access and recreational destinations. The request for an engagement mechanism with the Municipality is supported and this principle has been included in the MSDF. This particular request will be responded to in terms of the Municipality's IDP process and implementation.
16	Gregory Barnes Marika Vreken on behalf of Axon Investments for Erf 4015, Knysna	- Specifically, as it affects me, Erf 4015 is earmarked as CBA and most of the southern parts of the property is now in the "coastal management line" -, and it seems that the new draft SDF does not take the existing rights approval into consideration. - Further, I understand from other concerned ratepayers, that there are areas in Ward 10 that were also previously inside the urban edge and that have a valid Environmental Authorization, that is now exclude from the urban edge. In light of the above we kindly request you to amend the draft Knysna SDF, by:	Town Planning Critical Biodiversity Areas/ Western Cape Spatial Biodiversity Plan Existing Rights vs. Urban Edge / CML	This landowner may act within the property's existing rights approval seeing that more detailed studies have been done to determine the appropriate location of development on this site, provided that all necessary authorisations have been obtained The delineation of the CML in the Knysna area was primarily informed by the extent of the Protected Area (Knysna National Lake Area), Sensitive biodiversity (WCBSP), steep coastal cliffs/primary dunes and the 5m amsl contour.

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		- Earmarking Erf 4014, Knysna as “urban area” in accordance with the planning and environmental approval; - Move the proposed coastal setback line in accordance with the approved development rights on Knysna Erf 4015.		It must be noted that the delineation of CML’s (as per the ICM Act) requires that more than just coastal erosion risk and sea level rise information is considered. The aesthetic values of the coast, aspects consistent with the purpose of the coastal protection zone as well as the protection of coastal public property, private property and public safety must also be considered. The delineation of the CML along the cliffs aims at attaining connectivity of ecological process along the coast, for aesthetic purposes as well as safety considerations. The CML was also delineated in collaboration with municipal officials and other organs of state. The municipality had specific input with respect to the delineation of the CML along the cliffs. An extensive stakeholder consultation process was conducted that included public meetings and the circulation of draft and final reports. The CML will however be subjected to further stakeholder engagement in order to allow the MEC to establish the CML in terms of the ICM Act. The SDF will be amended to expand on the implications of the CML delineations for future development in areas where rights have or have not yet been obtained.

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17	TV3 on behalf of Westriver Development Co (Pty) Ltd	In light of the Development Approvals attached to the Property, and which form part of Westriver's constitutional property rights in terms of Section 25 of the Constitution, as well as the prejudice which Westriver would suffer if the Property were to be excluded from the SDF, it is submitted that the Property be included in the urban edge and therefore the new SDF.	Town Planning Westriver Application	The inclusion of this property within the urban edge is not supported, as it does not align with the principles by which the urban edge has been delineated, such as spatial integration or the prioritisation of incremental, contiguous expansion of the existing footprint of settlements or affordable and sustainable infrastructure provision. The constitutional argument is not supported. The landowner may exercise existing rights attached to the property which has to date been outside of an urban edge. The MSDF does not give or take away rights.
NOETZIE				
18	The Noetzie Conservancy Owners Association (NCOA)	- There is support within the SDF for keeping Noetzie outside the urban edge. - The SDF's view that the road through Pezula Private Estate to the Noetzie road must be opened to the public is supported. - The NCOA would like to have details of the proposed Conservation Estate Expansion plan- e.g. 500m from where to where? – and have the implications of the buffer zone spelled out. - The NCOA supports investigation into the long term planning options for the N2 bypass to secure and alternative entry and exit into Knysna, both to assist disaster management and to relieve traffic congestion in Knysna's CBD. - Due to the importance of keeping wildlife corridors in the Noetzie area it is suggested that further developments should not be allowed to put up high fences.	Town Planning Noetzie Pezula Private Road	Noetzie is outside of the urban edge. This is consistent with the fact that Noetzie is on the seaward side of the Coastal Management Line. The unique development parameters in place for Noetzie will be carried over into the new zoning of Resort I with non-conforming uses in the new Knysna Municipal Zoning Scheme By-law. The necessity for an overlay zone should be further considered to support the location of this area within a marine buffer area; for example to ensure that the sensitive host environment is protected from pollution and allowance for the movement of wildlife across private properties is made. GRNP Marine buffer areas The total length of the marine buffer is 22.96 km. The Knysna Municipal part is 3.56 km. This

