

KNYSNA ERF 3116

APPLICATION FOR:

REZONING & PERMANENT DEPARTURE



CLIENT: MA CONYERS
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SECTION A :

BACKGROUND

1. BACKGROUND

Knysna Erf 3116 (hereafter referred to as “the application area”) is located at 6 Cuthbert Street, Kanonkop, Knysna, and is currently zoned as “Single Residential Zone I (SRI)”, in terms of the Knysna Municipality Zoning Scheme By-law, 2020 and is 8640m² in extent.



FIGURE 1: LOCALITY PLAN

The application area has been used as a guest house for several years, and the landowner envisages expanding the guest house with two additional suites / bedrooms. Before 2009, the Knysna Municipality had a B&B Bylaw in place, that allowed for tourist accommodation establishments as a primary right on single residential zoned properties, up to a maximum of 5x guest rooms / 10 guests. The Knysna B&B Bylaw was repealed during 2009, **without notifying any tourist accommodation establishments** of the repeal of the bylaw – the only notification was a Provincial Gazette notice. Then, during 2020, when the new Knysna Zoning Scheme Bylaw came into operation, a guest house was allowed as a consent use on a single residential zoned property, but limited to only 12 persons. The proposal is that Kanonkop House, with the new, additional guest suites, will have a manager’s unit and 9 guest rooms. An application for a rezoning will therefore be required to “General Residential IV” to allow a ‘Guest Lodge’.

Since the application area will fall into a new zoning category (“General Residential IV”), new building lines are applicable. As the building lines are more restrictive (4,5m instead of 2m), and the existing bedrooms extension & deck are constructed on the 2m building line, a permanent departure for a building line relaxation will be required to allow the existing structures within the new, stricter building lines.

1.1. Pre-Application Consultation

The required pre-application consultation was conducted with Knysna Municipality on 16 October 2025 for the intended application. The Knysna Municipality has requested that floor plans be provided for the rooms. See **Plan 4** for the plans as requested. The pre-application consultation panel did not highlight any red flags or major concerns regarding the intended application. A copy of the pre-application consultation meeting minutes is attached as **ANNEXURE A**.

2. THE APPLICATION

Marika Vreken Urban and Environmental Planners have been appointed by **MARK ANDREW CONYERS** to prepare and submit the required application documentation (*refer to ANNEXURE B: Signed Power of Attorney*) and **ANNEXURE C** for the Application Form, for:

- (i) The rezoning of Knysna Erf 3116 from 'Single Residential Zone I (SRI)' to 'General Residential Zone IV (GRIV)' in terms of Section 15(2)(a) of the Knysna Spatial Planning and Land Use Management Bylaw (2021), to allow a guest lodge with 9x guest rooms and a Manager's Unit.
- (ii) A permanent departure in terms of Section 15(2)(b) of the Knysna Spatial Planning and Land Use Management Bylaw (2021) for the relaxation of the northern side building line from 4,5m to 2m to allow for the existing buildings in a new zoning category.

3. PROPERTY DESCRIPTION, SIZE AND OWNERSHIP

A copy of the Title Deed T9437/2017 that includes the information outlined below is contained in **ANNEXURE D**. The SG Diagram (SG 9255 - 83) for Knysna Erf 3116 is contained in **ANNEXURE E**.

Property Description:	Erf 3116 Knysna in the Municipality and Division of Knysna Province of the Western Cape.
Suburb & Town:	Kanonkop, Knysna
Title Deed No:	Title Deed No:
Property Owners:	Mark Andrew Conyers; Jamed Milthorp Conyers & Samantha Jayne Conyers
Property Size:	8640m ² (Eight Thousand Six Hundred and Forty) square metres
Title Deed Restrictions:	None
Servitudes:	Servitudes:
Bonds:	None

SECTION A :**DEVELOPMENT PROPOSAL****4. DEVELOPMENT SPECIFICATIONS**

(Plan 3: Existing approved building plans)

The Applicant has been operating a guest house for more than 16 years, and envisages expanding the guest house with two additional suites / bedrooms.

4.1. Proposed Guest Lodge

The property has been used as a guest house for more than 16 years, and envisages expanding the guest house with two additional suites / bedrooms, in order to improve the financial viability of the guest house. The proposal is that Kanonkop House, with the new, additional guest suites, will consist of a manager's unit and 9 guest rooms.

Six existing structures exist on the application area. These structures include the existing guard house, existing garage, bedrooms extension & deck, existing laundry house, existing storeroom, existing dwelling, and a double-storey building with a basement to the east of the dwelling. There are seven (7x) guest rooms in the existing guest house:- two (2x) in the bedroom extension & deck with an accompanying administrative office, two (2x) rooms in the existing dwelling with a bar, kitchen, living room area, and a therapy / treatment room. Three(3x) more rooms are situated in the double-storey building with a basement to the east of the existing dwelling.

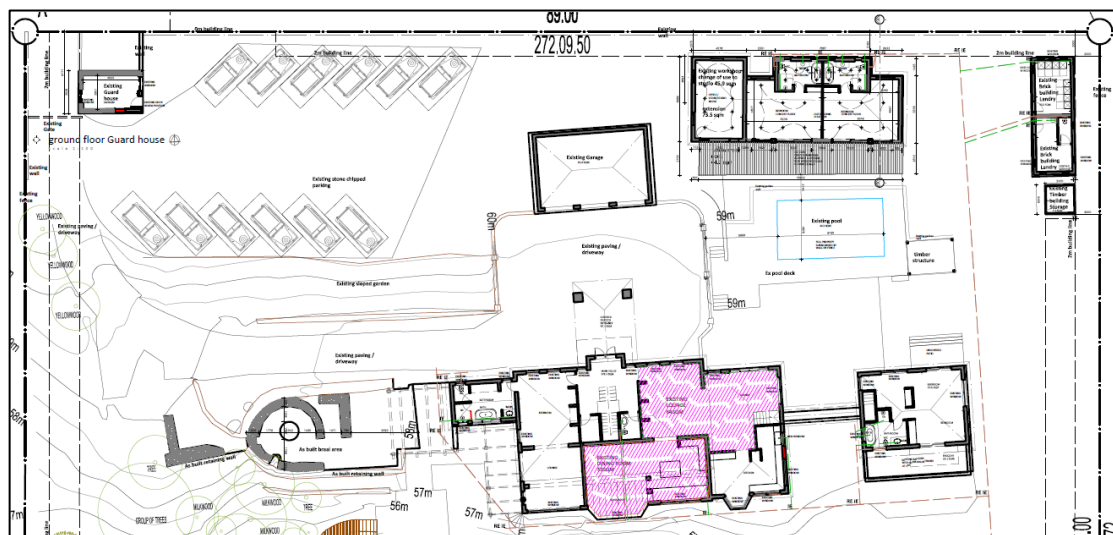


FIGURE 2: EXTRACT - EXISTING STRUCTURES ON KNYSNA ERF 3116

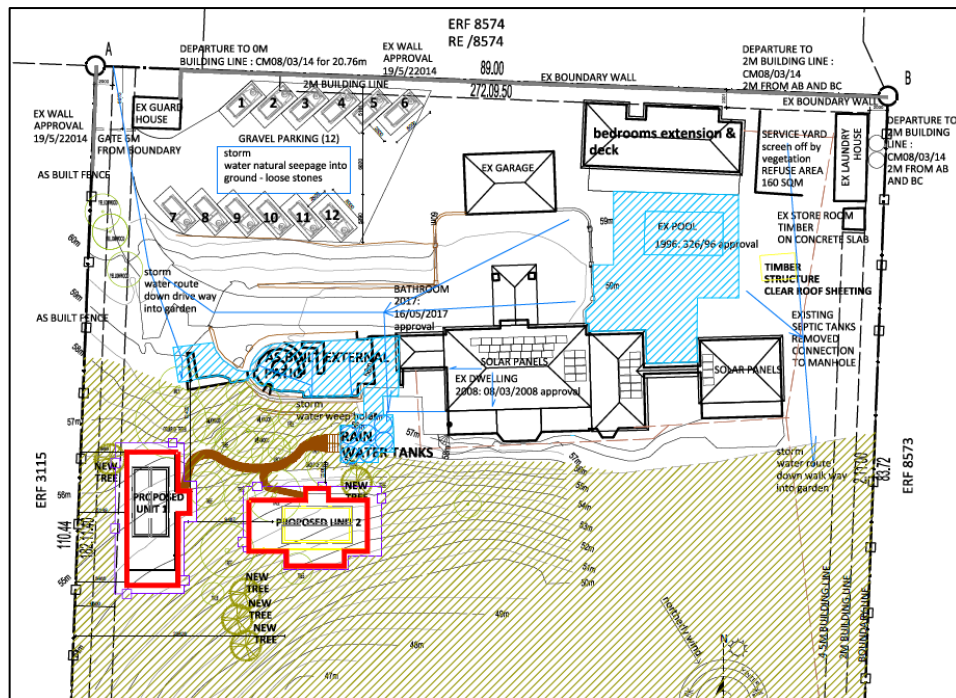


FIGURE 3: PROPOSED SITE DEVELOPMENT PLAN

4.2. Additional Guest Suites

It is proposed to add two loose-standing additional guest suites / bedrooms to the south-west of the existing dwelling house. These additional identical suites / bedrooms will each consist of an en-suite bedroom and lounge. No kitchens / catering facilities are provided in the guest rooms. All guests eat in the communal lounge in the main dwelling.

