

PORTION 79 OF FARM RUYGTE
VALLEY NO. 205 SEDGEFIELD

REZONING, CONSENT USE, AND SDP APPROVAL APPLICATIONS



Planning  Space
Town and Regional Planners

2/4/2026

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1. Introduction

Planning Space has been appointed by **Daniel Francois Sevenster**, the owner of Portion 79 of Farm Ruygte Valley No 205, to prepare and submit the following application in terms of Section 15 (2) and Chapter IV of the Knysna Municipality: Standard Municipal Land Use Planning By-Law, to the Knysna Municipality (See Power of Attorney attached as **Annexure A**).

- (i) **Rezoning in terms of Section 15 (2) (a)** of the Knysna Zoning Scheme By-Law from “Agriculture I” to “Open Space III”.
- (ii) **Consent in terms of Section 15 (2) (o)** of the Knysna Zoning Scheme By-Law to permit **3 tourist accommodation** units of 65m² each.
- (iii) **A permission required in terms of the zoning scheme in terms of Section 15 (2) (g)** of the Knysna Zoning Scheme By-Law for the approval of a Site Development Plan and an Environmental Management Plan.

The proposed development triggers listed activities in terms of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. Eco Route Environmental Consultants have been appointed to submitted to necessary application to the competent authority, which is the National Department of Forestry, Fisheries and the Environment (DFFE). The application was submitted to the Department, and the Basic Assessment Report (BAR) is attached hereto as Annexure L.

2. Property Information

2.1 LOCALITY

The property is in the Groenvlei area in the Knysna Municipal Area to the east of Sedgefield. (See Diagram 1: Locality Plan). The property can be accessed from a Public Servitude Road that runs along the northern boundary of the property (described as Bushy Way on the SG Diagram 6532/61), which connects to the N2 via the Groenvlei Divisional Road (DR 1594).



Figure 1: Extract indicating the locality of the subject property.

2.2 PROPERTY DESCRIPTION

Title Deed Description	Portion 79 of Farm Ruygte Valley No. 205 in the Municipality Division of Knysna, Western Cape
21 Digit code	C03900000000020500079
Title Deed Number	T000047871/2023
S.G. Diagram Nr	SG 6532/1961
Title Deed Restrictions	There are several restrictive conditions registered against the property, which will require the Consent from Lake Pleasant.
Servitudes	The property is entitled to a Public Right of Way servitude as described in Condition H of the Title Deed. The NOTARIAL DEED 20/52 dd 5-9-1951 is attached as Annexure F.
Property Size	5.1576 ha
Property Owner	Daniel Francois Sevenster

Bonds	Yes, Bond Holder's Consent must be obtained
Zoning	Agriculture Zone I in terms of the Knysna Zoning Scheme By-Law
Land Use	Vacant

2.3 BACKGROUND

The property forms part of a small holding area that was created when Portion 70 of Farm Ruygte Valley was subdivided in 1961. The original farm portion was known as Portion 38, called Lake Pleasant Estate. The property is undeveloped.

The Lake Pleasant Estate Pty Ltd was the original owner of Portion 70, and when the subdivision was approved, this company laid down several conditions that have been taken up in the Title Deeds of the subdivided properties. It will be necessary to obtain the consent from **The Lake Pleasant Estate Pty Ltd**, especially in terms of Conditions I (d) and (e). **A company search revealed that the company still exists.**

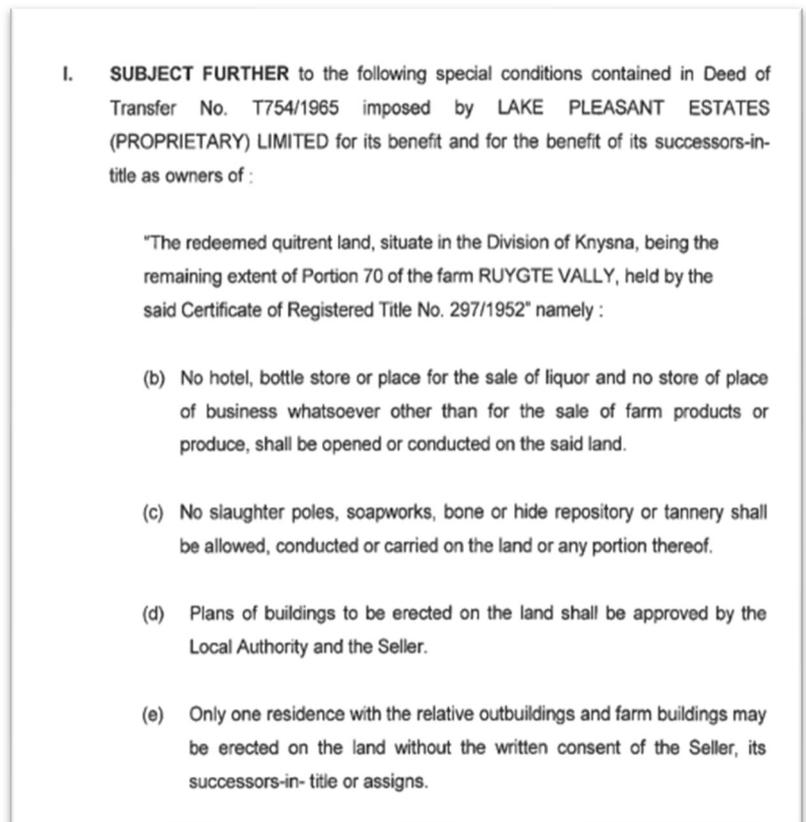


Figure 2: Extract from Title Deed (T47871/2023).

