Remainders of Portions 59, 62 and 63 of the Farm Brakkloof Nr 443 Plettenberg Bay

PRELIMINARY TOWN PLANNING REPORT

(Prepared as part of the Draft Basic Assessment Report)

Planning Space

Town and Regional Planners

2/23/2026

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1. Introduction

Planning Space Garden Route Pty Ltd has been appointed by The NCH Trust to prepare a Town Planning Report to inform the Basic Assessment Report (BAR) to be submitted for Environmental Authorisation in terms of the National Environmental Management Act, 1998 (NEMA) in respect of listed activities that have been triggered by the planned development on the Remainders Portions 59, 62 and 63 of the Farm Brakkloof No. 443.

The purpose of this document is to report on the existing land use rights, opportunities and constraints on the property, and to assess the need and desirability of the project in terms of the planning policies and principles contained in National, Provincial, and Municipal Spatial Development Frameworks applicable to the area.

This report is intended as a **working document** to guide the client and project team during the early stages of project formulation. It will be refined as further information becomes available.

2. Property Information

2.1 LOCALITY

The subject properties are located to the south of Plettenberg Bay, within the Bitou Municipal Area, immediately to the south of the Whale Rock Residential Estate. The properties are accessed from Whale Rock Drive, which traverses the northern boundaries of the properties.

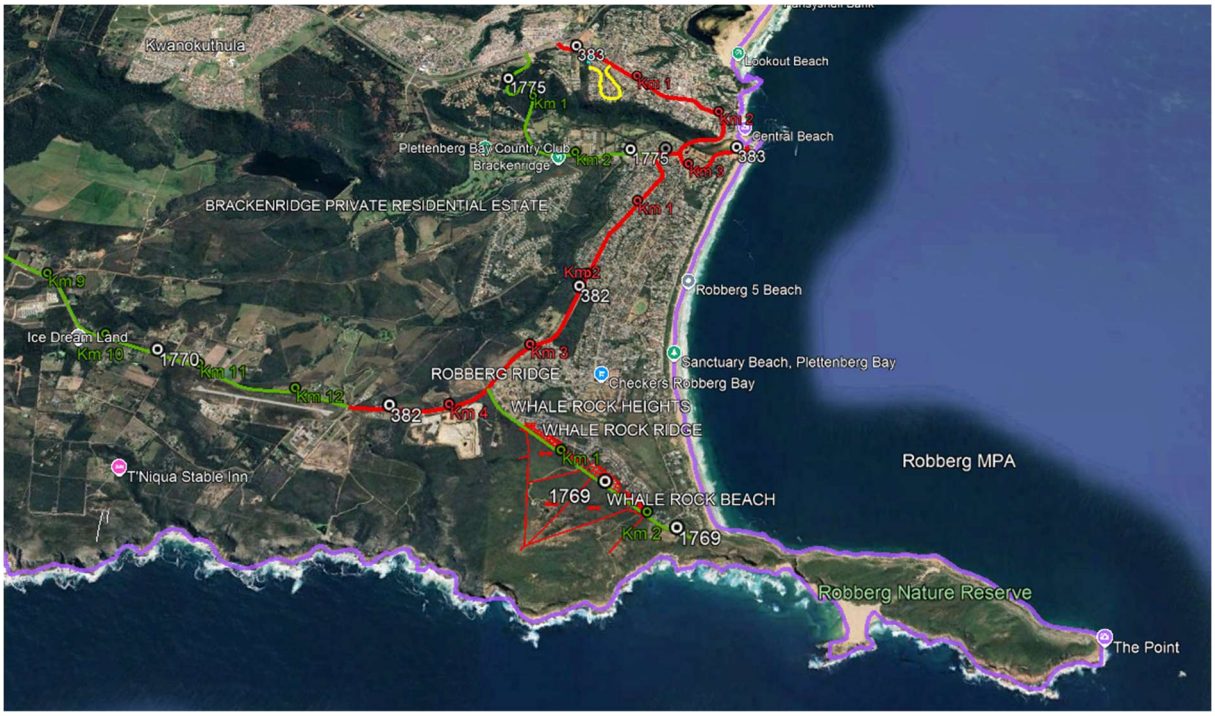


Figure 1: Locality

The surrounding area is characterised by high-value residential development to the north, and environmentally sensitive and undeveloped land, some of which forms part of the Robberg Coastal Corridor Protected Environment (including the Robberg Nature Reserve) to the south, east and west.