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				zone aims to buffer the existing MPA and other areas where no MPA exists to maintain functionality and diversity of coastal and marine ecosystems by minimising impacts on natural processes and appropriately responding to climate change. Pollution from land based sources (agriculture runoff, plastics, sewerage) are current pressures whilst increased interest in offshore oil and gas exploration raises the threat of potential new sources of pollution. The Marine buffer area can cover activities below the high water mark (marine) as well as the shoreline immediately above the high water mark (coastal). Equitable access to and sustainable benefit sharing from coastal and marine ecosystem services are supported. Development guidelines: Support only climate resilient development. Engage with stakeholders to prevent pollution of coastal and marine resources. Allow marine resource use within constraints of relevant legislation. A map has been added to the MSDF document to provide greater clarity.
19	Laetitia Nienaber-Oosthuizen	I note with interest Noetzie, being a Hamlet, and that under the private residential heading that “No new residential development permitted, unless it is linked to value chain related economy”. What does this mean? Please advise when the Overlay Zones will be considered to set additional parameters for development and land use ‘in particularly sensitive and unique environments such as Noetzie’. The expired town planning scheme attempted to write us out of our park on our properties	Town Planning Noetzie development / Overlay Zones	The MSDF has been revised to provide greater clarity on planning concerns in Noetzie. Noetzie is on the seaward side of the Coastal Management Line, it is on the edge of a buffer area to the Marine Protected Area and it is next to the Noetzie Estuary – a priority water resource unit where the National Department of Water and Sanitation identified the need for strong land use management and enforcement. For these reasons there must be severe

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				limitations on any new development within the Noetzie footprint limited to existing development rights and additional existing development parameters which the MSDF recommends should be carried into the Municipal Zoning Scheme By-Law. The MSDF has been amended to be clearer on permitted land uses and limitations.
SEDGEFIELD				
20	VPM Planning on behalf of Voigro Investments 24 CC for Erf 95 of the Farm Ruygte Valley 205	The purpose of this objection is to propose that the amendment to the Urban Edge around Sedgefield, especially along the boundary of Portion 95/205 be re-considered for the following reasons: • Portion 96/205 is at present the only property available for natural urban extension to the east. • The site has been earmarked for urban extension for the last 20 years. • The land was acquired and the preparation of development applications is underway on the basis that the property previously had development rights which lapsed, it was within the urban edge as per the 2017 SDF and consistent with prior spatial plans since 2000 – a change to this urban edge is considered to be against the principle of consistency and predictability. This portion of land presents the only sizable vacant land parcel that can be developed in a cost effective way to address the need for affordable middle class and safe residential homes without impacting on the natural area. It is the intention of the developer to construct houses on sizable plots within the R2m bracket which is only possible with the economy of scale offered by the site and its proximity to	Town Planning Development of Portion 95/205 Sedgefield	The accommodation of this site within the urban edge is supported and maps have been updated accordingly. The efficient use of land to respond to existing demand in an integrated way should be a key concern for Sedgefield, and it is therefore recommended that the development of this site targets the appropriate income groups to support social and spatial integration. The R2million bracket is not considered to be affordable for the middle class. A motivation for the development of the site on the basis that it will provide affordable housing opportunities should not be made disingenuously. This area is designated as a site where inclusionary housing should be required in terms of the Municipality's land use scheme to ensure affordability for employed households such as teachers, police men and women, etc.

