Knysna Municipality 2017
(Synopsis of the 2008 and 2016 SDF Review Proposals)
Prepared by:

GAPP Architects, Urban Designers and Spatial Planners, Cape Town

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List of Acronyms:

CBA – Critical Biodiversity Area
CBD – Central Business District
DEA&DP - Department of Environmental Affairs and Development Planning (WCG)
DRDLR - Department of Rural Development and Land Reform
DM - District Municipality
ECD – Early Childhood Development
FET – Further Education and Training
FLISP – Financed Linked Individual Subsidy Programme
GDP - Gross Domestic Product
GPS - Growth Potential Study
HSP – Human Settlement Plan
IDP - Integrated Development Plan
ISC – Intergovernmental Steering Committee
ISDF - Integrated Strategic Development Framework
KMA – Knysna Municipal Area
KM – Knysna Municipality
LUPA - Land Use Planning Act
MSDF - Municipal Spatial Development Framework
MTREF – Medium Term Revenue and Expenditure Framework
NDP - National Development Plan
NDPG – Neighbourhood Partnership Development Grant
NEMA - National Environmental Management Act
NHRA - National Heritage Resources Act
NMT - Non-Motorised Transport
NPC – National Planning Commission
PSDF – Western Cape Provincial Spatial Development Framework
SDF - Spatial Development Framework
SPLUMA - Spatial Planning and Land Use Management Act
SQ - Status Quo
WC - Western Cape
WCG - Western Cape Government
WWTW – Waste Water Treatment Works
1 Background & Purpose

1.1 Purpose of the Report
The purpose of this report is to provide an accessible, synthesis of the Knysna Spatial Development Framework (SDF). This report follows on the 2008 SDF and the draft Integrated Strategic Development Framework (ISDF) published in 2016 and sets out the main spatial development intentions of the Municipality and addresses the following:

1. Alignment of the draft SDF revision prepared as part of the ISDF process with SPLUMA, LUPA and the IDP vision and strategies.
2. Consideration and incorporation of relevant inputs and comments from stakeholders engaged at stakeholder workshops in May 2017 as well as comments received in response to the advertising of the draft ISDF.

1.2 Process and Timeframes

1.2.1 Review Process
The draft ISDF was informed by a number of sector plans such as a Strategic Environmental Assessment, Human Settlement Plan and Economic Development Strategy. The SDF component of the ISDF, informed by these studies, presented a revision of the 2008 SDF. The ISDF process was initially guided by an intergovernmental steering committee and included a comprehensive public consultation programme. In 2016 the draft SDF was published for comment and this document represents a synthesis of this draft, adjusted as indicated in 2.1 for approval by the Knysna Municipal Council.

1.2.2 Public engagement
Following on the publication of the draft ISDF in 2016 a number of written comments were received. A further opportunity for public input into the review of the 2008 SDF was afforded at the end of May 2017 through workshops with stakeholders. These workshops were specifically intended to provide input into the finalisation of the current SDF review process.

A schedule of the stakeholder comments and inputs received during these workshops and written comments on the ISDF and how they were either incorporated into this SDF revision or how and where they will be addressed in the future is included in Annexure A.

1.3 Document Structure
The report is set out in line with the Department of Rural Development and Land Reform Guidelines for Spatial Development Frameworks.

2 Policy Context and Vision Directives

2.1 Implications of Relevant National Policies

2.1.1 National Development Plan 2030
The National Development Plan 2030 (NDP), developed by the National Planning Commission (NPC) in the office of the President, and approved by Cabinet in 2012, sets out an integrated strategy for accelerating growth, eliminating poverty and reducing inequality by 2030. In particular the NDP aims to:

- reduce the proportion of households with a monthly income of below R419 (US$42.2) a person (in 2009 prices) from 39 % to 0 %, and
- decrease the Gini coefficient, which measures inequality, from 0.69 to 0.6, by 2030.

The following aspects of the NDP fall within the competencies of local government and should thus inform the SDF for Knysna:

- The transformation of human settlements and the national space economy as set out in Chapter 8. Targets include more people living closer to their places of work; better quality public transport; and more jobs in proximity to townships. Actions to be taken include desisting from further housing development in marginal places, increasing urban densities and improving the location of housing, improving public transport, incentivising economic opportunities in highly populated townships and engaging the private sector in the gap housing market.
- Building an inclusive rural economy (Chapter 6) by inter alia improving infrastructure and service delivery, and investing in social services and tourism.
- Investment in economic infrastructure (Chapter 3) including the roll out of fibre-optic networks in municipalities.
- Improving education and training, through inter alia a focus on expanding early childhood development (ECD) and further education and training (FET) facilities.
- Chapter 12 focuses on building of safer communities and although explicitly noted in the NDP, actions should include improving safety through sound urban design and investment in the public realm.
- Building environmental sustainability and resilience as set out in Chapter 5 with a strong focus on protecting the natural environment and enhancing resilience of people and the environment to climate change. Actions include an equitable transition to a low-carbon economy (which would inter alia imply making settlements more efficient) and regulating land use to ensure conservation and restoration of protected areas.

2.1.2 Spatial Planning and Land Use Management Act, 2013

SPLUMA (Act 16 of 2013) provides detailed guidance on the content and process of preparing an SDF. In summary an SDF should include the following:

- A 5-year spatial plan for the municipality
- A 10-20 year spatial vision for the pattern of growth and development of the municipality
- The structuring and restructuring elements of the spatial framework (e.g. development corridors)
- An understanding of expected growth, housing demand, economic outlook and job creation and where this will be accommodated
- The implications for infrastructure provision over the 5-year period
- Environmental pressures and opportunities, including critical and vulnerable resources, agricultural land and coastal access
- Identification of areas where detailed local plans are needed
- Implications of the SDF for land use management
• An implementation plan which should include all details of actions required to realise the SDF

Of particular importance is that the SDF should be premised on the principles of spatial justice, spatial sustainability, efficiency, spatial resilience and good administration.

2.2 IMPLICATIONS OF RELEVANT PROVINCIAL POLICIES

2.2.1 Western Cape Provincial Spatial Development Framework (2014)

The Western Cape Provincial Spatial Development Framework, (PSDF), gives spatial expression to the national and provincial development agendas; serves as basis for coordinating, integrating and aligning ‘on the ground’ delivery of national and provincial departmental programmes; supports municipalities to fulfil their municipal planning mandate in line with the national and provincial agendas.

It communicates government’s spatial development intentions to the private sector and civil society. Alignment of the KSDF with this plan is thus not only a legal requirement; it is also a strategic imperative to ensure that the KMA optimises provincial support for its development agenda.

The PSDF is driven by three major themes, namely growing the economy, using infrastructure investment to effect change, and ensuring the sustainable use of the provincial resource base. The policies and strategies that flow from these themes focus on strategic investment in the space economy, settlement restructuring and the protecting the natural and cultural resource base.

These PSDF policy statements have application in the Knysna Municipality:

• Protect biodiversity and ecosystem services
• Safeguard inland and coastal water resources, and manage the sustainable use of water
• Safeguard agricultural and manage its sustainable use
• Recycle and recover waste, deliver clean energy resources, shift from private to public transport, adapt to and mitigate against climate change
• Safeguard cultural and scenic assets
• Diversify and strengthen the rural economy
• Revitalise and strengthen urban space-economies as the engine of growth
• Protect, manage and enhance sense of place, cultural and scenic landscapes
• Improve inter and intra-regional accessibility
• Promote compact, mixed use and integrated settlements
• Balance and coordinate the delivery of facilities and social services
• Promote sustainable, integrated and inclusive housing in formal and informal markets.

2.2.2 Land Use Planning Act, 2014

LUPA (Act 3 of 2014) has translated SPLUMA objectives and provides a framework act and directives for all aspects land use management and planning in the Western Cape. It provides additional guidance on the preparation of SDFs. Section 10 states that a municipal SDF should:

• Comply with other applicable legislation (e.g. SPLUMA)
• Promote predictability in the utilisation of land
• Address development priorities
• Where relevant, provide for specific spatial focus areas, including towns, other nodes, sensitive areas, or areas experiencing specific development pressure
• Consist of a report and maps covering the whole municipal area, reflecting municipal planning and the following structuring elements:
  – Open space systems and ecological corridors.
  – Proposed major projects of organs of state with substantial spatial implications
  – Outer limits to lateral expansion
  – Densification of urban areas
• Be aligned with provincial spatial plans and strategies and indicate structuring elements such as provincial road networks and cultural and ecological resources of provincial importance.

2.3 DISTRICT PLANNING INFORMANTS

2.3.1 Eden District SDF

The Eden District Municipal SDF is in the process of being compiled and a spatial concept for the District has been developed and approved with the 2017 Eden IDP Review.

The EDM’s overarching Vision and Mission, has been aligned in the SDF and IDP. The SDF is spatialising the Eden vision and strategies within a sustainable, long-term growth path as required by SPLUMA. The EDM has given the SDF Review clear direction to:

1. Address financial, social, environmental and institutional sustainability to set the foundation for a vibrant, sustainable region
2. Actively promote spatial integration, inclusion and redress
3. Enable appropriate land use planning oversight
4. Optimisation of Eden District assets

The alignment of the Eden District Vision and Mission are illustrated in Figure 2.