2.2 PROPERTY DESCRIPTION

Remainder of Portion 59 of the farm Brakkloof 443 in the Bitou Municipality and Administrative District of Knysna, Western Cape Province.	
21 Digit code	C03900000000044300059
Title Deed Number:	72789/2014
S.G. Diagram Nr:	S.G 727/1964
Title Deed Restrictions:	None
Servitudes:	None
Property Size:	13.2797
Property Owner:	The NCH Trust
Bonds:	None
Zoning:	Agriculture 1
Land Use	Vacant

Remainder of Portion 62 of the farm Brakkloof 443 in the Bitou Municipality and Administrative District of Knysna, Western Cape Province.	
21 Digit code	C03900000000044300062
Title Deed Number:	28304/2014
S.G. Diagram Nr:	S.G 6050/1997
Title Deed Restrictions:	None
Servitudes:	None
Property Size:	20.7822
Property Owner:	The NCH Trust
Bonds:	None
Zoning:	Agriculture 1
Land Use	Vacant/old quarry
Remainder of Portion 63 of the farm Brakkloof 443 in the Bitou Municipality and Administrative District of Knysna, Western Cape Province.	
21 Digit code	C03900000000044300063
Title Deed Number:	28304/2014
S.G. Diagram Nr:	S.G 6050/1997
Title Deed Restrictions:	None
Servitudes:	None
Property Size:	21.7177
Property Owner:	The NCH Trust
Bonds:	None
Zoning:	Agriculture 1
Land Use	Farmhouse and shed

2.3. BACKGROUND

Portion 59 was historically used in part for agricultural cultivation, while Portions 62 and 63 were previously disturbed through gravel extraction and the sourcing of road construction material. The current owners acquired the properties in 2014 and subsequently constructed a dwelling house with associated outbuildings on Portion 63. The previous owners, Shock Proof Investments 171 (Pty) Ltd, submitted a proposal in 2012 for a mixed-use housing development across Portions 59, 62 and 63 of Farm Brakkloof; however, the application was never finalised. An environmental authorisation process

was also initiated at the time, and a draft scoping report dated January 2010 was prepared as part of that process. This process was also not concluded.

Figure 2: Historical aerial image indicating farmland (Purple) and Quarry activity (Red)

3. Proposal

3.1 DEVELOPMENT CONCEPT

3.1.1 RETIREMENT VILLAGE

It is proposed to develop Portion 59 as an upmarket life-rights **Retirement Complex**, comprising approximately **121 residential units** with unit sizes ranging between **200 m² and 300 m²**, together with the associated internal road network, services, and communal facilities required to support the needs of retired residents. The retirement component is intentionally confined to Portion 59, as available specialist studies confirm that this portion has comparatively lower ecological and archaeological

sensitivity and contains previously disturbed areas (agricultural field) that are more suitable for development than the southern portions of the property.

3.1.2 CULTURAL AND TOURISM PRECINCT

Portions 62 and 63 are proposed to be rezoned from **Agriculture I** to **Open Space III (Nature Conservation)** and are in the process of being incorporated into the **Robberg Coastal Corridor**, thereby reinforcing long-term conservation, ecological connectivity, and landscape protection objectives. Within Portion 62, a cultural and tourism node is proposed, centred around the establishment of a world-class Museum of Mankind, supported by compatible tourist-oriented facilities for education, conferencing, a grass Amphitheatre and accommodation components. The overall development footprint is envisaged to comprise a series of smaller, dispersed building elements which will span over an area of approximately 12,000 m².

