

**KRAAIBOSCH / GLENWOOD LOCAL STRUCTURE PLAN**  
(Settlement Planning Services – Kobus Munro)

**PURPOSE**

To obtain a committee resolution for the proposed Kraaibosch / Glenwood Local Structure Plan (KGLSP) in terms of section 4(10) of the Land Use Planning Ordinance, 1985 (Ordinance 15 of 1985).

**Background**

The structure plan area as depicted on the attached structure plan map includes the following areas:

- Glenwood
- The riding club and the short golf course
- The Kraaibosch small holding area

Numerous development applications in this area have been submitted to the Council and most of the guide plan amendments have already been approved by the George Municipality and some have also been approved by the Department of Environmental Affairs and Development Planning.

During the initial public participation phases of some of these applications a concern was raised by the Council and also the Glenwood Conservancy, specifically, that ad hoc applications in this area should not be considered without an overall and holistic view of this area. The Town Planning Department decided to commence with a master planning exercise to prepare development guidelines for this area that would guide both developers as well as authorities at all levels when considering development applications.

In approving the guide plan amendments, the Minister of Environmental Affairs and Development Planning, Ms. Tasneem Essop, also insisted that an overall planning document for this area be prepared before any detailed development applications are considered by both the George Municipality and her own department. She furthermore insisted that this guideline document be approved in terms of the Land Use Planning Ordinance, 1985 (Ordinance 15 of 1985) to ensure that the document has legal status.

Whilst the guideline was initially referred to as the Kraaibosch Spatial Development Plan it was therefore decided to change the title of the guideline to be known as the *Kraaibosch / Glenwood Local Structure Plan* which would be approved in terms of section 4(10) of the Land Use Planning Ordinance, 1985 (Ordinance 15 of 1985). This also meant that the public participation process, already completed by the middle of 2007, had to be processed again in terms of the prescriptions of Section 4 of the above-mentioned act.

The *Kraaibosch / Glenwood Local Structure Plan* was therefore advertised again in terms of the Land Use Planning Ordinance and relevant government departments were afforded another opportunity to make input or suggest any amendments. The structure plan presented here today is therefore the result of a thorough public participation process which led to several amendments of the initial proposals. It is a document that now encompasses the aspirations of prospective developers, addresses the fears of surrounding land owners, complies with provincial and other policy guidelines and reflects the vision of the George Municipality for this area.

Once this document is adopted by the George Town Council, developers will have to ensure that individual project proposals adhere to the principles and guidelines contained in this document.

## **THE PLANNING PROCESS**

In this section a very brief description is provided of the planning process that was followed in reaching the final document as it stands today.

### **Step One: Baseline studies:**

Once the decision was taken to prepare a structure plan, the first step was to call on specialist service providers to provide required baseline information which would be used to formulate initial proposals. The following were done:

- *Broad Scale Environmental Sensitivity Analysis* – prepared by Ken Coetzee Environmental Management Services in collaboration with Sharples Environmental Services.
- *Agricultural Soil Potential Study* – prepared by T. A. Robertson.
- *Transportation Master Plan* – prepared by VELA VKE Transportation Engineers.
- *Slope Analysis* – VRM
- *Policy Overview* – Setplan Settlement Planning Services
- *Market Analysis* - Setplan Settlement Planning Services

### **Step Two: Initial Public Participation**

Before the first draft of the structure plan was formulated, input from all sectors of the community was obtained. The following groups of interested and affected parties were engaged:

- *The George Municipality* – Several meetings were held with the officials of the Town Planning Department, Town Engineer, as well as with the Municipal Manager, and acting Mayor, Mr. F de Swart. These meetings

were very important to establish a vision for this area and to understand the Council's intentions with municipal land portions also in the study area.

- *Surrounding Land Owners* – Several meetings were also had with this group, mostly with the Glenwood Conservancy. Here the views of the municipality, prospective developers and other interested and affected parties were conveyed and discussed.
- *Developers* – Several meetings were also had with the developers of the individual land portions. The views of the other groups were conveyed to them and their response to this was captured. This was an important group as they would be responsible for the implementation of the various policies and to develop the area accordingly.
- *Other Interested and Affected Parties* – This included all other interested and affected parties such as residents of nearby neighbourhoods, Rosemore, Loeriepark etc. It also included Government departments and community organizations and NGO's.

