

26.

**ADOPTION OF OVERSTRAND SPATIAL DEVELOPMENT FRAMEWORK:
OVERSTRAND MUNICIPALITY**

15/1/3/10/4

R Kuchar

Senior Manager: Town & Spatial Planning

8 May 2020

(028) 313 8900**1. Executive Summary**

The purpose of this report is to table a reviewed Overstrand Municipal Spatial Development Framework (OMSDF) for approval by Council for the 2020/2021 financial year.

2. Service Delivery and Budget Implementation Plan Reference

Infrastructure & Planning
Town Planning / Spatial Development

3. Compliance with Strategic Priorities

Provision of democratic, accountable and ethical governance
Promotion of Tourism, Economic and Social Development

4. Delegated Authority

None

5. Legal Requirements

Local Government: Municipal Systems Act, 2000 (Act 32 of 2000)
Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013)
Western Cape Land Use Planning Act, 2014 (Act 3 of 2014)
Overstrand Municipality By-Law on Municipal Land Use Planning, 2015

6. Background/Discussion/Comments/Conclusion**Background**

Since the establishment of the Overstrand Municipality in 2000, a variety of spatial plans has been adopted, including:

- Spatial Development Framework (27 October 2006),
- Overstrand Growth Management Strategy (26 January 2011),
- Integrated Development Framework (25 June 2014)
- Other smaller detailed Sectoral Development Plans.

All these plans were adopted in terms of the Local Government Municipal Systems Act (Act 32 of 2000) and the Land Use Planning Ordinance. However, following a total reform of spatial planning legislation in South Africa, the following new legislation are now applicable:

- Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013)
- Western Cape Land Use Planning Act, 2014 (Act 3 of 2014)
- Overstrand Municipal By-Law on Municipal Land Use Planning 2015

Therefore, the OMSDF was reviewed and aligned to comply with the new legislation.

For the review process an Intergovernmental Steering Committee was established consisting of various national, provincial and local authority departments. Attached is a list of the members of the Intergovernmental Steering Committee (Annexure A).

In addition, a technical committee consisting of representatives of all Overstrand Municipal Directorates had oversight of the review.

A public participation process was followed to obtain input from the public and other stake-holders. This process included public advertisements and public open days where the public and other stakeholders were invited to submit comments and inputs. The comments and inputs received are attached in Annexure B. A summary of the comments and the response thereto is attached in Annexure C.

Discussion

The main aims of the review was to:

- integrate the short term and long term spatial vision and strategies of the Overstrand Municipality into a single SDF, and
- align the OMSDF with new legislation, both in content and in format.

In the current reviewed OMSDF the Overstrand Growth Management Strategy (GMS) will serve as an informant to the OMSDF, by guiding the implementation of its growth vision. The GMS does not form part of the OMSDF and will be a strategy document adopted by Council on its own. This will, together with the other sectoral plans, serve as strategic documents informing the OMSDF, but not part of the OMSDF. This is to ensure flexibility and dynamism in development projects and to reduce red tape for developments.

In addition, the review of the OMSDF was mainly guided by changes in objectives, strategies and comments received during the process.

The main areas of change are the following:

Urban Edge

Urban edges were amended:

- in response to the most recent information on critical biodiversity areas, and
- in areas where the pressure of rapid urbanisation warranted the adjustment of the urban edge.

An example of the expansion of the urban edge is between Hawston and Fisherhaven. This creates a large enough area to facilitate the development of a full integrated, stable and sustainable human settlement development.

Capital Expenditure Framework

The Spatial Planning and Land Use Act requires that a Capital Expenditure Framework (CEF) must be included in the OMSDF.

As there is currently no regulations or guidelines on how the Municipality should give effect to this requirement, a proposed CEF is included in the OMSDF. This will be reviewed as clarifying regulations become available.

The Overstrand Municipality has been selected by the Provincial Government to draft a Municipal CEF in partnership with the Provincial Department of Local Government and the Development Bank of South Africa. In addition, the Infrastructure and Planning Directorate has commenced with a process to review its masterplans for municipal services to align with the OMSDF.

Housing Settlement Planning

The OMSDF made provision for integrated development approvals in order to remain flexible to accommodate every strategy of Overstrand Municipality including the housing settlement plan.

The need for a separate housing plan exists. However, the spatial distribution and time frames for government subsidised housing projects are heavily depended on National Government directives, strategies and financing. For this reason a housing settlement plan is seen as a separate document serving as an implementation strategy towards the OMSDF. It could possibly be included in the Overstrand Growth Management Strategy. However, the details of such a plan is not included in the reviewed OMSDF, but remains a component of the Integrated Development Plan.

Extract of Key Comments and Subsequent Amendments

It is deemed important to provide an outline of the unique spatial planning policy framework of the Overstrand Municipality with specific focus on where the OMSDF fits into this framework. The OMSDF forms the strategic spatial policy framework which guides development, management and conservation within the Municipality on a broad scale. The OMSDF does not contain

project/site specific detail in its proposals in order to keep the framework strategic and flexible in its daily application.

The higher level of detail components are contained in a suite of council policies, which include the Overstrand Growth Management Strategy (OGMS), the Human Settlement Plan (HSP), the Engineering Master Plans (EMP), Integrated Transport Plan (ITP), etc. The reader of the OMSDF will therefore, for example, identify an area earmarked for new urban infill (residential, community facility and mixed land uses) which is not refined to a site/project specific level. The detail pertaining to the delineated area will be available in the various aforementioned Council documents informed by the provisions of the OMSDF.

Unfortunately, despite clearly outlining this unique context during the Intergovernmental Steering Committee meetings and at the public open days, it became evident that most commenting parties did not take cognisance of this context. This led to numerous requests for detail regarding specific and individual development proposals, amongst others, including existing, future and envisioned housing projects. There were also a number of requests to add detail to the OMSDF for specific aspects such as detailed road upgrades, etc. Additional information was also requested with regard to the provision of specific community facilities.

The detail requested, as outlined earlier, is not provided in the OMSDF for reasons of ensuring flexibility. This was clearly outlined and explained in the “response to comments” report in Annexure C. Detailed information regarding all housing, densification and community facility provisions will be provided in the Municipality’s revised Human Settlement Plan and Growth Management Plan.

A number of plans were updated based on information requested by commenting parties and the spatial planning policy context section of the OMSDF was revised to include additional policy extracts.

The aforementioned is a brief outline of the key items received during the public participation and stake holder engagement process. All comments were responded to in the “response to comments” report in Annexure C.

Conclusion

The OSDF is a flexible and dynamic document which requires constant monitoring, review and changes. This constant monitoring, review and changes will be done as prescribed by the Municipal Systems Act on an annual basis.

Taking cognisance of the above it is recommended that Council adopts the OMSDF for the 2020/2021 year as included in Annexure D.

7. Financial Implications

N/A

8. Staff Implications

N/A

9. Comments from other Departments, Divisions and Administrations

N/A

10. Annexures

- Annexure A: List of members of the Intergovernmental Steering Committee
- Annexure B: Comments and inputs received
- Annexure C: Summary of comments and response thereto
- Annexure D: Overstrand Spatial Development Framework document (**To be distributed on a Memory Stick**)

RECOMMENDATION TO THE COUNCIL:

1. that the following Council resolutions **be rescinded**:
 - 2006 (Council's resolution 27 October 2006), Overstrand Municipal Wide Spatial Development Framework;
 - 2011 (Council's resolution 26 January 2011) Overstrand Municipal Spatial Growth Management Strategy; and
 - 2014 (Council's resolution 25 June 2014) Integrated Development Framework together with detailed Sectoral Plans;
2. that the Overstrand Municipal Spatial Development Framework (as attached per Annexure D) **be adopted** for the 2020/2021 financial year in terms of Section 20(1) of the Spatial Planning and Land Use Management Act, 2013; and
3. that the Overstrand Spatial Development Framework **be adopted** as part of Overstrand's IDP for the 2020/2021 financial year.

RESPONSIBLE OFFICIAL :**R KUCHAR****TARGET DATE FOR IMPLEMENTATION :****11 JUNE 2020****TARGET DATE TO INFORM APPLICANT :****N/A****TARGET DATE TO INFORM OBJECTOR :****N/A**

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Town Planning
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For attention: Mr. R. Kuchar

COMMENT: DRAFT OVERSTRAND SPATIAL DEVELOPMENT FRAMEWORK 2020 (DATED JANUARY 2020)

This letter serves as the official comments from the Directorate: Planning (Dept. of Human Settlements Western Cape) on the above document. These comments follow on previous inputs on the status quo report in February 2019.

The objective of this review is to check if previous comments were addressed and if the overarching goal of the comments are to ensure alignment between the Dept. of Human Settlements' Strategic Goals for human settlement development and those of the Overstrand Municipality as reflected in this SDF.

1) High level Comments:

- 1.1 From a human settlement perspective one of the key objectives of the SDF is to address distorted spatial patterns, fragmentation, prioritise development interventions and projects in previously disadvantaged areas with the highest potential and physical capacity to accommodate sustainable growth. This includes identifying areas for compaction and intensification. In many cases the spatial representation of the proposals does not necessarily demonstrate to the reader how the Municipality envisages to achieve these objectives.
- 1.2 It is clear from the report that the Overstrand Growth Management Strategy (OGMS) is a critical document which must be read in parallel to the SDF to guide spatial proposals for new urban development areas, but this document is mostly outdated or silent and does not provide the necessary guidance on a local scale to identify areas where re-development interventions can and or should be prioritised.
- 1.3 It is acknowledged and appreciated that the Municipality seeks to have an SDF that is broad and strategic in its proposals to enable flexibility, whilst the OGMS focusses on informing the SDF proposals insofar as its densities, land use guidelines etc. but having said that, it is difficult to review and comment on the SDF as it is heavily dependent on the outdated proposals of the OGMS. Although it is recognised that these two documents are inter-dependant they should also be able to function as stand-alone documents.

- 1.4 The report acknowledges the importance of directing growth and development interventions to areas with the highest potential and physical capacity to accommodate sustainable growth, but the spatial proposals and strategies presented in Part 5 do not really filter through as one would have hoped for.
- 1.5 Throughout the report reference is made to a land audit undertaken as part of this process. To contextualise the reader, it will be useful if this information can be spatially demonstrated and the implication thereof on future planning unpacked.
- 1.6 On a district level it is important to understand the interrelationship between Overstrand and Theewaterskloof municipalities. As you know the draft SDF has identified Fisherhaven/Hawston as a future growth area. How will this impact the interrelationship between these towns and Botrivier which is situated in close proximity?
- 1.7 The perception is created in the report that the total housing need is defined as the total amount of informal structures. This is incorrect as the need cannot be determined merely by the number of informal structures. It must also include the broader waiting list which includes backyard dwellers. The total housing need may therefore be much greater than the estimated number of opportunities, which in turn will further impact on the total land area required. Although embracing informality is a priority, assisting backyarders in overcrowding conditions is also an important consideration that cannot be ignored.
- 1.8 What is the SDF's proposals in terms of densification policies? As previously noted it is clear that the SDF is heavily dependent on the OGMS for guidance in ensuring growth and development in confined urban settlement. Having said that, the OGMS does not seem to advocate densification and compaction in areas currently experiencing extreme population influx and shortage of suitably well-located land e.g. Kleinmond and Hermanus. It is imperative that the SDF not only acknowledge the realities on the ground, but also identify spatial proposals that will respond accordingly.
- 1.9 Mapping must be presented consistently throughout the document and must also align with the narrative, where relevant. Furthermore, mapping between SDF and OGMS must also be synchronised to contextualise the reader, particularly in the case of Hawston/Fisherhaven and Hermanus (West, Central and East).
- 1.10 The spatial presentation of housing related projects must be reflected consistently throughout the document (Perhaps give an example here of where this is not happening). Furthermore, the status quo maps should ideally include informal settlements, but also distinguish between and current and future housing projects to ultimately guide future proposals.
- 1.11 Unfortunately, the report also does not spatially reflect the Restructuring Zones gazetted by National, as well as the "Priority Housing Development Areas" (PHDA). These areas may have dramatic impact on not only future low-cost housing development, but also grant funding in general from National Government going forward. It must be noted that DHS in collaboration with the Municipality have identified these land pockets for human settlement development purposes, hence it is important to understand what the SDF envisages for these land pockets and where necessary coordination and alignment is imperative.
- 1.12 It was also suggested that a clear link must be drawn between the SDF and the Human Settlement Plan (HSP), specifically in terms of decanting and relocation strategies associated to informal settlement upgrading projects. The latest SDF has not been amended to stress this linkage between the two strategies.

2) Specific Comments:

The following are specific comments related to text found in the document, namely:

- 2.1 Page 21, Section 2.4.5, paragraph 3: the report states that Kleinmond has experienced a small growth of only 0.4% or 455 people over ten years. Is this correct? From a housing perspective

- a huge housing demand, comprising of a growth of both backyarders and informal dwellers was experienced over the last couple of years. Please update where necessary.
- 2.2 Page 23, Section 2.4.7 paragraph 1: Please clarify what is meant by CRU, taking into account that the CRU programme (rental housing) for those earning below R3501 no longer exists.
 - 2.3 The data reflected on Page 23, Section 2.4.7 paragraph 2 does not appear to be accurate and needs to be updated to be consistent with Table 2.7. It is further recommended that a breakdown of the informal settlements referred to be provided so as to contextualise the reader.
 - 2.4 Page 24 Section 2.4.8.1: The information in its current form does not respond to the realities experienced in the respective settlements. Where necessary the data needs to be updated to look beyond 2016. E.g. Kleinmond. Significant growth rates have serious implication for spatial planning in the area and region.
 - 2.5 According to Page 25, paragraph 8 and table 2.7 the housing need is based on shack count and estimated at 10000 opportunities. As previously noted this section must be revisited to not only focus on informal structures, but also the waiting list, which should include backyard dwellers.
 - 2.6 Table 2.9 on page 27 does not reflect the housing need for Hawston/Fisherhaven or is it captured under "Hermanus"? Where relevant kindly ensure that the housing need is correctly calculated to include all towns/settlements and that the land requirements (ha) is updated in alignment thereto.
 - 2.7 Page 61 the paragraph under "Stormwater" does not make sense and information appears to be missing. Please update.
 - 2.8 Page 63, Section 2.7.5: It is recommended that this section be dealt with consistently in respect of each node/ settlement and that the total amount of additional households / du should from the stance include overcrowding, waiting list etc. The housing need for the indigent should not be dealt with separately, but included in the total calculation. Which in turn should guide the spatial proposals and intervention needed to address the broader demand not only the lower income brackets.
 - 2.9 Confirm if the calculations on Page 73, paragraph 3 - 6 is in alignment with the recent land suitability study undertaken by the Overstrand Municipality? According to the report a total of approximately 65ha is required to address the housing demand, but it does not appear to have filtered through to the spatial proposals, nor does it seem to synchronise with the OGMS proposals.
 - 2.10 The area located between Hawston and Vermont seems to be omitted from the status quo information and is also only partially mapped. See "Plan 28 on page 79 and 82". E.g. Hoek van die Berg. As previously mentioned, mapping between SDF and OGMS also does not align and must be synchronised.
 - 2.11 Page 194 Section 5.7.2.2 paragraph 3 states that extensive detail pertaining to the growth management proposals is presented in the OGMS, but because the last mentioned document is outdated only partial direction is provided.
 - 2.12 As a minimum the report should demarcate development intervention areas. What are the implications of the key policy statements LO 3 (i) to (iii) on page 198 and how do-the SDF proposals and OGMS intend to respond?
 - 2.13 Page 199, Plan 55 still shows the open space area in Schulphoek as a CBA area. Kindly update mapping to respond to the onsite realities. Furthermore, the OGMS makes no recommendations in respect to densification for Schulphoek / Zwelihle. As a minimum the SDF and OGMS must be updated to better align and provide spatial proposals.
 - 2.14 Page 206 Section iii – please clarify as this statement does not align to the population growth experienced in Zwelihle/ Mount Pleasant. Densification interventions in this area, particularly Schulphoek will be critical. Similarly, as in the case of Hawston/ Fisherhaven and Gansbaai.

- 2.15 According to the status quo for Gansbaai over 231ha of land will be required by 2031, but Page 222 does not identify any new development areas, but rather promotes densification. Does this land requirement include current housing projects such as Masakhane and Blompark that are currently been implemented? The same goes for Stanford. Furthermore, the OGMS will need to where relevant be updated to reflect the status quo in respect of zonings, land use and densification.
- 2.16 New urban infill areas are identified for smaller second order towns such as Pearly Beach and Stanford, which ~~is~~ are not generally considered as priority areas, whilst in other towns such as Kleinmond no new urban development areas are proposed, does this align with the SDF objectives?

We trust that the above comments will be perceived as positive inputs aimed towards contributing towards finalization of a credible this SDF.

Regards,



REGIONAL PLANNER OVERSTRAND MUNICIPALITY: MS. E. PELSER

DATE: 19 March 2020

Cc: Urban Dynamics



Environmental Affairs and Development Planning
Directorate: Spatial Planning
Our ref: 15/4/3/2/BO3

Mr Riaan Kuchar
Senior Manager: Town and Spatial Planning Department
Overstrand Municipality
PO Box 20
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7200

Dear Mr Kuchar

**COMMENT ON THE OVERSTRAND MUNICIPALITY DRAFT SPATIAL DEVELOPMENT FRAMEWORK
JANUARY 2020**

Thank you for providing us with an opportunity to comment on the Overstrand Municipality Draft Spatial Development Framework (SDF).

In an attempt to facilitate the commenting process from various Provincial Departments, we held a Spatial Development and Infrastructure Support Committee (SDIS) Meeting for the draft SDF on the 12th of March 2020. The purpose of this meeting was to ascertain if there were any areas of conflict in the input from the various Provincial Departments, and to highlight possible areas for individual departments to consider. Following this meeting some Provincial Departments chose to submit their comments directly to Overstrand Municipality whilst others asked that their comments be included in those of the Department of Environmental Affairs and Development Planning (DEA&DP), and have therefore been included below.

To begin with, please find the comments of the DEA&DP Directorate Spatial Planning. For ease of reference, these comments follow the structure of the Draft SDF.

"Part 1: Introduction"

Section "1.1 Background" refers to how the tender brief and scope of work includes:

"To update and merge the MSDF (2006) with the Overstrand Integrated Development Framework (IDF 2014) and the Overstrand Strategic Environmental Framework (EMF 2014)" and;

"To strategically, as a separate and consistent exercise, update the Overstrand Growth Management Strategy (OGMS) to include commercial and industrial components and any other relevant growth management strategies / spatial amendments".

On enquiring with the Municipality as to the progress with the OGMS we learnt on the 12 of March 2020, that this Strategy is in the process of being compiled. The fact that it is not yet available for scrutiny is unfortunate as the SDF needs to be read together with the more detailed information provided in the OGMS.

"Section 1.4 Key Statutory Requirements"

Table 1.1. lists the 5 SPLUMA principles and the implementation thereof. Under the principle of "Spatial Resilience" reference is made to disasters, both natural and man-made. The possibility of a disaster as the result of fire appears to have been overlooked in the SDF. The possibility of veld fires in the Overstrand Municipal area is a very real threat, with the Municipality having to deal with such fires on numerous occasions. Yet the SDF is silent on the question of veld fires and settlement interface, in particular. This despite the fact that the draft SDF reads: "Identify and prioritise areas most vulnerable to possible disasters". It is suggested that prior to the approval of this SDF a check is done to determine whether or not the SPLUMA principles have been adequately addressed, as was the stated intention at the outset.

"Part 2: The Overstrand Municipal Area"

"Section 2.4 Our people"

Within this section what is missing is a list of all the towns/ settlements in the Municipality, with clear population projections per town up until 2030. Such information is available from the Department of Environmental Affairs and Development Planning. This information should be used to inform Table 2.9 on page 27 of the draft SDF.

"Section 2.4.10 Protest Action"

The SDF notes how there is a "particular demand for housing for middle-income wage earners, earning more than the minimum salary of R3 500/month, who are excluded from state housing programmes and forced to live in backyard dwellings". These middle-income wage earners are good social housing / inclusionary housing candidates, yet the SDF is silent on the application of the inclusionary housing policy. (In terms of SPLUMA, section 21 (i) the SDF should identify the

designated areas where a national or provincial inclusionary housing policy may be applicable). The SDF needs to be amended to spatially indicate where these designated areas are. Furthermore, while the need for housing in this segment of the market is identified, it would appear that later on the focus in the SDF when referring to housing need is on those earning under R3500 / month. It is suggested that when referring to the future number of additional dwelling units to be accommodated per settlement, that a clear distinction is made between the anticipated number of dwelling units per market segment.

"Section 2.4.11 The Future Housing Need"

This section states that the housing need in Overstrand is calculated based on the number of people living in informal structures as well as households living in overcrowded conditions. From this one can assume that the "middle income wage earners" as referred to above, are included. Yet, further on in this section, in Table 2.9 it is stated that this table "depicts the housing need for the indigent". Is the reader to assume that the "indigent" include the "middle income wage earners"? If this is the case, then the SDF should specify this, to avoid any uncertainty.

Table 2.9 groups the housing need for the Municipality into "four towns", namely Hangklip-Kleinmond, Gansbaai, Stanford and Hermanus. Should the reader assume that reference to Hermanus also includes Zwelihle and Hawston? Given that population growth is not equally spread in Overstrand, with some areas such as Zwelihle showing far higher growth rates than others, the decision to assign uniform population growth rates across the "four towns" to project the housing need in the Municipality until 2031, is questioned.

"Section 2.7.5 Urban Nodes"

Kleinmond

It would appear that 2 contradictory statements are made on page 73 with regards to Kleinmond. The first statement says "Based on an average household size of 2.6 persons per household, this amounts to a total requirement of 130 additional dwelling units by 2031." Further down on this page it is stated that the projected housing need is set to increase to 2468 dwelling units by 2031. Is the latter figure different because this is a cumulative total? This needs to be checked and reworded if necessary.

Hawston

It is noted on page 78 that the water treatment works will require upgrading if future developments are planned. In addition, it is noted that the bulk water storage capacity is limited and will therefore limit future development. These infrastructure upgrades should be seen as a priority since the Hawston/ Fisherhaven area has been selected as a future growth area for the Municipality. This information should feed into the Capital Expenditure Framework (CEF) component of the SDF.

Hermanus

On page 80 the draft SDF states that an additional 35 517 dwelling units will be required for the Greater Hermanus Area by 2031, based on an annual growth rate of 5.2% / annum. This growth rate is far higher than that which has been estimated by the Department of Environmental Affairs and Development Planning. (See the comment under "Section 2.4" above with regards to population projections.) At a density of 20du/ ha this equates to 1775 ha that will be needed. At a density of 15du/ha, 2 367ha of land will be needed. For the most part and as acknowledged in the text, the high population growth rate has been driven by the increase in the number of people living in Zwelihle. Given the limited space available for Zwelihle to expand much further, the sharp increase in population numbers currently experienced may well not be the norm going forward. In addition, as the SDF acknowledges on page 24 the area of Hermanus that extends from Mount Pleasant to Voelklip has seen a decline in population growth with a growth rate of -0.2% forecast for 2011 to 2016. Thus, the additional number of dwellings currently anticipated to be required by 2031, may well need to be re-evaluated, with the possibility that less additional land will be required.

As far as service infrastructure provision for Hermanus Central is concerned, the water pipe network needs to be replaced and an upgrade of the waste water system is required. Hermanus East needs an upgrade to the waste water treatment works, as well as an upgrade to the stormwater system. This information should feed into the Capital Expenditure Framework (CEF) component of the SDF.

"2.8 Facilities"

It is noted that Table 2:20, which shows Community Facility Requirements for Hermanus (including Zwelihle), does not include all the health care facilities that are currently available in

Hermanus. In the input from the Department of Health, which is included later in these comments, reference is made to the Hermanus Hospital as well as the Hermanus Community Day Centre, neither of which are reflected in the list of facilities included in Table 2.20. It is suggested that the facility lists for each town are carefully scrutinized to ensure that the existing facilities are correctly reflected.

The Directorate Strategic Immovable Asset Management Planning, within the Provincial Department of Transport and Public Works have indicated that a new Primary and High School are being planned for Zwelihle. Although the date for the construction of these schools is uncertain, the SDF should identify suitable sites for these two schools. It is acknowledged that the location of these sites may be included in the Overstrand Growth Management Strategy, but since the update of this Strategy has not been made available for comment with the SDF, this cannot be confirmed.

"Part 3: Spatial Vision, Strategies and Policies"

"3.2 A Liveable Overstrand"

One of the policies referred to on page 120, is "Progressively ensure housing provision for different lifestyle choices, income groups, life stages, household sizes and adequate provision for the aged". The text continues by listing which documents need to be referred to when implementing this particular policy. An important document that is not included in this list is the "Western Cape Land Use Planning Guidelines for Rural Areas, March 2019". (Table 2.1 in Part 2 of this SDF, incorrectly refers to the old version – namely the "Western Cape Rural Development Guidelines of 2018". The SDF needs to be amended to include the most up to date version of the document).

"3.3 An Environmentally Sustainable and Resilient Overstrand"

On page 128, one of the policies listed is to "Discourage development in areas where there are major infrastructure constraints". Whilst this may seem logical, it also needs to be recognized that areas with major infrastructure constraints are likely to be those areas with the greatest growth potential and development pressure e.g. Hermanus. People want to live in Hermanus as they believe it is an area of opportunity, the high population numbers in turn increase pressure on the infrastructure networks. Therefore, it is not always possible, nor does it necessarily make sense to discourage development in areas where there are major infrastructure constraints. The

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areas with the highest growth potential should in fact be prioritized for infrastructure provision. The other benefit of targeting areas with the most pressure is that the provision of infrastructure in these areas helps to mitigate the impact of failing infrastructure on ecosystems and ecosystem services.

"3.7 An Overstrand that enables a prosperous and diverse economy"

On page 144, "Policy ECO 3.vi" states that the "provision of bulk infrastructure and services to industrial areas must be given the highest priority". Whilst on the one hand, the reason for wanting to promote the functioning of industrial areas is understood, the flip side of this policy statement is that bulk infrastructure and services to low income and informal settlements is not seen as the highest priority. Given that the low income area of Zwelihle has seen significant population growth in the last few years, the policy position of focusing infrastructure investment in industrial areas may need to be reconsidered.

It is noted with concern that the Spatial Policy Directives do not speak to the need for integration between different communities and income groups, nor does it refer to the real need for spatial transformation, specifically to rid the municipality of apartheid spatial planning. The lasting effects of apartheid spatial planning remain, with the poor on the periphery of settlements, without access to adequate infrastructure and services. This reality should be acknowledged and addressed in the SDF, as apart from being good planning practice, it is a requirement of SPLUMA.

"Part 4: Spatial Development Strategy"

One of the overarching principles in section 4.2.1 is "**Containment**" – "The growth of urban nodes and rural / agricultural settlements should be strictly contained within well-defined boundaries, within new potential rural development areas contained by the same mechanism." The concept of "new potential rural development areas" needs further explanation. What would be considered a "rural development area"? Would this include a lifestyle estate in the rural area for example? If so, then the location and implications thereof should be discussed in the SDF. Whatever is envisaged here, a thorough cost-benefit analysis would need to be undertaken by the Municipality when considering a new "rural development area", which would need to look at both the short term and long term impacts to the Overstrand Municipality. (This would include impacts on biodiversity, unique or high value agricultural land, impact on existing farming activities, the municipality's existing reticulation network, the future use of minerals etc.)

As with the principle referred to above, we have a similar concern with the principle of "Land Use Diversification" – "The diversification of rural and industrial based development opportunities, based on locational and comparative resource advantages must be promoted in selected areas to stimulate economic growth and employment of the rural population". Whilst stimulating economic growth and employment in rural areas is certainly a goal to strive for, this can only happen in the context of understanding both the short and long term costs and benefits to the Municipality, its residents and other spheres of government of these "development opportunities". In addition, any "land use diversification" in rural areas must be in line with the Western Cape Land Use Planning Guidelines for Rural Areas. Furthermore, any land diversification needs to be done carefully so as to not undermine the existing economy e.g. allowing a residential estate next to a farm, and ending up with the residents trying to limit farming operations as they object to the noise or smell of the pesticides.

"Part 5: Planning Proposals and Strategies: Local Level"

Arabella and Benguela Cove

"Plan 51: 2050 Spatial Proposal Arabella and Benguela Cove", makes reference to a "Rural Edge". The SDF needs to set out what a "rural edge" is and what the implications are of such an edge. The National Spatial Development Framework also refers to a "rural edge", which is used to protect an area or region that has distinct rural qualities from "intruding uses". Should the reader interpret this rural edge to be the same as that in the NSDF? It is noted that the delineation of the 2050 rural edge is the same as the 2020 urban edge shown on Plan 52, with the only difference being in the naming of the edge.

Fisherhaven / Hawston

Under the heading "New Urban Development" on page 196, it is stated that the Greater Hermanus housing need for 2031 is foreseen to be 11 234 units, which translates to an area requirement of approximately 749ha based on a density of 20du/ha. However, on page 80, these same figures are given to accommodate the future projected housing need for Zwelihle alone. According to what is stated on page 80, 35 517 additional dwelling units will be needed by 2031 for the Greater Hermanus area. This discrepancy in numbers needs to be checked and the text amended as the implications for future land requirements are significant. It is

acknowledged that a significant portion of the Greater Hermanus housing need is to be accommodated in the Fisherhaven/ Hawston area.

Greater Hermanus

The "Hermanus Central Spatial Proposal 2020", Plan 58, on page 205 shows a 423.85ha area delineated with an "Urban-Rural Development Boundary", for the Hemel and Aarde Valley. Whilst this Department would support tourism facilities in this Valley, we do not support the development of rural residential settlements. These settlements are invariably enclaves for the wealthy, which undermine any attempts to facilitate integration and the transformation of existing racially divided settlements. In addition, as has been mentioned previously they tend to be marketed to the Municipality on the basis of the additional rates they will generate. In particular, the long term financial and other costs to the municipality are seldom unpacked and addressed in the development applications.