The Museum of mankind is envisaged as an interactive, experiential museum focusing on the origins and evolution of humankind, incorporating exhibition halls, theatres, and associated support facilities. Ancillary uses include a restaurant and deli with outdoor terraces overlooking the Robberg Nature reserve, a tourist retail component, administrative and reception areas, public amenities, and a conference or wedding venue. The landscape also lends itself to a natural amphitheatre overlooking the bay, where occasional concerts can be hosted. Limited short-term visitor accommodation, in the form of about 20 clustered self-catering units with shared recreational facilities, is proposed to support the cultural and tourism function of the precinct. Parking is largely accommodated through landscaped grassed areas located within previously disturbed portions of the site next to Whale Rock Drive. Overall, the development seeks to balance cultural enrichment, tourism, and environmental stewardship, aligning with the municipality's objectives of enabling appropriate rural investment while conserving the broader landscape character.

3.2 LAYOUT DESIGN CONSIDERATIONS

3.2.1 BIOPHYSICAL SITE CONSTRAINTS AND OPPORTUNITIES

The layout of the development is fundamentally shaped by the site's topography, vegetation patterns, and hydrological systems. The combined properties form a gently sloping bowl that descends toward

the coastline, creating a natural amphitheatre with outward views toward the ocean and the Robberg Nature Reserve. The Biophysical suitability of the site has been further described in par 4.2.1 below.

Preliminary studies did not indicate any particular sensitivities or no-go areas on Portion 59, and the entire portion has been identified as suitable for development. The decision was made to concentrate the residential component on Portion 59, leaving Portions 62 and 63 available as a consolidated natural area.

The layout of the residential component on Portion 59 has mainly been determined by the contours of the land. Roads and building platforms follow natural contours as far as possible to minimise earthworks, reduce visual scarring and maintain slope stability.