3. Proposal

3.1 DEVELOPMENT CONCEPT

The owners of the land would like to reside on their property and would therefore want to construct a small dwelling house of $\pm 200\text{m}^2$ on the site. The construction of a dwelling house is a primary right. It is also their wish to construct three small self-catering tourist accommodation units measuring about 65m^2 each. These would be mainly used for private guests and family. The idea is to allow the owners to share the property with

friends and family without compromising on privacy. The total floor area of the residential buildings will be calculated to be less than 400m², which is inline with house sizes of upmarket coastal properties.

Ancillary buildings include Staff housing of ±50m² and as well as a shed of 80m² to store farm implements required for the maintenance of the land. A gravel access road of less than 3m wide is planned along the eastern boundary that will culminate in a parking area. From there, the house and units will be accessed via a boardwalk.

The house and units will be clustered together on the southern side of the property on the high-lying area above the cliff, to maximise views over the ocean.

Although the property is zoned for “Agriculture I” purposes, it is not the intention of the owners to use the land for Agricultural purposes. The value of the property lies in its natural beauty and sweeping coastal views, and the intention is to protect the rest of the property for conservation purposes.

The development concept is to create a quiet private hideaway within a natural environment. The architecture will be light and environmentally sensitive. Building materials will be lightweight steel and timber, plus glass and natural stone, as opposed to brick and concrete.

The building footprint will measure 525m² in total, and the planned access road will be about 220m long and 3m wide, ending in a parking area (4 x bays) that calculates to about 765m². The units will be accessed via a boardwalk. The total development area (including boardwalks) will amount to about 1375m², which accounts for less than 2.7% of the site, leaving 97.3% of the site in a natural state.

3.2 REZONING

The property is currently zoned “Agricultural I” in terms of the Knysna Zoning Scheme By-Law applicable to the area. This zoning permits agricultural activities as well as a dwelling house (of unlimited size) as a primary right.

To facilitate the protection of the natural landscape as recommended in the Terrestrial Biodiversity Specialist Assessment (refer to Annexure H), it is proposed that the entire property be rezoned “Open Space III” (Nature conservation area). The objective of this zone is to provide for the conservation of natural resources in areas that have not been proclaimed as nature areas (non-statutory conservation), in order to sustain flora and fauna and protect areas of undeveloped landscape, including woodlands, ridges, wetlands, and the coastline.

According to the Terrestrial Biodiversity Specialist Assessment, the site is within CBA1 and CBA2 areas, which are ideal areas to include in future conservation areas due to its already being identified as a high-value biodiversity area. The site is also within the buffer of the Wilderness National Lake Area and the Lake Pleasant Private Nature Reserve, and also includes areas highlighted for future protection in the National Protected Area Expansion Strategy (NPAES). The planned rezoning out of Agriculture to Open Space III would be in line with these conservation efforts.

Development parameters:

The following development parameters apply to the Open Space III zone:

- (a) The Municipality may require an Environmental Management Plan to be submitted for its approval.
- (b) The Municipality must determine the land use restrictions and the development parameters for the property based on the objectives of this zoning, the particular circumstances of the property, and, where applicable, in accordance with an approved Environmental Management Plan.
- (c) **One dwelling house is allowed** if no dwelling house exists on another portion of the land unit zoned for agricultural purposes or if the full extent of the land unit is zoned Open Space III.
- (d) When a consent use to provide tourist facilities **or tourist accommodation** in a “nature conservation area” is approved, it is subject to conditions imposed by the Municipality with regard to layout, landscaping, and building design.
- (e) A Site Development Plan must be submitted to the Municipality for its approval, clearly indicating the position of all structures, services, and internal roads.

The proposal complies with the above-mentioned development parameters.

3.3 PROPOSED CONSENT USE

A range of consent uses is provided to supplement and support the main objective of this conservation zone. “Tourist Accommodation” is one of the consent uses that are permitted within the “Open Space III” zone.

The three proposed chalets can be accommodated as a consent use and comply with the land use description of “Tourist Accommodation”.

“Tourist accommodation” is described in the Zoning Scheme By-Law as a harmoniously designed and built holiday development, used for holiday or recreational purposes, whether in private or public ownership, that:

- (a) consists of a single enterprise that provides overnight accommodation by means of short-term rental or time sharing only;
- (b) may include the provision of a camping site, caravan park, chalets or mobile home park, resort shop, private or public roads; and
- (c) does not include a hotel, guest lodge, or wellness centre.

3.4 SITE DEVELOPMENT PLAN APPROVAL

A Site Development Plan must be submitted to the Municipality for its approval, clearly indicating the position of all structures, services, and internal roads. Site Development Plan No. PTN79-205rev 2 is attached and indicating siting of buildings, roads, setback lines and sensitive areas. A final SDP will be submitted once the Environmental Authorisation has been granted.

3.5 ACCESS

The property can be accessed from a Public Servitude Road that runs along the northern boundary of the property (described as Bushy Way on the SG Diagram 6532/61), which connects to the N2 via the Groenvlei Divisional Road (DR 1594). Although earlier aerial imagery indicates that this road has been cleared in the past. It is completely overgrown and is presently only accessible by motor vehicle up to the access to neighbour's property (Portion 78).

