

GEORGE MSDF 2019: ADDENDUM 4

LEGISLATED PUBLIC PARTICIPATION PROCESS

SCHEDULE OF RESPONSES TO COMMENT

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SUMMARY SCHEDULE OF COMMENTS RECEIVED AND RESPONSES THERETO

A	PUBLIC COMMENTS RECEIVED AND MUNICIPAL RESPONSES		
	PUBLIC COMMENTS RECEIVED	STAKEHOLDER / OBJECTOR WITH INDEX NO.	RESPONSE
1	Administrative issues re insufficient public notices and participation, simplified language to explain the principles clearly and concisely.	M de Bruyn No. 47 (5 December 2018), Springstan Pty Ltd No. 41 (5 December 2018), B Stokes No. 38 (5 December 2018), Glenwood Conservancy Association No. 61 (5 December 2018)	Detail of public participation and stakeholder engagements is summarized in Addendum 3. The participation process exceeded expectations of legislation and care was taken to ensure that public notices were posted at all municipal buildings and public libraries. The local press and all municipal social media platforms were used to broadcast opportunities to participate and comment. An executive summary will be drafted.
2	Positive support on many aspects of the SDF	J van der Merwe No 6 (5 November 2018), M Botha No. 14 (28 November 2018), EFF No. 56 (5 December 2018), C Botha No. 3 (4 December 2018), Z Eckert No. 70 (5 December 2018), R Lauwrens No. 83 (5 December 2018)	The inputs and affirmation are welcomed as the quest to align decision making with government policy while meeting both social and economic need of the local society is a challenge that can only be resolved through collaboration with all affected parties.
3	Objection against SDF as a whole. Issues raised are: there is not enough infrastructure capacity. There is not enough water to cope with future growth, the special character of George will be ruined, not enough work for population increase, lack	I van Wyk No. 60 (5 December 2018), R Nolan No. 71 (05 December 2018), FR Hill No. 25 (4 December 2018), G Wilkins No. 35 (4 December 2018), S Kemp No. 28 (04 December 2018), M Mitchell No. 65 (5 December 2018), Groenkloof petition No. 43 (5 December 2018), R Nolan No. 71 (05 December 2018 – D Kotze No. 36 (4 December 2018), Letazha No. 82 (5 December 2018),	In terms of legislation the local authority is compelled to have an SDF. Forward planning for a growing town is in any case essential and it is the tool with which shortages and risks are identified and addressed. There are also master plans for water and other services which address future demand based on what is set out in the MSDF. The MSDF ensures that land development decisions are aligned with the municipal Integrated Development Framework. The MSDF is not new to the city, as an existing MSDF, approved in 2013 precedes it and requires update. Much of the strategies for growth have already been applied since the inception of the former MSDF and this amendment seeks to improve on the existing strategies. The implementation of the MSDF over the long term will be guided by the availability of services and infrastructure.

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	of public transportation in kraaibosch/groenkloof.	J du Plessis No. 66 (5 December 2018) JE Eades No. 50 (5 November 2018) A Brandt No. 73 (6 December 2018) M von Waltsleben 74 (6 December 2018)	<p>The SDF is compiled in terms of the SPLUMA principles which includes spatial justice and sustainability. SPLUMA furthermore requires that the long-term fiscal impact of spatial proposals be addressed. This approach necessarily leads to densification and changes to the present character of the town. To achieve the above restructuring goals of SPLUMA, the status quo of the town cannot last forever. It is inevitable that change will happen in the future but the MSDF is guiding change in terms of acceptable norms in urban design and sustainable planning.</p> <p>It is uncertain what type of spatial planning Mrs van Wyk would like to see which will retain the present character of the town while at the same time achieve structural change to address the legacy of Apartheid. The densification proposal for Knysna Road/ Courtenay Street has been removed which may assist in meeting her concerns. Many other proposals for proper urban design, landscaping and preservation of an open space system are made in the MSDF.</p>
4	Heritage concerns	Heritage Trust No. 45 (05 December 2018),	Responses to heritage related aspects are captured in section C (among other, refer to lines: 45, 46 and 51) of this consolidated response document.
5	Urban edge concerns	M de Bruyn No. 47 (5 December 2018), Springstan Pty Ltd No. 41 (5 December 2018) Anria de Vos No. 49 (5 December 2018)	See the response in no 32 below which is also applicable to the extension of the urban edge in an eastward direction as a whole. The positive aspects mentioned alone do not weigh up against the broader objectives of the MSDF in terms of the SPLUMA principles, the fiscal impact and the existing spatial budget for which sufficient land for residential development is available within the urban edge.
6	Too much development proposed on the eastern side and too little on the western side	L Murray No. 20 (3 December 2018)	As the densification proposal for the Knysna Road reserve has been omitted, there will be more balance. The development of the show grounds area, restructuring sites identified on the southern end of York Street and the Syferfontein site in Pacaltsdorp, as well as the intensification of the western corridors indicates balance in the town structure.
7	Densification proposals for York Street	M de Bruyn No. 47 (5 December 2018), Springstan Pty Ltd No. 41 (5 December 2018), C Botha No. 3 (4 December 2018),	Densification of the CBD has been a longstanding objective aimed at increasing thresholds in the CBD toward promoting viable business and economic growth. The proposal in the MSDF is conceptual and will require detailed guidance. Objectors do not consider how York Street from a NMT and heritage perspective could be improved by new development.

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		C de Lange No. 33 (04 December 2018) and some of those below	
8	Densification proposals for Knysna Road	<p>Springstan Pty Ltd No. 41 (5 December 2018),</p> <p>C Botha No. 3 (4 December 2018),</p> <p>C de Lange No. 33 (4 December 2018),</p> <p>D de Swardt No. 68 (5 December 2018),</p> <p>E Mackay No. 79 (4 December 2018),</p> <p>E Roodt No. 82 (5 December 2018),</p> <p>H Roodt No.83 (05 December 2018),</p> <p>F Holm No. 29 (5 December 2018),</p> <p>G Claassen No. 87 (12 December 2018),</p> <p>J Godfrey No. 63 (5 December 2018),</p> <p>J van der Merwe No. 6 (5 November 2018),</p> <p>K de Kock -No.4 (4 November 2018),</p> <p>L Kelland No. 31 (04 December 2018),</p> <p>L Kotze No. 54 (5 December 2018),</p> <p>L Murray No.20 (3 December 2018),</p> <p>M Pelser No. 34 (4 December 2018),</p> <p>M Mitchell No. 65 (05 December 2018),</p> <p>N Colton No. 59 (5 December 2018),</p> <p>Lavalia /Rosemoor petition No.15 (29 November 2018)</p> <p>R Heiberg No.24 (5 December 2019),</p> <p>S Brand No. 23 (03 December 2018),</p> <p>S Branford No. 53 (5 December 2018),</p> <p>S de Jager No. 32 (4 December 2018),</p> <p>S du Plessis No. 18 (3 December 2018),</p> <p>CS Jardine No. 75 (7 December 2018),</p> <p>Groenkloof petition No. 43 (5 December 2018),</p> <p>Z Eckert No. 70 (5 December 2018),</p> <p>Glenwood Cons Assoc No. 61 (5 December 2018),</p> <p>R Lauwrens No. 83 (5 December 2018)</p>	This proposal has been removed from the MSDF

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		A de Vos No.41 (5 December 2018) A & W Colton No. 64 (5 December 2018) F Wepener No. 19 (3 December 2018)	
9	Economy of the town. Conserve and capitalise on the existing economic producers.	Glenwood Cons Assoc No. 61 (5 December 2018)	Agreed. The three spatial development strategies - consolidate, strengthen and smart growth – are aimed at improving what George has as assets. Section 4.3 refers to the strategies to achieve this.
10	Population growth and vacant land, including more provision of land for estates where the highest demand and growth occurs.	Springstan Pty Ltd No. 41 (5 December 2018)	The spatial budget is calculated in the MSDF and the Status Quo report. The Kraaibosch area alone still has about 168 ha of undeveloped land which could potentially provide for 1680 units, at a conservative density of 10 dwelling units per hectare. This is adequate supply of developable land to would cater for the demand for the next 5 years, at least. Furthermore, it has been calculated that developers had about 1400 unsold erven in 2017 in estates which could still be put on the market. In the long run, the next MSDF review in 5 years will have to consider the position further but it is foreseen that inclusivity will continue to play a more prominent role to ensure greater diversity and affordability in the property market.
11	Council is going to build 11000 – 12000 subsidy units on the riding club land and/or in the Knysna road reserve near Glenwood	I van Wyk No. 60 (5 December 2018), K Holloway No. 86 (8 December 2018), Groenkloof petition No. 43 (5 December 2018) Facebook post No. 22 (03 December 2018)	<p>This perception is ill-conceived and appears to have its origins from posts on a facebook page that has mis-interpreted the strategies defined in the MSDF. The projected potential residential opportunities do not include subsidised Human Settlement development. The sites identified for the human settlement pipeline was not included in the calculations of the spatial budget. It was calculated that there are between about 11800 and 15200 existing residential opportunities available within the urban edge.</p> <p>The exact locality of these opportunities is not pre-determined nor has it been determined yet whether these developments will be state driven or private sector driven. The assumption that all these units will be built near Glenwood is not endorsed in the MSDF and is seemingly an ill-perceived notion not originating from official planning processes. Maps in the MSDF clearly illustrate where all the infill opportunities in the city is. It is wrong to assume that all infill development will be comprised of subsidised housing as many infill opportunities are in private ownership. Insofar as municipal land is concerned, the municipality is a responsible developer and will in accordance with its IDP continue to strive to develop quality living environments.</p>

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12	Support for densification, spatial justice, social housing	EFF/H Scheepers No. 56 (5 December 2018)	The principles of the national SPLUMA legislation are applied.
13	No meaningful support for development around the Garden Route Mall as an important node for economic activity.	M de Bruyn No. 47 (5 December 2018)	The Eastern Commercial node is clearly identified in the MSDF as a priority investment area and consist of several hectares of suitably zoned, serviced and undeveloped property. The large tracts of undeveloped sites in the node is sufficient to provide in the demand of a number of years.
14	Insufficient linkages between existing open spaces and improved utilization needed. More guidance on protection of open spaces needed.	M de Bruyn No. 47 (5 December 2018), Glenwood Cons Assoc No. 61 (5 December 2018)	It is agreed and a policy for an integrated open space system is embedded in Policy A4 with nine guidelines on how to create an interactive, integrated open space system. It is not practical at this level of planning to show detailed proposals for all the open spaces, but the plans have now been improved to articulate the open space system more clearly and highlight the importance of the river systems.
15	Social facilities insufficient, land for non-residential uses to be identified. School sites must be provided and planned in an imbalance across the town.	M de Bruyn No. 47 (5 December 2018), CS Jardine No. 75 (7 December 2018), Glenwood Cons Assoc No. 61 (5 December 2018), R Lauwrens No. 83 (5 December 2018)	It is agreed and the objectives and spatial structure of the MSDF provide the framework for such provision. Policy A2 contains 8 guidelines in terms of which such facilities must be provided. Furthermore, the identified corridors for investment will provide the spatial areas where the implementation must follow. The level of planning does not allow for spatial allocation of land for social facilities and this has to be further pursued in the LSDF's. The need for health and educational facilities have been identified and budgeted for – see Table 13. The provision of these facilities is subject to the policies and budgets of the respective provincial departments. The Council has a 2012 report and survey of social infrastructure wherein certain recommendations were made based on the Provincial standards for facilities. This document should be updated according to the latest needs and guidelines, taking into account the objectives and Policy A3 in the SDF. Locational aspects should be addressed in the LSDF's.
16	Insufficient land for industrial development provided	M de Bruyn No. 47 (5 December 2018)	There is about 262 ha of commercial, industrial and business land available within the urban edge for development. With the principle of mixed development and investment in the identified corridors in mind, there might be much more opportunities available than the above size of land indicated. The municipal owned land around the Gwayang WWTW, behind the show grounds has been planned for industrial purposes and the detail is captured in the Gwayang

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			Local Spatial Development Framework. This land is still undeveloped and is included in the above land size.
17	Traffic and roads issues, including the Roads Master plan to be retained and shown. Extend GoGeorge to the airport.	R Robertson No. 10 (2 November 2018) M de Bruyn No. 47 (5 December 2018), J van der Merwe No. 6 (05 November 2018)	Articulation of the accessibility and mobility network in the MSDF has been revised and improved.
18	CBD economics and parking: York Street densification will be detrimental to businesses inside the CBD and will increase parking problems. GoGeorge to be more intense over short distances in the CBD.	M de Bruyn No. 47 (5 December 2018) R Lauwrens No.83 (5 December 2018) A de Vos No.41 (5 December 2018)	Refer to line 7 above. The GoGeorge system is continuously being expanded. The future revision of the CBD LSDF and a future densification study will further assist in promoting the CBD economy and providing design guidance for this conceptual proposal. Within the overall context of the MSDF and its policies, emphasis is placed on the enhancement of the economic growth of the CBD. It is a standard principle that parking standards can be lowered in zones with public transport – this will be further investigated for certain areas in the revision of the CBD LSDF. The majority of George residents travel by foot and the spatial strategy is aimed at creating residential opportunity for such citizens closer to their place of work, further reducing dependency on private vehicles.
19	Capacity of infrastructure: insufficient for growing town	F Hill No. 25 (4 December 2018), I de Lange No. 26 (4 December 2018), M Pelsers No. 34 (4 December 2018), S Kemp No. 28 (04 December 2018), Groenkloof petition No. 43 (5 December 2018), Glenwood Cons Assoc No.61 (5 December 2018), R Lauwrens No. 83 (5 December 2018)	Infrastructure planning is managed by sectoral plans as listed in Table 12 and discussed in Section 5.2.3. As a growing town the sectoral plans for infrastructure are constantly monitored and updated. The demand in the housing pipeline is taken into account in the upgrading of the bulk infrastructure. The purpose of an MSDF is to identify the municipality's growth potential and growth management plan to inform infrastructure planning. This has been done with a keen awareness for the fiscal constraints faced by the municipality and for this reason a focus on optimising existing infrastructure is prioritised by the MSDF.
20	Oppose the intensification of land use in the 500m activity corridors., Alignment	J van der Merwe No.6 (5 November 2018) R Lauwrens No. 83 (5 December 2018)	This is a key principle to achieve a compact settlement pattern based on public transport as the priority mode of transport. The proposal is possibly misunderstood as no open space corridors are referred to but rather the existing transport corridors. The strategy will align and concentrate mixed uses instead of allowing them to sprawl all over the town. Thereby public and private transport will

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	with priority nodes will cause traffic congestion		be better integrated along the main routes, harnessing greater efficiency as linkages with existing nodes will be optimal.
21	Sustainability issues, the burden of densification on energy and water resources.	R Fincham/S Stead No.55 (15 November 2018), Glenwood Cons Assoc No. 61 (5 December 2018), R Lauwrens No. 83 (5 December 2018) H Coates No. 40 (2 December 2018)	Urban growth is unavoidable, how it is managed can impact on efficiencies and sustainable resource consumption. The projections made in the MSDF enables service departments to plan and phase the implementation of improved infrastructure delivery strategies. Increasing demands on natural resources as a result of urbanization and climate change is not unique to the city of George. Smart living and renewal of resources are principles endorsed in the MSDF to ensure continued quality service delivery.
22	Unique character of George to be preserved. To be taken into account in densification plans.	Glenwood Cons Assoc, No. 61 (5 December 2018) R Lauwrens No. 83 (5 December 2018)	Agreed. This is a strong principle of good urban design. Furthermore, overlay zones and precinct plans will have to provide guidance on how to preserve the character of the town.
23	Formalising backyarding unacceptable as it will create slums	R Lauwrens No. 83 (5 December 2018)	The George Integrated Zoning Scheme By-Law provides for second dwellings on properties as of right. Second dwellings are an accepted form of income for households and meeting the housing demand. It applies to all single residential properties areas across the municipal area George. Presently there are about 8200 households staying in backyards in George and they are using existing infrastructure. The formalising thereof will largely reduce land consumption and improve circumstances for these households. Structures must still comply with National Building Regulations and Standards.
24	Broadband for all is not a priority as the lack of basic services must be solved first.	R Lauwrens No. 83 (5 December 2018)	It is agreed that basic services are a priority. Broadband is considered a basic service by many educational studies and can be provided parallel to other basic services. It is infrastructure required to promote economic development and can assist with improving educational outcomes. There is no conflict with any other strategy in providing wi-fi services as widely as possible in priority areas and this is already taking place.
25	Local Media Publications (George Herald)	M Hau Yoon No. 80 (22 November 2018)	Overview of Town and Heritage: Noted
26	Densification of Informal Settlement (erf 329) in	WRRRA No. 12 (27 November 2018)	<ul style="list-style-type: none"> The statement in the MSDF to upgrade and formalize the existing informal settlement is misconstrued as an intent to expand the settlements. The

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<p>Wilderness Heights Availability of bulk services Concerns regarding the preservation of natural landscapes (N2) Coastal Management Line unclear Historical Assets Maps unclear and no alternative to high resolution maps available Concerns about availability of funding to execute plans</p>		<p>municipality and housing authorities have over the past 12 years made attempts to relocate these communities with no success as it is also clear that their locality is determined by various factors, some of which supports their livelihoods. It would not be good governance to allow the residents of these communities to remain in the undignified settlement arrangements they are currently locked in, hence the MSDF supports efforts to formalise the settlements which would result in solutions for needed services and social amenities that support dignity and social well-being. Part of such an initiative would require that holistic solutions be sought to improve the living conditions and sustainability of the development. Funding for human settlement development is sourced from government and has already been set aside in respect of the Wilderness Heights development.</p> <p>Details regarding the proposed development was not available at the time of development of the MSDF as the planning was still in inception phase and required an endorsement from Council and the sponsors before engagement with Interested and Affected Parties could commence. All human settlement development is managed in a transparent manner and public participation generally exceeds the expectations of legislation and most certainly includes ward-based engagements as well whereby inputs and recommendations from the community is applied to finalise the layouts for final submission and consideration of the land development application.</p> <p>Portions of Erf 327 in Wilderness Heights will form part of the employment and subsistence solutions developed for the residents at 329 but is not intended for expansion of the settlement. The number of beneficiaries for this development will be limited to existing residents, details of which is held with the Human Settlements Directorate.</p> <p>Due to past planning practise that was not inclusive or equitable some human settlement development does not enjoy the same level of service as others. This may be in respect of quality of civil and electrical infrastructure; availability of social infrastructure; public transport infrastructure and amenities, etc. and requires re-development or regeneration as part of our efforts to redress injustices.</p> <ul style="list-style-type: none"> • The MSDF must align with national and provincial planning and policy. Although road reserves have been banked in view of the future re-alignment, the planning and execution of the road has been affirmed to be a long-term
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			<p>objective. Only once final feasibility studies have been made will the need for de-proclamation and re-alignment be confirmed. Until that time the MSDF needs to reflect the status quo.</p> <ul style="list-style-type: none"> • Policy D2(f) has been amended to limited development below the 5m contour line. The coastal management line and flood risk areas have been determined by the Western Cape Provincial Government in terms of the Integrated Coastal Management Act, 2008. The full details of the methodology and findings of the investigation can be obtained from the Department of Environmental Affairs and Development Planning and is captured in a separate report. The 5m contour line is applied as a flood risk area and can only be altered where flood lines have been modelled. The CML does stretch inland as these catchments are linked to the coastal system and development within impacts the coast. • Policy directives in respect of heritage has been expanded. • Supply of bulk services in order to meet current and future demand are addressed in detail in the respective master plans. • The MSDF is not informed by current availability of budget or funding support. Not all aspects of the MSDF are controlled by government as much of the land is in private ownership. Where policies or objectives do fall within the government mandate, such initiatives must be addressed in an implementation action plan and grafted into the IDP in order to secure budget as part of the implementation of the MSDF. • The scale of the municipal area makes it impractical to render maps in high resolution. All maps are available separately and in .shape format and can be provided when needed.
27	<p>Lack of incorporating of focus group proposals</p> <p>Incorrect municipal land audit. Vacant land audit should not be used to restrict development. Audit should only include available serviced land</p> <p>Deviation from 2013 SDF in respect of</p>	Valley Containers no.48 (5 December 2018)	<ul style="list-style-type: none"> • Refer to line 46 for response to integration of focus group inputs. • The vacant land audit has been updated and includes vacant and under-utilised land. The parcels may be zoned and serviced already, and others are not. The detailed vacant land audit report contains details of every land parcel as well as an assessment of the obvious development constraints applicable to each. Addition of more land for development over the short term is not fiscally justifiable as financial commitment in respect of infrastructure and services in the urban area has already been made and these services need to be optimised thereby containing cost on maintenance over the long term.