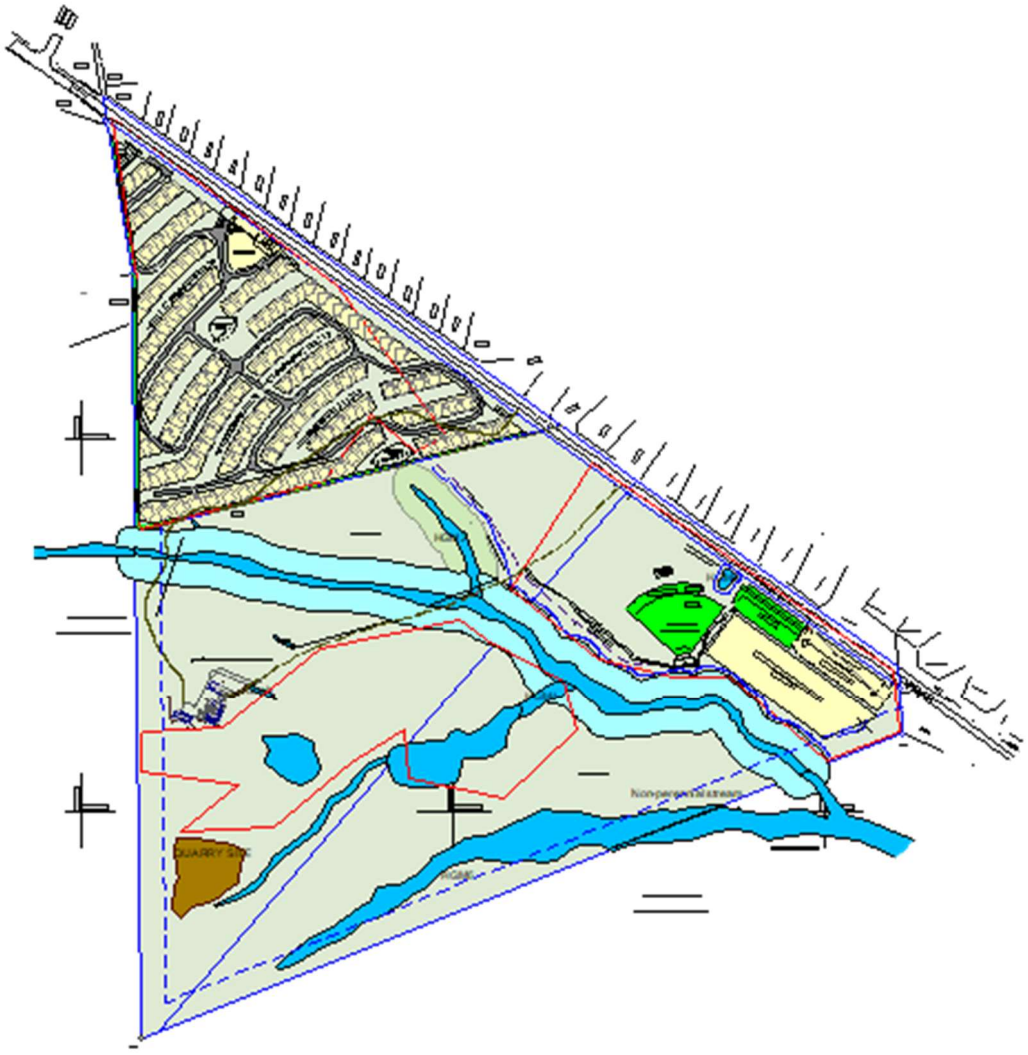


Figure 3: preliminary building footprint

3.2.2 VIEWS

Ensuring that every unit has a view of the ocean was one of the main design considerations. The natural average slope of the site allows residential rows to overlook one another. All units will be limited to single-storey height and are designed with shallow roof pitches (minimum ±3°) so that sightlines from the north pass cleanly over neighbouring roofs. The spacing between residential rows has been calculated to maintain sufficient vertical separation (as illustrated in the figure below), ensuring that seated and standing eye levels retain uninterrupted outward views toward the ocean. This approach allows each resident to benefit from the site's elevated coastal outlook, which is a key component of the marketability of the development. There is no other retirement resort in Plettenberg Bay that affords views like this.

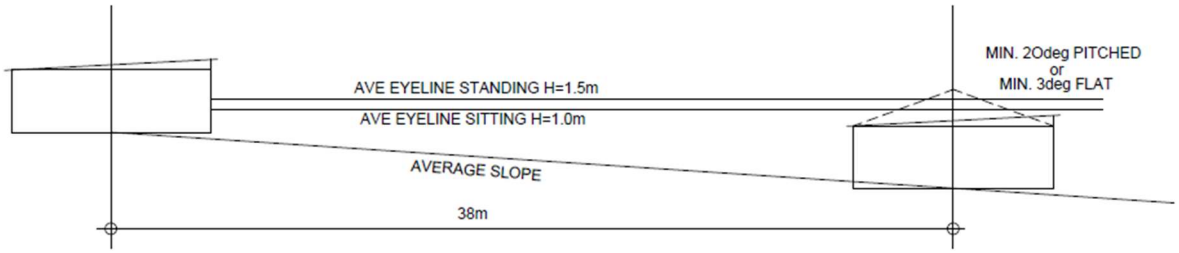


Figure 4: Placement of units to protect view lines

3.2.3 EASY ACCESS

The internal road network has been designed with a strong emphasis on age-friendly accessibility. Roads follow the natural contours of the site, resulting in gentle gradients and reducing the need for steep driveways. The natural slope of the land, together with careful positioning of building platforms, allows units to be established on level terraces with minimal cut and fill. This ensures that homes remain easily accessible while supporting safe and comfortable pedestrian movement between residences and communal facilities.

All residential units are planned as single-storey, step-free dwellings that are wheelchair adaptable. The relationship between roads, parking areas and entrances prioritises short walking distances, level access and clear sightlines. The layout deliberately avoids unnecessary level changes or abrupt transitions, recognising that ease of movement is a fundamental requirement for a retirement living environment.