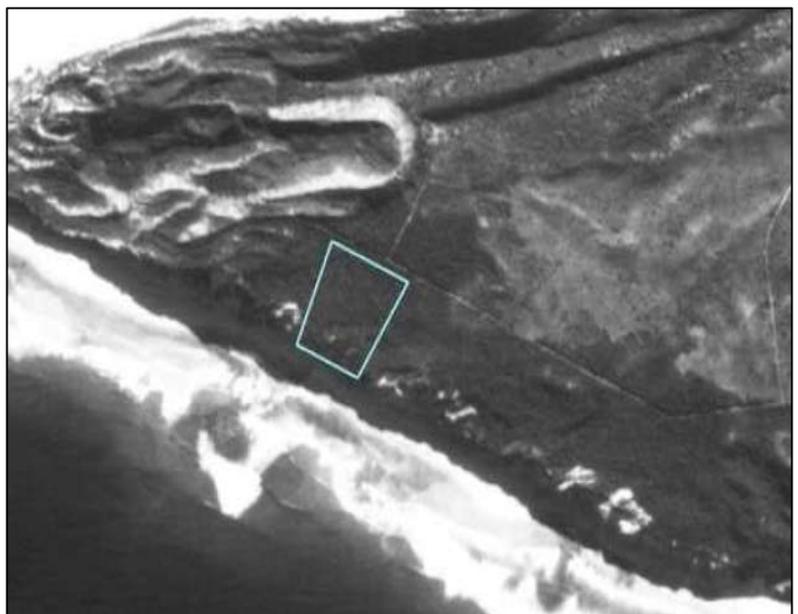


Figure 3: Aerial Photo (1973).

The original pathway/roadway is clearly visible in the 1973 aerial photograph. The NOTARIAL DEED 20/52 dd 5-9-1951, as referenced in the Title Deed of the property, is attached hereto as Annexure F.

The owner of Portion 79 has recently obtained an OSCAE Permit that allows them to clear this overgrown road up to their property (attached as Annexure G).

3.6 ENGINEERING SERVICES

3.6.1 WATER

The property is not connected to any municipal infrastructure, and there is no water reticulation network in the area. The units, as well as the main house, will be equipped with rainwater tanks.

3.6.2 SEWER RETICULATION

The house and unit will be equipped with a Conservancy tank.

3.6.3 ELECTRICITY

The main house and units will be off the grid and will rely on solar electricity and gas.

3.6.4 SOLID WASTE REMOVAL

There is no municipal waste removal in the area, and the owners will need to take their waste to the nearest municipal pickup point, which needs to be determined.

4. Need & Desirability

In terms of the Promotion of Administrative Justice Act, 2000 (Act No. 3 of 2000) (“PAJA”), all administrative action must be based on the “relevant considerations”. NEMA and the EIA Regulations highlight specific considerations, which include specifically having to consider “**the need for and desirability of the activity**”.

4.1 NEED

The need for the proposed rezoning and consent use arises from the intrinsic environmental sensitivity and conservation value of the property, together with the absence of any realistic or sustainable agricultural use. Although zoned “Agriculture I”, the land is vacant, environmentally constrained, and unsuitable for meaningful farming due to its coastal setting, dune systems, steep slopes, and high biodiversity value. The existing zoning, therefore, does not reflect the land’s actual capability or optimal long-term use.

Rezoning the property to “Open Space III” (Nature Conservation) is required to secure the long-term protection and responsible management of this ecologically valuable site. This zoning provides a formal and enforceable conservation framework and, importantly, requires the approval of both a Site Development Plan and an Environmental Management Plan. These instruments will strictly regulate the extent, location, and form of development and ensure that the remainder of the property is retained in a natural or rehabilitated state, thereby preventing incremental or inappropriate future development.

There is also a legitimate need for the owners to occupy and enjoy their property in a manner compatible with its natural character. The proposal allows for a single dwelling house and three small accommodation units, primarily intended for use by family and friends. While defined as “tourist accommodation” in zoning terms, these units do not constitute an intensive or commercial tourism enterprise, but rather provide a controlled means of limited occupation without dispersing development across the site.

The placement of the buildings has been informed by environmental, geotechnical, and visual considerations and reflects a deliberate effort to cluster development within a single, carefully selected footprint. Given the substantial concession inherent in rezoning the entire property to a conservation zoning, it is reasonable that the limited development footprint be located where the owners can meaningfully enjoy the property, rather than being constrained to a peripheral or compromised area.

Ongoing conservation entails significant management responsibilities, including alien invasive control, rehabilitation, and erosion management. The Environmental Management Plan will provide a binding framework to guide these long-term efforts, with the limited accommodation component providing a practical means of supporting sustained stewardship of the land.

The proposal, therefore, responds to a clear need to transition the property from an inappropriate agricultural zoning to a conservation-based land use that protects ecological integrity while allowing reasonable, low-impact enjoyment by the owners.

4.2 DESIRABILITY OF THE SITE TO ACCOMMODATE THIS DEVELOPMENT

Desirability factors relate to place. Is the land physically suitable to accommodate the proposed development? Does the proposed development fit in with the surrounding land uses? Is the proposal compatible with credible spatial plans? Is there perhaps a better land-use alternative for the land parcel?

4.2.1 PHYSICAL SITE CONSTRAINTS AND OPPORTUNITIES

4.2.1.1 Topography

The property has an even gradient sloping to the east with an average elevation of about 70m above MSL. The southern portion of the site slopes steeply to the south to form a steep coastal cliff. Development on steep slopes is generally discouraged due to environmental sensitivity, erosion risk, and visual impact.

A detailed Contour Plan of the southern section was prepared by Eden Geomatics and is attached as Diagram 6. The plan indicates a wide dune crest to the north of the coastal cliff. The proposed buildings are planned on the upper dune terrace. In terms of slope, the gradient of the planned development appears to be suitable.



Figure 4: 5m Aerial Contours from Cape Farm Mapper.

4.2.1.2 Soil Stability



Figure 5: 3D KML projection.

A Preliminary Geotechnical and Geomatic Investigation was undertaken by Rock Hounds (Pty) Ltd to assess dune stability, soil conditions, and the suitability of the site for development. The investigation confirms that the property is underlain by a fossilised coastal dune system comprising deep, young sandy soils with limited pedological development. The soils are characterised by organic-rich top layers overlying silty loam, sandy loam, and sand at depth, with very low clay content and high permeability. These soil conditions are typical of coastal dune environments and are inherently soft and highly erodible.