The SDF appears to be missing a 2050 Spatial Proposal Map for Hermanus Central. (There are 2050 maps for Hermanus West and Hermanus East)

Greater Gansbaai

The extent of land included in the Greater Gansbaai urban edge is approximately 2500 ha, with significant portions of this made up of "Sensitive Development Areas" and "Ecological Corridors". The Status Quo section of this SDF is not clear on the additional land for housing that will be needed to accommodate the anticipated population growth up to 2031. Numbers are given in the Status Quo section, but what is not clear is whether these numbers are for the Greater Gansbaai area, or the town of Gansbaai itself. It is suggested that the Status Quo section be reworded so that there is no confusion around what is being referred to. Regardless of how much land is anticipated to be needed to accommodate the population growth, the extent of the current urban area is excessive. The edges should be brought in to be in line with the extent of the built up areas, rather than including vast tracts of undeveloped land.

Pearly Beach

Plan 67: Pearly Beach Spatial Proposals 2020, indicates a "New Urban Infill" area of 21,08ha. This despite the fact that the status quo section of the SDF states that no additional land for development is required. The reason provided in the SDF as to why this additional land is needed, is because there are land constraints in most other settlements in the Overstrand and

Pearly Beach has land available to accommodate the Overstrand / Greater Gansbaai housing need. Providing housing / housing opportunities in Pearly Beach simply because there is land available, is not sustainable and should not be supported. In order to create a sustainable, well-functioning settlement, there need to be jobs, facilities and services, available land is only one aspect to be considered.

The Capital Expenditure Framework (CEF)

The CEF contained within the SDF is presented at a very high level. Whilst it is acknowledged that an attempt has been made to determine the funding gap between required municipal services and the affordability envelope of the Municipality, this is insufficient. No indication is provided as to where the Priority Development Areas are for investment i.e. no spatial guidance around what to invest where, is provided. It is noted that Overstrand Municipality has been prioritized for assistance to prepare the CEF. There are however certain minimum requirements that must be contained with the SDF to assist with the CEF development. The SDF must spatially identify the following to enable the preparation of a CEF:

- Functional areas and priority development areas.
- The hierarchy and/or typology of priority development areas.
- Population, household growth, economic activity and housing demand trends/ projections
- Anticipated land required across land uses to meet this demand
- Land available for development (current and future)
- Land use mixes and development yields linked to this projected demand
- The status of bulk infrastructure systems and facilities capacities etc.
- Location or locational requirements for new bulk and social infrastructure
- Backlogs (community, social and infrastructure)
- Confirm/ identify MSDF land and growth policies, spatial transformation proposals and recommended phasing
- Identify where/ what land should be acquired/ released for development and what type of development
- With reference to an existing LTFP, the current long term funding outlook, constraints and opportunities in the municipality
- Possible spatial drivers of municipal costs
- Current municipal, provincial and national government planned investments in the municipal area over the MTREF period.

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Input from Cape Nature is attached as Annexure A.

Input from the Provincial Department of Health

The needs/possible needs for the Overstrand area are as:

- Betty's Bay- Bay Satellite Clinic- Replacement. The clinic is being relocated into bigger facility – negotiation around a lease is underway.
- Gansbaai- Gansbaai Clinic- Upgrade and Additions. Additions are currently underway.
- Hermanus- Hawston Clinic- Upgrade and Additions. The clinic will be extended in the future when required and in terms of priority.
- Hermanus Hospital will be extended in the future only as and when required and in terms of priority.
- Pearly Beach Satellite Clinic to be investigated for possible extension in future if so required.

The Department of Health is not in agreement with the additional number of Health Facilities as recommended (by the CSIR) in the SDF. The current number of facilities (plus the identified possible extensions above) are considered sufficient up to 2030. (Detail of how the required number of facilities is determined by the Provincial Department of Health, is Attached as **Annexure B)**

It is important to note that the Hermanus Community Day Center was built to serve a dependent population of 60 000. The SDF needs to clearly reflect what the anticipated future dependent population is for Greater Hermanus, to give the Department of Health time to prepare, should the Day Care Centre need to be extended, or an additional Centre added.

Input from the Provincial Department of Transport and Public Works - Directorate Transport Policies and Strategies

Clause (Indicate clause/ regulation Number)	Comment (State why the clause/regulation or proposed amendment is not supported or what the problem is with the provision)	Suggestion (Suggested deletion/amendment/ addition)
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Page 8	List of statutory local policies under consideration for the SDF	Add the Overstrand ITP and the Overberg DITP to the list of local policies under consideration.
General Comment	The Overstrand Integrated Transport Plan (ITP) is currently being fully reviewed by the municipality as part of the Overberg District Integrated Transport Plan (DITP) update.	Key findings and recommendations from the ITP should be considered in the SDF.
Page 153 (4.3.2)	Mixed-use densification strategy	The densification strategy should be specified to be planned along strategically articulated transit corridors.
General Comment	The Overstrand SDF should take cognizance of the Provincial Sustainable Transport Programme (PSTP)	<p>The Western Cape has identified Overstrand Municipality as a partner to jointly achieve the objectives of the PSTP.</p> <p>One of the key outcomes of the PSTP initiatives was an Overstrand Sustainable Transport Plan (OSTP). The plan was jointly developed by the Overstrand Municipality and the Western Cape Government and was endorsed by the Overstrand Municipal Council on 31 October 2018.</p> <p>The six strategies that are proposed by the OSTP include the following:</p> <ul style="list-style-type: none"> □ The improvement of public transport and the enhancement of public transport facilities. (These facilities may need to be prioritised in the Capital Expenditure Framework component of the SDF?)

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		<ul style="list-style-type: none"> □ The promotion of NMT initiatives and the improvement of the associated infrastructure. (Once again, this may need to be prioritised in the Capital Expenditure Framework component of the SDF?) □ Encouraging smarter choices by transport users through education and awareness campaigns. □ Efficient road and effective traffic management. □ Integrated development planning. <p>The municipality should engage the Western Cape Department of Transport and Public Works (DTPW) in this regard.</p>
General Comment	P 162 + p 174 + p214 –New Urban Development areas proposed on the peripheries of the Rooiels, Stanford and Betty's Bay areas	Full traffic impact assessments should be conducted. The developments should prioritise non-motorised transport (NMT) infrastructure and safe access for pedestrians and cyclists.
Page 3	Spatial Sustainability (settlements focus area)	Development initiatives must be linked to transit corridors for integration of land-use and transport.
Page 4	Spatial resilience (environment focus area)	Disaster management plans must link with transport disaster management plans through the ITP and PRTMCC to coordinate efforts for evacuation and emergency response.

General comment	The IDP of the Overstrand Municipality lists various energy targets under its strategic directives which encourage the rollout of various transport infrastructure initiatives, particularly to support walking and cycling, park and ride facilities and public transport ranks.	These should be considered within the SDF.
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Input from the Department of Environmental Affairs and Development Planning -Directorate Biodiversity and Coastal Management

It is critical that the municipality ensures that all biodiversity information in the SDF be updated to match that which is contained in the Western Cape Biodiversity Spatial Plan of 2017, as this plan represents the most up-to-date scientific information.

Input from the Department of Transport and Public Works -Directorate Infrastructure Policies and Strategies

Clause	Comment	Suggestion
General comments	With the understanding that this is still a draft version, it is suggested that a final editing of the Overstrand Municipal Spatial Development Framework (OMSDF) includes formatting, numbering, spelling and grammar checks to address the minor errors throughout the document. Additionally, the lack of consistency with the titles for all maps should be addressed.	
	<p>Several reports that apparently contain baseline information that informed the OMSDF are referenced in document. These reports were not distributed or annexed to the OMSDF.</p> <ul style="list-style-type: none"> • The Economic Overview of the Overstrand Economy 2019; • The Socio-Economic and Demographic Analysis Report; and 	

18/66

Clause	Comment	Suggestion
	<ul style="list-style-type: none"> • Growth Management Strategy. References to sources and statistics should be clearly indicated.	
Part 1: Introduction 1.1 Background Page 1	<p><i>"To compile the Municipal Spatial Development Framework (MSDF) in such detail, to enable future motivation to the Department of Environmental Affairs and Development Planning (DEA&DP), for all land within the new urban edge to be approved as urban areas in terms of the National Environmental Management Act, 1988 (NEMA)."</i></p> <p>The municipality should be upfront about the reasons it deems the future expansion of the urban edge necessary. The above statement is vague and should perhaps be removed from the introduction and be discussed in detail in Section 5 of the OMSDF. Section 5 deals with Planning Proposals and Strategies at a local level in Overstrand Municipality.</p>	<p>The development of sustainable human settlements prioritise citizen need and considers the total cost to government. Therefore, the Department of Transport and Public Works (DTPW) advises that all vacant land within the existing urban edge be developed as far as possible before considering the further expansion of the urban edge.</p>
2.3 Statutory Policy Context Page 8	<p>This section lists the National, Provincial, District and Local policies that have been considered and included in the OMSDF.</p>	<p>The NSDF provides a spatial transformation plan from a national government perspective. The OMSDF should consider the NSDF's</p>

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	However, the National Spatial Development Framework (NSDF) is not included in this section.	plans and possible linkages with projects that can be leveraged to access funding and reduce socio-economic challenges in the municipality.
2.4.2 Demographics: An Introductory Synopsis Page 15 -16	The municipality developed their own methodology for projecting population growth. For aligned and improved service delivery, it is necessary for all stakeholders to use the same baseline information to plan for communities. Therefore, DEA&DP compiled population projections for all government stakeholders to use.	To ensure consistency and the alignment of plans across government spheres and departments, the municipality should consider using the DEA&DP population projections.
2.4.3 Selected Statistics: Overstrand Municipal Area (2011-2016) Page 17	Reference is made to the "Eden District". The "Eden District" has been renamed as the "Garden Route District".	It is recommended that references to the "Eden District" be replaced with the "Garden Route District Municipality" throughout the document.
5.8.3 Greater Hermanus 2020-2030 MSDF Spatial proposals (West, Central and East) Page 204 - 206	The OMSDF indicates the Zwelihle as a high-density area (statistics provided on page 19 and 20). The land invasion of an old dump mound called Marikana is also mentioned in the OMSDF. However, no indication of plans or proposal to address informality in the area is included in the document.	The OMSDF indicates that 60% of dwellings in Zwelihle is formal and the area has densities of 8615 persons per square kilometre. The high densities indicated in the Zwelihle is raised as a concern. However, the OMSDF does not contain

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Clause	Comment	Suggestion
		<p>plans or proposals to address this situation.</p> <p>It is therefore recommended that OMSDF references relevant information from its Human Settlements Plan (HSP) on how it intends to deal with the high densities in informal settlements in the municipality.</p>

Thank you once again for providing us with an opportunity to comment on the Draft Overstrand SDF. Should you have any queries related to these comments, please do not hesitate to contact Tania de Waal on 021 4834360 or email: tania.dewaal@westerncape.gov.za.

Yours sincerely



TANIA DE WAAL

REGION 2: DIRECTORATE SPATIAL PLANNING

DATE: 7th of April 2020

21/66

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General comment	The IDP of the Overstrand Municipality lists various energy targets under its strategic directives which encourage the rollout of various transport infrastructure initiatives, particularly to support walking and cycling, park and ride facilities and public transport ranks.	These should be considered within the SDF.
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26/66

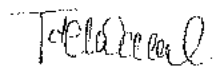
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Yours sincerely



TANIA DE WAAL
REGION 2: DIRECTORATE SPATIAL PLANNING
DATE: 7th of April 2020



**Western Cape
Government**

Transport and Public Works

ROAD NETWORK MANAGEMENT

9 Dorp Street, Cape Town, 8001
Tel: +27 21 483 2177 Fax: +27 21 483 2166
yusuf.ally@westerncape.gov.za

REFERENCE: TPW 16/9/6/1-TR28

ENQUIRIES: Mr Y Ally

20 March 2020

The Municipal Manager: Overstrand Municipality
PO Box 20
Hermanus
7200

(for attention: Mr Coenie Groenewald)

Dear Sir

**REQUEST FOR COMMENT: DRAFT SPATIAL DEVELOPMENT FRAMEWORK OF THE OVERSTRAND
MUNICIPALITY**

1. The Branch: Road Network Management received a request to provide comment on the draft Spatial Development Framework (SDF) at the Intergovernmental Steering Committee (IGSC) meeting held on Friday, 24 January 2020.
2. In terms of section 2.7.1 of Guidelines for the Development of Municipal Spatial Development Frameworks, published by the National Department of Rural Development & Land Reform, this Branch is the road authority for a number of strategic routes that traverse the municipality and therefore should have been invited to participate in the SDF development process. The Branch nevertheless makes itself available to engage with the municipality with regard to comments offered below and any further revisions to the SDF.
3. The SDF does not include any reference to the proposed Central Business District (CBD) bypass road that has been proposed by the Branch to address the long-term transport infrastructure needs of the municipality in response to growth and development. The bypass

is approximately 3 km long and will form part of the realigned R43 to the north of CBD, abutting Mountain Drive, past Hermanus Sports Complex and along Fairways avenue. The project is currently undergoing an EIA and is critical to maintaining a balanced network in terms of mobility and access.


In terms of the South African Road Classification and Access Management Guidelines (RCAM), the R43 is defined as a Class 2: Major Arterial and as such is required to fulfil an important mobility function. Such corridors are critical to ensuring the efficient movement of goods and services across the province and create an environment conducive to economic growth.

4. In addition to the CBD bypass proposal, the Overstrand Transport Plan makes reference to a number of proposals that are critical to addressing the long-term transport infrastructure needs of the municipality that are not included in the SDF. The proposals include the following:
 - The future grade separation of the R43/ R44 intersection should be accepted as an integral part of the long-term planning for the road network in this area.
 - Develop a parallel route between Hawston and Vermont to provide connectivity for local traffic and public transport, thereby preserving the mobility on the R43 for longer distance through traffic.
 - Finalise the planning of the parallel road scheme between Onrus and Sandbaai and proceed with the design of the new Onrus River bridge crossing. Possible solutions at the R43/ Onrus Main Road intersection should be considered and developed in greater detail.
 - Bergsig Street should be extended 130m westwards to enable closure of the Habonim access.
 - The proposed extension of Schulphoek Road and its connection with Church Street should be included in future Integrated Transport Plans for the region.
 - The authorities should examine the need for and feasibility of setting aside sufficient land for the long-term future grade separation of the R43/ Sandbaai Main Road intersection.
 - Extend the parallel link road from Swartdam Road to Prellewitz Road.
 - Prellewitz Road should be re-aligned creating a continuous ring road between Mountain Drive and Church Street.

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5. The Overstrand Transport Plan also proposes a number of strategies that should be implemented to manage the impact of growth and development on the transport network that have not been included in the SDF. This includes:
- Future ribbon development between Botrivier and Fisherhaven should be discouraged in order to protect the functional classification of the R43 and its uninterrupted mobility objectives.
 - Develop a comprehensive and integrated land use and transport growth management plan for the Hawston – Hermanus corridor with emphasis on maintaining future mobility.
 - Land use developments at Fisherhaven and Hawston should not be allowed to leapfrog across the R43 until all available development opportunities west of this road have been exhausted.
6. The Branch appreciates being provided with the opportunity to comment and trusts that the feedback provided will be of assistance.

Yours sincerely

PP


HEAD OF BRANCH: ROAD NETWORK MANAGEMENT



CONSERVATION INTELLIGENCE
Landscape South

postal No 16, 17th Ave Voelklip, Hermanus, 7200
 physical Same as above
 website www.capenature.co.za
 enquiries Vicki Hudson
 telephone 087 087 3851
 email vHUDSON@capenature.co.za
 reference SSD14/2/6/1/7/2/SDF_Overstrand
 date 27/03/2020

Department of Environmental Affairs and Development Planning
 Western Cape Government
 Private Bag X9086
 Cape Town
 8000

Attention: Tania de Waal
 By email: tania.dewaal@westerncape.gov.za

Dear Tania

Draft Overstrand Municipality Spatial Development Framework

CapeNature would like to thank you for the opportunity to comment on the Draft Overstrand Spatial Development Framework (SDF). Below please find the following consolidated comments pertaining to this SDF. Please note that our comments only relate to the biodiversity related aspect of the report.

General

It is noted that the mapping indicated in the SDF uses the 2010 Western Cape Biodiversity Framework. The 2010 WCBF took the separate maps for each district municipality and stitched them together to form a provincial map. The mapping for the Overberg District was undertaken by SANParks and was termed the Overberg Conservation Plan.

In 2017, CapeNature in conjunction with the Department of Environmental Affairs and Development Planning released the Western Cape Biodiversity Spatial Plan (WCBSPP).

Figure 1. and 2. below shows that the CBA information between these two publications differs.



Figure 1. 2010 Western Cape Biodiversity Framework – Gansbaai area

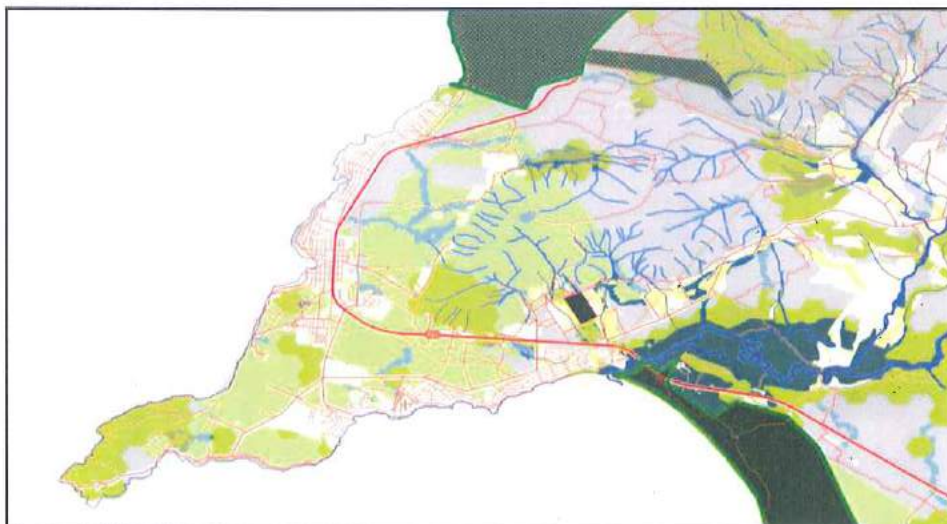


Figure 2. WCBSP – Gansbaai area

The WCBSP handbook² provides a set of land use guidelines that should be used to effectively aid in conserving the biodiversity of the Western Cape. The BSP Map is the product of a systematic biodiversity planning approach that delineates Critical Biodiversity Areas and Ecological Support Areas, which require safeguarding to ensure the continued existence and functioning of species and ecosystems, including the delivery of ecosystem services. The WCBSP replaces all previously published biodiversity informants to strategic forward planning and will be used in the revision of the Provincial Spatial Development Framework.

The Overstrand Spatial Development Framework document mentions Critical Biodiversity Areas (CBAs) but the CBAs indicated on the spatial plans for each town are not the most recent available (i.e. they are not the 2017 WCBSP CBA layer). The importance of Ecological Support Areas (ESAs) also needs to be emphasised in the document. ESAs are areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of Protected Areas (PAs) or CBAs, and are often vital for delivering ecosystem services. They support landscape connectivity, encompass the ecological infrastructure from which ecosystem goods and services flow and strengthen resilience to climate change. They include features such as regional climate adaptation corridors, water source and recharge areas, riparian habitat surrounding rivers or wetlands, and Endangered vegetation.

Protection and appropriate management of CBAs and ESAs is a vital part of increasing

resilience to climate change and this link should be explained in the SDF. The impacts of climate change pose significant threats to basic provisions for life including water, the environment, and food production.

The Western Cape is anticipated to become drier, intensifying stress on the Fynbos Biome. The result of this would be shrinkage of the Fynbos Biome which would be replaced by more arid biomes. Species distributions are therefore predicted to change; however, the mobility of the species distributions are fully dependent on the presence of intact corridors that can facilitate this movement. Species located in isolated fragments are likely to become extinct if they are unable to withstand the change in climate. Habitat fragmentation, caused by a variety of activities, has been identified as one of the greatest threats to biodiversity, as, amongst other things, it increases the vulnerability of ecosystems to climate change. Maintaining and enhancing habitat connectivity enables plant and animal communities to move and adapt in response to a changing climate. Creating functional connectivity in landscapes is a key aspect of promoting ecosystem resilience (the ability of the ecosystem to absorb a certain amount of change, yet still remain functional). Ecosystem resilience can be maintained or built through an approach that focuses on intact areas, maintaining biodiversity priority areas in a natural or near natural state, maximising connectivity between these areas and maximising the diversity of species and ecosystems.

The WCBSP analysis included detailed planning for securing a network of corridors across the province. Climate change adaptation features were integrated into a single climate change surface that was used in the spatial analysis. The selection of planning units for inclusion in Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) was thus 'skewed' towards areas that are important for climate change adaptation.

Decision-makers and planners can reduce the harmful impacts of climate change by integrating the BSP Map and guidelines into land use planning and decision-making, and by adhering to wise management guidelines, such as:

- Identifying key climate adaption corridors required for long term persistence of biodiversity pattern and process and implementing measures to protect the remaining corridor network particularly critical linkages, with biodiversity-compatible land uses;
- Maintaining intact riparian (river bank) and watercourse vegetation;
- Protecting water resources especially water source areas, watercourses and groundwater recharge areas;
- Managing invasive alien species;
- Implementing appropriate fire management; and
- Restoring and maintaining biodiversity for carbon storage.

In addition to safeguarding the environment, these measures can assist with disaster management, by reducing the vulnerability of human communities and built infrastructure to the impacts of natural disasters such as floods and droughts.

In the light of the above, from a biodiversity perspective, the following additions and edits are suggested to be made to the Overstrand SDF:

- The Overstrand SDF must be updated to take cognisance of the 2017 WCBSP which includes not only the shapefiles and maps but also the management guidelines contained within the WCBSP handbook.
- The SDF should include the definitions of ESA and the importance thereof. ESAs must be linked to ecological infrastructure.
- Spatial Planning Categories (SPCs) should be aligned to the WCBSP category (refer to Table 4.4 in the WCBSP 2017 Handbook).
- Land use categories suitability with regard to each BSP category should also be aligned (refer to Table 4.6 and 4.7 in the WCBSP Handbook).
- A map should be provided showing all the WCBSP categories for the Overstrand

- Municipality and surrounding municipalities.
- Another separate map should show which areas are earmarked for conservation (indicated as "areas to be conserved") and which CBAs may be desired for development (these should be indicated as potential conflict areas) and which areas are already developed or have environmental authorisation).
- A distinction needs to be made between Open Space that is intended for recreation versus those that will be conservation areas.
- Plan 6 should be replaced with the Western Cape Protected Area Expansion Strategy

On page 252, CapeNature is mentioned as a lead department for procuring funding for the identification of areas for inclusion into already protected areas. CapeNature is guided by the Western Cape Protected Areas Expansion Strategy. The lead in a fundraising role would need to be agreed at an organisational level prior to it being incorporated into this SDF.

It is noted that Fernkloof Nature Reserve has been accurately reflected on pa 59 but on plan 56 Fernkloof does extend beyond to border Vogelgat Nature Reserve. The developments for Fernkloof in the SDF are in line with their Protected Area Management Plan.

As there are areas for development within the urban edge which lie in wetland areas, it is suggested that that special restrictions be imposed for proposed buildings in these areas.

Point 4.3.6 Priority Areas for Biodiversity Conservation – this strategy should encompass all forms of stewardship as per appropriate for each site not limited to contract nature reserves signed up through CapeNature as this could be limiting.

Settlements

CapeNature supports the conservation areas in the west and the non-expansion of Rooiels, Betty's Bay and Pringle Bay settlements.

The coastal urban sprawl and ribbon development is predominant for the area of Hermanus from the suburb of Fisherhaven through to Hermanus East (Points 7-9 on the Settlements map) and will be exacerbated with the proposal development areas for Fisherhaven-Hawston in this SDF. The areas identified for development in the Fisherhaven- Hawston suburbs conflicts with the maps portraying areas of conservation importance and also identified climate change corridors (WC PSDF). The proposed corridors run through areas marked for development so this is confusing. It should be noted that the Bot River estuary bordering this settlement is a RAMSAR site hence of international importance with associated reporting accountability. It would be preferable to investigate further spatial integration and densification of existing areas situated closer to the town centre e.g. north of the R43 above the Onrus/Vermont.

For the town of Betty's Bay, Stony Point and the extent of the protected area undergoing proclamation needs to be recognised on map Plan 45 as per Plan 44.

In Kleinmond the area of CBA in the urban edge is shaded as Urban Development in Plan 50.

The area earmarked for development in the Gansbaai area also negates the current ecological process corridors and the proposed ecological corridors run directly through the development area (Plan 64) so clarity on this is required.

More detail should be provided regarding the development zone marked Urban Development – RDA in the Hemel-en-Aarde Valley on Plan 58. It would be recommended that the functionality of corridors and riparian areas be maintained.

The OppieKoppie informal settlement outside of Stanford and its community are not recognised in this SDF. It is placed outside the urban edge but forms an integral part of the town and requires municipal services. It also has the potential to show significant growth in the future and the municipality need to address this in their SDF.

The developments for Hoek van den Berg, Arabella phase 2 and the Hermanus By-Pass road have not been noted in this SDF.

The ecological buffer between Walker Bay Nature Reserve at the De Kelders side and the town of De Kelders is critical for ensuring conservation management is optimal and negative effects of the urban edge on the protected area buffered.

Conclusion

There appears to be an inconsistency between areas proposed for urban development but also classified as Sensitive Development areas and CBAs. The functioning of the proposed ecological corridors is not clear due to where they are situated and again often in areas of development.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely



Vicki Hudson
For: Landscape manager 2

General comment	The IDP of the Overstrand Municipality lists various energy targets under its strategic directives which encourage the rollout of various transport infrastructure initiatives, particularly to support walking and cycling, park and ride facilities and public transport ranks.	These should be considered within the SDF.
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Input from the Department of Environmental Affairs and Development Planning -Directorate Biodiversity and Coastal Management

It is critical that the municipality ensures that all biodiversity information in the SDF be updated to match that which is contained in the Western Cape Biodiversity Spatial Plan of 2017, as this plan represents the most up-to-date scientific information.

Input from the Department of Transport and Public Works -Directorate Infrastructure Policies and Strategies

Clause	Comment	Suggestion
General comments	With the understanding that this is still a draft version, it is suggested that a final editing of the Overstrand Municipal Spatial Development Framework (OMSDF) includes formatting, numbering, spelling and grammar checks to address the minor errors throughout the document. Additionally, the lack of consistency with the titles for all maps should be addressed.	
	<p>Several reports that apparently contain baseline information that informed the OMSDF are referenced in document. These reports were not distributed or annexed to the OMSDF.</p> <ul style="list-style-type: none"> • The Economic Overview of the Overstrand Economy 2019; • The Socio-Economic and Demographic Analysis Report; and 	

Annexure B**Department of Human Settlements - Planning for future Health Facilities**

1. When planning for future facilities, a number of factors are considered. These include, inter alia, compliance with emerging norms and standards such as ideal Clinic standards, published norms and standards, and infrastructure planning and design guidelines as well as accommodation for NHI service priorities (maternal and child health, outreach programmes, infection prevention and control).
2. Prioritisation is based on a number of factors, which include:
 - Prioritised lists received from the various Health Programme Managers and District Managers as well as indications from them regarding the accessibility rating and utilisation improvement actions which include over or underutilisation of current facilities supported by actual utilisation figures;
 - Availability of funding and capacity to deliver in terms of both infrastructure and operations;
 - Increased population figures in specific areas;
 - The Healthcare 2030 Acute Hospital Bed Plan and developed norms for the different levels of service required;
 - The availability and access to a site for a particular new facility;
 - National Department of Health's Ten Year Infrastructure Plan for Health Facilities in South Africa (for the period 2015 to 2025);
 - Human Settlement pipeline projects
3. At an operational level, individual projects would typically be compared to assess the extent of the impact of the project on the target community and how practical it will be to deliver the project within the MTEF, based on the following factors:
 - Prioritising heavily over utilised or non-existent facilities
 - Prioritising facilities in poor condition
 - Reducing the burden of disease in the area / district
 - Prioritising areas of rapid population growth
 - Prioritising projects where suitable sites are available
 - Prioritising facilities where resourcing of operations has been fully addressed (including maintenance and staffing)

- Prioritising facilities where consolidation of a number of facilities will result in improved operational processes
4. Access to larger (referral) facilities, such as Regional Hospitals, is also considered.
 5. The location of facilities is also determined on a number of factors, but mainly accessibility, safety, max of a 5km radius of the dependant population (as far as practically possible, given some remote areas) and availability of land.