The public participation process was handled by public participation specialists in the employment of Sharples Environmental Services. A detailed report on all the methods of participation and minutes of all meetings as well as copies of all written submissions is available on request.

#### Step Three: First Draft of Kraaibosch / Glenwood Local Structure Plan

With the input from the first two stages of this process, i.e. the baseline studies and the initial public input, Setplan prepared the first draft of the structure plan (at this stage still referred to as the Kraaibosch Spatial Development Plan).

#### Step Four: Second Round of Public Participation

The First Draft of Kraaibosch / Glenwood Local Structure Plan was advertised for comment and again several meetings were held with all four main groups of interested and affected groups as listed in the previous paragraph. At this stage general consensus over the desired policy guidelines for this area was starting to emerge.

#### Step Five: Second Draft of Kraaibosch / Glenwood Local Structure Plan

Certain suggestions and input received from interested and affected parties necessitated the amendment of the structure plan, which gave rise to the Second Draft of Kraaibosch / Glenwood Local Structure Plan.

#### Step Six: Third and final round of Public Participation

As mentioned earlier, the final round of public participation was necessary to process the structure plan in terms of the Land Use Planning Ordinance and its prescribed advertising procedure in terms of Section 4(5) of the said Act. Only a few submissions were received from this final public participation round as the majority of developers and surrounding land owners have already accepted the principles contained in the structure plan. In fact most developers have already amended their development proposals to adhere to the contents thereof.

Step Seven: Third and Final Draft of Kraaibosch / Glenwood Local Structure Plan

Minor amendments to the Second Draft were necessary to accommodate final input from the third round of public participation.

Step Eight: Adoption of the Kraaibosch / Glenwood Local Structure Plan by the George Town Council

The structure plan is hereby presented to the Committee for a resolution.

## THE STRUCTURE PLAN

### 1. Introduction

The purpose of this section is to highlight some of the more relevant planning guidelines that the Council wish to implement in the study area. These guidelines or "best practice" goals can be seen as the desired spatial form or ideal end results of the planning process and are those spatial forms or patterns to strive for.

In reality, the most desired spatial forms are not always possible as various influences impact on the way a town or region develops over time. It is important however to strive for these desired spatial forms as these hold the key to establishing vibrant communities and effective urban structures. Some of these guidelines are very old and have been planning goals for decades, whilst others have emerged only recently as we learn and understand more about our environment.

Realities and specific circumstances result in these guidelines not being implemented in all areas. In Section 3, some of the realities that are present in the study area have been highlighted, and some of these may impact on the way desired spatial patterns are implemented or not. An example is the topography of the area that will require that an alternative view is adopted in some of the areas.

A further aspect that impacts on the implementation of desired spatial patterns is political interference. Planning decisions are not taken by technocrats, but by political leaders of the communities they serve. In some instances decisions

taken by political leaders or structures may not reflect good planning practice and will result in inefficient urban structures that do not function optimally. The structure of almost all South African cities and towns reflect social segregation where the poorest people reside the furthest from economic opportunities. The planning of these dysfunctional cities and towns were heavily influenced by the political agenda of an "apartheid government". Spatial reconstruction is therefore a very important guideline to attempt to integrate our cities and towns again. The danger of course is that political decision taking can again impact on sound planning principles and detract from creating vibrant and efficient urban places.

## **2** **Desired patterns of land use**

The desired pattern of land use is described in the following first planning guideline.

### **Guideline 1: Character**

*The Kraaibosch area has to develop as a natural extension of the Loeriepark suburb. The character of this area and the density will be similar to that of Loeriepark where a mix of low and medium density residential development can be expected. The recent trend to develop only security villages was identified as a concern and therefore an attempt will be made to force developers to develop a certain percentage of conventional free standing dwellings in this area.*

#### **Explanation:**

The Council is of the view that this area will have to accommodate the need for the type of housing that is currently provided in Loeriepark, Eden and Kraaibosch Country Estate. This can be classified as **medium to high income and medium to low density housing.**

The residential mix and percentage of free standing dwelling units are described in Guideline 2

## **3** **Density and Residential Mix**

### **Guideline 2: Density:**

*In order to achieve the required character, the residential mix between single-, group- and town housing has to be established. This 'mix' is to be applied by each individual developer and on each individual property to ensure that the overall density is achieved.*

**Explanation:** This guideline implies a number of important aspects, nl.

(a) The study area will mainly accommodate residential land uses, but there will also be limited non-residential uses present such as small business nodes with a convenience centre on the major intersections and churches and the proposed school.