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<p>development of eastern node and Destiny Africa</p> <p>Addressing access roads and future road networks in Sawmill and Welgelegen</p> <p>Exclusion of areas from proposed urban edge</p> <p>Sustainable Settlements CBD and Garden Route Mall</p> <p>Rural Landscapes</p> <p>Exclusion of Municipal Open Space Network</p> <p>Inclusion of CBA and ESA mapping (No ground truth)</p>		<ul style="list-style-type: none"> • There is no deviation from the 2013 MSDF in respect of the intent to strengthen and optimise the eastern node. The urban edge has remained the same with the exception of the urban edge around the proposed Destiny Africa site which is now fixed. The strategic outcome of inclusion of the Destiny Africa site is addressed in detail in the MSDF. • Further expansion of the Kraaibosch area remains a long term objective as was defined in the 2013 MSDF. Roads infrastructure was installed by the developer as this was required. The southern by-pass is a link road between the R102 and the N2 and is intended to run through the Hans Moes Kraal area, across the Schaapkop River and south of Thembaletu. It is most definitely not built yet and the MSDF encourages that based on feasibility the construction of this road be taken into review. • Existing land uses on the periphery is not part of the criteria for delineation of the urban edge. The urban edge is a growth management tool and seeks to improve short term fiscal sustainability and induces spatial transformation. Any proposed development outside the urban edge that meets the strategic objectives of the MSDF may be considered on site specific circumstances. The urban edge is not a prohibitor to development. The 2013 MSDF, supported by the draft local spatial development framework was clear that the Kraaibosch area is envisaged for tourism development and development that will enforce rural urban linkages. The peri-urban nature of this area is still supported. • There are several undeveloped school premises throughout the existing urban area and at least 4 premises suitable for development of a hospital. Development of these social amenities is not a municipal mandate. • The vitality and economic viability of each of the nodes must be preserved by ensuring the trade offered in each are complimentary. The distance between the nodes are small and the MSDF supports improved connectivity between the nodes through strengthening the corridors that link them. Intensification around nodes and restructuring areas in the CBD area are promoted to provide for residential opportunities closer to the CBD. Where employment is not within proximity to residential areas, access to employment is supported by the availability of the public transport system. • There are no exceptions to protection of environmental assets in urban areas. The preservation of environmental corridors, ecosystems and water catchment areas supports the drive to maintain good quality water sources and supports
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			<p>water security. The municipality needs to be proactive in preserving the environmental quality of the area which is the primary natural resource that attracts tourist to the area and responds to the warnings that the region will become increasingly arid over the next 30 years. The context of the Kraaibosch east area is no different from that envisaged in the 2013 MSDF and currently serves as a transition into the urban area.</p> <ul style="list-style-type: none"> • Integrated open spaces systems are upheld as was also endorsed in the 2013 MSDF. • It is required that the MSDF aligns with national and provincial policy of which the biodiversity framework is one. Land development decisions must be informed by environmental considerations and the CBA mapping serves as a baseline for identification of potential sensitivities. Shape files of all maps are available and can be obtained from the municipality.
B PUBLIC AREA- BASED COMMENTS RECEIVED AND MUNICIPAL RESPONSES			
	PUBLIC COMMENTS RECEIVED	STAKEHOLDER / OBJECTOR	RESPONSE
28	Geelhoutboom workers area to be included as a rural node	A Buitendach No. 57 (5 December 2018)	Geelhoutboom is identified in the MSDF as a significant agricultural cluster with service uses. The MSDF contains clear guidelines for rural development or development in rural areas. The applicant must prove the case for Geelhoutboom in terms of these guidelines in a formal application. Key considerations to take into account are the contribution of the proposed node to the rural economy and the distance from George. It is doubtful whether the area will qualify in terms of its distance from George.
29	Sinksabrug: The objection is against the classification of Sinksabrug as a rural agricultural cluster in Table 10. It is argued that Sinksabrug should be classified as a hamlet in Table 7. It is further	H Rawlings No.17 & 76 (30 November 2018 & 12 December 2018), Victor & Partners No 37 (4 December 2018)	Table 7 refers to existing hamlets with a residential component while Table 10 refers to clusters of existing service uses. By that description Sinksabrug fits into Table 10 as a cluster. It is not clear where the residential component of Sinksabrug is which the objectors refers to. For the purpose of the classification existing land use only is taken into account and not proposed uses. The point of departure in the MSDF is that it does not pre-empt development which developers endeavour to motivate as 'good' development proposals. It is not the purpose of the MSDF to include all such proposals before formal applications are made, purely because it appears to be a 'good' proposal, but its purpose is rather to provide the vision for

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	argued that Sinksabrug should be indicated as a rural node because of several advantages that are mentioned, among which the benefit of development to the local people in the rural area is one.		<p>the development of the municipal area as a whole, a strategic framework and guidelines within which a proposed development can be motivated. In such a way all decision makers and stakeholders will be able to scrutinise the applications once it is made during the formal process of the application. Insufficient clarity exists in Sinksaburg proposals to date that gives the MSDF comfort that this is a desirable development.</p> <p>The MSDF contains a clear guideline for urban sprawl or leapfrog development in Annexure 3. The applicant must prove the case for Sinksabrug in terms of these guidelines in a formal application. The land development decision is taken in terms of the provisions of the Spatial Planning Land Use Management Act and as the MSDF does not grant rights, every application regardless of the classification of the land in the MSDF, must meet the norms and standards of SPLUMA and comply with the principles therein. The Tribunal needs to be assured also that the proposal adequately meets the strategic objectives stated in policy of all spheres of government. The MSDF provides detailed guidance on how these criteria should be addressed in a land development application.</p>
30	Lagoon Bay: a case is motivated for a communal farming project with 200 new small holdings and a workers' agri-village of about 70 units. It is furthermore proposed that Policy E be expanded to further include a statement on the need for the re-capitalization of lost production due to changed economic and climatic conditions.	D Lombard No. 13 (28 November 2018)	<p>See line nr 29 above for the point of departure in the MSDF. This proposal comprises of a development of significant scale that may have impact (whether positive or negative) in many areas of government as well as the socio-economic environment. It would require the comments and inputs from several stakeholders and government departments. The MSDF cannot pre-empt the outcome of such formal process that will entail both an environmental and a LUPA process as well as consideration of competing proposals for agri-villages in close proximity. This proposal deviates from the Municipality's vision for the municipal area – which the MSDF articulates. The Western Cape's Rural Development Guidelines and Annexure 3 provide the framework for consideration of this proposal going forward. Re-capitalisation of lost production does not necessarily require land use change. Lost production can also relate to speculative activities on land not only economic and climate change.</p> <p>Policy E, however, can be adjusted to accommodate the proposed addition.</p>
31	Herolds Bay urban edge in respect of Farm Buffelsfontein 204/7.	D Nel No. 86 (5 March 2018)	<p>As explained above in no 5 the due legal processes cannot be pre-empted by including the proposal in the urban edge in advance. An application has to be made that will contain the details and site-specific aspects of the proposals that can be</p>

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	Motivation is that the land parcel connects existing urban development on both sides and that its inclusion on the urban edge would form a logical extension of the urban edge to include it as a residential urban area with a small node that would be of benefit to the community.		assessed if they meet the needs of Herolds Bay and the environmental requirements and must demonstrate that the stated objectives of the MSDP as well as other policy is endorsed through the development in order to justify the expansion of the urban boundaries. The MSDP however, in Annexure 2 (i) contains guidelines for the management of growth in Herolds Bay. A new development proposal should be based on these guidelines and motivated accordingly.
32	Herolds Bay urban edge i.r.o Farm 331, motivated as an infill portion of land between adjacent urban areas	Denneseerus (MSB Neser) No. 39 (4 December 2018)	See above. The locality factors may be optimal; however, all development proposal must meet a range of criteria measured against the legislative requirements of the Spatial Planning Land Use Management Act. Once the proposal is subjected to the legal application processes and all cumulative impacts have been measured, a decision can be cast on the desirability of the development. The guidelines in Annexure 2 also apply to this site.
33	Wilderness urban edge: A small adjustment of the urban edge is proposed to include the narrow portion of $\pm 4700\text{m}^2$ of erf 1262 within the urban edge. A NEMA process is in process and it was determined that the remaining larger portion of the erf be zoned as Nature Conservation area. The inclusion and	M de Bruyn no. 51 (5 December 2018)	The urban edge can be adjusted in this case as it is considered a minor correction.

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	rezoning will allow for two dwellings.		
34	<p>Oppose Restructuring Zones on Council land next to Kingswood Estate. It is argued that although RZ's are necessary, the locational factors are not favourable in this particular location. It is located outside the CBD, outside the development corridors and outside the 500m intensification zones. Council must consider other options such as land swaps with owners in the CBD to achieve the aim of high densities in the CBD and relatively low densities on these sites, as well as other balanced strategies. No indication is given how the council will implement housing on these sites.</p>	<p>Urban Dynamics on behalf of Kingswood No. 58, (05 December 2018) G Swart No.9 (19 November 2018), G Wilkins No.35 (4 December 2018), J van der Merwe No.6 (5 November 2018), J de Villiers Village Ridge petition 66 (5 December 2018) (Content of petition addressed in assessment of relevant land development application)</p>	<p>In terms of the broader demand for high density affordable housing in George and lack of large enough sites to achieve economic, affordable development, the sites are suitable for social or medium density gap housing development. In the context of the George central area the distance from the CBD is not that critical and addressed by the GoGeorge system. The aim is to diversify and achieve mixed development as is admitted by the respondents. The principle of spatial justice cannot be altered to suit the views and desires of adjacent residential areas. The sites should remain in the MSDF as restructuring zones and the planning process with public participation will be followed.</p> <p>The availability of the sports fields is however an asset to the community that could be considered in further planning of the area for restructuring as it will benefit new residents too. The value of the wetland area is also regarded in the MSDF for its contributions to water security and good quality water sources and must be taken into consideration in the layout and design of any future development of this site.</p>
35	<p>Urban edge south of Welgelegen, north of the N2 interchange i.r.o erven 25541, 25537, 25538, 25537, Kraaibosch: it is argued that the site has several</p>	<p>Planning Partners on behalf of Magnolia Ridge Properties No.21 (3 December 2018)</p>	<p>It is understood that the matter of the alleged Service Agreement is <i>sub judice</i> at the moment and is not responded to here.</p> <p>The fact that any site has features or characteristics that makes it compliant to urban edge requirements, alone does not qualify it for inclusion in the urban edge. There are other factors that need to be considered as well, e.g. the broader objectives of the MSDF and the long-term fiscal impact that is explained in the MSDF. The site is not considered a direction for urban expansion in the short to</p>

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	<p>features that qualifies it as a logical expansion of the urban edge. Each of the features are discussed. No proposals for specific land uses are made or motivated as reasons for the proposed expansion.</p>		<p>medium term because of the fiscal impact and the environmental quality of this gateway to George. The short-term expansion areas, which may be included in the urban edge should promote efforts to achieve spatial transformation along with other factors outlined in national policy. The expansion of the urban edge in this direction in particular is considered to detract from the objectives of the MSDF and there is not convincing evidence regarding its potential in achieving the SPLUMA principles of social justice, etc. over the short term.</p> <p>Over and above the said factors, its inclusion cannot be considered without a specific land use proposal. This was the stance taken with the previous land use application where the proposed land uses posed a direct threat to the vitality and sustainability of existing nodes. Expansion across this area at this stage is anticipated to put pressure on development of other properties towards Victoria Bay with the same arguments to justify a deviation from the MSDF and poses a direct threat to the current sense of place prevailing in this precinct, which has a distinct peri-urban character and holds much potential for development of tourist amenities. The spatial budget in the MSDF demonstrates sufficient supply of land for residential growth and commercial expansion for the next 5 years. The position could be revisited over 5 years if the take up of the land is considered and more information is available on residential densification and inclusionary housing.</p> <p>The area concerned does however, lend itself to land uses that are strategic or catalytic in nature taking into account its relationship and impact in respect of other existing nodes and keeping in character with its context. Recreational facilities and tourist-related uses compatible with the interface with the rural environment are supported in MSDF policy.</p>
36	<p>Oppose any change in the usage of the Riding club land. The existing use is a unique and scarce asset.</p>	<p>A Joubert No. 62 (5 December 2018), C Botha No.3 (4 December 2018), D Bruwer No.30 (4 December 2018), G Gouws No. 72 (5 December 2018), K de Kock No. 4 (04 November 2018), L de Meyer No. 67 (5 December 2018), L Kelland No. 31 (4 December 2018), L Kotze No. 54 (5 December 2018), L Murray No.20 (3 December 2018), M Pelser No. 34 (4 December 2018),</p>	<p>The objective of the MSDF is a more compact town with optimal utilization of the land inside the urban edge. The riding club is an extensive agricultural land use, highly under-utilised on scarce, valuable urban soil. The gross under-utilisation of land of this nature obstructs the optimal use of infrastructure, resulting in land having to be added to the urban fabric to meet urbanization demands, at great expense to the state, developer and the rate payer. Its proximity to an existing mall offering employment renders it highly suitable for intensification. It is inevitable that the land will have to be utilised in the future for land uses in keeping with the objectives of the MSDF and national policy. The value that the riding club contributes to the city is not disregarded, however the land use is agriculture in</p>

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		M Mitchell No. 65 (05 December 2018), O Bredenkamp No. 69 (5 December 2018) R Heiberg No. 52 (3 December 2018), S Brand No. 23 (3 December 2018), S Branford No 53 (5 December 2018). T de Witt No. 5 (5 November 2018), Glenwood Cons Assoc No.61 (5 December 2018), R Lauwrens No. 83 (5 December 2018)	nature and another site more suitable to the land use must be utilised. Any proposals will have to go through the prescribed processes which include public participation.
37	Wilderness parking and main roads	G Sell No. 11 (26 October 2018), C Hall No. 7 (8 November 2018),	These issues should be addressed in a revised Wilderness LSDF
38	Preserve motor club site	J Belgrove No.2 (22 October 2018)	The MSDF does not take away their present rights. Its future will be determined as detailed planning commences.
39	Oakhurst development in York street	J Scholtz No. 46 (5 December 2018)	Proposals can be accommodated within the vision for the CBD.
40	Retain school site at Genevafontein	J van der Merwe No.6 (5 November 2018)	The school site is one of the restructuring sites that is earmarked for residential development should the site or part thereof not be required by the Department of Education for development of a new school. Its future use will be subjected to a public participation process.
41	Question the viability of small scale farming at Sandkraal	J van der Merwe No.6 (5 November 2018)	This not an issue that will impact on the objectives of the MSDF and government assistance will determine the practicality of the farming project as state funded projects are generally subjected to a feasibility assessment. Water availability is impacted on by the pollution of watercourses running through the George city area and solutions must be sought to overcome this challenge. Opportunity for small scale farming is an important response to food security in the context of persistent poverty and climate change impacts.
42	Include Portion 85 Hans moes kraal in the urban edge to solve the problem of the 21 families without housing on the site	J Oosthuizen No.16 (29 November 2018)	The inclusion will be contrary to the policy of a tight urban edge. It will not solve the present problem due to funding and lack of services to the site. It is social problem that needs to be solved in the council's housing settlement planning.
43	Include erven 799 and 1496, Uniondale in the urban edge.	M Isaacs No. 1 (24 October 2018)	It is state owned land and should be addressed in the LSDF when revised.

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44	Development, or not, of the Kleinkrantz resort	S Sell No. 78 (30 October 2018)	It is an issue that needs detailed planning and public input and should be addressed in the revision of the LSDF for Wilderness. The land is however not controlled by the municipality and the development thereof must occur at the initiative of the land owner. The important principle promoted by the MSDF is that land that enables affordable public access to the coast as an economic resource and amenity should be protected in perpetuity in light of the increasing privatisation of the coastline.
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C DETAILED PUBLIC AND PUBLIC SECTOR COMMENTS RECEIVED AND MUNICIPAL RESPONSES			
STAKEHOLDER		PUBLIC COMMENTS RECEIVED	MSDF RESPONSE
45	H J Hill No. 27 (October 2018)	<p>1 General comment on abovementioned spatial drivers: I fail to see why the significant driver of the natural environment has been neglected in the proposed George SDF. The green environment of the city is not only why people reside here but also what sells the city. The short-sighted demarcation of the urban edge(s) actually cancels the second driver of the notion of corridors and nodes and the proposals made fail to deliver on the creation of opportunities which such corridors and nodes can create.</p> <p>An absent spatial driver in the proposed amendment is the issue of heritage. The authority has lacked the willpower to give effect to national directives of protecting the build environment of a historic town. There can be no proposals with regard to urban design issues and other relevant matters without embracing heritage. The document has failed to address this in the wider context.</p> <p>2 Par 4.3: another flag, of critical importance, that needs to be identified is the issue of lack of spending the capital budget. The non / underspending annually results in a haphazard spending outside of priorities and giving effect to strategies. This affects service delivery.</p> <p>3 Map 11: fails to identify a city wide green space network. The plan, as presented, is of no value to deliver on one of the drivers as identified in par 4.2. We realise that this is a small scale issue but wider plan still needs to be identified.</p>	<p>This point is not understood. The environment is the first spatial driver identified.</p> <p>Do not agree. The conservative demarcation of the urban edge is to promote infill and densification and the nodes and corridors where this should be specifically promoted are identified.</p> <p>Do not agree. Clear policy statements are made to ensure protection of built environment heritage and cultural landscape heritage.</p> <p>While an important point, this is not a spatial planning issue.</p> <p>While the MSDF conceptually identifies this, more detailed work is needed. This is identified as a priority implementation action item in the revised MSDF.</p>