The Spatial Concept adopted along with the Eden SDF, is framed around four overarching, integrative and connected strategic drivers relevant to the Eden context. These are fundamental to achieving coordinated (spatial) planning for the sustainable growth and resilience of the Eden District. These drivers direct the approach Eden District’s SDF Review. There are three strategic spatial drivers:

1. A sustainable environment is an economy positioned for growth – The Economy is the Environment
2. Regional Accessibility for Inclusive and Equitable Growth
3. Coordinated Growth Management is Key to Financial Sustainability

These are underpinned by a fourth driver; effective, transversal institutional integration – we need to plan, budget and manage as one government. This speaks to the institutional context within which spatial planning must take effect, with particular reference to
municipal finance, coordinated infrastructure planning and delivery as well as robust project preparation and pipelines.

A diagrammatic illustration of these spatial drivers of change are indicated in the Spatial Concept Diagram adjacent. The key concepts put forward are outlined below:

1. The Economy is the Environment
The Eden SDF should recognise the unique attributes, resources and risks of the Klein Karoo and Garden Route, namely:
- Natural and Agricultural Resource Base;
- Economic Role and Potential; and
- Celebrate the diverse landscape, lifestyle and tourism offerings.

2. Regional Accessibility for Equitable and Inclusive Growth
Enable appropriate accessibility to and between the Klein Karoo and Garden Route as well as the greater Eden District:
- Establish a clear primary and secondary regional route hierarchy, role and investment priorities (N2 vs R62);
- Address connectivity between the coastal belt and inland areas; and
- Enable virtual and physical accessibility.

3. Coordinated Growth Management For Financial And Social Sustainability
Define a clear settlement hierarchy and framework for accommodating growth in relation to infrastructure, economic and institutional capacity. Direct and encourage growth to match capacity, resources and opportunity:
- Align need with capacity, jobs, social services and opportunity
- Recognise population dynamics in infrastructure investment (more diverse housing products and opportunities in the correct location)
- Optimise the potential of a reconceptualised accessibility network to improve livelihoods and sustainable service delivery

Figure 3: Alignment of Eden Vision and Mission with SDF Strategies

Figure 4: Eden SDF Spatial Drivers of Change
Figure 5: Eden SDF Draft Spatial Concept
2.4 ADJACENT MUNICIPALITIES

2.4.1 George SDF (2013)
The KMA is bordered by the George MA to its west and north. The major settlements in the GM are located to the west of Knysna, along the N2, which crosses into the KMA at the edge of the Swartvlei. The 2013 SDF has been reapproved with the 2017 IDP but the review of this SDF has just commenced. The 2013 SDF recognises the role of the town of George as major driver in the regional economy with the potential for diversification to attract further investment in the secondary and tertiary sectors (such as science, technology and training related exercises).

The northern-eastern portion of the municipality, bordering the KMA to the north is a largely rural area, with wilderness areas, plantations and farming. The SDF promotes the protection and enhancement of the rural character and natural resource base, through inter alia managing subdivisions and strategic investment in basic and social services for rural communities.

2.4.2 Bitou SDF (2013)
The Bitou Municipality located to the east of the KMA adopted its SDF in 2013. Plettenberg Bay located on the N2 to the east of Knysna is the major urban centre of this municipality and like Knysna the main economic driver of this town is likely to remain leisure and tourism.

The SDF concept is framed by a bio-regional planning approach, which recognises the importance of the river basins as a basis for analysing and protecting the natural resource base. Hence the management of the Keurbooms and Piesangs Rivers basins, which have their source in the KMA, are central strategies for achieving sustainability, and of relevance to the KSDF.

The Bitou SDF also recognises the importance of tourism as the driver of the Bitou economy and thus protection and enhancement of the natural resources and scenery is promoted. The R340 which connects to the N2 and crosses into the KMA to connect to the Prince Alfred’s Pass is identified as a scenic route.
3 Overview of the Knysna Municipality

3.1 Characteristics

3.1.1 Spatial Characteristics

The Knysna Municipality is one of seven municipalities that form the Eden District. It is located on the South Coast at the heart of the Garden Route, and bounded by Bitou Municipality (Plettenberg Bay) to its east and George Municipality to its north and west. It includes the towns of Knysna, Sedgefield, Karatara, Rheenendal, Buffalo Bay, Brenton-on-Sea and the smaller hamlets of Charlesford, Bibby’s Hoek; Barrington; Kraaibos and Elandskraal, Noetzie, Buffelsnek, Springveld, Middelerf, Gouna and Homtini. In 2015 the population came to just more than 73,000 people or 24,000 households (KM IDP, 2016-2017).

The Knysna Municipal Area (KMA) is endowed with a spectacular natural setting. The Outeniqua Mountains and Garden Route National Park form the backdrop to an undulating forested landscape, drained by a number of rivers with large water bodies in the low lying areas and sandy beaches sheltered by rocky headlands and coastal dunes.

The lakes, estuaries and wetlands of the KMA are regarded as particularly important elements of the natural resource base offering a variety of ecological services. The geology of the area supports two distinct biomes, namely Afrotemperate Forest and Fynbos, which include endangered endemic vegetation types such as Knysna Sand Fynbos.

3.1.2 Key Socio-Economic Informants

This section presents the key socio-economic informants that will contribute towards understanding the spatial development needs in the Knysna Municipality.

The draft Human Settlement Plan (2016) prepared as part of the draft ISDF, projected the population growth for settlements in the KMA to grow by 1.2% per annum, with the bulk of growth as expected in the town of Knysna. Although the source of the information is not specified it seems to correspond with figures used by the WCG’s Treasury Department. Based on a household size of 3.1 persons (a calculation based on 2011 Census information), this would imply that between 2011 and 2030 an additional 5,675 units will be needed just to accommodate the population growth. It is evident that these figures are fairly crude and do not for instance differentiate between income groups, types of housing required and the extent to which government assistance will be needed to meet the demand. An earlier study by Urban Econ (2013) has indicated that the bulk of the demand will be in lower income brackets requiring a full subsidy or partial subsidy such as offered by the FLISP or Social Housing programmes. This situation is unlikely to have changed.

The housing backlog, i.e. people currently living in inadequate housing is more difficult to pin down. The draft HSP provides the following figures: Households in informal structures (including backyard dwellers), based on 2014 and 2015 figures comes to 5,251 whereas the Provincial housing demand database reflected a figure of 9,748 in 2015. There is no indication that these discrepancies have been resolved to date, but it would safe to say that there is significant demand for subsidised housing in the KMA, particularly in the Knysna Northern Areas, Hornlee and Sedgefield. Since 2015 the Municipality have been able to provide 1,191 serviced plots in the Knysna Northern Areas, with plans for the provision of top structures in the pipeline. The 2016/2017 MTREF allocated R57M of its capital expenditure to housing programmes, but this allocation has dropped to R19M in the draft 2017/2018 budget, in favour of spending the bulk of the budget on water infrastructure. This trend to focus on the provision of basic services as opposed to actual housing provision is likely to continue for the foreseeable future.

With regard to the demand for employment opportunities, the Knysna Municipality displays a trend towards jobless growth and what jobs are required are in the highly skilled and skilled categories. In 2011 unemployment in Knysna was measured at 24.8% and youth unemployment 32.3%. These figures are likely to have worsened in the light of job shedding in the agriculture, forestry, fishing, manufacturing, and construction sectors reported for the period 2005-2013. According to the draft ISDF, the areas experiencing the highest unemployment are: Knysna Northern Areas, Hornlee, Rheenendal and Smutsville and Sizamile in Sedgefield.

1 WCG, 2015:24
Figure 8: Knysna Municipality Regional Connections
3.2 MUNICIPAL POLICY & VISIONS

3.2.1 Municipal Vision Statement
The Knysna Municipality has developed a new vision for its municipal area; “inclusive, innovative, inspired”.

Building on this vision, the Municipality’s mission includes “conserving our natural resources through updating our IDP, SDF, zoning schemes, service master plans and other related activities” and “planning for the growth and development of quality municipal services to support our community”. – A mission that recognises the importance of the natural resource base as underpinning the quality of life of its people.

3.2.2 Integrated Development Plan
The 2016-2017 Knysna IDP puts forward 7 strategic objectives which will guide the efforts and expenditure of the Municipality of the next five years:

- To ensure the provision of bulk infrastructure and basic service through the upgrading and replacement of ageing infrastructure, and the expansion of new infrastructure
- To promote a safe and healthy environment through the protection of our natural resources
- To create an enabling environment for social development and economic growth
- To grow the revenue base of the municipality
- To structure and manage the municipal administration to ensure efficient service delivery
- To encourage the involvement of communities in the matters of local government, through the promotion of open channels of communication

3.2.3 Infrastructure Investment
The medium term revenue and expenditure framework for the 2016/2017 financial year had a total capital expenditure budget of R174.4 million, of which the bulk was to be spent on housing programmes (R57.4 million or 33%) and the remainder as follows: R22.6 million for upgrading the pumping scheme at the Charlesford Dam, R10 million for multi-purpose centres (from the NPDG), R8.3 million for the Knysna WWTW Screw press; R2.5 million for a new cemetery in Knysna and R4.6 million for the upgrade of Gray Street in Knysna.