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		existing infrastructure – for which there is demand and little supply. The site is surrounded by urban development and should be considered a natural urban extension or infill opportunity as opposed to urban sprawl.		
21	Sedgefield Ratepayers and Residents Association	- Portion 95 of the farm Ruygte Valley Nr 205 Sedgefield - We are satisfied that the proposed development addresses these concerns and would be of future benefit to the village. In this regard our Association fully endorses and supports the objection to the placing of the development property outside revised Urban Edge as now indicated in the Draft Spatial Development Framework document. - We therefore request that the property remains within the Urban Edge and that your office will favorably consider the approval of the development application.	Town Planning Ruygte Valley Development	The accommodation of this site within the urban edge is supported and maps have been updated accordingly. The efficient use of land to respond to existing demand in an integrated way should be a key concern for Sedgefield, and it is therefore recommended that the development of this site targets the appropriate income groups to support social and spatial integration. This area is designated as a site where inclusionary housing should be required in terms of the Municipality's land use scheme to ensure affordability for employed households such as teachers, police men and women, etc..
22	Groenvallei II Homeowners Association	- The SDF recommends that new development should be directed to vacant, underutilized or recycled land and within the urban edge, a principle that is supported in theory. The reality in Sedgefield is that there is no substantial development land available within the proposed edge. - By studying the maps of Sedgefield, the only sizable vacant land parcel that could be developed in a cost-effective way	Town Planning Ruygte Valley Development	The accommodation of this site within the urban edge is supported and maps have been updated accordingly. The efficient use of land to respond to existing demand in an integrated way should be a key concern for Sedgefield, and it is therefore recommended that the development of this site targets the appropriate income groups to support social and spatial integration. This area is designated as a site

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		without impacting on any of the natural resources of the area is Portion 95/205.		where inclusionary housing should be required in terms of the Municipality's land use scheme to ensure affordability for employed households such as teachers, police men and women, etc..
23	Estate Agent: Angela Page	- As a homeowner, I am concerned that with no more land to develop, you are placing the burden on the existing owners' rates & taxes solely on our shoulders for the maintenance of existing infrastructure and development thereof. - With shortage of supply, the demand for new housing increases and there is not many vacant stands on the market, a handful in Coal, Myoli and Groenvallei. With no further development means the redundancy of the building industry and the loss of business and eventually jobs and the increase in unemployment.	Town Planning	The MSDF does not limit new development but reemphasises, as per SPLUMA, that expansion into greenfield areas that are not suitable for development should not be prioritised over infill opportunities. The urban edge in Sedgefield has been amended to provide for additional development where appropriate and extensive developable and redevelopable land exists within the Knysna town urban edge. Densification is also promoted.
24	Sedgefield Shell Garage	Business owners as well as residents of Sedgefield this concerns us due to the following points: - Some development is much needed to stimulate the fragile economy of Sedgefield. - The rate of unemployment is very high in Sedgefield, further development will help alleviate this. - Sedgefield is experiencing a high crime rate and jobs created by development will help alleviate this. - The burden on the ratepayers is set to increase if we pretend the broadening of the tax base. - Sedgefield is currently experiencing a shortage of affordable housing and any curbing future development will drive property prices up.	Town Planning Growth of Sedgefield	The concerns are appreciated. The urban edge has been amended to include Ptn 95 of farm Ruygte Valley Nr 2015 for inclusive development. Unfortunately Sedgefield's outward growth is severely constrained by surrounding environmental systems that give the quality to Sedgefield that attracts people to it, so this is a delicate balance. This is further exacerbated by the nature of the infrastructure servicing development in Sedgefield and the risk it presents to the environmental systems. Careful consideration of these issues on a holistic basis to support growth and sustainability at the same time is why a more detailed study and planning exercise for Sedgefield is recommended by the MSDF. Re-development of existing properties within the