Rina van antwerp - Draft SDF: kommentaar

From: Hanre blignaut
To: Riaan Kuchar
Date: 2020/04/07 11:05 PM
Subject: Draft SDF: kommentaar
Cc: Rina van antwerp; Stephen Muller
Attachments: Letter MM to Adaquo Extended Consent - Dec 2019.pdf; OM Letter of Support to Adaquo - 15 Feb 2019.pdf

Hi Riaan

Hiermee my kommentaar op die Draft SDF soos versoek:

p.37 par. 2.6.1: Usage from De Bos Dam is supplemented by 1.6 million m³/a of groundwater from the Gateway well field **as well as 1.2 million m³/a from the Camphill and Volmoed well fields in the Hemel en Aarde Valley;**

p.62 Plan 21: of OM's 6 waste water treatment works it appears that only the Pearly Beach WWTW is indicated on the plan?;

p.67 third bullet, last sentence: there are no plans or requirement to build an additional water treatment plant for Pringle Bay - this sentence can be deleted;

p.70 Bettiesbaai 3rd bullet, add: continuation of replacement of old water network pipelines is needed to reduce the high water losses;

p.74 Kleinmond 3rd bullet: the Kleinmond waste water treatment works **is in need of capacity upgrade and refurbishment**. The sewer network **is being extended** (contractor on site);

p.74 Kleinmond 4th bullet; change to: The solid waste **transfer station** at **Kleinmond has been repaired** and upgraded and has sufficient capacity;

p.76 Benguela Cove, last sentence: With the prolonged drought resulting in the low level of the municipality's dam at Fisherhaven, Benguela Cove requires alternative irrigation water. The supply of treated effluent from the Hawston WWTW for this purpose is being investigated;

p.78 Fisherhaven 3rd bullet: The limited sewer network in Fisherhaven is linked to the Hawston waste water treatment works via a pump station and rising main pipeline. The sewer network however need to be extended;

p.78, Hawston 3rd bullet: this comment is not valid. Hawston is supplied with water from the same sources and water treatment plant (Preekstoel) as the rest of the Greater Hermanus area. This comments applies to the entire area.

p.81, 84, 86, Hermanus last bullets: the solid waste transfer station is to be decommissioned, with new waste drop-off and recycling facilities to be developed at the Hermanus WWTW;

p.86 Hermanus East, 4th bullet: this comment is not valid. The area is served by the Hermanus Waste Water Treatment Works, which has adequate capacity for may years into the future;

p.81, 84, 86: additional bulk water sources will have to be developed in the medium term. A recent feasibility study indicated seawater desalination to be the preferred option;

p.89 Stanford 3rd bullet: the upgrade of the WWTW has been **completed**;

41/66

- p.92 De Kelders, last bullet should read: Gansbaai **landfill site**; not drop-off;
- p.95 Gansbaai, add: the Gansbaai solid waste landfill site has adequate capacity for the next 13 years;
- p.102 Baardskeerdersbos 2nd bullet: there is no existing WWTW to connect to. A sewer network and WWTW will have to be developed for the village;
- p.103 Buffeljagsbaai: the last sentence is not valid. The village is supplied with bulk water from a municipal bore hole into a reservoir and reticulation network. The raw water quality require some form of treatment in future.
In terms of waste water the village is served with conservancy tanks;
- p.120, LO1: add **WSDP** under "policies and key policy informants"?
- p.122, LO9: add **WSDP** under "policies and key policy informants"?
- p.128, EO7: add **WSDP** under "policies and key policy informants"?
- p.194-196: possible large scale seawater desalination plant for the Western Cape to be mentioned?
Refer to attached docs.
- p.206, (iv) and (v): Hermanus West should read Hermanus Central?
- p.208 (iv) and (v): Hermanus West should read Hermanus East?
- p.242, ESM1: BOCMA should read BGCMA, and DWA should read DWS;
- p.242, ESM2: Eng Services should be Eng Planning (i.e. for Water Demand Mgmt);
- p.248, SP15 and SP20: add Eng Planning under Other Role Players (water, waste);
- p.253 par. 7.5.3: (i) should read: **water and** waste water infrastructure;
- p.254, par. 7.5.4, is the shortfall not **56%** in stead of 39.9%?

Hoop bg. is relevant. Bespreek gerus as iets onduidelik is.

Groete
Hanre

Hanré Blignaut
Deputy Director: Engineering Planning
Overstrand Municipality
M: 082 497 9169 | T: 028 313 5047 | E: hbignaut@overstrand.gov.za

42/66

Rina van antwerp - Re: FW: BUILDING CONTROL COMMENT: SDF

From: Rina van antwerp
To: Jaco van Tonder
Subject: Re: FW: BUILDING CONTROL COMMENT: SDF

Click to add a signature

>>> Louis Coetzee 04/06/20 1:03 AM >>>

OVERSTRAND MUNICIPALITY DRAFT SPATIAL DEVELOPMENT FRAMEWORK: BUILDING CONTROL COMMENT

The (draft) Heritage Protection Overlay zones are supported by Building Control, particularly the protection and utilisation of heritage buildings in the Overstrand area. The Heritage Committee was also informed of the opportunity to comment and we hope they use this opportunity. In an unrelated SDF matter, the Building Control Department will greatly appreciate any guidance from the Town Planning Department regarding the implementation of the HPOZ approval/consent by Town Planning during the building plan evaluation process.

p245 "Property Development and Public-Private Partnerships" , "Encourage new development design concepts that incorporate natural areas in layouts and complement the natural environment by introducing eco-architecture/green building designs".

Building Control not only supports eco-architecture/green building design, but we also support eco-tourism. Eco architecture and green building design include pre-fabrication (also refer to <https://constructingexcellence.org.uk/rethinking-construction-the-egan-report>) as sustainable building practice and minimises the physical environmental footprint. The design process involves weighing pre-fabrication with local manufacturing and construction material suppliers.

At present, pre-fabrication (i.e. containers) is not popular with Building Control and Town Planning Departments: Building Control and Town Planning Departments need to be aware that pre-fabrication is a sustainable building practice, when assessing future building and Town Planning applications.

In conclusion, the Building Control Department supports the Draft Spacial Development Framework.

Louis Coetzee

Manager: Building Control

Directorate Infrastructure and Planning

Overstrand Municipality

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Comments on Overstrand Municipal draft Spatial Development Framework - 2020

by Giorgio Lombardi MSc,
Warden
Vogelgat Private Nature Reserve, Hermanus
20th February 2020

Thank you for giving me the opportunity to comment on the above document.

I draw your attention to the following:

Plan 3: Vogelgat Nature Reserve which abuts directly onto Fernkloof Nature Reserve has been left blank. We are in fact a stewardship contractual nature reserve with Cape Nature. I too notice that along the Klein River mountain NO conservancies have been added. Please consult the local Cape Nature office in this regard.

The Vogelgat river has not been added to the plan. It forms an important ecological system for the Klein River Estuary and should be added.

Plan 4: Notes as above for Vogelgat not represented. Area below R43 demeaned "area where no natural habitat remains" this is untrue, and the municipality is busy incorporating these erfen into Fernkloof Nature Reserve

Plan 5: Klein River conservancies not depicted.

Plan 6: Vogelgat Nature Reserve does not have to be included. It is already a stewardship contractual reserve. The entirety of Fernkloof Nature has not been included here especially the erfen from Prawn Flats to Maanschyndbaai.

Plan 7: Vogelgat again not depicted as a protected area and erfen of Fernkloof east of Prawn Flats not included as protected.

Plan 12: the protected areas as Fernkloof, Vogelgat and Maanschynekop Nature reserves serve as natural mountain catchment areas. This plan omits these.

Plan 14: Vogelgat River not represented here. It is an important river system for Vogelgat Nature Reserve and the Klein River estuary.

Plan 15: Klein River conservancies not depicted here.

Plan 16: The area east of Hermanus has not been depicted green for mountain catchment area.

Plan 17: once again Vogelgat not designated Protected area.

Plan 18: Walker Bay Nature Reserve depicted as marginal potential arable land. This area should be RED – Wilderness. As it is a provincial protected area. The areas below Fernkloof Nature Reserve,

Vogelgat and Maanschynkop Nature Reserve are not moderate potential arable land. These areas should be RED – Wilderness as the form part of proclaimed nature reserves.

Plan 29: I would suggest that town names be inserted so the reader does not have to guess where this plan is in relation to the whole.

Plan 31: The Vogelgat River should be incorporated as an ecological corridor i.e. mountain to estuary.

Fig 4.6: the whole of Fernkloof and Vogelgat Nature Reserve are omitted as protected areas.

Plan 40: I find the areas of Fernkloof and Vogelgat Nature Reserves very murky. These areas should stand out as protected areas only. EMOZ zone not included for these latter areas. Why is this?

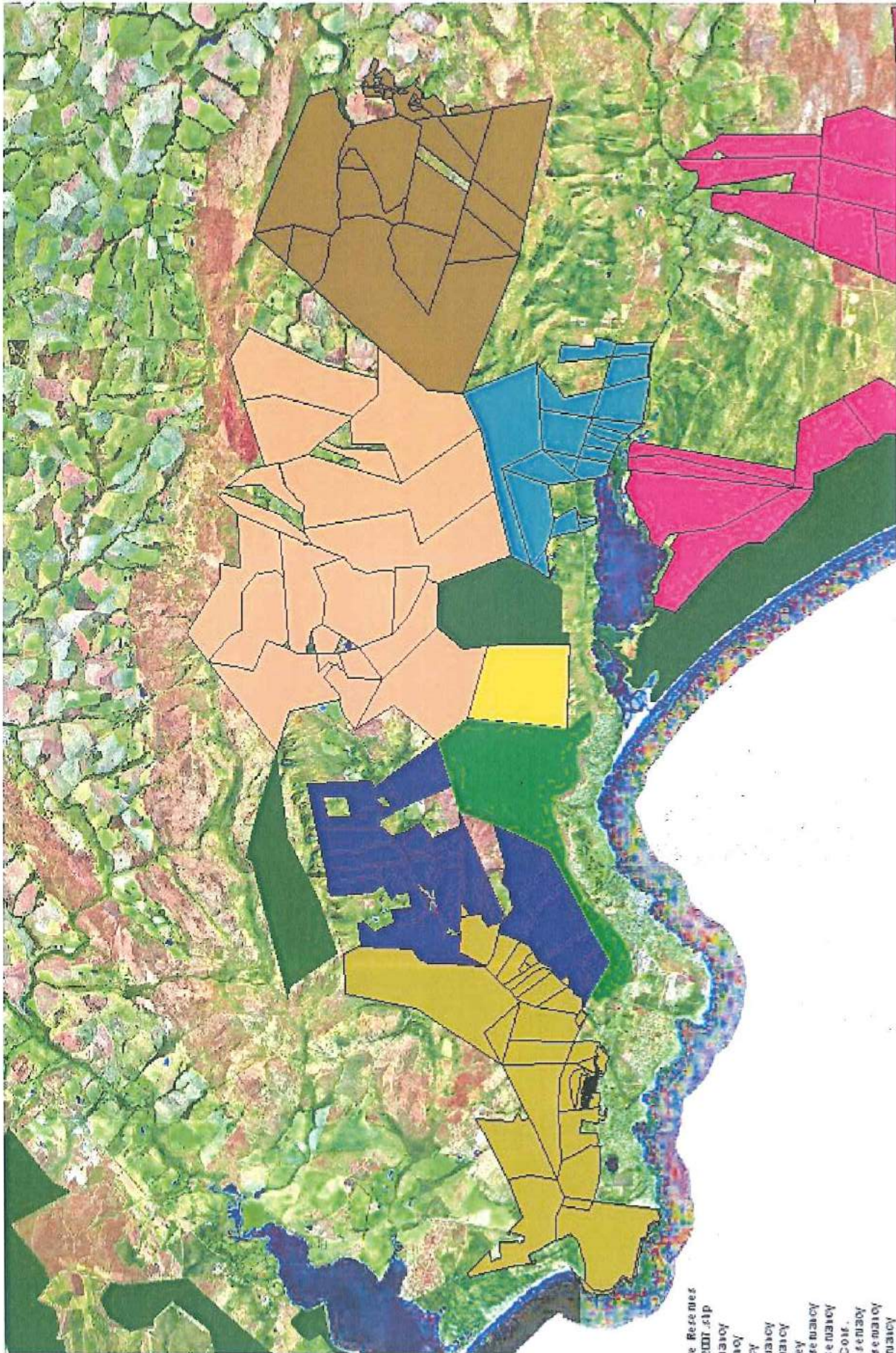
Plan 55: The Onrus lagoon is not depicted as a wetland nor an estuary. The urban edge is depicted encroaching into CBA zone. These should be removed.

Plan 56: I do not understand that Fernkloof Nature Reserve as a protected area does not go right to the urban edge? Please also include the latest erfen to be included into Fernkloof East as Protected areas of Prawn flats to Maanschynbaai. Vogelgat Nature Reserve has not been named on the plan as has Fernkloof Nature Reserve. It is imperative that the readers, developers realise that this area is a Stewardship contractual site. The Vogelgat River should be added as water course.

Plan 58: The area highlighted as 423.5ha in the Hemel n Aarde valley is Urban Development RDA. Surely this should be a sensitive development zone as a major river systems traverses through it and has an ancient peat land and associated wetland?

Plan 59: The Vogelgat River should be depicted as an ecological corridor.

Conservation areas: Hermanus-Stanford

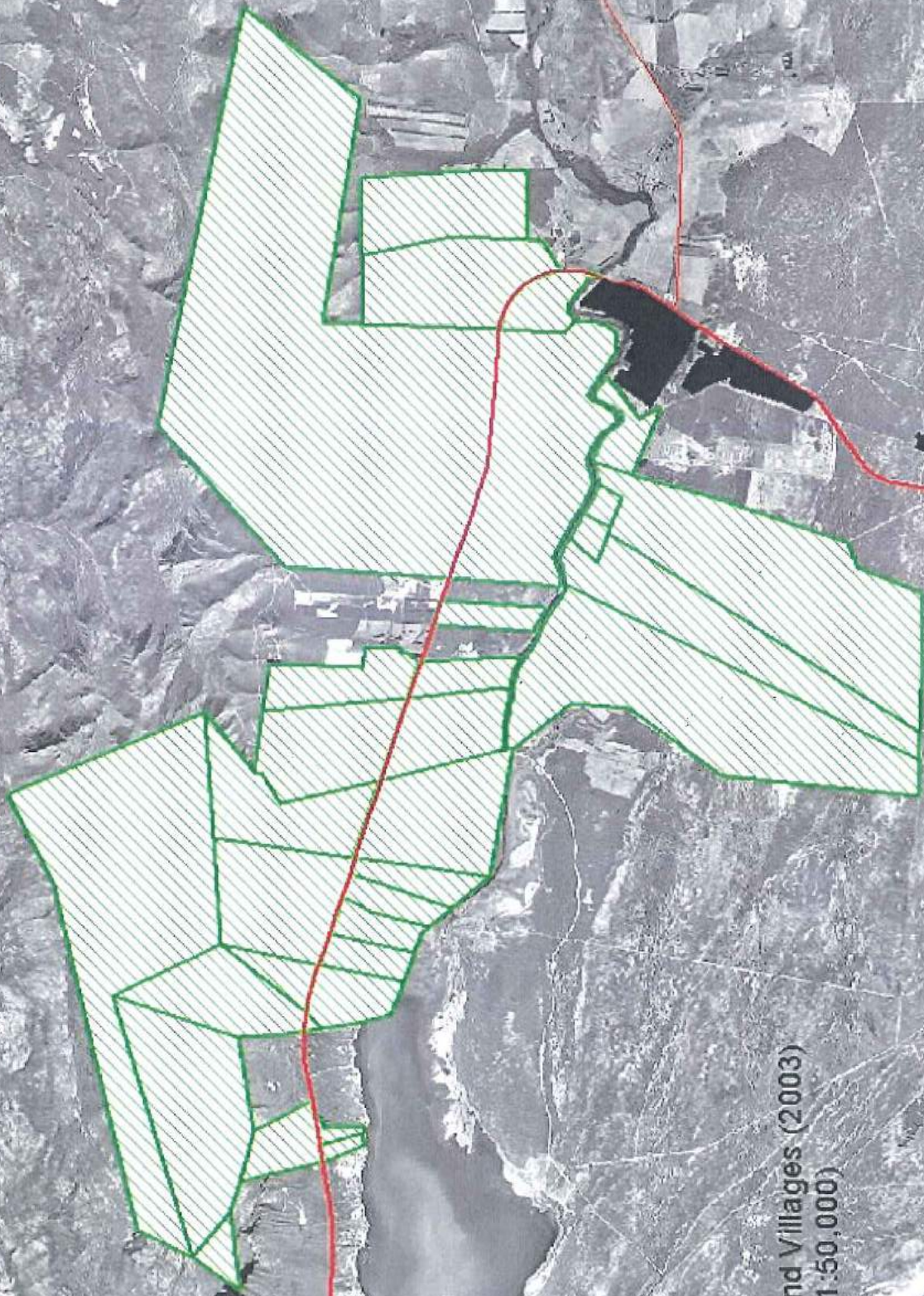


- Local Authority Reserves
- 0-1 Coarse marshes Nov 2007 .zip
- Skiddeberg Conservation
- Stinkwater Conservation
- Bambor Conservation
- De Diepgat Conservation
- De Leeuws Conservation
- Hemel en Aard Valley
- Ikke Swartberg Conservation
- Ikke Swartberg Conservation
- Lower Breede River Coast
- Mapak Hottel Conservation
- Ons Hottel Conservation
- Pearly Beach Conservation
- Sootie Conservation
- Walker Bay Pyro Conservation
- Exiting files - out the 19_1488eq12_2007 .zip
- Biodiversity
- Contract
- Voluntary
- CNC Reserves



Compiled by T. Hoekstra

KLEINRIVIERSBERG CONSERVANCY



- Towns and Villages (2003)
- Major Roads (1:50,000)
- Freeway
- National Arterial
- Main
- Kleinriviersberg5.shp

OVERSTRAND MUNICIPAL SPATIAL DEVELOPMENT FRAMEWORK (SDF):

PROVISIONAL COMMENTS BY THE BETTY'S BAY RATEPAYERS ASSOCIATION

1. Background

Comments on the SDF were invited and a public meeting was also held in Kleinmond on 20 February 2020. Comments have to be submitted by 7 April 2020. As no BBRA meeting could be held due to COVID-19 it is deemed necessary that at least some comments be submitted. The main document is very voluminous (the section dealing with Betty's Bay only starts on p 172) and requires more in-depth study.

2. Basic evaluation

A superficial reading is very positive of the status quo being maintained into the future (2050) and indicates nothing dramatic other than a proposed "New Urban Development" on a portion of land, 9,03 ha in extent, almost directly south-east of the present Mooiuitsig.

It is *inter alia* stated that the land area "is intended for higher density human settlement development, based on the housing need for Betty's Bay identified in the situational phase of the project".

A cross reference is then made to another section of the report (p 70 and 71) but no reference to such a "higher density" need could be found in that referred to section.

It may be that this area of land is envisaged as an extension of Mooiuitsig, which one could not object to, except:

- That no need for such land and higher density was motivated in the report;
- That a large part of the said land may, from an environmental point e g fauna and flora and in particular potential wetlands, be unsuitable for higher density development;
- That on p 70 of the report there are serious concerns regarding the adequacy of proper roads, sewerage, storm water and ESKOM which all militate against any proposed higher density development;
- That although the water network provision is allegedly "adequately supplied" it is a known fact that it is not the case and the proof thereof

can be found in the Municipality's planned water network upgrading but which upgrading had to be provisionally abandoned due to problems with the service provider and the contract having to be cancelled;

- That the statement that "solid waste is sufficiently managed by means of waste drop-off facilities" is also incorrect as the drop off facility in Betty's Bay adjacent to the municipal library is apparently in the process of being closed down.

3. Environmental matters

As indicated above, it is deemed advisable that a proper environmental study of the portion of land be carried out prior to it being identified as a "higher density new urban development".

A superficial evaluation indicates that a large portion of the identified land may be part of a wetland and also contain rare/endangered site-specific flora. It must be noted that the draft SDF itself in various places acknowledges the existence and importance of wetlands (p70) and the inclusion of natural and heritage features in both the draft EMOZ and HPOZ. Refer also to the promoting, restricting, maintaining and containing principles in par 5.4.2.1 on p 172.

On p 174 it is suggested that "The unique sense of place should be maintained by implementation of the Draft HPOZ and EMOZ regulations" – a statement that is supported.

Due to time constraints caused by the COVID-19 disaster it was not possible to do such an environmental analysis and it may be prudent to withhold any decisions until such time as this has been done. To this end a postponement would, in the light of the State of Disaster, be warranted and justified.

4. Recommended:

That the Municipality be informed of the above comments and an extension of time for more detailed comments and for an on-site environmental investigation of the site, be requested.

MEMORANDUM

Date : 23 January 2019

To: Haneen van der Stoep (Town Planning)

From: Penelope Aplon (Environmental Management)

RE: **Initial comments on Draft SDF**

The Environmental Section has the following initial comments on the draft SDF:

Pg 9: word omitted after prestine under point 1, third box.

Pg 13: Incorrect description of the CML process: DEA&DP managed the project for the development of coastal management lines. As part of this process, the coastal protection zone was identified. This zone was included as a the draft Coastal Protection EMOZ.

Pg. 18: Blue insert: Symbol for square meters not displayed correctly.

Pg 37: paragraph 1: As a result OF its..

Pg 37: Please include Fernkloof Nature reserve in second paragraph.

Pg 37: Symbol for cubic metrers not displaying correctly in 6th paragraph.

General comment on maps:

- The area covered by Fernkloof Nature reserve is incorrect. Please onbtain correct reserve boundary from Tarron Dry.
- Vogelgat Private Nature Reserve is not indicated on the maps:
- Please ensure legend does not overlap with map.
- Please ensure that the maps included are the same as the ones in the draft EMOZ document, there are slight differences.
- Kleinmond Coastal Nature Reserve not shown (Protected Area) or is it too small to see?

Pg. 48: Please ensure that EMPZ document is on municipal website. Link does not navigate to document.

Pg. 74: Solid waste dropp-off for Kleinmond has been upgraded

Pg. 78: Under Hawston, typing error for Paddavlei.

Pg: 174: Section on Kleinmond

Mention Bot-Kleinmond declared Ramsar wetland(2017)? In the Top 10 Most Important Estuaries in South Africa due to its size, habitat importance, zonal type rarity and biodiversity.

Pg: 176: Check spelling under Maintain heading: Overlay and Palmiet

Pg. 182: Under promote heading:

Bot-Kleinmond Lagoon is declared Ramsar Wetland (see <https://rsis.ramsar.org/ris/2291> and an Important Bird and Biodiversity area (IBA) is a draw card for tourism.

Pg. 185: Insert on map:

Mention Bot-Kleinmond declared Ramsar wetland(2017)? In the Top 10 Most Important Estuaries in South Africa due to its size, habitat importance, zonal type, rarity and biodiversity.

Pg. 187 Map:

Whole lagoon is Protected Area Ramsar

Pg. 188: Under promote heading

There is no Botrivier Nature Reserve it should be Rooisand Nature Reserve.

Pg. 190:

Include Ramsar wetland under number (v)

Kind regards,



Public Comment:Draft Spatial Development Framework.

1)

Page 12

Policy, Principles and Objectives:**4. Western Cape Biodiversity Framework (2017)**

You indicate: *The WCBSF replaces the Western Cape Biodiversity Framework of 2014.*

You need to change the heading then to Western Cape Biodiversity Sector Plan 2017?

2)

5. Implications:

The PLTF advocates integrated economic development, land use and transport planning, rather than hierarchy of plans that "lead" or "follow". This is a principle informant to the OMSDF.

- a) Please explain what this means?
- b) Can the Critical Biodiversity Areas be reviewed or changed as a consequence of the implementation of the OMSDF?

3)

Page 83:

*"The Hermanus CBD is a relatively confined area with mixed business related land uses on mainly a small scale. The relatively recent development of two large regional and sub-regional retail centres **did not seem to have had a deteriorating effect on either the CBD function in terms of economy, nor on its role of providing a quality urban environment"***

The statement above is not a true reflection of the facts. The Whale Coast Mall has had a devastating impact on the CBD and many shops have closed down, well before the current Covid dilemma began.

The reality is that the quality and caliber of shops is already deteriorating to the inevitable CHINESE JUNK shops. These businesses offer cash in advance for protracted periods, to desperate business property owners. The other shop owners are now surrounded by Chinese shops selling inferior goods. This is a trend throughout the coastal towns along the garden route. Visit Knysna, visit Plett, the central CBD's in these popular towns are awful, downgraded and struggling property owners are desperate. These are direct consequences of the establishment of large shopping malls featuring a blanket predictable mix of retailers, all the big guns. Destroyed many small and medium business.

4)

Page 83

Correction: Hoy's Koppie NOT 'Hoyts Koppie.'

'Two ecological corridors have been identified and mapped during the exercise of delineating the draft Overstrand Overlay Zones. The first is a corridor that links the CBD to Hoyt's Koppie and the second a strong link between the mountainous areas and the coastline the latter also integrates the said natural areas with the Fernkloof Nature to the east (refer Plan 30).'

The above statement does not make sense, grammatically or otherwise. There is no 'ecological corridor' BETWEEN the CBD and Hoys' Koppie.

If there is it must be the pavement gardens in the church parking area?? I would like to visit this corridor.

Please advise what the second ecological corridor is, as the sentence is not clear.

5)

Page 86

Gansbaai is not +- 25km from Hermanus, it is in fact 43 kms apart.

'networks in the older Hermanus East areas such as Vo Iklip' should read Voelklip.

6)

Page 122

iii. "Foreign or unsympathetic styles of site layout and buildings should be discouraged in urban settlements and rural areas as to strengthen the local sense of place and minimise visual impact."

This statement suggests that there is an element of control or assessment by a qualified expert who can determine the meaning of 'unsympathetic.' Please indicate how this can be carried out and what line of command would/should follow through on this aspect?

7)

Page 131

'vi. Where development is considered in an area / location regarded as visually sensitive, a visual impact assessment should be conducted to protect its significant sense of place characteristics'

What line of command is responsible for 'protecting sense of place characteristics? How is this considered by community representation?

8)

Page 135

'v. Manage the location and design of large scale retail facilities to enhance the viability and vibrancy of existing centres, as opposed to creating satellite retail centres that duplicate existing urban and rural centre functions to the detriment of the latter.'

'vi. Encourage and facilitate urban regeneration and restoration of under-utilised or decayed existing centres. Refer Overstrand Growth Management Strategy'

Both the above points suggest a conflict with a previous comment regarding the large mall having had no impact on the CBD? How can this be a consideration, only once the horse has bolted?

9)

Page 154

'4.3.6 Priority Areas for Biodiversity Conservation Strategy: All public owned land (including State property, Municipal and Provincial property) that is of high conservation importance is to be included in a formal municipal protection area network. The mechanisms being to establishing contract nature reserves negotiated in conjunction with the WCNCB conservation stewardship programme, providing legally bounding guidelines for land use. The objective of this strategy is to ensure that a broader formal conservation strategy is implemented for all public owned land within the Municipal area. Private land owners should also be encouraged to join the stewardship programme, in order to conserve land identified as being critical for biodiversity conservation in perpetuity. The draft Environmental Overlay Zone regulations, in the process of being promulgated, should be noted as a mechanism with similar objectives and once implemented, this strategy of the MSDP should be considered to be revised / integrated with the EMOZ regulation provisions.'

How does the above statement impact on the current functioning and future protection of Fernkloof Nature Reserve?

Please provide me with an email response to my comments.

Please confirm receipt of this email,

Many thanks

Pat Redford

0829084002

patred@iafrica.com

Erf 1580

OVERSTRAND MUNICIPAL SPATIAL DEVELOPMENT FRAMEWORK (SDF):

PROVISIONAL COMMENTS BY - KOGELBERG BIOSPHERE RESERVE COMPANY (KBRC)

1. Background

It is assumed that public comments on the SDF were invited. As far we are aware, the KBRC was not explicitly requested to comment. Overstrand Municipality (OM) regularly **require that private developments must consult the KBRC apart from advertising it a local newspaper** and placing proposals at the library. Because the SDF is a matter the KBRC concerned and the OM sit on our Management Committee we would have like to have been specifically notified.

I will comment direct on extracts out of the SDF document. The extracts will be of important requirements, finding and proposals of a SDF. Extracts are given in **BLACK** with headings and wording emphasised or referred to in **bold** and my inputs in **BLUE**.

2. Comments.

Part 1: Introduction

1.1 BACKGROUND

The terms of reference of the SDF is "To update and merge the MSDF (2006) with the Overstrand Integrated Development Framework (IDF: 2014) and the Overstrand Strategic Environmental Management Framework (EMF: 2014)

1.3 PURPOSE OF A MUNICIPAL SPATIAL DEVELOPMENT FRAMEWORK - The Municipal Spatial Development Framework is a sectoral component of the IDP that, in terms of the MSA, is aimed at providing general direction to guide decision making on an ongoing basis, aiming at the creation of integrated, sustainable and habitable regions, cities, towns and residential areas

1.4 KEY STATUTORY REQUIREMENTS

In this regard, Section 21 of the Spatial Planning and Land Use Management Act, 2013 (Act No. 16 of 2013) and Chapter 3 of the Western Cape Land Use Planning Act, 2014 (Act No. 3 of 2014) stipulates the aforementioned content requirements.

- include estimates for the **demand of housing units and the planned location** and density of future housing developments;
- include a **strategic assessment of the environmental pressures and opportunities** (incl. spatial location of environmental sensitivities, high potential agricultural land and coastal strips);
- identify areas in which **more detailed local plans must be developed** and shortened land use procedures may be applicable;
- provide **spatial expression of integration** of municipal sectoral policies;

SPLUMA Principles and Related Aspects

SPATIAL SUSTAINABILITY - Environment Indicate **how sprawl will be curbed** and prime agricultural land protected. Indicate environmental sensitive areas, nature reserves, cultural zones and its status

EFFICIENCY - Indicate how the **use and innovation of green technology, alternative forms of energy and infrastructure will be optimised**. Settlements Indicate a balanced variety of land uses, businesses, education, and entertainment that are supportive of each other and well integrated. Indicate and identify areas for compaction and intensification such as corridors, nodes and TODs in order to promote compact cities which allows for more affordable and efficient infrastructure development and public transport.

SPATIAL RESILIENCE - Identify and **prioritise areas most vulnerable** to possible disasters, e.g. flood plains. Promote long term spatial planning that monitors future trends and forecasting of possible disasters and the possible impacts and target areas of disasters.

GOOD ADMINISTRATION - Provide **proof that an integrated intergovernmental planning and consultation process** outcome was achieved.