The draft 2017/2018 MTREF indicates a significantly reduced capital expenditure budget of only R 123.1 million with a shift towards spending on infrastructure:

- Water Infrastructure R 27.7 Million (to address water scarcity)
- Electricity: R 23.8 Million
- Sanitation: R 10.6 Million
- Refuse Removal: R 1.2 Million
- Roads Infrastructure: R 9.7 Million

![Figure 9: Knysna Municipal Finances (Source: https://municipalmoney.gov.za/ accessed 03-06-17)](https://municipalmoney.gov.za/)
Population

68 659

People

about 10 percent of the figure in Eden: 574 266
less than 10 percent of the figure in Western Cape: 5 822 734

Employment

47.8%

Employed

a little higher than the rate in Eden: 45.95%
a little less than the rate in Western Cape: 50.06%

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4 Spatial Drivers of Change

4.1 THE APPROACH TO THE STATUS QUO

The strategic priorities for the SDF are framed in terms of inherited spatial legacies that need to be redressed, current issues that need to be addressed and future risks that need to be mitigated.

For purposes of intergovernmental alignment and coherence the three spatial drivers of change identified in the Eden SDF have been adopted and adapted to summarise the specifics of the Knysna Municipal context.

4.2 ECONOMY & THE ENVIRONMENT

The economy of the Knysna Municipal area is highly dependent on its underlying natural resource base. Knysna, situated at the heart of the Garden Route, is known for its scenic landscapes including indigenous forests and plantations, biodiversity, attractive water bodies and coastline, and mild climate which attract visitors throughout the year.

Tourism has taken over from the primary and secondary sectors as the key economic sector in relation to GDP growth.

Commercial services\(^2\) which include services offered to visitors, are by far the largest contributor to the economy in terms of GDP (55%) as well as biggest employer in the local economy offering 49% of all jobs. The services sector is also the only sector that has created jobs in the recent past, whereas the primary and secondary sectors have shed jobs (WCG, 2015).

Notwithstanding these shifts, the agricultural and forestry sector has shown above average growth (compared to the Eden District) since 2005 albeit jobless growth with a relatively small contribution to the Knysna GDP (WCG, 2015).

The importance of the natural resource base in supporting livelihoods and its potential to improve the quality of life of all Knysna residents cannot be underestimated and thus the protection and enhancement of the environment should be the main driver of any spatial planning and spending for the municipality.

In this regard it is noted that the municipal spending on repairs and maintenance of infrastructure is at present below the desired 8% of its total budget\(^3\) which not only poses a risk to the environment but could be indication that inefficient urban growth is in fact not viable.

Legacy Issues

- Inappropriate development on the banks of watercourses, causing downstream silting and degradation of the water quality of important water bodies, with resultant cost to economy (e.g. decline in oyster production) and municipality (e.g. cost of dredging).
- Alien vegetation invasion which impacts on run-off, indigenous vegetation, coastal dune systems and exacerbates fire risk.

Current Issues

- Pollution of water courses and wetlands through illegal dumping, and overextension of sewerage treatment capacity.
- Urban expansion, including informal settlements, existing land use rights and recent approvals that impacts on sensitive natural systems, and the unique scenic qualities and character of the area.

Future risks

- Climate change which is likely to result in sea level rise and increased vulnerability to coastal storms\(^4\) – Fluctuating rainfall patterns as a result of climate change which will impact on water infrastructure and water supply.
- Water scarcity (already an issue in certain settlements) and loss of eco-system services as a result of an expanding development footprint.
- High dependency tourism makes the economy especially vulnerable to global economic trends as well the ability of authorities to manage the resources which attracts visitors.

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\(^2\) Commercial services include wholesale & retail trade, catering & accommodation, transport, storage & communication and finance, insurance, real estate & business services sectors.

\(^3\) https://municipalmoney.gov.za/profiles/municipality-WC048-knysna/ (accessed 30-05-17)

\(^4\) Areas at particular risk include Leisure Isle, Buffalo Bay, Costa Sarda, Thesen Island, Knysna Quays, Laguna Grove, Sedgefield Island and Sedgefield in the vicinity of the lagoon.
Figure 11: Knysna Environmental Risks

Figure 12: Knysna Critical Biodiversity Areas

Figure 13: Knysna Loss of Ecosystems - Sprawling vs. Compact Growth
4.3 ACCESSIBILITY

Access refers to the ability of people to access economic opportunities and social services and recreational amenities. Thus access has to do with the functionality of the road network to connect communities, the availability and viability of transport services. This is a function of the distribution of community facilities and economic opportunities in the municipal area. International best practice and the SPLUMA and PSDF underscore that this is not only a matter of mobility for cars but must consider the walkability and liveability of towns and the land use mix and densities that make it possible to improve the efficient and just access of all communities to the economy, services and amenities of the KMA.

The PSDF Municipal Services Financial Model (MSFM) case studies demonstrated that current spatial patterns will impact severely on households, requiring low income households to pay up to 18% more for transport than they already do. Households are already paying close to 40% of their incomes on transport in the Western Cape, leaving little to no money for education, training, housing and food. This pattern is making the poor, poorer and stifling the growth of the economy.

The transport network in Knysna is dominated by the N2, which connects the town to the major consumer markets of Cape Town, Port Elizabeth and beyond. A route for the N2 bypass has been designated by SANRAL to divert through traffic around Sedgefield and Knysna. However, given government funding constraints, EIA process requirements and land acquisition challenges it unlikely that this will materialise within the time horizon of this SDF. The Eden District SDF is promoting the upgrade of the R62 as an alternative for freight and tourism traffic to ease congestion on the N2 during peak periods.

The scenic Main Road 355 connects the smaller settlements of Karatara and Rheenendal with Knysna and Sedgefield. The R339, with the spectacular Prince Alfred pass, connects Knysna to Uniondale, which is functionally dependent on Knysna for higher order services.

The railway line to George and Cape Town is not operational at present. Minibus taxis provide the only form of public transport and serve the towns of Knysna, Rheenendal and Sedgefield – there is no service to Karatara.

With regard to community facilities and economic opportunities, previous planning documents have indicated that there are a lack of facilities such as schools and opportunities in the smaller settlements of Karatara, Rheenendal and the northern parts of Knysna.

Knysna Municipality is in the process of rolling out broadband across the municipality as a catalyst to attract investment but at present only 36.2% of all households in the KMA have access to the internet. Broadband access could provide for opportunities solving the lack of education facilities through distance learning programmes.

**Legacy**
- Legacy of inequitable apartheid norms and standards for provision of community facilities, such as schools.
- Relatively walkable existing settlements
- Peripheral, mono-functional townships with poor access to economic opportunities and amenities
- Remote rural settlements with very low levels of access to economic, social and recreational amenities

**Current**
- The barrier effect of N2 which limits access to socio-economic opportunities to certain groups.
- Poor condition of important connectors such as R355 and R339, which disadvantages communities dependent on access to services via these routes.
- High dependency on N2 to move goods and people to and from the municipal area.
- Lack of population thresholds to support community facilities and public transport in remote settlements.
- Severe congestion in Knysna and Sedgefield during peak holiday season.
- Lack of tertiary education opportunities in the municipal area.
- Land use distribution not optimal to support efficient transportation, e.g. the location of Knysna industrial area.

**Future Risks**
- Demand for education and other community facilities far exceeds ability of authorities to provide through traditional mechanisms and within forecast budgets (Eden SDF SQ 2017)
- Low density growth and further fragmentation of land use, will impact on walkability of settlements and thresholds to support affordable public transport.

In South Africa, the financial resources are not available to continue with business as usual and a spatially efficient future for KM will depend on doing things differently.

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5 https://wazimap.co.za/profiles/municipality-WC048-knysna/ (accessed 30-05-17)
"Carrying fewer people in more vehicles will consume more urban space, compared to carrying more people in fewer vehicles. This mismatch between demand for road space and its supply will manifest as either traffic congestion or a need to widen roads, removing scarce urban land from other uses", [which is an unsustainable prospect for a resource constrained world].

www.humantransit.org; 5/05/17
4.4 GROWTH MANAGEMENT

The third leg of a holistic approach to a prosperous and sustainable municipality, is the management of growth that will protect the physical resource base, create opportunities for residents to prosper in a just space economy and ensure the efficient use of resources to protect long term financial sustainability of local government.

This requires inter alia the careful consideration of the current role of settlements and their potential for growth. Within the municipality, Knysna is the main economic driver, but in the context of the Garden Route and sub-region, Mosselbay and George are likely to remain the most important economic hubs.

Knysna’s role as the major visitor destination on the Garden Route is likely to remain its economic driving force, but to keep this competitive edge it is imperative that the tourism offering remains authentic, that the sense of place, and the experience of a real village is retained.

The expansion of upmarket holiday and retirement accommodation not only creates problems during peak season but results in an empty town during low season. This skewed growth is reflected in the GINI coefficient for Knysna – which was measured at 0.57 in 2014 and although somewhat better than the figure for the Western Cape, is still high by international standards.