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		<p>4 Policy F2 (b)(c): disagree with statements / proposals. Both the Blanco / Airport connection as well as the George Airport road overs major opportunities with the emphasis on tourism. The proposed policy statements are short sighted. The proposed western bypass should be scrapped in total. The impact on the area between the strawberry farm surrounds and Outeniqua Pass will be dramatic. The existing corridor could / should be redeveloped with a clear sense of place which will add value to George as a destination.</p> <p>5 Policy G: the policy proposals lack the essence of urban design and public spaces. The implementation thereof is doubted.</p> <p>6 Policy G2(e): legitimisation of backyard housing will result in extensive overloading of infrastructure that has not been planned / provided for. This should not be encouraged but instead low cost denser housing development should rather be implemented – this includes alternative housing methods presently not recognised / encouraged by structure of government. The principle of densification in existing more affluent areas should be recognised to add to the rental stock.</p> <p>7 Policy G2(g): this does not support the rich heritage of George.</p> <p>8 Policy G2(f): this proposal should not even be considered as an option. Schools generally are exposed to social dangers and scholars are not sufficiently protected. The proposal will open opportunities which will exploit scholars. Most schools already lack space to incorporate proper and decent sport facilities. To ‘highjack’ the school site / space for housing accommodation not acceptable. Scrap proposal as per figure 27.</p> <p>9 Policy H: to include two paragraphs on such an important topic in the SDF are appalling and a shame.</p>	<p>Opportunities along the George airport road and in the airport service precinct have been identified in the revised MSDF informed by the George Airport Corridor LSDF</p> <p>The policy proposals generally reflect best practice. The proposal for infill and densification along Knysna Road/ Courtenay Street have been withdrawn.</p> <p>The need for alternative housing methods is supported in principle. However, backyard housing exists, will continue to occur (it is a source of income for poorer households and is a source of housing supply and is an as of right in the Zoning By-law) and should thus be integrated into infrastructure planning.</p> <p>Agreed.</p> <p>Over-specified road widths dominated by traffic and parking detract from the rich heritage of George.</p> <p>The MSDF proposal is not understood. In some cases land allocated to schools is over specified and schools cannot afford to maintain all of their land nor develop it with facilities. They tend then to fence off what they can secure and maintain and leave the remainder of the land outside of the school. This land is left to waste and can become a liability for the school and the surrounding community, presenting safety risks. Well-designed infill development can enhance the safety and surveillance over the school.</p> <p>Heritage must be dealt with at different scales and not all heritage concerns can be dealt with at a MSDF scale.</p> <p>This point is not clear. The demarcation of the edge is aligned to the vision set out in the MSDF.</p>
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		<p>10 Maps 30 – 33 (41 – 44): demarcation of urban edges shows lack of long term vision.</p> <p>11 Par 5.2.5.1: <i>resisting dispersed businesses</i> lacks vision to open economy without compromising city structure. Residential development in CBD and along major routes should be encouraged. Not sure how ‘high quality urban design’ will reduce crime??</p> <p>12 Par 6.2: “<i>Once there is certainty that the development is proceeding, the urban edge will be amended to include the Destiny Africa’s development footprint</i>”. The comments / statement made are worrying since a clear impression is given that a development proposal ‘determines’ the urban edge whilst amendment of ‘obvious’ urban growth opportunities are excluded.</p> <p>13 General: The area east of the airport / Blanco link and north of the N2 should be earmarked as a natural extension of George. There are no significant agricultural activities that will be sacrificed. Both these roads are ‘hard’ and distinct boundaries (map 40)</p> <p>17 Par (2.3.1) – George vision inter alia clean, green safe environment: Little signs of clean city – just observe from N2 and less fortunate income areas. Applaud street cleaners in CBD. Massive opportunities to create jobs by cleaning areas – part of EPWP?</p> <p>18 Policy A4(iv): Municipality should actively promote and support this important notion. Unfortunately, Hillbillies MTB Club and the trail run fraternity has taken lead to develop and maintain trails for recreation purposes with no support from municipality. Develop joint ventures?</p> <p>19 Policy A4(vi): Not only Skaapkop River Corridor to be protected.</p> <p>20 Policy A4(ii): None of the river corridors running through town is accessible to strengthen the green structure. There is nothing with regards to keeping this system clean and free from aliens. Alien vegetation in river corridors flared</p>	<p>The location of businesses in concentration has a direct impact on city structure. Working from home is governed by the zoning scheme and is not opposed to in the MSDF. The MSDF does this.</p> <p>Environmental design for safer communities is a commonly understood approach in the built environment field; for example, high quality urban design improves safety through increasing passive surveillance over public spaces.</p> <p>The ‘Destiny Africa’ site is referred to as such for ease of understanding. The development of this site is supported for structural reasons. The commentator does not identify what he understands to be “obvious” growth opportunities.</p> <p>This is an area of high agricultural value and this is confirmed by the commentator himself in his first comment.</p> <p>This is not relevant to a MSDF</p> <p>Good implementation suggestion, thank you.</p> <p>Noted, thank you. The MSDF has been revised to ensure appropriate emphasis of important river corridors and these policy areas have been strengthened. The management of alien vegetation is a key concern and an important fire risk mitigation action. This is not a spatial planning policy matter however but is promoted in the MSDF through a specific policy and supporting policy guidelines.</p>
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		<p>and fumes the recent fires in and around George. Presently no will from any authority to take the lead in this regard. Residential properties along river corridors presently encroach on river system and 'close' rivers from future public use.</p> <p>21 Policy C3(d): Municipality cannot resist gated developments initiated by private developers. Greater Kraaibosch area illustrates this.</p> <p>22 Policy D(2): Few residential properties along coast does not encroach on public land, therefore private coastal / river owners claim large portions of public land as their own with no access thereto since it (the encroachment) is made part of private land. Municipality has failed to address this.</p> <p>23 Policy D(7): The installation of i.e water tanks to ensure additional household capacity and to lessen demand on municipal resources should be made compulsory. All new developments should incorporate from day one. The remainder of George should be phased in over, say 5 years.</p> <p>24 Policy F2(a)(ii): <i>"The Hans moes kraal coastal properties have been identified as presenting an economic opportunity. The intention is to attract developments that, due to its scale and uniqueness will not "fit" into any other area of George..."</i> This policy statement is contrary to and in conflict with the general principle of limiting urban growth. The statement that development here will be acceptable if such development does not "fit" with any other area cannot be understood. The present Le Grange residential estate / development actually makes a mockery of this policy statement.</p> <p>25 Policy 4.3.3: If 10 principles of smart growth can materialise within broader SDF then it would certainly make huge positive contribution.</p> <p>26 Policy G1: Supported. The SDF should, in essence, support mix land use, densification and corridor development to enhance / promote / support walkable environments. The</p>	<p>Noted. All developments require development planning permission from the Municipality and such permissions must be informed by the MSDF and other policies of the Municipality. This is a key concern. The MSDF formalises the coastal management line and identifies the need for a coastal protection overlay zone as a follow-on implementation action. This is however also an enforcement need. The coastal management policy statements have been revised.</p> <p>This is not a municipal wide spatial planning matter. However, it has been included as a policy guideline associated with sustainable resource use.</p> <p>Noted</p> <p>Agreed. The importance of urban design guidelines is supported and has been incorporated.</p>
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		<p>“zoning scheme” should be amended accordingly. The ‘zero parking requirement’ approach should be considered with caution. This should be supported by strong urban design guidelines. The historical district six prime example of what can be achieved (sadly lost for eternity due to short sighted officials).</p> <p>27 Par 5.1: The relevant LSDF’s should be amended to embrace new vision / comments to ensure implementation.</p> <p>28 Par 5.1.1: The new SDF should be incorporated into revised IDP in order to replace outdated priorities and fiscal spending.</p> <p>29 Par 5.1.2.1: Revision of transport plan should be done as matter of urgency to give effect to SDF. The GoGeorge initiative should be extended to include / support the future spatial fabric.</p> <p>30 General: Sadly, the MSDF does not include / promote alternative energy. The issue of recycling (should be compulsory) also lacks in spite of one of the vision’s been a clean and green city. Major economic opportunities can be unlocked together with large numbers of jobs created within sector.</p>	<p>Yes, this will be done and is identified as an implementation action.</p> <p>Agreed this is done as a matter of course</p> <p>The revision/ update of the Transport Plan is supported and there are plans to do this in the 2019/20 financial year.</p> <p>This is not a spatial planning matter, but recycling is supported to reduce the demand for land for landfill. This is now included as a policy guideline associated with sustainable resource use.</p>
46	Professional Town Planners, Southern Cape: GENERAL COMMENTS No. 44 (5 December 2018)	Intermittent functionality of the Municipality’s website during the public participation process suggesting that this is a procedural flaw in terms of the Promotion of Administrative Justice Act and the public comment period will be extended	The advert included contact email addresses in order to access the draft document. Alternative links to the document were provided to all who wrote to these addresses. Public comment was accepted for 2 weeks following the closing date for public comment. Hard copies of the document was available at all municipal offices and public libraries for the duration of the public participation process.
		The MSDF was developed without credible heritage information – this is in conflict with the National Heritage Resources Act. The MSDF is therefore not compliant with national legislation.	<p>The Western Cape Department of Environmental Affairs and Development Planning advises as follows:</p> <p>Section 30(5) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), states that whenever a planning authority</p>

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	<p>Pg 24 No sectoral plan including an accurate list of intangible and tangible heritage is contrary to legislative requirements and irresponsible within the current socio-political context of South Africa</p> <p>Also refer to comment relating to pages 32, 33, 44, 45, 52, 62, 83, 99, 106, 119, 120, 121, 148 of the draft George SDF, and Map 27 - This map is inaccurate in its current form.</p>	<p>compiles or revises their planning scheme or a spatial development plan, the planning authority shall <u>compile an inventory of all the heritage resources which falls within its area</u> of jurisdiction and submit such inventory to the relevant provincial heritage authority (which in this case is Heritage Western Cape).</p> <p>It is noted and accepted that this is indeed a requirement of NHRA, however neither SPLUMA, LUPA nor the MSA explicitly have heritage requirements of Spatial Development Frameworks. A careful reading of section 30 of the NHRA can be interpreted as meaning that the heritage inventory should be compiled while the SDF or zoning scheme is compiled and in fact this section doesn't explicitly state it should form a part of the SDF itself.</p> <p>Given the above, it is our interpretation that whilst the municipality may not be in compliance with section 30(5) of the NHRA, this does not imply that the SDF is not in compliance with the relevant planning legislation in terms of which it is approved. The council can therefore, once it complies with the procedural and content requirements of SPLUMA, LUPA, the MSA and its planning bylaw, approve the George SDF as a core component of its Integrated Development Plan in terms of the relevant planning legislation.</p> <p>Therefore, regardless of the status of the heritage inventory and the compliance with the abovementioned heritage requirements as set out in the NHRA, it is indeed possible that the George Municipality can approve a Spatial Development Framework that is compliant with planning legislation.</p> <p>It is also noted that the Municipality actively engaged with the heritage practitioner community to assist with ensuring the SDF adequately reflected the heritage assets in the George Municipal Area. A workshop was held and the practitioners were invited to provide direct specialist input into the MSDF draft. Nothing was received. This community was also provided with a preview of the heritage mapping done in preparation of the MSDF and invited to comment on this. Nothing was received.</p>
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			<p>The MSDF at a policy level emphasises the importance of the municipality's heritage assets and resources and the need to protect and respect these. The proposals seek to improve the recognition of these assets within a balanced and integrated approach to the built environment. There is legislation in place to ensure that this policy intent is carried through in implementation actions. There is no need for the MSDF to repeat these. Unfortunately, the comment does not specifically point to where the MSDF might compromise the heritage assets of the municipality. The update of the heritage resource inventory is identified as one of the priorities for further implementation and is duly reflected in the implementation plan.</p> <p>Guidance provided in the MSDF for Priority Investment Areas is carried over from the 2013 George SDF. The absence of detailed heritage studies does not preclude the MSDF from identifying key known heritage informants.</p>
		<p>Spatial and Policy proposals developed in the draft George MSDF may not be implementable. They do not consider statutory heritage related procedures and processes entrenched in national legislation and directly impact on the effective implementation of the aims of the draft GSDF.</p>	<p>The MSDF is a policy document aimed to give guidance to the direction and nature of future development and investment in George. It works alongside legislation governing the built environment. It is unnecessary for the MSDF to repeat all of the legislation governing the detailed consideration of individual development applications. It is assumed that in the implementation of the MSDF individual projects will comply with all legislated procedures and prescripts. No proposals made in the George MSDF conflict with the heritage assets of George but seek to achieve a balance in the interests of sustainable and inclusive development.</p>
		<p>The GSDF contains very broad policies and statements, the implementation of which extends well beyond 5 years validity period. The outlining of long term spatial goals should be clearly outlined as of a long term nature.</p>	<p>Noted.</p>
		<p>Proposals made in the Focus Group Workshop were not included</p>	<p>The commentators aren't clear as to what proposals were made that have not been included. The workshop debated issues rather</p>

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			than made proposals. The draft MSDF follows what was understood to be the general conclusions of this workshop.
		<p>There seems to be no balance between development proposals and what the free market requires. The overall policy of densification and integration is supported but is forced on all remaining vacant land. There must be a balance in the housing market – only the Kraaibosch North area is inside the urban edge. With current development trends and demand this area will be built up within the next ten years</p> <p>Medium term expansion area for the growth of these type of developments should be indicated – they are critical contributors to municipal income.</p>	<p>There is extensive vacant and under-utilised land within the urban edge, not only in Kraaibosch North. Extensive gated estates compromise the legibility, accessibility and efficiency of the urban system and should not be promoted over large tracts of land. The MSDF is reviewable every 5 years at which point the fiscal implications of development and growth trends will be re-evaluated along with the necessity and feasibility of expanding the urban footprint will again be considered. At present there are extensive tracts of land that can absorb growth and contribute to a more sustainable form.</p> <p>The medium-term growth direction has been identified in the MSDF.</p>
		<p>The proposals for densification and social housing along York Street and Knysna Road will detrimentally affect property values and affect businesses. The sense of place will be lost. The heritage significant of the cultural landscapes in the public realm are ignored and proposals will likely be refused in terms of heritage legislation. These proposals are not practical nor cost effective and will create a bigger burden for the municipality within a short time period. High density development is the only form of development proposed in the Draft GSDF.</p>	<p>Case studies in areas where infill development has been applied suggest that well designed development (including social housing development) can enhance property values. Increased footfall will certainly improve business viability and thereby business property values. The sense of place along York Road is presently severely compromised by the poor quality of architecture of buildings along it as well as extensive parking lots. There is extensive evidence to suggest that new development can enhance the quality of sense of place and improve reference to and respect for heritage. Most existing buildings along both of these roads make little to no reference to heritage and diminish the sense of place. Protecting heritage does not equate to no development at all costs. In the context of the transformation of our society and the growth of the economy needed – heritage must be seen as an informant to design and planning but not a block to any development and especially inclusive development.</p> <p>The draft George MSDF proposed varying densities across different parts of George and identifies priority areas for focussing densities. The suggestion that high density development is the only form of development proposed is not correct.</p>

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			<p>The proposals for infill along the road reserve of Knysna Road have been removed in recognition of the green function of this route and the infrastructure lying under the ground in this reserve. The inclusive development of public land along this corridor however remains a priority. Enabling people to live closer to opportunities in George is an important development outcome for the municipality in terms of efficiencies and households.</p>
		<p>The proclaimed Western Bypass is shown only partially. The proposed Southern Arterial Road is not indicated. These are important spatial informants and open up new areas for development. These routes are fixed and must be indicated. These are part of longer term informants that cannot be thrown out. It ensures mobility for George.</p>	<p>The Western Bypass has been corrected on relevant maps. However, the purpose of the Western Bypass is to improve regional mobility and remove freight traffic from the York Road/ George CBD etc. It is not intended to open up land for development that is of agricultural significance and should be preserved as such.</p> <p>Much work and research are required to affirm the anticipated benefits and ability of the proposed Southern Arterial to yield strategic restructuring outcomes in a fiscally sustainable manner. While identified as a long-term road connection, less focus is placed on this arterial as it cannot be affirmed to endorse the short to medium term outcomes envisaged in this MSDF. The extent and expense are presently not justified in the context of the local, regional and national investment needs. Focus on this arterial will also detract from more important, localised network connections that are needed to improve accessibility and alternative access and egress from areas to the south of the N2. Currently the N2 performs an adequate east – west mobility function. Diverting traffic onto this arterial will divert economic opportunity from settlements in need of this. Greater use of public transport will reduce traffic and allow key routes to play a mobility and accessibility role feeding onto the N2.</p> <p>The Southern Arterial is not intended to open up land for development either. To the extent that Hansmoeskraal is a long term development ideal, the need for an additional mobility route and the ability of this development to pay for it can be considered in subsequent MSDF reviews.</p>

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		<p>The new Airport Support Zone is not indicated – the broader proposal in the Gwayang LSDF should be demarcated in the GSDF.</p> <p>No indication is made for ‘special developments’ where a large commercial/ institutional development could have a very positive impact on the region but are held back by being outside the urban edge or are not in a certain node. These developments could then only be justified by site specific circumstances, this however seems to be impossible.</p> <p>Most of the spatial proposals were written to justify the very expensive GoGeorge bus transport. Developments are now forced to these bus routes at the expense of existing rights and values. It should have been the other way around with past SDFs to encourage and incentivise developers and gradually increase the densities along transport corridors to justify public transport. Development should not be forced but facilitated.</p> <p>The system is underutilised in the CBD and industrial areas. Illegal minibus taxi operations along these routes are impacting on their viability.</p> <p>The next phase of the GoGeorge network need to be rolled out. This will strengthen the system. Inappropriate and forced densification cannot replace the need to roll out the following phases which are long overdue.</p>	<p>Agreed. The MSDF has been amended to include the Airport Support Area.</p> <p>This would defeat the purpose of an MSDF which is to give direction to investment in the region and the city area. Much positive downstream potential impact would be lost if such developments are isolated from the urban systems. The MSDF is a policy to guide decision-making but the decision-makers will need to apply their minds to each decision. Such proposals would need to be considered in terms of the criteria set out in Annexure 5 to ensure a holistic decision and sustained positive impact. The SDF can then be amended if site specific circumstances are not present. The Hansmoeskraal precinct is currently understood to be the focus of directing possible special development as could be the development opportunity at the George Dam but the lost opportunity to local people of the remote location of these developments must be carefully considered.</p> <p>The MSDF does not take away or give rights. The suggestions that the direction given by the MSDF is at the expense of existing rights is incorrect. The majority of residents of George do not have a car and are reliant either on non-motorised transport or public transport to move around the city. The investment in a high quality public transport system for George is a pro-poor, equitable initiative that also has environmental sustainability benefits, reducing George’s carbon footprint. High quality public transport is also good for business. The proposals made in the MSDF aim to improve the viability and efficiency of the public transport network and system and reduce its cost on the taxpayer. This MSDF is an update to the previous MSDF, the densities proposed in the locations proposed at the same as the 2013 George SDF. The past SDF therefore did encourage increasing density along transport corridors and this MSDF amendment is reinforcing this. The MSDF recommends incentives to promote development at appropriate densities in desired locations. The MSDF is a guidance and facilitation tool it is not a zoning scheme. The MSDF presents a spatial rationale that support the consolidation and optimization</p>
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			<p>of government investment. To this end the investments made by government in developing the public transport network is supported by prioritization of development along these routes. The proclamation of restructuring zones along York Street and in the CBD is a direct result of this initiative and facilitates development of affordable residential opportunities. On the back of the strategies outlined in the MSDF the municipality continues to seek funding support to incentivise and facilitate development in the prioritised areas.</p> <p>The MSDF is promoting development to enhance public transport use to and from the CBD and industrial areas and aims to leverage the benefits of this asset to improved equitable access to employment and amenities toward improvement of the lives of the majority the citizens of the city.</p> <p>Densification policies contained in the MSDF consider the entire public transport network not only current operational routes. Land use that supports public transport and the roll out of public transport services are separate matters, but improved land use will improve the viability of routes and the roll out of services along them.</p>
		Incentives for re-development in the CBD should be revised to be realistic and practical. The right input and support must be brought in for the LED section in the Municipality	<p>Noted. Regrettably, no mention is made of what incentives are impractical or would be more practical. The shortfalls of the current incentives policy are however, recognised by the municipality and the improvement thereof is an aspect that will be executed as an implementation action.</p>
	Professional Town Planners No. 44, Southern Cape : PAGE SPECIFIC COMMENTS	<p>The spike in population growth in the last 12-18 months is not visible in the draft GSDF. The number of building plans have almost doubled. There has been substantial growth in Thembaletu.</p> <p>Pg 43 – The town has been experiencing substantial increased economic investment and growth. ‘The population continues to grow, albeit at a slower rate’. This is simply not accurate.</p>	<p>The MSDF can only use official population and population projection data; namely, the Census 2011 and Community Survey 2016 data.</p> <p>The spike in building plans is more likely attributable to the amnesty periods offered by the Municipality in this time period to regularise buildings.</p> <p>No alternative official data source is offered by the commentators to support their statements on economic and population growth.</p>

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			The MSDF must work with official data sources. Economic data has been reviewed and updated.
		Pg 11 – provide details on the public participation process followed	Further detail provided in final document
		Pg 16 – draft George MSDF states that George has ‘very high growth potential’. This SDF inhibits this growth potential	This opinion is noted, yet the trajectory of a city cannot be determined on opinion which is not supported by fiscal analysis. The MSDF proposals are supported by fiscal analysis as well as analysis of trends and results of past practices. It seeks to improve on former policy and results will be closely monitored. It is noted that greenfield development is perceived to be the only measure of growth, yet the potential of latent rights is not recognised. The vitality and functioning of existing investments are seemingly disregarded and the national mandate to support spatial transformation appears to be overlooked. The balance between environmental and fiscal sustainability, economic growth and social inclusion is more complex than is suggested.
		Pg 19 – security estates and villages are seen by the MSDF as the root of all evil. These estates should be accessible to all people and must be serviced by integrated public transport.	It is understood that there is a role for security estates, the MSDF talks to the appropriate location and scale of these estates in terms of managing their disruptive impact on the urban accessibility systems, it does not identify them as the root of all evil. The very nature of security estates is to prevent access to all and their costs preclude their being affordable to all. The scale and density of security estates can compromise the ability for public transport networks to function optimally and for such estates to be serviced by public transport affordably. The scale and location of such estates must therefore be carefully considered. Their design can also severely compromise safety on streets and the convenience and comfort of the pedestrians, especially for those trying to access such estates to work. This external impact must be carefully managed.
		Pg 20 it would be difficult to attain the strategic goal of a Safe, Clean and Green George without a comprehensive understanding of what the cultural environment entails	This is an IDP goal and there are many facets to a Safe, Clean and Green George that are not heritage dependent. The importance of a comprehensive understanding of the cultural environment is not denied but everything is not dependent on this.