Dynamic Cone Penetrometer (DCP) testing recorded low blow counts across the test locations, confirming that the soils are loosely compacted and have low natural bearing capacity. This condition does not indicate instability but rather necessitates the use of appropriate foundation systems designed for soft sandy soils. The investigation further distinguishes between the steep coastal dune face and cliff areas to the south of the site, which are subject to cyclic marine erosion and are considered high-risk and the more stable, gently sloping upper dune terrace inland, where vegetation is well established, and dune morphology has remained stable over time.

The proposed building footprint has been deliberately located on this upper dune terrace, outside areas of steep slope, beyond identified structurally weak zones (D7 on the Constraints map), and landward of both the

projected 100-year coastal flooding extent and the measured long-term inland movement of the coastal dune system. The siting therefore avoids areas most susceptible to erosion, slope instability, and coastal processes.

The design of the development responds directly to the identified soil and stability constraints. Residential buildings are clustered within a development node to limit disturbance, cut-and-fill will be minimised, and lightweight construction methods will be employed. Foundations will be specifically engineered to accommodate soft, erodible soils, and stormwater will be managed to prevent concentration of runoff and erosion. Disturbed areas will be rehabilitated with indigenous vegetation in accordance with the Environmental Management Plan. With these measures in place, the investigations conclude that the proposed development can be safely accommodated without compromising dune stability or the long-term environmental integrity of the site.

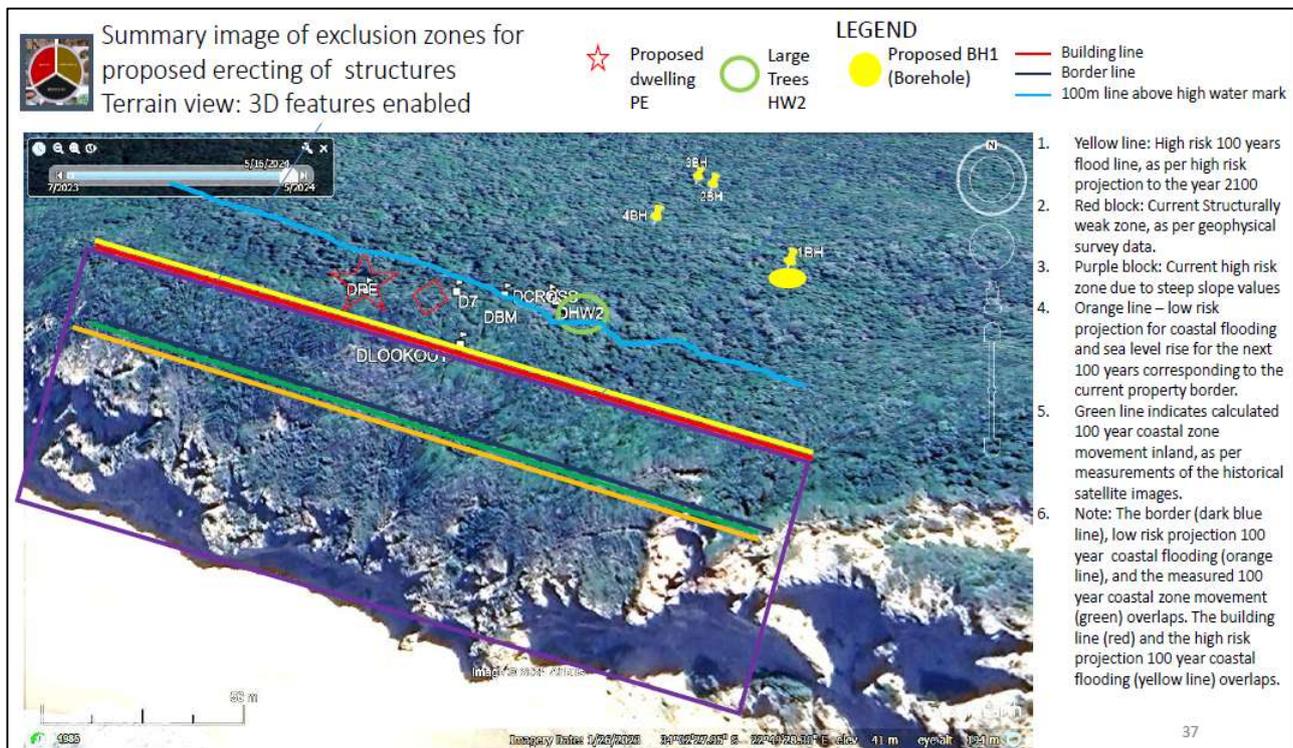


Figure 6: Proposed Setback line from Geotechnical Investigation (see Constraints Map attached as Diagram 8)

4.2.1.3 Terrestrial Biodiversity

Although the site is mapped within one regional vegetation type, Goukamma Dune Thicket, which is not a listed endangered ecosystem, the entire site is in a natural state, with the majority of the site identified as an indigenous natural forest. All parts of the site, therefore, have a very high sensitivity with respect to the Terrestrial Biodiversity.

According to CapeNature Western Cape Biodiversity Spatial Plan and Guidelines, the northern portion of the site is identified as a Critical Biodiversity area, while the southern section is identified as a degraded Critical Biodiversity Area. The buildings are proposed in the degraded southern section of the site. The requirement for CBA2 areas is that the site should be maintained in a natural or near-natural state, with no further loss of habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.

A qualified Botanist, Dr David Hoare, was appointed to conduct a Plants, Animals & Terrestrial Biodiversity Assessment to determine whether the vegetation of the listed ecosystem occurs on-site or not. The Study is attached as Annexure H. The placement of the units aligns with the findings of the Terrestrial Biodiversity Assessment. The study confirmed that the area where the development footprint is planned is heavily invaded by Rooikrans (*Acacia cyclops*) and is therefore somewhat degraded from a biodiversity perspective, confirming the CBA 2 status. This footprint is also preferable in the sense that it has a smaller footprint area within the forest, which is the most sensitive vegetation on the site.