This inequality is spatially reflected in for instance the density of development which in Knysna is extremely low in the more upmarket areas to the south of the N2 and quite high in the poorer areas of Knysna North and Hornlee. It is also reflected in socio-economic statistics such as the unemployment figures cited in the IDP which is as high as 45% in one of the rural wards, around the 30% mark for wards which include informal settlements, but below 15% in the traditional white areas of Knysna (Wards 9 and 10) (KM IDP, 2016-2017).

Growth and densification in Sedgefield is constrained by service provision and it could be argued that its strong beach town character is an asset that needs to be protected.

The smaller settlements of Karatara and Rheenendal, as well as hamlets such as Bibby’s Hoek, Springfield, Gouna and Homtini have their origins in forestry or small scale farming but are in decline and in need of strategic intervention.

The legacy issues to be redressed, current issues to be addressed and future risks that need to be mitigated to ensure that the management of growth is just, economically vibrant, ecologically sustainable and financially viable follow below.

**Legacy**

- Inefficient low density and fragmented residential development in large parts of Knysna.
- Legacy of segregation placing poorer communities on the outskirts of settlements with difficult access to socio-economic opportunities.
- Large tracts of estate development with inefficient use of resources and transformation of land.
- Remote location of rural settlements (originally forestry driven) limits provision of services and development of economic opportunities.
- Ongoing amendments to the urban edge to accommodate development that is unsustainable in terms of infrastructure capacity and services as well as household affordability.

**Current**

- Decline in the CBD of Knysna, as a result of economic downturn and competition from new upmarket development such as the Knysna Waterfront.
- High levels of unemployment in Knysna North, Hornlee, Sedgefield and Rheenendal in particular.
- Attractiveness of KMA and its settlements eroded by sprawling development and resultant loss of authentic small town experience.
- Large, unmet demand for ‘gap’ housing.
- Urban development on steep slopes with environmental impacts and high infrastructure cost.
- Large housing backlog (25% of all housing is informal structures)\(^6\) and demand for housing in areas with limited socio-economic opportunities such as Karatara and Knysna north.
- High expectations of rural communities for municipality to create jobs.
- Growth in demand for skilled labour, but shedding of semi-skilled and unskilled jobs.\(^7\)
- Seasonal influx to holiday towns with implications for sustainable and efficient provision of utility services.

**Future Risks**

- Long term affordability of current and future infrastructure within a context of declining government funding.
- Affordability of housing to attract the middle class and “key workers”, e.g. teachers, nurses and policemen and thus establish complete communities and authentic working towns.

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\(^6\) WCG, 2015: 19.  
\(^7\) WCG, 2015: 24-25
Figure 15: Knysna Growth Management and Investment Trends
4.5 Spatial Status Quo Synthesis

In summary, the Knysna Municipal Area is on the brink of several alarming and unsustainable changes. These include changes in character, the balance between development and environment, municipal financial viability and socio-economic dynamics. According to the Western Cape Growth Potential Study (2014) Knysna town has the greatest growth potential but at the same time sits within fragile ecosystems and has infrastructure capacity constraints (especially water supply and pollution).

“Sprawling low-density settlements are undermining the sustainability of the district, undermining equitable provision of public services, threatening public health and safety, eroding the natural environment and increasing socio-economic fragmentation. Dominant models of infrastructure provision, coupled with public and private housing development patterns are driving sprawling, low density, and peripheral developments in the Eden District. This pattern in turn creates demand for new schools, public facilities, roads and services, putting pressure on already overburdened infrastructure maintenance funds of both local and provincial government” (Eden 2017 SDF Status Quo).

The ecological, infrastructure and social service systems in the wider Eden District are under pressure and cannot sustain projected population growth and enable corresponding economic growth while using current models of governance, conventional technologies and practices. This compels the Eden District and its associated municipalities to work as one and share resources to ensure these systems are supported to work at their best.

The municipality, along with the Eden District, Western Cape and South Africa is facing unprecedented challenges without a stable foundation to meet and address these constructively.

- **Spatial legacy** issues such as socio-economic and spatial fragmentation have not yet been adequately addressed.
- **Current challenges** threaten to overwhelm the core character and value of the area and both state finance and the environment do not have the resources to accommodate “business as usual” development.
- **Future risks** of climate change, food security, socio-economic exclusion and fiscal breakdown without the ecological, financial, economic and social resilience to deal with these.

“We need to face up to the systemic problem that cities take resources from nature, but, at present, give little back to assure the health of ecosystems on which the long-term viability of cities ultimately depends”.

Giradet, 2017, Academy of Urbanism
Figure 16: Growth Potential of Towns Study (2014)

Figure 17: Knysna Status Quo Synthesis
5 Spatial Proposals

5.1 Spatial Vision and Strategies

In response to the challenges outlined above, three spatial strategies underpin the Knysna SDF.

5.1.1 Spatial Vision

Establish Knysna as an authentic place that works for its residents and continues to attract visitors.

Treat the challenges of the Knysna Municipal Area holistically and work towards achieving balance and completeness so that:

1. legacies are redressed in the manner in which growth is managed,
2. current challenges are confronted and dealt with in a just and sustainable manner
3. future risks are mitigated to improve the prospects of a socially, economically and environmentally sustainable future

The overriding intention is to build the Knysna municipal area as a “complete”, just and inclusive ecosystem, society and economy where all can participate without undermining the resources needed to sustain future generations.

5.1.2 Spatial Strategies

The three spatial strategies, aligned with and localising the Eden SDF spatial strategies to the Knysna LM context are:

1. The environment *IS* the economy, recognising Knysna as the heart of the Garden Route and that the environment and landscape underpin this and must be protected to secure the economic future of the municipality.
2. Equitable and inclusive access for spatial justice (improving access to opportunities, services and amenities) improving economic and social inclusion.
3. Sustainable and smart growth management and optimising resources (and operating within ecological, infrastructure and fiscal limits), i.e. doing more with less.

The overarching logic is to establish a clear role and hierarchy of settlements and connections between them to achieve equitable access for balanced and spatially just settlements.

The concept diagrams illustrate the proposed role and growth strategy for this hierarchy of settlements.

Knysna is identified as the main service and economic centre, where inclusive opportunities for growth and transformation are prioritised.

Central to this idea is a system of consolidation nodes, linking communities of the north to retail, social, economic and industrial opportunities to the south.
Figure 18: Knysna Spatial Vision and Concept
5.1.3 OVERALL SPATIAL CONCEPT

Three key spatial strategies are underpinned by an overarching aim to re-establish balance within the Knysna Municipal Area. This balance speaks to many dimensions of the spatial organisation and future of the KMA, including balance:

- Balance between development and the environment to ensure that growth is spatially just, financially viable and environmentally responsible by working towards compact, vibrant, liveable and efficient settlements.
- Balance between settlements in relation to the allocation of and access to resources, recognising and consolidating their varied economic and social roles.
- Balance within settlements in terms of built versus natural areas, land use mix and range of housing and economic areas to create complete neighbourhoods, towns and villages.
- Balance between the nature and location of growth and the impacts on environmental, financial and infrastructure capacity and resources.
- Balance between supply and demand so that the fiscal sustainability of the municipality and its residents is assured.
- Balance in the use of transport modes and
- Regeneration of streets and public spaces to create “complete streets”

The elements of this spatial concept are illustrated in the Vision and Concept Diagram overleaf and then expanded in terms of the three spatial strategies that follow.
Figure 19: Knysna Green Network Concept

Figure 20: Knysna Equitable Access Concept

Figure 21: Sustainable and Equitable Growth Concept
5.2 SPATIAL STRATEGIES

5.2.1 The Environment IS the Economy

The environmental resource base of the KMA as its most important economic asset. The spatial management of growth and development should protect, change and include the following so that this asset can be enhanced to the benefit of all communities.

Protect

To sustain the environmental assets of the Knysna Municipal Area the continuity of biodiversity networks, systems and features needs to be protected through a clear, well managed and accessible municipal green network.

This green network should:
- tie in with regional and national biodiversity corridors
- link rivers, wetlands, CBAs and other remaining green areas
- be edged by appropriate buffer uses
- provide economic opportunities associated with tourism, responsible harvesting and recreation,

This network should protect:
- irreplaceable indigenous forests and endangered fynbos types from overexploitation and development
- coastal dunes as part of a larger ecological system
- water bodies from pollution and inappropriate development.

Change

In parallel the unique character and qualities of the KMA should be enhanced by recognising and ensuring statutory protection of:
- Scenic landscapes, visual landmarks and scenic routes from obtrusive and unattractive development (e.g. security fences and impacts on ridgelines)
- The small town, coastal and forest characters of all of Knysna settlements

To ensure that the economic, social assets of the environment are optimised, the following changes will be required:
- Rehabilitate green corridors, especially degraded rivers to improve their amenity and ecological function
- Manage the interface between existing urban development and green corridors to improve ecological function, amenity and safety.

New

In recognising the economic, social and financial value of the environment as the key underpinning of the local economy, opportunities to introduce new elements of the municipal green network should include:
- Shifting mind sets to recognise green spaces such as indigenous forests as economic and social assets that can play a role in socio-economic integration
- Demarcate new areas for rehabilitation and productive agricultural and ecological functions that complete and extend the green network of the KMA

Regenerative development is about a proactive relationship between humanity and the world’s ecosystems, and about nurturing nature’s dynamism and abundance whilst drawing on its income.