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		<p>Some of the spatial / conceptual proposals for York Road and Knysna Road/ Courtenay Street appear to be contradictory to a strategy on greening the city</p> <p>Also refer to similar comment relating to pg 50 of the draft George MSDF.</p>	<p>Greening the city does not necessarily require large green open spaces, landscaping can often play a more effective greening role. The proposals for Knysna Road/ Courtenay Street have been removed from the MSDF.</p> <p>Heritage protection is not a valid argument for promoting the need for outward urban growth.</p>
		<p>Pg 20 the draft George MSDF must be explicit about any further office developments outside the CBD. The Municipality's Strategic Goal to revitalise the CBD cannot be achieved by allowing vast new office developments in the Eden Meander Area.</p> <p>The 'real' CBD must be demarcated. Old residences around the CBD used illegally for offices or business should move into vacant land in the CBD The CBD fringe is an excellent area for housing densification close to employment opportunities. New developments in the CBD must be encouraged to have a housing component on above ground floor.</p>	<p>This is supported. Relevant policy wording has been strengthened.</p>
		<p>Pg 24 No sectoral plan including an accurate list of intangible and tangible heritage is contrary to legislative requirements and irresponsible within the current socio-political context of South Africa</p> <p>Also refer to comment relating to pages 32, 33, 44, 45, 52, 62, 83 of the draft George SDF, and Map 27 - This map is inaccurate in its current form.</p>	<p>Noted. The update of the current heritage resource inventory is prioritised as an implementation action, this however is not a sector plan it is an inventory.</p>
		<p>Pg 38 It is inconceivable that the SDF does not at least consider existing railway infrastructure and the potential opportunity that this may present within the context of the need for urban densification and integration</p>	<p>This railway line is not functional and will not be functional within the long-term vision period of the MSDF as per the indication from the rail authorities. The MSDF seeks to make aspirational but realistic proposals. The existing railway line does not assist with accessibility to and from priority development areas in the George city area. A road based public transport network and system has been prioritised as this is more affordable, flexible and within the control of the municipality and the province.</p>

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		<p>Pg 45 The number of erven available for development is disputed. The opportunities should also be considered in terms of income categories. Clearly there is an upward trend in building plan approvals and the residential reserve is being depleted at a faster rate.</p> <p>The higher and middle-income category is excluded from the MSDF</p>	<p>The upward trend in building plan statistics can also be attributable to the amnesty periods provided by the Municipality to regularise buildings.</p> <p>The suggestion that all higher and middle-income development takes on one form – security estates and greenfield site development only - and is therefore excluded from the MSDF is denied.</p>
		<p>Pg 50 Policy Guideline A4 (i) supported – what would this entail and how would it be implemented in practical terms? Is this linked to an implementation strategy to be formulated at a later stage?</p>	<p>Yes</p>
		<p>Pg 60 To remove space for expansion of schools and for new schools is in conflict with higher densities and population growth within an urban edge that allows no room to move.</p>	<p>While the point made that the urban edge allows no room to move is not agreed with, the point about school land is understood and granted. This policy has been reviewed.</p>
		<p>Pg 88 Policy wording is ephemeral and irresponsible and unsubstantiated. Please consider revising the wording</p>	<p>Policy wording has been reviewed. It is noted that the commentators are very critical of the sensitivity of urban densification and infill proposals to the built and cultural heritage but less so when policy wording is aiming to preserve heritage on the urban edge.</p>
		<p>Policy Guideline G(f) supported – what would this entail and how would it be implemented in practical terms? Is this linked to an implementation strategy to be formulated at a later stage?</p>	<p>Good Design Guidance is generally available, but a Good Design Guide has been published by the National Treasury.</p>
		<p>Pg 95 & 96 Fig 25 and Fig 26 Proposals for densification and infill development of Upper York Street and Courtenay Street. The spatial proposals are too specific and should be removed.</p>	<p>These are conceptual proposals that would require more detailed investigations. In the case of York Street, their conceptual nature has been emphasised in the revised MSDF. However, densification and infill, if well designed can complement and enhance built environment quality, performance and celebrate. It is however agreed that Upper York Street should be dealt with very sensitively. Proposals for Courtenay Street have been removed from the MSDF. It is noted that the commentators chose to interpret the conceptual proposals from an extreme, worst case scenario urban design perspective which was clearly not the intent of the draft MSDF.</p>
		<p>Annexure 3 – a provincial guideline does not need to be part of the GSDF</p>	<p>Agreed</p>

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		Pg 147 – 148 More detailed guidelines are needed to inform design and decision-making processes in the areas of Herolds Bay Lower, Kaaimans River	Agreed, these areas have existing LSDFs which will be reviewed to ensure alignment with the amended George MSDF.
		Pg 154 Is the Cities Support Programme Fiscal Impact Tool available online	Yes
47	Sustainability Research Institute, Nelson Mandela University in collaboration with Visual Resource Management Africa No. 8 (15 November 2018)	<p>It is commendable that the George Municipality recognises that a compact new urbanism city planning approach, which incorporates resilience thinking, is required. However, the proposed MSDF is mainly focused on fiscal resilience, which does not address all the possible vulnerabilities associated with Climate Change. While the MSDF does refer to Climate Change, this issue should be placed 'centre stage' in planning. The Garden Route and the George Municipality have great potential for the implementation of Natural Climate Solutions (NCS) as Climate Change mitigation. Specific set of land stewardship options available and their mitigation potential. In the George MSDF report not enough emphasis is given to this issue of stewardship options as a backdrop to implementation of the ideas inherent in the MSDF. As such, there is a mitigation scale mismatch to the intensity of the climate change risks at hand. A new, systems thinking based approach, where intra-institutional collaboration (within the Municipality) and across, or inter- institutional, collaboration must be pursued. Without implementing a systems thinking approach allowing for adaptive governance, the combined vulnerabilities of extreme heat and poverty, the lack of water availability and food insecurity, all exacerbated by climate change migration, could overwhelm the functional capacity of planning for a prosperous future George.</p>	Noted. The policies in respect of securing water sources and water quality has been strengthened and is supported by an aquatics study done as part of this MSDF process.
		We query the declining population growth rate of George (town) or Municipality	The George MSDF can only use an official, verifiable, public information source. A declining population growth rate does not mean that the population is not continuing to grow, it is. Notably the MSDF points out that households are growing faster, and household fragmentation can also explain informational settlement growth.

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	Table 1 refers to Resilience but needs to be unpacked	Table 1 is an excerpt from the Garden Route Regional Spatial Implementation Framework – further detail is available in this document.
	Map 2 has no legend	Map 2 is a composite of the MSDFs of neighbouring municipalities each with their own legends using different graphic language. The usefulness of this map is a concern. Alignment with the Eden/ Garden Route District SDF is clear and explained further in the MSDF. Inter-municipal issues are highlighted in the MSDF's Status Quo report and in the MSDF.
	The location of additional higher density housing is surely inappropriate on portions of school grounds. How does the school expand to meet the future increased numbers of people in the urban area when there is no land for expansion?	This point is taken and the MSDF has been amended.
	Table 12 – The George Municipality Climate Change Adaption Plan should have a greater emphasis placed on an actionable outcome and not ended with a statement “in so far as this is appropriate to the purpose of the MSDF”	George needs a Climate Change Adaptation Plan - the one referred to in the MSDF was done by the Eden District Municipality. Secondly what is said in the table is that in so far as the actions required by the Adaptation Plan are relevant to the MSDF - they need to be incorporated into the MSDF. Not everything that needs to be done will be directly relevant to an MSDF - it may be more relevant to another aspect of governance in George.
	<p>The following statement has great benefit for climate change adaption as well as linking to the green economy (Page 38).</p> <p><i>“There is a real opportunity to integrate the open space network and the non-motorised transport network in George to reinforce the utility and value of the “green fingers” (river corridors) penetrating through the urban areas and connecting communities. The continuity and connectivity of the green and the NMT network can be enhanced through their connections to the principal public transport/ activity corridors and the landscaping of these as complete streets for pedestrians, cyclists, buses and cars alike”.</i></p> <p>This initiative is strongly supported. However, more detail needs to be provided to define a clearer picture of the proposal, emphasising the link to green economy incentives. The following link to the organisation GreenSurge can provide further detail. However, the</p>	This detail needs to be fleshed out in a more detailed, specific study and plan for an integrated open space system and non-motorised transport network within the conceptual frame of green infrastructure. This is identified as an implementation action to be prioritised in terms of the George Municipality's IDP.

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		value of the services will need to be reflected over a long-term period	
		<p>Increased population densities require more functional and more effective utilisation of public open spaces. This sentiment needs to be reflected in the MSDF and supported <i>but not at the expense of existing public open space and parks.</i> This principle also applies to the PoS areas along Knysna Road where some existing park areas would be lost. Development should only take place of 'brown-fields' sites, with no loss to existing greenfield areas within the city's open space system. With predicted climate change impacts in the George area, these green spaces are critical mitigating areas for buffering climate change impacts.</p>	Noted. Protection of water courses has been strengthened. The Knysna Road infill proposal has been removed.
		<p>The protection and enhancement of POS is welcomed. However, a significant risk to the PoS is from ad-hoc informal settlement. <i>A joint committee needs to be set up, that includes all the governmental structures that allow for effective management of the PoS to adequately address this risk?</i></p>	This is a governance action rather than an MSDF matter albeit the MSDF, in identifying the importance of the POS system, provides the basis for governance of this system.
		<p>'Available data suggests that those residing in informal backyard shelters is almost equal to those living in informal settlements.'</p> <p>The use of the word 'almost' must be removed. It is an acceptance of a process and health status for residence of such structures that is unacceptable. The notion of 'Almost' is also a dangerous precedent. It is either existent as of the desired standard or not. This should also be regulated by health standards where backyard dwellers also need to be provided with toilet facilities (or managed accordingly). Increasingly there is also a tiny-house movement which allows for more formalised 'backyarding' which can allow for increased densities in suburbs. Is this municipal support for backyarding only supported in certain areas?</p>	<p>The use of "almost" is misunderstood. It is a statement of fact / evidence – the census data indicates that the number of households living in backyard shelters and those living in informal settlements is almost the same. It is agreed that areas with concentrations of backyard dwellings should be adequately serviced.</p> <p>Second dwellings are as of right in Single Residential Zones in the George Integrated Zoning Scheme By-Law and applies to the entire municipal area. This will need to be considered in the review of sector master plans.</p>
		<p>There is very little access to information regarding ecologically sensitive areas (especially wetlands which offer significant carbon sequestration mitigation opportunities). However, the value of carbon sequestration only applies to 'wet' lands. With increased extraction from agricultural farming concerns along the river areas, in conjunction overwhelming evidence of less and still decreasing</p>	<p>The George MSDF has used the best available information compiled by relevant specialist organisations and authorities. It is beyond the scope of an MSDF to conduct its own detailed specialist studies. Catchment management is a key concern. Specialist environmental input in this regard has been incorporated into the MSDF. A number of wetlands do have</p>

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	<p>rainfall in the medium and longer term, places these systems at risk. The assumption that these wetland areas are CBA by virtue of their mapped locality cannot be made. <i>A management plan needs to be set up to ensure that wetlands remain wet with increased agricultural extraction and less rainfall.</i> Part of this process requires the identification of critical wetlands that are vital for carbon sequestration and setting in place systems for their rehabilitation and long-term management as climate change mitigation areas.</p> <p>Industrial agriculture is increasingly present on the foothills of the mountains with large structure that visually degrade the landscape, detracting from the eco-tourism benefits that can sustain these areas. Principles for ensuring aesthetic landscape development is essential and strategies such as the creation of windbreaks to lessen the visual pollution of such structures instituted. This enhances the landscape character, as well as allows for significant carbon sequestration.</p>	<p>estuary management plans. This is a specialist function and not the role of the MSDF albeit MSDF policies and proposals are informed by information where available and relevant at the particular scale of an MSDF.</p> <p>This is best managed at the development application stage. Comprehensive Design Guidelines have been prepared for the Gwayang Industrial Area – if these works they will be applied to industrial architecture elsewhere. Guidelines are also available for development along scenic routes which should be applied in the assessment and decision-making on development applications</p>
	<p>Policy D5 addresses Disaster Risk Management How is this going to be monitored with what consequence? Low-density eco-estates in fynbos biomes such as Ballots Height, where due to the cost of additional insurance for preventative fires, residents are not burning firebreaks creates a significant fire risk to the surrounding. This is an unsustainable practice and likely to result in the loss of the fynbos in eco-estates</p> <p>Policy E1 refer to sustainable farming Local food security is not addressed in the MSDF which is a risk</p> <p>George must implement the required Climate Change Assessment. To our knowledge, George is yet to implement the required Climate Change assessment, which should fundamentally be a core component of any future planning for this municipality. <i>The main emphasis of the MSDF is on consolidation and development infill and is motivated on the need for social restructuring, as well as reducing carbon emissions.</i> This is commendable in that it will assist in reducing some of apartheid's historic spatial engineering and planned racial</p>	<p>The policy wording has been reviewed and Annexure 3: George Urban Growth Proposals Assessment Framework has also been revised. Peripheral/ isolated low density eco estates are not supported.</p> <p>Noted.</p> <p>The international solutions offered in terms of the six major urban vulnerabilities are welcomed and incorporated into the revised George MSDF where relevant. Not all of these can be dealt with in the MSDF in the absence or pre-emptive of a broader Municipal approach. It is noted that the George does need to implement the Climate Change needs and response assessment and response implementation plan. This is a key implementation action and its conclusions should be integrated into the next 5 year review of the MSDF.</p>

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		<p>segregation, as well as reduce carbon emissions due to a more consolidated city.</p> <p><i>However, this valuable exercise implemented in isolation to other looming climate change vulnerabilities, could over-burden existing services if increased service provision and planning does not address future climate change induced risks.</i> The question remains as to the extent to which the Draft George MSDF takes into consideration all the climate change vulnerabilities as per the South Africa Climate Change Bill of 2018. What are the likely vulnerabilities that the MSDF needs to take into consideration, and more importantly, how can the current planning be adapted to build in the resilience required to successfully overcome the risks? International solutions identified by major cities to assist in managing the following six major urban vulnerabilities are identified:</p> <ul style="list-style-type: none"> • Extreme Heat; • Extreme Heat and Poverty; • Water Availability; • Food Security; • Sea Level Rise; and • Sea Level Rise and Power Plants 	
48	Robby Robertson No.10 (23 November 2018)	<p>There appears to be some disconnects between the SDF Review and the George Comprehensive Integrated Transport Plan (CITP), which would seem to continue a 'siloed' rather than 'integrated' approach to planning. After all, does 'planning' not consist of the <u>spatial planning of land-use activities</u> on the one side & <u>movement system planning</u> on the other. The one cannot be divorced from the other. Figure 1 misses the point, while the CITP is not even referred to in Figure 2 (incidentally, the GIPTN is a subset of the CITP). That said, it is recognized that there might well be shortcomings in the CITP.</p> <p>The CITP is now due for upgrading, and hopefully this task will commence shortly (2018/19) and should include a transport modelling exercise that updates the land-use information and better</p>	<p>Fig 1 conceptually illustrates the municipal planning system. A CITP is a sector-specific plan. The MSDF is a transversal plan that seeks to integrate and manage trade-offs across sectors, including the transport sector.</p> <p>Fig 2 is a conceptual illustration of the land use management system. The diagram has been revised to show sector specific inputs into development planning decision-making. The MSDF seeks to integrate current public transportation network planning and road network planning into its policies and proposals for the management of land use and investment into development in space.</p> <p>Noted. The updated CITP will need to be an informant into the next 5 year review of the MSDF.</p>

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	<p>accounts for general traffic, and the mixed public transport system now partially in place. It will also provide opportunity to examine some transport linkages not previously considered</p> <p>The CITP includes a <u>road hierarchical structure</u> which was informed by the George Roads Master Plan (2005), but this does not appear in the MSDF. The GRMP recognized the relevance of certain new roads which have already been accepted or are under investigation. Those accepted must surely be illustrated in the SDF, as must the agreed hierarchy (refer to the absence of the Southern Arterial, the Western Bypass, Plattner Boulevard, Rand Street Extension & others).</p>	<p>The Roads Master Plan was approved in 2006, it is based on land use modelling up to 2015 and precedes the introduction of GoGeorge. It is in the process of being updated but information in this regard was not available to the MSDF drafting process. Nevertheless, planned road infrastructure was included in the MSDF to the extent considered relevant. The policy environment has changed significantly, this outdated plan is therefore used with caution. New roads needed are listed in the MSDF and illustrated where this was possible. The Southern Arterial is not supported by this MSDF within its 10 year timeframe.</p>
	<p>In addition, there are a number of other roads that could or should be provided to improve movement connectivity & urban integration. Refer to the Servitude Road (between Knysna Rd & NMB) & the link between the Plattner Boulevard to Wittfontein Road (Heather Park). Also a possible link road between Pacaltsdorp & Thembaletu as it relates to a recent discussion surrounding planning under way in Pacaltsdorp.</p> <p>Important was the recognition of 'super-block' grid structure needed to support the urban growth, and lending support for a secondary corridor from the Conville node at the intersection of Nelson Mandela Boulevard through Rosemoor to Knysna Road. While presenting some significant challenges going forward, such a link is deserving of serious consideration.</p> <p>High order roads such as the N2 may be perceived as barriers, but so too are railway lines, rivers & valleys. The N2 is vital to regional & nation connectivity and should not be dismissed negatively. The challenge is how are the effects of these dividing elements to be mitigated in the interest of better urban movement connectivity & community integration.</p> <p>Possibly there is a need to debate the shortcomings of the 'inherited' spatial structure from a connectivity / movement (or transportation) perspective and consider those links that might contribute to a more</p>	<p>The importance of road infrastructure linkages between Pacaltsdorp and Thembaletu is identified in the MSDF. It is also noted that a focus on the Southern arterial could detract from a shorter term focus on more affordable linkages and delay making these linkages – hence the focus on linkages other than the Southern Arterial. Other proposed linkages are noted but should be tested in the updating of the Roads Master Plan before formally included in the MSDF. The need for such linkages is nevertheless identified in the MSDF.</p> <p>These points are supported</p> <p>Noted</p>

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		equitable, sustainable, integrated & affordable long-term urban structure. This discussion is not apparent in the MSDF Review.	
		Achieving minimal operating costs for pro-poor, quality public transport system relies on the optimal use of a mixed bus fleet, and the management of the traffic situation. The hierarchical structuring role of the road network contributes to the affordability of the public transport system, and the better distribution & assignment of NMT, HGV & private car travel.	Noted, this point is now included in the MSDF
		A desirable 'what if' scenario could see a significant decrease in unemployment (to say 6% as per the recent Jobs Summit), with appreciable improvement in h/h income levels, to be accompanied by increased car ownership pressures. In this situation the robustness of the transport system could be tested, with walking, cycling & the GIPTN, offering the relief valve. There is limited spare peak hour road capacity available to absorb significant car usage, other than through higher congestion levels & peak hour spreading, this contributing to higher household transport costs, fuel use & pollution.	The prioritisation of public transport and a non-motorised transport network and infrastructure in the MSDF is to incentivise the use of public transport and NMT regardless of the household's economic fortune.
		It is necessary to be mindful that support for a mini-bus taxi type public transport solution (refer page 37) indirectly supports a car orientated solution. Research has typically shown that some 30% loss in PT users is likely where formal PT is replaced with informal paratransit or Jitney or mini-bus taxi type services, while the cost to the user is higher (refer Vuchic & others).	Noted, while the MSDF is fully supportive of GoGeorge, it is cautious not to assume the full roll out of GoGeorge in its current form and to promote an urban structure that supports public transport functionality based on a scheduled public transport service. The principles relating to urban form supportive of sustainable formalised public transport should hold and not be dependent on a particular public transport project.
		George is at an interesting stage in its transportation development, as it is progressing through the stage of <u>wishing to add roadway capacity</u> , and now moving to <u>increasing the transit vehicle capacities</u> , thereby increasing lane person carrying capabilities. The next step-up will be that of seeking priority rights-of-way that allow for added transit capacities & improved system performances. This has already been hinted at for the Nelson Mandela Boulevard. Given the 'what if' scenario, then the prospect of expanding to the semi-rapid transit	Noted although this will be resource dependent and dependent on the extent to which urban development is able to assume a form that improves the viability / affordability of such a mode. This point affirms the MSDFs caution in adopting the infrastructure required in terms of the Roads Master Plan of 2006, where these aren't improving the accessibility through greater permeability of the network within George.

