



MOTIVATION REPORT

Application in terms of the provisions of sections 15(2)(a) and (o) of the Knysna Municipality Spatial Planning and Land Use Management By-Law, 2021, for the amendment of land use rights by way of re-zoning and consent use.

PROPERTY DESCRIPTION

Erf 4162, Knysna, Knysna Local Municipality

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1. INTRODUCTION

1.1 Background

The owner of the property is an entrepreneur who invest in property with the aim of adding value and creating opportunities. In this case, she has owned the property for many years and wish to eventually develop it now as the timing seems right. Her intension is to create a retirement resort, her information and self-research indicates a demand for such type of facilities within the Cape region.

1.2 Reason for the application

In terms of section 15(1) of the Knysna Municipality Spatial Planning and Land Use Management By Law, 2021 no person may commence, continue, or cause the commencement or continuation of, land development, other than the subdivision or consolidation of land referred to in section 24, without the approval of the municipality in terms of sub-section (2).

The intended land use will be in contradiction with the current land use rights, in order to legally use the property for purposes as intended, permission needs to be obtained from the local authority for the change of land use rights by way of rezoning and consent use.

Smart City Town & Regional Planners was appointed to apply to the relevant authorities to obtain such land use rights.

2. PROPERTY INFORMATION

2.1 Legal Information

Description	Erf 4162 Knysna	
Size (m²)	5759m ²	
Ownership	Magda Zakrzewski	
Title deed	T11758/2004	
Bond	No bond	
Restrictive title conditions	None	
Servitudes	Refer to title deed condition C. (a) which describes a joint right of way servitude as per line "BCD" on SG Diagram No. 614/1973 of which a copy is included in the application documentation.	
Area of jurisdiction	Knysna Municipality	
Applicable Land Use Scheme	Knysna Municipality: Zoning Scheme By Law, 2020	
Existing development controls	Zoning	"Undetermined Zone"
	Primary uses	Existing buildings
	Consent use granted	None
	Height	Not applicable
	Coverage	Not applicable
	FAR	Not applicable
	Density	Not applicable
	Building line	Not applicable
Existing development	Dwelling house structure	

Table 1: Property Legal Information

2.2 Locality

Regional Context-

The subject property is located within the municipal jurisdiction of Knysna, a coastal town situated along the southern coastline of the Garden Route. Knysna lies approximately 55 km east of George and about 33 km west of Plettenberg Bay. These towns are connected by the major regional transport corridor, the N2 National Route, which functions as the principal east–west mobility route along the southern Cape coast.

Within this regional framework, the subject property is located approximately 4.3 km south-east of the Knysna central business district (CBD), placing it within convenient travelling distance of the town's primary commercial, administrative, and service facilities. The N2 corridor provides strategic regional accessibility to the property and connects Knysna to broader provincial and national economic networks.

Local Context - At the local scale, the property is situated within the greater Knysna urban area and falls within an established residential environment to the south-east of the CBD. Vehicular access to the property is obtained via a registered right-of-way servitude extending from Barracuda Street, which forms part of the local residential road network serving the surrounding neighbourhood.

The immediate area is characterised predominantly by low-density residential development, with associated neighbourhood infrastructure and community facilities typical of suburban areas within Knysna. Local movement is primarily accommodated by the surrounding residential street network which connects to collector routes linking the neighbourhood to the broader urban area and ultimately to the N2 corridor and the Knysna CBD.

The site's location within an established residential context, together with its proximity to local roads and municipal services, supports its integration into the surrounding urban fabric while maintaining reasonable access to the town's commercial and social amenities.

A locality plan indicating the position of the property in relation to the surrounding area is included in the application documentation.

2.3 Site Characteristics

The subject property, measuring approximately 5 759m² in extent, is situated within the jurisdiction of the Knysna Local Municipality and is characterised by a prominent sloping topography typical of the greater Knysna area.

The site slopes from the north-western boundary towards the south and south-eastern portions, with a more pronounced gradient occurring in the northern and north-western sections of the property. These upper portions of the site are relatively steep and present constraints in terms of development potential. In contrast, the southern portion of the property exhibits a gentler slope, making it more suitable and practical for development purposes.

The property enjoys a south-facing orientation, offering attractive views over adjacent open spaces and the broader natural landscape to the south. This aspect enhances the environmental and aesthetic value of the site and is a key informant in the placement of the proposed development footprint.

From a development perspective, the buildable area is logically concentrated within the southern portion of the site, where the terrain is more favourable and can accommodate development with reduced earthworks and environmental disturbance. The steeper northern areas are more appropriately retained as open space or low-impact areas, thereby responding sensitively to the natural topography.

Overall, the site presents a distinct topographical character, with varying gradients that inform a site-responsive development approach, ensuring that the proposed land use is aligned with the physical constraints and opportunities presented by the property.

2.4 Character of the area and surrounding land uses.

The subject property is located within the south-eastern urban area of Knysna, a coastal town situated along the Garden Route.