Cities (and towns) need to help regenerate soils, forests and watercourses that they depend on, rather than just accepting that they are ‘sustained’ in a degraded condition.

Giradet, 2017, Academy of Urbanism
Figure 22: Knysna the Economy is the Environment
5.2.2 Equitable and Inclusive Access for Spatial Justice

In the absence of barriers to walking, the density of population will determine the number of people within a fixed, short walking distance of any point. That in turn determines the potential market size for fixed transit and thresholds of economic activity, which will govern the viability of public transit. (acknowledgement to www.humantransit.org)

The proposal is to clarify the role and hierarchy of municipal linkages to establish a safe, and resilient access system offering affordable and accessible integrated transport that connects communities within the larger settlements of Knysna as well as improving linkages between towns, villages and hamlets.

Within Knysna a cost-effective and environmentally sustainable transport system should achieve balance between modes, giving priority to trips made on foot, bicycle or in public transport. This requires the consolidation of compact, mixed use, mixed income nodes where short distances enable walking and cycling, and higher densities support viable quality public transport.

The purpose of this would be to promote spatial justice through improved access to facilities and services, economic opportunities and amenities.

Protect
- Existing walkability of streets, neighbourhoods, villages and towns by limiting lateral sprawl and new car dominated developments.
- Settlements from the negative impacts of congestion

New
- Roads from inappropriate upgrades that will erode their character and role in the economy

Change
- Rationalise the role and function of the N2 where it passes through Knysna to improve integration and access to opportunities for residents and address seasonal congestion
- Improve the quality of the street environment in these primary development nodes to establish “complete streets” while addressing appropriate traffic circulation
- Address the imbalance in land uses within rural settlements, villages and towns to move settlements towards balanced, complete places to reduce the need to move and improve the viability of public transport
- Ensure appropriate investment in social facilities, economic opportunities and residential development improve equitable access and financial sustainability.

Specific spatial implications of this strategy for the Knysna Municipality are:
- Improve the linkages between Rheenendal and Karatara,
- Upgrade the connection between Knysna and Uniondale, without compromising their unique rural character so that Knysna can serve as a service centre for the communities of Uniondale.

Specific improvements are recommended to improve overall accessibility within the KM, these are:
- Establish an integrated public transport access loop connecting isolated communities in Concordia, Masifunde and Knysna north with opportunities along the coastline
- Reinforce an NMT network which connects the system of “complete neighbourhood” nodes within the consolidation priority areas to improve integration between north and south, east and west.
- Ensure that new economic opportunities have appropriate access, e.g. industrial development to have direct access to N2, but activity streets can favour pedestrians and public transport.
- Improve connectivity between Karatara and Rheenendal
- Improve pedestrian and cycle connections through the “Knysna Park” between Masifunde and Concordia and the coastal and employment opportunities to the south

This, in turn, reduces the settlement footprint accommodating the same population but reducing the number of access points to higher order roads like the N2, and significantly reduces the number of pedestrians and cyclists from having to access higher order roads.
Figure 23: Knysna Equitable Access Strategy
5.2.3 Sustainable Growth Management for an Efficient and Just Future

The overriding objective for growth management in the Knysna municipality is to establish a hierarchy of “complete neighbourhoods, settlements and villages”. The emphasis is on establishing what needs to be protected, changed or added in each place to achieve balance, spatial justice, environmental, cultural and financial sustainability and resource efficiency. The main spatial strategy is to consolidate existing settlements rather than support further expansion into green areas.

It is essential for spatial efficiency and sustainability, as required by SPLUMA, to operate within the capacity of infrastructure service and resource capacity to sustain development.

In a context of increasing fiscal austerity, we need to embrace smart growth management – business as usual cannot be sustained. The municipality’s infrastructure and social services are under severe pressure and cannot sustain projected population growth with current technologies, settlement patterns and practices. Backlogs are unlikely to be met using business as usual practices within a context of declining government funding.

This does not imply constraining growth but rather suggests adopting a “smart growth” approach that optimises resources and reduces the pressure on resources by developing in the right way in the right place and prioritising maintenance backlogs and upgrading over development of new infrastructure that adds to the operational, environmental and social burdens.

Liveability, sustainability and regenerative development must be combined to establish sustainable, affordable settlements within the KMA of the future.

Specific regenerative strategies towards achieving balanced and complete settlements within the KMA are proposed as follows:

**Knysna**

Knysna should perform as a “complete town” with a vibrant mix of land uses, economic opportunities and income groups that all have convenient access to services and facilities.

- Establish a linked network of nodes with specific roles that will contribute towards the creation of a complete town and connect isolated communities such as Concordia, White Location, Fleneters and Xolweni into the space economy of the town.
- Harness the energy of the N2 in creating this network of nodes.
- Improve the financial and economic viability of the town by promoting the intensification of existing urban areas (e.g. mixed use development in the existing industrial area), through infill, densification and redevelopment, which in turn makes more efficient use of existing infrastructure capacity and services.
- Ensure that new economic development opportunities are strategically located with access for marginalised communities

**Sedgefield**

The environmental and ground water pollution risks associated with further development in Sedgefield constrain viable densification as areas such as the Island would need full service reticulation to densify without polluting the groundwater and river system.

In addition its unique character as a quiet, slow town is should be protected suggesting that it remain largely a holiday and retirement town.

However, there are opportunities for infill and densification close to the N2 that should be pursued to establish a town centre “heart” for Sedgefield.

**Karatara and Rheenendal**

While these settlements suffer the legacy of lack of investment and spatial fragmentation. New development here needs to be well considered so that poverty, isolation and inaccessibility are not entrenched. Rather investment should:

- Promote the consolidation of the settlements, focusing on infill, redevelopment and balancing land uses to improve economic opportunity rather than encouraging lateral expansion and perpetuating low income, dormitory development.
- Focus on basic service needs and social facilities as well as regeneration of the streets, open spaces and supporting economic activities to serve existing development areas
- Retain small town character through careful design and control of infill development and making “a complete village”.

**Pezula and Knysna Heads**

No further development or densification should be permitted.
Figure 24: Knysna Sustainable and Equitable Growth
5.3 Composite Spatial Development Framework

The composite SDF for the Knysna Municipal Area incorporates the key aspects of the three spatial strategies. These are outlined below.

5.3.1 The Knysna Open Space System (KMOSS)

The designation of a municipal open space network should include areas to be protected and enhanced as part of the biodiversity (CBAs), agricultural, scenic, recreation and landscape network of the municipality. The Knysna MOSS (green network) is verified as a key spatial structuring element of the Knysna Municipal Area and that the exact delineation of this network is undertaken as a matter of priority. This highlights areas to be protected and enhanced as part of the biodiversity (CBAs), agricultural, scenic, recreation and landscape network of the municipality. These areas occur both inside and outside of the urban edge and are intended for protection in perpetuity, irrespective of future amendments to the urban edge.

The assignment of SPCs and clarification of the uses within the SPCs should be undertaken as a matter of urgency. The Eden SDF will be providing guidelines for the range of activities permitted within each of the SPCs to ensure appropriate land uses and rights within these areas.

Within the KMOSS are areas that have previously been identified for potential long term development. This review of the Knysna SDF recommends that these areas are not approved for development within this SDF time horizon but rather that they are the subject of more detailed study prior to being approved for development.

This should include investigations that:
- Ground truth biodiversity resources that must be protected,
- assess the long term capital and operating impacts of development on municipal finances
- establish the social and economic impacts for households of new and existing communities.

5.3.2 Invest in Smart Growth Settlements

To achieve the objectives of SPLUMA and align with regional planning policy frameworks, the establishment of a network of “complete towns and villages” is proposed. Each should have a strong and unique identity, retain and enhance the Knysna coast and forest character and feature:
- Balanced land use
- Densification
- Economic opportunity
- Accessibility
- A high quality public environment
- Effective and sustainable social services

In support of this approach, 6 regeneration nodes are prioritised for investment which improves their accessibility, land use and economic balance and completeness as the anchors of the settlement system of KM.

New development should be prioritised, supported through infrastructure upgrades and incentivised within these nodes in favour of peripheral green field development.