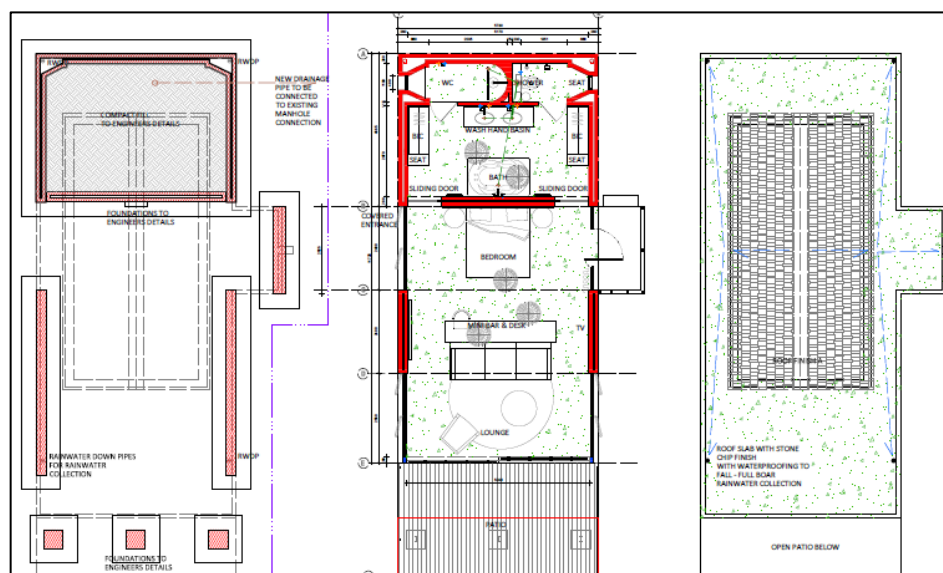


FIGURE 4: NEW PROPOSED SUITES / BEDROOMS

The proposed two (2x) new guest suites will be single storey, and the finish will be of darker shades, and natural elements such as stone and timber, that will blend in with the natural environment.



FIGURE 5: ARTIST'S IMPRESSION OF THE PROPOSED NEW GUEST SUITES

4.3. Access and Parking

Knysna Erf 3116 currently obtains access directly off Cuthbert Street. The application area has only $\pm 12\text{m}$ street frontage, the other property boundaries are all regarded as lateral boundaries.

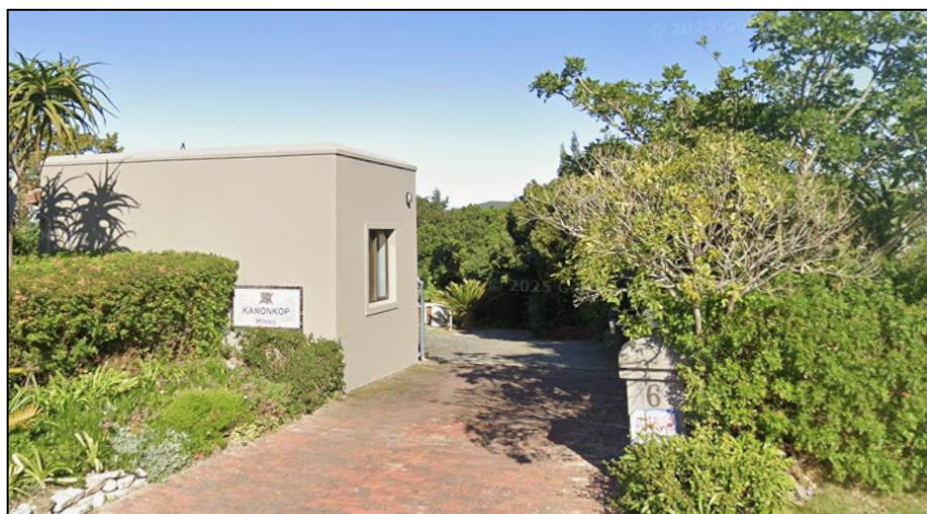


FIGURE 6: EXISTING ACCESS AS SEEN FROM CUTHBERT STREET

The Knysna Municipality's Zoning Scheme By-law (2020) prescribes a minimum width of 5m and a maximum width of 8m for a combined entrance and exit way. As the access to the property is 6m wide, the access complies with the parameters as set out in the Knysna zoning scheme.

The parking parameters for a guest lodge is 1 bay per bedroom plus 1 bay per owner's home / manager's flat. With the 7 guest rooms that already exist on the application area, and the proposed 2x additional suites / bedrooms, there will be a total of 9x guest rooms. A manager will also be living on the property, and therefore the parking parameters are as follows:

$$(1 \text{ bay} \times 9 \text{ bedrooms}) + (1 \text{ bay} \times 1 \text{ manager's flat}) = 10 \text{ parking bays}$$

12x parking bays are provided near the entrance of the application area, with an additional three (3x) additional parking bays in the existing garage. There is ample space for at least 3x more parking bays near the garage. Therefore, more than ample parking bays can be provided and the proposal complies with the prescribed parking requirements as set out in the Knysna Municipality Zoning Scheme By-law (2020).

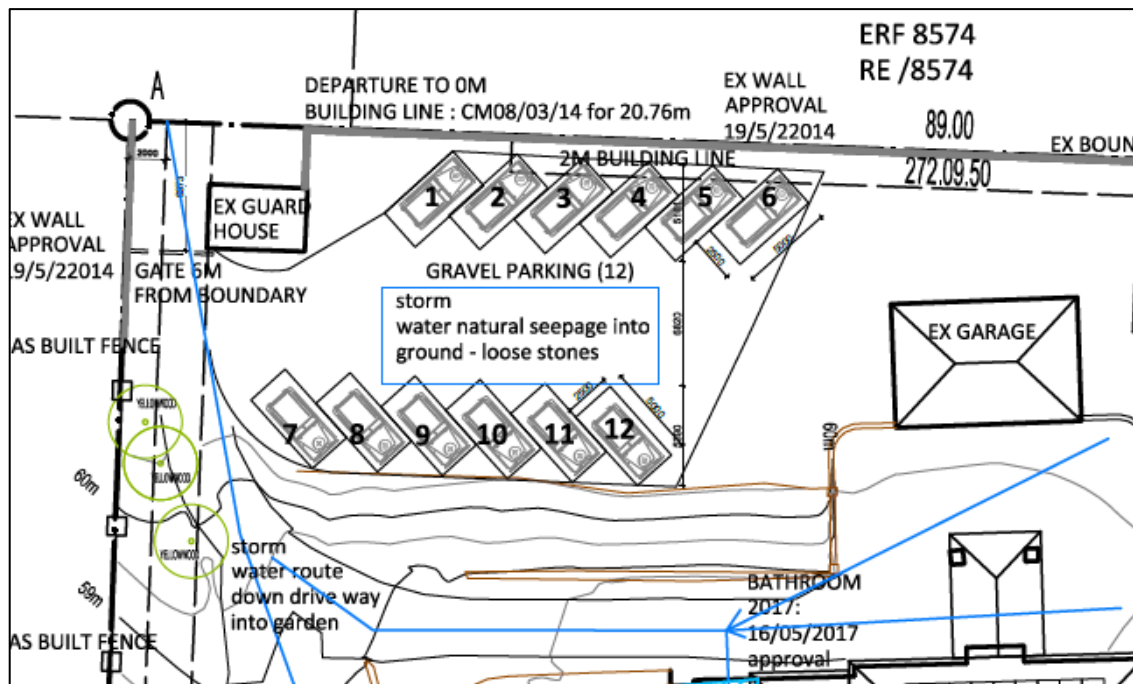


FIGURE 7: PARKING AND ACCESS PROVIDED

5. STATUTORY SPECIFICATIONS

The following land development applications are lodged in terms of the Knysna Municipality: Spatial Planning and Land Use Management By-law (2021), to achieve the desired outcome.

5.1. Rezoning

The primary land use right for "Single Residential Zone I (SRI)" in terms of the Knysna Municipality: Zoning Scheme By-Law, 2020 is 'dwelling house' that allows for one single dwelling house with the accompanying outbuildings, as per the definition quoted below:

"dwelling house" means a building containing only one dwelling unit, together with such outbuildings as are ordinarily used with a dwelling house, including:

- (a) a storeroom and garaging;*
- (b) a second dwelling or additional dwelling, with a floor area which does not exceed 60 m²; provided that application for consent use must be submitted if the second dwelling or additional dwelling is larger than 60m²;*
- (c) a braai room;*
- (d) renewable energy structures for household purposes;*
- (e) home occupation;*
- (f) letting to lodgers;*
- (g) a bed and breakfast establishment; and*
- (h) home childcare.*

In order to allow the dwelling on Knysna Erf 3116 to be utilised as a "Guest Lodge", the application area must be rezoned from 'Single Residential Zone I (SRI)' to 'General Residential Zone IV (GRIV)' in terms of Section 15(2)(a) of the Knysna Spatial Planning and Land Use Management Bylaw (2021).