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				urban edge in Sedgefield is supported in the MSDF.
25	DELPLAN on behalf of Autumn Storm Investments (PTY) LTD the registered owners of Ruygte Valley 205/82 & Erf 1638, Sedgefield.	- According to the Sedgefield Environmental Systems Maps as well as the CBA maps (fig.3), these two erven has been identified as highly sensitive conservation areas. Why have been included in the urban edge while an area that has previously been identified as an area suitable for urban growth, with no identified sensitive environmental features, has not been concluded? - We are respectfully requesting that consideration be given to the long history of the application and that you include this section that has previously being identified as "Future growth direction" into the urban edge. It could still be earmarked as a transitional area to fit in with the overall urban structure of the town.	Town Planning Ruygte Valley and Erf 1638 Development application in Sedgefield	Development outside of the urban edge in sensitive ridgeline and topographical areas is not supported. This development could have significant impacts on the characteristics and scenic value of Sedgefield.
WESTERN HEAD				
26	Marike Vreken on behalf of Landowners of the Western Head, Knysna	Who determined the coastal setback line, and based on what scientific evidence? Special studies that were conducted on various properties along the Knysna Estuary concluded that a safe setback line for sea level rise would be between 2,85m MSL and 3,2m MSL. Why the generic 5m contour line? This generic "no development line" of the 5m contour, sterilises development potential on properties, preventing land owners to exercise their primary land use rights.	Town Planning/ Environmental Planning Coastal Management Line	According to the Eden Coastal Management Lines project, inundation in estuaries represents the primary risk and floodline determination that can anticipate flood events with different return periods is key to understanding how flood dynamics will impact on existing and future development. Unfortunately, to generate the necessary information within the scope of a regional Coastal Management Line (CML) demarcation project is prohibitively expensive. Consequently, an approach was adopted that uses a simple contour height line as approximation of the functional estuarine zone to inform management lines for estuaries. This was be supplemented by good quality local

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				ecological sensitivity information or indications of recurring inundation gleaned from an assessment of the vegetation surrounding estuaries. In all cases though, future refinement of the CML must defer to fine-scale management plans or floodline determinations where such have or will be prepared. An Estuarine Management Plan has been completed for Knysna estuary. The local fine-scale planning initiative offered further guidance on existing and planned land use and was be taken into consideration when determining the management lines. However, in the absence of an estuary specific floodline delineation (as is the case for the Knysna estuary), it was recommended that the 5m or 10m above mean sea level (amsl) contour be used as a reference line to determine or inform development management lines. The Western Cape estuaries where the floodline determination has been completed, significant correlation is evident between the 1:100yr floodline and the 5m amsl. It should also be noted that for this project, lidar survey data is used to determine the 5m amsl and 10m amsl contour lines, increasing the accuracy of the 5m amsl location. It is correct to state that SANParks have supported that the ground floor level must be

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				a minimum of 3 m above mean sea level and garages and services spaces must be at least 2.25 m above mean sea level to prevent flooding, based on engineering studies in high hazard areas. In another case SANParks supported that the ground level is raised to 2.85m amsl and the floor levels be set at 3.2m amsl based on engineering studies. SANParks respect existing development rights. We support that development in the estuarine functional zone should be discouraged where possible in order to reduce risks. The SDF has been amended to expand on the implications of the CML delineations for future development in areas where rights have or have not yet been obtained.
27	Marike Vreken on behalf of Landowners of the Western Head, Knysna Logan- Martin Inc Ronnie Webster	- We as land owners do not support the Knysna SDF in its current form, as the spatial proposals for the Western Heads area are so restrictive, it hampers land owners to even exercise their current primary land use rights. - We would like to see: Focused consultation with the land owners, to develop a conservation vision, with development incentives, to achieve conservation outcomes, but also economic development goals and financial viability. If these proposals are not financially viable for land owners, there will be no resources to achieve the desired conversation outcomes, and the environment will even be more compromised. - We recommend that the more detailed precinct plan for the Western Heads be developed (such as the former Western	Town Planning/ Environmental Planning Western Heads Critical Biodiversity Areas/ Western Cape Spatial Biodiversity Plan	The National Environmental Management, Biodiversity Act 10 of 2004 identified a number of Critically Endangered (CE) ecosystems and one of the most endangered is the vegetation type FFd10, Knysna Sand Fynbos. This vegetation type hosts threatened plant species and five threatened butterfly taxa (Mecenero <i>et al.</i> 2013), including CE taxa <i>Orachrysops niobe</i> (Brenton Blue) and <i>Thestor brachycerus</i>. According to CapeNature data (2017), the remaining natural extent of the Knysna. Sand Fynbos footprint is 1 478 ha. The coastal corridor from the Western Heads to Goukamma is the last intact stretch of Knysna