(b) To achieve the required density a percentage of higher density housing is allowed. The guideline is that not more than 25% of the total area of Kraaibosch be utilised for high density housing. The remaining 75% of the property will accommodate single residential erven with a minimum erf size of 800m<sup>2</sup>. This implies that each individual development application and each property would have to comply with this guideline.

Developers can choose between two models, each with the same overall density of 13 du/ha:

(c) **Option one: Conventional 25/75 Residential Mix**

Under this option developers would locate pockets of land, not more than 2ha in extent and in total not more than 25% of the total area of the property, in suitable locations within the development, and rezone it to Residential Zone II. The remainder of the area (75%) must be developed for Residential Zone I erven with a minimum erf size of 800m<sup>2</sup>.

**Table 1: The density distribution on a 10ha example in terms of the 25/75 Conventional Residential Mix.**

<u>Land use</u>	<u>Density</u>	<u>% AREA</u>	<u>No.</u>	<u>% No.</u>
Group Housing	25du/ha	25%	62	48.8%
Single Residential	8 - 9du/ha	75%	65	51.2%
<b>Total</b>	<b>12,7 (13)</b>	<b>100%</b>	<b>127</b>	<b>100%</b>

Developers are furthermore referred to the Zoning Scheme Regulations for Residential Zone II properties with specific reference to the following clause:

**“3.4.4 (e) No group housing site may have an area greater than 2 ha, and no group housing site shall about on another group housing site.”**

In terms of this option, Site Development Plans (SDP) for each of the Residential Zone II erven must be submitted for Councils approval prior to the submission of building plans. No building plan in a Group Housing scheme (Residential Zone II) may be approved without an approved SDP. SDP's must be referred to Councils Aesthetics committee for a recommendation.

(d) **Option Two: Hybrid Scheme**

The Hybrid scheme is introduced to accommodate developments where the elements of a group housing scheme and that of a normal single residential development are integrated. Whilst the ownership remains freehold and therefore per definition zoned Residential Zone 1, the characteristics of a group housing scheme, i.e. the security, the architectural design, colour schemes, etc. are also applied. This type of development would therefore see that the smaller erven of the group housing component would be integrated and evenly dispersed between the larger single residential erven.

The density requirements for the Hybrid Scheme, like the conventional 25/75 residential mix, is also **13 du's/ha**, but the developer has the opportunity to provide a range of erf sizes. To ensure that the character of the study area remains that of a low density residential area at least 40% of the total number of erven in such a development would have to be at least 800m<sup>2</sup>. It is the developer's prerogative to choose the erf sizes for the rest of the development, providing that no erf shall be smaller than 300m<sup>2</sup>. A very important condition that the Council must insist on in all Hybrid Schemes is a SDP for the entire development. No building plans may be submitted or approved without an approved SDP for the whole property or development.

Aspects that will have to be considered in the Hybrid Scheme and which would have to be clarified in the SDP are the architectural style and colour themes, particularly roof colours. These developments would be very visible from Knysna Road and large developments with monotonous colour schemes, particularly roof designs and colours, should be avoided. Monotonous designs in terms of height and roof construction should also be avoided. The principle of architectural styles is introduced to ensure that where erven are smaller than the norm for an area, that the visual impact thereof is managed. Too many schemes have interpreted architectural guidelines to mean that all the structures should have the same appearance. Since the size of hybrid schemes will not be limited, this aspect is very important and the Aesthetics Committee of the Council should really apply their minds to ensure that large monotonous developments are not created.

**Table 2: A possible density distribution in a Hybrid Scheme on a 10ha example.**

<b>Erf size</b>	<b>Density</b>	<b>% AREA</b>	<b>No.</b>	<b>% No.</b>
800m <sup>2</sup>	8-9 du/ha	60%	52	40%
500m <sup>2</sup>	13-15 du/ha	15%	21	16%
300m <sup>2</sup>	23-25 du/ha	25%	58	44%
<b>Total</b>	<b>13,1 (13)</b>	<b>100%</b>	<b>131</b>	<b>100%</b>

(e) In the case of retirement villages which comply with the parameters of the definition of a 'retirement village' in the Section 8 Zoning Scheme Regulations, a departure from the guidelines in paragraph (b) may be considered. A retirement village that incorporates a medical care facility requires a certain number of units which would render the project economically viable.