"guest lodge" means an appropriately scaled establishment that provides temporary residence for transient guests lodging and meals are provided and:

- (a) includes a small conference or training facility and also caters for business meetings, and*
- (b) does not include a restaurant or backpackers' lodge.*

5.2. Permanent Departure

The proposal to rezone the application area from single residential zone I to general residential zone IV brings a change in the development parameters as set out in the Knysna Zoning Scheme Bylaw (2020). With the change in zoning, the building line changes from 2m (single residential) to 4,5m (general residential). As the existing bedrooms extension & deck is situated on the 2m building line (single residential), a permanent departure will be required to allow the existing structures in the stricter building lines of the new zoning category.

According to Section 21(1)(d) of the Knysna Municipality Zoning Scheme By-law (2020), a gatehouse is permitted within the building lines of the property, hence no building line relaxation is required for the gatehouse.

Thus, an application is made for a permanent departure for a building line relaxation in terms of Section 15(2)(b) of the Knysna Municipality: Spatial Planning and Land Use Management By-law (2021), on Knysna Erf 3116:

- (i) The relaxation of the prescribed northern lateral side building line from 4,5m to 2 m to allow the existing bedrooms extension & deck.

5.3. Knysna Municipality Zoning Scheme By-law (2020)

A summary of the prescribed development parameters for the proposed rezoning to "General Residential Zone IV (GRIV)" - 'guest lodge' for Knysna Erf 3116, and a comparison of the proposed development's parameters are shown in the table below:

Prescribed Development Parameter		Knysna Erf 3116	Compliance
Coverage:	60%	9%	Comply
Primary Use:	'Guest Lodge'	'Guest Lodge'	Comply
Floor Factor:	May not exceed 1	<1	Comply
Height:	May not exceed 8,5m	<8,5m	Comply
Building Lines:	Northern Street building line: 5m	5m	Comply
	Northern Side building line: 4,5m	2m	Departure Required
	Eastern Side building line: 4,5m	4,5m	Comply
	Southern Rear building line: 4,5m	4,5m	Comply
	Western Side building line: 4,5m	4,5m	Comply
Parking:	1 bay x bedroom + 1 bay per owner's home / manager's flat = 10 parking bays	>10 parking bays	Comply
Access:	Between 5m and 8m	6m	Comply
Open Space:	Must have access to an outdoor living area on the land unit	provided	Comply
	At least 10% of the net area must be provided	Only 9% coverage on the property. the rest is vacant or public open space for relaxation.	Comply
Service Yard:	Must be provided	Provided	Comply
Refuse Room	Must be provided	Provided	Comply

6. CIVIL SERVICES INFRASTRUCTURE

The property is currently connected to the municipal service infrastructure of Knysna Municipality and is situated within the urban edge of Knysna. In addition to these municipal connections, the property is also augmented by various off-grid service systems, as outlined below:

6.1. Water

Water is collected through a rainwater harvesting system that captures runoff from the roofs of the existing structures on the property. At present, the property has storage tanks with a total capacity of approximately 35,000 litres. An additional 20,000 litres of storage will be installed as part of the construction of the two new suites, bringing the total rainwater storage capacity to around 55,000 litres. The harvesting of rainwater is in addition to the municipal water supply.

6.2. Electricity Supply

In addition to receiving electricity from Knysna Municipality, the property is equipped with a solar power system that supplements the municipal supply. The system has sufficient capacity to operate the guest lodge entirely off-grid if required; however, it currently functions as a supplementary source to the municipal electricity supply.

SECTION B :**CONTEXTUAL INFORMANTS****7. LOCALITY***(PLAN 1: Locality Plan)*

Knysna Erf 3116 is located at Cuthbert Street, Kanonkop, in Welbedacht, Knysna. The application area is located East of "Knysna Hollow", approximately $\pm 280\text{m}$ south east of "The Friday Market" at the Montessori School, and located approximately 2,2km west of the Knysna CBD.

The coordinates to the centre of the property are located at **$34^{\circ} 2'11.78''\text{S}$** and **$23^{\circ} 1'19.25''\text{E}$** .

**FIGURE 8: LOCALITY****8. CURRENT LAND USE AND ZONING****8.1. Land Use**

Knysna Erf 3116 is currently used as a guest house, and it is proposed to expand this use by adding two additional en-suite guest rooms, thereby formalising the operation as a guest lodge.

The existing structures on the property include a guard house, garage, bedroom extension with deck, laundry house, storeroom, main dwelling, and a two-storey building with a basement, located to the east of the dwelling. The proposed additions will not alter the existing land use, which will remain consistent with its current guest accommodation function.



FIGURE 9: EXISTING STRUCTURES ON ERF 3116

8.2. Zoning

Knysna Erf 3116 is currently zoned 'Single Residential Zone I (SRI)' in terms of the Knysna Municipality Zoning Scheme By-Law, 2020. The application is to rezone the application area from "Single Residential Zone I" to "General Residential Zone IV" to allow a 'Guest Lodge'.



FIGURE 10: EXTRACT – KNYSNA ZONING MAPS

9. CHARACTER OF THE AREA

(Plan 2: Land Use Plan)

The application area is located in Kanonkop, Knysna, an area characterised by relatively large residential erven, many of which have been subdivided or redeveloped to accommodate higher-density residential uses, such as group housing developments. The surrounding area comprises a diverse mix of land uses, including the Knysna Hollow Country Estate, the Knysna Estuary, single residential erven, vacant erven, a mixed-use erf, the Knysna Montessori School, a business erf, public and private open spaces, and various guest accommodation facilities.

Within a 400 m radius of the application area, there are several established guest accommodations, including Villa Mulligan, The Little Mazot, Salt River Lodge – Self-Catering Knysna, Knysna Penthouse, Knysna Private Estate Studio Suites with lagoon views, and the existing accommodation on the application site itself (Kanonkop House).

As the proposed development will maintain the existing land use, and given the prevalence of guest accommodation in the immediate vicinity, the proposed rezoning is consistent with the established character of the area. It will complement the surrounding uses rather than introducing a land use that is out of context, thereby supporting the ongoing tourism and hospitality function of the Kanonkop precinct.



FIGURE 11: EXTRACT – LAND USE PLAN

The area has retained its predominant residential character, but with an increase in density. It can, therefore, be concluded that the proposed development will be consistent with the surrounding area, with regard to the proposed land use.

10. SITE CHARACTERISTICS

The application area is characterised by a large, south facing property, that overlooks the Knysna lagoon. The Application area is located on the “Kanonkop” plateau and drops steeply down towards the Knysna Estuary. The highest point on the application area is at $\pm 60\text{m}$ above MSL, and the application area drops down towards $\pm 45\text{m}$ above MSL.

The current land use has significantly improved the character, functionality, and contribution of Knysna Erf 3116 within its urban context. Although the property is zoned for single residential purposes, its large size of $8,640\text{m}^2$ makes it underutilised for a single dwelling house. The operation of the guest accommodation has allowed the property to be more effectively used, contributing to the local tourism economy while maintaining the low-density residential character of the surrounding area. The existing buildings on the property are modern and well-maintained, with architectural designs that enhance the visual quality of the area. The landscaping, maintenance, and reinvestment associated with the current land use have ensured that the property remains neat, secure, and visually appealing, thereby improving the overall aesthetic and economic value of the immediate neighbourhood.

The location of the proposed new guest suites has been carefully selected to minimise environmental impact. The area identified for development is already disturbed and contains

existing clearings and openings, thereby significantly reducing the extent of vegetation removal required. The vegetation within the proposed development footprint primarily consists of low-growing, non-indigenous shrub and grass species, with no protected or sensitive plant species present.



FIGURE 12: DISTURBED AREA TO BE DEVELOPED.

To further enhance the environmental quality of the site, the proposal includes the planting of new indigenous trees and landscaping around the new suites, which will assist in integrating the structures into the surrounding environment and improving the overall aesthetic appeal of the property. The indigenous vegetation on the property is largely concentrated along the southern portion, where the natural slope is considerably steeper and unsuitable for construction. This sensitive area will remain undisturbed, ensuring the preservation of the site's natural character and ecological value.

11. EXISTING POLICY FRAMEWORKS

11.1. Western Cape Provincial SDF (2014)

The Western Cape Provincial SDF was approved in 2014 by the Western Cape Parliament and serves as a strategic spatial planning tool that “communicates the provinces spatial planning agenda”.

The PSDF sets out a policy framework within which the Western Cape Government will carry out its spatial planning responsibilities. Each of the three spatial themes contributes to the achievement of the Western Capes's strategic objectives. These policies are categorised into three themes, namely:

- **Resources:** Sustainable use of spatial assets and resources
- **Space Economy:** Opening up opportunities in the Space Economy
- **Settlement:** Developing Integrated and sustainable settlements.