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		Heads Spatial Plan), that can address sustainable development opportunities for the geographic area.		Sand Fynbos and the conservation of this corridor is of national importance. Formal conservation will contribute to achieving national biodiversity targets in critically endangered ecosystems. SANParks identified the Knysna Sand Fynbos corridor as a priority protected area expansion area. The proposal for a more detailed local plan that supports sustainable development opportunities within this local area is supported. The Implementation Framework in the MSDF has been amended to include the identification of the Western Heads as a priority area for a Local Area Sustainable Development Plan or similar policy that will develop a conservation vision, with development incentives, to achieve conservation outcomes, but also economic development goals and financial viability in consultation with land owners and other stakeholders. The Western Cape Biodiversity Spatial Plan and its critical biodiversity areas do not give or take away existing development rights or authorisations. However, where the exercising of these rights trigger other legislative requirements such as an EIA the WCBSP will be a critical informant as the best available

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				science to be validated via ground-truthing. The WCBSP Map is intended to flag whether proposed land use changes are desirable or not, where authorisation is required. The SDF has been amended to expand on the implications of the CBA delineations for future development in areas where rights have or have not yet been obtained.
28	Brenton Ratepayers Association	The Western Heads is an extremely sensitive biodiversity area in our town and is home to critically endangered fynbos and wildlife. It is essential that Knysna Municipality's Environmental Department works hand in hand with Brenton Ratepayers Association, the Western Heads Goukamma Conservancy and other wildlife and environmental groups to ensure the protection and sustainability of the critically endangered species on the Western Heads. Responsible, sustainable alien clearance is one of the areas that B.R.A is happy to work with Knysna Municipality.	IDP/ Environmental Planning Western Heads	Noted. Thank you. This has been referred to the relevant Department of the Municipality. It is not an MSDF matter per se.
PUBLIC SECTOR COMMENTS				
29	Department of Rural Development & Land Reform	A comprehensive MSDF is considered to include all components into a single MSDF and not two separate documents. Maybe the Knysna Municipality could consider the packing of these two reports as Volume 1: Status Quo and Volume 2: Spatial Proposals and Implementation Framework of a single MSDF and consider the re-numbering of the Chapters in Volume 2 to continue after Chapter 4: Status Quo Synthesis. The Executive Summary of the full SDF should be added before Chapter 1 in the Status Quo Report.	Formatting	Noted. An executive summary will be prepared on adoption of the final MSDF report. The MSDF report incorporates key findings from the status quo report which itself is annexed to the MSDF. The MSDF clearly states that status quo report should be read together with the MSDF report. The entire status quo report is not included upfront in the MSDF in order to make the MSDF briefer and more digestible.

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30	Western Cape Government DEA&DP: Yanga Xashimba (Spatial Planning Region 3)	- The proposed priority housing development area to the east of Concordia and Khayaletu South is questionable from a spatial justice and spatial sustainability perspective as defined in SPLUMA (situated outside the three identified restructuring zones for Knysna). - Karatara & Rheenendal - these settlements both have uncertain economic futures, and it would indeed be problematic to locate more low income / subsidy housing in these settlements without the commensurate economic growth opportunities that create employment opportunities. Having recognised this, the SDF could perhaps word this approach a bit more firmly. - It would be useful for Map 11 (CIF) to illustrate degree of priority or phasing. For example, the proposed new development area to the far east of the town of Knysna may be shown as lowest priority or development area of last resort – only once the other Priority Housing Project Areas and Infill areas are taken up for residential expansion.	Town Planning Housing project east of Concordia	These comments informed amendments to the draft MSDF prior to its submission to Council for authorisation to proceed to the public participation phase.
31	Heritage Western Cape	- The draft MSDF does not comply with s.30 of the NHRA and therefore cannot be supported - A partial heritage inventory for Knysna has previously been assessed and deemed inadequate - A complete and thorough heritage inventory that complies with Heritage Western Cape requirements is needed - Such inventory should inform the MSDF	Heritage	The legislation is misunderstood. The Western Cape Department of Environmental Affairs and Development Planning advises as follows: <i>Section 30(5) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), states that whenever a planning authority compiles or revises their planning scheme or a spatial development plan, the planning authority shall <u>compile an inventory of all the heritage resources which falls within its area</u> of jurisdiction and submit such inventory to the relevant provincial heritage</i>