Where a portion of land is too small and therefore the maximum of 25% for high density housing is not sufficient for the proposed retirement village, the Municipality may depart from principle (b), subject to:

***'The provision of a business plan indicating the economic viability of the proposed retirement village'***

(f) The high density housing areas would be limited to 'Group Housing' as provided for in the Section 8 Zoning Scheme Regulations. The density of group housing is up to a maximum of 25 du/ha. Strategically located apartment blocks or flats should be investigated on merit, specifically if the anticipated affordable housing guideline is enforced by the Department of Environmental Affairs and Development Planning or if developers wish to participate in this market and should be located at one of the major traffic intersections.

(g) Group Housing developments are to be located near or adjacent to the higher order roads to ensure that traffic flows do not affect the single residential areas situated further away from the collector roads.

**4 Spatial reconstruction and Inclusive Housing**

**Guideline 3: Affordable Housing and Integration**

***These policies are contained in the WCPSPDF and the George Town Council has committed them to achieving the goals set in this regard. The Kraaibosch area will have to adhere to these principles once finalized and adopted by the West Cape Government.***

**Explanation:**

It is important to note that the Department of Environmental Affairs and Development Planning is in the process of preparing guidelines in this regard which would assist local authorities in the implementation of this guideline. The guideline will also be legislated and it is suggested that the Council acknowledge the current process and is in a position to implement the policy once legislated.



Council wish to encourage developers at this stage to include affordable housing units in their developments and where developers wish to do so, higher densities for these projects will be granted in appropriate locations. The density that would be granted for affordable housing is that prescribed in terms of Residential Zones III and IV (Town Housing and Flats respectively).

As is the case with group housing these developments would have to be located near the main collector roads (walking distance to public transport). These zonings would only be permitted for *bona fide* affordable housing projects. Once this policy is finalized and legislated, Council will amend this KGLSP to be prescriptive and will lay down clear guidelines. In the interim, Council can merely request that developers consider including homes in the price categories earmarked for affordable housing.

## 5 Open Space

### Guideline 4: Open Spaces

***Public and Private Open Spaces should be provided in terms of Councils policy and the relevant Zoning Scheme Regulations (see explanations)***

#### Explanation:

- (a) Open Spaces should as far as possible be designed to form corridors, linking the various open spaces together. This will ensure that pedestrian and cycle routes could be planned, linking the residential areas with other public accessible areas (i.e. the Garden Route mall, schools, etc.) as well as the nature areas along the rivers and streams.
- (b) The guidelines for open space provision are as follows:
- Single Residential erven: 72 m<sup>2</sup> / erf
  - Group Housing : as per Zoning Scheme Regulations
  - Hybrid Schemes: 80m<sup>2</sup> / erf
- (c) The calculation for open space provision could include the steep areas below the 1:4 slopes if the steep areas have been developed to the satisfaction of the Council. Aspects that require attention include the following:
- Clearing of alien vegetation and the removal of rubble to enable the public to safely access this area.

- Construction of pedestrian and / or cycle path that link with the rest of the open space system
- (d) Open spaces along the streams and rivers are to be rezoned to Public Open Space systems and ownership thereof will vest with the George Town Council. The George Municipality will however only take transfer of the Public Open Spaces once it has been developed to the satisfaction of the Council. No development would be allowed to be registered at the Registrar of Deeds until this condition has been adhered to. This stipulation will also be a condition of subdivision of all developments in the study area. Refer to requirements of the SDP's

## 6 Natural Areas

### Guideline 5: Natural Areas:

*The steep slopes (slopes steeper than 1:4) as well as areas of conservation significance will not be developed and must be incorporated into a public open space system.*

### Explanation:

The "green areas" have been determined and mapped by the conservation team, Sharples Environmental Services and Ken Coetzee Conservation Management. These areas include areas close to rivers and streams, areas with conservation worthy vegetation and areas where conservation worthy vegetation can be rehabilitated.