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		alternatives will become logical (Bus Rapid Transit or even Light Rail Transit).	
		<p>Within George, the main movement corridors aligning with the topographical ridgelines which have very moderate longitudinal gradients. As such, the central spine roads should be capable of supporting bicycling, and logically lend support for denser urban development along the corridor spine roads, with the development density gradually reduced towards the valleys which are more or less free of development. In turn this supporting main PT along the spine roads, that is supported by community / feeder services using smaller vehicles in the less dense areas. But these smaller vehicles, which could be mini- or midi-buses, must be appropriately regulated (brought into the formal bus operation) so as to minimize the prospect of them cluttering up the space required for higher volume vehicles on the constrained parts of the network.</p>	This supports the approach set out in the MSDF. The point of regulation falls outside of the ambit of the MSDF.
		<p>The Draft MSDF proposes NMT linkages across the valleys to the south of the N2 (See page 35), however the intended form and scale of these routes is not that clear, and there is also no mention of the challenge of putting NMT routes through these spaces with no development to activate them and provide surveillance for NMT. There is currently no NMT Master Plan for George, and there does not appear to be any real reason as to why bicycling should not play a bigger role in the available transport mix. With reference to the routes suggested, these same routes could or should also be bus and/or general traffic routes so as to minimize transportation operational costs, & better distribute traffic.</p> <p>The draft MSDF review acknowledges the need to support a strong NMT network (page 37) but is not specific in distinguishing between 'utility', 'recreational' or 'experienced' bicycling. This is important as there is a plan (prepared by VRM & Stokes et al) showing possible recreational bicycle routes suitable for the experienced cyclists, but with little attention given to the needs of the utility cyclist that could</p>	<p>This is an important point and should be brought into the detailed planning and design of an integrated public open space/ NMT network – which should be linked to the work on an updated CITP and Roads Master Plan.</p> <p>The MSDF has been revised based on these suggestions but the hierarchy identified will need to be reflected in a more detailed plan.</p>

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		positively contribute to mobility needs at an affordable level. Map 6 should identify the GIPTN corridors as potential primary NMT spines with the routes feeding these as a secondary set of NMT routes. Then the linkages across (the valleys) between the corridors, and possibly along the length of the green fingers / valleys could be the third level of routes. The latter would be the core of the “proposed integrated open space network”.	
		<p>In the context of the GIPTN, there appears to be little opportunity for TOD's, implies a partnership development surrounding & supporting the transit operation, but some form of TAD may be doable where the state invests in the road elements, and the adjacent property owner contributes with the alignment and/or orientation & integration of the land-use activity to mutual benefit (It should be noted that the diagrams prepared thus far by NMA should all be seen as indicative and as work-in-progress).</p> <p>The definition of TOD should be clarified. The nodes along the corridor (beads-on-a-string principle) should possibly be given more emphasis. The GIPTN operation is seen as a catalyst to change.</p> <p>Reference to the R62 upgrading is puzzling & concerning - is this referring to the upgrading of the corridor and/or the road, and for what purpose. It certainly cannot be a substitute for the N2 due to its location, route profile (thus vastly different operating cost implications) and any upgrading to accommodate added HGV movement will severely impact negatively on towns along the route. (R62 not evident in Maps in the MSDF).</p>	<p>This point is agreed upon. TOD is a fairly widely understood concept in its broad intent, for this reason the MSDF has retained the use of this term but the nuance of Transit Adjacent Development being more relevant to the George context is agreed upon.</p> <p>Noted. The R62 is increasingly being used by heavy freight traffic and the impacts of these need to be factored into the future planning and maintenance of this route. The notion of upgrade of the R62 has its origins in the District SDF and is also envisaged as an initiative to create rural-urban linkages and support efforts to create employment opportunities in the rural nodes.</p>
		<p>The extension of the N2 as a freeway in an easterly direction is a matter that must be debated. The absence of this facility is negatively impacting on the Wilderness & other area to the east.</p> <p>The Western By-pass is due for construction within the next 5 years and will remove of large through trucking movements from the George urban network to the benefit of a more pedestrianized CBD. Apparently not considered to date is the location of suitable external</p>	<p>Noted the MSDF has been revised in this regard</p> <p>Noted.</p>

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	servicing & overnight holding facilities for long distance trucking operations (to possibly include inter-city bus operations), as well as overload control facilities.	
	Are the citizens of Uniondale now the citizens of George? Consideration should be given to respect that Uniondale while administered by George has its own identity. Incidentally, Uniondale is reflected in a separate District Municipality ITP, and there exists an IPTN concept proposed for Uniondale & the DM	Uniondale is now part of the George Municipality and this area should be integrated into an updated CIP and Roads Master Plan. The unique qualities of the rural nodes and its surrounds are addressed in their respective LSDF's, however said LSDF must be informed by uniform overarching policy.
	The GIPTN does not have a BRT operation, and the intention is that the MBT's will not play a role in the local PT operations (refer bullet 3)	Noted. However, this may not always be the position. This Figure is a reference source to support the argument that sustainable public transport systems are partly dependent on urban form.
	Pg 24 Table 3 Surely the sector plan is the CIP, with the GIPTN as a sub-plan. In terms of priorities, the GIPTN has a pro-poor agenda as priority.	Noted. The Table has been corrected.
	Pg 27 The second bullet does not make sense	This statement has been re-worded for clarity
	The Policy A3 could be stronger if there was more clarity with regards to what infrastructure is required to support the GIPTN.	Noted. This policy statement can be reviewed and strengthened on receipt of a reviewed CIP and Roads Master Plan.
	There seems to be no indication of the Social Housing Restructuring Zone on a map although a "Restructuring Zone" is referred to on many occasions through in the body of the document (p37, p89 etc.). Such a Restructuring Zone for George [in terms of Social Housing Policy, the Guidelines and the Social Housing Act, 2008 (act no 16 of 2008)] was promulgated in April of 2017. The sites identified as Restructuring Sites on Map 15 in the Draft MSDF are, as far as my understanding goes, outside of the promulgated Social Housing Restructuring Zone which focusses on the CBD and York street. Why I raise this is that there appears to be inconsistency in approach to where state led housing intervention should be focused in the future. Map 14 clearly shows that there is no budget focused on the CBD.	(Map 15 in the version published for public comment) Map 15 is a <i>spatial</i> budget map indicating vacant, developable land. Municipal –owned sites are identified in the George CBD. The MSDF clearly indicates that the Intensification Zone is also a proposed revised Restructuring Zone. Approval for promulgation of future restructuring zones must still be sought and the MSDF illustrates all those areas where restructuring initiatives are considered to support the achievement of the objectives.
	Map 10: The open spaces are not clearly highlighted, with the legend inconsistent with that on the map. Why is Thembaletu marked over Pacaltsdorp?	(Map 11 in the version published for public comment) Labelling error has been corrected. This map has been revised.
	Map 13: This map needs serious review. It is incomplete & inconsistent with other information.	(Map 14 in the version published for public comment)

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			The nature of what is considered to be incomplete or inconsistent is not clear
		Densification targets – are these gross or net. Is 25 du's / ha really the preferred? The targets seem very low in the context of what is desirable for a sustainable city.	25du/ha is a gross density proposed in the Provincial Spatial Development Framework. The George MSDF promotes differentiated target densities in priority public transport corridors and nodes. George is coming off a very, very low density base, 25du/ha can be considered a significant change from most current densities in the older, formally developed parts of the George city area. Densification takes place over many decades and the target will be reviewed in future MSDF revisions.
		Map 27: It is puzzling why Pacaltsdorp, given its history, is not identified as having cultural significance. Mission Street has been identified by Tourism as a focus area, while the street is in the process of being considered for upgrade to better accommodate public transport & NMT.	Noted, the map has been revised
		The document is not an easy read, with figures, maps and inserts often poorly presented and/or integrated with the text. As examples, the name Thembaletu is indicated over Pacaltsdorp, while the boxes containing findings of the Fiscal Impact Study (page 27 and 28) have little impact on the reader. A restructuring of the report seems indicated, while there are overarching general issues that need review and inclusion. George & Uniondale should be dealt with in separate parts of the document.	The prescribed format of the software used to prepare the document has limited options with regard to presentation and image/ text integration, Mapping error has been corrected. George and Uniondale are both part of the George Municipal Area. Uniondale is also the subject of a separate LSDF.
		It is unfortunate that there appears to be a gap between some of the land-use / transportation issues, as it should be an objective that both the MSDF & CIP (together with certain other plans) are aligned, and that the IDP then talks to the implementation. While the MSDF & CIP establishes the developmental framework, the drivers for change come from the sector plans including the CIP.	Noted. Future updated approved sector plans will certainly assist future revisions of the MSDF.
49	Lynette Groenewald Urban Content No. 42	With reference to the draft 2018 MSDF, the intent (role) and contents of the MSDF and the approach to the development of George should be extended to include:	Noted. While the MSDF defines policy that inform decision making, all initiatives both government or private sector driven must align

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	(5 December 2018)	<p> <input checked="" type="checkbox"/> Specific spatial expression on how tourism and Local Economic Development (LED) will be supported in respect of initiatives by the people/SMME'S (not only government plans); <input checked="" type="checkbox"/> Spatial policies and delineation of use zones and relevant wording/plans in the MSDF to foster private- and NGO investment in all sectors; <input checked="" type="checkbox"/> The Structure/Plan of the MSDF is contradictory to the stated principles and should be corrected, specifically relating to: <ul style="list-style-type: none"> o Integration in the right direction – towards the primary node o Supporting areas where local initiative can be accommodated – specifically relating to tourism, service delivery and arts&crafts. o Acknowledging George's regional importance and capitalizing on it by aligning the spatial plans to create opportunity </p> <p>In short the MSDF portrays the structuring intent of government – and the principle and extent of the initiatives are laudable and supported. <i>But the land use opportunities/choices and participation in the economy should serve the aspirations of all (government/residents/businesses/organizations/institutions) – and is not only a function of identified government projects.</i></p> <p>MSDF should thus include spatial policies and structure to enable everyone to work, live and thrive in George and open spatial options for them to do so.</p>	<p>with policy. The contribution of SMME's in the local economy is recognised and addressed in the policy statements of the MSDF, refer to Policy G. These policies will form the basis of further sectoral plans and local spatial development framework as well as focussed sectoral policies that may be developed. The Tourism and LED sectors are diverse and strategies to support these sectors are addressed in the respective sectoral plans.</p> <p>The MSDF aims to direct integration inward and initiatives supporting the strategy is already underway.</p> <p>The MSDF is the platform where government policy and local needs are married to ensure the detail of all initiatives emanating from it are structured toward achievement of the goals of said policies. The alignment of decision making with government policy supports funding support initiatives which serve as catalysts for increased investor confidence and resultant private sector investment. The MSDF by no means excludes any part of its constituency but should not be perceived to be a land use management tool.</p> <p>The MSDF does not grant rights nor does it remove rights and the level of detail required to address the statements made here are best done in local spatial development framework and in the zoning scheme by-law as it requires a much deeper level of public participation and stakeholder engagement.</p>
		The "Only Nodes and Zones Principle"	

	<p>The South Cape Economic Partnership (SCEP) must be approached to evaluate the MSDF with specific regards to land ownership for small businesses, to ensure that opportunity is facilitated;</p> <p>☐ Another category/level (instead of just primary node/secondary node and intensification zones) of non-residential use must be included in the MSDF. Just as investors and government need the “guarantee” that, when they invest in social- and economic development, it will be supported from a zoning approval perspective, so must social- and business entrepreneurs be encouraged by the intent of the Council’s spatial policies to allow businesses where the market dictates. As noted in the Quotes (Annexure A) economic growth is encouraged, but the manner in which space is given to do this excludes all new entrants and small-medium entrepreneurs. Possible ways in which to include a new nodal/zone land use category are:</p> <ul style="list-style-type: none"> o Allowing space (small erven), (Entrepreneurial zone) and identifying funding (DTI for example) for business-owner owned “hive” sites (retail/market/commercial/arts & crafts/food courts). An interface between the current industrial area and open residential extension area will be a good location. See par 2.2.3 and the sketch included in Par 5.2.1.1. (Marked as mixed commercial/light industrial zones). Although there is space for this in town, the price of these sites is un-affordable (private market); o It should be stated in the discussion on economic zones and nodes in the MSDF that, in supporting small business, the Planning Bylaw may make provision for limited non-residential land use to support small business, within traditional residential areas; o Land (Entrepreneurial Zones) must be set aside with the proviso that it is available for development to private/organized NGO’s/Groups/Business Chambers on a rent to buy basis and conversely, formal, market related, industrial land must be delineated (alternative position proposed); o Many tourism-related small businesses should be allowed to run their businesses from their holdings/farms, subject to applications for consent/departure – the MSDF should state such allowance, as 	<p>Noted.</p> <p>Agreed. However, running a business from a self-owned property must be managed in the interests of the broader system The Integrated Zoning Scheme By-Law supports business from residential property with some restrictions to ensure the quality of the living environment and vitality of formal business areas are not compromised. This level of detail is however not addressed in the MSDF and may be depicted in local spatial development frameworks with due cognizance of the policy guidelines that may inform these initiatives.</p> <p>The disposal of land is managed in terms of Council Asset Transfer Regulations in accordance with procurement policies.</p> <p>This is not necessary to be addressed on the level of the MSDF. The Zoning Scheme is the appropriate land use management tool and currently facilitates tourist facilities and other value adding activities as possible consent uses on agricultural properties.</p>
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	<p>another “Business zone level”, as it may currently be read that only the allocated zones can accommodate businesses. The MSDF must inspire development by the people for the people rather than just securing development opportunities for the state and more affluent people/large companies.</p> <p>☐ I.e. allow, in the wording and expressed intent of MSDF, leeway for a layer to create/support local small business industry - either allowing defined limited business in the whole urban development boundary (udb) area (with set guidelines) or allowing merit applications outside nodes or creating freehold, privately owned opportunity mixed use zones – or secure pockets in identified nodes (private or public) for small-medium entrepreneurs’ use. For instance including a standard clause in new shopping centre development to ensure construction and controlled lease of market areas/ transport facilities. This has been done in other local authority areas.</p> <p>☐ The Local Economic Development Department of Council must be informed of the practical implications of the MSDF for small business development (local people wanting to start a business) or else they will have an impossible task to fulfil. They must comment, specifically, on where people, that have initiative (at scale – not few selected individuals), can take part in land use/ownership, on a practical, market-driven, affordable basis - if the MSDF stands as it is now.</p>	<p>The expansion of the zoning categories in the zoning scheme should be addressed in revision of the by-law. The MSDF is already clear that it supports inclusivity and initiatives that induces resilience</p> <p>The MSDF is not considered to be exclusive but pro-poor and the detail level planning is captured in the local spatial development frameworks for each respective area</p>
	<p>Support for tourism- arts & crafts-, and community support amenities in the MSDF</p> <p>The South Cape Economic Partnership (SCEP), the Domestic Tourism Management Branch and the N12 Treasure Route (TR) Association must comment on the MSDF Plan, specifically to confirm whether their-, other public- and possible new/existing private development opportunity has been spatially considered and encouraged;</p>	<p>Specific project or initiatives cannot be singled out in the MSDF as this may be construed as resulting in bias decision making.</p>

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	<p>☑ Mixed opportunity zones must be provided for, at least, in the following areas and included as tourism/social/community active zones:</p> <ul style="list-style-type: none"> o Strawberry farm – See proposals for western extension of George to be considered – par. 3.2 – to link with formal tourism zones along the R404. Smaller division of land to be allowed to enable land to be released for tourism establishments – can place use restrictions (i.e. no single residential etc.); o Stalls next to Hops Farms on N9 – again enabling division or allowing more than one stall in agriculture zoning. To be specifically included as an appropriately defined zone in the MSDF. It is not proposed to extend the urban edge in this instance; o The strip of land both sides of N2, between mall and Sasol Garage or Victoria Bay Turn-off – Again, a secondary road system can be introduced to coincide with allowed access points from the N2 and a provision can be included that buildings/stalls must be off-set as to not hinder views to the mountain, no visible parking areas, etc. (design guidelines to be set with the delineation/defining of the tourism-community-supportive use mixed zones). Offices for paragliders, etc. can be accommodated in such zones. This zone already accommodates a church, guest houses, an antique shop, koi farm, garages serving passing traffic/tourists, horse farm, the Outeniqua Market, and popular breakfast stops. The uses have been part of the urban fabric of George for a long time and are well-known destinations for tourists. The new development of a curio shop at the unused station premises, together with a tourist coffee & eat stop is a positive addition the tourism/service economy of George. o The entrance routes to George are ideal for Tourism/mixed use LED opportunities and should be spatially shown as such in the MSDF; o The vacant land next to the Sandkraal turnoff from the N2 is ideal for a Regional Business development – the “feel” of the development may include a local character – to create tourism/arts/crafts tourism opportunities (whether as rental in 	<p>All the activities on these sites are facilitated and supported by land development approvals. The principle of adding value to agricultural entities are supported, however once again, operator cannot be singled out. The division of agricultural land is governed by policy of the Department of Agriculture and the MSDF cannot be mis-aligned with said policy</p> <p>Such initiatives are not opposed in the MSDF but indeed subject to availability of infrastructure and this area is envisaged for tourism development. This can be facilitated again in terms of the current consent uses allowed in the agricultural zoning yet does not require subdivision of the land as subdivision sterilises the land for future agricultural use or sensible urban expansion, whichever long term objective may apply.</p> <p>Refer to the LSDF applicable to this area</p>
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		larger complex) or as smaller available sites – subject to detailed design guidelines. The node may be a “bead on a string” node along the relevant development zone. The position next to the N2 will offer obvious advantages in respect of regional reach and visibility, whilst the position near Pacaltsdorp will bring job opportunities (and retail) closer to people. The inclusion of this site as a restructuring zone is a mention worthy inclusion in the MSDF. How well regional community service provision/tourism/arts craft opportunities are incorporated into the design/use parameters and how small business is incorporated on a business-owner-landowner basis will surely be monitored by Council – the devil is in the detail!	
		<p>Economic/Service Delivery Opportunities based on the Regional importance of George</p> <p>All land, next to the N2, which is not sensitive environmental area, should be allowed to develop as it offers comparative advantage for higher order community supportive facilities (tertiary education, retail (at nodes as per the MSDF), regional markets, regional emergency services, regional health and social facilities; regional tourism and recreational destinations) based on the accessibility of the area, from the airport node, York street, Sandkraal node, N2/N9 node (subject to access) up to either the Sasol garage or Victoria Bay turn-off;</p> <p>☐ Urban design guidelines should be formulated and imposed, as standard on all properties adjacent to the highways – to protect the positive visual impact of all land use elements of George and to support permeability from adjacent urban fabric;</p> <p>☐ The Destiny Africa zone must have a distinct regional function – specifically geared towards tourism and regional uses, albeit including some housing. If housing is allowed to be the predominant use, a massive investment/job creation/regional opportunity will be lost and the development of this zone, linked directly with Pacaltsdorp will not uplift that community – it will merely extend the existing community. If attracting investment is the focus of this</p>	<p>Noted. This poses a risk of urban sprawl and is mis aligned with national and provincial policy. The fiscal implication of such development of the municipality could potentially impact on its ability to deliver quality services and such notion will therefor need to be modelled and proven to be fiscally sustainable</p> <p>Noted, regard is given that the site can render an outcome of regional significance yet can also facilitates spatial transformation and inclusivity as a large portion of the city’s population can benefit from the employment opportunities as well as incremental housing opportunities</p>