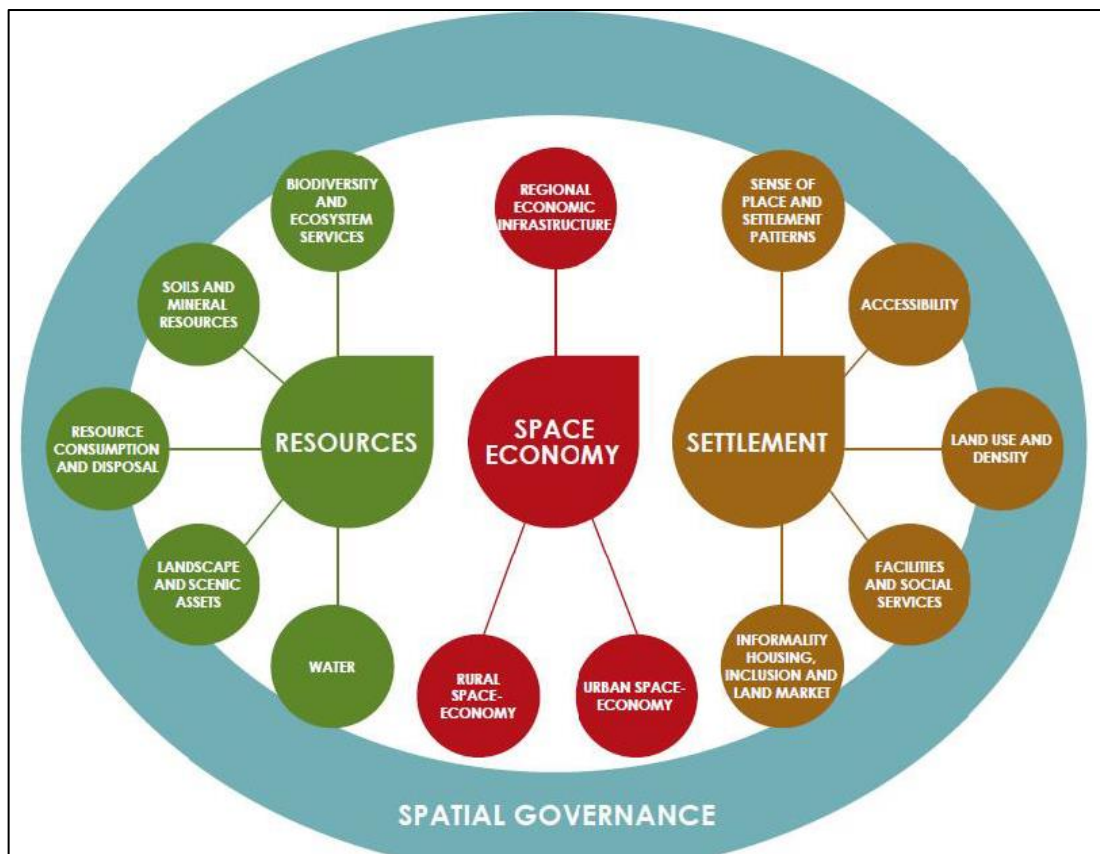


FIGURE 13: POLICIES APPLICABLE TO THE PROPOSED DEVELOPMENT

The proposed development complements the SDF's spatial goals that aim to take the Western Cape on a path towards:

- (i) Greater productivity, competitiveness and opportunities within the spatial economy;
- (ii) More inclusive development in the urban areas; and
- (iii) Strengthening resilience and sustainable development.

However, it is important to note some of the key policies laid down by the Western Cape PSDF have a bearing on this application.

POLICY R4: RECYCLE AND RECOVER WASTE, DELIVER CLEAN SOURCES OF ENERGY TO URBAN CONSUMERS, SHIFT FROM PRIVATE TO PUBLIC TRANSPORT, AND ADAPT TO AND MITIGATE AGAINST CLIMATE CHANGE

Policy Statement	Development Proposal's Response
16. Encourage and support renewable energy generation at scale.	<i>The current land use and proposed land use does and will continue to make use of renewable energy generation, as the property makes use of solar power to augment the energy supply from the municipality.</i>

POLICY S1: PROTECT, MANAGE AND ENHANCE SENSE OF PLACE, CULTURAL AND SCENIC LANDSCAPES

Policy Statement	Development Proposal's Response
2. Promote smart growth ensuring the efficient use of land and infrastructure by containing urban sprawl and prioritising infill, intensification and redevelopment within settlements.	<i>(i) The proposal will facilitate a more efficient use of the land.</i> <i>(ii) The development area is located within the urban edge and is therefore appropriate for urban development.</i> <i>(iii) The proposal seeks to legalise the existing land use on the application site, which was previously permitted under the former zoning but now requires rezoning due to changes in the zoning regulations.</i> <i>(iv) Approving the proposed rezoning will discourage the landowner from pursuing alternative sites outside the urban edge, thereby helping to limit urban sprawl.</i> <i>(v) The application complies with all applicable development parameters, with the exception of one building line on a property. This deviation arises from a structure having been constructed in accordance with the previously less restrictive building line prior to the introduction of the current, more restrictive building line (due to rezoning).</i>
3. Respond to and enhance an economically, socially and spatially meaningful settlement hierarchy that takes into account the role, character and location of settlements in relation to one another while preserving the structural hierarchy of towns, villages, hamlets and farmsteads in relation to historical settlement patterns.	<i>The proposal will be in line with the spatial pattern of the area and the character of the area.</i>

Planning Implication:

*The Western Cape Spatial Development Framework (WCSDF) places strong emphasis on revitalising urban areas and promoting a living environment that is convenient, efficient, and aesthetically appealing to residents. The subject property is located **inside the urban edge** of Knysna, and the proposal will not alter the existing spatial structure of the area, as the land use remains the same, only expanding the existing guest accommodation.*

The proposal aligns with the objectives of the WCSDF by supporting the principles of densification and the sustainable use of existing service infrastructure. The number of suites or bedrooms will increase modestly from seven to nine, incorporating renewable service systems such as rainwater harvesting and solar energy. The proposed development is also consistent with surrounding land uses, as several guest accommodation establishments exist in the immediate area.

By seeking to legalise the existing and proposed land uses and structures through rezoning, the application promotes the efficient and lawful use of land while realising its full potential. The proposal is fully aligned with the strategic objectives of the Western Cape Spatial Development Framework and specifically supports Policies R4 (No. 16) and S1 (No. 2 and 3).

11.2. Draft Garden Route Regional Spatial Development Framework (2019)

The draft Garden Route (Southern Cape) Regional Spatial Development Framework provides development guidelines for the Garden Route District, aligning with the 2014 Provincial Spatial Development Framework. This framework emphasizes three urban priority regions in the Western Cape: the Greater Cape Functional Region, the Greater Saldanha Region, and the Southern Cape Region. The Southern Cape, identified as a provincial leisure and tourism coastal belt, includes key regional centres like Mossel Bay, George, Knysna, and Plettenberg Bay.

The Southern Cape Regional Plan aims to stimulate inter-municipal growth, support integrated sustainable development, and manage urban and rural areas. Its core objectives include fostering regional development opportunities, promoting a regional approach to sustainable development, and improving urban and rural area management practices. The plan outlines specific roles for identified towns to drive coordinated infrastructure investment and contribute to the provincial economy.

The plan addresses various aspects:

- Provides a coherent spatial vision for the Southern Cape functional region, considering environmental, social, and economic factors.
- Offers guidance on rational and predictable infrastructure, economic, and land use planning within the region.
- Takes a regional approach to address environmental management, human settlement provision, economic development, infrastructure, transport, landscape character, sense of place preservation, and heritage.

- Expresses the Provincial Spatial Development Framework at the regional level, elaborating on the role of specific towns in the growth and development of the region.
- Addresses environmental perspectives.
- Considers social perspectives.
- Examines economic perspectives.

Planning Implication:

The Southern Cape Regional Plan is a comprehensive framework focused on promoting sustainable development, managing growth, and leveraging the economic potential of key towns within the region, taking into account environmental, social, and economic considerations.

The proposed land use application does not have a direct link to the strategic objectives set out, and none of the major issues apply to the proposed departures and confirmation of exemption requested. However, the proposed development will not be in contradiction with the Spatial Policy Statements & Guidelines of the Garden Route Regional SDF and the vision for Knysna.

11.3. Knysna Spatial Development Framework (2020)

Knysna Municipality has accepted and implemented a new Spatial Development Framework (June 2020). The purpose of the Knysna SDF is to provide relevant background information regarding the biophysical, economic and social context of Knysna Municipality. The Knysna Municipality Spatial Development Framework serves as a regulatory framework for spatial development within the local municipality.

The Spatial Vision of the municipality is to create a long-term, sustainable land use pattern and building on the Knysna Municipality's integrated development vision to be Inclusive, Innovative and Inspired, the complementary spatial planning vision leading the Knysna MSDF is to:

"...Establish Knysna as an authentic place that works for all of its residents and continues to attract visitors. Build an equitable and inclusive society within a sustainable and resilient ecosystem..."