The structure plan map only provides a schematic indication of where the natural areas are. Final alignment of the natural area boundary is to be determined by an environmental impact assessment of each development.

## 7 Visual Impact

### Guideline 6: Visual Impact

*The view towards the Mountains from Knysna Road and the N2 National Road will be affected by this development. Particularly the ridge area (where the existing gravel road is) will have a significant impact on the visual aesthetic appearance of this area and would require mitigation measures to ensure that visual integrity of this area is retained. Visual Impact Assessments could therefore be required by Council as a requirement for applications for township establishment in the study area.*

Explanation:

Currently, the area appears very green, and even the blue gum trees provide a green foreground against the backdrop of the Outeniqua Mountains. High density development on this ridge, as proposed in terms of guideline 3, would have to be screened in some way to protect this visual aspect.

PUBLIC PARTICIPATION: ADVERTISING AND COMMENTS RECEIVED

The application was advertised in the local press and surrounding land owners as well as relevant national and provincial departments, including the Eden District Municipality were requested to comment.

Please note that the initial public participation as well as the second round of public input was incorporated into the second draft of the structure plan. The following submissions and proposed amendments relate only to the advertising of the second draft of the structure plan. Some of the suggested amendments have been incorporated into the third and final draft of the KGLSP, but the majority of these could not have been accommodated. In each instance it is indicated whether the suggestion has been incorporated, rejected or just noted as far as the final draft is considered.

A total of six (6) submissions were received. The following is a short summary of the submissions received:

Summary of submission by Jan Vrolijk Town Planner on behalf of Abrina 1338 (Pty) Ltd. (Owners of Portions 320 and 63 of Kraaibosch 195, George)

- Suggestion that the indication on the structure plan map of the public open space be regarded as schematic and that the final alignment be made subject to an environmental impact assessment as well as detailed contour survey and slope analysis. *(Incorporated)*
- Suggestion of an increase of the maximum density from 12.7 to 15.2 dwelling units per ha by reducing the minimum property size from 800m<sup>2</sup> to 600m<sup>2</sup>. The main reason given for this is the anticipated high density that may be developed on the George Riding Club. The goal of an average density of 25 dwelling units per ha is also quoted as motivation. *(Rejected)*

Summary of submission by Stadler and Swart Attorneys on behalf of Quickstep 442 (Pty) Ltd.: (Owners of Portion 52 of Kraaibosch 195, George).

Portion 52 is situated immediately to the north of the approved Kraaibosch Country estate and to the east of the George Riding Club. They made the following suggestions:

- Proposed name change from "Kraaibosch Spatial Development Plan" to "Kraaibosch / Glenwood Local Structure Plan" to attach correct legal status to guideline. *(Incorporated)*
- It is proposed that the structure plan provides more detailed proposals regarding specific land uses such as high density developments, business nodes as well as other community facilities. *(Rejected)*
- It is also suggested that Portion 52 be identified for such higher density development due to its location next to a high order road and next to the proposed development on the riding club. *(Rejected)*
- It is suggested that the contents of draft regulations earmarked to guide the preparation of Spatial Development Plans be used to determine the content of the Kraaibosch / Glenwood Local Structure Plan. *(Rejected)*
- It is suggested that higher densities be allowed next to activity spines and other higher order roads specifically with reference to Portion 52. This is to allow the orderly development of the rest of the area. *(Incorporated)*
- The Riding Club would also be limited to the same density requirements and any development proposal on the riding club would be in contradiction hereof and therefore also in contravention of an official council guideline. The fact that the Council has not limited the potential bidders to the proposals contained in the KGLSP means that the Council is not in agreement with the proposals of the KGLSP. *(Rejected)*
- It is alleged that the Council would not be able to amend the KGLSP at a later stage to arbitrarily benefit itself in order to accommodate any proposal on the riding club that is substantially in conflict with the current proposals of the KGLSP. *(Incorporated)*
- It is Council's responsibility to firstly investigate the community needs in so far as that could be addressed by any development of community infrastructure on the riding club, before the land is sold on tender. Council would not be in a position to purchase private land for community facilities at a later stage due mainly to the very high costs of land in this area. Council should liaise with relevant government departments in this regard before this land is developed. *(Incorporated)*
- It is alleged that Portion 52 has been identified as a possible premises for a school and Messrs Stadler and Swart points out that alternative premises on public land, noticeably the Riding Club is more suitable for this purpose. *(Incorporated)*
- It is pointed out that the KGLSP cannot be approved whilst it is in conflict with the George and Environs Guide Plan. *(Noted)*
- Messrs Stadler and Swart object against the proposal that high density developments be limited to Group Housing developments as well as the reference in the KGLSP to the restrictions that applies to these zonings. *(Rejected)*