5.3.3 Knysna Connected

That transport and non-motorised transport linkages within and between these priority consolidation nodes are improved to increase accessibility and convenience and reduce the cost of travel. Specifically the framework prioritises:
- linkages between nodes
- upgraded link between Rheenendal and Karatara
- improvements to the Hornlee Interchange with Prins Albert Pass
- Improved urban-rural access

changes to accommodate a wider range of land uses. These nodes are:
1. Knysna Town CBD Mixed Use and Densification Zone (including the regeneration of Grey Street??)
2. Karatara Eco-Industrial Development
3. The Knysna Central Park
4. The conversion of Knysna Industrial Area into a mixed use node that could include small business, education and live-work and gap housing
5. The development of a new green industrial park at Kruisfontein
6. Masifunde Regeneration Node
Figure 25 Knysna Revised Composite Spatial Development Framework
Figure 26: The Knysna Spatial Framework
6 Implementation Framework

6.1 Policies
To take forward the recommendations of this SDF Strategy the following policy statements need to be developed in more detail and adopted by the Knysna Council:
1. Densification policy
2. Knysna Open Space Network Policy
3. CBD Regeneration policy including incentives, zoning amendments and other instruments to achieve “complete neighbourhoods”
4. Urban Edge amendment policy
5. Protection and economic optimisation of the cultural landscape (including passes, coastal settlements and rural villages)

6.2 Guidelines
The following guidelines should be prepared as part of the next review of the Knysna SDF:
1. Densification Guidelines
2. Land use and management guidelines for land within and adjacent to the Knysna Open Space Network
3. Urban regeneration
4. River interface guidelines for new development as well as remedial improvements to existing interfaces.
5. Coastal edge management guidelines
6. Complete street design and development guidelines
7. Complete village design and development guidelines

6.3 Capital Investment Framework
The Spatial Planning and Land Use Management Act (SPLUMA) requires that a SDF contain “…a capital investment framework (CIF) for the municipality’s development programmes, depicted spatially” (Section 21(n)). The SDF guidelines further elaborate that this is required to “align the capital investment and budgeting processes moving forward” (pg. 23) to spatial planning objectives. The underlying questions that the CIF needs to provide guidance on are:
- What do we need to spend where, and on what?
- Is the spatial growth trajectory affordable?
- How does investment implement policy objectives?

The Capital Investment Framework must:
- project the impact that the anticipated population and economic growth, as well as service delivery targets in terms of current needs and backlogs, is likely to have on the demand for infrastructure services, and where this demand will occur in space;
- identify, quantify and provide location requirements of engineering infrastructure and services provision for existing and future development needs for the next 5 years;
- represent the integration and trade-offs of all relevant sector policies and plans;
- guide investment planning and development decisions across all sectors of government;
- provide direction for strategic developments, infrastructure investment, promote efficient, sustainable and planned investments by all sectors and indicate priority areas for investment in land development; and
- outline specific arrangements for prioritising, mobilising, sequencing and implementing public & private infrastructural and land development investment in the priority spatial structuring areas identified in the SDF’s.

Capital projects already in the pipeline have been outlined above, however, the further review of the Knysna SDF should include a clear framework for planning approval and infrastructure investment that includes a fiscal planning tool that can test the financial viability of spatial proposals and their impacts on costs for all spheres of government, communities, businesses and households.

The Eden District is investigating the formulation of a District wide fiscal impact tool that would assist the KM to assess the impacts and costs of various development and growth options over the short, medium and long term.

In line with the SPLUMA principle of good governance, it would be prudent for Knysna and the other B Municipalities within the Eden District to collaborate in the development of a common investment and fiscal planning capacity.

6.4 Spatial Priorities & Precinct Plans
More detailed investigation at the level of local area plans and precinct plans should be carried out for:
- Knysna Town CBD Mixed Use and Densification Zone (including the regeneration of Grey Street…)
- Karatara Eco-Industrial Development
- The Knysna Central Park
- Knysna Industrial Area mixed use node
- Heidevallei Green Industrial Precinct
- Karatara Rural Regeneration Plan
6.5 PROPOSED SDF REVIEW PROCESS

Immediately upon the adoption of the 2017 IDP and Strategic SDF, a comprehensive and systematic review of the IDP, SDF and sector plans will commence so that these are aligned clearly and coherently to direct decision making and investment priorities across all sectors within Knysna Municipality.
7 References


### Annexure 1: Summary of Stakeholder Inputs and Responses

<table>
<thead>
<tr>
<th>Input by:</th>
<th>COMMENT</th>
<th>SDF REVIEW RESPONSE</th>
<th>ALTERNATIVE ACTION</th>
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<tbody>
<tr>
<td><strong>Theme: Environment/ Biodiversity</strong></td>
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<tr>
<td>S Booth</td>
<td>Does the municipality own any land which they can declare protected areas?</td>
<td>To be investigated</td>
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<tr>
<td>S Campbell</td>
<td>It would be wasteful expenditure on ground truthing while it should be in the SDF already.</td>
<td>Present CBA’s are too coarse to draw edges on - they have to be ground truthed as better informants.</td>
<td></td>
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<tr>
<td>SANParks (meeting)</td>
<td>Sanparks - wants site visits to the areas included in the urban edge. - requires conservation corridors to be attended to.</td>
<td>Corridors are addressed in the revision</td>
<td></td>
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<tr>
<td>SANParks</td>
<td>The Knysna Municipality is located in the Garden Route National Park (GRNP) buffer zone and the Biodiversity Policy and Strategy for South Africa for National Park buffer zones should be considered. The municipality is not in the Garden Route National Park (GRNP). Positioning the Knysna Municipality in the context of a National Park buffer zone was not adequately addressed in the Draft ISDF documents. SANParks supports cooperative governance.</td>
<td>To be addressed in the updated SEA</td>
<td></td>
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<tr>
<td>SANParks</td>
<td>Implications of the National Environmental Management: Biodiversity Act (10 of 2004) not incorporated.</td>
<td>To be addressed in the updated SEA</td>
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<tr>
<td>SANParks</td>
<td>Listed threatened ecosystems that are threatened and in need of protection were not incorporated in the Draft ISDF.</td>
<td>To be addressed in the updated SEA</td>
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<tr>
<td>SANParks</td>
<td>SANParks is concerned that large scale development plans are included in the draft SDF without considering biodiversity conservation. If the SDF is approved in its current format it is</td>
<td>No ‘development plan’ will be approved without a proper EIA and ground truthing of CBA’s. Inclusion in the urban edge does not imply blanket approvals on all land inside the</td>
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<td><strong>SANParks</strong></td>
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<td>very likely that critically endangered and endangered lowland fynbos will become extinct.</td>
<td>Section 23 of SPLUMA that deals with environmental requirements was not adequately addressed. (environmental data base in the land use scheme)</td>
<td>The spatial implications of protecting threatened biodiversity and ecosystem services were not adequately addressed in the Draft ISDF. Please include a new bullet point to reflect: ‘Protecting natural areas that provide important ecosystem services and conserve biodiversity of national importance (or something similar).’</td>
<td>The use of old data sets and exclusion of functional conservation corridors to inform spatial planning decision-making. The map in the SDF is not a clear reflection of the 2016 situation and does not include alien degraded areas.</td>
</tr>
<tr>
<td>Data base to be compiled as part of the updated SEA.</td>
<td>Bullet point will be incorporated in the document.</td>
<td>New data sets have to be used in revised SDF and SEA.</td>
<td>Data sets will be correlated and updated in the revisions of the SDF and the SEA.</td>
</tr>
<tr>
<td>SANParks does not support the Environmental Systems maps in the current format. The principle of overlaying the Environmental map with the proposed development maps is supported e.g. the optimal neighbourhood structure map. Having 2 separate maps makes interpretation difficult.</td>
<td></td>
<td>Maps will be co-ordinated in the new revisions.</td>
<td></td>
</tr>
<tr>
<td>SANParks</td>
<td>Development should be prioritised in non sensitive areas.</td>
<td>SPC’s will be aligned.</td>
<td></td>
</tr>
<tr>
<td>SANParks</td>
<td>The spatial planning categories provided in the Draft SEA and Draft SDF are not the same and not supported in the current format.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SANParks</td>
<td>Government is not in a position to purchase properties in the buffer conservation areas at this stage. SANParks supports that a policy to enable conservation incentives on private land is drafted and implemented.</td>
<td>Incentives can be drafted in the revised SDF.</td>
<td></td>
</tr>
<tr>
<td>SANParks</td>
<td>SANParks supports the Development Risk Zone in principle and this zone should be mapped and implemented. If it is not feasible to implement the proposal realistic standards should be set e.g. 6m contours in estuarine areas may not be achievable.</td>
<td>Noted</td>
<td></td>
</tr>
<tr>
<td>SANParks</td>
<td>Guidelines for the management of the spatial categories were not included.</td>
<td>Will be included in the revised SDF.</td>
<td></td>
</tr>
<tr>
<td>SANParks</td>
<td>The Environmental System maps need to be revised and rectified with consideration of Listed Threatened Ecosystems and functional natural corridors that exclude plantations, intensive agriculture and urban areas. The legend is not consistent with the SDF spatial categories.</td>
<td>Maps will be updated and co-ordinated in the new revisions.</td>
<td></td>
</tr>
<tr>
<td>SANParks</td>
<td>The open space network in the Draft SEA is not adequately addressed. SANParks supports that the Steenbok Park and Pledge Nature Reserves (and other Municipal properties that can be managed for conservation) are zoned for conservation. Private land parcels with high biodiversity value or important for connectivity in the landscape, where landowners are willing to conserve land voluntarily (non-statutory conservation) should also be zoned for conservation. SANParks supports that incentives are provided for landowners that choose to conserve biodiversity and do not choose to develop their properties.</td>
<td>Guidelines for private land incentives will be provided in the new SDF. The open space network has to be addressed and updated in the new revisions.</td>
<td></td>
</tr>
<tr>
<td>SANParks</td>
<td>The proposed ecological corridors in the Draft SDF are supported in principle but the map, based on the 2005 Rapid Conservation Assessment and Corridor Design for the Knysna Municipality prepared by Lombard, Strauss, Vlok, Wolf and Cameron needs to be updated to address corridor conservation satisfactorily in 2016 and beyond.</td>
<td>Noted</td>
<td>Map to be updated in updated SEA.</td>
</tr>
<tr>
<td>SANParks</td>
<td>The proposed ecological corridors include portions of the GRNP and Goukamma Nature Reserve in an ad hoc manner. Furthermore, the corridors traverse urban areas and plantations. SANParks supports that a realistic corridor layer is developed and included in the development proposal maps to ensure the integrity of corridors are maintained. Proclaimed conservation areas could form the core with linkages to maintain pattern and processes. River corridors and wetlands should also be mapped and managed for conservation.</td>
<td></td>
<td>Will be attended to in the revised SDF and updated SEA.</td>
</tr>
<tr>
<td>SANParks</td>
<td>A survey of the riparian associated wetlands in the Knysna Protected Environment was completed in January 2016 by SANParks. Wetlands should be protected and no further infilling for development is supported by SANParks.</td>
<td>Noted</td>
<td></td>
</tr>
<tr>
<td>SANParks</td>
<td>In the duty of care section in the Draft SEA it is stated that it is only possible to protect steep slopes and valleys around rivers. This is an untrue statement. There are various opportunities available to protect lowland fynbos on private land.</td>
<td></td>
<td>To be revised in the updated SEA.</td>
</tr>
<tr>
<td>SANParks</td>
<td>Sanparks wants the CBA maps to be used as final demarcation tool.</td>
<td>CBA’s are too coarse and inaccurate for use as a site specific planning informant - needs to be ground truthed.</td>
<td></td>
</tr>
<tr>
<td>General</td>
<td>No go areas/ environmental assets to be protected within urban edge will be identified.</td>
<td>Some areas will need local SDF’s SEA to be aligned with the development of</td>
<td></td>
</tr>
<tr>
<td>SANParks</td>
<td>Need to think about environment as more than biodiversity.</td>
<td>capital investment framework</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Cape Nature</td>
<td>The SEA that was done in the ISDF needs to be updated in terms legislation to comply.</td>
<td>Noted</td>
<td>To be revised in the updated SEA.</td>
</tr>
<tr>
<td>Cape Nature</td>
<td>WC Biodiversity Sector Plan and WC Biodiversity Framework not mentioned.</td>
<td>Noted</td>
<td>To be included in the updated SEA and used in the revised SDF.</td>
</tr>
<tr>
<td>Cape Nature</td>
<td>SDF has to incorporate CBA data from these documents.</td>
<td>Will be done in revised SDF. CBA areas within the urban edge are not lost but has to be ground truthed, recorded and acknowledged in EIA’s and planning.</td>
<td>To be included in the updated SEA and used in the revised SDF.</td>
</tr>
<tr>
<td>Cape Nature</td>
<td>Amendments to urban edge in certain areas SDF will result in direct loss of CBA, e.g. in Sedgefield, Windmeul and Heidevallei and housing projects. Areas will encroach too closely to CBA areas.</td>
<td>Exact lines of urban edge to revised after ground truthing of CBA’s.</td>
<td>To be included in the updated SEA and used in the revised SDF.</td>
</tr>
<tr>
<td>Cape Nature</td>
<td>Knysna Central Park is is dominated by least Threatened vegetation. Investment could be better spend in CBA areas. However, the municipality has to approach Cape Nature with a detailed description of the concept.</td>
<td>The Central Park will have several socio-economic benefits as described in Chapter 14 of the SDF. A precinct plan is needed with which Cape Nature could be approached.</td>
<td></td>
</tr>
<tr>
<td>Cape Nature</td>
<td>In the Open Space Network section the initiatives of Conservation Stewardship by SANparks, Cape Nature and the private sector is not mentioned.</td>
<td>Noted. Could be added in next revised SDF.</td>
<td>To be included in the updated SEA and in revised SDF.</td>
</tr>
<tr>
<td>C Bester</td>
<td>There is significant potential for the application of bioregional planning and urban bioregionalism to facilitate a reconnection of human-environment links and improve the liveable urbanism of its citizens. Such an approach would be in keeping with the sense of place of the area, and would inherently implement the internationally recognised interdependence model of sustainability.</td>
<td>Noted</td>
<td></td>
</tr>
<tr>
<td>C Bester</td>
<td>Bioregional planning, urban bioregionalism and water sensitive settlement design are technically available and Knysna is significantly well-suited to their application. These approaches can be</td>
<td>Noted</td>
<td></td>
</tr>
</tbody>
</table>
incrementally implemented and embedded during the 15-year time frame. This would inherently address socially inclusive service delivery, while reducing climate change vulnerability and positioning Knysna as an international leader in authentically sustainable development while nourishing, rather than eroding, the highly valuable and unique sense of place of Knysna.