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		<p>zone and tourism/recreation/high order (regional) community facilities, like sports incubation hubs and tourists' villages and accommodation is included, then the shortening of the implementation period should be considered. The strategic intent of this land should be set in the MSDF and development proposal should follow suit. This is not a good location for local offices, general shops (unless on the interface area with Thembaletu).</p>	
		<p>Proposed Industrial Area & Existing Market area</p> <p>Industrial expansion should be considered closer to Thembaletu – south of the N2, possibly on vacant land between the urban edge areas west of Thembaletu (along Beech Road) and Thembaletu. (Not at the node on N2 at Sandkraal and/or Beech Road intersection).</p> <p>☐ The area shown as “New industrial area” in the MSDF should be used for an large, coordinated, integrated housing project (planned overall, but land released on incremental basis), which may contain elements/interventions with respect to all land use components (social/educational/commercial/retail) – as is usually funded as part of Government’s Megacity projects (Affordability mix – bonded and subsidized, Typology mix and full range of urban supportive uses – funding for bulk services included).</p> <p>☐ The presence of high income areas to the west of George should not negate the integration zone, but measures must be put in place (via design) to protect existing property values. (examples of developments that cater for different income groups, like Steyn City/Diepsloot, Cosmo City/Jackal Creek and others, which co-exist, to be investigated).</p>	<p>Refer to LSDF for Thembaletu</p> <p>Residential opportunity is envisaged on the expansion site, however the locality in respect of the rail infrastructure and the potential to optimise the use of safety radii around the waste transfer station and waste water treatment works along with the synergies that can be achieved from its proximity to the existing industrial areas and en-route to the airport renders a more optimised suitable use of the land for light industrial opportunities.</p> <p>It is not clear where the perception originates from. The MSDF promotes inclusivity and integration without exception.</p>
		<p>Proposed Residential Intervention Zones</p> <p>As noted above, the best position for integration should be considered as the area between the CBD and Pacaltsdorp</p>	<p>Integration is encouraged in existing built areas in proximity to place of employment through infill development and incentivising the take up of latent rights. The node referred to does include a</p>

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			residential component but will contain mixed uses to ensure employment opportunities are developed in closer proximity to the existing suburbs south of the N2
		<p>Estates</p> <p>Although not a personal preference, the role of estates in George must be evaluated. Estates are a preferred housing option for the aged and George is a well-known destination for retirees. It offers a housing typology where the owner need not concern himself/herself with maintenance of the property, a “lifestyle promise” draws people and there is a perception of secure property value. Estate-living is also a land use associated with living in a beautiful natural environment such as George (can afford to draw the natural elements such as open space corridors, into the development and has a positive visual impact). Most importantly the Estates of George has brought people with spending power to the local economy, including income to the municipal coffers.</p> <p>Estates are to be viewed as just another housing typology. Estates should be located on the interface between natural/agriculture areas and the udb (not in town centre or infill areas) and may serve as urban development buffers. If more estates are allowed it may result in more competitive pricing of available stands and allow more affordable housing options, without government intervention (housing provision).</p> <p>The financial sustainability of a Council hinges on creating a balance between expenditure and income. Favouring initiatives to address transformation of the town to advantage the disadvantaged takes time and if the expenditure required in that time is not balanced with income, the Council may not be able to fulfil its function effectively. So estate development, in specific zones, may be seen, in the George context, as appropriate. People move to George for “the lifestyle” and those that do, prefer (and can afford) estate living. Housing typology options should be as diverse as possible to give credence to the vision of George as a “city for a sustainable future”.</p> <p>The financial sustainability of a town/region hinges on the local authority’s ability to attract and keep income generating land uses.</p>	Refer to lines 46 and 47

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		<p>The latter cannot be substituted by government investment in the long term, as stated in the MSDF.</p> <p>Where in the MSDF is opportunity shown for extension of middle and high income housing? Existing opportunities (in one or two private estates) are over-priced and will remain so, unless additional areas are opened up. This will encourage upward mobility – an accepted way to enable previously excluded groups to move into established areas.</p> <p>Areas adjacent to successful estates and areas where the urban edge must be defined (specifically between existing residential and natural areas) should be shown as estate zones in the MSDF. Smaller pockets of this type of zone will also open up development opportunities for smaller development entrepreneurs in George.</p>	
		<p>The Public Investment Intent vs the Private Development intent</p> <p>Private ownership of business properties must be allowed by extending the non-residential use layers, as previously noted, thus enabling entrepreneurs to obtain (easily) defined business rights for their limited business endeavours, in situ or on small, well located erven. The intent to support this proposal must be stated in the MSDF. Experience has shown that, although flourishing for a long period of time, some small enterprises had to close down after applying to Council for rights;</p> <p>☑ Successful private enterprise, which has been sustained over a period of more than five years, must be encouraged to continue with current tourism/ arts and crafts/ business/ commercial/defined retail in current localities, without the fear of being denied rights on application based on the fact that they are not acknowledged in the general zones – specifically those operating in the spheres of tourism and community supportive functions;</p> <p>☑ Government initiatives must work towards release of land, for both residential and non-residential land. This must be stated as a principle in the encouragement of economic growth. Release may be premised in such a way to favour small business and must be included as a pre-requisite, from the Municipality's side, in all joint governmental projects;</p>	Noted

	<p>❑ Private residential development must be encouraged. The market will dictate whether the developer can develop on a profitable basis – this is not the concern of Council. The benefit will be a more competitive market which will result in more affordable units. Experience shows that affordable houses in George are not always available in the localities that potential buyers prefer and rental units are even scarcer. The provision of these two components should not be a competency for which government is responsible. The community of George should be able to participate in this economic sector (small and large scale) and the MSDF must allow spatial provision for this to be done. Densification/subdivision is an excellent way to achieve this (if services, like roads can carry the burden) or new areas should be included in an incremental manner. In short – both public and private investment must be given space to realize in the George MSDF area.</p>	
	<p>Inward growth Again, an additional “layer” of mixed use zones must be added to ensure a finer grain of integration of uses.</p> <p>❑ Regional opportunities must be taken advantage of by creating space allowance for a variety of functional nodes along the N2. Integration (creation of job opportunities and providing services) of existing urban fabric is just as important as integrating new development.</p> <p>❑ Dedicated area/zones to encourage community orientated land use and services and tourism/sport/ recreation uses to be incorporated to serve the wider community – also the neighbouring rural areas and adjacent smaller settlements;</p> <p>❑ The structure must allow a variety of housing typologies for a variety of affordability levels – to be delivered via public and private investment. Infill spaces (as already identified by Council, in the CBD area, to be used for higher density housing. Densification of neighbourhoods to be allowed with forethought, where services (roads specifically) can accommodate it. Space to be afforded to the development of estates in positions where it creates a buffer</p>	Noted

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		between high intensity use and natural sensitive areas, and rather not central to the City area where it can hinder access/use integration.	
		<p>Densification Densification, as a principle should be supported, only if:</p> <ul style="list-style-type: none"> ☑ Quality of the living environment is not compromised; ☑ The original residents are better off, in terms of property value, after the densification (as in the instance of accommodating back yard structures; ☑ Services can accommodate the additional burden; ☑ There is no better location for the new residential – congruent with their affordability levels (and with government assistance); ☑ Densification doesn't result in risk (fire/health/safety) for the existing and/or new residents. <p>Distinction must be made between measures to integrate existing settlements into the urban fabric by linking them to services and urban supportive facilities and integrating new arrivals/informal residents. The former requires services to be brought to disadvantaged areas. The latter is better served by moving people closer to existing formal facilities and services.</p>	Supported, subject to compliance with SPLUMA principles
		<p>Regional Function The MSDF must define the regional functions to be accommodated in George (red book standard) and show how these functions can be accommodated spatially via the MSDF. There is a demand, for example, from a provincial sport perspective, for central sports fields. This and other social/educational/health and other higher order community functions (including markets, emergency services etc.) must be categorized in accordance with the requirement and space requirements (national policy) and placed in the Urban structure to allow the accessing of government and investor funding to realize these functions.</p>	<p>It should not be assumed that regional functions be accommodated in new facilities. The scope for investment in new facilities has significantly diminished. Existing facilities can be shared, re-used, expanded, etc. The preparation of an SDF is not a blueprint planning exercise. A standard approach to space requirements is also not sustainable. Budgets and land do not exist to follow these requirements or to maintain the land set aside for facilities as per the standards. Creative solutions need to be sought.</p> <p>The revised Red Book was not available at the time of preparing this MSDF and the existing red book is outdated.</p>

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		<p>Regional functions should be very accessible (along accessible (not inner CBD) positions along main roads) and may act as an integration mechanism between the areas north and south of the N2.</p>	<p>Regional functions should be accessible but not necessarily by private motor vehicle. The catalytic impact of regional facilities also needs to be considered in terms of its local economic development impact – if a hospital is located in a remote but accessible location for vehicles, the local economic development opportunities that could have been realised around this hospital– restaurants, convenience/ gift stores, accommodation - to the benefit of a range of income groups are lost. The convenience with which those who must travel by public transport or foot is also compromised.</p>
		<p>The following issues should also be addressed in the finalization of the MSDF:</p> <ul style="list-style-type: none"> ☑ The pedestrianization/ walkability and compacting proposals in the CDB area is supported – this will create a sense of place and a scale/density of use congruent with national/international intent as far as primary nodes are concerned. The TOD principles are also supported. Residents of George, specifically the elderly (many in George!) must have the option to access all retail/social services in other nodes/locations that area accessible for those who cannot walk far distances. Access for emergency services may be hampered by densification/pedestrianization/traffic increase and solutions to this challenge must be available via the MSDF; ☑ An integrated park and open space system must be actively planned and implemented to not only serve engineering requirements (storm-water management) but also to retain the enviable “lifestyle” feel of George (to benefit all areas – including the main access ways and the CBD. Visual impact is a main contributor to the pride which all people feel in their town and to property value. The public realm must be kept green and definitely extended into the densification zones. ☑ The green- and open space system – as they are currently presented, do support the use of George’s attractions/facilities from a tourist/recreation perspective and should be expanded. I.e. there must be a definite links, shown in the MSDF, between the open 	<p>This level of detail is not desirable in the MSDF and are best addressed in the detail it deserves on sectoral basis</p>

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		<p>space system, tourism and creating a sense of place (enjoyable living environment for all) and fostering community use areas. These functions lie with different departments in Council and the MSDF must promote and ensure that a cross-beneficial system is devised.</p> <p>☑ The identification. of additional main arterials is supported.</p>	
50	SANPARKS 92 (20 Jan 2017)	<ul style="list-style-type: none"> • The SDF is supported • Extensive agriculture is not supported in Critical Biodiversity Areas and Ecological Support areas (Ref Table 9, pg 66) • GRNP Expansion Footprint and the Wilderness Protected Environment to be added to the CBA map (Ref Map 18) 	<p>Table has been updated</p> <p>Information added to Map</p>
51	Heritage Western Cape (HWC) 88 (28 Oct 2018)	<p>It is acknowledged and appreciated that the SDF states that:</p> <ul style="list-style-type: none"> • Management of both the public environment and buildings, which is a product of a well-structured, safe and high-quality built environment • Keeping development patterns in line with the character and landscapes of the settlement • The management of all heritage places and landscapes in accordance with the findings and recommendations of the Municipality's heritage studies • Maps of all known heritage resources and cultural landscapes • The delineation of Heritage Protection Zone / Heritage Areas <p>The incomplete status of the Heritage Inventory, as a means to manage this intent of the SDF is identified as a concern.</p>	<p>The completion of the Heritage Inventory will be dealt with in a separate process to the SDF</p>
52	Western Cape Department of Transport and Public Works 89 (5 Dec 2018)	<ul style="list-style-type: none"> • It is proposed that the SDF reflect that the Comprehensive Integrated Transport Plan for George, under review, will be guided by principles and objectives as outlined in the Provincial Land Transport Framework in order to best align with the George MSDF. • Overall the draft George MSDF explicitly articulates some of the key transportation principles and strategies as documented in the NLTSF (2017 – 2022), and the PLTF (2017 – 2021). In doing so, the draft George MSDF successfully enunciates and defines how an integrated spatial relationship between land use planning processes, and the integrated transport plans will function within 	<p>The report has been edited to reflect that the review of the CIP should be guided by the principles and objectives of the PLTF, in aligning to the George MSDF.</p>

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		<p>the city. The draft George MSDF takes careful consideration of the impending review of the currently approved George CIP (2013/13) and provide s a substantive foundation in aligning the new CIP with the MSDF.</p> <ul style="list-style-type: none"> • It is recommended that any future review or updating of the George MSDF must seek to achieve further alignment between the George MSDF and the George CIP. This will be imperative in order that land transport planning be integrated with the land development and land use planning processes, and the integrated transport plans. 	
53	Western Cape Department of Agriculture	<ul style="list-style-type: none"> • The WCDOA is satisfied with the urban edge as indicated as it maintains a relative conservative urban edge around George • The WCDOA has in principle no objection to the proposed principles on which the urban edges of the following areas will be delineated: Blanco, Pacaltsdorp, Thembaletu, Kraaibosch/ Glenwood, Wilderness, DMA, Victoria Bay and Herolds Bay • The WCDOA is satisfied with the Land Use Guidelines for Spatial Planning Categories for Intensive Agriculture as well as Buffer 2 areas which include extensive agriculture areas. • Current agricultural activities in the whole area of Hans Moes Kraal is of significant value to agriculture. Small farming units in a combined form contribute significantly to agriculture and agricultural produce. This area is considered important to agriculture biodiversity and agricultural character, the WCDOA is of the opinion that the whole area cannot simply be earmarked for development. Planning should be in an integrated holistic and coherent manner as to allow for agricultural and related practices and to protect the rural character of the sea and countryside. Dialogue with WCDOA is requested on principles, no-go areas and norm and standards prior to any development. An overarching Agricultural Impact Assessment should be done to inform the status quo and future planning. The SDF should not create an expectation of sense of entitlement for development rights in this area. • Development inside the urban edge should be concentrated on. 	<p>Noted</p> <p>This matter has been noted in the revised draft MSDF</p> <p>Supported</p>

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		<ul style="list-style-type: none"> • The Destiny Africa site should be developed prior to the consideration of development in the Hans Moes Kraal area. • Undeveloped land with rights results in the loss of agricultural land and opportunities • It is requested that Lagoon Bay, Skimmelkrans, Duttons Cove, Hans Moes Kraal, Destiny Africa Fancourt Retirement Village remain outside the scope of the MSDF as they may impact negatively on agriculture and the environment. Processes should be followed according to the SDF and the integrated zoning scheme. • Table 6: Critical Biodiversity Areas: No Natural Areas remaining – edit suggested “They no longer contribute to the plant species biodiversity of the area”. • Existing small holdings/ farms smaller than 3 ha should also be subject to the Department of Agriculture’s regulations. 	<p>Agreed. The MSDF identifies the Destiny Africa site as the priority growth direction</p> <p>Agreed</p> <p>Noted. MSDF edited – all properties outside the urban edge are subject for the Department of Agriculture’s regulations</p> <p>Table has been updated</p> <p>MSDF has been revised</p>
54	Cape Nature 91 (11 Dec. 2018)	<ul style="list-style-type: none"> • Where applicable the document needs to be updated to include the Western Cape Biodiversity Spatial Plan (WCBSP 2017)², which replaced the Western Cape Biodiversity Framework (WCBF 2014)³. Table 9 in particular has the old categories and definitions associated with it and it is unclear if the Map 18 used the most recent version of WCBSP or the final shapefile layers of the WCBSP (2017) • It is recommended that the latest South African Protected Areas Database be downloaded and used where required. It should also be noted that Private Nature Reserves are defined as protected areas in terms of National Environmental Management: Protected Areas (Act, 57 of 2003) (NEM: PAA) as well. • Within the SDF there is no mention of how the presence of WCBSP (2017) CBA layers, Critically Endangered and Endangered vegetation is resulting in George Municipality having to undertake biodiversity offsets due to the sensitivity of the remaining landscape. This is a serious constraint on development and it is recommended that a proactive solution be sought to limit development where such conflict exists. This development 	<p>The MSDF has been updated in this regard</p> <p>This MSDF has sought to avoid sensitive vegetation where land for future expansion is identified. A policy guideline has been introduced.</p>

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		<p>constraint needs to be addressed within the SDF and considered when proactively identifying land for future urban expansion. Conversely land should also be proactively identified as sensitive and avoided accordingly.</p> <ul style="list-style-type: none"> • It is understood that all WCBSP (2017) data is remotely sensed and it has its own limitations, however it is the best available science in its field and for the purpose of an SDF is more than sufficient enough in terms of scale. Should the WCBSP layers be questioned in terms of their accuracy, it should be done so during more site-specific applications. 	Noted
55	Department of Environmental Affairs & Development Planning: Waste (87)	<ul style="list-style-type: none"> • The SDF document is lacking detail for the integrated Waste Management and integrated waste management planning. • Solid waste management needs to be covered in the SDF including the location of landfill sites, identification of new sites, opportunities for recycling and potential depots, existing capacities versus future growth and densification needs to be assessed. • The IWMP needs to be incorporated in a short concise plan • There should be a split in the capital disbursements • They refer to the 2014 IWMP this is not speaking to current or future documents so this needs to be updated. The latest IWMP information needs to be referred to • There is no reflection of the status of the priorities w.r.t. waste priorities. What is the status of the waste sector plan and will this not affect the future planning of waste as part of the SDF? • It is suggested that if the waste sector plan is updated (currently 2014 version) or is being drafted concurrently with the SDF, attention to the spatial aspects of the waste sector plan must be given to ensure that the sector plan is aligned with the SDF's proposals. • The SDF must include the capital projection costs for the development of integrated waste infrastructure (see Assessment of municipal integrated Waste Management Infrastructure: Eden District Report, September 2016). 	<p>It has been confirmed that the 2014 Integrated Waste Management Plan is the only available IWMP. This is under review, but the review will only be available in August 2019. Its findings, where relevant will need to be considered in a future review/ amendment to the MSDF.</p> <p>This comment has been provided to the Waste Management Department of the Municipality to ensure that the Sector Plan is informed by the MSDF</p> <p>The effective management of waste must be considered to ensure the legal requirements of the Waste Act such as waste minimisation, recycling, the diversion of waste from landfill etc. and other potential processing systems of such waste are not spatial in nature and are not core to the purpose of an SDF, this is more relevant to the role of an IDP and the sector plan itself. However, a policy guideline has been introduced in favour of recycling to reduce the pressure on and for land extensive and expensive landfill sites.</p>