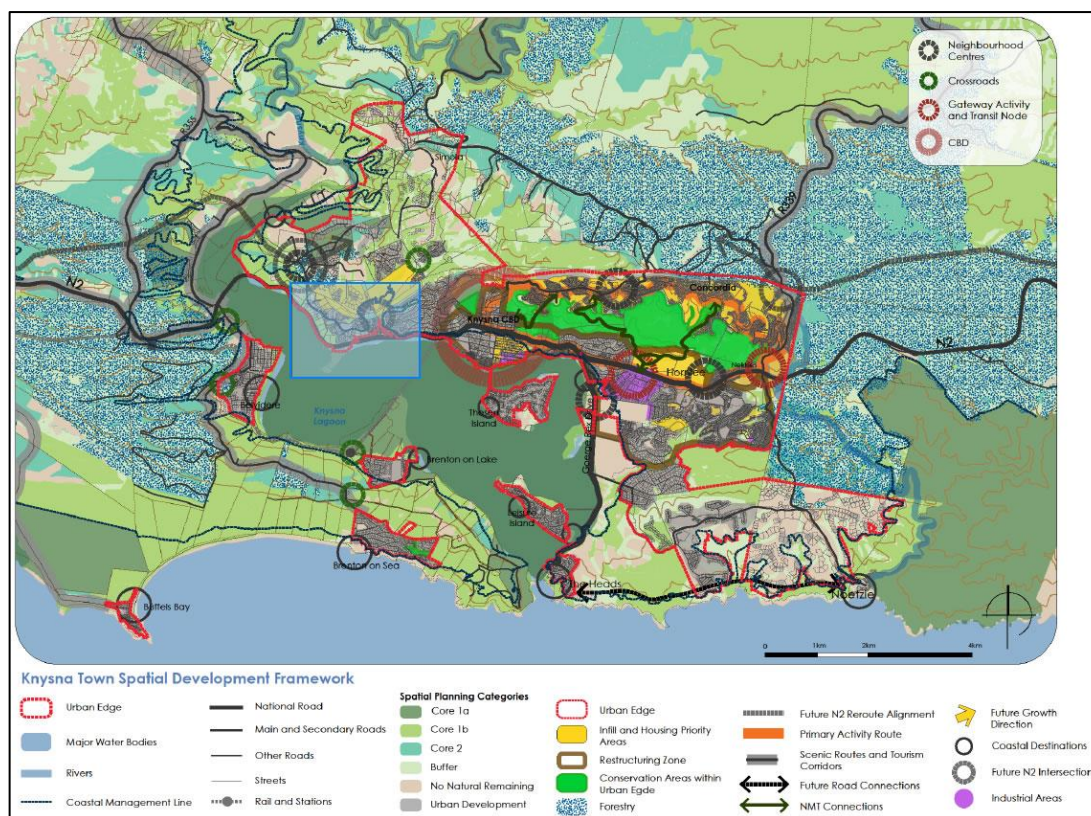


FIGURE 14: SDF MAP 21 - KNYSNA TOWN SPATIAL DEVELOPMENT FRAMEWORK

According to the Knysna Municipality Spatial Development Framework (SDF):

- The application area is situated inside the urban edge of Knysna.
- The application area is situated outside the demarcated CBD of Knysna.
- Earmarked as an existing urban development.

The Spatial policies and policy guidelines guide decision-making on resource allocation, sector planning, land use management and land development programmes. It is important to note some of the key policies of the SDF have a bearing on this application.

Policy B: Manage the growth of urban settlement in Knysna to ensure the optimum and efficient use of existing infrastructure and resources and in turn, secure the Municipality's fiscal sustainability and resilience, while preventing further loss of natural and agricultural assets and functional ecosystem services.

Policy B1 – Hold the urban edge as the development boundary as identified for settlements in the Knysna Municipal Area

Policy Guideline	Application's Response
ii. In the short to medium term, urban growth should be absorbed through densification of low-density suburbs surrounding the Knysna CBD.	<i>Kanonkop is a low-density suburb, and it is clear that the character is changing in line with the spatial policies vision. There are numerous guest accommodations in the surrounding area. The proposed additional</i>

	<i>suites / bedrooms is consistent with this policy through the densification of Kanonkop.</i>
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Planning Implication:

*The subject property is situated **inside the urban edge** of Knysna and is suitable for urban development. The Knysna SDF has a strong emphasis on ensuring that the character and ambience of these areas are protected. The proposed land use remains the same as it is currently, as it is only proposed to construct two new suites / bedrooms to increase the capacity of people that can be accommodated. The proposed rezoning of the application area will be consistent with the spatial pattern of the area and the character of the area. The service supply for Knysna Erf 3116 is adequate. The proposal is consistent with the spatial pattern of the area and is therefore in line with the Knysna SDF.*

11.4. Knysna Integrated Development Plan (2023)

The IDP is a legislative requirement in terms of the Municipal Systems Act, Act 32 of 2000, section 25. The residents, businesses and investors communicate to the municipality their needs using municipal processes from where the municipality develops a long-term vision, and how the municipality plans to achieve it. The local government, Municipal Systems Act, Act 32 of 2000, requires the IDP, the principal strategic planning instrument be the guide for all municipal planning and development within the area of jurisdiction.

The singular strategy of the municipality is guided by section 35 of the MSA, which directs the IDP as 'the principal strategic planning instrument' which guides and informs all planning and development with regard to planning, management and development in the municipality with the aim of-

- Providing household infrastructure and services where it is most needed;
- Create loveable local towns and rural areas;
- Building vibrant and inclusive local economies; and
- Facilitating community empowerment and development

According to the IDP, the Vision for Knysna Municipality is to:

- ✚ Inclusive – The strive towards a more spatially integrated and inclusive municipality
- ✚ Innovative
- ✚ Inspired

The application area is located in **Ward 10** of the Knysna Municipality. The Knysna IDP acknowledges the importance of tourism as an economic driver in the local Knysna Economy. The proposed land use application does not have a direct link to the development priorities for Ward 10, but is consistent with the need for tourism development as identified in the Knysna IDP.

Planning Implication:

The IDP is a municipal planning tool to integrate municipal planning and allocate municipal funding to achieve strategic objectives that will contribute to the overall municipal vision. The landowners currently employ eight permanent staff members with varying skill levels, including a chef, manager, cleaners, and gardeners. In addition to providing stable employment, the applicants have supported staff development by offering training opportunities for employees residing in Knysna. They have also contributed to the well-being of workers' families by assisting with the payment of school fees for their children, demonstrating a continued commitment to social upliftment and community support. This directly adheres to the aim of "Building vibrant and inclusive local economies; and Facilitating community empowerment and development" as mentioned above.

The proposal will provide new and additional economic growth prospects. The proposed land use application does not have a direct link to the strategic objectives set out in the IDP. None of the issues raised by the community regarding Ward 10 is relevant to the proposal. Thus, the proposal is consistent with the Knysna Integrated Development Plan.

SECTION C :**MOTIVATION****12. ASSESSMENT OF APPLICATIONS****12.1. Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013)**

Section 42 of SPLUMA prescribes certain aspects that have to be taken into consideration when deciding on an application. These are:

- (1). Development principles set out in Chapter 2 of SPLUMA
- (2). Protect and promote the sustainable use of agricultural land
- (3). National and provincial government policies the municipal spatial development framework; and take into account: —
 - (i) the public interest;
 - (ii) the constitutional transformation imperatives and the related duties of the State;
 - (iii) the facts and circumstances relevant to the application;
 - (iv) the respective rights and obligations of all those affected;
 - (v) the state and impact of engineering services, social infrastructure and open space requirements; and
 - (vi) any factors that may be prescribed, including timeframes for making decisions.

12.2. Knysna Municipality: Spatial Planning and Land Use Management By-law, 2021

The Knysna Municipality: Spatial Planning and Land Use Management By-law, 2021 as promulgated by G.N 8492 dated 17 September 2021 states in Section 65 the general criteria necessary for considering an application by the municipality.

It must be noted that the application has not undergone the notice phase of the application process and that the information below is the necessary information required by the municipality to process the application. The following criteria must be considered when evaluating the desirability of this land development application:

Assessment Criteria	Reference in Report
The impact of the proposed land development on municipal engineering services .	Par.6
The integrated development plan , including the municipal spatial development framework.	Par.11.4

Assessment Criteria	Reference in Report
The applicable local spatial development frameworks adopted by the Municipality.	Par.11.3
The applicable structure plans .	<i>n/a</i>
The applicable policies of the Municipality that guide decision-making .	Par.12.2
The provincial spatial development framework .	Par.11.1
where applicable, a regional spatial development framework contemplated in section 18 of the Act and provincial regional spatial development framework.	Par.11.2
The policies, principles and the planning and development norms and criteria set by the national and provincial government;	Par.12.1
The matters referred to in Section 42 of the Act; Principles referred to in Chapter VI (6) of the Western Cape Land Use Planning Act ; and	Par.23
applicable provisions of the zoning scheme	Par.5.3
any restrictive condition applicable to the land concerned	<i>n/a</i>

13. CONSISTENCY WITH SPATIAL PLANNING POLICIES

As described in **Par.11** of this report, the proposal is consistent with the relevant spatial planning policies. The proposal is consistent with the relevant spatial planning policies for the following reasons:

- (i) The proposal supports the WCSDF's objectives of revitalising urban areas by enhancing existing guest accommodation within Knysna's urban edge without changing the area's spatial structure. It promotes densification and the efficient use of existing service infrastructure while incorporating sustainable systems such as rainwater harvesting and solar energy.
- (ii) The development aligns with surrounding land uses, where multiple guesthouses already exist, and legalises both existing and proposed uses through rezoning. This ensures the lawful, efficient use of land and supports WCSDF Policies R4 (No. 16) and S1 (No. 2 and 3).
- (iii) The Southern Cape Regional Plan promotes sustainable development and economic growth within key regional towns while considering environmental, social, and economic aspects. Although the proposed application does not directly link to specific strategic objectives, it does not conflict with the plan's guidelines or the vision for Knysna.
- (iv) The proposed development aligns with the Spatial Policy Statements & Guidelines of the Garden Route Regional SDF, ensuring that the proposal supports regional sustainability goals and complements the broader vision for the area.
- (v) The property lies within Knysna's urban edge, an area designated for controlled urban development while preserving its character and ambience. The proposal entails a minor

expansion of existing guest accommodation from seven to nine suites, maintaining the current land use.