➤ **Character of area**

The subject area displays a predominantly low-density residential and semi-rural character. The landscape is characterised by relatively large residential properties interspersed with natural vegetation typical of the Garden Route coastal environment, including wooded areas and patches of indigenous vegetation. Development in the area appears scattered and low intensity, with dwellings generally set back from roads and often positioned on larger erven.

The terrain is characterised by gentle hills and valleys, with vegetation contributing to a visually green and semi-natural environment, which is typical of the outskirts of Knysna where urban development transitions into more rural or lifestyle-type residential areas.

➤ **Surrounding Land Uses**

Land uses in the immediate vicinity of the property primarily include:

- Single residential dwellings located on individual erven within the surrounding neighbourhood.
- Vacant or partially vegetated land parcels, indicating areas that remain undeveloped or retain natural vegetation.
- Access roads and local residential streets, including Barracuda Street from which access to the property is obtained via a right-of-way servitude.
- Natural vegetation and open spaces, which contribute to the semi-rural character of the locality.

Overall, the surrounding environment can be described as a low-density residential area with strong natural landscape elements, where built form is relatively dispersed and integrated with the surrounding vegetation. This pattern of development is consistent with residential neighbourhoods located on the periphery of the Knysna urban area, where suburban residential uses gradually transition into more rural or natural land uses.

3. APPLICATION PROCESS

3.1 Pre application consultation

A pre consultation application was held on 11 September 2025 via MS Teams & Planning Boardroom. It was concluded that the proposed development of a retirement resort with 36 units can be considered and supported on the subject property subject to certain conditions and successful submission and consideration of an application for change of land use rights.

Because of the type of development intended and units proposed, it was advised that the most appropriate zoning will be “General Residential Zone III” which includes flats because each unit will not have a ground floor as per the existing proposal. And secondly to apply for a consent to include the use of the property for a retirement resort.

The Minutes of the meeting held is included in the application documentation.

At a later date an enquiry was submitted to the Knysna Municipality informing them of the intension to lower the number of units of 36 to only 20 units. The reason for this change was per information provided by a Traffic Engineer that the width of the access road being 6,3m wide, per TMH-16 (Traffic Impact Study Manual) standards can only accommodate no more than 20 units without being broadened to 7m.

Based on this information it was then further requested that a traffic impact study not be submitted with the application documentation and accepted per e mail response dated 10 February 2026 by Mr Shaun Madumbo.

3.2 Application information

- Application is firstly made in terms of the provisions of section 15(2)(a) of the Knysna Municipality Spatial Planning and Land Use Management By-Law, 2021 for the amendment of land use rights in terms of the Knysna Zoning Scheme By law, 2020 from existing zoning “Undetermined Zone” to “General Residential Zone III” (GR III) for purposes of flats.

The following extract from the Land Use Scheme, Schedule 1, Use Zone Tables are provided:

“The objective of this zone is to promote higher density residential development. The dominant use within this zone must be residential, but limited mixed use development is possible with the Municipality’s consent. This zone has preferred location requirements, including proximity to transport and amenities, and should not be randomly located without due consideration of the availability of open space and community facilities.”

The following extract from the Land Use Scheme, Schedule 2, Land Use Descriptions And Development Parameters is provided:

“flats”

Land use description: “flats” means a building containing three or more dwelling units of which at least one does not have a ground floor, together with such outbuildings, open space and private roads as are ordinarily associated with flats.

Development parameters:

(a) Coverage

The maximum coverage is 60%.

(b) Floor factor

The floor factor may not exceed 1.

(c) Height

(i) The highest point of a building may not exceed 12 metres;

(ii) The general provisions regarding earth banks and retaining structures in this By-law apply.

(d) Building lines

(i) The street building line is at least 5 metres.

(ii) Side and rear building lines are at least 4,5 metres.

(iii) The general building line encroachments in this By-law apply.

(e) Parking and access

Parking and access must be provided in accordance with this By-law.

(f) Screening

The Municipality may require screening in accordance with this By-law.

(g) Site development plan

The Municipality may require a site development plan to be submitted for its approval.

(h) Institution, place of instruction and place of assembly

The development parameters that apply to “institution”, “place of instruction” and “place of assembly” apply to this use; provided that where the institution, place of instruction or place of assembly is situated within a building which is also used for flats or a boarding house, then the coverage, height and building line requirements for the flats or boarding house apply.

(i) Open space

(i) Every block of flats must have access on the land unit to an outdoor living area, including private or communal open space, but excludes roads, service yards and parking areas.

(ii) An outdoor living area of at least 10% of the net erf area must be provided and the outdoor living area(s) must be of reasonable proportions and location to allow for leisure or recreational use by residents and may include open courtyards within the complex.

(j) Service yard

A service yard must be provided on the land unit in accordance with this By-law.

(k) Refuse room

A refuse room must be provided on the land unit in accordance with this By-law.

(l) Flats as a consent use in a group housing scheme

The following conditions apply to flats as a consent use right in this zone:

(i) the flats must form an integrated part of a group housing site and must comply with the development parameters for “group housing”;

(ii) the total floor space of flats may not exceed 40% of the total floor space of all buildings on the group housing site; and

(iii) the open space requirement for dwelling units in a group housing site applies.