Part 2: The Overstrand Municipal Area

2.3 STATUTORY POLICY CONTEXT

A Synthesis of Key Relevant Policies at National, Provincial, and Regional Level is given and Policy, Principles and objectives and Focus implications for Overstrand SDF are given:

4. National Freshwater Ecosystem Priority Areas (2011)

POLICY - The National Freshwater Ecosystem Priority Areas (NFEPA) map provides strategic spatial priorities for conserving South Africa's aquatic ecosystems and supporting sustainable use of water resources. FEPAs were identified based on a range of criteria dealing with the maintenance of key ecological processes and the conservation of ecosystem types and species associated with rivers, wetlands and estuaries.

PRINCIPLES AND OBJECTIVES - The NFEPA project is a multi-partner project which aims to: Identify Freshwater Ecosystem Priority Areas (FEPAs) to meet national biodiversity goals for freshwater ecosystems; and develop a basis for enabling effective implementation of measures to protect FEPAs, including free flowing rivers.

FOCUS IMPLICATIONS FOR OVERSTRAND SDF - FEPA data included in the MSDF will inform the ecological assessment in land use decisions, on various scales and in various sectors, through illustrated and described priority areas. Land use planning within the MSDF should be consistent with the objectives of FEPAs.

5. National Biodiversity Assessment (2011)

POLICY - This report assesses the state of South Africa's biodiversity and ecosystems, across terrestrial, freshwater, estuarine and marine environments, with an emphasis on giving spatial information where possible, especially about ecosystems.

PRINCIPLES AND OBJECTIVES - It provides a mechanism for synthesising key aspects of South Africa's excellent biodiversity science and making it available to policymakers, decision-makers and practitioners in a range of sectors. It provides a spatial picture of the location of South Africa's threatened and under-protected ecosystems, and focuses attention on geographic priority areas for biodiversity conservation.

FOCUS IMPLICATIONS FOR OVERSTRAND SDF - Overstrand has a **high level of alien invasive plant species** especially along river banks. This leads to further degradation of aquatic systems which impacts on the water quality and quantity available in the region. **OM has a high level of alien invasive trees over large areas, including land that the OM own such as reserves, parks and open space where AI-trees have not been controlled for years.** The SDF should include a map indicating density and species in these areas and require that an alien invasive plant (AI) Eradication Plan must be compiled and funds made available in the IDP for the mapping, Eradication Plan and Eradication work.

4. Western Cape Biodiversity Framework (2017)

POLICY - The Western Cape Biodiversity Sector Plan (WCBSP) illustrates vicinities of biodiversity that are significant throughout the Western Cape. The data covers major coastal and estuarine habitats as well as terrestrial and freshwater realms respectively.

PRINCIPLES AND OBJECTIVES - The focus of the framework is to **identify Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) which are areas required to meet biodiversity targets for ecosystems, species and ecological processes.** Emphasis is placed on the spatial implications for development and conservation. In order for an MSDF to aid in reaching biodiversity targets and indirectly maintain or improve human well-being, it needs to consider the WCBSF information in its spatial planning.

FOCUS IMPLICATIONS FOR OVERSTRAND SDF - The OMSDF is informed by the WCBSF data sets in its status quo plans, and the said data informed various earlier sources that are cornerstones of the MSDF proposals. **The MSDF is therefore entirely consistent with the provisions of the WCBSF.**

2.4 OUR PEOPLE

It appears that there is a particular demand for housing from middle-income wage earners, earning more than the minimum salary of R3 500 per month, who are excluded from state housing programmes and are forced to live in backyard dwellings. Overcrowding and living in backyards increases the strain of living in limited spaces, and thus the demand for access to vacant land to erect their own structures.

2.4.12 Land Area Requirements based on Housing Need

The following tables present the amount of land (ha) required to accommodate the housing need as per the preceding section. The land area calculation are based on two scenario's, namely at a density provision of 15du/ha as well as 20 du/ha.

Hangklip/Kleinmond needs in 2021 is calculated to be 1 566du requiring 104ha of land at a density of 20du/ha (Thus 500m²/du)

Hankklip/Kleinmond does nor has large areas of suitable land/space available. The SDF should investigate how does a allocation of 20du/ha compare with high density housing in developed counties? Creative ways must be sought to provide and upgrade the housing while reducing the land surface required for housing.

Note that the **SPLUMA Principles of spatial sustainability** under the point, Environment require that the SDF must indicate **how sprawl will be curbed.**

2.5 OUR ECONOMY

Overstrands' average **Total economic growth in GVA is 2.9%**. The average GVA of primary sector industries of agriculture, forestry and fishing are contracting (-1.1% and -1.7%, respectively) and tourism will contract substantially as result of the lockdown. With an average **Total growth in GVA of 2.9% the economy has thus contracted in real terms.**

The Overstrand should take into account and must make people moving in the area aware of the fact that the economy has been contracting over time and that will do so in future.

The SPLUMA Principles of spatial sustainability under the point, EFFICIENCY, requires that the SDF **indicate how the use and innovation of green technology, alternative forms of energy and infrastructure will be optimised.** In the absence of projects on the ground, policy changes that provide incentives to promote such projects should be called for. **Policy** encouraging individual residents and developers in the OM to use Solar Panels as an example will stimulate the industry.

Challenges and Impacts / Implications for Economy is this MSDF

The **Overstrand's economy and ecology are inseparable and the natural environment is widely regarded as the region's single largest asset.** The future management of the natural resource base and the subsequent state thereof, will to a great extent influence economic sustainability. If resources are not effectively managed, the resource base may limit economic growth. Effective integrated environmental management is required to ensure a sustainable balance between the Overstrand economy and ecology.

2.6 OUR NATURAL ENVIRONMENT

Specific most pertinent challenges impacts on the Overstrand rural and natural environments according to the Overstrand EMF, 2014 are:

The **infestation of invasive alien plants** that (i) **dramatically decreases water quantity from mountain catchment areas.** (ii) **It suppresses and overgrows indigenous vegetation that negatively affects the scenic quality of the natural environment** and (iii) **increases the frequency and intensity of fires.**

A number of factors increasingly impact on natural vegetation including the invasion of alien vegetation, an increase in agricultural activities, reduced rainfall and changes in land use to accommodate housing and infrastructure development. Plan 7 spatially illustrates the current land cover of the Overberg Municipality's rural environment. This land cover transformation plan depicts naturally vegetated areas, degraded sites, densely alien infested areas, and urban built-up areas.

A decrease in quantity of freshwater inflows into reservoirs and recharging of aquifer systems, may compromise adequate potable water supplies to the towns within the Overstrand region. The quality and quantity of freshwater inflows into estuarine ecosystems are declining as the result of various factors, which will lead to the gradual transformation thereof into fresh water lakes. This in itself is a significant disturbance of the natural environmental balance of the area.

Suggested priority projects that give address these challenges are:

1. The SDF should mention that lack of a map indicating the density and species of alien invasive in the Kogelberg portion of the area and on OM owned land and that such a map should be compiled and made available.

2. OM should take the responsibility for the cost of catchment management in the catchments area of the boreholes they abstract water from and catchments of dams that currently supply water to the OM irrespective of the ownership of the land.

3. Scientific studies in the Fynbos region (see attached review articles) show that the most important manageable fire risk is the **presence of dense stands of fast and high growing Alien Invasive trees**. The second is the **veld age older than 12-15 years** (at this point some short-lived plants may start dying off). Likewise the greatest threat to Biodiversity in the Fynbos region is **Alien Invasive (AI) trees** while **Fynbos is a fire driven vegetation**.

The approach to fire must shift from preventing, fighting all fires to managing fires because prevention of all fire has led to increased veld age and fire risk, especially near residential areas. The perception that fire and conservation is or has to be in conflict is therefore incorrect. In fact, controlling if **Alien Invasive** trees and managing fire have been a conservation functions for decades. **The largest challenges for managers are integrating fire management with invasive alien plant management.**

Managing fire require that it is done according to a proper Fire Management Plan (FMP) that take account of season, fire temperatures, veld age, veld type, infrastructure, cooperation with neighbours, monitoring, ect. The absence of a FMP makes accountability and continual improvement impossible. **A FMP must be an integrated plan i.e. eradication of AI trees is as much the Fire Departments job as that of conservation. Provision should be made for such plan in the SDF and IDP.** The SDF/IDP should mention that lack of an Invasive Alien Tree Control Plan and Fire Management Plan hinder work efficiently and monitoring of staff and contractors.

4. Spatial information about the density and species in a useful format it can be used by the public, education, Botsoc's hacking teams and others. **It is recommend** that the information that the OM has should be made available to ARC at Elsenburg and/or SANBI. They will make it available to all and the information will be used in the interest of people and the environment.

2.7.4 Rural Settlements

2.7.5 Urban Nodes

BB RE and PB are already inappropriately spread out along more than 20km. A large number of plots in BB, RE and PB should never have been developed and can today be serviced at very high cost (we can blame it on thoughtless planning of the past). The residential plot in the wetlands that are filled up with building rubble and plots and roads in a transgressive dune field that are covered with sand in the BB main beach area can attest to this.

The density of future housing developments and the location thereof should be based on the actual environmental, special and economic constraints and realities.

The **Spatial Sustainability** aim of SPLUMA and is to minimize "Urban Sprawl " and **peripheral, segregated development in favour of inclusive integrated development.**

Rooiels (RE)

The town was surveyed in terms of availability of vacant land in 2019, and a total of 58 vacant residential erven were identified. A total amount of 295 additional people will need to be accommodated from 2019 to 2031. Based on an average household size of 2.6 persons per household, this amounts to a total requirement of 113 additional dwelling units by 2031. When the aforementioned existing amount of available erven for residential development is compared to the amount of additional dwelling units, it is evident that a shortage of approximately 55 dwelling units will be required by 2031.

No densification is proposed for Rooiels in terms of the Overstrand Growth Management Strategy. Therefore the shortage of 55 dwelling units will either have to be accommodated by means of secondary dwelling units on existing erven or a maximum of approximately 55 additional erven will be required.

Pringle Bay (PB)

Due to the excessive amount of vacant residential zoned land in Pringle Bay **no densification will be required by 2031.**

Betty's Bay (BB)

Almost half of the erven zoned for residential use are currently vacant. The town was surveyed in terms of availability of vacant land in 2019, and a total of 856 vacant residential erven were identified. A total amount of 417 additional people will need to be accommodated from 2019 to 2031. Based on an average household size of 2.6 persons per household, this amounts to a total requirement of 160 additional dwelling units by 2031. When the aforementioned existing amount of available erven for residential development is compared to the amount of additional dwelling units required, it is evident that a significant excess of residential developable land will be available **by 2031** (sufficient land area to develop a **surplus of approximately 696 dwelling units**).

Finding: Due to the excessive amount of vacant residential zoned land in Betty's Bay no densification will be required by 2031.

The portion of land 9,03 ha in extent indicated on Plan 45 state that the land is intended for higher density human settlement development. This recommended development is inconsistent with the final finding of the assessment (see above) and does not explain **why this particular area is the priority spatial location** or argue merits / demerits of **development outside urban edge**.

All the information and rules in this SDF as well as the Overstrand EMF clearly identify this area as a "no go" area for the following reasons:

- The proposed site falls outside of the current approved Urban Edge. The urban edge had to be amended to include the area.
- The proposed site is part of the Buffer area of the Kogelberg Biosphere Reserve. See Plan 16 below.
- National Freshwater Ecosystem Priority Areas (NFEPA) map and FEPA data must be included in the MSDF to inform the ecological assessment in land use decisions. Point 2.3 above state that "Land use planning within the MSDF should be consistent with the objectives

of FEPAs." Map 3 above shows National Freshwater Ecosystem Priority Areas (NFEPAs) map indicating the area fall in FEPA wetland in FEPA River.

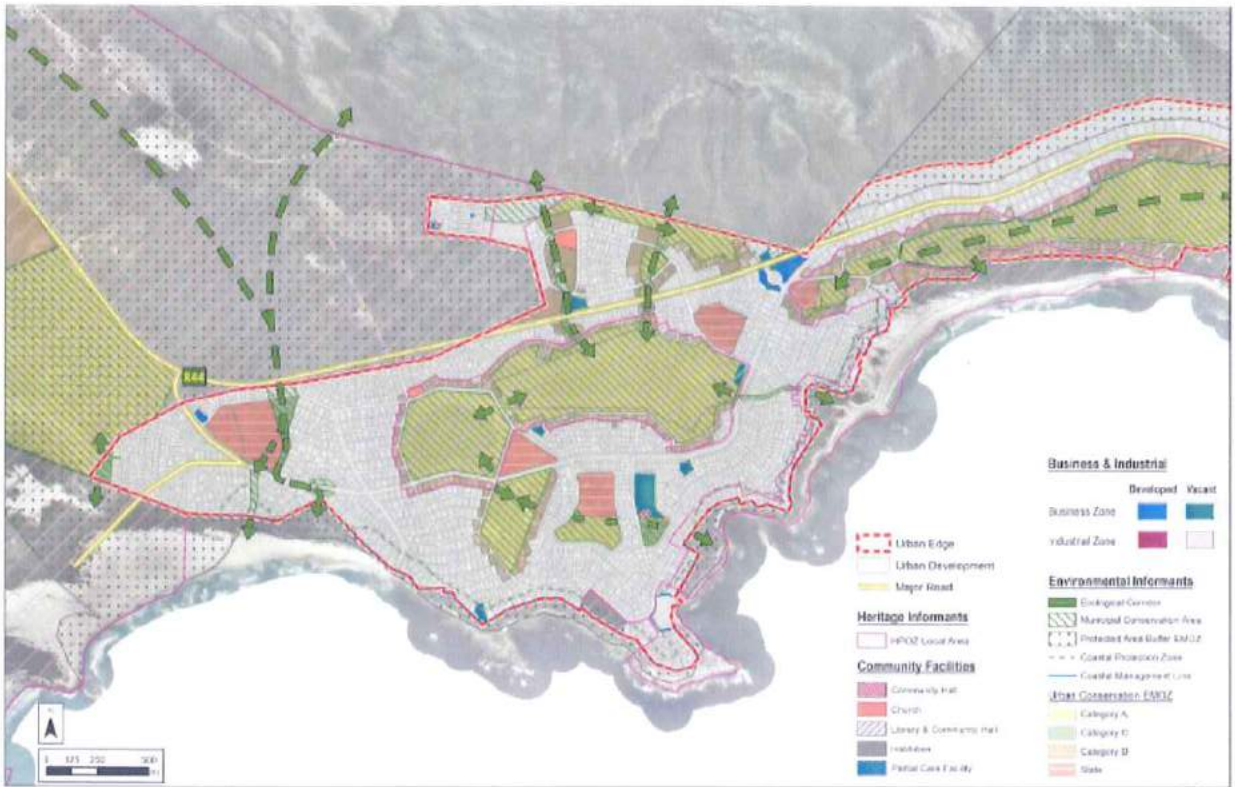
- The proposed site is a Threatened Ecosystem and classified as Critically Endangered. See Plan 4 of SDF below.
- The proposed site is classified as a Critical Biodiversity Area. See Plan 5 below.
- The proposed site is along a identified Important Scenic Route (Plan 40) and the SDF state on p 174 that "The unique sense of place should be maintained by implementation of the Draft HPOZ and EMOZ regulations" .
- The finding in the SDF for Betty's bay rural settlement report state "**Due to the excessive amount of vacant residential zoned land in Betty's Bay no densification will be required by 2031**". This proposal is therefore contrary to the final finding and seems to be irrational.

All the above views of the SDF report are supported by the KBRC. The KBRC further support the final point in the summary of Point 2.3 under the heading, Our Economy, that the main challenge of the MSDF is, "***The Overstrand's economy and ecology are inseparable and the natural environment is widely regarded as the region's single largest asset. The future management of the natural resource base and the subsequent state thereof, will to a great extent influence economic sustainability. If resources are not effectively managed, the resource base may limit economic growth. Effective integrated environmental management is required to ensure a sustainable balance between the Overstrand economy and ecology.***"

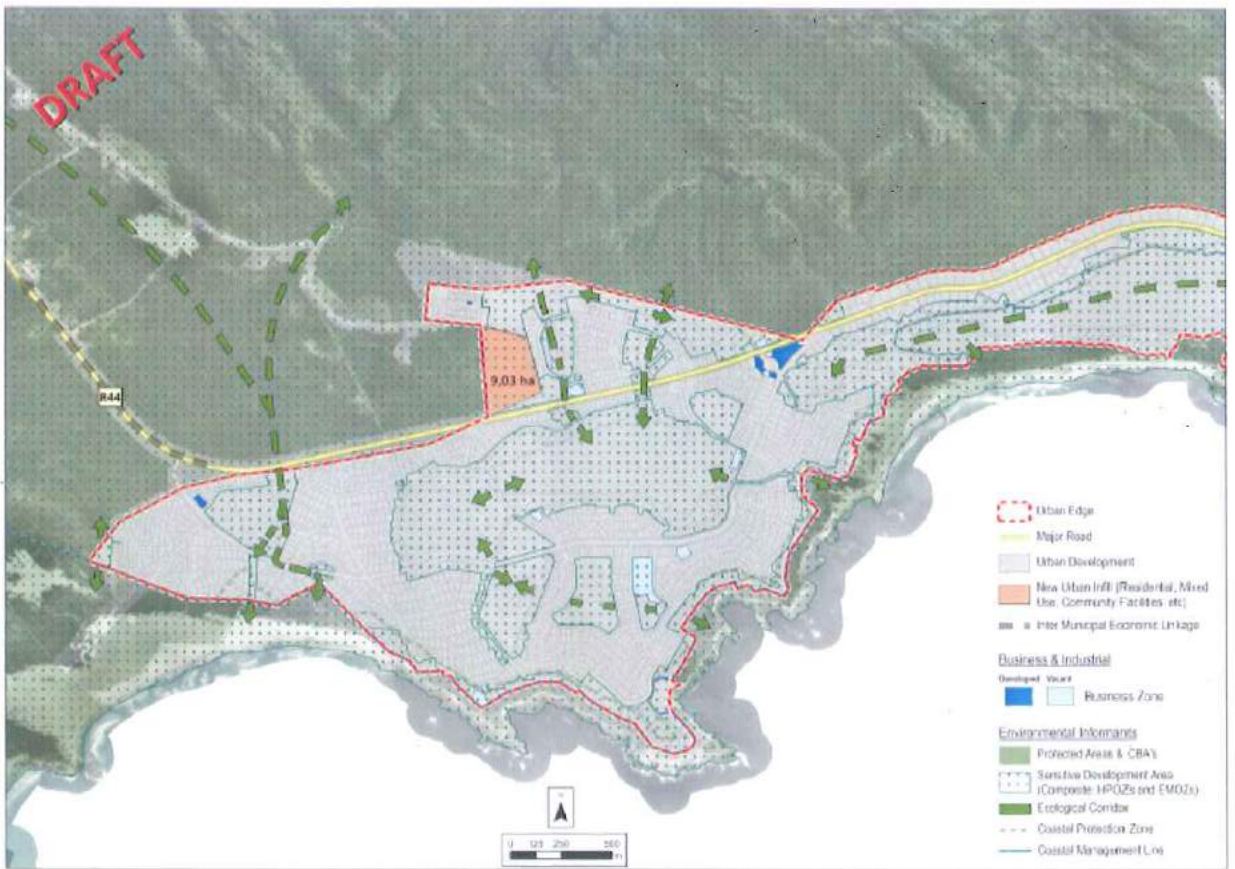
Updating the SDF should not be used to shortcut to add land for development and move the urban edge without any consultation or an assessment.

A scoping study evaluating different alternatives and public consultation should have been carried out prior to the proposed site being identified and included in a SDF for approval. **Therefore the proposed site should be removed from the map (Plan 45) in the SDF.**

The SDF state that "the settlement is not adequately serviced by stormwater infrastructure" is agreed with. Such **infrastructure** however seems to drain wetlands and canalise the watercourses indicated on this map (an activity that is probably unlawful). The lack of an understanding of the surface water and wetland dynamics will cause that any **stormwater infrastructure** construct by the OM may cause unknown environmental damage. All new development on roads, existing- or vacant erven will add to this problem and it is imperative that stormwater infrastructure should be guided by a study to understand the wetlands, infrastructure and stormwater dynamics.



Plan 24: Betty's Bay West Status Quo



Plan 45: Betty's Bay West Spatial Proposal 2020

2.8 OUR FACILITIES

Three (3) additional Primary schools are proposed for BB according to the SDF.

Primary schools for BB, RE and PB has a Population Threshold of 1000.

The Population Threshold for a Primary school is 7000 in the rest of OM. This threshold amounts to one (1) Primary school estimated provision for Kleinmond.

Correct this irrational proposal in the SDF as limited funds should be used at priority locations.

Level surface playing field x 2 plus Single hard surface court x 2 plus Neighbourhood park (with Equip.) x 2 has been identified for BB according to the SDF at total provision for these facilities approx. 0.56 ha per 1000 people.

While the Population Threshold for a Level surface playing field and Neighbourhood park (with Equip.) are 3000 in the rest of OM.

BB PB and RE that has relatively large erven, has large open areas for hiking, water bodies and the sea for swimming rowing and fishing the **threshold level is 1000**. A high proportion of permanent residence in BB is older and/or without children and additional land suitable for development scarce, as it already overdeveloped. Better use for land and funding elsewhere seems to be obvious.

Correct this irrational proposal in the SDF as the funds should be used at priority locations.

2.7.4 Rural Settlements

2.7.5 Urban Nodes

Kleinmond (KM)

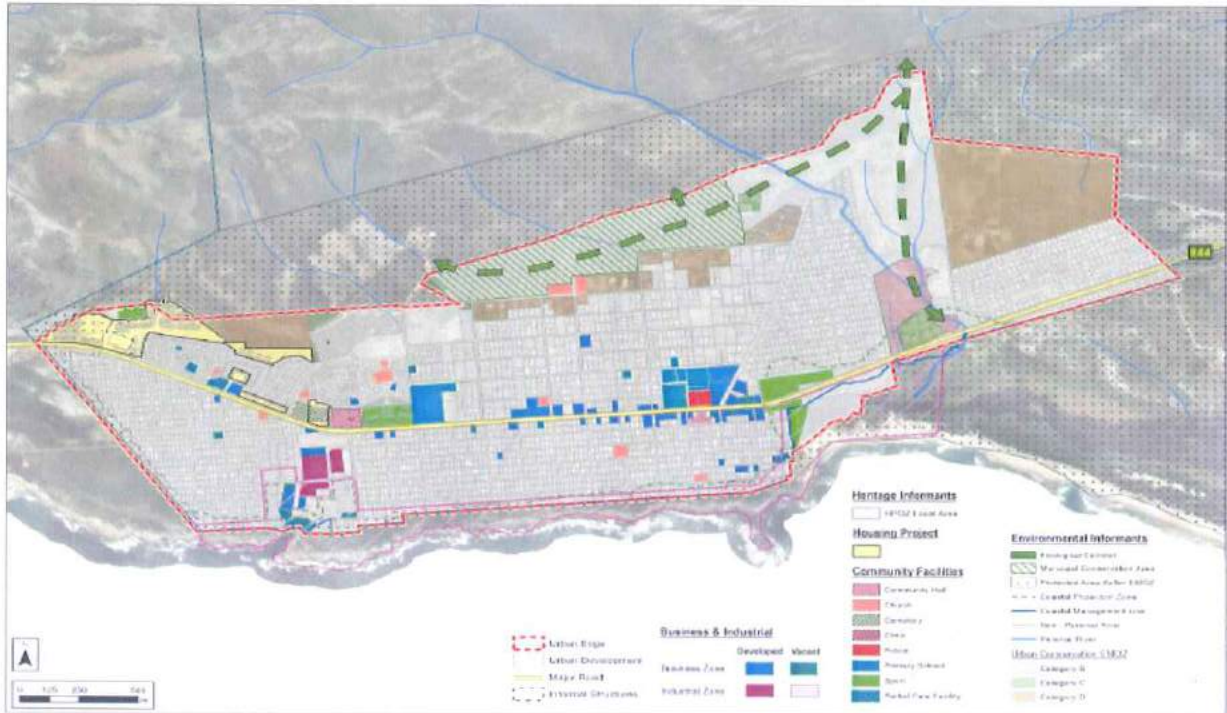
As illustrated in Plan 24 an informal settlement is located in the area north of the R44 at the western most periphery of the town. The housing need for the indigent and estimated percentage annual growth in Kleinmond is presented in detail in Sections 2.4.11 and 2.4.12 of this report. The Hangklip – Kleinmond area had a total housing need ranging from 855du in 2011, 1 178 in 2016 which has been projected to increase to 2 468du by 2031 (Refer Section 2.4.11).

This translates to a **total required housing land area of ±65ha by 2031 when the density of 20du/ha is applied. Kleinmond boasts of a substantial housing project currently underway.**

The final recommendation after the assessment of the housing requirements in Kleimond (above) indicate that an additional area in extent of 65ha should be made available for higher density human settlement, Plan 49 below for Kleinmond does not seem to show any additional land proposed for residential development. If so, it is inconsistent with the final finding of the assessment (see above) especially since the report state that the "**Kleinmond boasts of a substantial housing project currently underway**".

At a public meeting that I attended a few months ago, the OM said that no land has been identified for housing development but that they embarking on a survey to determine the

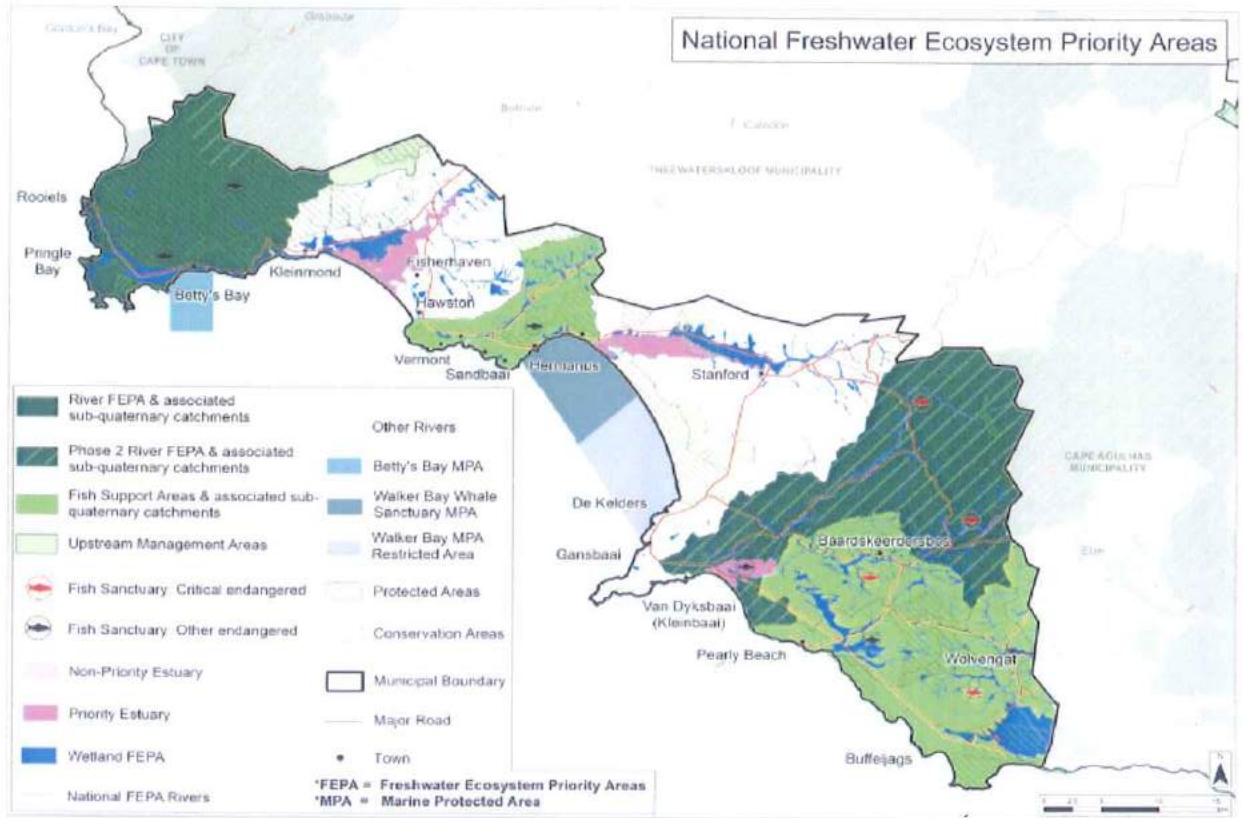
community needs that may have a spatial footprint. Nothing was heard of the progress or findings of the survey.