- (vi) The proposed rezoning and limited expansion are compatible with the spatial character and development pattern of the area. Adequate municipal services are available, and the proposal is fully consistent with the Knysna SDF.
- (vii) The IDP guides municipal planning and funding allocation to meet strategic objectives that foster inclusive local economies and community development. The landowners currently employ eight permanent workers across various skill levels and provide training and educational support for their families, contributing to social upliftment.
- (viii) The proposal promotes additional economic opportunities and aligns with the IDP's goals of local empowerment and growth. As none of Ward 10's community issues are relevant to the application, it is considered consistent with the Knysna Integrated Development Plan.

14. CONSISTENCY WITH THE SURROUNDING AREA

The proposed rezoning and permanent departure are both consistent with the established character of the surrounding area. The rezoning application seeks to formalise the existing land use, which was previously permitted but became non-compliant in 2009, as discussed in **Par 9 & 14**. The existing and proposed land use remains compatible with the surrounding area, which features numerous guest accommodation establishments within a 400 m radius. This demonstrates a well-established precedent for a mixed residential and tourism-oriented character, where guest lodges and similar uses coexist harmoniously with residential properties.

The proposed departure is likewise consistent with the area's character. Many surrounding properties remain zoned "Single Residential Zone I (SR1)" and are subject to 2 m building lines. The need for a departure arises solely from the change in zoning, which introduced a more restrictive building line. The existing structure was lawfully constructed in accordance with the 2m building line applicable under the previous zoning, and no new development within the building lines is proposed.

As the application merely seeks to regularise and modestly expand the existing land use without altering the property's current function or physical form, the proposed rezoning and permanent departure are considered to be entirely in keeping with the prevailing character of the area.

15. NO IMPACT ON EXISTING RIGHTS

The only structure situated within the building lines of the proposed rezoning application area is the existing bedroom extension and deck, which was originally constructed in full compliance with the development parameters of the current zoning. This structure only becomes non-compliant as a result of the proposed rezoning, and no new buildings are proposed within the building lines of the property.

Given the established character of the area, it is our considered opinion that the proposed development will not negatively impact on the existing land use rights of any surrounding property

owners. The existing use and operations on the site will remain unchanged, with the only modification being the addition of two suites or bedrooms to accommodate more guests. These additions comply fully with the development parameters set out in the Knysna Zoning Scheme By-law (2020) and do not encroach upon any neighbouring property boundaries or rights. The day-to-day operation of the guest lodge will continue in the same manner as the current guest accommodation.

Accordingly, the proposed rezoning and permanent departure will not inhibit surrounding property owners from exercising their lawful land use rights. The proposal therefore has no adverse impact on any existing land use rights within the area.

16. NO IMPACT ON MUNICIPAL SERVICES

Par.6 of this motivation report addresses the services provision of the proposed development. It is only proposed to add two additional suits / bedroom, which will have a minor impact on the service provisions. With the addition of the proposed suits / bedrooms, the landowner will also add to the augmentation that is currently being provided on the property. The landowner will add to the existing off-grid service provisions to ensure that the impact on municipal services remain minimal.

17. ACCESSIBILITY

As described in **Par.4.3** of this motivation report, Knysna Erf 3116 will continue to be accessed by vehicles directly from Cuthbert Street, which connects to Metelerkamp Street, leading to Welbedacht Lane, and ultimately linking to the N2 National Road.

The application area is served by a 6 m-wide combined entrance and exit, which complies with the development parameters outlined in the Knysna Municipality Zoning Scheme By-law (2020). The anticipated increase in traffic will be minimal, as only one additional parking space is required per new suite / bedroom. This equates to a maximum of two additional vehicles on the access roads, representing a very minor increase in traffic volumes.

The proposed land use will remain consistent with the current use, meaning that the overall traffic demand will not change significantly, aside from the limited increase associated with the additional suites / bedrooms.

18. NEED FOR PERMANENT DEPARTURE

The property has been used as a guest house for several years, and the landowner envisages expanding the guest house with two additional suites / bedrooms. Before 2009, the Knysna Municipality had a B&B Bylaw in place, that allowed for tourist accommodation establishments as a primary right on single residential zoned properties, up to a maximum of 5x guest rooms / 10 guests. During 2020, when the new Knysna Zoning Scheme Bylaw came into operation, a guest house was allowed as a consent use on a single residential property, but limited to only 12 persons, and therefore a rezoning is required to allow a guest lodge to allow the proposed development.

The proposal is that Kanonkop House, with the new, additional guest suites, will have a manager's unit and 9 guest rooms.

There are six existing structures that are situated on the property. These structures include the existing guard house, existing garage, bedrooms extension & deck, existing laundry house, existing store room, existing dwelling and a two-story building with a basement to the east of the dwelling.



FIGURE 15: EXISTING STRUCTURE ON 2M BUILDING LINE

The existing bedrooms extension & deck was constructed on the 2m building line as prescribed for Single Residential Zone I properties. With the proposed rezoning General Residential Zone IV, the building line will become more restrictive (2m to 4,5m). Therefore, as the structure is existing, a departure will be required to allow the structure within the new, more restrictive 4,5m building line. No new structures are proposed within the building line of the property.

19. NO VISUAL IMPACT

The proposed development will have no adverse visual impact on the surrounding area. The new suites are situated on the centre of the property, on the opposite side of the hill from Cuthbert Street. Due to the property's topography, which rises from Cuthbert Street before sloping downward, the proposed structures will not be visible from the street frontage. Similarly, the steep slope adjacent to the N2 National Road, combined with the dense vegetation along this boundary, effectively screens the development from motorists' view. As a result, the new structures will not be visible from the N2, and the proposal will have no visual impact on passing motorists.

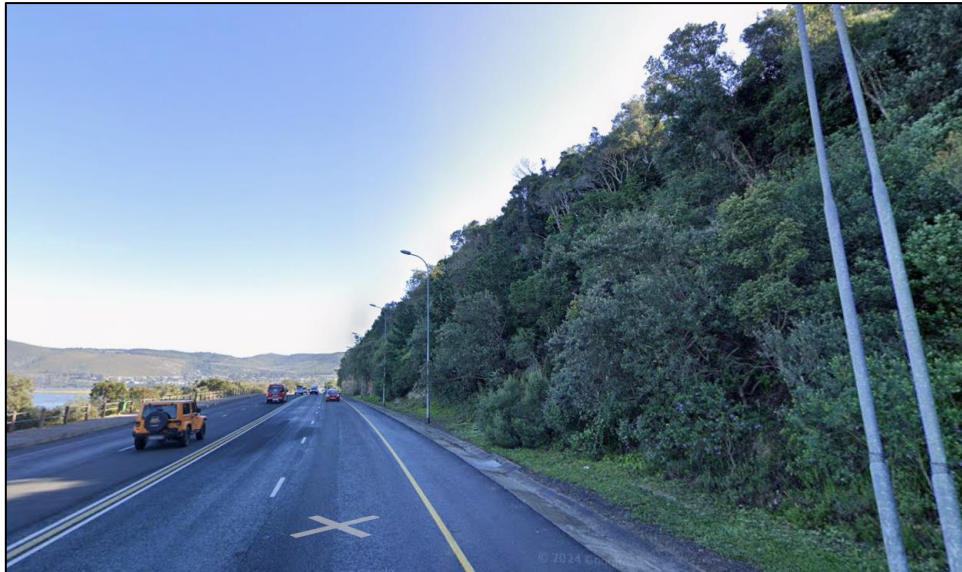


FIGURE 16: NO VISUAL IMPACT FROM THE N2 NATIONAL ROAD.



FIGURE 17: VIEW FROM THE EXISTING STRUCTURES TO THE N2 NATIONAL ROAD.

As seen in Figure 17, the N2 National Road is not visible from the existing structures due to the slope and vegetation.

The proposed buildings have been designed to blend harmoniously with the surrounding environment, using natural materials and muted colours that complement the existing landscape and vegetation. In addition, new indigenous trees will be planted around the new suites to further soften the visual appearance of the buildings and assist in their integration into the natural setting. From viewpoints such as Thesen Island, the new structures will be largely obscured by the existing vegetation and topography, as illustrated in the 3D renderings below.