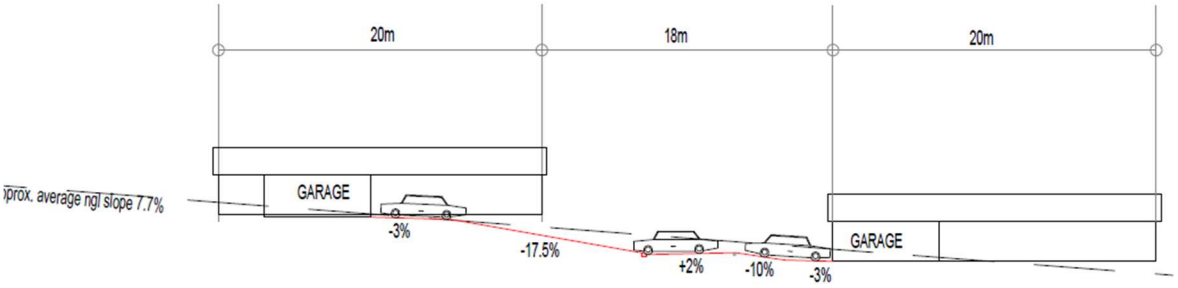


Figure 5: proposed driveway gradients

3.2.4 ENERGY EFFICIENT ORIENTATION AND DESIGN

The development is intended to operate largely off-grid in terms of electricity generation. Energy efficiency, therefore, informs the orientation of the layout at an early stage. In the Southern Hemisphere, north-facing roofs provide optimal solar exposure. The layout has been structured so that residential rows are aligned to maximise north orientation, allowing roofs to accommodate solar panels at appropriate angles.

Roof forms are expected to incorporate shallow pitches suitable for photovoltaic installations while maintaining a low visual profile. The spacing between rows ensures that buildings do not overshadow one another, preserving solar access and reinforcing passive design principles. Energy-efficient architectural guidelines will later address insulation, shading, glazing ratios, and renewable energy systems to reduce long-term energy demand.

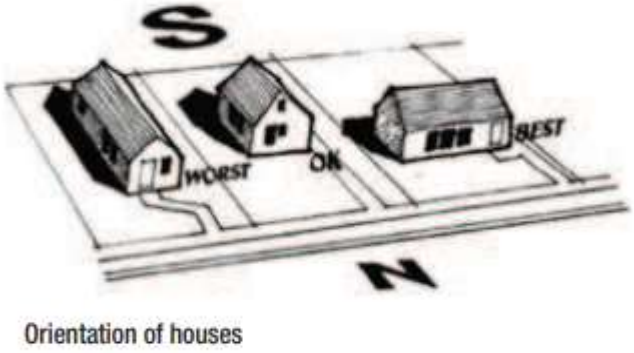


Figure 6: House Orientation

3.2.5 A CONNECTION WITH NATURE

A defining feature of the layout is the retention of approximately 20-metre-wide green corridors between residential rows. The retention of broad green corridors between building rows strengthens ecological connectivity and allows the development to sit within the existing fynbos landscape rather than replacing it.

Rather than conventional suburban gardens, the development aims to preserve the character of indigenous fynbos, allowing buildings to appear as discreet elements within a continuous natural landscape.

Areas identified by the aquatic study as non-perennial stormwater corridors have been excluded from the development footprint and incorporated into the open space network. These corridors, together with their associated buffers, form part of the green infrastructure system and will be managed using sustainable urban drainage principles, including swales and detention areas designed to mimic natural runoff patterns.

Walking paths, lookout points, and passive recreational spaces can be integrated into these areas without compromising ecological function. The result is a settlement pattern that maintains daily visual and physical contact with the surrounding natural environment, supporting resident wellbeing and reinforcing the sense of place.

3.2.6 SECURITY

Security is a necessary consideration in a retirement environment, particularly for a resident population that may be physically vulnerable. The development will operate as a gated complex with a single controlled access point and gatehouse. Perimeter fencing around the Retirement Estate will be designed to be visually unobtrusive and sensitive to the landscape context, while still providing effective access control.

The site is situated in a high fire risk zone, and a site-specific Fire Management Plan will be prepared as part of the operational framework for the resort to reduce wildfire risk and ensure safe evacuation

in the event of an emergency. The layout incorporates a 5.0 m wide firebreak along the southern and western boundaries of the residential portion. In addition, a perimeter sprinkler system is proposed along the estate boundary. The use of inflammable materials on the exterior of the buildings, which may be a fire hazard, such as wood, will be discouraged. The internal layout includes provision for an emergency exit route located on the southern boundary connecting to Whale Rock Drive, which will function as a secondary means of egress should the primary entrance be compromised. This access will remain closed under normal circumstances and will only be opened during emergencies. The Fire Management Plan will further address vegetation management, emergency response procedures, coordination with local fire authorities and associations.