- Secondly application is made in terms of the provisions of section 15(2)(o) of the Knysna Municipality Spatial Planning and Land Use Management By-Law, 2021 for the consent to use the property for a retirement resort.

The following extract from the Land Use Scheme, Schedule 2, Land Use Descriptions And Development Parameters is provided:

“Retirement resort”

Land use description: “retirement resort” means, flats, group housing or town housing that conforms to the following additional conditions:

- (a) each dwelling unit must be occupied by a retiree or pensioner or by a family of which at least one member is a retiree or pensioner; and
- (b) a full spectrum of frail care and other facilities reasonably associated with a retirement resort may be provided at the retirement resort.

Development parameters:

Development parameters applicable to the primary use apply.

4. MOTIVATION

4.1 Proposed development

The proposed development entails the establishment of a retirement resort comprising approximately 20 residential units on the subject property located within the south-eastern urban area of Knysna. The development is envisioned as a low-density, lifestyle-oriented retirement environment, designed to integrate with the tranquil and predominantly residential character of the surrounding area.

The residential component will consist of flats ranging in size from approximately 80 m² to 120 m², providing comfortable and manageable living spaces for elderly residents. The units will be designed with a strong emphasis on accessibility and universal design principles, including features such as wheelchair-friendly access, barrier-free internal layouts, and safe pedestrian movement routes to accommodate residents with varying mobility needs. Circulation areas within the development will therefore be designed to allow easy and convenient movement for residents, including those making use of wheelchairs or mobility aids.

The subject property exhibits a natural slope from the north-west toward the south-east. The proposed development will respond sensitively to this topographical condition by concentrating the main building footprint within the relatively flat south-eastern portion of the site. This approach will reduce the need for extensive earthworks and will allow the development to fit more naturally within the existing landscape. The remaining portions of the site will largely retain their natural character, contributing to the open and landscaped environment associated with retirement estates.

In addition to the residential units, the development will incorporate communal and recreational spaces aimed at promoting a sense of community and well-being among residents. These areas may include landscaped gardens, seating areas, and shared facilities where residents can socialize, relax, and participate in community activities. Such facilities are considered an important component of retirement developments as they contribute to social interaction, active lifestyles, and overall quality of life for residents.

From a convenience and service perspective, the retirement resort will also provide a dedicated shuttle service for residents, operating several times per week. This service will facilitate access to nearby shopping centres, medical services, and other essential amenities within Knysna, thereby ensuring that residents who may not have access to private transport are still able to meet their daily needs comfortably and safely.

Overall, the proposed development is intended to create a well-integrated retirement living environment that combines comfortable residential accommodation with accessible design, communal facilities, and supportive services, while maintaining the low-density and peaceful character associated with the broader residential setting of Knysna.

4.2 Need and desirability.

4.2.1 Need for the Proposed Development

➤ Demand for Retirement and Age-Appropriate Accommodation

The town of Knysna, situated within the Garden Route, is widely recognised as a retirement and lifestyle destination, attracting a growing number of elderly residents due to its coastal environment, climate, and quality of life.

This demographic trend has resulted in an increasing demand for specialised residential accommodation catering to older persons, including managed retirement facilities that provide secure living environments and communal services.

The proposed development of 20 flat units forming part of a retirement resort will therefore contribute to addressing this demand by providing appropriate housing options for the elderly population, which is an important component of a balanced and inclusive residential market.

➤ Utilisation of Vacant and Undetermined Land

The subject property is currently vacant and zoned “Undetermined”, which effectively limits its ability to contribute to the local housing supply or economic activity.

Rezoning the property to “General Residential Zone III” will:

- Enable the orderly development of the property,
- Ensure the land is used in accordance with the municipality’s land use management framework, and
- Allow the property to contribute to residential accommodation within the urban area.

➤ Efficient Use of Existing Infrastructure

The property is located within the urban edge of Knysna and in proximity to the existing residential neighbourhood accessed via Barracuda Street.

As such, the proposed development will make use of existing municipal infrastructure networks, including:

- Local road infrastructure,
- Water and electricity services, and
- Municipal service networks.

This promotes infill development and more efficient utilisation of existing infrastructure, rather than encouraging outward urban sprawl.

4.2.2 Desirability of the Proposed Development

➤ Compatibility with the Surrounding Area

The surrounding area is characterised by low-density residential properties and natural vegetation, forming part of the broader suburban environment of Knysna.

The proposed development will consist of 20 residential units in the form of flats, which represents a moderate residential density appropriate for a property located within the established urban area.

Furthermore, retirement developments generally generate:

- Lower traffic volumes,
- Reduced noise levels, and
- Limited environmental disturbance,

making them compatible with surrounding residential land uses.

➤ Contribution to Housing Diversity

The introduction of a retirement resort will broaden the range of housing options available within Knysna, particularly for the elderly population who may require:

- Secure residential environments,
- Smaller and more manageable dwelling units, and
- Proximity to urban services.

Providing such housing diversity contributes to sustainable community development and demographic inclusivity.

➤ Economic and Social Benefits

The proposed development will generate positive economic and social impacts, including:

- Employment opportunities during the construction phase,
- Ongoing employment associated with facility management and maintenance, and
- Increased local economic activity through spending by residents and visitors.