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				authority (which in this case is Heritage Western Cape). It is noted and accepted that this is indeed a requirement of NHRA, however neither SPLUMA, LUPA nor the MSA explicitly have heritage requirements of Spatial Development Frameworks. A careful reading of section 30 of the NHRA can be interpreted as meaning that the heritage inventory should be compiled while the MSDF or zoning scheme is compiled and in fact this section doesn't explicitly state it should form a part of the SDF itself. Given the above, it is our interpretation that whilst the municipality may not be in compliance with section 30(5) of the NHRA, this does not imply that the MSDF is not in compliance with the relevant planning legislation in terms of which it is approved. The Council can therefore, once it complies with the procedural and content requirements of SPLUMA, LUPA, the MSA and its planning bylaw, approve the MSDF as a core component of its Integrated Development Plan in terms of the relevant planning legislation. Therefore, regardless of the status of the heritage inventory and the compliance with the abovementioned heritage requirements as set out in the NHRA, it is indeed possible that the Knysna Municipality can approve a planning legislation compliant Municipal Spatial Development Framework.

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				It is also noted that the Municipality actively engaged with members of the heritage practitioner community to gather information to enable the MSDF to reflect the heritage assets in the Knysna Municipal Area. This is presented in the Status Quo Report, to the extent that the information can meaningfully be reflected at a town and municipal scale. The MSDF at a policy level emphasises the important of the municipality's heritage assets and resources and the need to protect and respect these. There is legislation in place to ensure that this policy intent is carried through in implementation actions. There is no need for the MSDF to repeat these. Unfortunately the comment does not specifically point to where the MSDF might compromise the heritage assets of the municipality or important municipal or town wide heritage resources that should be recognised. . The outstanding heritage resource inventory is identified as a priority implementation action and can then inform or lead to a subsequent amendment to the MSDF or when it is compiled again at a later stage.
32	Western Cape Department of Health	Concern is raised with regard to densification proposals related to the burden of disease specifically in respect of Tuberculosis (TB) which is significantly attributable to environmental factors.	Human Settlements & Town Planning	These concerns are noted and welcome. The design guidelines apply at a level of detail outside of the scope of the MSDF however the MSDF has cross-referenced this issue. Densification promoted by the MSDF is

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		Guidelines are provided to built environment practitioners to create housing that reduces the transmission of TB.	Better design to reduce disease transmission	intended as formal densification meeting the necessary building standards.
33	Western Cape Government DEA&DP: Pollution and Chemicals Management (Wilna Kloppers)	The PCM is concerned about the current pollution risk from (i) the Knysna WWTW and (ii) the uncontrolled and under-serviced residential development in the Bongani, Bigai and South catchments as well as (iii) the discharge of (polluted) storm water into the Knysna Estuary.	IDP	IDP Department to take note of this for inclusion in the IDP comments to be addressed by the environmental, solid waste, sewer and storm water departments. The MSDF identifies risks associated with not maintaining and upgrading existing infrastructure on ecosystem services in particular and identifies this as of critical importance.
34	Western Cape Government DEA&DP (Waste Management)	- The document needs to include a description of the existing and proposed new waste management infrastructure. - The MSDF needs to show alignment with the WCIWMP as well as Municipal IWMP, currently being reviewed. for completion around August 2019. - Population growth projections and human settlement plans have major implications for the provision of integrated waste management services as well as the availability of landfill airspace and as such should be considered in the alignment between the MSDF and waste sector plans. - The MSDF needs to take into account the recommendations outlined in the Assessment of the Municipal Integrated Waste Management Infrastructure: Eden District Report developed by DEA&DP to include the rehabilitation of the Brenton-on-sea landfill, Knysna Garden Waste (Old place) and Sedgefield landfill (R 14 964 800); the operational compliance cost (R 1 788 100) for Brenton-on-sea landfill, Knysna Garden Waste (Old place) and Knysna RTS; Cost of Integrated Infrastructure for Knysna Municipality to achieve 20% waste diversion (R 27 107 000) with the development of	IDP Solid Waste Management	The Status Quo report discussed existing and proposed solid waste infrastructure. Waste infrastructure requirements have been included in the MSDFs Capital Expenditure Framework and noted in the Implementation Framework. IDP Department to take note of the infrastructure and associated budgeting requirements and to ensure that this is adequately dealt with in the IDP and budget.