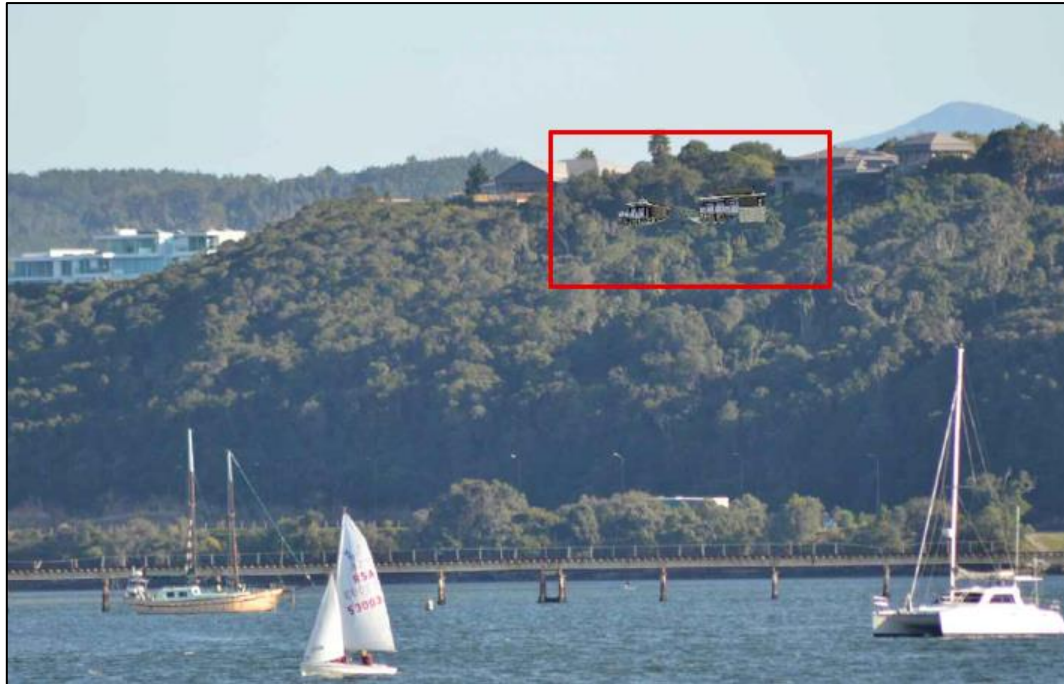


FIGURE 18: 3D RENDERING OF PROPOSED STRUCTURES FROM THESENS ISLAND

Furthermore, the proposed suites are located on a lower portion of the slope than neighbouring dwellings, ensuring that the development will not obstruct or detract from any existing views enjoyed by surrounding properties. Overall, the proposal is considered to have a negligible visual impact and is compatible with the existing landscape character of the area.

20. NO ENVIRONMENTAL IMPACT

The proposed development will have no significant environmental impact, as it is situated within an already disturbed portion of the property that contains low-growing, non-indigenous plant species and no sensitive or protected vegetation. The existing buildings and the landscaped gardens surrounding them have already established a managed environment, and the addition of the two new units, measuring 87.3 m² and 92.5 m² respectively, will not extend development into any undisturbed or ecologically sensitive areas. Importantly, the indigenous forest located on the steeper southern section of the property will remain untouched, ensuring the preservation of the natural vegetation and ecological character of the site. The placement of the new structures avoids all indigenous plant communities, and the proposal includes further landscaping and tree planting to enhance the natural setting. Additionally, the extensive rainwater harvesting system on the property reduces stormwater runoff, thereby limiting potential erosion and contributing to sustainable water management. Overall, the development has been designed to ensure that the environmental integrity of the property is fully maintained.

21. IMPACT ON THE KNYSNA LOCAL ECONOMY

The current guest accommodation establishment on Knysna Erf 3116 provides eight permanent employment opportunities, including a manager, chef, cleaners, and gardeners. With the proposed rezoning to "Guest Lodge" and the addition of two new en-suite guest rooms, further employment

opportunities will be created, as the applicants intend to appoint a private security guard and at least one additional cleaner.

In addition to salaries, the landowner provides in-house training for chefs, cleaners and management staff, thereby upskilling existing staff. The applicant also provides financial assistance to staff by covering school fees for their children, thereby supporting education and contributing to the long-term development of Knysna's future workforce.

The operation of the current guest accommodation sources all produce and consumables locally, with the establishment spending approximately R100 000 per month in Knysna. This figure is expected to increase with the addition of the two new en-suite guest rooms. This local spending excludes additional expenditures such as staff events, which further contribute to the local economy.

Guests typically stay for around three days. Over the past two years, each of the existing seven rooms has been occupied for an average of 204 nights per year, equating to approximately 1 428 booked nights annually. The proposed two additional suites are expected to add about 408 booked nights per year. These guests, primarily international visitors, spend foreign currency in Knysna through restaurants, shops, and local attractions, thereby supporting and stimulating the local tourism economy.

22. DESIRABILITY

The concept "desirability" in the land use planning context may be defined as the degree of acceptability of a proposed development on land units concerned. This section expresses the desirability of the proposed rezoning, taken in conjunction with the development principles and criteria set out through the statutory planning framework, as well as the degree to which this proposal may be considered within the context of broader public interest. It is our view that the initial investigation into the desirability of the proposal reveals no obvious negative impacts.

The proposed development is considered desirable as it is not in conflict with the spatial development policies, does not negatively impact the provision of services or any surrounding landowners' rights. Furthermore, the approval of the application will not have a negative impact on the character of the area, accessibility and functionality of the area, nor will it negatively impact any member of the public.

The following key considerations are considered to determine the desirability of the proposed land use:

Elements for Consideration	Key Questions to Ask	Proposal's Desirability
Economic impact	Positive or Negative impact on neighbourhood / settlement?	Positive economic impact (employing workers and educating workers and their families). No impact on surrounding property owners or their rights.

Elements for Consideration	Key Questions to Ask	Proposal's Desirability
Social impact	Greater social justice, equity of access to opportunity	- The surrounding property owners will not be negatively affected by the proposal, and the proposal complies with all the development parameters. - The proposal will also allow for additional opportunities in form of accommodation. - The operation of the guest accommodation has provided opportunities for workers to receive training and develop additional skills in the hospitality sector. The landowner has also supported the families of employees by assisting with school fees and access to education, thereby contributing to the development of a skilled workforce, both for current employees and for those who will enter the workforce in the future. See Par. 15, 16, 19 & 21
Scale of capital investment	> capital investment - > positive impact	- Landowner's investment to expand on the current land use. - More worker that are trained at the cost of the landowner. - Additional cost for cleaning products and food bought in the local economy.
Compatibility with surrounding land uses		- See Par.9 & Par.14
Impact on external engineering services	How much must the developer contribute to municipal costs incurred?	Insignificant services impacts with 55000 litres of stored rain water and renewable energy solutions. See Par.6.
Impact on safety, health & well-being of the surrounding community		- See Par.15, Par.16, Par.19 & Par.21 - No visual impact
Impact on heritage		- No heritage impacts - No heritage value
Impact on the biophysical environment	Are there negative impacts? Are they adequately mitigated?	- Within urban edge. - No NEMA listed activities triggered. - The positioning of the two new guest suites takes into consideration the biophysical

Elements for Consideration	Key Questions to Ask	Proposal's Desirability
		<i>characteristics of the site by locating the units in disturbed areas between the trees.</i>
Traffic impacts, parking access, other transport considerations	Support for densification & functional public transport system?	▪ <i>Ample parking is provided. See Par.4.3 & Par.17</i> ▪ <i>Ample and safe access to the application area.</i>
Impact on quality of life (incl. views, sunlight, privacy, visual impact, character)		▪ <i>No negative impact on the quality of life.</i> ▪ <i>No views will be obscured.</i> ▪ <i>Fits within the character of the area.</i>
Timing – need to densify or protect urban edges	The best option for the site at this point?	▪ <i>Within urban edge.</i> ▪ <i>Complies with all the development parameters of the zoning scheme, except one building line departure.</i> ▪ <i>Full utilisation of the site and easily able to accommodate the additional suits / bedrooms within the prescribed development parameters as per the zoning scheme.</i> ▪ <i>The acceptable scale of densification.</i>
Cumulative impacts	Unacceptable cumulative impacts?	▪ <i>Only positive impacts. No impact on any of the surrounding property owners or the Municipality.</i>
Opportunity costs	Any unacceptable opportunity costs?	▪ <i>Private investment.</i> ▪ <i>No municipal funding is required.</i>
Alignment with SDF's		▪ <i>Refer to Par.11 & Par.13</i>

Note: LUPA (Land Use Planning Act) does not refer to a lack of desirability, nor does it require there to be a positive advantage (i.e. the absence of a positive advantage should not automatically lead to a decision to refuse).

From the table above, it is clear that the proposed rezoning and permanent departure is desirable.

23. WESTERN CAPE LAND USE PLANNING ACT, 2014 (ACT 3 OF 2014)

The purpose of this Provincial legislation is to consolidate legislation in the Province pertaining to provincial planning, regional planning and development, urban and rural development, regulation, support and monitoring of municipal planning and regulation of public places and municipal roads arising from subdivisions; to make provision for provincial spatial development frameworks; to provide for minimum standards for, and the efficient coordination of, spatial development frameworks; to provide for minimum norms and standards for effective municipal development

management; to regulate provincial development management; to regulate the effect of land development on agriculture; to provide for land use planning principles; to repeal certain old-order laws, and to provide for matters incidental thereto.

Section 59 of this Act prescribes the Land Use Planning Principles that apply to all land development in the province. These are summarised in the tables below. The tables below aim to summarise how the proposed development complies with these principles.