Figure 7: Vegetation on site.

The total disturbance footprint is limited to approximately **1 375 m² (less than 2.7 % of the property)**, ensuring that **97.3% of the site remains natural or near-natural**. Mitigation includes alien invasive clearing, rehabilitation with locally indigenous vegetation, and implementation of an Alien Invasive Species Management Plan.

4.2.2 COMPATIBILITY WITH PLANNING POLICY

Another test of the desirability of a project is by considering the broader communities' needs and interests as reflected in credible Spatial Development Frameworks on Local, Municipal, District, Regional, Provincial, and National levels.

4.2.2.1 Western Cape Provincial Spatial Development Framework 2014

The Western Cape Provincial Spatial Development Framework (PSDF), approved in 2014, establishes a clear spatial agenda that prioritises the protection of natural assets, biodiversity, coastal systems, and scenic landscapes, while discouraging inappropriate development on environmentally sensitive or marginal rural land. The proposal on Portion 79 of Farm Ruygte Valley aligns strongly with these objectives.

The PSDF recognises that not all land zoned for agriculture is suitable for productive farming and cautions against forcing agricultural use on environmentally constrained sites, as this may result in degradation rather than sustainable economic benefit. In this instance, the property's coastal location, dune systems, biodiversity sensitivity, and limited land capability render agricultural use neither viable nor appropriate. The proposed rezoning from "Agriculture I" to "Open Space III" therefore reflects a more suitable and defensible land use response, consistent with the PSDF's emphasis on the sustainable use of provincial assets.

The PSDF further promotes conservation-led land uses and low-impact rural activities in sensitive areas, supported by risk-averse planning and specialist investigations. This proposal is supported by detailed environmental, geotechnical, geomatic, and visual assessments, which have informed the siting, scale, and design of development. The clustering of buildings within a very limited footprint and the retention of more than 97% of the site in a natural or rehabilitated state directly support the PSDF's objectives for biodiversity protection, coastal resilience, and landscape preservation.

4.2.2.2 Knysna Spatial Development Framework 2025

In December 2025, the Council adopted an amended Spatial Development Framework (2024/2025). As was the case with the previous SDF 2020, the property is situated to the east of the Urban edge of Sedgfield and is earmarked for a conservation buffer area.

The proposal to rezone this property from "Agriculture Zone I" to "Open Space III" (Nature Conservation) aligns with the spatial vision of the Knysna SDF (2025).

The proposed rezoning from Agriculture Zone I to Open Space III with consent use for three small tourist accommodation chalets is compatible with the spatial intent and policy directives of the Knysna Municipal Spatial Development Framework (MSDF). The MSDF's Spatial Planning Categories explicitly recognise that land containing sensitive biodiversity and conservation corridors may appropriately accommodate conservation-aligned tourism activities. In this regard, the MSDF states that *"landowners should be encouraged to give their land in this category conservation status, which may include tourism activities to provide income to manage the land"* (MSDF 2025, p. 16). This policy establishes a clear planning basis for low-impact, nature-based tourism as a compatible land use within environmentally sensitive areas, provided such activities support conservation management objectives rather than undermine them.

Furthermore, the proposal aligns with the MSDF's Environmental Framework and Rural Development Framework, which collectively promote the protection of Critical Biodiversity Areas (CBAs) while allowing sustainable, site-specific economic activities that do not compromise ecological integrity. The proposed development is limited to a very small footprint within previously disturbed areas, retains the vast majority of the property in a natural or rehabilitated state, and is supported by an approved environmental assessment demonstrating that ecological functioning will be maintained. As such, the rezoning to Open Space III with a controlled consent use for low-impact tourist chalets is consistent with the MSDF's spatial vision of balancing biodiversity protection with sustainable rural economic development.