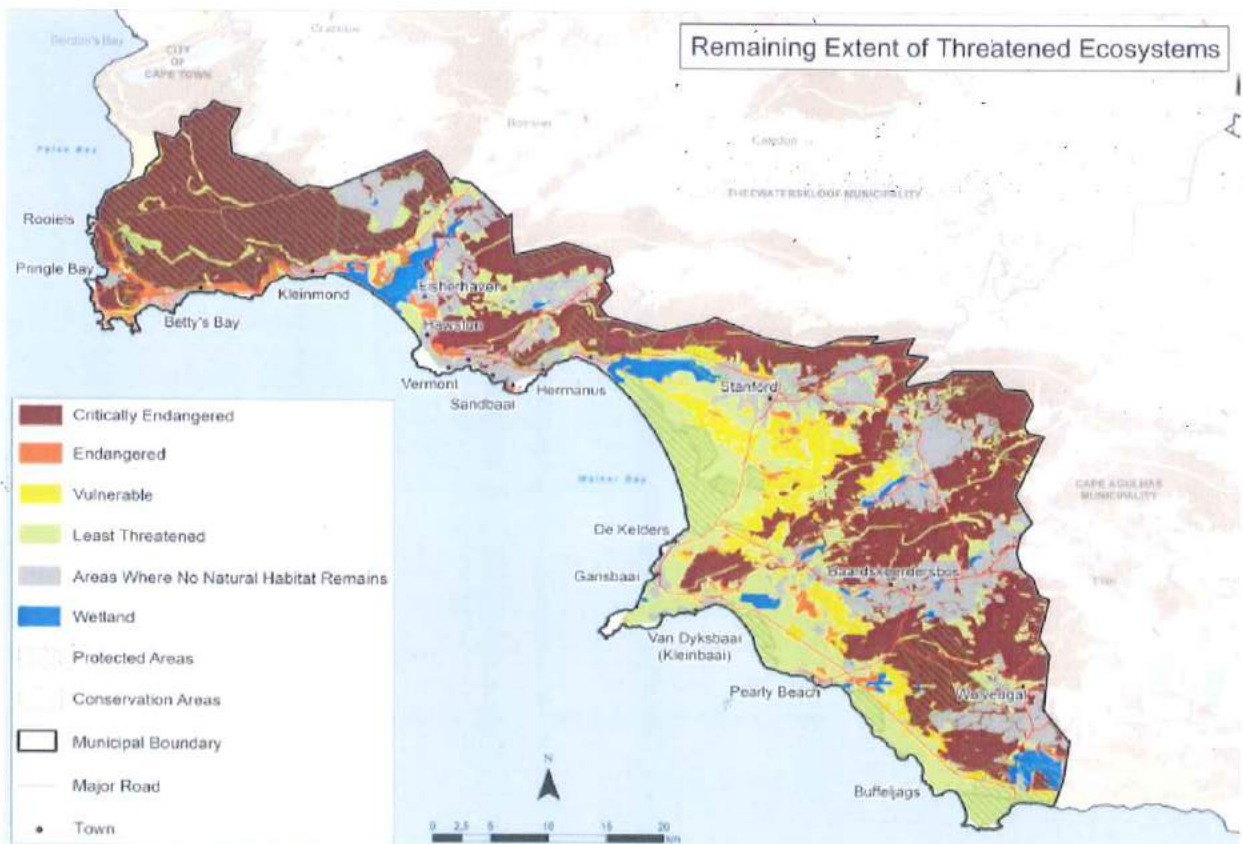
Plan 26: Kleinmond Status Quo



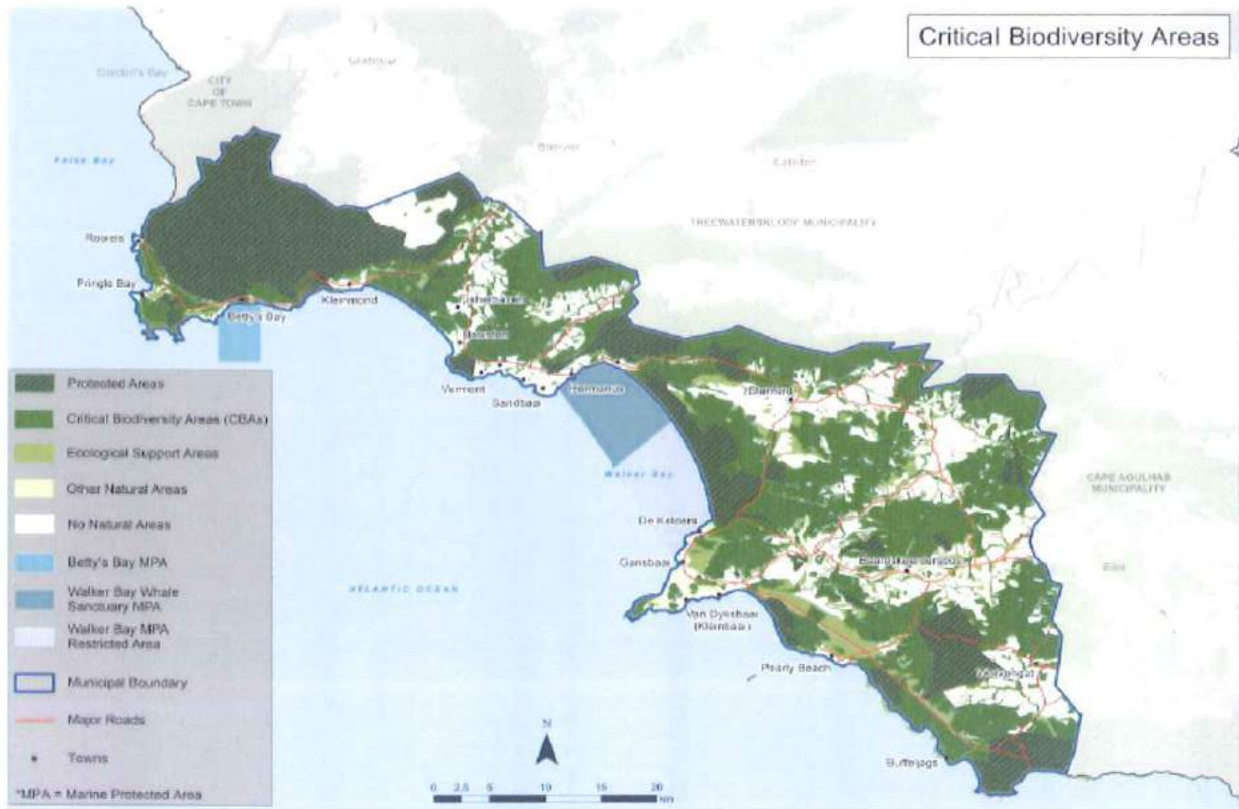
Plan 49: 2050 Kleinmond Spatial Proposal



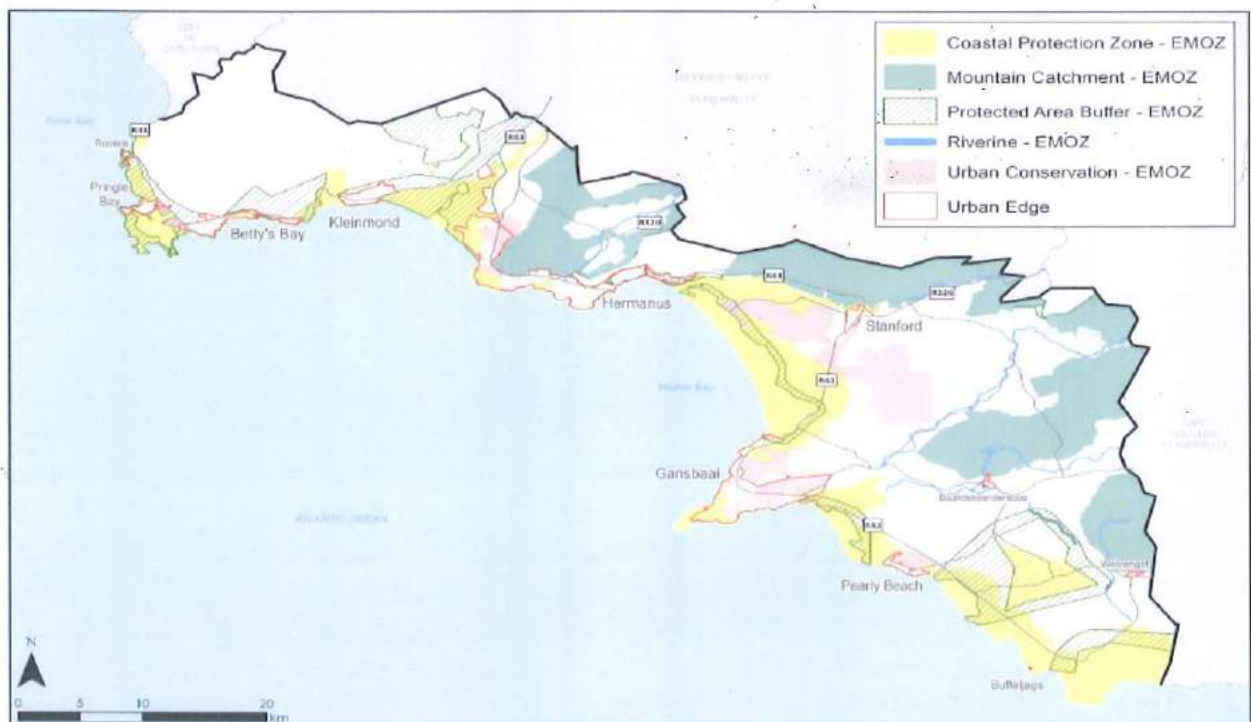
Plan 3: NFFPA



Plan 4: Remaining Extent of Threatened Ecosystems



Plan 5: Critical Biodiversity Areas



Plan 16: Composite EMOZ

J H Briers

Director: Kogelberg Biosphere Reserve Company
30 April 2020



Commenting Party

1. Planning Directorate at the WC Department of Human Settlements
2. Environmental Affairs and Development Planning Directorate: Spatial Planning
3. WCPG Department of Transport and Public Works - Directorate Transport Policies and Strategies
4. WCPG Department of Transport and Public Works - Directorate Infrastructure Policies and Strategies
5. WCPG Department of Public Works: Road Network Management
6. Cape Nature
7. DEADP Directorate Biodiversity and Coastal Management
8. WCPG Department of Health
9. Engineering Department Overstrand Municipality
10. Overstrand Municipality Directorate Infrastructure and Planning: Building Control
11. Giorgio Lombardi MSC, Warden on behalf of Vogelgat Private Nature Reserve, Hermanus
12. Betty's Bay Ratepayers Association
13. Overstrand Municipality Environmental Management - Penelope Aplon
14. Pat Redford
15. Kogelberg Biosphere Reserve Company (KBRC)

INTRODUCTORY NOTES

It is deemed important to provide an outline of the unique spatial planning policy framework of the Overstrand Municipality with specific focus on where the MSDF fits into this framework. The MSDF forms the strategic spatial policy framework which guides development, management and conservation within the Municipality on a broad scale. The Overstrand MSDF does not contain project/site specific detail in its proposals in order to keep the framework strategic and flexible in its daily application.

The higher level of detail components are contained in a suite of Council Policies, which include the Overstrand Growth Management Strategy (OGMS), the Human Settlement Plan (HSP), the Engineering Master Plans, Integrated Transport Plan (ITP), etc. The reader of the MSDF will therefore for example identify an area earmarked for New Urban Infill (residential, community facility and mixed land uses) which is not refined to a site/ project specific level. The detail pertaining for the delineated area will be available in the various aforementioned Council documents informed by the provisions of the MSDF.

It should, however, be noted that both the Growth Management Strategy (OGMS) and Human Settlement Plan (HSP) require extensive updates. The process of updating the OGMS has been commenced with and revision will continue based on numerous informants yet to be compiled, including a detailed community facility analysis, updates of the engineering master plans to align with the new MSDF proposals, etc. Although in need of update, the raw data which related to the relative subjects is available and the Municipality thus operates based on updated information and local knowledge, as an interim arrangement prior to the review of the last mentioned more detailed policies policies.

The commenting parties, although being briefed on the nature and methodology of the aforementioned spatial planning policy framework, seems to have failed in providing its comments based on this context, which unfortunately has resulted in numerous repetitions in responses relating to how the Overstrand planning policy framework functions. Detailed information is for example repeatedly requested, although it is clear that such detail is by its strategic nature in the aforementioned OSDF, but rather in the suite of specific Council policies that it directs.

Notwithstanding this, the individual comments were responded to, and amendments made to the MSDF report as deemed necessary.

COMMENTING PARTY		COMMENT	DRAFT RESPONSE ITEMS
1. Planning Directorate at the Department of Human Settlements			
1.1 Planning Directorate at the Department of Human Settlements	From a human settlement perspective one of the key objectives of the SDF is to address distorted spatial patterns, fragmentation, prioritise development interventions and projects in previously disadvantaged areas with the highest potential and physical capacity to accommodate sustainable growth. This includes identifying areas for compaction and intensification. In many cases the spatial representation of the proposals does not necessarily demonstrate to the reader how the Municipality envisages to achieve these objectives.	<p>The MSDF as outlined in presentations to the Intergovernmental Steering Committee (at which the commenting party was present) is for many reasons strategic in nature, including flexibility to prevent ad hoc amendments by means of amendment applications (due to changes in high detail proposals).</p> <p>As stated to the ISC, the Overstrand, other than most Municipalities in the country, has a high level local detailed Growth Management Strategy, being updated to align the aforementioned with the MSDF proposals. This document focuses on detailed growth management interventions, premised predominantly on densification of extensive areas within the Overstrand Settlements, which also relates to distorted spatial patterns.</p> <p>This document should therefore be consulted for more detail of the spatial proposals contained in the MSDF, the range of densification proposals etc.</p> <p>From the outset, it should also be noted and acknowledged that the Overstrand Municipality Human Settlement Plan (HSP) is outdated and the information therein could not be used to inform the MSDF. The MSDF is a high level strategic document which will direct and enable flexible human settlement planning based on an updated HSP, where spatial planning can address existing distorted spatial patterns and fragmentation. The MSDF is therefore promotes and informed and intensive densification strategy, but also earmarks new urban infill areas, which could potentially provide for the opportunity to implement spatially sustainable human settlements (refer Hawston-Fisherhaven, Stanford etc.)</p>	
1.2 Planning Directorate at the Department of Human Settlements	It is clear from the report that the Overstrand Growth Management Strategy (OGMS) is a critical document which must be read in parallel to the SDF to guide spatial proposals for new urban development areas, but this document is mostly outdated or silent and does not provide the necessary guidance on a local scale to identify areas where re-development interventions can and or should be prioritised.	<p>This statement is correct. It should further be noted that the Overstrand Municipality is in the process of updating this important document to align it with the provisions of the revised MSDF.</p>	
1.3 Planning Directorate at the Department of Human Settlements	It is acknowledged and appreciated that the Municipality seeks to have an SDF that is broad and strategic in its proposals to enable flexibility, whilst the OGMS focusses on informing the SDF proposals insofar as its densities, land use guidelines etc. but having said that, it is difficult to review and comment on the SDF as it is heavily dependent on the outdated proposals of the OGMS. Although it is recognised that these two documents are interdependent they should also be able to function as stand-alone documents.	<p>As stated, the OGMS is in the process of being updated. The comment regarding the commenting party finding it difficult to review and comment on the MSDF is noted. It is our considered opinion that the two documents due to the manner in which they were compiled can, however, indeed function as stand-alone documents.</p>	
1.4 Planning Directorate at the Department of Human Settlements	The report acknowledges the importance of directing growth and development interventions to areas with the highest potential and physical capacity to accommodate sustainable growth, but the spatial proposals and strategies presented in Part 5 do not really filter through as one would have hoped for.	<p>The reality is that the Overstrand has very limited vacant land available for development. The land areas earmarked for development was done based on the availability of land based on the statutorily informed spatial planning principles such that of SPLUMA. In light thereof, the growth management of the Overstrand is based on i) development of suitable vacant land (i.e. new urban development areas on the plans) and ii) detailed appropriate densification/ infill development.</p>	

2/33

<p>1.5 Planning Directorate at the Department of Human Settlements</p>	<p>Throughout the report reference is made to a land audit undertaken as part of this process. To contextualise the reader, it will be useful if this information can be spatially demonstrated and the implication thereof on future planning unpacked.</p>	<p>A land use survey was undertaken regarding industrial, commercial and community facilities. This informed the status quo analysis, as well the strategic spatial proposals of the MSDP. No comprehensive land audit was done, other than the aforementioned, as this was not required for the review of the MSDP, but will certainly have to be undertaken at the more detailed planning levels that will follow.</p>
<p>1.6 Planning Directorate at the Department of Human Settlements</p>	<p>On a district level it is important to understand the interrelationship between Overstrand and Theewaterskloof municipalities. As you know the draft SDF has identified Fisherhaven/ Hawston as a future growth area. How will this impact the interrelationship between these towns and Botrivier which is situated in close proximity?</p>	<p>Interconnectivity between the two nodes can be expected, including social, biodiversity as well as economic connectivity resulting in partial increase in integration between the two Municipalities as stated in the MSDP.</p>
<p>1.7 Planning Directorate at the Department of Human Settlements</p>	<p>The perception is created in the report that the total housing need is defined as the total amount of informal structures. This is incorrect as the need cannot be determined merely by the number of informal structures. It must also include the broader waiting list which includes backyard dwellers. The total housing need may therefore be much greater than the estimated number of opportunities, which in turn will further impact on the total land area required. Although embracing informality is a priority, assisting backyarders in overcrowding conditions is also an important consideration that cannot be ignored.</p>	<p>The statement by the commenting party is factually incorrect. The housing need was determined on a credible statistical methodology of which the steps are outlined in detail in Section 2.4.1.1 of the MSDP. This was, amongst other, informed not only by the amount of informal structures, but also overcrowding (back-yard dwellers), population growth etc.</p>
<p>1.8 Planning Directorate at the Department of Human Settlements</p>	<p>What are the SDF's proposals in terms of densification policies? As previously noted it is clear that the SDF is heavily dependent on the OGMS for guidance in ensuring growth and development in confined urban settlement. Having said that, the OGMS does not seem to advocate densification and compaction in areas currently experiencing extreme population influx and shortage of suitably well-located land e.g. Kleinmond and Hermanus. It is imperative that the SDF not only acknowledge the realities on the ground, but also identify spatial proposals that will respond accordingly.</p>	<p>The OGMS is the policy document that provides the detail regarding densification. The simple fact is that there is virtually no/ extremely limited vacant developable land available in Hermanus, hence the proposal for the Fisherhaven/ Hawston growth node. The OGMS is in the process of being upgraded. This will include an updated analysis of all areas, especially where shortage of land and influx are prominent.</p>
<p>1.9 Planning Directorate at the Department of Human Settlements</p>	<p>Mapping must be presented consistently throughout the document and must also align with the narrative, where relevant. Furthermore, mapping between SDF and OGMS must also be synchronised to contextualise the reader, particularly in the case of Hawston/Fisherhaven and Hermanus (West, Central and East).</p>	<p>This is noted, however, the two documents were compiled based on entirely different methodologies and therefore plan sets. The plans are regarded as more than adequately aligned with the related text and both documents are considered most legible in this regard.</p>
<p>1.10 Planning Directorate at the Department of Human Settlements</p>	<p>The spatial presentation of housing related projects must be reflected consistently throughout the document (Perhaps give an example here of where this is not happening). Furthermore, the status quo maps should ideally include informal settlements, but also distinguish between current and future housing projects to ultimately guide future proposals.</p>	<p>As stated repetitively the MSDP is strategic in nature with Council policy document containing the detail related to its spatial proposals. The GMS outlines densification and related aspects; The Strategic Environmental Management Plan environmental aspects; and The Human Settlement Plan outline the detail requested by the commenting party. The Human Settlement Plan, providing the detail area categories in terms of</p>

<p>1.11 Planning Directorate at the Department of Human Settlements</p>	<p>Unfortunately, the report also does not spatially reflect the Restructuring Zones gazetted by National, as well as the "Priority Housing Development Areas" (PHDA). These areas may have dramatic impact on not only future low-cost housing development, but also grant funding in general from National Government going forward. It must be noted that DHS in collaboration with the Municipality have identified these land pockets for human settlement development purposes, hence it is important to understand what the SDF envisages for these land pockets and where necessary coordination and alignment is imperative.</p>	<p>housing and community facility provisions, can be amended on a regular basis based on the iterative nature of proposed future human settlement development. The MSDF can simply due to the statutory process requirements not be amended on such a regular basis to remain consistent with detailed changing human settlement planning. This is one of the key reasons why the MSDF is kept strategic so as to allow flexibility. All housing projects and related development are to be contained in the HSP and OGMS.</p> <p>It is acknowledged that the Overstrand HSP should be updated as a matter of priority, informed by the new urban development areas identified by the MSDF, as well as its policies and principles.</p>
<p>1.12 Planning Directorate at the Department of Human Settlements</p>	<p>It was also suggested that a clear link must be drawn between the SDF and the Human Settlement Plan (HSP), specifically in terms of decanting and relocation strategies associated to informal settlement upgrading projects. The latest SDF has not been amended to stress this linkage between the two strategies.</p>	<p>Refer previous response. In the Overstrand spatial planning framework, the HSP is the Council document that provides all human settlement information. The structuring zones will be reflected in the revised HSP.</p>
<p>1.13 Planning Directorate at the Department of Human Settlements</p>	<p>Page 21, Section 2.4.5, paragraph 3: the report states that Kleinmond has experienced a small growth of only 0.4% or 455 people over ten years. Is this correct? From a housing perspective a huge housing demand, comprising a growth of both backyarders and informal dwellers was experienced over the last couple of years. Please update where necessary.</p>	<p>This statement is correct. The reason being that the current HSP is outdated. The updating thereof is a matter of priority but does not form part of this terms of reference. This aspect and many other similar questions will have to be addressed in the HSP.</p>
<p>1.14 Planning Directorate at the Department of Human Settlements</p>	<p>Page 23, Section 2.4.7 paragraph 1: Please clarify what is meant by CRU, taking into account that the CRU programme (rental housing) for those earning below R3501 no longer exists.</p>	<p>This is based on the available data which, amongst other, also provided an understanding of the change over time which enabled an extrapolation. No further information was provided to support a different outcome.</p>
<p>1.15 Planning Directorate at the Department of Human Settlements</p>	<p>The data reflected on Page 23, Section 2.4.7 paragraph 2 does not appear to be accurate and needs to be updated to be consistent with Table 2.7. It is further recommended that a breakdown of the informal settlements referred to be provided so as to contextualise the reader.</p>	<p>The data used included CRU and was contextualised in terms of the available data. Reference thereto has been removed.</p>

The data reflected on page 23 relates to household income and was provided by a reputable development economist. Table 2.7 relates to informal housing and it is therefore unclear what the Department requires in terms of the correlation between the two.

As stated numerous times, housing and related detail will be provided in the revised HSP and GMS.

<p>1.16 Planning Directorate at the Department of Human Settlements</p>	<p>Page 24 Section 2.4.8.1: The information in its current form does not respond to the realities experienced in the respective settlements. Where necessary the data needs to be updated to look beyond 2016. E.g. Kleinmond. Significant growth rates have serious implications for spatial planning in the area and region.</p>	<p>The information utilised to compile the MSDF was based on the data available. We did not have access to or were not aware of other studies that could support a different outcome. The basis is a sound analysis of available information. One would expect that the Department would not only merely state that data is in its opinion incorrect, but provide the 'correct' data if such data is available. This will have to be addressed in the next MSDF revision following an in depth discussion with the members of the ISC who constantly question the independent economist's findings.</p>
<p>1.17 Planning Directorate at the Department of Human Settlements</p>	<p>According to Page 25, paragraph 8 and table 2.7 the housing need is based on shack count and estimated at 10000 opportunities. As previously noted this section must be revisited to not only focus on informal structures, but also the waiting list, which should include backyard dwellers.</p>	<p>The housing need was determined on a credible statistical methodology of which the steps are outlined in detail in Section 2.4.11 of the MSDF. This was amongst other, informed not only by the amount of informal structures, but also overcrowding (back-yard dwellers), population growth etc.</p>
<p>1.18 Planning Directorate at the Department of Human Settlements</p>	<p>Table 2.9 on page 27 does not reflect the housing need for Hawston/Fisherhaven or is it captured under "Hermaus"? Where relevant kindly ensure that the housing need is correctly calculated to include all towns/settlements and that the land requirements (ha) is updated in alignment thereto.</p>	<p>The information collated in Table 2.9, page 27 of the MSDF report refers to data on a Main Place basis as per the Census data base, as this was the only information readily available. Hawston and Fisherhaven were included as part of the main place (Hermaus). The raw data source does not make it possible to separate the settlements.</p>
<p>1.19 Planning Directorate at the Department of Human Settlements</p>	<p>Page 61 the paragraph under "Stormwater" does not make sense and information appears to be missing. Please update.</p>	<p>Information on Page 61 will be updated and revised.</p>
<p>1.20 Planning Directorate at the Department of Human Settlements</p>	<p>Page 63, Section 2.7.5: It is recommended that this section be dealt with consistently in respect of each node/settlement and that the total amount of additional households / du should from the stance include overcrowding, waiting list etc. The housing need for the indigent should not be dealt with separately, but included in the total calculation, which in turn should guide the spatial proposals and intervention needed to address the broader demand not only the lower income brackets.</p>	<p>It should again be noted that the HSP will include the required detail related to human settlement development as requested by the commenting party.</p>
<p>1.21 Planning Directorate at the Department of Human Settlements</p>	<p>Confirm if the calculations on Page 73, paragraph 3 - 6 is in alignment with the recent land suitability study undertaken by the Overstrand Municipality? According to the report a total of approximately 65ha is required to address the housing demand, but it does not appear to have filtered through to the spatial proposals, nor does it seem to synchronise with the OGMS proposals.</p>	<p>The land requirement is based on population growth. There is, however, simply not sufficient land available in terms of extent (i.e. 65ha) in Kleinmond. The additional amount will have to be accommodated in nearby towns and/or densification. The GMS is in the process of being updated and will have to give specific attention to this challenge.</p>

<p>1.22 Planning Directorate at the Department of Human Settlements</p>	<p>The area located between Hawston and Vermont seems to be omitted from the status quo information and is also only partially mapped. See "Plan 28 on page 79 and 82". E.g. Hoek van die Berg. As previously mentioned, mapping between SDF and OGMS also does not align and must be synchronised.</p>	<p>Comment noted. "Hoek van die berg" has been indicated on the plan-set. Refer response item 1.9 re. the difference in the methodology of compiling the OGMS and MSDF and the subsequent difference in planning areas.</p>
<p>1.23 Planning Directorate at the Department of Human Settlements</p>	<p>Page 194 Section 5.7.2.2 paragraph 3 states that extensive detail pertaining to the growth management proposals is presented in the OGMS, but because the last mentioned document is outdated only partial direction is provided.</p>	<p>As stated before, the OGMS is in the process of being updated.</p>
<p>1.24 Planning Directorate at the Department of Human Settlements</p>	<p>As a minimum the report should demarcate development intervention areas. What are the implications of the key policy statements LO 3 (i) to (iii) on page 198 and how do the SDF proposals and OGMS intend to respond?</p>	<p>The detail of intervention areas will not be included in the SDF, but should be accommodated in the relevant Council policy documents such as OGMS and HSP. LO (i) Detail of how housing will be spatially accommodated in HSP. LO (iii) Detail of location of community facilities will be contained in the revised HSP. As stated numerously the MDSF is strategic and does not provide detailed development proposals. Refer previous responses in this regard. It should be noted that not all policy directives are directly related to spatial proposal plans, but to a range of other aspects (i.e. administrative, management aspects, etc.)</p>
<p>1.25 Planning Directorate at the Department of Human Settlements</p>	<p>Page 199, Plan 55 still shows the open space area in Schulphoek as a CBA area. Kindly update mapping to respond to the onsite realities. Furthermore, the OGMS makes no recommendations in respect to densification for Schulphoek / Zwellifhle. As a minimum the SDF and OGMS must be updated to better align and provide spatial proposals.</p>	<p>The spatial proposal details will be provided in the revised OGMS/ HSP following availability of the detailed planning from WCG as custodians of this development. The open space area was omitted from the plan for the Schulphoek area.</p>
<p>1.26 Planning Directorate at the Department of Human Settlements</p>	<p>Page 206 Section iii – please clarify as this statement does not align to the population growth experienced in Zwellifhle/ Mount Pleasant. Densification interventions in this area, particularly Schulphoek will be critical. Similarly, as in the case of Hawston/ Fisherhaven and Gansbaai.</p>	<p>"No new urban development areas / urban edge amendments are proposed for Hermanus Central with densification and infill as the proposed tool to accommodate population growth; the housing need in accordance with the provisions of the OGMS." - This statement is correct. Schulphoek/Mount Pleasant was always within the urban edge, the informal settlement will not be a "new development area" but is already part of the urban footprint and will require formalising. It should be noted that providing the detail aspects requested regarding formalisation of informal settlements is the function of the HSP and based on WCPG's initiatives. The extension of Fisherhaven and Hawston as development node is proposed to accommodate the growth in human settlement needs of Hermanus, given the lack of available land. Detail w.r.t. to the densification in all of the aforementioned areas will be provided in the revised OGMS and HSP.</p>

<p>1.27 Planning Directorate at the Department of Human Settlements</p>	<p>According to the status quo for Gansbaai over 231ha of land will be required by 2031, but Page 222 does not identify any new development areas, but rather promotes densification. Does this land requirement include current housing projects such as Masakhane and Blompark that are currently being implemented? The same goes for Stanford. Furthermore, the OGMS will need to where relevant be updated to reflect the status quo in respect of zonings, land use and densification.</p>	<p>The land requirement referred to by the writer is based on the population growth only and presents potential projected theoretical requirement. It therefore does not include Masakhane and Blompark. There is limited vacant land available in Gansbaai. The alternative option is to accommodate the future population demand via densification/ infill within alternative surrounding towns. The OGMS will be updated.</p>
<p>1.28 Planning Directorate at the Department of Human Settlements</p>	<p>New urban infill areas are identified for smaller second order towns such as Pearly Beach and Stanford, which are not generally considered as priority areas, whilst in other towns such as Kleinmond no new urban development areas are proposed, does this align with the SDF objectives?</p>	<p>It is based simply on the availability of land – the mentioned smaller nodes have land available where others simply do not. This is a practical and accurate reality of the type of challenges that face the Overstrand, and which in certain cases mitigates against planning achieving ideal/textbook urban forms.</p>
<p>2. Environmental Affairs and Development Planning Directorate: Spatial Planning</p>		
<p>2.1 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>To begin with, please find the comments of the DEA&DP Directorate Spatial Planning. For ease of reference, these comments follow the structure of the Draft SDF.</p>	<p>Noted</p>
<p>2.2 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>"Part 1: Introduction" Section "1.1 Background" refers to how the tender brief and scope of work includes: "To update and merge the MSDF (2006) with the Overstrand Integrated Development Framework (IDF 2014) and the Overstrand Strategic Environmental Framework (EMF 2014)" and; "To strategically, as a separate and consistent exercise, update the Overstrand Growth Management Strategy (OGMS) to include commercial and industrial components and any other relevant growth management strategies / spatial amendments".</p> <p>On enquiring with the Municipality as to the progress with the OGMS we learnt on the 12 of March 2020, that this Strategy is in the process of being compiled. The fact that it is not yet available for scrutiny is unfortunate as the SDF needs to be read together with the more detailed information provided in the OGMS.</p>	<p>This comment is noted and it is agreed that a full comprehensive and final review of the OGMS report based on, amongst other the MSDF, would have been the ideal. It came to the service provider's attention that although a strategic review was requested, specific detailed revisions will be required to effect a proper reviewed report. In future this will be undertaken. It includes additional location specific detailed data collation and analysis related to housing and community facilities, revision of density provisions etc.</p>
<p>2.3 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>"Section 1.4 Key Statutory Requirements" Table 1.1. lists the 5 SPLUMA principles and the implementation thereof. Under the principle of "Spatial Resilience" reference is made to disasters, both natural and man-made. The possibility of a disaster as the result of fire appears to have been overlooked in the SDF. The possibility of veid fires in the Overstrand Municipal area is a very real threat, with the Municipality having to deal with such fires on numerous occasions.</p>	<p>The Western Cape Coastal Management line as is indeed a disaster mitigation measure and is indicated on all of the relevant coastal plans. Disaster due to sea level rise/ extreme high water tidal rise has been addressed in detail in the Overlay Zone Regulations which are referred to.</p>