Retirement facilities also contribute to the local healthcare and service economy, which is an important sector within towns along the Garden Route.

➤ Alignment with Sound Spatial Planning Principles

The proposal supports key spatial planning principles, including:

- Efficient land use, by developing vacant land within the urban area;
- Compact urban form, by promoting residential development within existing settlements; and
- Sustainable development, by locating residential facilities close to services and infrastructure.

The proposed change of land use rights of the property to include the use of a retirement resort is considered both necessary and desirable as it:

- Responds to the growing demand for retirement accommodation in Knysna and surrounding areas,
- Enables the productive use of currently vacant land,
- Promotes efficient utilisation of existing infrastructure,
- Provides diversity in housing opportunities, and
- Is compatible with the character of the surrounding residential environment.

The proposal therefore represents an appropriate and sustainable land use intervention within the broader urban context of Knysna.

5. **CURRENT LAND USE AND PLANNING POLICIES**

5.1 **National Development Plan, 2030 (NDP)**

The National Development plan is a long-term development vision guiding the development of a country. The NDP propose the following spatial development principles which guide development:

- Spatial justice - The historic policy of confining particular groups to limited space, as in ghettoization and segregation, and the unfair allocation of public resources between areas, must be reversed to ensure that the needs of the poor are addressed first rather than last.
- Spatial sustainability - Sustainable patterns of consumption and production should be supported, and ways of living promoted that do not damage the natural environment.
- Spatial resilience - Vulnerability to environmental degradation, resource scarcity and Climatic shocks must be reduced. Ecological systems should be protected and replenished.
- Spatial quality - The aesthetic and functional features of housing and the built environment need to be improved to create liveable, vibrant and valued places that allow for access and inclusion of people with disabilities.
- Spatial efficiency - Productive activity and jobs should be supported, and burdens on business minimised. Efficient commuting patterns and circulation of goods and services should be encouraged, with regulatory procedures that do not impose unnecessary costs on development.

The proposed development will contribute to creating a more densified and compact urban form. By redevelopment and creating a compact urban form it enables cheaper provision per building unit of bulk services including water, sewer and electricity. It creates more affordable housing opportunities while simultaneously contributing to a larger choice of home and living conditions to choose from. Densification and compaction lead to being closer to employment opportunities and makes provision for employees to live closer to their place of employment.

It enables residents to conduct their daily activities quickly and inexpensively as possible and contributes to the promotion of using public transport and creating walkable cities.

5.2 Western Cape Spatial Development Framework, 2014 (PSDF)

The Western Cape Provincial Spatial Development Framework (PSDF), 2014 sets out five key provincial settlement policy objectives aimed at guiding sustainable, integrated and inclusive settlement development throughout the province. These objectives provide a framework for evaluating land use changes and development proposals within the broader spatial vision of the Western Cape.

Below is a summary of the objectives together with a brief motivation indicating how the proposed rezoning to “General Residential Zone III” and consent use for a retirement resort supports these policy directives.

Objective	Support
1 Protect and Enhance Sense of Place and Settlement Patterns: This objective seeks to protect the unique character, landscape and identity of settlements in the Western Cape while reinforcing logical and sustainable settlement patterns. Development should respond to the environmental context and maintain the distinct sense of place associated with each region.	The proposed retirement resort will be developed in a low-density format within a natural environment, consistent with the character of the greater Knysna and Garden Route landscape. The development footprint will be concentrated on the relatively flat south-eastern portion of the property, limiting unnecessary site disturbance and maintaining the surrounding environmental character. The scale and design of the development will therefore reinforce the existing settlement pattern while contributing to the area's established sense of place.

2	Improve Accessibility at All Scales: The PSDF promotes improved accessibility between settlements and within settlements, ensuring that residents have reasonable access to economic opportunities, services and community facilities.	The subject property is located approximately 4.3 km south-east of the Knysna CBD and is accessible via a right-of-way servitude extending from Barracuda Street. Its proximity to the urban centre allows residents convenient access to healthcare, retail facilities and other services. In addition, the proposed shuttle service for residents will further improve accessibility for elderly residents who may have limited private transport options.
3	Promote an Appropriate Land Use Mix and Density in Settlements: This objective encourages an appropriate mix of land uses and densities within settlements in order to support sustainable urban development and efficient infrastructure utilisation.	The rezoning to General Residential Zone III will introduce a specialised residential land use in the form of a retirement resort. This contributes to a more diverse range of housing opportunities within the greater Knysna area while maintaining a relatively moderate density consistent with the surrounding environment. The development therefore supports the diversification of land uses while remaining compatible with the surrounding settlement context.
4	Ensure Effective and Equitable Social Services and Facilities: The PSDF promotes access to social services, community facilities and environments that support social interaction, wellbeing and quality of life.	The proposed retirement resort will incorporate communal and recreational spaces, allowing residents to socialise and participate in community activities. The development will therefore create an environment that supports the wellbeing and social needs of elderly residents while maintaining convenient access to the broader range of social services available within Knysna.
5	Support Inclusive and Sustainable Housing: This objective seeks to ensure that settlements provide a range of housing opportunities that are sustainable, accessible and responsive to the needs of different population groups.	The proposed development will provide approximately 20 residential units ranging between 80 m ² and 120 m ² , designed to accommodate the needs of elderly residents. The buildings will incorporate wheelchair-friendly design and easy movement throughout the development, ensuring accessibility and long-term suitability for residents. By providing specialised accommodation for retirees, the development contributes to the diversification of housing options within the Knysna area and supports inclusive settlement development.