23.1. Spatial Justice

CRITERIA	COMPLIANCE	PLANNING IMPLICATION
Past spatial and other development imbalances must be redressed through improved access to and use of land.	COMPLY	<i>The Knysna B&B Bylaw was repealed during 2009, without notifying any tourist accommodation establishments of the repeal of the bylaw. Therefore, as the landowners did not know the land use was illegal, an application for a rezoning is required.</i>
Spatial development frameworks and policies at all spheres of government must address the inclusion of persons and areas that were previously excluded, with an emphasis on informal settlements, former homeland areas and areas characterised by widespread poverty and deprivation.	N/A	▪ <i>This policy is not applicable to the application area.</i> ▪ <i>Not a Spatial Development Framework or Policy.</i>
Spatial planning mechanisms, including land use schemes, must incorporate provisions that enable redress in access to land by disadvantaged communities and persons.	N/A	<i>This policy is not applicable to the application area.</i>
Land use management systems should include all areas of a municipality and specifically include provisions that are flexible and appropriate for the management of disadvantaged areas and informal settlements.	N/A	<i>This policy is not applicable to the application area.</i>
Land development procedures must include provisions that accommodate access to, and facilitation of, the security of tenure and the incremental upgrading of informal areas.	Applicable to Knysna Municipality	<i>The municipality must process this application within the prescribed guidelines of the Knysna Municipality: Spatial Planning and Land Use Management By-law (2021).</i>

CRITERIA	COMPLIANCE	PLANNING IMPLICATION
A competent authority contemplated in this Act or other relevant authority considering an application before it, may not be impeded or restricted in the exercise of its discretion solely on the ground that the value of land or property will be affected by the outcome of the application.	Applicable to Knysna Municipality	<i>The municipality must process this application within the prescribed guidelines of the Knysna Municipality: Spatial Planning and Land Use Management By-law (2021).</i>
The right of owners to develop land in accordance with current use rights should be recognised.	COMPLY	▪ <i>The owner seeks to expand on the existing land use in order to increase financial feasibility, as the current land use is only enough to break even. Therefore, to allow the business to thrive, additional units will be required, and therefore, a rezoning as well.</i>

23.2. Spatial Sustainability

CRITERIA	COMPLIANCE	PLANNING IMPLICATION
Promote land development that is spatially compact, resource-frugal and within the fiscal, institutional and administrative means of the relevant competent authority in terms of this Act or other relevant authority.	COMPLY	▪ <i>The proposal is resource frugal, as all activities will fully utilise the existing service supply, and water augmentation through rainwater catchment and electrical augmentation through solar is provided on the property.</i> ▪ <i>The proposed development is within the urban edge of Knysna and within an established urban environment.</i>
Ensure that special consideration is given to the protection of prime, unique and high potential agricultural land.	N/A	<i>Not Agricultural land</i>
Uphold consistency of land use measures in accordance with environmental management instruments.	COMPLY	▪ <i>The application area is located within an existing urban area and does not trigger any environmental listed activities in terms of the National Environmental Management Act (1998).</i> ▪ <i>The proposed guest rooms are situated within the existing garden area of the property. No natural vegetation or sensitive habitats will be disturbed. This ensures that the development remains consistent with the Environmental</i>

CRITERIA	COMPLIANCE	PLANNING IMPLICATION
		<i>management objectives of limiting disturbance of the natural environment.</i> ▪ <i>By formalising and slightly intensifying an existing urban use, the proposal supports sustainable land use patterns that are compact, accessible, and environmentally responsible.</i>
Promote and stimulate the effective and equitable functioning of land markets.	COMPLY	▪ <i>The proposed development is consistent with the character of the surrounding area.</i> ▪ <i>It will not negatively impact the value of its surrounding properties.</i> ▪ <i>By legalising the guest house through a formal land use process, the property becomes fully compliant with the municipal land use scheme. This enhances the legal certainty of property rights, which is essential for a transparent and well-functioning land market. Buyers, investors, and financial institutions can engage with the property with confidence.</i> ▪ <i>The proposal adds economic value to an existing urban property by allowing low-impact tourism accommodation within a serviced urban area. This demonstrates how urban land can be optimally utilised to support small-scale business ventures, increasing the overall productivity and market value of land in the area.</i> ▪ <i>The ability to accommodate both residential and guest house uses on appropriately zoned urban land broadens the range of land uses available in the local market. This promotes a more equitable distribution of opportunities, especially for small business operators or entrepreneurs seeking to enter the hospitality sector.</i>
Consider all current and future costs to all parties for the provision of infrastructure and social services in land developments.	COMPLY	▪ <i>The existing infrastructure is adequate, and no upgrade is required. Augmentations for water and electricity has been incorporated into the existing and proposed land use. See Par.6</i>

CRITERIA	COMPLIANCE	PLANNING IMPLICATION
		The proposal will not result in any additional costs for Knysna Municipality, regarding infrastructure services.
Promote land development in locations that are sustainable and limit urban sprawl.	COMPLY	The proposed development is within an existing residential area. No urban sprawl will be created because of this land use application.
Result in communities that are viable.	COMPLY	- The proposal will not detract from the existing character of the area and result in a viable residential community. - See Par.9 & Par.14
Strive to ensure that the basic needs of all citizens are met in an affordable way.	N/A	This principle is not applicable to the applicant or this development.
The sustained protection of the environment should be ensured.	COMPLY	- In line with all Environmental policy documents and legislation. - The application area is located within the existing urban area of Knysna and within the existing urban fabric.

23.3. Spatial Efficiency

CRITERIA	COMPLIANCE	PLANNING IMPLICATION
Land development optimises the use of existing resources and infrastructure.	COMPLY	Application Area is already connected to the application area, and has additional water and electrical augmentation through the use of rainwater catchment and solar power. See Par.6
Integrated cities and towns should be developed.	COMPLY	- The proposal introduces a complementary land use (guest accommodation) within a predominantly residential area. This mix of uses supports functional integration—allowing residents, visitors, and small business activity to coexist in the same neighbourhood, which aligns with SPLUMA's principle of creating spatially integrated towns and settlements. - The guest lodge attracts visitors who make use of local shops, services, and amenities, thereby strengthening the economic and social linkages within the town. This helps integrate different

CRITERIA	COMPLIANCE	PLANNING IMPLICATION
		parts of the urban area through shared economic activity and community interaction. The guest house use provides opportunities for small-scale entrepreneurship and job creation, especially in the hospitality and service sectors. This contributes to social and economic inclusion, which are core aspects of integrated urban development.
Policy, administrative practice and legislation should promote speedy land development.	Applicable to Knysna Municipality	The municipality should process this application within the prescribed time frames of the Knysna Municipality: Spatial Planning and Land Use Management By-law (2021).

23.4. Spatial Resilience

CRITERIA	COMPLIANCE	PLANNING IMPLICATION
Flexibility in spatial plans, policies and land use management systems are accommodated to ensure sustainable livelihoods in communities most likely to suffer the impacts of economic and environmental shocks	COMPLY	- The proposal is consistent with the various applicable spatial plans, policies and land use management systems. - It will have no negative impact on the livelihood of the community. - The proposed application complies with the requirements of the Knysna Municipality: Spatial Planning and Land Use Management By-law (2021).

23.5. Good Administration

CRITERIA	COMPLIANCE	PLANNING IMPLICATION
All spheres of government should ensure an integrated approach to land use planning.	Applicable to Knysna Municipality	- This principle has no direct bearing on the application; however, the Knysna Municipality is obligated to consider the application fairly and within the timeframes provided in terms of the municipal planning bylaw. - What is however important is that all decision making is aligned with sound policies based on nation, provincial and local development policies.
All government departments must provide their sector inputs and comply with any other statutory requirements during the preparation or amendment of spatial development frameworks.		
The requirements of any law relating to land development and land use must be met timeously.		

CRITERIA	COMPLIANCE	PLANNING IMPLICATION
The preparation and amendment of spatial plans, policy, zoning schemes and procedures for land development and land use applications, should include transparent processes of public participation that afford all parties the opportunity to provide inputs on matters affecting them.		
The legislation, procedures and administrative practice relating to land development should be clear, promote predictability, trust and acceptance in order to inform and empower members of the public.		
A spatial development framework, zoning scheme or policy should be developed in phases and each phase in the development thereof should include consultation with the public and relevant organs of state and should be endorsed by the relevant competent authority.		
Decision-making procedures should be designed to minimise negative financial, social, economic or environmental impacts.		
Development application procedures should be efficient and streamlined and timeframes should be adhered to by all parties.		
Decision-making in all spheres of government should be guided by and give effect to statutory land use planning systems.		

24. CONCLUSION

In light of this motivation, and the information contained in the foregoing report, it is clear that the application for:

- (i) The rezoning of Knysna Erf 3116 from 'Single Residential Zone I (SRI)' to 'General Residential Zone IV (GRIV)' in terms of Section 15(2)(a) of the Knysna Spatial Planning and Land Use Management Bylaw (2021), to allow a guest lodge with 9x guest rooms and a Manager's Unit.
- (ii) A permanent departure in terms of Section 15(2)(b) of the Knysna Spatial Planning and Land Use Management Bylaw (2021) for the relaxation of the northern side building line from 4,5m to 2m to allow for the existing buildings in a new zoning category.

Meets the criteria as set out in The Spatial Planning and Land Use Management Act (SPLUMA) and the Knysna Municipality: Spatial Planning and Land Use Management By-law (2021), is desirable and it is therefore recommended that the application be supported by the relevant authorities and approved by Knysna Municipality.

Marika Vreken Urban and Environmental Planners
November 2025