	<p>Yet the SDF is silent on the question of void fires and settlement interface, in particular. This despite the fact that the draft SDF reads: "Identify and prioritise areas most vulnerable to possible disasters". It is suggested that prior to the approval of this SDF a check is done to determine whether or not the SPLUMA principles have been adequately addressed, as was the stated intention at the outset.</p>	<p>The Overstrand Municipality are in the process of finalising their fire management plan and spatial mitigation related thereto. This was not readily available to implement in this SDF, but will be implemented as part of the next yearly review of the SDF.</p>
<p>2.4 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>"Part 2: The Overstrand Municipal Area" "Section 2.4 Our people" Within this section what is missing is a list of all the towns/ settlements in the Municipality, with clear population projections per town up until 2030. Such information is available from the Department of Environmental Affairs and Development Planning. This information should be used to inform Table 2.9 on page 27 of the draft SDF.</p>	<p>Section 2.4.8 (p25) was revised to include population projections up until the year 2031. It should be noted that not all of the settlement data was available and therefore not all projections could be provided. This should be updated when the next Census data becomes available and/or the data set referred to by the Department has been obtained and verified by the MDSF development economist.</p>
<p>2.5 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>"Section 2.4.10 Protest Action" The SDF notes how there is a "particular demand for housing for middle-income wage earners, earning more than the minimum salary of R3 500/month, who are excluded from state housing programmes and forced to live in backyard dwellings". These middle-income wage earners are good social housing / inclusionary housing candidates, yet the SDF is silent on the application of the inclusionary housing policy. (In terms of SPLUMA, section 2.1(i) the SDF should identify the designated areas where a national or provincial inclusionary housing policy may be applicable). The SDF needs to be amended to spatially indicate where these designated areas are. Furthermore, while the need for housing in this segment of the market is identified, it would appear that later on the focus in the SDF when referring to housing need is on those earning under R3500 / month. It is suggested that when referring to the future number of additional dwelling units to be accommodated per settlement, that a clear distinction is made between the anticipated number of dwelling units per market segment.</p>	<p>The SDF by its very design and functioning does not provide detail w.r.t. what market/ income category/ type of housing will be provided. This ensures that the SDF is and flexible. This MSDF must be read in parallel with the suite of more detailed Council documents, which includes the GMS and the HSP which will provide the necessary levels of detail. This terms of reference does not include the update of the HSP and it is recognised that this is a required project to be undertaken by the Municipality as this tool, which will inform detailed spatial and land use planning regarding housing (incl. the types referred to) and community facility provisions.</p>
<p>2.6 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>"Section 2.4.11 The Future Housing Need" This section states that the housing need in Overstrand is calculated based on the number of people living in informal structures as well as households living in overcrowded conditions. From this one can assume that the "middle income wage earners" as referred to above, are included. Yet, further on in this section, in Table 2.9 it is stated that this table "depicts the housing need for the indigent". Is the reader to assume that the "indigent" include the "middle income wage earners"? if this is the case, then the SDF should specify this, to avoid any uncertainty. Table 2.9 groups the housing need for the Municipality into "four towns", namely Hangklip, Kleinmond, Gansbaai, Stanford and Hermanus. Should the reader assume that reference to Hermanus also includes Zwelible and Hawston? Given that population growth is not equally spread in Overstrand, with some areas such as Zwelible showing far higher growth rates than others, the decision to assign uniform population growth rates across the "four towns" to project the housing need in the Municipality until 2031, is questioned.</p>	<p>Different growth rates were applied to reflect the areas of high and lower growth. It is self-explanatory that indigent does not include the middle income earners. The four towns (now table 2.1 p28) are the statistically designated Census main places which were the only places for which the data required to calculate the housing need was available.</p>
<p>2.7 Environmental Affairs and Development Planning</p>	<p>"Section 2.7.5 Urban Nodes" Kleinmond It would appear that 2 contradictory statements are made on page 73 with regards to Kleinmond. The first</p>	<p>Noted. This has been rectified.</p>

<p>Directorate: Spatial Planning</p>	<p>statement says "Based on an average household size of 2.6 persons per household, this amounts to a total requirement of 130 additional dwelling units by 2031." Further down on this page it is stated that the projected housing need is set to increase to 2468 dwelling units by 2031. Is the latter figure different because this is a cumulative total? This needs to be checked and reworded if necessary.</p>	<p>The engineering master plans and revision of project roll-out will be revised informed by the provisions of the new MSDF. This will include infrastructure requirement upgrades of key areas. The CEF, as communicated on more than one occasion to the Department, will not at this stage contain project details due to the fact that it may require ad hoc amendments to the MSDF as projects change. This remains the position of the Municipality.</p>
<p>2.8 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>Hawston It is noted on page 78 that the water treatment works will require upgrading if future developments are planned. In addition, it is noted that the bulk water storage capacity is limited and will therefore limit future development. These infrastructure upgrades should be seen as a priority since the Hawston/Fisherhaven area has been selected as a future growth area for the Municipality. This information should feed into the Capital Expenditure Framework (CEF) component of the SDF.</p>	<p>The engineering master plans and project implementation plans will be revised/revisited following adoption of the MSDF. This will include infrastructure requirement upgrades of key areas. The CEF, as communicated on more than one occasion to the Department, will not at this stage contain project details due to the fact that it may require ad hoc amendments to the MSDF as projects change. This approach remains the position of the Municipality.</p>
<p>2.9 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>Hermanus On page 80 the draft SDF states that an additional 35 517 dwelling units will be required for the Greater Hermanus Area by 2031, based on an annual growth rate of 5.2% / annum. This growth rate is far higher than that which has been estimated by the Department of Environmental Affairs and Development Planning. (See the comment under "Section 2.4" above with regards to population projections.) At a density of 200u/ha this equates to 1775 ha that will be needed. At a density of 150u/ha, 2 367ha of land will be needed. For the most part and as acknowledged in the text, the high population growth rate has been driven by the increase in the number of people living in Zwelithi. Given the limited space available for Zwelithi to expand much further, the sharp increase in population numbers currently experienced may well not be the norm going forward. In addition, as the SDF acknowledges on page 24 the area of Hermanus that extends from Mount Pleasant to Voelklip has seen a decline in population growth with a growth rate of -0.2% forecast for 2011 to 2016. Thus, the additional number of dwellings currently anticipated to be required by 2031, may well need to be re-evaluated, with the possibility that less additional land will be required. As far as service infrastructure provision for Hermanus Central is concerned, the water pipe network needs to be replaced and an upgrade of the wastewater system is required. Hermanus East needs an upgrade to the wastewater treatment works, as well as an upgrade to the stormwater system. This information should feed into the Capital Expenditure Framework (CEF) component of the SDF.</p>	<p>The approach was adopted by Overstrand Municipality following in-depth discussion. It was agreed that the projection/ or any projection is indicative and that the projected number was subject to review based on changing circumstances. It was concluded that approaches may differ The engineering master plans and project implementation plans will be revised/revisited following adoption of the MSDF. This will include infrastructure requirement upgrades of key areas. The CEF, as communicated on more than one occasion to the Department, will not at this stage contain project details due to the fact that it may require ad hoc amendments to the MSDF as projects change. This approach remains the position of the Municipality.</p>
<p>2.10 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>"2.8 Facilities" It is noted that Table 2:20, which shows Community Facility Requirements for Hermanus (including Zwelithi), does not include all the health care facilities that are currently available in Hermanus. In the input from the Department of Health, which is included later in these comments, reference is made to the Hermanus Hospital as well as the Hermanus Community Day Centre, neither of which are reflected in the list of facilities included in Table 2.20. It is suggested that the facility lists for each town are carefully scrutinized to ensure that the existing facilities are correctly reflected.</p>	<p>The healthcare facilities are not listed by name, and are accounted for under primary healthcare facilities. The current lists were scrutinized by the Overstrand Municipality as well. The lists have been updated with the information provided.</p>

<p>2.11 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>The Directorate Strategic Immovable Asset Management Planning, within the Provincial Department of Transport and Public Works have indicated that a new Primary and High School are being planned for Zwelithe. Although the date for the construction of these schools is uncertain, the SDF should identify suitable sites for these two schools. It is acknowledged that the location of these sites may be included in the Overstrand Growth Management Strategy, but since the update of this Strategy has not been made available for comment with the SDF, this cannot be confirmed.</p>	<p>The MSDP does, given the fact that the detail planning is provided in the GMS and HSP, not make provision for specific sites due to the fact that changes in location will result in inflexible delayed ad hoc SDF amendments, which is counterproductive to the developmental mandate of the municipality. The GMS is in the process of being revised and this information is welcomed for future inclusion in the final revised GMS and revised HSP as higher level of detailed Council documents.</p>
<p>2.12 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>"Part 3: Spatial Vision, Strategies and Policies" "3.2 A Liveable Overstrand" One of the policies referred to on page 120, is "Progressively ensure housing provision for different lifestyle choices, income groups, life stages, household sizes and adequate provision for the aged". The text continues by listing which documents need to be referred to when implementing this particular policy. An important document that is not included in this list is the "Western Cape Land Use Planning Guidelines for Rural Areas, March 2019". (Table 2.1 in Part 2 of this SDF, incorrectly refers to the old version – namely the "Western Cape Rural Development Guidelines of 2018". The SDF needs to be amended to include the most up to date version of the document).</p>	<p>Noted. Source updated.</p>
<p>2.13 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>"3.3 An Environmentally Sustainable and Resilient Overstrand" On page 128, one of the policies listed is to "Discourage development in areas where there are major infrastructure constraints". Whilst this may seem logical, it also needs to be recognized that areas with major infrastructure constraints are likely to be those areas with the greatest growth potential and development pressure e.g. Hermanus. People want to live in Hermanus as they believe it is an area of opportunity, the high population numbers in turn increase pressure on the infrastructure networks. Therefore, it is not always possible, nor does it necessarily make sense to discourage development in areas where there are major infrastructure constraints. The areas with the highest growth potential should in fact be prioritized for infrastructure provision. The other benefit of targeting areas with the most pressure is that the provision of infrastructure in these areas helps to mitigate the impact of falling infrastructure on ecosystems and ecosystem services.</p>	<p>The comment is noted. The areas with infrastructure constraints where development should be discouraged, naturally does not include areas earmarked as growth priority areas (for example the new urban infill areas).</p>
<p>2.14 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>"3.7 An Overstrand that enables a prosperous and diverse economy" On page 144, "Policy ECO 3.vi" states that the "provision of bulk infrastructure and services to industrial areas must be given the highest priority". Whilst on the one hand, the reason for wanting to promote the functioning of industrial areas is understood, the flip side of this policy statement is that bulk infrastructure and services to low income and informal settlements is not seen as the highest priority. Given that the low income area of Zwelithe has seen significant population growth in the last few years, the policy position of focusing infrastructure investment in industrial areas may need to be reconsidered.</p>	<p>This policy statement has been revised based on the Department's input. The writer is confirming the issues. Making infrastructure provision a priority for industrial areas does not imply that housing land will be excluded. The development approach is always integrative and balanced. Addressing the past spatial imbalances is only possible where land is available to affect this. In Stanford, the opportunity exists to locate a new urban infill area (mixed use human settlement) abutting the town's economy/ employment creation hub. Therefore the area was earmarked as an integrated new urban development/ human settlement area consistent with the provisions of SPLUMA (spatial justice).</p>

<p>2.15 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>It is noted that with concern that the Spatial Policy Directives do not speak to the need for integration between different communities and income groups, nor does it refer to the real need for spatial transformation, specifically to rid the municipality of apartheid spatial planning. The lasting effects of apartheid spatial planning remain, with the poor on the periphery of settlements, without access to adequate infrastructure and services. This reality should be acknowledged and addressed in the SDF, as apart from being good planning practice, it is a requirement of SPLUMA.</p>	<p>Zwellihle is located abutting medium to high income areas on virtually all of its boundaries and therefore well integrated with a range of income groups. It should again be reiterated that the Overstrand consists of very limited green/ brownfield land which renders ideal spatial planning in terms of the principles of SPLUMA at best a difficult challenge if not impossible at places.</p>
<p>2.15 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>"Part 4: Spatial Development Strategy" One of the overarching principles in section 4.2.1 is "Containment" – "The growth of urban nodes and rural/ agricultural settlements should be strictly contained within well-defined boundaries, within new potential rural development areas contained by the same mechanism." The concept of "new potential rural development areas" needs further explanation. What would be considered a "rural development area"? Would this include a lifestyle estate in the rural area for example? If so, then the location and implications thereof should be discussed in the SDF. Whatever is envisaged here, a thorough cost-benefit analysis would need to be undertaken by the Municipality when considering a new "rural development area", which would need to look at both the short term and long term impacts to the Overstrand Municipality. (This would include impacts on biodiversity, unique or high value agricultural land, impact on existing farming activities, the municipality's existing reticulation network, the future use of minerals etc.) As with the principle referred to above, we have a similar concern with the principle of "Land Use Diversification" – "The diversification of rural and industrial based development opportunities, based on locational and comparative resource advantages must be promoted in selected areas to stimulate economic growth and employment of the rural population". Whilst stimulating economic growth and employment in rural areas is certainly a goal to strive for, this can only happen in the context of understanding both the short and long term costs and benefits to the Municipality, its residents and other spheres of government of these "development opportunities". In addition, any "land use diversification" in rural areas must be in line with the Western Cape Land Use Planning Guidelines for Rural Areas. Furthermore, any land diversification needs to be done carefully so as to not undermine the existing economy e.g. allowing a residential estate next to a farm, and ending up with the residents trying to limit farming operations as they object to the noise or smell of the pesticides.</p>	<p>The detailed concept and land uses related to rural development areas will be unpacked in detail in the OGMS and may include tourism facilities, rural residential opportunities, intensive agriculture etc. The extent of the impact positive or negative will be assessed during the required statutory land use application and NEMA EA processes. This will include mitigation measures and alternatives. The range of items to be cautious of are well understood and noted.</p>
<p>2.16 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>"Part 5: Planning Proposals and Strategies: Local Level" Arabella and Benguela Cove "Plan 51: 2050 Spatial Proposal Arabella and Benguela Cove", makes reference to a "Rural Edge". The SDF needs to set out what a "rural edge" is and what the implications are of such an edge. The National Spatial Development Framework also refers to a "rural edge", which is used to protect an area or region that has distinct rural qualities from "intruding uses". Should the reader interpret this rural edge to be the same as that in the NSDF? It is noted that the delineation of the 2050 rural edge is the same as the 2020 urban edge shown on Plan 52, with the only difference being in the naming of the edge.</p>	<p>Noted. Rural edges amended to 'urban edges' for the two development areas.</p>
<p>2.17 Environmental Affairs and Development</p>	<p>Fisherhaven / Hawston Under the heading "New Urban Development" on page 196, it is stated that the Greater Hermanus housing need for 2031 is foreseen to be 11 234 units, which translates to an area requirement of approximately 749ha</p>	<p>The writer's comment is incorrect, based on an incorrect assumption/misinterpretation of the text. The facts being that on page 80 it stated that the total shack count for Zwellihle consisted of approximately 4261 informal structures in 2018. It further states on page 80 that the future</p>

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<p>Planning Directorate: Spatial Planning</p>	<p>based on a density of 20du/ha. However, on page 80, these same figures are given to accommodate the future projected housing need for Zwellie alone. According to what is stated on page 80, 35 517 additional dwelling units will be needed by 2031 for the Greater Hermanus area. This discrepancy in numbers needs to be checked and the text amended as the implications for future land requirements are significant. It is acknowledged that a significant portion of the Greater Hermanus housing need is to be accommodated in the Fishervlei/Hawston area.</p>	<p>projected housing need, informed by (not solely based on) the said amount of informal structures, will amount to 7 127 by 2021 and 11 234 by 2031. This relates to a required land area of approximately 356ha by 2021 and 562ha by 2031 based on a density of 20du/ha.</p> <p>Therefore the statement on page 196 is correct- the shack count alone was not the sole basis used to determine the need.</p>
<p>2.18 Environmental Affairs and Planning Directorate: Spatial Planning</p>	<p>Greater Hermanus</p> <p>The "Hermanus Central Spatial Proposal 2020", Plan 58, on page 205 shows a 423.85ha area delineated with an "Urban-Rural Development Boundary", for the Hemel and Aarde Valley. Whilst this Department would support tourism facilities in this Valley, we do not support the development of rural residential settlements. These settlements are invariably enclaves for the wealthy, which undermine any attempts to facilitate integration and the transformation of existing racially divided settlements. In addition, as has been mentioned previously they tend to be marketed to the Municipality on the basis of the additional rates they will generate. In particular, the long term financial and other costs to the municipality are seldom unpacked and addressed in the development applications. The SDF appears to be missing a 2050 Spatial Proposal Map for Hermanus Central. (There are 2050 maps for Hermanus West and Hermanus East)</p>	<p>The comment by the Department re. the enclave for the wealthy and racial divided settlement area is inappropriately emotive, politically loaded, and is disregarded.</p> <p>It is noted that tourism related development would be supported, but rural residential development is not excluded as a potential land use, notwithstanding the Department's opinion. The free market needs to cater for all income types and investment related to these developments and to state that to provide such uses undermines transformation of existing divided settlements is ill-informed. It is furthermore most concerning that the Department implies that high income rural residential area inhabitants are associated with race.</p> <p>There are various types of development/ land uses and spatial patterns within any given municipality, some which will (as is also prioritised by this MSDF) effect spatial justice and others which will not.</p> <p>The Department also seems to ignore potential positive resulting socio-economic opportunities associated with these types of developments.</p> <p>The Hermanus East Plan was revised to include the Urban Rural Development Boundary.</p> <p>Please note that the 2050 vision maps include Hermanus Central areas, however the extents for the 2050 maps differ from the proposal maps as they contain less detail.</p>
<p>2.19 Environmental Affairs and Planning Directorate: Spatial Planning</p>	<p>Greater Gansbaai</p> <p>The extent of land included in the Greater Gansbaai urban edge is approximately 2500 ha, with significant portions of this made up of "Sensitive Development Areas" and "Ecological Corridors". The Status Quo section of this SDF is not clear on the additional land for housing that will be needed to accommodate the anticipated population growth up to 2031. Numbers are given in the Status Quo section, but what is not clear is whether these numbers are for the Greater Gansbaai area, or the town of Gansbaai itself. It is suggested that the Status Quo numbers be reworded so that there is no confusion around what is being referred to. Regardless of how much land is anticipated to be needed to accommodate the population growth, the extent of the current urban area is excessive. The edges should be brought in to be in line with the extent of the built up areas, rather than including vast tracts of undeveloped land.</p>	<p>The urban edge was significantly reduced to the east of Gansbaai, but remains extensive due to the amount of sensitive development area located in the proposed new urban development area. The net developable area is likely to prove much smaller based on the outcome of statutory planning and NEMA EA applications. This aspect was accommodated when the development area was delineated and is regarded as pragmatic and progressive.</p> <p>The numbers are as for Hermanus, based on the available statistics for Main Places (i.e. Includes the Greater Gansbaai).</p>
<p>2.20 Environmental Affairs and</p>	<p>Pearly Beach</p> <p>Plan 67: Pearly Beach Spatial Proposals 2020, indicates a "New Urban Infill" area of 21,08ha. This despite the</p>	<p>As stated available developable urban land for potential development is an extremely scarce commodity within the Overstrand. This indeed leads to a situation where urban land shortages in nearby settlements are often</p>

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<p>Development Planning Directorate: Spatial Planning</p>	<p>fact that the status quo section of the SDF states that no additional land for development is required. The reason provided in the SDF as to why this additional land is needed, is because there are land constraints in most other settlements in the Overstrand and Pearly Beach has land available to accommodate the Overstrand / Greater Gansbaai housing need. Providing housing / housing opportunities in Pearly Beach simply because there is land available, is not sustainable and should not be supported. In order to create a sustainable, well-functioning settlement, there need to be jobs, facilities and services, available land is only one aspect to be considered.</p>	<p>addressed/provided in other urban settlements, including housing and community facilities. It should be highlighted to the Department that the MSDF specifically stipulates and illustrates that its proposed New Urban Infill Areas are purposed for residential, community facility as well as mixed use development. This in itself is a significant attempt towards creating sustainable human settlements.</p>
<p>2.21 Environmental Affairs and Development Planning Directorate: Spatial Planning</p>	<p>The Capital Expenditure Framework (CEF) The CEF contained within the SDF is presented at a very high level. Whilst it is acknowledged that an attempt has been made to determine the funding gap between required municipal services and the affordability envelope of the Municipality, this is insufficient. No indication is provided as to where the Priority Development Areas are for investment i.e. no spatial guidance around what to invest where, is provided. It is noted that Overstrand Municipality has been prioritized for assistance to prepare the CEF. There are however certain minimum requirements that must be contained with the SDF to assist with the CEF development. The SDF must spatially identify the following to enable the preparation of a CEF:</p> <ul style="list-style-type: none"> • Functional areas and priority development areas. • The hierarchy and/or typology of priority development areas. • Population, household growth, economic activity and housing demand trends/ projections • Anticipated land required across land uses to meet this demand • Land available for development (current and future) • Land use mixes and development yields linked to this projected demand • The status of bulk infrastructure systems and facilities capacities etc. • Location or locational requirements for new bulk and social infrastructure • Backlogs (community, social and infrastructure) • Confirm/ identify MSDF land and growth policies, spatial transformation proposals and recommended phasing • identify where/ what land should be acquired/ released for development and what type of development • With reference to an existing LTFP, the current long term funding outlook, constraints and opportunities in the municipality • Possible spatial drivers of municipal costs • Current municipal, provincial and national government planned investments in the municipal area over the MTREF period. 	<p>The Municipality is not in agreement with the detailed information requirements of a CEF. The key reason being that the projects vary in terms of priorities, locations etc. A SDF can only be reviewed annually and more regular changes in projects will require onerous changes in the SDF delaying projects and much needed development. This is the stance of the Municipality, but it will as rightly stated by the Department partake in a process of revising its CEF. The CEF will for this MSDF be retained as is, as a first 'stab'. It may potentially be revised following the outcome of the engagement with the Department during the next revision opportunity.</p>
<p>3. WCPG- Department of Transport and Public Works - Directorate: Transport Policies and Strategies</p>		
<p>3.1 WCPG Department of Transport and Public Works - Directorate: Transport Policies and Strategies</p>	<p>Input from the Provincial Department of Transport and Public Works - Directorate Transport Policies and Strategies Page 8: List of statutory local policies under consideration for the SDF Suggestion: List of statutory local policies under consideration for the SDF</p>	<p>Comment unclear</p>
<p>3.2 WCPG Department of Transport and</p>	<p>Input from the Provincial Department of Transport and Public Works - Directorate Transport Policies and Strategies</p>	<p>With reference to the strategic nature of the MSDF, the preferred alternative of the Hermanus By-Pass Road has been added to all relative plans.</p>

<p>Public Works - Directorate Transport Policies and Strategies</p>	<p>General Comment: The Overstrand Integrated Transport Plan (ITP) is currently being fully reviewed by the municipality as part of the Overberg District Integrated Transport Plan (DITP) update.</p> <p>Suggestion: Key findings and recommendations from the ITP should be considered in the SDF.</p>	<p>More detailed provisions are rightly contained in the ITP and cannot be included in the MSDF proposals.</p> <p>Reference is, however, made to the ITP in the MSDF Action plan being the implementation vehicle of the MSDF.</p>
<p>3.3 WCPCG Department of Transport and Public Works - Directorate Transport Policies and Strategies</p>	<p>Input from the Provincial Department of Transport and Public Works - Directorate Transport Policies and Strategies</p> <p>Page 153 (4.3.2): Mixed-use densification strategy</p> <p>Suggestion: The densification strategy should be specified to be planned along strategically articulated transit corridors.</p>	<p>The proposal for densification along strategic transit corridors is supported in principle. This forms part of the broad mixed use densification of the Municipality. The GMS provides the level of detail the Department refers to and should be consulted in this regard.</p>
<p>3.4 WCPCG Department of Transport and Public Works - Directorate Transport Policies and Strategies</p>	<p>Input from the Provincial Department of Transport and Public Works - Directorate Transport Policies and Strategies</p> <p>General Comment: The Overstrand SDF should take cognizance of the Provincial Sustainable Transport Programme (PSTP)</p> <p>Suggestion: The Western Cape has identified Overstrand Municipality as a partner to jointly achieve the objectives of the PSTP. One of the key outcomes of the PSTP initiatives was an Overstrand Sustainable Transport Plan (OSTP). The plan was jointly developed by the Overstrand Municipality and the Western Cape Government and was endorsed by the Overstrand Municipal Council on 31 October 2018. The six strategies that are proposed by the OSTP include the following:</p> <ul style="list-style-type: none"> • The improvement of public transport and the enhancement of public transport facilities. (These facilities may need to be prioritised in the Capital Expenditure Framework component of the SDF?) • The promotion of NMT initiatives and the improvement of the associated infrastructure. (Once again, this may need to be prioritised in the Capital Expenditure Framework component of the SDF?) • Encouraging smarter choices by transport users through education and awareness campaigns. • Efficient road and effective traffic management. • Integrated development planning. • The municipality should engage the Western Cape Department of Transport and Public Works (DTPW) in this regard. 	<p>The comments and suggestions are welcomed.</p> <p>The transport provisions contained in the MSDF are highly strategic in nature in order to keep the MSDF flexible and the detail relating to the items listed cannot at this stage be included in the CEF. This component may, however, be expanded on in future and the Municipality offered to take part in an initiative to compile a CEF in collaboration with DEADP. At that stage the proposal of including NMT and infrastructure improvement can be revisited.</p> <p>Insofar as traffic management and awareness programmes are concerned, these do not form part of the scope and purpose of an MSDF, although being significant aspects required to inform detail planning.</p> <p>Integrated development planning is key to the MSDF proposals, not only in terms of creating integrated green systems, but also mixed land uses and densification as growth management strategies.</p>
<p>3.5 WCPCG Department of Transport and Public Works - Directorate Transport Policies and Strategies</p>	<p>Input from the Provincial Department of Transport and Public Works - Directorate Transport Policies and Strategies</p> <p>General Comment: P 162 + p 174 + p214 –New Urban Development areas proposed on the peripheries of the Rooiels, Stanford and Betty's Bay areas</p> <p>Suggestion: Full traffic impact assessments should be conducted. The developments should prioritise non-motorised transport (NMT) infrastructure and safe access for pedestrians and cyclists.</p>	<p>New Urban Development areas are areas earmarked for a broad range of development with the precise land use mix and extent yet to be determined.</p> <p>This TIA detail assessments will be undertaken during the review of the engineering master plans as well as continuously during land use planning/ NEMA processes as/when development detail becomes available.</p>

<p>3.6 WCPG Department of Transport and Public Works - Directorate Transport Policies and Strategies</p>	<p>Input from the Provincial Department of Transport and Public Works - Directorate Transport Policies and Strategies Page 3: Spatial Sustainability (settlements focus area) Suggestion: Development initiatives must be linked to transit corridors for integration of land-use and transport.</p>	<p>The OGMS is the vehicle providing the detail in this regard.</p>
<p>3.7 WCPG Department of Transport and Public Works - Directorate Transport Policies and Strategies</p>	<p>Input from the Provincial Department of Transport and Public Works - Directorate Transport Policies and Strategies Page 4: Spatial resilience (environment focus area) Suggestion: Disaster management plans must link with transport disaster management plans through the ITP and PRMCC to coordinate efforts for evacuation and emergency response.</p>	<p>It is unclear how this comment relates to the MSDF.</p>
<p>3.8 WCPG Department of Transport and Public Works - Directorate Transport Policies and Strategies</p>	<p>Input from the Provincial Department of Transport and Public Works - Directorate Transport Policies and Strategies General comment: The IDP of the Overstrand Municipality lists various energy targets under its strategic directives which encourage the rollout of various transport infrastructure initiatives, particularly to support walking and cycling, park and ride facilities and public transport ranks. Suggestion: These should be considered within the SDF.</p>	<p>The IDP is the correct vehicle to contain the role-out of projects. The MSDF forms part of the IDP. It does not make provision for this level of detail. It rather focuses on providing a strategic future spatial development pathway on a Municipal and per settlement scale. High level of detail may be considered for provision in the revised HSP/GMS.</p>
<p>4. WCPG Department of Transport and Public Works - Directorate Infrastructure Policies and Strategies</p>		
<p>4.1 WCPG Department of Transport and Public Works - Directorate Infrastructure Policies and Strategies</p>	<p>Input from the Department of Transport and Public Works - Directorate Infrastructure Policies and Strategies Part 1: Introduction 1.1 Background Page 1 "To compile the Municipal Spatial Development Framework (MSDF) in such detail, to enable future motivation to the Department of Environmental Affairs and Development Planning (DEA&DP), for all land within the new urban edge to be approved as urban areas in terms of the National Environmental Management Act, 1988 (NEMA). The municipality should be upfront about the reasons it deems the future expansion of the urban edge necessary. The above statement is vague and should perhaps be removed from the introduction and be discussed in detail in Section 5 of the OMISDF. Section 5 deals with Planning Proposals and Strategies at a local level in Overstrand Municipality. Suggestion: The development of sustainable human settlements prioritise citizen need and considers the total cost to government. Therefore, the Department of Transport and Public Works (DTPW) advises that all vacant land within the existing urban edge be developed as far as possible before considering the further expansion of the urban edge.</p>	<p>Although the terms of reference included deriving a mechanism to exclude areas from NEMA EA requirements, it was realised through the process that this is highly unlikely to be achieved. This component was therefore omitted from the ToR by the Municipality. The comment that all vacant land within the settlements should first be developed prior to the extension of the urban edges is ill-informed. Many of the vacant land is in private ownership, conservation worthy, of heritage importance or constraint in terms of development potential. The Overstrand's growth management strategy includes both densification, to optimise land within the urban edges as well as the extension thereof where required.</p>