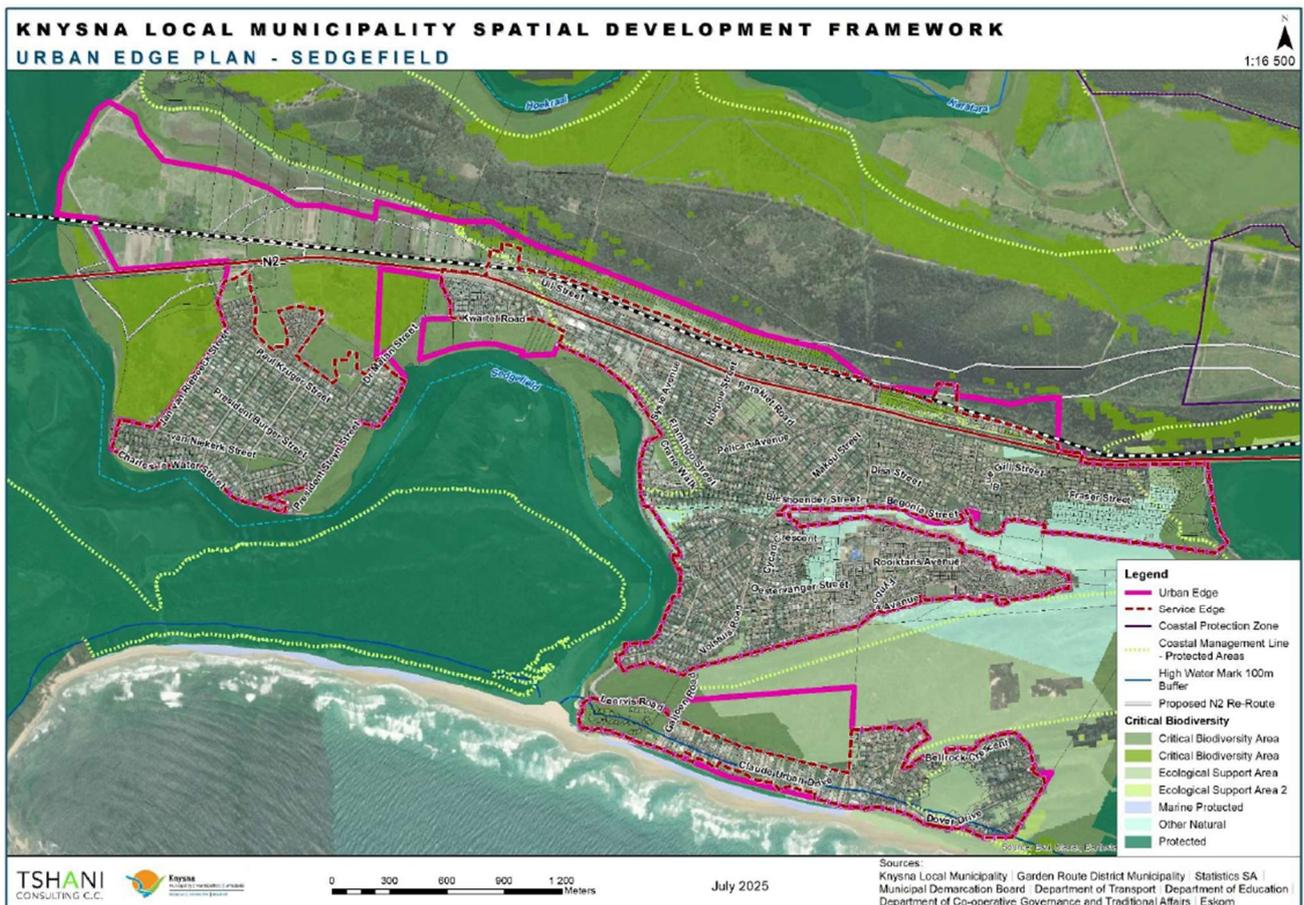


Figure 8: Extract from the SDF.

4.2.2.3 Rural Areas Guidelines 2019

The Rural Areas Guidelines for the Western Cape were published in 2019 by the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP). It provides a framework for sustainable rural development, guiding land use planning while balancing conservation, agriculture, and rural livelihoods.

The Rural Areas Guideline permits and even encourages tourism accommodation within the rural areas and nature reserves, to offer more people access to unique tourism and recreational resources in sought-after natural areas, where it would not otherwise have been possible.

The document provides specific guidance regarding tourist accommodation in degraded Critical Biodiversity Areas (CBA 2). In summary, SPC Core 2 comprises areas in a degraded condition that are required to meet biodiversity targets for species, ecosystems, or ecological processes. These areas should be rehabilitated, and only low-impact, biodiversity-sensitive land uses are appropriate.

Non-consumptive low-impact eco-tourism activities such as recreation and tourism (e.g. hiking trails, bird and game watching, and **visitor overnight accommodation are permitted**). Linear infrastructure installations, such as roads, are also permitted. Intensive land uses, including mining, large-scale agriculture, and urban or industrial development, are, however, not supported. The proposal aligns with the envisaged land uses for the area.

Preferably, existing disturbed footprints should be used for new development. In this case, there are no disturbed footprints, but the area where the most alien invasion occurs has been chosen as the site with the lowest impact on biodiversity. The units are also not dispersed throughout the site but clustered together to minimise ecological disturbance.

The guidelines require that environmentally sensitive and sustainable construction principles be applied to ensure that development is in harmony with the character of the surrounding landscape and to ensure the maintenance of its natural qualities. The guidelines do not propose a specification of scale or density of tourist accommodation but advise that the aesthetic qualities of the receiving environment must be the factor determining the appropriate scale and form of the proposed development. Two visual Impact Statements were conducted to ensure that the proposal will not have any visual impact and that the mitigation measures described in this report will be adhered to.

In this instance, the architecture will have a light footprint with lightweight steel frames, wood, and glass rather than bricks and mortar. The design ethos will be to completely blend in with nature.

The document also states that land development proposals must avoid negative impacts on coastal resources and be responsive towards coastal risk zones. Due consideration must be given to any coastal management/setback line and zone risks. The property, situated on the coast, is potentially affected by the Coastal Management Line.

Although the buildings are within 100m of the high water mark of the sea, the buildings have been placed outside the 20-year, 50-year, and 100-year erosion risk lines as depicted on the DEA&DP Coastal Management Map.