Public meeting

Municipality must ensure that all catchment areas are cleared of all alien vegetation to save water. Initiate water saving awareness and educational programs.

Noted

Theme: Sustainability, energy resources, climate change

C Bester

There is significant opportunity to ensure that the ISDF engages with and integrates the necessary low-carbon and sustainable development transformations necessary to navigate the sustainability transition time horizon as best as possible.

Noted

C Bester

The 30-year SDF does not currently engage with land-based climate change and ecosystem degradation impacts on water supply systems, and thus is considered to represent a significant future planning risk in terms of climate change adaptation.

Noted

C Bester

Development proposals that seek to increase the urban and / or rural population above the ecological carrying capacity and organic population growth rate of an area has the potential to facilitate a number of social ills, including an increase in slum urbanism and job competition. There are very few examples where such an approach of ‘stimulus’ growth has been successful and sustainable beyond short-term benefits to a few that lock in long-term problems for many.

Noted. Has to be managed.
<table>
<thead>
<tr>
<th>SANParks</th>
<th>Climate change adaptation measures should be put in place. No enhanced rights should be approved for new developments in high hazard zones.</th>
<th>Noted</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Disaster management plan should address flooding too.</td>
<td></td>
</tr>
<tr>
<td><strong>Theme: Rural Settlements</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>S Campbell</td>
<td>The forestry villages need a special zoning category to be recognised as urban. They experience a problem with Rural Development declining transfers for ownership as the village are not regarded as urban as required by the legislation that they are using (e.g. Brackenhill).</td>
<td>Will be attended to in the revised SDF and the new scheme regulations.</td>
</tr>
<tr>
<td>Public meeting</td>
<td>Land reform in the rural areas to be considered.</td>
<td>This will be integrated into the future SDF review process in a coherent and responsible manner</td>
</tr>
<tr>
<td><strong>Theme: Settlement Footprint/ Urban Edge/ Densification</strong></td>
<td></td>
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</tr>
<tr>
<td>S Campbell</td>
<td>Do not expand the urban edge without the SEA being done. We must go up if we want to densify and be creative with provision of parking. Areas of expansion proposed in the 2016 SDF have to be further investigated.</td>
<td>Will be reconsidered and integrated with the updated SEA.</td>
</tr>
<tr>
<td>S Campbell</td>
<td>The topography of Knysna is the starting point to decide where you should or should not develop. The SDF must have a clear statement on limitations on steep slopes, such as the old Guide plans on 1:4 slopes.</td>
<td>Noted. The 1:4 slope is, or should be checked in all applications.</td>
</tr>
<tr>
<td>R. Christians</td>
<td>Towns are being developed between the have’s and the have not’s. It seems as if densification only takes place in the poorer area while the have’s still get the large erven and plots. The limitations on sprawl and large erven in the SDF, will affect the ‘haves’ more than the ‘have nots’.</td>
<td></td>
</tr>
<tr>
<td>W Dewberry</td>
<td>There must be a more equitable paradigm shift. We let the system determine the densification. It is “new liberalism” to develop Heidevallei for the rich people first to see if it will work. The land was taken from the poor and now they must wait to see if the plan works with the rich getting in there first.</td>
<td>The revised SDF will have to comply with the SPLUMA principles of social and spatial justice.</td>
</tr>
<tr>
<td>Oits’</td>
<td>Rather contract the urban edge than expanding</td>
<td>Expanding the urban edge must be linked to</td>
</tr>
<tr>
<td><strong>Comments</strong></td>
<td><strong>Description</strong></td>
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<tr>
<td>S Campbell</td>
<td>Densification is not a one size fits all. Local circumstances must determine it – overlay zones can give guidance.</td>
<td></td>
</tr>
<tr>
<td>TV3</td>
<td>Knysna River Reserve (approved mix use development on Farm 191/45 and 488) to be included in the urban edge.</td>
<td></td>
</tr>
<tr>
<td>VPM</td>
<td>DEADP does not want to consider resorts outside the urban edge.</td>
<td></td>
</tr>
<tr>
<td>VPM</td>
<td>Sedgefield urban edge differs from 2008 SDF. Previously northward expansion now omitted and southward expansion shown instead. No motivation given.</td>
<td></td>
</tr>
<tr>
<td>VPM</td>
<td>ERF 1638 And 205/82 was previously earmarked for development and applied for. Now omitted from urban edge without reason.</td>
<td></td>
</tr>
<tr>
<td>VPM</td>
<td>Welbedacht proposed for densification in SDF. HOA’s not aware of this. It is a low density area and includes a core conservation area in a proclaimed nature reserve. Proposed area too high in vicinity of conservation area and it should rather be earmarked as Transition area.</td>
<td></td>
</tr>
<tr>
<td>S Campbell</td>
<td>At the Western Heads the road must be the cut off line with Winde’s property a transition area.</td>
<td></td>
</tr>
<tr>
<td>Public meeting</td>
<td>Smutsville is overcrowded and informal settlements are threatening the dune system. Municipality needs to act against illegal squatting.</td>
<td></td>
</tr>
<tr>
<td>SANParks</td>
<td>The urban edge and infill areas are confusing. The spatial zoning categories make provision for a range of development zones. From the maps some of these areas are located in areas with high biodiversity value or in development risk zones. Stretching the urban edge outside of conventional urban areas. Inclusion in the urban edge does not imply blanket approvals on all land inside the edge. A spatial budget has to guide the need for residential expansion together with the principle of densification that should limit it.</td>
<td></td>
</tr>
</tbody>
</table>
The 'expanded' urban edge layer in its current format is not supported. Some developments e.g. Simola and Pezula were approved and Environmental Authorisations issued with conditions for conservation. Extending the urban edge to Noetzie and along the Knysna River at Simola is problematic for conservation. The urban edge at Myoli beach and Groenvlei includes important natural corridors and wetlands. The urban edge as proposed will change the sense of place and have a negative impact on conservation. SANParks suggests that a workshop and fieldtrips take place before the urban edge layer is finalised.