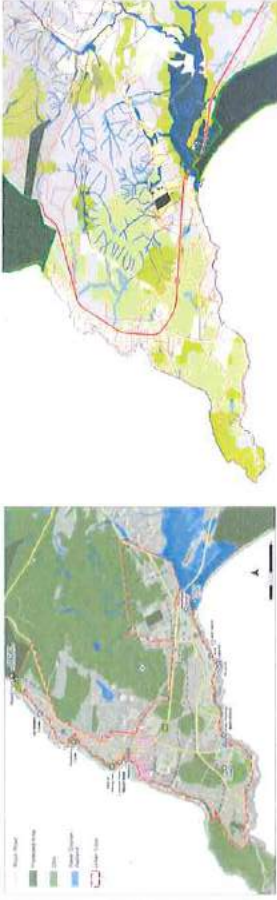
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<p>4.2 WCPG Department of Transport and Public Works - Directorate Infrastructure Policies and Strategies</p>	<p>Input from the Department of Transport and Public Works -Directorate Infrastructure Policies and Strategies</p> <p>2.3 Statutory Policy Context Page 8</p> <p>This section lists the National, Provincial, District and Local policies that have been considered and included in the OMSDF. However, the National Spatial Development Framework (NSDF) is not included in this section.</p> <p>Suggestion: The MSDF provides a spatial transformation plan from a national government perspective. The OMSDF should consider the NSDF's plans and possible linkages with projects that can be leveraged to access funding and reduce socio-economic challenges in the municipality.</p>	<p>The provisions of the NSDF have been worked into the MSDF based on this comment.</p>
<p>4.3 WCPG Department of Transport and Public Works - Directorate Infrastructure Policies and Strategies</p>	<p>Input from the Department of Transport and Public Works -Directorate Infrastructure Policies and Strategies</p> <p>2.4.2 Demographics: An Introductory Synopsis Page 15 -16</p> <p>The municipality developed their own methodology for projecting population growth. For aligned and improved service delivery, it is necessary for all stakeholders to use the same baseline information to plan for communities. Therefore, DEA&DP compiled population projections for all government stakeholders to use.</p> <p>Suggestion: To ensure consistency and the alignment of plans across government spheres and departments, the municipality should consider using the DEA&DP population projections.</p>	<p>The methodology used by the Provincial government should firstly be compared to that followed by the specialist appointed to provide input to the MSDF. Should the outcome of a comparative analysis prove that Provincial Government's projections need to be used, then amendments to the MSDF could be made only during the next annual review process.</p> <p>This MSDF will therefore not at this stage base its provisions on a database other than the specialist reports compiled by Multi Source Business Solutions (Dr. J. Bloom).</p>
<p>4.4 WCPG Department of Transport and Public Works - Directorate Infrastructure Policies and Strategies</p>	<p>Input from the Department of Transport and Public Works -Directorate Infrastructure Policies and Strategies</p> <p>2.4.3 Selected Statistics: Overstrand Municipal Area (2011-2016) Page 17</p> <p>Reference is made to the "Eden District". The "Eden District" has been renamed as the "Garden Route District".</p> <p>Suggestion: It is recommended that references to the "Eden District" be replaced with the "Garden Route District Municipality" throughout the document.</p>	<p>Noted. Reference has been amended.</p>
<p>4.5 WCPG Department of Transport and Public Works - Directorate Infrastructure Policies and Strategies</p>	<p>Input from the Department of Transport and Public Works -Directorate Infrastructure Policies and Strategies</p> <p>5.8.3 Greater Hermanus 2020-2030 MSDF Spatial proposals (West, Central and East) Page 204 – 206</p> <p>The OMSDF indicates the Zweilinde as a high-density area (statistics provided on page 19 and 20). The land invasion of an old dump mound called Marikana is also mentioned in the OMSDF. However, no indication of plans or proposals to address informality in the area is included in the document.</p> <p>Suggestion: The OMSDF indicates that 60% of dwellings in Zweilinde is formal and the area has densities of 8615 persons per square kilometre. The high densities indicated in the Zweilinde are raised as a concern. However, the OMSDF does not contain plans or proposals to address this situation. It is therefore recommended that OMSDF references relevant information from its Human Settlements Plan (HSP) on how it intends to deal with the high densities in informal settlements in the municipality.</p>	<p>The Human Settlement Plan is indeed the vehicle which needs to outline the exact measures and interventions to be taken in order to manage the Municipality's housing need.</p> <p>The MSDF is a strategic document outlining the spatial proposals for the Municipality and its settlements on a broad level. The MSDF does not provide the level of detail requested by the Department, and reference will be added to guide the reader to visit the HSP which needs to be updated following adoption of the MSDF.</p>

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5. WCPG Department of Public Works: Road Network Management	
<p>5.1 WCPG Department of Public Works: Road Network Management</p>	<p>The SDF does not include any reference to the proposed Central Business District (CBD) bypass road that has been proposed by the Branch to address the long-term transport infrastructure needs of the municipality in response to growth and development. The bypass is approximately 3 km long and will form part of the realigned R43 to the north of CBD, abutting Mountain Drive, past Hermanus Sports Complex and along Fairways avenue. The project is currently undergoing an EIA and is critical to maintaining a balanced network in terms of mobility and access.</p>
<p>5.2 WCPG Department of Public Works: Road Network Management</p>	<p>In terms of the South African Road Classification and Access Management Guidelines (RCAM), the R43 is defined as a Class 2: Major Arterial and as such is required to fulfil an important mobility function. Such corridors are critical to ensuring the efficient movement of goods and services across the province and create an environment conducive to economic growth.</p>
<p>5.3 WCPG Department of Public Works: Road Network Management</p>	<p>In addition to the CBD bypass proposal, the Overstrand Transport Plan makes reference to a number of proposals that are critical to addressing the long-term transport infrastructure needs of the municipality that are not included in the SDF. The proposals include the following:</p> <p>The future grade separation of the R43/ R44 intersection should be accepted as an integral part of the long-term planning for the road network in this area.</p> <p>Develop a parallel route between Hawston and Vermont to provide connectivity for local traffic and public transport, thereby preserving the mobility on the R43 for longer distance through traffic.</p> <p>Finalise the planning of the parallel road scheme between Onrus and Sandbaai and proceed with the design of the new Onrus River bridge crossing. Possible solutions at the R43/ Onrus Main Road intersection should be considered and developed in greater detail.</p> <p>Bergsig Street should be extended 130m westwards to enable closure of the Habonim access.</p> <p>The proposed extension of Schulphoek Road and its connection with Church Street should be included in future Integrated Transport Plans for the region.</p> <p>The authorities should examine the need for and feasibility of setting aside sufficient land for the long-term future grade separation of the R43/ Sandbaai Main Road intersection.</p> <p>Extend the parallel link road from Swartdam Road to Prellewitz Road.</p> <p>Prellewitz Road should be re-aligned creating a continuous ring road between Mountain Drive and Church Street.</p>
<p>5.4 WCPG Department of Public Works: Road Network Management</p>	<p>The Overstrand Transport Plan also proposes a number of strategies that should be implemented to manage the impact of growth and development on the transport network that have not been included in the SDF. This includes:</p> <p>Future ribbon development between Botriver and Fisherhaven should be discouraged in order to protect the functional classification of the R43 and its uninterrupted mobility objectives.</p> <p>Develop a comprehensive and integrated land use and transport growth management plan for the Hawston – Hermanus corridor with emphasis on maintaining future mobility.</p> <p>Land use developments at Fisherhaven and Hawston should not be allowed to leapfrog across the R43 until all available development opportunities west of this road have been exhausted.</p>
<p>The By-Pass Road alignment (preferred) alternative has been added to all relevant plans.</p>	<p>The comment is noted.</p>
<p>The SDF is strategic in nature as outlined in the introduction of this report and supported with detailed, focused Council policies and plans which are to be consulted in parallel with the MSDF.</p> <p>The detail listed by the Department is rightly contained in such a Council plan (i.e. the Overstrand Integrated Transport Plan). It cannot be duplicated on this level in the MSDF as this will entail ad hoc amendments to the MSDF based on changes in scopes and/or implementation of projects.</p> <p>The information will, however, inform the planning process when development stages are reached and will be required to be consulted by applicants and the Municipality. Future registered cadastral boundary changes captured on the Municipal GIS database will also be use/reflected on local level MSDF plans.</p>	<p>The urban edge of Fisherhaven contains development and restricts expansion towards Botriver entirely.</p> <p>The proposal for an integrated growth management plan for the "Hawston-Hermanus" corridor is welcomed. This needs to be updated as part of the revision of the GMS following of which some of the proposals might be included in the strategic MSDF on a broad scale. The proposal has been included in the MSDF Action Plan. The new development area which will function to accommodate, amongst other, the Hermanus housing need, is proposed to also encompass an extensive area to the east of the R43. Development will take place on both sides of the R43 with the exact location and implementation subject to detailed planning processes. Restricting development as per the Department's comment is therefore not supported.</p>

<p>6. Cape Nature</p>	
<p>6.1 Cape Nature</p>	<p>It is noted that the mapping indicated in the SDF uses the 2010 Western Cape Biodiversity Framework. The 2010 WCBF took the separate maps for each district municipality and stitched them together to form a provincial map. The mapping for the Overberg District was undertaken by SANParks and was termed the Overberg Conservation Plan.</p> <p>In 2017, CapeNature in conjunction with the Department of Environmental Affairs and Development Planning released the Western Cape Biodiversity Spatial Plan (WCBSBP). Figure 1. and 2. below shows that the CBA information between these two publications differs.</p> 
<p>6.2 Cape Nature</p>	<p>The WCBSBP handbook provides a set of land use guidelines that should be used to effectively aid in conserving the biodiversity of the Western Cape. The BSP Map is the product of a systematic biodiversity planning approach that delineates Critical Biodiversity Areas and Ecological Support Areas, which require safeguarding to ensure the continued existence and functioning of species and ecosystems, including the delivery of ecosystem services. The WCBSBP replaces all previously published biodiversity informants to strategic forward planning and will be used in the revision of the Provincial Spatial Development Framework.</p>
<p>6.3 Cape Nature</p>	<p>The Overstrand Spatial Development Framework document mentions Critical Biodiversity Areas (CBAs) but the CBAs indicated on the spatial plans for each town are not the most recently available (i.e. they are not the 2017 WCBSBP CBA layer). The importance of Ecological Support Areas (ESAs) also needs to be emphasised in the document. ESAs are areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of Protected Areas (PAs) or CBAs, and are often vital for delivering ecosystem services. They support landscape connectivity, encompass the ecological infrastructure from which ecosystem goods and services flow and strengthen resilience to climate change. They include features such as regional climate adaptation corridors, water source and recharge areas, riparian habitat surrounding rivers or wetlands, and Endangered vegetation.</p>
<p>6.4 Cape Nature</p>	<p>Protection and appropriate management of CBAs and ESAs is a vital part of increasing resilience to climate change and this link should be explained in the SDF. The impacts of climate change pose significant threats to basic provisions for life including water, the environment, and food production.</p>
<p>All plans have been updated and are consistent with the Western Cape Biodiversity Spatial Plan (WCBSBP) information.</p>	<p>Noted. As stated, the relevant plans have been updated with WCBSBP information.</p>
<p>Noted. As stated, the relevant plans have been updated with WCBSBP information.</p>	<p>Noted. As stated, the relevant plans have been updated with WCBSBP information.</p>
<p>The aspects of climate change are addressed in the Overstrand Environmental Management Plan (Municipal Wide). The coastal management lines are indicated on all the relative spatial proposal plans, informed by the Western Province's Coastal Management Information, which in turn was informed by climate change and related aspects.</p>	<p>The aspects of climate change are addressed in the Overstrand Environmental Management Plan (Municipal Wide). The coastal management lines are indicated on all the relative spatial proposal plans, informed by the Western Province's Coastal Management Information, which in turn was informed by climate change and related aspects.</p>

<p>6.5 Cape Nature</p>	<p>The Western Cape is anticipated to become drier, intensifying stress on the Fynbos Biome. The result of this would be shrinkage of the Fynbos Biome which would be replaced by more arid biomes. Species distributions are therefore predicted to change; however, the mobility of the species distributions are fully dependent on the presence of intact corridors that can facilitate this movement. Species located in isolated fragments are likely to become extinct if they are unable to withstand the change in climate. Habitat fragmentation, caused by a variety of activities, has been identified as one of the greatest threats to biodiversity, as, amongst other things, it increases the vulnerability of ecosystems to climate change. Maintaining and enhancing habitat connectivity enables plant and animal communities to move and adapt in response to a changing climate. Creating functional connectivity in landscapes is a key aspect of promoting ecosystem resilience (the ability of the ecosystem to absorb a certain amount of change, yet still remain functional). Ecosystem resilience can be maintained or built through an approach that focuses on intact areas, maintaining biodiversity priority areas in a natural or near natural state, maximising connectivity between these areas and maximising the diversity of species and ecosystems.</p>	<p>The comment is noted, however, it is questioned why the importance of biodiversity and related corridors is referred to when it is abundantly clear/obvious that the Overstrand MSDP makes provision for numerous corridors on various scales pertaining to its rural and urban environments.</p> <p>The Overstrand Environmental Overlay Zones and EMF outlines numerous detailed biodiversity corridors. These amongst other link sensitive areas from mountain to coastline, through urban areas as well as within urban areas.</p> <p>The Overstrand spatial proposals were to a significant extent informed by these corridors which are most visible on the status quo plans and which were synthesised into sensitive development area designations on the spatial proposal plan sets.</p>
<p>6.6 Cape Nature</p>	<p>The WCBSPP analysis included detailed planning for securing a network of corridors across the province. Climate change adaptation features were integrated into a single climate change surface that was used in the spatial analysis. The selection of planning units for inclusion in Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) was thus 'skewed' towards areas that are important for climate change adaptation.</p>	<p>This information is noted.</p>
<p>6.7 Cape Nature</p>	<p>Decision-makers and planners can reduce the harmful impacts of climate change by integrating the BSP Map and guidelines into land use planning and decision-making, and by adhering to wise management guidelines, such as:</p> <ul style="list-style-type: none"> Identifying key climate adaptation corridors required for long term persistence of biodiversity pattern and process and implementing measures to protect the remaining corridor network particularly critical linkages, with biodiversity-compatible land uses; Maintaining intact riparian (river bank) and watercourse vegetation; Protecting water resources especially water source areas, watercourses and groundwater recharge areas; Managing invasive alien species; Implementing appropriate fire management; and Restoring and maintaining biodiversity for carbon storage. 	<p>The Overstrand Overlay Zone regulations address all of the items listed in detail, consisting of areas delineated on plans coupled with detailed regulations linked to specific objectives.</p> <p>The spatial provisions of the Overlay Zones substantially informed the delineation and compilation of the spatial proposals.</p>
<p>6.8 Cape Nature</p>	<p>In addition to safeguarding the environment, these measures can assist with disaster management, by reducing the vulnerability of human communities and built infrastructure to the impacts of natural disasters such as floods and droughts.</p>	<p>Comment noted.</p>
<p>6.9 Cape Nature</p>	<p>In the light of the above, from a biodiversity perspective, the following additions and edits are suggested to be made to the Overstrand SDF:</p> <p>The Overstrand SDF must be updated to take cognisance of the 2017 WCBSPP which includes not only the shapefiles and maps but also the management guidelines contained within the WCBSPP handbook. The SDF should include the definitions of ESA and the importance thereof. ESAs must be linked to ecological infrastructure.</p> <p>Spatial Planning Categories (SPCs) should be aligned to the WCBSPP category (refer to Table 4.4 in the WCBSPP 2017 Handbook).</p>	<p>i. - iv. The plans have been updated in accordance with the WCBSPP and ESA's. The areas earmarked for development and that for conservation is delineated in detail in the Overstrand Overlay Zone: Urban Development/ Conservation Areas and informed the sensitive development area designation of the MSDP proposals.</p> <p>Detail w.r.t. which open spaces are earmarked for development and which for conservation is not within the scope of the MSDP as a strategic spatial framework. As stated in the beginning of this report, the detail w.r.t. specific aspects within specific areas are contained in Council Policies – in this case to a certain degree in the Overstrand Environmental Overlay Zone Regulations.</p>

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	<p>Land use categories suitability with regard to each BSP category should also be aligned (refer to Table 4.6 and 4.7 in the WCBSF Handbook). A map should be provided showing all the WCBSF categories for the Overstrand. Municipality and surrounding municipalities. Another separate map should show which areas are earmarked for conservation (indicated as "areas to be conserved") and which CBAs may be desired for development (these should be indicated as potential conflict areas) and which areas are already developed or have environmental authorisation). A distinction needs to be made between Open Space that is intended for recreation versus those that will be conservation areas. Plan 6 should be replaced with the Western Cape Protected Area Expansion Strategy</p>	<p>Data for the Western Cape Protected Area Expansion Strategy could not be obtained; therefore the National Protected Area Expansion Strategy data was used. The Protected Areas layer however was updated on this plan with the WCBSF information.</p>
6.10 Cape Nature	<p>On page 252, CapeNature is mentioned as a lead department for procuring funding for the identification of areas for inclusion into already protected areas. CapeNature is guided by the Western Cape Protected Areas Expansion Strategy. The lead in a fundraising role would need to be agreed at an organisational level prior to it being incorporated into this SDF.</p>	<p>Noted. This has been revised.</p>
6.11 Cape Nature	<p>It is noted that Fernkloof Nature Reserve has been accurately reflected on pa 59 but on plan 56 Fernkloof does extend beyond to border Vogelgat Nature Reserve. The developments for Fernkloof in the SDF are in line with their Protected Area Management Plan.</p>	<p>The Fernkloof Reserve's delineation has been updated across all plans, and is based on the latest Overstrand Municipality data.</p>
6.12 Cape Nature	<p>As there are areas for development within the urban edge which lie in wetland areas, it is suggested that that special restrictions be imposed for proposed buildings in these areas. Point 4.3.6 Priority Areas for Biodiversity Conservation – this strategy should encompass all forms of stewardship as per appropriate for each site not limited to contract nature reserves signed up through CapeNature as this could be limiting.</p>	<p>These areas are protected by the Overstrand Environmental Overlay Zone regulations which are indeed area specific additional regulations to that of the Municipal Planning By-law. Noted - This has been updated accordingly.</p>
6.13 Cape Nature	<p>CapeNature supports the conservation areas in the west and the non-expansion of Rooiels, Betty's Bay and Pringle Bay settlements. The coastal urban sprawl and ribbon development is predominant for the area of Hermanus from the suburb of Fisherhaven through to Hermanus East (Points 7-9 on the Settlements map) and will be exacerbated with the proposal development areas for Fisherhaven-Hawston in this SDF. The areas identified for development in the Fisherhaven- Hawston suburbs conflicts with the maps portraying areas of conservation importance and also identified climate change corridors (WC PSDP). The proposed corridors run through areas marked for development so this is confusing. It should be noted that the Bot River estuary bordering this settlement is a RAMSAR site hence of international importance with associated reporting accountability. It would be preferable to investigate further spatial integration and densification of existing areas situated closer to the town centre e.g. north of the R43 above the Onrus/Vermont.</p>	<p>The comments regarding the environmental component within the area earmarked for New Urban Development is noted. Due to a severely restricted amount of land available for essential human settlement development etc, some environmental resources will have to be sacrificed. However, a SDF does not give rights or take rights away and the required statutory processes will have to be followed prior to development of any projects in terms of the applicable legislation. (i.e. EIAs may require biodiversity areas to be retained abutting/ within an urban development area).</p>
6.14 Cape Nature	<p>For the town of Betty's Bay, Stony Point and the extent of the protected area undergoing proclamation needs to be recognised on map Plan 45 as per Plan 44.</p>	<p>Noted, the plan was amended.</p>



6.15 Cape Nature	The area earmarked for development in the Gansbaai area also negates the current ecological process corridors and the proposed ecological corridors run directly through the development area (Plan 64) so clarity on this is required.	Due to a severely restricted amount of land available for essential human settlement development etc., some environmental resources will have to be sacrificed. However, a SDF does not give rights or take rights away and the required statutory processes will have to be followed prior to development of any projects in terms of the applicable legislation. (i.e. EIAs may require biodiversity areas to be retained abutting/ within an urban development area).
6.16 Cape Nature	More detail should be provided regarding the development zone marked Urban Development – RDA in the Hemel-en-Aarde Valley on Plan 58. It would be recommended that the functionality of corridors and riparian areas be maintained.	This is a strategic level of detail proposal of which the detail will be determined/ informed by various statutory process requirements before development can take place. These processes will inform the requirement for example preservation of natural areas, mitigation, etc.
6.17 Cape Nature	The developments for Hoek van den Berg, Arabella phase 2 and the Hermanus By-Pass road have not been noted in this SDF.	The Hermanus By-pass road has been added to all relevant plans. The proposed Hoek van den Berg development is still in the planning phase. This means the development cannot be indicated on the MSDF as it is not a statutorily formalised development.
7. DEADP Directorate: Biodiversity and Coastal Management		
7.1 DEADP Directorate Biodiversity and Coastal Management	Input from the Department of Environmental Affairs and Development Planning -Directorate Biodiversity and Coastal Management It is critical that the municipality ensures that all biodiversity information in the SDF be updated to match that which is contained in the Western Cape Biodiversity Spatial Plan of 2017, as this plan represents the most up-to-date scientific information.	The MSDF was updated with the latest biodiversity information based on comments received, being the WCBSF as per the Department's comment/request.
8. WCPG Department of Health		
8.1 WCPG Department of Health	Input from the Provincial Department of Health The needs/possible needs for the Overstrand area are as: <ul style="list-style-type: none"> • Betty's Bay- Bay Satellite Clinic- Replacement. The clinic is being relocated into bigger facility – negotiation around a lease is underway. • Gansbaai- Gansbaai Clinic- Upgrade and Additions. Additions are currently underway. • Hermanus- Hawston Clinic- Upgrade and Additions. The clinic will be extended in the future when required and in terms of priority. • Hermanus Hospital will be extended in the future only as and when required and in terms of priority. • Pearly Beach Satellite Clinic to be investigated for possible extension in future if so required. <p>The Department of Health is not in agreement with the additional number of Health Facilities as recommended (by the CSIR) in the SDF. The current number of facilities (plus the identified possible extensions above) is considered sufficient up to 2030. (Detail of how the required number of facilities is determined by the Provincial Department of Health, is Attached as Annexure B)</p>	This information is welcomed and will be used in the process of updating the Overstrand Growth Management Strategy (in process) as the higher level of detail spatial planning policy document which will reflect the detailed provisions of facilities on a local level. The CSIR categories were used as a first basis informant only and following detailed analysis these will be refined in the OGMS with amongst other the information provided by the Department. The request regarding the day centre will be addressed as part of the aforementioned process.

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	<p>It is important to note that the Hermanus Community Day Centre was built to serve a dependent population of 60 000. The SDF needs to clearly reflect what the anticipated future dependent population is for Greater Hermanus, to give the Department of Health time to prepare, should the Day Care Centre need to be extended, or an additional Centre added.</p>	
9. Engineering Department Overstrand Municipality		
9.1 Engineering Department Overstrand Municipality	<p>p.37 par. 2.6.1: Usage from De Bos Dam is supplemented by 1.6 million m³/a of groundwater from the Gateway well field as well as 1.2 million m³/a from the Camp Hill and Volmoed well fields in the Hemel en Aarde Valley;</p>	<p>The MSDF report has been revised based on the information provided.</p>
9.2 Engineering Department Overstrand Municipality	<p>p.62 Plan 21: of OM's 6 waste water treatment works it appears that only the Pearly Beach WWTW is indicated on the plan;</p>	<p>Plan was updated with the GIS water layer on Overstrand Municipal Server.</p>
9.3 Engineering Department Overstrand Municipality	<p>p.67 third bullet, last sentence: there are no plans or requirement to build an additional water treatment plant for Pringle Bay - this sentence can be deleted;</p>	<p>Noted the sentence was omitted</p>
9.4 Engineering Department Overstrand Municipality	<p>p.70 Bettiesbaai 3rd bullet, add: continuation of replacement of old water network pipelines is needed to reduce the high water losses;</p>	<p>The MSDF report has been revised based on the information provided.</p>
9.5 Engineering Department Overstrand Municipality	<p>p.74 Kleinmond 3rd bullet: the Kleinmond waste water treatment works is in need of capacity upgrade and refurbishment. The sewer network is being extended (contractor on site); p.74 Kleinmond 4th bullet; change to: The solid waste transfer station at Kleinmond has been repaired and upgraded and has sufficient capacity;</p>	<p>The MSDF report has been revised based on the information provided.</p>
9.6 Engineering Department Overstrand Municipality	<p>p.76 Benguela Cove, last sentence: With the prolonged drought resulting in the low level of the municipality's dam at Fisherhaven, Benguela Cove requires alternative irrigation water. The supply of treated effluent from the Hawston WWTW for this purpose is being investigated;</p>	<p>The MSDF report has been revised based on the information provided.</p>
9.7 Engineering Department Overstrand Municipality	<p>p.78 Fisherhaven 3rd bullet: The limited sewer network in Fisherhaven is linked to the Hawston waste water treatment works via a pump station and rising main pipeline. The sewer network however need to be extended; p.78, Hawston 3rd bullet: this comment is not valid. Hawston is supplied with water from the same sources and water treatment plant (Preekstoel) as the rest of the Greater Hermanus area. This comment applies to the entire area.</p>	<p>The MSDF report has been revised based on the information provided.</p>

9.8 Engineering Department Overstrand Municipality	p.86 Hermanus East, 4th bullet: this comment is not valid. The area is served by the Hermanus Waste Water Treatment Works, which has adequate capacity for many years into the future;	The MSDF report has been revised based on the information provided.
9.9 Engineering Department Overstrand Municipality	p.84, 86: additional bulk water sources will have to be developed in the medium term. A recent feasibility study indicated seawater desalination to be the preferred option;	The MSDF report has been revised based on the information provided.
9.10 Engineering Department Overstrand Municipality	p.89 Stanford 3rd bullet: the upgrade of the WWTW has been completed;	The MSDF report has been revised based on the information provided.
9.11 Engineering Department Overstrand Municipality	p.92 De Kelders, last bullet should read: Gansbaai landfill site; not drop-off;	The MSDF report has been revised based on the information provided.
9.12 Engineering Department Overstrand Municipality	p.95 Gansbaai, add: the Gansbaai solid waste landfill site has adequate capacity for the next 13 years;	The MSDF report has been revised based on the information provided.
9.13 Engineering Department Overstrand Municipality	p.102 Baardskeidersbos 2nd bullet: there is no existing WWTW to connect to. A sewer network and WWTW will have to be developed for the village;	The MSDF report has been revised based on the information provided.
9.14 Engineering Department Overstrand Municipality	p.103 Buffe Jagsbaai: the last sentence is not valid. The village is supplied with bulk water from a municipal bore hole into a reservoir and reticulation network. The raw water quality requires some form of treatment in future. In terms of waste water the village is served with conservancy tanks;	The MSDF report has been revised based on the information provided.
9.15 Engineering Department Overstrand Municipality	p.120, LO1: add WSDP under "policies and key policy informants"?	The MSDF report has been revised based on the information provided.
9.16 Engineering Department DM	p.122, LO9: add WSDP under "policies and key policy informants"?	The MSDF report has been revised based on the information provided.