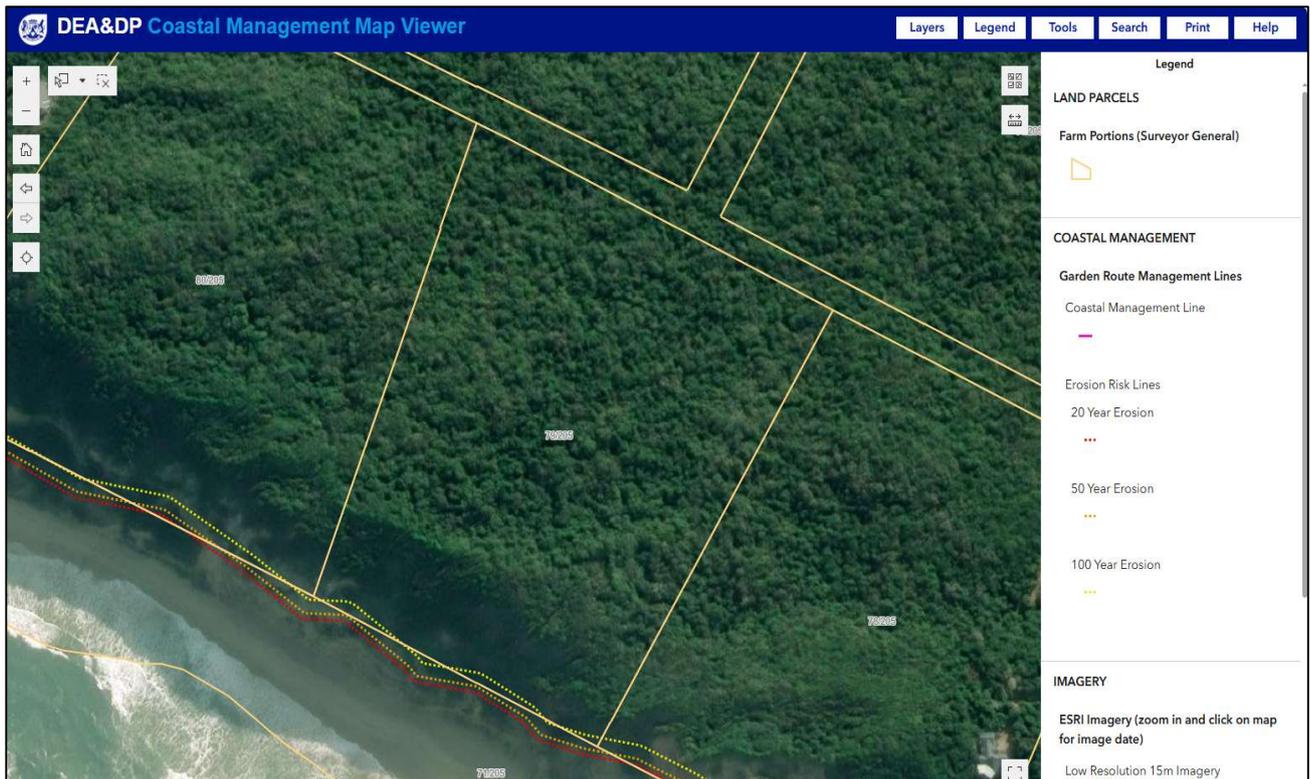


Figure 9: Extract from DEADP Coastal Management Lines.

In this regard, a Geomatic and Geotechnical investigation was done to understand the dune stability and the coastal morphology over time. The study resulted in a technically determined and site-specific development setback line to protect the coastal area and the planned investment. The line is approximately 30m from the boundary of the property. The planned footprints of the building are inland of this line.

4.2.2.4 Spluma Development Principles

In considering the application, the decision-maker needs to be guided by the DEVELOPMENT PRINCIPLES contained in (Chapter II) of the Spatial Planning and Land Use Management Act 2013 (Act no 16 of 2013) SPLUMA and Chapter VI of the Land Use Planning Act, 2014 (Act 3 of 2014) (LUPA).

Section 7 of the Act describes a set of development principles that need to be considered when evaluating any development application. These principles include the following:

SPATIAL JUSTICE

Spatial justice principles seek to eliminate spatial injustices that result from discrimination and marginalisation. Inequitable access to housing, educational and economic opportunities, and health facilities is a consequence of spatial injustice. The instruments used to promote spatial justice are varied and include Spatial Development

Frameworks, Precinct Plans, Urban Regeneration Plans and Policies. The principle of spatial justice requires that past spatial and other development imbalances must be redressed through improved access to and use of land, and this is mainly done through government intervention.

SPATIAL SUSTAINABILITY

The rezoning promotes spatial sustainability by shifting from a zoning category (Agriculture) that is unsuitable for this land to one that protects biodiversity while allowing a sustainable income stream for conservation. The proposed eco-tourism model is a low-impact, resource-sensitive land use that supports the long-term ecological health of the property, reducing the risk of neglect and degradation over time. Furthermore, rezoning to “Open Space III” acts as a protective measure against future development pressures, ensuring that the land remains intact as a natural buffer rather than becoming vulnerable to future urban expansion as Sedgefield grows.

SPATIAL EFFICIENCY

The proposal makes efficient use of land and resources by ensuring that only a small portion of the 5-ha property is developed, leaving the majority of the land in its natural state. The proposed small-scale chalets ($\pm 65\text{m}^2$ each) and a single dwelling are designed to be minimally intrusive, following principles of green building, low-density development, and careful site placement.

SPATIAL RESILIENCE AND GOOD ADMINISTRATION

This approach integrates thoughtful design and planning with awareness of environmental risks and climate change. The placement of buildings was guided by a comprehensive geotechnical investigation, which considered not only the current geological conditions but also long-term projections, including sea level rise and climate-related impacts. By proactively incorporating these factors, the development enhances its long-term resilience, ensuring sustainability and adaptability in the face of environmental changes.

4.2.3 POTENTIAL IMPACTS ON THE SURROUNDING ENVIRONMENT

4.2.3.1 Coastal erosion and slope instability

The proposed development site is situated on elevated terrain at approximately 80 metres above mean sea level, as confirmed in the Preliminary Geotechnical and Geomatic Report and reflected in the site contours presented in the Constraints Map. While the development footprint falls within the broader 100 m High-Water Mark (HWM) inland zone, it is important to note that the HWM line depicted on available mapping products is not a gazetted or legislatively approved development setback line, but rather an indicative planning tool

used to identify areas that may be subject to coastal processes, including wave run-up, storm surge, and sea-level-rise influences.

In terms of the Integrated Coastal Management Act (ICMA) and associated coastal planning practice, development is not prohibited within the 100 m HWM zone, provided that site-specific risk has been assessed and appropriate mitigation measures are implemented. The purpose of the HWM is therefore to signal potential coastal sensitivity and guide informed, risk-averse decision-making, rather than to function as an absolute exclusion zone.