Portions 63 and 62 will become part of the larger Robberg Coastal corridor and will not be fenced.

3.2.7 AESTHETICS

Although final architectural concepts are still in preparation, the intended character of the development can be described as coastal contemporary, drawing on muted natural colours and materials that blend with the surrounding fynbos landscape. Buildings are limited to single-storey height to reduce visual bulk and preserve the view corridors of individual units.

A landscaped buffer of approximately 10 metres is retained along Whale Rock Drive to soften the development edge and maintain a vegetated transition when viewed from the road and the adjacent residential homes. A detailed Visual Impact Assessment and architectural modelling will inform the final built form to ensure that the development blends in with the natural landscape.

3.3 PROPOSED ZONING AND CONSENT USE

All three the subject properties are currently zoned “Agriculture I”. In order to implement the proposed development, the following rezoning is required:

Portion 59 will be rezoned to “General Residential Zone I”
Portions 62 & 63 will be rezoned to “Open Space Zone III”

Each proposed zoning is discussed below in terms of purpose, permitted uses, definitions and development parameters as contained in the Bitou Zoning Scheme By-law, 2023.

3.3.1 GENERAL RESIDENTIAL ZONE I (GRZI)

Zone objective: "The objective of this zone is to encourage residential development of a medium density, with a coordinated design, and to accommodate group housing where special attention is given to aesthetics, architectural form and the inter-relationship between components of the group housing scheme."

The primary use in this zone is "**Group/town housing**", which is defined in the scheme as:

" A group of separate or linked dwelling units where—
(a) every dwelling unit has a ground floor;
(b) the units may be cadastrally subdivided;
(c) the units are planned, designed and built as a harmonious architectural entity in an ordered way;
(d) the units are integrated with communal private open spaces, private roads and parking; and
(e) it may include facilities reasonably associated with a group/town housing development."

The definition of a "group housing site" means "one or more land units on which a group housing scheme or retirement resort may be erected;

The planned retirement resort complies with the definition of a "group housing development".

Consent uses in the General Residential I zone include "**Home for the aged**" which is described in the zoning Scheme as "a *building where permanent lodging is provided, with or without meals, to persons who are bona fide retirees and—*
(a) includes—
(i) outbuildings as are normally used therewith; and
(ii) a frail care facility; but
(b) does not include—
(i) a dwelling house;
(ii) tourist accommodation;
(iii) guest accommodation; or
(iv) flats."

NOTE: This consent use will only be necessary if the main building contains a residential component (frail care or assisted living), which is not currently proposed.

DEVELOPMENT PARAMETERS FOR THE GROUP HOUSING ZONE	
Development Parameter	Compliance
(a) Design principles All buildings and structures must be planned, designed and built as a harmonious architectural entity, and special attention must be given to aesthetics, architectural coordination, urban design and landscaping.	It is the intention that all the units will be constructed by the developer and will be in a similar architectural style.
(b) Density The maximum gross density in any zone is 35 dwelling units per hectare	Portion 59 measures ±13,27ha and ±121 units are proposed. This calculates to a development density of 9.2units per ha.
(c) Height (i) The height of dwelling units may not exceed 8,5 metres; (ii) The general provisions regarding earth banks and retaining structures in this By-law apply. Unless the prior approval of the Municipality has been obtained— (a) No earth bank or retaining structure used for holding back earth or loose rock, whether associated with a building or not, may be constructed to a height of more than 2m above natural ground level; and (b) No series of earth banks or retaining structures may be constructed to a cumulative height of more than 2,5 metres above natural ground level, unless an approximately level	To protect view lines, dwelling height will be limited to ±5m above natural ground level (to be advised by architectural design and visual impact assessment). The gentle slope of the land will not require earth banks of this nature on Portion 59. Steeper slopes in the vicinity of the Museum of mankind need to be considered in the design of the building and amphitheatre