- it is alleged that the Council as a whole is not in agreement with the proposals of the KGLSP specifically if their intentions on the riding club is considered. *(Noted)*
- No consultation with government authorities has been done and the Structure Plan can not be approved in its current form. *(Rejected)*
- The inclusion of guidelines regarding social integration is not legal and should be removed. *(Incorporated)*

Messrs Stadler and Swart recommend that the Municipality amends the George and Environs Structure Plan before the KGLSP is finalised and approved by the Council.

Summary of submission by the Moretti Family Trust (Owners of portion 56 of Kraaibosch 195, George).

- We do not agree to just give our land away – in reaction to the proposal that public open space be transferred to the municipality. *(Incorporated)*
- The proposed road that runs through Portion 56 is not beneficial to the owners of the land. *(Noted)*
- Escom power lines along the servitude is unacceptable, a health hazard and visually very intrusive. *(Incorporated)*
- Loss of recreational space if Riding Club is developed. *(Noted)*
- Endorse the comment of the Glenwood Conservancy. *(Incorporated)*

Summary of submission by the Glenwood Conservancy Association (GCA)

The GCA has played a very active and constructive role through the entire structure planning process and has submitted several documents that have greatly influenced the structure and proposals of the current KGLSP. Their earlier submissions have been incorporated into the structure plan and this section only deals with their recent submission. Please note that their previous submissions were again attached to the current and latest document dated 5 February 2008.

- The GCA feels that the Glenwood House School and college as well as the driving range should form part of the planning of this area. *(Noted)*
- The impact of development of the Garden Route Dam should also be considered and planned for as this traffic will also flow through Glenwood and Kraaibosch. *(Noted)*
- The development of the Riding Club without proper planning is objected against. Certain meaningful suggestions have been included and are attached hereto for information. *(Noted)*
- Water – do we have sufficient supply? *(Incorporated)*
- Electricity – the existing high voltage power lines are totally unacceptable in a residential area and should be re-routed outside the new urban edge. *(Incorporated)*

- Apart from the unnecessary destruction of Glenwood Avenue by changing it from a cul-de-sac into a main feeder for the new suburbs and insensitive road placement elsewhere by "Road Engineers" who don't even live in George, informed comment on this section of the SDP cannot be made without at least:
  - Clear schematic diagrams of the proposed junction at the east end of Glenwood Avenue showing how, as we have been promised, traffic will be "encouraged to use alternative routes." *(Noted)*
  - Clear indication on how the anticipated 1000+ cars are to access Glenwood House School twice a day. The obvious solution here is to put a slip road parallel to Knysna Road. There already is one serving the Golf Course and Driving Range which could simply be extended to join the new Kraaibosh entrance at the electrical sub-station but this seems not to have been considered viable for some mysterious and closely guarded reason. *(Noted)*
  - Explanation of the necessity for the N2 link road at the extreme south-east of the area. This would seem to serve little purpose other than to allow Loerie Park and Dam dwellers a short cut through the Kraaibosch/Glenwood neighbourhoods to the Mall to the detriment of local residents. *(Noted)*
  - As mentioned before, although not a part of this study, the development of the Dam area will greatly affect traffic through the area. One must ask whether Vela VKE are aware of this and what provision has been made for this in the "Kraaibosch Roads Master Plan". *(Noted)*
- Construction Management Guidelines should be made mandatory on all construction activities. *(Incorporated)*
- The one proviso to this is that there should be a clause in all new Title Deeds that prohibits subdivision or sectional title schemes of all new properties in the area. The size criteria for economic viability of retirement complexes should be carefully assessed; the availability of new and planned Medical facilities in George may well mean that these complexes may be far smaller than is now considered the case. *(Incorporated)*
- The GCA agrees "that steep slopes and areas of conservation significance will not be developed" but does not agree that they "must be incorporated into a public open space system". In this instance the word "must", should be replaced with "could". The point is here that in some instances a developer may wish to use the undevelopable parts of his terrain as a feature or amenity to be enjoyed by residents of his own development. In this case he should not be forced to give it over into municipal care for the use of all and sundry. *(Incorporated)*
- As mentioned before, if Eskom are allowed to upgrade the existing power line along the side of the Riding Club so that it becomes a row of 15m high steel pylons, then one might as well not bother about the visual impact of

other developments in the area, it will be ruined anyway. It's bad enough that Eskom fails in its primary duty to supply power to the Country; it must not be allowed to ruin Kraaibosch as well. (Incorporated)