Table 2: Western Cape Provincial SDF objectives

In terms of the Provincial Spatial Vision, reference is made to Figure 59: Western Cape Province – Consolidated Framework Proposals contained in the PSDF, which identifies the Garden Route region as an area with strong potential for leisure and lifestyle-related development.

The subject property, located within the greater Knysna area, falls within this broader regional context. The proposed retirement resort aligns with this provincial spatial vision as it supports the lifestyle and leisure economy associated with the Garden Route while providing specialised residential accommodation suited to the region's environmental and scenic qualities.

5.3 Garden Route District Municipality Spatial Development Framework, 2025

The Spatial Development Framework establishes a long-term spatial vision and development strategy for the Garden Route District, guiding land use decisions, infrastructure investment, and economic development across the district. The framework aims to create a sustainable, inclusive, and

economically productive district, while protecting its natural resources and supporting efficient settlement patterns.

The SDF provides a conceptual spatial structure that focuses on six objectives as indicated in the table below. Alignment of the Proposed Retirement Resort with the SDF Objectives indicated in the table below:

Objective	Support
1 Environmental Management: The SDF prioritises the protection and sustainable management of the district's natural resources, recognising that the environment is the foundation of the local economy and tourism sector.	1. The development footprint can be designed to avoid environmentally sensitive areas, ensuring minimal ecological disturbance. 2. Retirement resorts typically involve low-impact residential development, landscaped open spaces, and environmental stewardship. 3. The proposal supports the SDF objective of sustainable tourism and lifestyle developments that do not compromise the natural resource base.
2 Spatial Targeting: The SDF promotes focused development in strategic nodes where infrastructure and services can be efficiently provided.	1. It represents compact residential development rather than scattered rural development. 2. The development contributes to the consolidation of growth within existing settlement areas. 3. Retirement estates attract stable residential populations, supporting local nodes and service centres.
3 Movement Network: The SDF emphasises improving regional connectivity through roads, public transport systems, and transport corridors to enhance economic activity and accessibility.	1. It can utilise existing road infrastructure and regional movement corridors. 2. The development will generate limited traffic compared to commercial developments, making it compatible with existing transport networks. 3. Retirement resorts typically require safe and accessible mobility infrastructure, which complements the SDF goal of improving connectivity.
4 Sustainable Human Settlements: The SDF encourages compact, diverse, and integrated human settlements, with a variety of housing typologies located near services and economic opportunities.	1. It provides specialised residential accommodation for the ageing population, contributing to housing diversity. 2. The development can be integrated into existing settlement areas, supporting spatial efficiency. 3. Retirement developments often include community facilities and shared amenities, supporting sustainable neighbourhood design.
5 Infrastructure: The SDF requires infrastructure investment and maintenance to be aligned with spatial development priorities and sustainable technologies.	1. It can utilise existing municipal services and infrastructure networks. 2. Retirement resorts often incorporate energy-efficient design, water management systems, and sustainable technologies, supporting long-term infrastructure resilience. 3. The development contributes to efficient utilisation of existing service capacity.
6 Alignment Economic Development and Job Creation: The SDF recognises tourism, agriculture, and lifestyle development as key economic drivers in the district.	1. Lifestyle and retirement developments contribute to the tourism and lifestyle economy of the Garden Route. 2. The project will create employment opportunities during construction and operation, including property management, maintenance, healthcare, and service industries.

		3. Retirement residents contribute to local economic activity, supporting nearby businesses, services, and tourism enterprises.
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Table 3: Garden Route DM SDF Objectives

The proposed retirement resort is consistent with the Garden Route District Spatial Development Framework, as it will promote environmentally responsible development, supports spatially targeted settlement growth, utilises existing infrastructure, and contributes to economic development and employment creation within the district.

5.4 **Knysna Municipality Spatial Development Framework, 2025 (MSDF)**

The Knysna Municipal Spatial Development Framework (MSDF) establishes the Municipality's long-term spatial vision by integrating environmental protection, socio-economic development, sustainable urban growth, infrastructure planning and governance into a single planning framework. The SDF seeks to create integrated, liveable urban environments while preserving natural resources and ensuring efficient service delivery.

The proposed retirement resort consisting of 20 residential units is consistent with these objectives as it:

- Utilises underdeveloped brownfield land;
- Promotes infill development and urban consolidation;
- Is situated within the Urban Development Boundary;
- Falls within the Municipal Services Edge;
- Is located with ease of access to the N2 transport corridor promoted as a transport link to serve intensification and densification of land uses;
- Provides specialised and mixed housing typologies required by an ageing population;

With specific reference to Section D: Spatial Development Framework and subsections the following summary and motivation for the intended land use is provided:

➤ **Biophysical Framework**

The Biophysical Framework promotes the integration of environmental considerations into spatial planning to ensure sustainable social and economic development while protecting ecological resources. The MSDF recognises that development and environmental conservation should occur in a balanced manner rather than being mutually exclusive.