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		<ul style="list-style-type: none"> The priorities for waste should be described in this section 5.2.3. Just as waste water treatment priorities are articulated and identified so should the priorities of waste in relation to the municipality's SDF and in relation to the legal requirements of the environmental specific legislation, the Waste Act. 	
56	Department of Environmental Affairs & Development Planning (DEA&DP) – Spatial Planning 90	<ul style="list-style-type: none"> DEA&DP's procedural compliance review of the MSDF preparation process confirms compliance to date with a number of steps remaining to be followed in due course. DEA&DPs review of the draft MSDF against the content requirements of a MSDF in terms of SPLUMA suggests that the MSDF is complete, bar two points: Have specific areas been identified where more detailed local plans, policy and development parameters will apply and guide decision-making on land use applications? <i>Yes, LSDFs are reaffirmed and a broad statement is made that some may require amendment to bring them in line with the amended SDF. These LSDF composite maps need to be shown in the George SDF and where major misalignment is identified – this needs to be highlighted directly. That is, the George SDF needs to give direction to the nature of the amendment required in the LSDF.</i> Have specific areas been identified where shortened land use development procedures may be applicable and land use schemes may be amended? <i>No</i> <p>Overall Impression: The amended George SDF builds a robust and strong argument using data and evidence of the desired growth path for the municipality. The application of the National Treasury's (Cities Support Programme) Fiscal Impact tool builds an excellent argument that greatly assists in decision making around the development future of the municipality.</p> <p>3.1.2 All of the strategies, policies and proposals are strongly supported. The goal of working towards improved financial and</p>	<p>Noted</p> <p>It will not be meaningful at the MSDF scale to present a composite plan of the LSDFs which also require review to ensure alignment to the reviewed George MSDF. The Municipality has conducted a gap analyses of the existing LSDFs in terms of the reviewed MSDF to inform review of the LSDFs.</p> <p>In Section 5.2.1 (i) Priority Investment Areas (Restructuring Zone) it states that 'These areas and the priority nodes specifically should be the focus of any municipal investment incentives including expedited land use development procedures and/or relaxation of development controls; e.g. parking requirements.</p>

	<p>spatial sustainability, integration, resilience, compaction, infill, densification and spatial targeting of development energy are all in line with the PSDF's objectives. There are areas where small 'tweaks' may be considered, which will be addressed in comments to follow.</p> <p>3.1.3 What remains, however, is to ensure that the municipality of George now follows through with implementation and ultimately seeking to implement what the SDF seeks to achieve. The municipality spends a great deal of time and energy in planning for infrastructure and land development and is therefore encouraged to commit to its plan and drive it to implementation. This will inevitably result in 'unpopular' or 'difficult' decisions, or pressure being placed on the municipality to unlock development opportunities that do not align with the spatial vision for the municipality or the intent. However, it is critical that the municipality acts in the public interest and in line with national, provincial and municipal policy intent to improve municipal financial sustainability, promote intensification and densification or land use, desist from urban sprawl and desist from reinforcing apartheid planning legacies through its land use management and development decision making.</p> <p>New lifestyle estates, residential estate or small holding estates in rural (agricultural) areas.</p> <p>In terms of the Provincial Spatial Development Framework and the Western Cape Government's Rural Land Use Planning Guidelines, this Department does not, in the strongest possible terms, support new lifestyle residential or small holding estates in agricultural areas what would constitute the development of an entirely new settlement, specifically when these new settlements are very close to existing towns where residential opportunities, services and facilities exist and the establishment of new residential opportunities in rural areas essentially</p>	<p>The George MSDF aligns with this position. This additional guidance is noted.</p>
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		<p>constitute ‘leap frog development’ and a form of urban sprawl. Any new residential opportunities must be connected to existing settlements, settlement infrastructure, and services. The Garden Route is a place of great scenic and landscape beauty and has the potential to be systematically eroded by inappropriate development typologies in agricultural or wilderness landscape areas outside of established settlements. In addition to this, development that does not functionally connect to the existing settlements serves to undermine the investment in infrastructure, services and facilities that the municipality undertakes in existing settlement, exacerbating the apartheid spatial planning legacies and work against the Spatial Planning and Land Use Management Act 2013 (Act 16 of 2013) development principles of spatial justice, spatial sustainability, efficiency and spatial resilience. New residential nodes in the rural landscape must be prevented due to municipal efficiency and opportunity costs to deliver services to scattered small nodes versus providing the same services in a central urban area. The establishment of new settlements can only be justified in exceptional circumstances (i.e. when there are compelling reasons not to use existing settlements). Each case will need to be carefully evaluated on its merits. In light of the substantial cost of establishing and maintaining new settlements and fiscal constraints confronting municipalities, the establishment of new settlements is not encouraged. The preferred approach is to make optimum use of existing public investment in established settlements.</p> <p>As an alternative to agri workers settling in existing settlements, in certain cases the agri-village option may be applicable. An agri-village is a privately established and managed settlement situated on private land within a farming area and exclusively accommodates the local agri worker community. The only circumstances under which an agri-village should be considered include the following:</p>	
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	<ul style="list-style-type: none"> • in a farming area where there is a concentration of agri workers due to the type of agricultural activities and that has a substantial demand for “off-the-farm” settlement; • areas where there are no established settlements within practical commuting distance (approximately 30km) and a municipality that has no feasible means of establishing and managing a new town; • In light of the substantial managerial and financial resources required to establish and maintain small settlements, and their potential negative impact on the environment and also due to the relatively short distance between settlements in the Western Cape, the establishment of agri-villages or new settlements as “off-the-farm” options both have limited applicability in the Western Cape. <p>The provincial approach is to prevent further development of extensive residential lifestyle properties (i.e. smallholdings) in the rural landscape. New smallholdings can be established on suitable land on the urban fringe.</p> <p>Herold’s Bay It is understood that the municipality is experiencing development pressure in Herold’s Bay, specifically between the existing settlement of Herold’s Bay and Oubaai estate. It is recommended that the municipality ensure the future LSDF for the area responds to this pressure to ensure future development responds to national, provincial and municipal planning policy, and responds to a logical structure and framework for development to prevent undesirable development typologies and outcomes (such as ‘security estate’ type development filling in an area that the municipality could have better planned for.</p> <p>The character, feel and future of the Eastern gateway to George and Gateway to Wilderness (Kraaibosch South).</p>	Noted.
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	<p>Stronger guidance required for the ‘eastern gateway’ to George. The previous SDF went to some length to try to unpack the character and feel desired in this area, and its function. It is clear that this area is under immense development pressure, and comprehensive local level planning is therefore required for this area in order that it is not ‘let go’ to ad hoc development applications that have the potential to erode the intended ‘gateway’ status of this area.</p> <p>Garden Route Dam Not all of the area to the south of the garden route dam is appropriate for urban development, but rather more appropriate for special consideration for unique development opportunities. The municipality needs to give some thought to how development takes place here so as to not privatise or lose this asset, and perhaps even enhance the development and recreational opportunities that exist here. Cognisance must be taken of the outcomes of the recent Environmental Impact Assessment that was undertaken for this area.</p> <p>Development pressure to the south-east of Thembalethu Cognizance is taken of the medium to long term development pressure that exists on the farms to the south-east of Thembalethu towards the coast. Urban expansion in this area should be strongly discouraged and rather redirected towards the existing areas in the greater George city area that align with the policy objectives to intensify and densify the urban fabric and reinforce the public transport network that exists in the area. Just because government is the owner of this land, does not warrant its development and in fact alternative uses should be considered for this land, which honour the special sense of place of this area. There is a great deal of government-owned land within the existing and proposed urban edge of George that</p>	<p>Noted, the MSDF has been revised in this regard. Relevant content in the 2013 MSDF has been carried through into the reviewed MSDF. Further description and motivation for retaining the rural character of the eastern gateway has been included, note the conceptual difference between the eastern gateway to George and the priority Eastern Commercial node</p> <p>Noted, the MSDF has been revised in this regard.</p> <p>Noted, the George MSDF is aligned to this position.</p>
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		should be unlocked as a matter of priority for development opportunities to be taken up in the medium to long term.	
57.	Department of Agriculture, Forestry and Fisheries 98 (21/01/2019)	<p>The evaluation of the proposed urban edge boundaries was done in comparison with the <u>available demarcation of agricultural land as is defined within the Sub-division of Agricultural Land Act, 70 of 1970</u> (SALA) as well as the capability, suitability and potential of agricultural land, with specific reference to the proposed High potential agricultural areas for the Western Cape province. In addition, as SALA is based on the legislative status of a surveyed cadastre parcel (either farm or erven) DAFF is obliged to do the assessment of agricultural land based on the cadastre boundaries. DAFF can therefore not support a land parcel where an Urban edge cuts across the land parcel as, from a legislative perspective, a land parcel cannot have a dual status in terms of whether it is agricultural land or not</p>	<p>The DAFF's investigation into the capability, suitability and potential of agricultural land has not as yet been shared with other spheres of government.</p> <p>Comments were received after the closing date for comment and require a face to face, detailed engagement between the municipality and the DAFF that has not taken place to date in order to establish a practical way forward to achieve alignment and fully understand potential impacts of a chosen way forward. Where SALA is applicable, it is not possible to include or exclude large chunks of land from the urban edge simply on the basis of cadastre – this undermines good planning principles and could result in the undermining of the spatial development objectives set out from the NDP right through to the MSDF, in turn this would impact on a range of municipal planning and sustainability concerns.</p> <p>This is a matter experienced by several municipalities and should be resolved at a collective level between the national, provincial and municipal spheres. It is not possible for this to be resolved in time for the adoption of this MSDF while fully understanding the impact. This matter is noted as an outstanding matter requiring further work.</p>

Summary of Stakeholder Inputs on Notification of the Intention to the Amendment of the George SDF (2013)

Summary of comments received in response to the George Municipality's Request for Comment: Amendment of the Municipal Spatial Development Framework for George issued in terms of SPLUMA and the Municipality's Land Use Planning Bylaw on 21 November 2016 and the Municipality's preliminary responses thereto:

#	Organisation/Institution/Person	Summary of Comments Received	Response
58.	Mountview Resort & Lifestyle Village 2016/12/05	<ol style="list-style-type: none"> 1) Unnecessary to shift the urban edge 2) Adequate properties available in the urban edge to accommodate new development 3) Respondent has 16ha of business property available for development 	<ol style="list-style-type: none"> 1) The reviewed draft SDF does not, in principle support any changes to the urban edge. 2) The need to prioritise the development of the extensive vacant and underutilised land within the urban edge is highlighted in the draft SDF
59.	SANPARKS 92 2017/01/20	<ol style="list-style-type: none"> 1) Portions of the Garden Route National Park and buffer zone are located in the GM area. 2) Conservation areas should be mapped 3) Guidelines for management of high biodiversity land 4) Update CBD layer, CBA's to be kept natural 5) Increased awareness of view-shed protection to be instilled 6) Address risk infrastructure in high hazard zones and govern land use in these zones so as not to enhance its nature 7) Consult EDM Sea Level Rise and Flood Hazard Risk Assessment report 8) Map high risk fire area and define roles and responsibilities 9) Promote green job creation in collaboration with SANPARKS 	<ol style="list-style-type: none"> 1) Updated Critical Biodiversity Area mapping included in the draft SDF 2) View sheds, risk areas and high biodiversity areas are identified, and policy guidelines provided to manage development in relation to these 3) SDF rationale for conservation and risk management interventions strengthened 4) Policy guidelines provided for managing high risk infrastructure and land use in relation to hazard zones are provided. 5) Draft Coastal Management Line included in the SDF along with associated policy guidelines. 6) High risk fire areas mapped. Policy guidelines limited to the purpose of an SDF. Broader roles and responsibilities are the function of the Municipality's Disaster Risk Management Plan. 7) Green job creation is not the function of the MSDF.
60.	Victor and Partners (Fantique Trade 853(Pty)Ltd) No. 38 2017/01/26	<ol style="list-style-type: none"> 1) The current SDF does not make adequate provision for development in rural areas. 2) Visions and goals of the SDF not adequately aligned with Council (?), Government and current legislation 	<ol style="list-style-type: none"> 1) Vision and goals are aligned to national policy and legislative directives 2) The draft MSDF supports appropriate development in rural areas that does not compromise but reinforces the integrity of the rural landscape or the rural economy.

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#	Organisation/Institution/Person	Summary of Comments Received	Response
		<ul style="list-style-type: none"> 3) SDF undermines rural communities, stifles job creation which consequently threatens food security and increases vulnerability of farming labour force 4) Need for rural node at Sinksabrug 5) Develop precinct plans for rural nodes 	<ul style="list-style-type: none"> 3) The approach to rural development in the draft MSDF was workshopped with the National Department of Rural Development and Land Reform, the Western Cape Provincial Government's (WCPG) Departments of Human Settlements, Agriculture and Environmental Affairs and Development Planning. 4) The settlement hierarchy has been reviewed and is confirmed in the draft MSDF 5) Detailed studies into each of settlement is beyond the scope of this MSDF review and not a requirement of SPLUMA 6) Plans focussed on rural areas were however recently prepared: the Rural Development Plan (2017) and the LSDF for Wards 24 and 25 (2016) and led the content of the draft reviewed MSDF in respect of the rural areas of the Greater George Area. 7) The MSDF is not opposed to sustainable and appropriate settlement of rural dwellers in a rural environment – there are a number of government programmes in place to support these households. 8) New settlement of an urban nature outside of existing serviced nodes is unaffordable for the George Municipality and Western Cape Government in terms of the construction and operation of services and facilities to which such settlements would be entitled. Both the Municipality and Western Cape Government are dealing with backlogs in service delivery to existing settlements and ensuring that existing services are resilient to resource scarcity. 9) Sinksabrug is 16km from the George city area. A node of an essentially urban nature in this location is not supported. There is extensive, available, under-utilised industrial and residential land within the George city area. 10) Agricultural processing activities in the Sinksabrug area will be considered within the ambit of current land use rights and provisions should an application in terms of the Municipal Planning By-Law be made. Should there be site specific reasons that can be demonstrated in a land development application to be aligned with the principles of SPLUMA and justifies a departure from these

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#	Organisation/Institution/Person	Summary of Comments Received	Response
			<p>provisions, these will be considered if it is illustrated that it would promote the objectives and strategies of the SDF.</p> <p>11) The Sinksabrug Development Proposal as it stands, is anticipated to place a significant expectation on the Municipality's resources (capital and operating) – these should be fully quantified in terms of the requirements set out in Annexure 5 of the draft reviewed MSDF. An informed decision regarding this proposal will have to be supported by a thorough cost – benefit analysis, environmental impact assessment and an assessment of the impact of such a proposal on the surrounding rural landscape and economy. The municipality has an obligation to consider the impact of such a settlement on the Capital Expenditure Framework and budget and the opportunity cost of investing the same resources elsewhere.</p> <p>12) Precinct plans are beyond the ambit of a MSDF</p>
61.	Delplan 93 2017/01/30	<p>1) Develop guidelines for accommodation of residential opportunities in rural nodes</p> <p>2) Similar comments as per no 3 above</p>	<p>Refer to 3 above. Urban development in rural areas is not supported in terms of government policy. Amenities and infrastructure across the span of George's rural landscape are too diverse to set generalised guidelines of this nature. Given the mandate of the WCPG on rural land as specified in terms of LUPA, it is prudent to revert to the WCPG: Rural Development Guidelines to evaluate the merit of a proposal. Proposals will be measured against the guidelines from the Growth Proposals Assessment Framework contained in the amended MSDF.</p>
62.	Delplan 93 2017/01/30	<p>1) Erf 25541 is an Industrial zoned erf, yet excluded from the SDF</p> <p>2) Proposal for reconsideration of the urban edge alignment in this affected area</p>	<p>1) The initial draft documents prior to the adoption of the SDF in 2013 did include this area into the urban edge of George, however after scrutiny of the BESP requirements and calculation of the spatial budget for George it was resolved to exclude certain parcels of land formerly included in order to promote intensification of land uses within the urban edge through development of strategic vacant and under-utilised land within the urban edge.</p> <p>2) The achievement of SPLUMA and SDF objectives can be spearheaded through maintaining a tight urban edge</p> <p>3) The latest spatial budget projection shows that there is still ample vacant and under-utilised business and residential opportunities</p>

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#	Organisation/Institution/Person	Summary of Comments Received	Response
			<p>within the urban edge to accommodate new development at least within the medium term.</p> <p>4) Land uses that can contribute to tourism development and are extensive in nature are promoted in terms of the Draft Victoria Bay LSDF and need not be included in the urban edge to be accommodated as the latter is considered to be compatible with the peri-urban context of the area.</p>
63.	<p>Department of Agriculture Forestry & Fisheries 94</p> <p>2017/02/23</p>	<p>1) Map forest complexes, fire breaks and protected areas</p> <p>2) Address sustainable forest development principles relative to the SDF</p> <p>3) Address need for biodiversity and environmental sensitivity overlay zones</p> <p>4) Land is being re-commissioned to forestry</p>	<p>1) Mapping has been updated. It is not possible to capture fire breaks at the scale of a MSDF.</p> <p>2) An asset protection overlay zone is proposed to support the mitigation of veldfire risk.</p> <p>3) A risk-based overlay zone to manage coastal sensitivities is recommended in the MSDF.</p> <p>4) Ground-truthing of biodiversity resources is required to inform the necessity and delineation of an overlay zone. This was beyond the scope of the MSDF to ascertain.</p> <p>5) The latest biodiversity data has been integrated into the SDF and informs allocation of future land uses and boundaries for urban expansion. The same biodiversity data was used in the determination of zonings in the latest integrated zoning scheme by-law for George and protected natural areas and CBA's were afforded a zoning appropriate to its status.</p>
64.	<p>Cape Nature 91</p> <p>2017/03/31</p>	<p>1) Update in respect of WC Biodiversity Sector Plan required</p> <p>2) CBA layers to be overlaid with cadastral layers of the SDF</p> <p>3) Indicate how George border the CapeNature and national reserves</p> <p>4) Indicate when George open space network plan will be updated</p> <p>5) Address fire regime and alien plan infestation</p> <p>6) Align with forestry exist plan</p>	<p>1) Updated critical biodiversity area (CBA) information used in the review of the MSDF</p> <p>2) Conservation areas and categories are identified in the amended MSDF</p> <p>3) The desired open space network is identified in the amended MSDF</p> <p>4) Fire regime and alien infestation planning is beyond the scope of a MSDF however, where appropriate policy guidelines on land use management to support disaster risk mitigation are identified.</p>
65.	<p>Spatial Planning: Department of</p>	<p>1) Population, Housing and economic estimates – The population figures need to be updated and the population</p>	<ul style="list-style-type: none"> Population figures and projections have been updated

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	<p>Environmental Affairs & Development Planning, Western Cape Government 97</p> <p>2016/03/08</p>	<p>growth estimates for the next five years should be included during the amendment of the SDF. Based on the current population figures and projections the SDF should include the demand for housing units across different socio-economic categories and the planned location and density of future housing developments, together with the requisite facilities and open space provision. The SDF must further include estimates of economic activity and employment trends and locations in the municipal area for the next five years.</p> <p>2) The George SDF must also identify, quantify and provide locational requirements of engineering infrastructure and services provision for existing and future development needs for the next five years.</p> <p>3) The SDF should further include a strategic assessment of environmental impacts and opportunities within the municipal area, including the location of environmental sensitivities, high potential agricultural land and coastal strips, where applicable.</p> <p>4) The planned capital expenditure should be depicted spatially and the SDF must indicate areas of priority intervention and spending within the municipal area for the next five years.</p> <p>5) Although the SDF has an implementation plan in place, it is critically important that the implementation plan is not only supported, "as indicated", by local area Spatial Development Plans, Spatial Planning and Land Use Management Policies, but also by all sector plans and policies of the George Municipality for the next five years. Additionally, the SDF must provide a spatial expression of sector plans of the municipal departments. The implementation plan should thus include the following: sectoral requirements, including budgets and resources for implementation; necessary amendments to the land use scheme / zoning scheme; specification of institutional arrangements necessary for implementation; specification of implementation targets, including dates and monitoring</p>	<ul style="list-style-type: none"> • Verifiable information is not available on the demand for housing products across the different -economic categories and is beyond the scope of this project to compile. The planned location of housing developments is identified. • Economic activity trends are identified • Engineering infrastructure investment priorities are identified spanning a 5 year time horizon considering available resources at the Municipality's disposal. • A strategic assessment of environmental issues within the municipal area to inform the amendment of the SDF is included in the Status Quo report. The location of environmental sensitivities is identified, as well as high potential agricultural land and the coastal management area and access points. • Planned capital expenditure is identified. Areas of priority intervention and spending within the municipal area for the next five years are identified and mapped. • The amended MSDF identified sector plans impacting on or impacted by the MSDF and recommends actions to align these plans with the MSDF. Most of these plans are under review providing an important opportunity for alignment. For this reason, however, it did not make sense to map the sector plans. The MSDF maps do however provide direction to the review of the sector plans.