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		a composting and crushing facility in Knysna and chipping facility in Brenton-on-sea. The municipality needs to provide a budget allocation for integrated waste management, as there is a lack of waste management facilities.		
35	Western Cape Government Department of Education	- Timing of any new housing developments is critical in order for sector departments to respond timeously in providing the necessary service to these newly developed/expanded communities. - Furthermore, the WCED herewith requests that all residential-led development proposals including applications for the rezoning of properties zoned for community facilities be circulated to both the WC Department of Transport and Public Works (Directorate: Immovable Asset Management) as well as the WCED. - The department is committed to the following projects mainly in the Knysna Central are where the current pressures is the highest: new primary school in Knysna; new primary school in Nekkies, new primary school in Concordia, rehabilitation of Knysna High School. However, the acquisition of a school site for the Concordia Primary School has presented significant challenges. The department hereby requests support from the municipality to access site timeously for purposes of construction and delivery of education investment. - Throughout the review, reference is given to some geographical areas. It will be valuable to supplement the narrative with a map for navigation purposes. This includes projects listed which can be spatialized (e.g. Housing, Infrastructure networks etc.)	IDP Alignment of service delivery Town Planning Identification of site for school in Concordia	Noted. There are many variables at play determining the timing of implementation of human settlements development projects. The Knysna MSDF has proposed that this is clearly indicated in the Municipality's Human Settlements Plan which has been identified as a priority sector plan to be updated. The Knysna MSDF also notes the importance of this plan being prepared in consultation with and communicated to affected service delivery departments within and outside of the Municipality. Refer to section 4.1.2.2 The identification of a primary school site has been resolved. A map providing a guide to navigating local areas has been included. The Housing Project Pipeline has been spatialized in the Policy Context, Vision Directives and Status Quo Report annexed to the MSDF report. Activity corridors are identified on Map 13, The Knysna Restructuring Zona as a priority investment area for inclusive development is identified on Map 14.

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		- There is difficulty in understanding where the pressure areas are located from a service delivery perspective and also understanding where the municipality's investment corridors/areas are. Which areas are to be intensified and with what land use? - Due to a general challenge around land availability, a map indicating vacant municipal land will be valuable in achieving common goals across the various sectors. Inaccessibility of land is a common challenge for many sector departments contributing towards the urban form. A prerequisite for development is also infrastructure capacity across the various utilities – Which areas are constrained and which areas have spare capacity? - How does Knysna's public transport system inform this review? Limited information on this sector.		Urban growth areas are identified on Map 17 Priority investment areas are identified on Maps 19 and 20 Generally mixed uses are supported however the existing industrial area should be protected for industrial uses. The value of information on vacant state owned land is important. Vacant municipal land is not necessarily available – a vacant and under-utilised land audit is needed that studies all sites in detail considering their availability, suitability and competing demands for this land. Such an audit that deals with all state land and private land is identified as a priority implementation action. Infrastructure capacities are dealt with in the Status Quo Report annexed to the MSDF (Annexure 1) and discussed in summary in section 2.3 of the MSDF. The transport systems in Knysna are set out in the Status Quo Report. There is no state provided public transport, only privately provided public transport services. This is discussed in the Status Quo report and the MSDF makes proposals for a public transport service linking the Northern Areas to the Knysna Town area more directly, as well as seasonal services that could deal with the pressure placed on Knysna's road networks

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				over the holiday seasons. The MSDF also guides considerations for a Local Integrated Transport Plan to be done by the Municipality.

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