Specialist investigations undertaken for this project, including the geotechnical, geomatic, and coastal risk assessments, confirm that the preferred development footprint is located well above projected coastal flood levels, outside mapped high-risk erosion and flood-prone areas, and landward of site-specific erosion risk thresholds. The constraints-led layout, elevated site position, and limited development footprint collectively ensure that the proposal will not compromise coastal processes or long-term shoreline stability.

4.2.3.2. Visual impact

The introduction of buildings within a highly scenic coastal landscape presents a risk of **visual intrusion and alteration of the natural character** of the area. The proposed development will, however, have a low visual sensitivity according to the Visual Impact statements prepared by both Paul Buchholz and Outline Landscape Architects (attached as Annexures J1 and J2). From the site visit conducted by both specialists, it was established that the site is not visible from the scenic routes such as the N2 and Groenvlei Road or any tourist attractions and developments such as Lake Pleasant Resort and Cola Beach due to the topography and dense vegetation.

Although the main house and the 3 chalets are positioned in a relatively high-lying area within the site, the proposed development will have a low exposure due to the screening effect of the surrounding vegetation and topography. The development will also not be visible to viewers on the beach due to the highly elevated and steep cliffs. The beach is approximately 70m below the proposed development. The cliffs are highly eroded and form overhangs. Views from the beach upwards towards the proposed development are limited due to these cliff overhangs, and a direct visual impact is not anticipated.

The BAR concluded that the potential visual impacts, while inherently minimal due to the project's environmentally sensitive approach, can be effectively mitigated through careful placement among the existing trees and green design that will ensure that the structures blend in with the natural surroundings. The architecture will include natural elements of wood, stone, and glass, and will be supported by a light steel structure that will avoid the need to cut and fill, which could potentially scar the landscape and lead to erosion.



Figure 10: Proposed Architecture

4.2.3.3 Impact on the Character of the area

The property is situated in the Groenvlei Rural area. The properties in the area are all about 5ha in size and have an “Agriculture Zone I” or “Open Space IV” zoning (See Diagram 3: Zoning Map attached). None of the properties is actively used for agricultural production, and most of the properties are in a natural state with no buildings on them. It can be assumed that over time, most of the properties will be developed with at least one dwelling each, which is within the primary right of the landowners. Some of the properties, as can be seen from Figure 11 below, form part of the Lake Pleasant Private Nature Reserve Section No.2.



Figure 11: Protected areas indicated as Green.

The nearest residence is approximately 250m to the east. The resident is a neighbour who has similar interests and circumstances. Cola Beach, a suburb in Sedgefield, is 700m to the west. Due to the undulating topography and dense vegetation, and the proposed design of the development, the development is not expected to have a visual impact on residents of Cola Beach or the neighbouring property. The open Space III zoning will fit in with the land use of the formally protected areas in the area. The small scale of the planned chalets is such that it will not have a notable impact on the surrounding properties or road network.

4.2.3.4. Impact on services, infrastructure, and public resources

Conventional development could place pressure on municipal services and infrastructure, particularly in a rural area outside the urban edge. All services will be off-grid, including solar power, rainwater harvesting, conservancy tanks, and off-site waste disposal. This eliminates reliance on bulk municipal infrastructure and ensures that the development does not create additional service demand. Any access improvements will be privately funded.

4.2.3.3 Traffic Impact

Traffic impacts were assessed as part of the Basic Assessment process and found to be minor due to the very low-intensity nature of the development. The development scale is far below thresholds typically requiring a formal TIA, and the anticipated vehicle trips are comparable to a single residential dwelling. There is no intensification of access points onto higher-order roads, and no reliance on municipal or provincial road upgrades to accommodate the development.

5. Summary

The proposed development on Portion 79/205 consists of a 200m² dwelling house and three self-catering eco-accommodation units (65m² each), accompanied by ancillary structures for staff accommodation (50m²) and equipment storage (80m²). The total development footprint is exceptionally low, only 2.7% of the site, leaving 97.3% in its natural state.

In terms of current land use rights, the property owner has the primary right to construct a dwelling house of unlimited size on the land, as well as one additional dwelling of 60m², under its current zoning. In contrast, this proposal, with its small development footprint, is highly conservation-oriented, with a minimal built footprint and a clear emphasis on protecting the site's natural character.

The placement of buildings has been carefully considered in consultation with environmental specialists:

- A Terrestrial Biodiversity Study confirmed that the proposed location is the least ecologically sensitive, as it is already affected by alien vegetation, making it preferable to other areas on the site.
- Given the site's proximity (within 100m) to the high-water mark of the ocean and the dynamic coastal processes, a geotechnical survey was conducted to ensure that the selected area is stable and suitable for development.
- A Visual Impact Assessment confirmed that the proposal will have a low visual impact, thanks to existing vegetation, natural topography, and eco-sensitive architectural design.

The proposal includes the full protection of the property through a rezoning from "Agriculture Zone I" to "Open Space III" (Nature Conservation), with consent to allow the three self-catering units.

The agricultural potential of the land is low, and any farming activities would result in significant environmental degradation, including loss of biodiversity, habitat destruction, and increased erosion.

The three self-catering eco-units could provide an alternative, sustainable revenue stream that supports conservation efforts without compromising the site's ecological integrity.

The proposed land-use change and development are fully aligned with the Knysna Spatial Development Framework, which encourages environmentally responsible land-use practices and National and Provincial conservation priorities.

In conclusion, this proposed land-use change and development is a low-impact, environmentally responsible solution that will allow the land owner to enjoy this unique property while protecting natural ecosystems. The Agriculture Zone I zoning permits much more development rights for the land owner, but agricultural use is neither feasible nor appropriate for this site, and conservation-focused development presents a far more beneficial, sustainable alternative.