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<p>10. Overstrand Municipality Directorate Infrastructure and Planning: Building Control</p>	<p>>>> Louis Coetzee 04/06/20 1:03 AM >>> OVERSTRAND MUNICIPALITY DRAFT SPATIAL DEVELOPMENT FRAMEWORK: BUILDING CONTROL COMMENT</p> <p>The (draft) Heritage Protection Overlay zones are supported by Building Control, particularly the protection and utilisation of heritage buildings in the Overstrand area. The Heritage Committee was also informed of the opportunity to comment and we hope they use this opportunity.</p> <p>In an unrelated SDF matter, the Building Control Department will greatly appreciate any guidance from the Town Planning Department regarding the implementation of the HPOZ approval/consent by Town Planning during the building plan evaluation process.</p> <p>p245 "Property Development and Public-Private Partnerships". "Encourage new development design concepts that incorporate natural areas in layouts and complement the natural environment by introducing eco-architecture/green building designs".</p> <p>Building Control not only supports eco-architecture/green building design, but we also support eco-tourism. Eco architecture and green building design include pre-fabrication (also refer to https://constructingexcellence.org.uk/rethinking-construction-the-egan-report) as sustainable building practice and minimises the physical environmental footprint. The design process involves weighing pre-fabrication with local manufacturing and construction material suppliers.</p> <p>At present, pre-fabrication (i.e. containers) is not popular with Building Control and Town Planning Departments: Building Control and Town Planning Departments need to be aware that prefabrication is a sustainable building practice, when assessing future building and Town Planning applications.</p> <p>In conclusion, the Building Control Department supports the Draft Spatial Development Framework.</p> <p>Louis Coetzee Manager: Building Control Directorate Infrastructure and Planning Overstrand Municipality T: +27 (0) 28 313 8091 F: +27 (0) 28 313 2962 Overstrand Municipality 1 Magnolia Street, Hermanus, 7200 P.O Box 20, Hermanus, 7200 T +27 (0) 28 313 8000 F +27 (0) 28 312 1894 E enquiries@overstrand.gov.za W www.overstrand.gov.za</p>	<p>The Overstrand Department Building Control numerous comments in support of the MSDP provisions are noted.</p>
<p>11. Giorgio Lombardi MSC</p>	<p>Plan 3: Vogelgat Nature Reserve which abuts directly onto Fernkloof Nature Reserve has been left blank. We are in fact a stewardship contractual nature reserve with Cape Nature. I too notice that along the Klein River mountain NO conservancies have been added. Please consult the local Cape Nature office in this regard.</p> <p>The Vogelgat river has not been added to the plan. It forms an important ecological system for the Klein River Estuary and should be added.</p>	<p>Plans have been updated with the WCBSF information *Vogelgat Nature Reserve now included</p>

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11.2 Giorgio Lombardi MSc	Plan 4: Notes as above for Vogelgat not represented. Area below R43 demeaned "area where no natural habitat remains" this is untrue, and the municipality is busy incorporating these erfen into Fernkloof Nature Reserve	Plans have been updated with the WCBSF information. *Vogelgat Nature Reserve now included *Areas where no natural habitat remains" have been compiled using land cover data from SANBI and include the following layers: Cultivation, Degraded, Urban Built-up and Plantations.
11.3 Giorgio Lombardi MSc	Plan 5: Klein River conservancies not depicted.	Plans have been updated with the WCBSF information *Klein River conservancies should now be included.
11.4 Giorgio Lombardi MSc	Plan 6: Vogelgat Nature Reserve does not have to be included. It is already a stewardship contractual reserve. The entirety of Fernkloof Nature has not been included here especially the erfen from Prawn Flats to Maanschnynbaal.	Plans have been updated with the WCBSF information *Fernkloof Nature Reserve boundaries updated
11.5 Giorgio Lombardi MSc	Plan 7: Vogelgat again not depicted as a protected area and erfen of Fernkloof east of Prawn Flats not included as protected.	Plans have been updated with the WCBSF information *Vogelgat included as a protected area *Fernkloof Nature Reserve boundaries updated
11.6 Giorgio Lombardi MSc	Plan 12: the protected areas as Fernkloof, Vogelgat and Maanschnynkop Nature reserves serve as natural mountain catchment areas. This plan omits these.	The areas have now been added to ensure all conservation worthy areas are illustrated in the SDF.
11.7 Giorgio Lombardi MSc	Plan 14: Vogelgat River not represented here. It is an important river system for Vogelgat Nature Reserve and the Klein River estuary.	The Vogelgat river has been added to the plan.
11.8 Giorgio Lombardi MSc	Plan 15: Klein River conservancies not depicted here.	The Klein River Conservancies forms part of the Coastal Protection Zone EMOZ and is therefore not duplicated as conservation areas on this plan.
11.9 Giorgio Lombardi MSc	Plan 16: The area east of Hermanus has not been depicted green for a mountain catchment area.	These areas have now been indicated as part of all conservation areas within the Overstrand although same are protected areas in terms of the Overlay Zone Regulations.
11.10 Giorgio Lombardi MSc	Plan 17: once again Vogelgat not designated Protected area	Plans have been updated with the WCBSF information *Vogelgat included as a protected area
11.11 Giorgio Lombardi MSc	Plan 18: Walker Bay Nature Reserve depicted as marginal potential arable land. This area should be RED – Wilderness. As it is a provincial protected area. The areas below Fernkloof Nature Reserve, Vogelgat and Maanschnynkop Nature Reserve are not moderate potential arable land. These areas should be RED – Wilderness as the form part of proclaimed nature reserves.	The information depicted on the plan was obtained from the Department of Agriculture, Forestry and Fisheries (DAFF) This can only be amended by official ground truthing by the delegated authority and will therefore remain as is for the purpose of this MSDF.
11.12 Giorgio Lombardi MSc	Plan 29: I would suggest that town names be inserted so the reader does not have to guess where this plan is in relation to the whole.	Hermanus West Status Quo and Proposal plans – Town names inserted

11.13 Giorgio Lombardi MSc	Plan 31: The Vogelgat River should be incorporated as an ecological corridor i.e. mountain to estuary.	This area falls within an extensive protected area which links mountain to ocean and therefore does not need to be indicated as a corridor.
11.14 Giorgio Lombardi MSc	Fig 4.6: the whole of Fernkloof and Vogelgat Nature Reserve are omitted as protected areas.	These areas have been added.
11.15 Giorgio Lombardi MSc	Plan 55: The Onrus lagoon is not depicted as a wetland nor an estuary. The urban edge is depicted encroaching into a CBA zone. These should be removed.	Development within an environmentally sensitive area is subject to legislative requirements such as NEMA, the Overstrand Overlay Zones etc. The inclusion in the urban edge does not automatically give development rights and if developed, impacts should be mitigated based on the said regulations. The urban edge will be retained as reflected on the plan. The plan has been updated with the WCBSP information. CBA's have been divided into Terrestrial (land) and CBA Aquatic (water). CBA (Aquatic) represents all water features including wetlands, estuaries, rivers, dams, etc that are protected. In this case the Onrus lagoon is an Estuary.
11.16 Giorgio Lombardi MSc	Plan 56: I do not understand that Fernkloof Nature Reserve as a protected area does not go right to the urban edge? Please also include the latest erven to be included into Fernkloof East as Protected areas of Prawn flats to Maanschynbaai. Vogelgat Nature Reserve has not been named on the plan as has Fernkloof Nature Reserve. It is imperative that the readers, developers realise that this area is a Stewardship contractual site. The Vogelgat River should be added as a water course.	Plans updated with the WCBSP *Fernkloof Nature Reserve boundaries updated *Vogelgat Nature reserve and watercourse was added.
11.17 Giorgio Lombardi MSc	Plan 58: The area highlighted as 423.5ha in the Hemel and Aarde valley is Urban Development RDA. Surely this should be a sensitive development zone as a major river systems traverses through it and has an ancient peat land and associated wetland?	The designation as an Urban Development Rural Development Area does not as of right provide landowners with development rights on the entire property. The development is subject to specific guidelines pertaining to the nature of development as per this MSDP as well as all statutory required approvals. This includes Environmental Authorisation which will typically exclude sensitive areas as stated by the objector from the developable area. Development of this area is therefore subject to a range of regulations which are purposed at effecting environmental friendly quality developments in keeping with its context.
12. Betty's Bay Rate Payers Association		
12.1 Betty's Bay Rate Payers Association	<p>A superficial reading is very positive of the status quo being maintained into the future (2050) and indicates nothing dramatic other than a proposed "New Urban Development" on a portion of land, 9,03 ha in extent, almost directly south-east of the present Mooluitsig. It may be that this area of land is envisaged as an extension of Mooluitsig, which one could not object to except that:</p> <ul style="list-style-type: none"> - That no need for such land and higher density was motivated in the report; 	<p>The Municipality is required to make provision for the extension of Mooluitsig. This area is proposed as an extension of the town in order to continue its function and effect spatial integration.</p> <p>Land is extremely limited throughout the Overstrand Municipal, therefore development should be encouraged where land is available in accordance with the density related detail outlined in the OGMS. This document is indeed referenced at the end of each spatial proposal under the theme of growth management.</p>

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	<ul style="list-style-type: none"> - That a large part of the said land may, from an environmental point e.g. fauna and flora and in particular potential wetlands, be unsuitable for higher density development; - That on p 70 of the report there are serious concerns regarding the adequacy of proper roads, sewerage, storm water and ESKOM which all militate against any proposed higher density development; - That although the water network provision is allegedly "adequately supplied" it is a known fact that it is not the case and the proof thereof can be found in the Municipality's planned water network upgrading but which upgrading had to be provisionally abandoned due to problems with the service provider and the contract having to be cancelled; - That the statement that "solid waste is sufficiently managed by means of waste drop-off facilities" is also incorrect as the drop off facility in Betty's Bay adjacent to the municipal library is apparently in the process of being closed down. 	<p>The portion of the proposed new development area which will ultimately be developed, will be determined based on statutory process requirements. These will identify constraints in terms of areas not developable due to biodiversity resources etc. Mitigation measures are likely to be imposed to reduce the biodiversity impact.</p> <p>All information regarding the status quo of services provision was provided by the Municipal Engineers. The information has since been updated by the said engineers. The majority of the items raised are of a high level of detail which is not addressed in this strategic MSDF in any field. The objector is advised to consult with the Overstrand Engineering Infrastructure Department regarding these items. In this regard, it should be noted that following approval of the MSDF, the engineering master plans will be revised to incorporate new spatial proposal areas.</p>
<p>12.2 Betty's Bay Rate Payers Association</p>	<p>As indicated above, it is deemed advisable that a proper environmental study of the portion of land be carried out prior to it being identified as a "higher density new urban development".</p> <p>A superficial evaluation indicates that a large portion of the identified land may be part of a wetland and also contain rare/endangered site-specific flora. It must be noted that the draft SDF itself in various places acknowledges the existence and importance of wetlands (p70) and the inclusion of natural and heritage features in both the draft EMOZ and HPOZ. Refer also to the promoting, restricting, maintaining and containing principles in par 5.4.2.1 on p 172.</p> <p>On p 174 it is suggested that "The unique sense of place should be maintained by implementation of the Draft HPOZ and EMOZ regulations" – a statement that is supported.</p> <p>Due to time constraints caused by the COVID-19 disaster it was not possible to do such an environmental analysis and it may be prudent to withhold any decisions until such time as this has been done. To this end a postponement would, in the light of the State of Disaster, be warranted and justified.</p>	<p>This is not the planning methodology to be followed as per the statutory policy and relevant legislative framework. Firstly Spatial Planning Policy (i.e. MSDF) earmarks development designations on a local level. This does not give rights or take rights away but depicts the spatial planning concept foreseen to be implemented by various role players. Although this area is earmarked for new urban development, development therefore remains subject to statutory process requirements which will highly likely include application for Environmental Authorisation based on the specialist studies required by the authorities (incl. studies such as freshwater assessments, botanical studies, etc.). The outcome of said studies/process may render portions of properties earmarked for development as not developable due to environmental and other constraints. The Overstrand Overlay Zones will also inform any land use application and decision making within relevant areas.</p> <p>The MSDF will be adopted as part of the Municipal IDP at this stage foreseen to take place in May 2020.</p>
<p>12.3 Betty's Bay Rate Payers Association</p>	<p>That the Municipality be informed of the above comments and an extension of time for more detailed comments and for an on-site environmental investigation of the site, be requested.</p>	<p>This request is denied firstly due to the fact that the statutory required 60 days commenting period was granted and in addition thereto and additional 30 days to accommodate the implications of COVID-19. The objectors therefore had a period of 90 days to conduct any investigation and prepare its comments and the MSDF adoption is due for submission to Council as part of the Municipal IDP process.</p>
<p>13-Overstrand Municipality: Environmental Penelope Aplon</p>		
<p>13.1 Overstrand Municipality: Environmental Penelope Aplon</p>	<p>Pg 9: word omitted after pristine under point 1, third box.</p>	<p>Noted.</p>

<p>13.2 Overstrand Municipality: Environmental Penelope Apton</p>	<p>Pg 13: Incorrect description of the CML process: DEA&DP managed the project for the development of coastal management lines. As part of this process, the coastal protection zone was identified. This zone was included as the draft Coastal Protection EMOZ.</p>	<p>Noted. Correct process referred to.</p>
<p>13.3 Overstrand Municipality: Environmental Penelope Apton</p>	<p>Pg. 18: Blue insert: Symbol for square meters not displayed correctly.</p>	<p>Noted. Corrected.</p>
<p>13.4 Overstrand Municipality: Environmental Penelope Apton</p>	<p>Pg 37: paragraph 1: As a result of its... Pg 37: Please include Fernkloof Nature reserve in the second paragraph. Pg 37: Symbol for cubic meters not displaying correctly in 6th paragraph.</p>	<p>The requested amendment has been made.</p>
<p>13.5 Overstrand Municipality: Environmental Penelope Apton</p>	<p>General comment on maps: The area covered by Fernkloof Nature reserve is incorrect. Please obtain the correct reserve boundary from Tairon Dry. Vogelgat Private Nature Reserve is not indicated on the maps. Please ensure the legend does not overlap with the map. Please ensure that the maps included are the same as the ones in the draft EMOZ document, there are slight differences. Kleinmond Coastal Nature Reserve not shown (Protected Area) or is it too small to see?</p>	<p>The correct delineation of Fernkloof was obtained and the plans amended. Vogelgat Nature reserve now indicated on plans Noted. revised Kleinmond Coastal Nature Reserve is now shown after the layers were updated with WCBSP.</p>
<p>13.6 Overstrand Municipality: Environmental Penelope Apton</p>	<p>Pg. 48: Please ensure that the EMPZ document is on the municipal website. Link does not navigate to document.</p>	<p>Noted.</p>
<p>13.7 Overstrand Municipality: Environmental Penelope Apton</p>	<p>Pg. 74: Solid waste drop-off for Kleinmond has been upgraded</p>	<p>Noted - Text amended</p>
<p>13.8 Overstrand Municipality: Environmental Penelope Apton</p>	<p>Pg. 78: Under Hawston, typing error for Paddavlei.</p>	<p>Noted - corrected.</p>
<p>13.9 Overstrand Municipality: Environmental Penelope Apton</p>	<p>Pg. 174: Section on Kleinmond Mention Bot-Kleinmond declared Ramsar wetland(2017)? In the Top 10 Most Important Estuaries in South Africa due to its size, habitat importance, zonal type rarity and biodiversity.</p>	<p>Noted - corrected</p>

13.10 Overstrand Municipality: Environmental Penelope Aplon	Pg. 176: Check spelling under Maintain heading: Overlay and Palmiet	Noted - corrected
13.11 Overstrand Municipality: Environmental Penelope Aplon	Pg. 182: Under promote heading: Bot-Kleinmond Lagoon is declared Ramsar Wetland (see https://isis.ramsar.org/isis/2291 and an Important Bird and Biodiversity area(IBA) is a draw card for tourism.	Noted - corrected
13.12 Overstrand Municipality: Environmental Penelope Aplon	Pg. 185: Insert on map: Mention Bot-Kleinmond declared Ramsar wetland(2017)? In the Top 10 Most Important Estuaries in South Africa due to its size, habitat importance, zonal type, rarity and biodiversity.	Noted. Plan amended
13.13 Overstrand Municipality: Environmental Penelope Aplon	Pg. 187 Map: Whole lagoon is Protected Area Ramsar	Noted. Plan amended
13.14 Overstrand Municipality: Environmental Penelope Aplon	Pg. 188: Under promote heading There is no Botrivier Nature Reserve it should be Rooisand Nature Reserve	Noted - name changed
13.15 Overstrand Municipality: Environmental	Pg. 190: Include Ramsar wetland under number (v)	Added.
14. Pat Redford		
14.1 Pat Redford	Page 12: Heading to read Western Cape Biodiversity Sector Plan 2017?	Heading and relative sections updated to reference and reflect the Western Cape Biodiversity Sector Plan and its information.
14.2 Pat Redford	The PLTF advocates integrated economic development, land use and transport planning, rather than hierarchy of plans that "lead" or "follow". Please explain what this means?	The integrated planning approach is one where the planning concept is informed by analyses of various aspects systematically. The outcome of the analyses is a series of informants based on which an integrated development/ spatial concept is compiled. The alternative and less effective manner of planning being referred to is where each planning informant is addressed in isolation in a separate informant layer not taking proper cognisance of the integrated situational context.
14.3 Pat Redford	Page 83: The statement that the development of two large scale retail centres did not seem to have had a detrimental	The objector is advised to visit a study contained in the Provincial

	<p>effect on either the CBD function in terms of economy, nor on its role of providing a quality urban environment is not a true reflection of the facts. The Whale Coast Mall has had a devastating impact on the CBD and many shops have closed down, well before the current Covid dilemma began.</p> <p>The reality is that the quality and caliber of shops is already deteriorating to the inevitable CHINESE JUNK shops. These businesses offer cash in advance for protracted periods, to desperate business property owners. The other shop owners are now surrounded by Chinese shops selling inferior goods. This is a trend throughout the coastal towns along the garden route. Visit Knysna, visit Plet, the central CBD's in these popular towns are awful, downgraded and struggling property owners are desperate. These are direct consequences of the establishment of large shopping malls featuring a blanket predictable mix of retailers, all the big guns. Destroyed many small and medium businesses.</p>	<p>Development Framework which highlights Hermanus as an excellent example where the establishment of large scale retail centres have not led to the degradation of the CBD (as perceived by the objector).</p> <p>The objector's frustration regarding the change in retail type and the stated impact is noted. The SDF is, however, not the vehicle to address this situation.</p>
<p>14.4 Pat Redford</p>	<p>Two ecological corridors have been identified and mapped during the exercise of delineating the draft Overstrand Overlay Zones. The first is a corridor that links the CBD to Hoyt's Koppie and the second a strong link between the mountainous areas and the coastline. The latter also integrates the said natural areas with the Fernkloof Nature Reserve to the east (refer Plan 30).</p> <p>With reference to the extract from the Draft MSDF, the commenting party is unclear as to where the two corridors are and challenges its existence.</p>	<p>The ecological corridors related to Hoyt's Koppie are clearly illustrated on the plan. The emotive statement that no such corridors exist is ill-informed and was identified during the extensive process of compiling the overlay zones. The first corridor is the link between Hoyt's Koppie and the CBD (via the soft open space surrounding the 'koppie' as well as the hard open space into the CBD). The objector seems unaware that biodiversity corridors do not only entail plant coverage, but also serves to provide sunlight, movement space for fauna incl. birds and fresh air. This is the function of the first mentioned corridor.</p> <p>The second is simply put a biodiversity link between Hoyt's Koppie and the extensive natural areas to the North/North West which eventually links to the coastline. This is clearly depicted on the plan.</p>
<p>14.5 Pat Redford</p>	<p>iii. "Foreign or unsympathetic styles of site layout and buildings should be discouraged in urban settlements and rural areas in order to strengthen the local sense of place and minimise visual impact."</p> <p>This statement suggests that there is an element of control or assessment by a qualified expert who can determine the meaning of 'unsympathetic.' Please indicate how this can be carried out and what line of command would/should follow through on this aspect?</p>	<p>The objective is to strengthen the local sense of place and although this is a challenge and an objective which will not be implementable in all areas, specific regulations like the Stanford HPOZ for example already stipulates building regulations proposed at preserving the historical town scale. It is acknowledged that such a level of control will have to be investigated in more detail for other areas which could inform the future MSDF's and Council Policies in terms of aspects such as uniform building styles etc.</p> <p>In terms of site layouts the Municipal Professional Land Use planners can ensure integrated urban morphology during land use application processes (i.e. similar layout patterns and building restrictions).</p>
<p>14.6 Pat Redford</p>	<p>vi. Where development is considered in an area / location regarded as visually sensitive, a visual impact assessment should be conducted to protect its significant sense of place characteristics'</p> <p>What line of command is responsible for 'protecting sense of place characteristics'? How is this considered by community representation?</p>	<p>The National Environmental Management Act application process of Environmental Authorisation will most likely be the first statutory process which can require a VIA.</p> <p>In parallel the Municipal Land Use Planners may request a VIA where it is deemed necessary as part of a Land Use Planning Application.</p> <p>Engagement is required in terms of both of the aforementioned environmental and land use planning legislation.</p>

<p>14.7 Pat Redford</p>	<p>'v. Manage the location and design of large scale retail facilities to enhance the viability and vibrancy of existing centres, as opposed to creating satellite retail centres that duplicate existing urban and rural centre functions to the detriment of the latter.'</p> <p>'vi. Encourage and facilitate urban regeneration and restoration of under-utilised or decayed existing centres. Refer Overstrand Growth Management Strategy</p> <p>Both the above points suggest a conflict with a previous comment regarding the large mall having had no impact on the CBD? How can this be a consideration, only once the horse has bolted?</p>	<p>In brief, these statements promote the expansion of existing urban areas but this should not be seen as blanket statements to be forced upon the free market, but as informative policy directives to be applied where it will be a sound contextual fit.</p> <p>Where there are sustainable opportunities for creating employment via additional larger commercial centres, this should definitely be investigated.</p> <p>It is again reiterated that the introduction of the large scale commercial centre in Hermanus is according to a specialist study in the Provincial Spatial Development Framework noted as a positive contribution to the town, without having a detrimental impact on the CBD.</p> <p>Where the introduction of this type of land uses at distance from a CBD is proposed, proper investigations must be undertaken to ensure that it will have the same positive effect on the CBD - this is the core objective of the policy statements.</p>
<p>14.8 Pat Redford</p>	<p>'4.3.6 Priority Areas for Biodiversity Conservation Strategy: All public owned land (including State property, Municipal and Provincial property) that is of high conservation importance is to be included in a formal municipal protection area network. The mechanisms being to establishing contract nature reserves negotiated in conjunction with the WCNCB conservation stewardship programme, providing legally bounding guidelines for land use. The objective of this strategy is to ensure that a broader formal conservation strategy is implemented for all public owned land within the Municipal area. Private land owners should also be encouraged to join the stewardship programme, in order to conserve land identified as being critical for biodiversity conservation in perpetuity. The draft Environmental Overlay Zone regulations, in the process of being promulgated, should be noted as a mechanism with similar objectives and once implemented, this strategy of the MSDF should be considered to be revised / integrated with the EMOZ regulation provisions.'</p> <p>How does the above statement impact on the current functioning and future protection of Fernkloof Nature Reserve?</p>	<p>Fernkloof Nature Reserve is already protected under NEMPA and will continue this level of protection. The other areas not currently under this type of protection will need to be brought in line with this where deemed necessary.</p>
<p>15 Kogelberg Biosphere Reserve Company (KBRC)</p>		
<p>15.1 Kogelberg Biosphere Reserve Company (KBRC)</p>	<p>OM has a high level of alien invasive trees over large areas, including land that the OM own such as reserves, parks and open space where all trees have not been controlled for years. The SDF should include a map indicating density and species in these areas and require that an alien invasive plant (AI) Eradication Plan must be compiled and funds made available in the IDP for the mapping, Eradication Plan and Eradication work.</p>	<p>This is not a function of a MSDF nor within the scope of the project of revising it. The commenting party is advised to contact the Municipal Environmental Department to assist in creating a solution to this problem.</p>
<p>15.2 Kogelberg Biosphere Reserve Company (KBRC)</p>	<p>Hanglip/Kleinmond does not have large areas of suitable land/space available. The SDF should investigate how an allocation of 20du/ha compares with high density housing in developed countries? Creative ways must be sought to provide and upgrade the housing while reducing the land surface required for housing.</p> <p>Note that the SPLUMA Principles of spatial sustainability under the point Environment, require that the SDF must indicate how sprawl will be curbed.</p>	<p>The OGMS is the vehicle for addressing densification within all of the Overstrand's settlements and is in the process of being updated. The OMSDF does not contain any detail regarding housing typologies. Details in this regard are also to be provided in the HSP which is in need of update. The principle of densification as a growth management mechanism is clearly applied within the Overstrand and specifically reference as a mechanism applied to "curb sprawl".</p>

<p>15.3 Kogelberg Biosphere Reserve Company (KBRC)</p>	<p>Overstrands' average Total economic growth in GVA is 2.9%. The average GVA of primary sector industries of agriculture, forestry and fishing are contracting (-1.1% and -1.7%, respectively) and tourism will contract substantially as result of the lockdown. With an average Total growth in GVA of 2.9% the economy has thus contracted in real terms. The Overstrand should take into account and must make people moving in the area aware of the fact that the economy has been contracting over time and that it will do so in future.</p>	<p>The comment is noted.</p>
<p>15.4 Kogelberg Biosphere Reserve Company (KBRC)</p>	<p>The SPLUMA Principles of spatial sustainability under the point, EFFICIENCY, requires that the SDF indicate how the use and innovation of green technology, alternative forms of energy and infrastructure will be optimised. In the absence of projects on the ground, policy changes that provide incentives to promote such projects should be called for. Policy encouraging individual residents and developers in the OMA to use Solar Panels as an example will stimulate the industry.</p>	<p>The commenting party is advised to refer to the OMSDF Policy section as well as action plan which contain numerous examples of where the SPLUMA principles informed the compilation of the MSDF as well as what actions could be taken to effect its directives.</p>
<p>15.5 Kogelberg Biosphere Reserve Company (KBRC)</p>	<p>OUR NATURAL ENVIRONMENT The commenting party lists a number of projects which could in its view address challenges related to aspects such as alien infestation, decreasing water sources and decrease in natural vegetation. In this regard, the following is highlighted:</p> <ul style="list-style-type: none"> • The SDF should mention that a map should be compiled indicating densities of alien infestation in the MSDF • Managing fire requires that it is done according to a proper Fire Management Plan (FMP) that takes account of season, fire temperatures, veld type, infrastructure, cooperation with neighbours, monitoring, ect. The absence of a FMP makes accountability and continual improvement impossible. 	<ul style="list-style-type: none"> • This will need to be taken up with the Municipal Environmental Section as a request outside of the scope of the MSDF. The Section has a plethora of GIS mapping data and may assist in compiling such a plan. • The Municipality is in the process of finalising its Fire Management Plan which will be approved in due course and should inform the next revision of the MSDF.
<p>15.6 Kogelberg Biosphere Reserve Company (KBRC)</p>	<p>URBAN NODES The density of future housing developments and the location thereof should be based on the actual environmental, special and economic constraints and realities.</p>	<p>It is the purpose of the Municipality to ensure that future development indeed takes place informed by environmental and other critical indicators. To effect this, the Municipality compiled environmental and heritage overlay zones being regulations purposed at managing and preserving its natural and heritage resources by means of focused statutory developmental related regulations. This mechanism will inform land use and environmental applications which will be required prior to development taking place. The processes will take into account numerous informants and may very well exclude areas for development based on biodiversity sensitivity. The land use and environmental processes will therefore take into account the actual environmental, heritage and other constraints and realities.</p>
<p>15.7 Kogelberg Biosphere Reserve Company (KBRC)</p>	<p>BETTY'S BAY The objector lists numerous reasons why the proposed new urban expansion area should be omitted. These, amongst other, include its biodiversity sensitivity, scenic route quality and its location outside of the urban edge.</p>	<p>The Municipality is required to make provision for the extension of Moolitsig. This area is proposed as an extension of the town in order to continue its function and effect spatial integration.</p>

<p>15.8 Kogelberg Biosphere Reserve Company (KBRC)</p>	<p>The SDF states that "the settlement is not adequately serviced by stormwater infrastructure" is agreed with. Such infrastructure however seems to drain wetlands and canalise the watercourses indicated on this map (an activity that is probably unlawful). The lack of an understanding of the surface water and wetland dynamics will cause unknown environmental damage during construction of infrastructure by the O.M.. All new development on roads, existing- or vacant erven will add to this problem and it is imperative that stormwater infrastructure should be guided by a study to understand the wetlands, infrastructure and stormwater dynamics.</p>	<p>Land is extremely limited throughout the Overstrand Municipal, therefore development should be encouraged where land is available in accordance with the density related detail outlined in the OGMS. This document is indeed referenced at the end of each spatial proposal under the theme of growth management.</p> <p>The portion of the proposed new development area which will ultimately be developed, will be determined based on statutory process requirements. These will identify constraints in terms of areas not developable due to biodiversity resources etc. Mitigation measures are likely to be imposed to reduce the biodiversity impact.</p>
<p>15.9 Kogelberg Biosphere Reserve Company (KBRC)</p>	<p>OUR FACILITIES The objector questions the proposed provisions for additional community facilities for Rooiels, Betty's Bay and Pringle Bay.</p>	<p>The comment is noted and the services infrastructure master plans will be updated following adoption of this MSDF. These plans are the vehicle to address all Municipal infrastructure planning and implementation and are required to be informed by environmental and other legislative requirements.</p>
<p>15.10 Kogelberg Biosphere Reserve Company (KBRC)</p>	<p>KLEINMOND The final recommendation after the assessment of the housing requirements in Kleinmond indicate that an additional area in extent of 65ha should be made available for higher density human settlement, Plan 49 below for Kleinmond does not seem to show any additional land proposed for residential development. If so, it is inconsistent with the final finding of the assessment (see above) especially since the report states that the "Kleinmond boasts of a substantial housing project currently underway"</p>	<p>It is noted and the objector is correct that the proposed provision of facilities needs to be refined. As stated earlier in this report, a detailed community facility analysis will have to be undertaken by the Municipality with the outcome reflected in detail in both the revised OGMS and HSP. The community facility figures provided in the MSDF is based on the CSIR requirements as a first level of detail informant to be refined as stated.</p>
		<p>It should be explained that a status quo analysis identifies opportunities and issues which in some instance can/cannot be addressed. The amount of land that will be required based on the population growth statistics is simply not available in Kleinmond and alternative mechanisms will have to be identified to accommodate the population growth. The MSDF identifies this challenge and it will have to be further investigated and resolved during the revision of the OGMS and HSP. This can be done by means of densification (new housing project as example) or locating additional population at alternative settlements (refer Fisherhaven-Hawston Growth Node).</p>