The Environmental Framework specifically:

- Protects Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs);
- Discourages inappropriate development within environmentally sensitive areas;
- Requires Environmental Impact Assessments (EIAs) where necessary;
- Supports conservation-compatible and low-impact land uses;
- Promotes sustainable urban development while preserving ecological integrity.

Although the property is identified adjacent to / or within an environmentally protected area, the surrounding area is already characterised by established residential development.

The proposed retirement resort:

- represents a low-intensity residential land use;

- is significantly less environmentally intrusive than commercial or higher-density alternatives;
- can retain environmentally sensitive portions through landscaping and open space design;

Consequently, the proposal aligns with the MSDF objective of balancing environmental protection with sustainable urban development.

➤ **Socio-Economic Framework**

The Socio-Economic Framework promotes:

- sustainable economic development;
- tourism and local economic development;
- improved social infrastructure;
- diversified housing opportunities;
- strengthening of communities; and
- development that enhances quality of life.

The Tourism Framework further encourages developments that enhance Knysna's attractiveness as a destination while promoting sustainable investment and collaboration between the private sector and local communities.

The proposed retirement resort directly supports these objectives by:

- providing specialised accommodation for an ageing population;
- creating permanent and construction employment opportunities;
- increasing local spending and supporting nearby businesses;
- attracting retirees who contribute to the local economy without creating significant traffic or industrial impacts;
- strengthening the diversity of housing choices within the municipality.

The proposal therefore contributes positively to the Municipality's social and economic objectives.

➤ **Built Environment Framework**

The Built Environment Framework promotes:

- efficient land utilisation;
- sustainable human settlements;
- compact urban form;
- infill development;
- higher densities in appropriate locations;
- mixed-use and integrated development;
- infrastructure optimisation;
- improved transport integration.

The MSDF specifically identifies the following principles:

- Targeted infill development;
- Strategic densification;
- Development along key corridors;
- Service-based growth;
- Preservation of neighbourhood character;
- Adequate infrastructure provision.

The housing strategy also recognises:

"With demographic aging, there's growing need for retirement villages, assisted-living complexes, and senior-focused accommodation near services."

The proposed development strongly aligns with these objectives because:

(a) Strategic Densification

The property is located with ease of access to the N2 corridor, identified by the MSDF as a major national transport corridor supporting economic activity and regional connectivity. Concentrating residential development near and along such corridors promotes efficient urban structure and accessibility.

(b) Brownfield Development

Rather than encouraging outward urban expansion, the proposal utilises underdeveloped land within an already urbanised environment, consistent with:

- infill development;
- efficient land utilisation;
- limiting urban sprawl;
- infrastructure optimisation.

(c) Urban Development Boundary

The site is located within the Urban Development Boundary where urban-related land uses are intended to occur and where structured growth is encouraged.

(d) Services Edge

The property also falls within the Municipal Services Edge, where the MSDF specifically states that infrastructure and services must be prioritised for densification and infill development.

(e) Housing Need

The MSDF expressly identifies an increasing need for:

- retirement villages;
- assisted living developments; and
- senior-focused accommodation close to services.

The proposed 20-unit retirement resort directly addresses this identified municipal need.

➤ **Consistency of the intended land use with the overall Planning**

The proposed retirement resort is fully aligned with the intent of the Knysna MSDF. Rather than representing isolated urban expansion, it gives practical effect to the Municipality's vision of sustainable, compact and integrated development.

The intended land use:

- promotes redevelopment of underutilised brownfield land;
- supports strategic densification along the N2 transport corridor;
- utilises existing municipal infrastructure within the Services Edge;
- remains within the Urban Development Boundary;
- addresses an identified need for retirement and senior-focused accommodation;
- contributes positively to local economic development and housing diversity; and
- balances development with environmental protection through appropriate integration measures.

For these reasons, the proposed 20-unit retirement resort is consistent with the aims, objectives and spatial vision of the Knysna Municipal Spatial Development Framework and should be regarded as a desirable and sustainable form of land development.

5.5 SPLUMA – Section 7 & WC Land Use Planning ACT, 2014 (Compliance with development principles)

(a) Spatial justice

Past spatial and other development imbalances must be redressed to include the previously excluded through improved access to and use of land.

The proposal contributes to spatial justice by promoting equitable access to residential opportunities within an established area. The development will utilise well-located land within an existing settlement context, allowing residents access to nearby services, facilities, and economic opportunities.

(b) Spatial sustainability

For communities to be viable there needs to be promotion of land development within the community and the protection of prime and unique agricultural land should be given special consideration.

Land development in locations which are sustainable and limit urban sprawl needs to be promoted as well as the promotion to stimulate the effective and equitable functioning of land markets.