SANParks support that care should be taken to not allow for infill development on strategically located and well-functioning public open spaces.

### Theme: Transition areas

| VPM | SDF shows some transition areas inside and some areas outside the urban edge. More consistence needed; also in terms of Provincial documents. | Consistent allocation of transition areas has to be considered in the revision process. |
| VPM | Transition areas not well defined and not clearly mapped. Westford area to be shown as Transition area and fragmented into small pockets with different pockets of land uses. | Transition areas have to delectation clearly as inclusive contained areas and not fragmented. |
| VPM | Farm 488 to be earmarked as Transition area as the potential lies in Conservation and not farming. | Has to be re-considered in the revised SDF. |

### Theme: Noetzie issues

| K Environ. Forum | Why is Noetzie still inside the urban edge while it was agreed to earmark it as outside? | We are not acquainted with the discussions and reasons why to should be outside the urban edge. It is an urban area. |
| K Environ. Forum | | Noetzie needs a precinct plan and overlay zone to guide the preservation of the node. |

### Theme: Rheenendal issues

| A | Local inputs in their own LSP to be included. | We are not acquainted with the discussions |
| A | | Rheenendal needs a precinct plan and |

A workshop may form part of the process for a revised urban edge.
<table>
<thead>
<tr>
<th>Robinson</th>
<th>Consider the local attributes like scenery, historical interests and tourism. and proposals.</th>
<th>overlay zone to guide the preservation of the node.</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Robinson</td>
<td>Note</td>
<td>Noted</td>
</tr>
<tr>
<td>C Bester</td>
<td>The proposal in Rheenendal, has the potential to facilitate a number of social ills, including an increase in slum urbanism and job competition. This will also irreversibly degrade the quiet rural sense of place of the area, one of the remaining authentic rural areas in the Western Cape.</td>
<td>Noted. Proposals for growth need to be managed.</td>
</tr>
<tr>
<td>C Bester</td>
<td>The focus should be on a low tech, high job creation opportunity ‘Keurhoek First’ approach, including skills development, artisanal entrepreneurship, local dwelling building, sustainable community, densification and improving liveability and resilience through soft infrastructure water systems, community food gardens and social amenities. No additional population should be attracted into the area until the population of Keurhoek that has been without job opportunities and social facilities for so long, has been addressed. To do otherwise would be a gross social injustice.</td>
<td>The allocation of jobs, if municipal, have to be managed.</td>
</tr>
</tbody>
</table>

**Theme: Sedgefield issues**

| VPM | SDF states that there is no particular need for urban expansion while support if community for a planning proposal showed that there is a need. | Has to be re-considered in the revised SDF: |

**Theme: Access**

<table>
<thead>
<tr>
<th>Public meeting</th>
<th>The N2 is the aorta of economic development of the town. The economy is going to be throttled if it continues in the way it is now. The by-pass is urgent. The municipality must commit themselves to this as SANRAL said they are not going to do the EIA. A decision is needed about the route through Sedgefield. The railway line must be re-vitalized. There are private plans for this.</th>
<th>Negotiations are taking place on Eden DM level to obtain a firm commitment on their routes and construction programme.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Noted</td>
</tr>
<tr>
<td>VPM</td>
<td>New roads proposed in SDF must be subject to TIA’s first before shown on a 30 year plan - it effects the densities proposed along the routes.</td>
<td>It is the ideal but impractical to budget for all the TIA’s first.</td>
</tr>
<tr>
<td>Theme: Infrastructure</td>
<td></td>
<td></td>
</tr>
<tr>
<td>S Campbell</td>
<td>Water management: Formulate a policy to discourage plantations in catchment areas, e.g. in the Goukamma and Uitzicht catchment areas.</td>
<td>Should form part of the Services Master plan.</td>
</tr>
<tr>
<td>S Davis</td>
<td>We need to build a dam in the Gouna river.</td>
<td>Should form part of the Services Master plan.</td>
</tr>
<tr>
<td>Public meeting</td>
<td>Minimalization of 50% water wastage occurring through the current water pipeline.</td>
<td>Should form part of the Services Master plan.</td>
</tr>
<tr>
<td>SANParks</td>
<td>Water availability for new development is an issue</td>
<td>Should form part of the Services Master plan.</td>
</tr>
<tr>
<td>SANParks</td>
<td>Waste water treatment for new development is an issue</td>
<td>Should form part of the Services Master plan.</td>
</tr>
<tr>
<td>VPM</td>
<td>Services Master Plan need to be approved with an action plan first and SDF proposals must correspond to it.</td>
<td>Has to be co-ordinated during the revision process.</td>
</tr>
<tr>
<td>VPM</td>
<td>New storage dam in Knysna river by 2020 – statement or fact?</td>
<td>Has to be clarified – the Services Master plan to be consulted.</td>
</tr>
<tr>
<td>Theme: Economy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public meeting</td>
<td>It looks as if we just want to comply with the legislation while we need employment for the people. Should be a strategic document that facilitates growth.</td>
<td>Compliance is required by law but the SDF is sufficiently strategic to facilitate growth. It must read together with the Economic Development Strategy.</td>
</tr>
<tr>
<td>Theme: Heritage</td>
<td></td>
<td></td>
</tr>
<tr>
<td>HWC</td>
<td>Present inventory of heritage resources not satisfactory. Need to comply to HWC standards</td>
<td>It will have to be separately budgeted for a part of a new process.</td>
</tr>
<tr>
<td>General</td>
<td></td>
<td></td>
</tr>
<tr>
<td>S Davis</td>
<td>Our environment is the plus factor while our topography and water resources and the N2 are the challenge factors. Draft a set of priorities as a basis to see how the ‘silos’ of assets can work together.</td>
<td>The spatial drivers of change and the spatial strategies will guide the priorities.</td>
</tr>
<tr>
<td>C Bester</td>
<td>Knysna can lead the way for South Africa, and be an international case study of applied</td>
<td>Unclear as to what must be changed.</td>
</tr>
</tbody>
</table>
sustainable development planning. The currently articulated DRAFT ISDF will not achieve this, and appears to represent a relatively weak Green Economy approach that is well within business-as-usual neoliberal economics. This will facilitate increasing vulnerability for the poorest citizens.

**Legislative Aspects**

<table>
<thead>
<tr>
<th>Public meeting</th>
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<tbody>
<tr>
<td>Consult the old Western Head Structure Plan for guidance.</td>
</tr>
<tr>
<td>Consult the Fisherman's walk plan from Nicki Diedericks for Brenton on Sea.</td>
</tr>
<tr>
<td>Consult the Welbedacht/Eastford Structure Plan.</td>
</tr>
<tr>
<td>Consider the Rheenendal LSP</td>
</tr>
</tbody>
</table>

All the previous Structure plans have to be updated to SDP's and aligned with SPLUMA principles. Some could be precinct plans or the principles incorporated in an overlay zone in the new zoning scheme regulations.

<table>
<thead>
<tr>
<th>How the new zoning scheme can assist in achieving the objectives.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The new Knysna Zoning Scheme will be based on the provincial standard regulations with adjustments where required for local circumstances.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Use overlay zones to address natural areas and steep slopes analysis to indicate where densification is not desirable. Densification is not a 'one size fits all'.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Specific limitations in an area could be incorporated in SDP's or in overlay zones in the scheme regulations.</td>
</tr>
</tbody>
</table>

**Mapping**

<table>
<thead>
<tr>
<th>VPM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pdf maps are not clear and too much information, eg. slopes and low lying areas, hatched on SDF map</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>General</th>
</tr>
</thead>
<tbody>
<tr>
<td>More clear demarcation of urban and transition areas needs to be done and consistency between categories on maps must be achieved. Demarcation lines for urban edges and transitions area must be rounded off and not create fragmented areas.</td>
</tr>
</tbody>
</table>

Noted