Summary of submission by the Department of Economic Affairs and Development Planning:

- The development density of only 13 dwelling units per ha indicates that this area will only accommodate high income housing. This is inappropriate as the market demands housing in the affordable market as well. The density is also too low and does not comply with the Provincial Spatial Development Framework: **(Incorporated)**.
- More mixed uses is encouraged with business facilities and flats on top to encourage cycling and more people to stay close to employment opportunities. **(Incorporated)**
- Affordable Housing – the name should be changed to affordable housing **(Incorporated)**
- Affordable Housing – The tables under the density options should be amended to make provision for the higher densities required for affordable housing **(Incorporated)**
- Affordable Housing – the norm is that 20% of developments should be allocated to affordable housing. **(Noted)**
- Affordable Housing – The Kraaibosch Structure Plan does not indicate where the economic housing should be located. **(Incorporated)**.
- Integration of land uses – more non residential uses should be introduced. **(Incorporated)**
- Other facilities – the facilities at the Garden Route Mall is too far to be integrated with this development. **(Incorporated)**
- School Premises – this aspect should be discussed in further detail with the education department **(Incorporated)**
- The public open spaces should not be limited to the river courses and steep areas. **(Incorporated)**
- Certain areas still not in the urban edge – the department is currently scrutinising this aspect and will consider these areas as infill development **(Noted)**
- Alignment of the N2 national road must still be approved in terms of the National Environmental Management Act. **(Noted)**
- Building Material – an analysis should first be done before the structure plan is approved **(Rejected)**
- Vegetation – Analysis did not include a map, therefore we could comment. **(Noted)**
- Water availability questioned **(Noted)**
- Suggestion for sewerage treatment **(Incorporated)**
- Kraaibosch Roads Master Plan – this approval has not been issued and no comment can therefore be given. **(Noted)**.
- Suggestions how to handle storm water. **(Noted)**

- Nature areas – there needs to be a wide corridor along the Swart River. (Incorporated)
- Visual Impact – An impact assessment should first be done before the structure plan is approved. (Rejected)

### **RESPONSE TO COMMENTS AND SUGGESTED AMENDMENTS**

Those suggestions indicated with “Incorporated” were in fact incorporated into the third and final draft of the KGLSP as these represented good planning practice and highlighted shortcomings in the second draft. No further discussions of these aspects are necessary.

Aspects indicated with “Noted” do not really impact materially on the structure plan at this stage or represent aspects the structure plan has no mandate over. We feel that these aspects should still be brought to the attention of the Council regardless its value for this process.

Those aspects indicated with “Rejected” could unfortunately not be accommodated or incorporated for reasons outlined herein below:

- **Density requirement** – this aspect was discussed at length with relevant councillors on several occasions at the time and the town planning department based its decision on surrounding developments such as the proposed Garden Route Dam proposal, Glenwood, Kraaibosch Country Estate as well as the existing Loeriepark. The majority of developers have already amended their plans to reflect the proposed densities and have progressed to advanced stages with development applications. We recommend that this aspect remains as contained in all three drafts of the guidelines.

It is simply not true that this density does not comply with the PSDF. The PSDF prescribes densities from as high as 80 du/ha in the central areas of towns down to as low as 8 units per ha on the periphery of towns. This density of 13 du/ha is appropriate for this area as this on the urban edge of George.