The intended retirement resort promotes the subject principle in various ways including limiting urban sprawl because the area is densified. And it contribute by adding stock of which there is a need to a specific market.

(c) Efficiency

Land development should optimise the use of existing resources and infrastructure and decision-making procedures to be designed in a way that limits negative financial, social, economic or environmental impacts.

The change of land use allows for the efficient utilisation of land and existing infrastructure networks. The property can be serviced through existing municipal infrastructure systems, thereby optimising the use of available resources and avoiding unnecessary urban sprawl.

(d) Spatial Resilience

In ensuring sustainable livelihoods in communities most likely to suffer the impacts of economic and environmental shocks, the spatial plans, policies and land use management systems flexibility needs to be accommodated.

The proposal enhances spatial resilience by introducing a development that responds to changing demographic and housing needs. The development contributes to a diversified settlement pattern and supports long-term adaptability of the local area.

(e) Good administration

The application follows the prescribed statutory procedures and aligns with relevant municipal policies and planning frameworks. The proposal therefore supports transparent, consistent, and accountable decision-making in line with the objectives of sound land use management.

5.6 SPLUMA - Section 42(1)(c)(i) - Public Interest

Diversification and densification of properties in urban areas serves the public interest by promoting sustainable and inclusive development. By creating denser, more compact cities, public spaces are preserved, accessibility to essential services is enhanced, and transportation infrastructure is optimized. This benefits the public by reducing urban sprawl, improving air quality, and fostering a sense of community through mixed housing options. Additionally, the provision of basic services in closer proximity to residents ensures equitable access for all, regardless of socio-economic status.

Densification supports economic growth by generating employment opportunities in construction, maintenance, and service sectors, ultimately contributing to a thriving urban environment that meets the diverse needs of its residents. Ultimately, the public interest is served through the creation of livable, vibrant, and sustainable urban spaces that enhance quality of life for all.

5.7 SPLUMA - Section 42(2) - SPLUMA – Environmental consideration

In terms of Section 42(2) of the Spatial Planning and Land Use Management Act (SPLUMA), the competent authority must consider environmental impacts when evaluating a land development application.

The proposed change in land use does not trigger any listed activities in terms of the National Environmental Management Act (NEMA). The proposed development footprint is limited in extent and remains below the applicable thresholds that would trigger a formal environmental authorisation process in terms of the listed activities.

The property is located within the urban development boundary and forms part of an already developed area where similar land uses exist. An existing structure is already established on the property, indicating that the site has previously been disturbed and utilised for development purposes. The proposed land use therefore represents an intensification of use within an existing settlement context rather than the introduction of new development into an undisturbed natural environment.

Although environmental screening tools and biodiversity mapping indicate that the broader property falls within the Fynbos protected area as identified in the Garden Route District Threat Status, 2002, the proposed development will be confined to a limited portion of the site located in the southern section where development can be accommodated. The remainder of the property, which contains the more sensitive environmental components, will remain undeveloped and can continue to function as ecological open space.

Taking into consideration the limited scale of the proposal, the existing development footprint, and the location of the site within an established urban area, the intended land use is not expected to result in significant environmental impacts and does not trigger any listed activity requiring environmental authorisation. The proposal is therefore considered environmentally appropriate and consistent with the environmental considerations required in terms of SPLUMA.

6. PROVISION OF SERVICES

A Civil Engineering Services Report was prepared by Tuiniqua Consulting Engineers to assess the availability and capacity of municipal engineering services for the proposed development of Erf 4162 in Knysna. The report evaluates the provision of water, sewer, access, stormwater management, and solid waste services, and confirms that the proposed development can be adequately serviced by the existing municipal infrastructure under the authority of the Knysna Local Municipality

6.1 Water

Water will be supplied via a new 250 mm diameter pipeline connecting the development to the existing municipal reservoir located west of the site. The total average annual daily water demand for the previously proposed 36 residential units is estimated at approximately 21.6 kL per day, with a peak demand of approximately 1.15 L/s, which can be accommodated within the municipal system.

The proposed number of units is lowered to only 20 and therefore still falls within the provided estimates.

6.2 Wastewater

Sewer reticulation will be provided through a 160 mm gravity sewer line connecting the development to an existing municipal manhole in Heatherdale Street. The estimated sanitation load is 15.12 kL per day, which falls within acceptable engineering design parameters and can be accommodated by the municipal sewer network.

6.3 Electricity

At this stage of the application, a detailed Electrical Engineering Services Report has not been prepared, as the current application relates primarily to the land use approval stage and not the detailed design or construction phase of the development. It is standard planning practice that detailed electrical design reports are prepared and submitted during the building plan and service installation stages, when the final engineering design and technical specifications of the development are confirmed.

Notwithstanding the above, the owner and developer have committed to implementing a number of alternative and energy-efficient systems within the development in order to significantly reduce reliance on the municipal electrical network. These measures will include the installation of solar energy systems, battery storage solutions, gas/solar geysers, and gas stoves, thereby reducing the overall electrical demand generated by the development.

In addition, the development will incorporate supplementary solar generation and backup energy storage systems, which will further minimise peak demand on the municipal electricity grid and enhance the energy resilience of the development. These measures are aligned with contemporary sustainable development practices and contribute to reducing pressure on municipal infrastructure.