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		<p>indicators; and specifications, where necessary, of any arrangements for partnerships in the implementation process.</p> <p>6) Upon the amendment of the existing SDF, the municipality must ensure vertical alignment and that it complements and is aligned with the Provincial Spatial Development Framework, 2014 and the Provincial Strategic Plan 2014 – 2019 and the changed national, provincial and municipal policy environment.</p> <p>7) The existing SDF does not currently speak to the issue of horizontal alignment between municipalities sharing common boundaries with it. The municipality will therefore be required to ensure that the amended SDF is aligned with spatial development frameworks reflected in the IDPs of neighbouring municipalities. To this end the municipality should ensure that proposals, particularly those with cross-border implications, such as the proposals for a garden route brand and the conservation areas that abut/extend to neighbouring municipalities are included in the SDF.</p> <p>8) The status of a SDF as set out in SPLUMA must be incorporated in the SDF document as this has various implications, particularly, on the municipal land development decision-making authorities. Section 22 of the said act stipulates that a Municipal Planning Tribunal or any other authority mandated to make a land development decision in terms of this Act, may not make a decision which is inconsistent with a municipal spatial development framework unless site-specific circumstance exist to justify deviation from such a municipal spatial development framework. The policy proposals of the SDF are therefore critical in their wording and framing to prevent unintended consequences.</p> <p>9) Time Frame of a Municipal Spatial Development Framework - in order to be consistent with SPUMA, it is suggested that the planning horizon for the George MSDF should be 20 years and not 25 years as indicated.</p>	<ul style="list-style-type: none"> • It is acknowledged that the amended MSDF's Implementation Plan requires further development on the basis of the support for the proposals contained in the MSDF prior to approval. • A review of national and provincial policy and legislative directives was undertaken at the outset of the review of the MSDF to ensure alignment in the development of strategies, policies and policy guidelines. • The amended MSDF is considered to be aligned with neighbouring municipal plans and the Eden District MSDF. Critical alignment issues were identified in the Status Quo phase and carried through into the strategies, policies and policy guidelines presented. • Noted. The status of the MSDF is included in the amended MSDF as required. It is proposed that guidance for considering site specific circumstances are appended to the MSDF submitted for approval. • Implemented

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		<p>10) Municipal Vision and Mission – it is anticipated that the new Council will adopt a new Vision for the Municipality for the next five years or make certain adjustments to their IDP Vision for the Municipality in order to accommodate changing circumstances. This section should therefore be aligned with the new generation IDP Vision for the municipality. The municipal SDF should further be guided by the SPLUMA development principles amongst other things.</p> <p>11) The reference to the National Development Plan Vision 2040 is not correct, as it should be referring to the NDP Vision, 2030.</p> <p>12) Enhancing the Regional and Local Space Economy - It must be noted the department is currently in the process of developing a Southern Cape Regional Spatial Implementation Framework and that the Eden District Municipality is currently reviewing the existing Eden SDF. The municipality must therefore ensure that the George SDF is brought into alignment with the aforementioned Spatial Development Frameworks.</p> <p>13) Certain areas within the Eastern and Western Gateways are earmarked for long term development opportunity areas and these areas fall outside delineated urban edge. For clarity and certainty purposes, it suggested that an approximate time frame must be linked to what is meant by the term long term. A greater degree of clarity of development intention must be provided on all George SDF maps, so that there is no ambiguity of the growth path of the municipality.</p> <p>14) Housing, Social and Public Facilities – The municipality should consider and promote the clustering of social and public facilities in all human settlement projects and as far as possible ensure that such facilities are situated in close proximity to major nodes and public transport routes.</p> <p>15) City-Wide Open Space System for George and Critical Biodiversity Areas should be informed by the new CBA map (beta version) which was officially launched by CapeNature</p>	<ul style="list-style-type: none"> • Noted, the SPLUMA principles have guided the review from the outset. The Municipal Vision and Mission is included in the amended MSDF and the proposed spatial vision is aligned to this. • Correction implemented • Implemented • Implemented • The amended MSDF promotes this policy position • The updated CBA data was obtained for the review of the MSDF.

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		<p>during 2016. It is thus noted that the CBA data used is not the most up-to-date data available.</p> <p>16) Enhance the Rural Character and Livelihood –the municipality must ensure that the general policy guidelines for the management of rural landscapes also incorporate and takes cognisance of the Eden Rural Development Plan currently being developed by the Department of Rural Development and Land Reform, as well as develop a policy position of its more rural settlements and what would be deemed appropriate and inappropriate in terms of growth and development.</p> <p>17) The current George SDF, 2013 is not clear in terms of whether the Destiny Africa development falls within or outside the designated Urban Edge. In <u>diagrams 5</u> and <u>7</u> the development area appears to fall outside the delineated urban edges while in <u>Map 5</u> titled urban edge, when one looks at the legend, it appears that there is an urban edge for Destiny Africa and a separate urban edge for the rest of George. The urban edge line and colour however on the map appears the same for Destiny Africa and the rest of George. This creates a degree of confusion.</p>	<ul style="list-style-type: none"> • The Western Cape Government’s Rural Development Guidelines are references and annexured to the amended MSDF. A settlement hierarchy is confirmed in the amended MSDF and a clear position is provided with regard to rural settlement. The Rural Development Plan prepared by the Department of Rural Development and Land Reform is referenced in the MSDF and has informed the review of the MSDF • The circumstances surrounding the Destiny Africa site are clarified in the amended MSDF as is the status of this site going forward and expectations of its development should it proceed.
66.	<p>Department of Rural Development and Land Reform (DRD&LR) 96</p> <p>2015/09/18</p>	<ol style="list-style-type: none"> 1) Include a public participation report as an annex to the SDF. 2) Include a summary of key national policies and directives in the SDF review and unpack how these affects spatial planning and land use. 3) Provide a summary clarifying the provincial development agenda that the MSDF needs to align with as articulated in the provincial growth and development strategy, PSDF, Strategic objectives, MTREF and other provincial policy documents. 4) Provide a summary of the key district policies and plans affecting the spatial planning and land use within the municipality. 	<ol style="list-style-type: none"> 1) This summary of comments and responses to the George Municipality’s notice of intent to amend the SDF is part of the public participation report which will be concluded following the public participation process. 2) The DRD&LR’s comments are consistent with the DRD&LR’s SDF Guidelines which have been followed to the extent possible and appropriate within the scope of this SDF Review. The SPLUMA requirements of a MSDF have largely been met in this amended MSDF. Refer to responses to the comments received from the Western Cape Government above.

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		<p>5) Elaborate on SPLUMA and the guiding principles in chapter 2 and apply the 5 principles to the spatial argument of the SDF.</p> <p>6) Unpack and map the SDF vision statement.</p> <p>7) Unpack municipal sector plans and incorporate into spatial argument.</p> <p>8) Include spatial mapping of the following;</p> <ul style="list-style-type: none"> a. Coastal management and access, b. Agriculture activities, c. DRDLR projects, d. Economic resources (forestry, minerals, agriculture and tourism), e. Socio-economic analysis, f. Reform initiative, g. Priority interventions, h. Composite mapping (focus on the integration and trade-offs of all sectors and policies in the SDF review). <p>9) Include a SWOT analysis of economic sectors to inform spatial argument.</p> <p>10) Summarise and map key built environment challenge areas and include the rural conceptual framework, indicating green infrastructure provision.</p> <p>11) Engineering services and infrastructural provisions must be identified, quantified and located for existing and future developments.</p> <p>12) Update the socio-economic data and future projections including previously disadvantaged areas, areas under traditional leadership, rural areas, informal settlements, slums and land holdings of SOE and government agencies and address their inclusion and integration into the spatial, economic, social and environmental objective of the relevant sphere.</p>	

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		<ul style="list-style-type: none"> 13) Include a conceptual framework for urban nodes, including the spatial implications of bulk infrastructure. 14) Identify, quantify and give locational requirements for engineering, infrastructure and service provision for existing and future development for the next 5 years. 15) Identify areas in need of more detailed plans. 16) Include and unpack a 10-20-year vision for the George municipality 17) Properly reference supporting policies and strategies throughout the document. 18) Make links between LUMS and spatial planning and include supporting land use management into the implementation framework. 19) The capital investment framework needs to include a budget and resources for implementation in the SDF, including, a framework indicating project description, prioritisation, required authorisations, implementing agents, timeframes, budgets and targets. 20) Include a structured budget and specify any arrangements for partnerships in the implementation process 21) Make the necessary amendments to the land use management scheme and include detailed framework. 	
67.	<p>Planning Partners on behalf of Magnolia Ridge Properties No .21 (3 December 2018)</p> <p>2017/09/26</p>	<ul style="list-style-type: none"> 1) Magnolia Ridge Properties request fresh consideration of the George Urban Edge in the revised SDF; <ul style="list-style-type: none"> a. The area is in line with DEA&DP's 2009 Settlement Restructuring: Explanatory Manual definition of land that should be included inside the urban edge. b. The sawmill site is zoned 'Industrial I' and will remain so unless a court overturns the zoning determination of the property is rezoned. c. The Urban edge was recommended by BESP professionals in 2010 and included all of the MRP land, it is an oversight that this was excluded in the 2013 SDF. 	<ul style="list-style-type: none"> 1) The extent of vacant and under-utilised commercial, industrial and residential land within the urban edge makes it difficult to defend the extension of the urban edge to include this site. 2) The existing rights of the property is limited to a sawmill in terms of the original zoning determination and is classified as a non-conforming land use. 3) While the inclusion of the site was a consideration at one stage, it is noteworthy that the site was not part of the interim urban edge, delineated in 2006 due to vast parcels of vacant and under-utilised land within this area. 4) At the time that the final urban edge delineation was decided in 2011 there still remained a considerable amount of land within

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		<ul style="list-style-type: none"> d. The area has been serviced and there is a willingness from developers to invest in the area. e. There is an existing service agreement between the George Municipality and Mr de. Kock signed in 2008 and further addenda between 2009 and 2011. Bulk services and public road systems have been upgraded. f. The George Roads Master Plan indicates that in the future the MRP land will be surrounded by high order public roads and it is believed that the land is not part of the rural area but part of the urban structure of George g. The development of this land does not over extend municipal infrastructure and is warranted to make efficient use of infrastructure investments. h. The area provides a logical 'rounding-off' for urban development as opposed to rural development. i. The land is not viable agricultural land j. MRP has work co-operatively with the George Municipality to achieve economic development and in good faith has entered into legal agreements and has constructed bulk infrastructure. Inclusion of the MRP land inside the urban edge will demonstrate that the Municipality is serious about its commitments. 	<p>the Kraaibosch area, earmarked for a mix of residential and commercial purposes, that was un-developed, hence a 25 year development horizon was placed on the area to allow for infill development to occur within the urban edge, which will contribute to the definition of the development context of the MRP sites in a manner that will not undermine the objectives of the SDF.</p> <p>5) A 'logical rounding off of the urban edge' may only be justified if the rights approved for the Destiny Africa site are vested. The concept of rounding off an urban edge is however not addressed in the principles of SPLUMA and does not testify to a strategic approach to urban restructuring and spatial transformation.</p> <p>6) A departure from the MSDF on the basis of site specific circumstances will be considered on the basis of the following principles:</p> <ul style="list-style-type: none"> ○ The use of this land for activities that realise the potential of the site as a significant gateway precinct to the George city area will be considered but would need to be in keeping with the Garden Route lifestyle identity of region. Uses should not compete with the Eastern Commercial Node or the George CBD and be supported by a market study. ○ The development of the site will optimise existing infrastructure capacities in this area ○ Proposals for the precinct should be framed within a clear density and urban design framework ○ This framework and the proposals should complement the proposals and guidance contained in the Victoria Bay LSDF.
68.	Department of Human Settlements, Western Cape Government 95 2017/02/14	1) Request to include Farm 197 in the urban edge on the basis of a technical opinion that a water use license would not be obtained for the cultivation of this land.	<p>1) The amended MSDF does not support this request.</p> <p>2) The opinion that a water use license may not be obtainable for the farming of the land does not equate to an inability to secure water for the cultivation of the land.</p>

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		<p>2) The development of the site is proposed to include low income, affordable market housing opportunities, business, commercial and light industrial development</p> <p>3) No services are available for the development of this land. The proposal is that private sector funding would be leveraged to develop bulk and reticulation services to meet the demand of the project.</p>	<p>3) However, this would not be a reason to permit the conversion of this land for urban use or to see this as desirable.</p> <p>4) It is proposed that the land could be used for other purposes to the benefit of the community that are suitable to the current designation of the land and may result in permanent job creation, taking advantage of the unique quality and location of the site.</p> <p>5) The Department of Human Settlements has access to a number of well- located parcels of land within the urban edge that could be developed for human settlements that will reduce the cost of infrastructure, bring poor families closer to and integrate them with existing economic, social and transport facilities, services, amenities and opportunities.</p> <p>6) Development patterns over the last 5 years indicate very few industrial development applications. Economic trend data indicates that the George economy is moving away from this sector. At the same time, there are extensive tracts of serviced, vacant industrial and commercial land within the urban edge of George, within established areas identified as priority investment nodes and serviced by public transport. The likelihood of such investment being attracted to this site and financing the infrastructure is therefore poor.</p> <p>7) The development of this site would therefore quite likely result in residential use only, exacerbating the inefficient and apartheid spatial form of George and perpetuating the isolated nature of communities living in state-subsidised housing projects.</p> <p>8) This request does not align with the Western Cape Government's Living Cape Framework (October 2017)</p> <p>9) The George Municipality has modelled the fiscal impact of the development of this site compared to a publicly owned centrally located site which concludes that the costs of being located on this site will be borne by resident households and businesses at double the cost of being located on the centrally located site. The Municipality will also make a loss on the development of this site which is a key cause for concern given the municipal financial</p>

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			<p>sustainability concerns faced by the Municipality and discussed in the amended MSDF.</p> <p>10) In addition to rigorous consideration of state owned land within the urban edge, it is recommended that the Department of Human Settlements consider the Destiny Africa site for mixed income residential development inclusive of state-subsidised housing opportunities and engage with the landowners accordingly.</p> <p>11) It is also recommended that the Department undertake a verification of the waiting list and prepare a profile of households on the waiting list in order to match demand with an appropriate housing product and location. This is discussed further in section 5.1.2.2 of the amended MSDF.</p>
69.	Nel & de Kock Town and Regional Planners No. 86 (5 March 2018)	1) Notice of intent to apply for urban edge amendment to include portion of Portion 7 of Farm Buffelsfontein No 2014 Herolds Bay for urban development purposes.	<p>1) Insufficient information is available to review the urban edge in this location at present.</p> <p>2) It is recognised that an extension to the urban development area at and contiguous to Herolds Bay may bring needed retail services to Herolds Bay, alleviate seasonal traffic congestion through the provision of remote parking facilities and assist with funding the provision of shuttle services and safe, dedicated non-motorised transport improvements into Herolds Bay and to the beach area for the general public. These needs will be key considerations in the deliberation of such a proposal.</p>
70.	Heritage Western Cape 88 2017/03/17 2018/04/18	<p>1) Delineation of Heritage Protection Zones must comply with NHRA</p> <p>2) Heritage related aspects must be incorporated into the SDF and approved by HWC</p>	<p>1) The amended MSDF contains policy directives regarding heritage asset management.</p> <p>2) A map of known heritage resources and cultural landscapes is included in the MSDF.</p> <p>3) The cooperation from local heritage bodies have been sought in the development of the above, however inputs are being still awaited and will be integrated in the final maps.</p> <p>4) Any inputs, resources or information regarding areas that need to be delineated as heritage protection areas will be welcomed.</p>

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71.	Gerrit Coetzee: Physical Resource Planning and Property Management (WCED (No. 99)	<p>Policy A: Prioritise infrastructure that invests in people and their socio-economic mobility and resilience</p> <p>The department recommends the development of guidelines/ interventions and a proactive response to informality in George's urban areas with consideration of need for and access to social facilities.</p> <p>The GM to continue working toward cost-efficient intergovernmental mechanisms of land acquisition/transfer, long term lease agreements and temporary use arrangements between provincial government and the relevant George Municipal sector departments which should be considered as a component of the implementation framework, to facilitate service delivery.</p> <p>Give consideration to the implementation sequence of the WCED's budget, to ensure acquired school sites are timeously available.</p> <p>All residential-led development proposals be circulated to both the Department of Transport and Public works (Directorate: Immovable Asset Management) as well as WCED.</p>	This proposal to improve inter-governmental coordination between the Municipality, the Dept of Public Works and the WCED is welcome and will be taken up with relevant units within the Municipality to operationalise.
	Gerrit Coetzee: Physical Resource Planning and Property Management(WCED)	<p>Policy C: Maintain a compact settlement form to achieve better efficiency in service delivery and resource use, and to facilitate inclusion and integration. Consultation with the WCED to discuss capacity at current sites. In Public Transport Priority Nodes and corridor, absorbing additional learners potentially translates into the expansion of schools and need to be planned for and included in the budget, where possible.</p>	Noted. It is also noted that existing school sites are under-utilised and the MSDF does not propose densifying these sites with residential use but rather protecting them for use by the WCED where expansion is needed. It is also noted that the implementation of the public transport system in George will allow better, affordable access to a range of schools across the city area within short distances.
	Gerrit Coetzee: Physical Resource Planning and Property Management (WCED)	<p>Comments pertaining to the content and maps included in the MSDF –</p> <ul style="list-style-type: none"> Spatial Concept: A spatial depiction of these 3 elements underpinning the SDF will be useful Figure 12: comparison (before & after approach) would contextualise progress thus far. Evaluate existing educational infrastructure with regards to George's NMT networks as part of the recognition to enhance 	<p>Noted, in the case of George the proposal is to protect existing school sites for expansion of schools to cater for growth via densification and intensification of land uses.</p> <p>The MSDF proposes a more detailed planning of the NMT network for the George city area in its Comprehensive Integrated Transport Plan. The importance of designing this network to support safe and easy</p>

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		<p>accessibility linking deprived areas to quality social facilities</p> <ul style="list-style-type: none"> Map 11: alignment/interaction between public transport and the open spaces which people frequent. Map 15: focus on key initiatives within the municipality which may be considered a catalyst for smaller projects within a given area (Map 16: better contextualisation of the challenges related to subsidised housing needed. Table 13: Education projects requires updating. 	<p>access to schools by learners and other facilities by communities is supported.</p> <p>The integration of the Public Transport, Non-motorised transport networks and the open space networks is supported by the MSDF and further work in this regard is proposed. A detailed social facilities study has been done for the Municipality and can be an input into whether additional facilities are needed and whether they can appropriately be located within or alongside the open space network within the more detailed study recommended in the MSDF.</p>
	Gerrit Coetzee: Physical Resource Planning and Property Management (WCED)	<ul style="list-style-type: none"> General observations pertain to spatial depiction at the introduction illustrating urban growth till date, more emphasis could be placed on the “WHERE”, “HOW” and “WHEN” in terms of implementation, improve legibility, identify pressure points and resultant interventions, infrastructure constraints. Policies A-H: Improve navigation through policies. Include a map of land owned by the municipality and the envisioned land use for these sites Response to drought 	<p>This is contained in the Status Quo Report</p> <p>A summary of the policy statements is contained in the Executive Summary</p> <p>The strategic municipal owned sites are identified however the detailed vacant land audit is contained in a separate report and informs the MSDF.</p> <p>The MSDF highlights the strategic portions with potential to facilitate achievement of the desired outcomes identified in the MSDF overall.</p>
			<p>The argument for a resource resilient George is set out across the MSDF and is the primary reason for maintaining a compact settlement form, protecting river corridors, etc.</p>

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		<ul style="list-style-type: none"> Recommendations in respect of Capital expenditure framework 	<p>There are no known investment plans on the part of PRASA and Transnet. Eskom only applies to the rural areas and is dealt with in the Status Quo Report.</p> <p>The context of an intermediate municipality and guidelines have been offered for the compilation of a CEF for intermediate cities and these guidelines have been followed as far as possible within the scope of this review while noting that further work is needed which is highlighted in the Implementation Chapter. The capital expenditure framework is a work in progress.</p>