- **More detailed guidelines** – we do not support this suggestion as we are of the opinion that the KGLSP incorporates sufficient detail to assist the Council with decision making. A structure plan should also be flexible enough to allow the market to take certain decisions. The land uses (apart from residential) referred to by the I&AP have been indicated – other land uses are discouraged.
- **Higher densities for Portion 52** – we do not support this suggestion for a variety of reasons. The allocated higher density opportunity for this area should be sufficient and should be located near the higher order roads and intersections. This is acknowledged already in the guidelines but there is



not sufficient motivation why this specific land portion should be allowed a higher density than any other portion in this study area. All land parcels adjoin busy streets and should be treated equally. The developers amongst themselves have agreed to this density and those who have already submitted their applications have planned their developments accordingly. This guideline is important and should remain unchanged.

- **Draft Regulations for Spatial Development Plans** – these do not exist yet and may be amended several times before enactment, if ever. Certain of these pieces of legislation are already more than ten years in preparation. There is no way to predict whether these would be accepted or not. It does not apply to structure plans in any event.
- **Riding Club** – the KGLSP makes provision for almost any development proposal on the riding club property. Messrs Stadler and Swart clearly had an old copy of the KGLSP as the document that was circulated clearly indicated the riding club's situation. The development of this area cannot be informed by proposals on the riding club. The contrary is true – development on the Riding Club will be informed by what is already in existence including the land use proposals for the surrounding land. The deputy mayor, Mr F. de Swart gave the Glenwood Conservancy the assurance that any development on the Riding Club will not be detrimental to their existing properties. The structure plan accommodates the riding clubs existing process and will not be in conflict with the development thereof.
- **No consultation with government departments** – this is of course not accurate. Refer to the specialist report on public participation.
- **Affordable Housing** – The Department of Environmental Affairs and Development Planning did not succeed in introducing this guideline and in fact lost a high court case over this issue. The court ruled that it is illegal to introduce these measures. It cannot be expected of the George Municipality to introduce these measures, we will open ourselves for similar high court action. We state clearly in the plan that the government's plans in this regard will be supported once it is approved and the guidelines have been prepared. Only then will higher densities be allowed in appropriate locations, next to the bus routes, etc.
- **Building Material** – The condition to ensure that building materials are not sterilised emanates from the PSDF and we merely refer to this aspect in the KGLSP due to its inclusion into the PSDF. To expect the council to prepare such a plan prior to any development being approved will seriously hamper the progress of the development of this area. It is suggested that the individual developers conduct such a survey on their costs.
- **Visual Impact** – the same applies to this aspect. We do not recommend that the council prepare these studies, but that the developers be responsible for the work and the costs.

Die ontwikkeling van die Kraaibosch / Glenwood area het noodsaaklik dat die Raad 'n beleid ten opsigte van die groter gebied moet aanvaar alvorens daar na individuele aansoeke gekyk kan word.

Die Minister van Omgewingsake en Ontwikkelingsbeplanning het ook as voorwaarde vir die goedkeuring van die gidsplan wysigings aangedring dat so 'n oorhoofse plan opgestel moet word. Die opstel van die Kraaibosch / Glenwood Plaaslike Struktuurplan is aangepak deur 'n span konsultante en 'n baie intensiewe publieke deelname proses is gevolg waar alle partye insette kon lewer.

'n Gestruktureerde publieke deelname proses het verseker dat verskillende belangegroepse gecoëgsame geleentheid gegun word om sinvolle insette te lewer. Baie sinvolle insette is ontvang en die plan is na vele wysigings gereed om na die raad verwys te word vir goedkeuring. Die voorskryfte van die struktuurplan is alreeds deur die ontwikkelaars aanvaar en die aansoek wat reeds ingedien is voldoen reeds aan die voorstelle.

#### RECOMMENDATION

1. That in terms of Section 4(10) of the Land Use Planning Ordinance, 1985 (Ordinance 15 of 1985) the George Town Council approves the five guideline principles (as contained in this item under paragraphs 1 to 6) together with its explanations and the structure plan map, referred to as the Kraaibosch / Glenwood Local Structure Plan.
2. The approval is subject to the following:
  - a. The structure plan is only applicable to those areas where the George and Environs Guide Plan has already been amended to township development by the Minister of Environmental Affairs and Development Planning.
  - b. Where the guide plan has not been amended yet, the provisions of the guide plan will still be applicable and the KGLSP will not be in force.
  - c. The KGLSP will be revisited and amended if required once the Council has approved a development application on the Riding Club land.
  - d. The KGLSP will be revisited and amended where necessary to accommodate any legislative changes such as anticipated for affordable housing.