Given the relatively moderate scale of the proposed development and the intention to utilise alternative energy technologies, it is reasonable that the detailed electrical service design be addressed during the engineering design and building plan approval stage, when the final electrical load calculations and network connection requirements can be accurately determined.

The absence of a detailed Electrical Services Report at this stage should therefore not prejudice the consideration of the application, as the developer will be required to comply with all relevant municipal engineering service requirements and obtain the necessary approvals from the Knysna Local Municipality prior to the implementation of the development. Accordingly, the provision of electrical services can be appropriately addressed as part of the subsequent development and construction phases of the project.

6.4 Refuse

Solid waste will be managed through dedicated waste collection stations on site where residents will deposit refuse in wheelie bins. The estimated waste generation is approximately 5.4 m³ per week for the development, which will be collected and disposed of by the Knysna Municipality as part of the municipal refuse collection service.

6.5 Access

Vehicular access to the development will be obtained from Baracuda Avenue, utilising an existing access servitude. The access road will be upgraded to accommodate a two-strip driveway with passing lanes and appropriate stormwater drainage, ensuring safe and functional access to the development.

6.6 Stormwater

Stormwater from the development will be managed through a system of channels and pipes designed according to Sustainable Drainage System (SuDS) principles. Runoff will be collected from roofs and paved areas, conveyed through the internal stormwater system, and discharged into natural watercourses at the lower portion of the site.

7. TRAFFIC STATEMENT

At this stage of the application, a detailed Traffic Impact Assessment / Site Traffic Assessment has not been prepared as the current submission relates to the land use approval phase and does not yet involve the final design and layout of the development. In accordance with the provisions of the TMH16 Traffic Impact Study Manual, traffic studies are typically required at certain thresholds and once sufficient detail regarding the final layout, internal circulation, access configuration, and parking arrangements of the development are available.

The preparation of a Traffic Impact Assessment is therefore more appropriately undertaken during the Site Development Plan (SDP) approval stage, when the detailed design of the development has been finalised. At that stage, accurate traffic generation rates, access design, internal circulation, and intersection impacts can be properly assessed in relation to the surrounding road network.

It is further noted that the proposed development is of a relatively modest scale and residential in nature, which typically generates comparatively low traffic volumes. Residential and retirement-style developments generally produce predictable and evenly distributed traffic patterns throughout the day and do not normally result in significant peak-hour congestion when compared to commercial, retail, or industrial land uses.

Given the limited scale of the development and the anticipated low traffic generation, it is unlikely that the proposal will place a significant burden on the surrounding road network. Vehicular access to the site will utilise existing roads within the area, and the final access arrangements will be refined during the detailed design phase.

In light of the above, it is considered reasonable and appropriate that any Traffic Impact Assessment, should it be required by the relevant authority, be undertaken and submitted during the Site Development Plan evaluation stage, when sufficient design detail is available to enable a meaningful and technically accurate assessment in accordance with the guidelines contained in the TMH16 Traffic Impact Study Manual. This approach aligns with standard planning practice and ensures that technical studies are undertaken at the most appropriate stage of the development process.

8. CONCLUSION

Based on the planning assessment and the applicable policy and legislative considerations, the proposed land use is considered appropriate and should be favourably considered by the Knysna Local Municipality for the following reasons:

- **Compliance with Spatial Planning Legislation:**

The proposal is consistent with the development principles contained in the Spatial Planning and Land Use Management Act (SPLUMA), particularly in promoting spatial sustainability, efficiency, and good administration through the appropriate utilisation of land within an existing settlement context.

- **Alignment with Spatial Planning Policy:**

The development aligns with the strategic objectives of the Garden Route District Spatial Development Framework, which encourages sustainable settlement development, infrastructure efficiency, and economic opportunities linked to lifestyle and residential developments within the district.

- **Environmental Responsibility:**

Environmental considerations have been carefully evaluated in terms of Section 42(2) of SPLUMA. The development footprint is limited, falls below environmental authorisation thresholds, and will be confined to a specific portion of the site while protecting any environmentally sensitive areas identified.

- **Appropriate Location within an Urban Context:**

The property is located within the urban development boundary and within a developed area where services and infrastructure are available. The proposal therefore represents the logical and efficient utilisation of land without introducing development into previously undisturbed areas.

- **Positive Local Economic and Social Impact:**

The proposed retirement resort will contribute to the local economy through construction activities, permanent employment opportunities, and increased support for local businesses and services, while also providing specialised residential accommodation that responds to the growing demand for retirement living in the region.

- **Basic Services**

Based on the findings of the engineering services report, the proposed development can be adequately serviced in terms of water supply, sewer capacity, access, solid waste management, and stormwater control, subject to the implementation of the recommended internal and bulk infrastructure upgrades. The report therefore confirms that sufficient municipal engineering services are available to support the intended land use.

In light of the above considerations, the proposed land use represents a sustainable, policy-aligned and environmentally responsible development opportunity, and it is therefore respectfully submitted that the application be supported and approved by the Knysna Municipality.



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