<table>
<tr><td>area of at least 2 metres wide is incorporated between successive.</td><td></td></tr>
<tr><td>(d) Open space
Outdoor space must be provided to the satisfaction of the Municipality</td><td>The conceptual design envisages a large tract of natural vegetation between the homes.</td></tr>
<tr><td>(e) Building lines along the perimeter of a group/town housing site
(i) a street boundary building line of 5 metres applies.
(ii) side and rear boundary building lines are 3 metres.</td><td>Currently, the layout allows for a building setback of at least 10m from the proposed Whale Rock Drive, which will allow a landscape buffer between the development and the road.
Side building lines of at least 5m will be observed, which will also function as fire breaks.</td></tr>
<tr><td>(f) Building lines within a group/town housing site
(i) street boundary building lines on internal roads are 0 metres.
(ii) side and rear boundary building lines within the group housing site are 0 metres…</td><td>The development will not contain any internal cadastral boundaries as the ownership concept is based on the life rights principle.</td></tr>
<tr><td>(g) Parking and access
Parking and access must be provided in accordance with the requirements of this By-law.
<table><tr><td colspan="2">PARKING RATIO FOR RETIREMENT RESORTS</td></tr><tr><td>Dwelling unit</td><td>2bays/du + 0.25 bays/unit for Visitors</td></tr><tr><td>Home for the aged</td><td rowspan="2">0,5 bays per bedroom</td></tr><tr><td>Frail Care</td></tr></table></td><td>Each unit will have a double garage. There will be space for guests to park in front of the garages as well as parking at the main building.</td></tr>
<tr><td>(h) Site development plan</td><td>A conceptual site development plan is available, and a final Site Development plan</td></tr>
</table>

A site development plan shall be submitted to the Municipality for approval.	will be submitted for approval once all authorisations have been obtained and final designs are available.
(i) Service yard Service yard(s) must be provided.	Each unit must include a dedicated, screened service yard for washing lines, water tanks, gas bottles and other visually intrusive utilities. These areas must be integrated into the architectural design to prevent visibility from streets, communal spaces and neighbouring units, ensuring a neat and consistent appearance while providing functional service space.
(j) Refuse room A refuse room must be provided.	A central refuse collection area will be provided near the main entrance, from where waste can be accessed and collected by the municipality. The estate will collect private waste from individual homes on waste collection days.

3.3.2 OPEN SPACE III ZONE (OPZIII)

To facilitate the protection of the natural landscape, it is proposed that Portion 62 and 63, which belong to the same owner, be rezoned to "Open Space III" (Nature conservation area). The objective of this zone is to provide for the conservation of natural resources in areas that have not been proclaimed as nature areas (non-statutory conservation), in order to sustain flora and fauna and protect areas of undeveloped landscape. The owner of the land parcels is also in the process of incorporating these two portions into the Robberg Coastal Corridor.

"**Nature Conservation Area**" is the primary use in this zone and is described as "the use and management of land with the objective of preserving the natural biophysical characteristics of that land, including the fauna and flora".

Development parameters:

(a) The Municipality may require an environmental management plan to be submitted for its

approval.

(b) The Municipality must determine the land use restrictions and the development parameters for the property based on the objectives of this zoning, the particular circumstances of the property and, where applicable, in accordance with an approved environmental management plan.

(c) One dwelling house is allowed if no dwelling house exists on another portion of the land unit zoned for agriculture purposes or if the full extent of the land unit is zoned Open Space III.

(d) When a consent use in a "nature conservation area" is approved, it is subject to conditions imposed by the Municipality with regard to layout, landscaping and building design.

(e) A site development plan shall be submitted to the Municipality for approval, who may impose such conditions as it deems fit; provided that the site development plan shall be approved prior to the approval of building plans and/or the use being exercised.

(f) The site development plan as approved by the Municipality, constitutes the development parameters.

A detailed site development plan for the Museum of Mankind is not available yet. The must proposal complies with the above-mentioned development parameters.

3.3.3 PROPOSED CONSENT USE

A range of consent uses is provided to supplement and support the main objective of this conservation zone. These include:

- Conference facilities
- Environmental facilities
- Freestanding base telecommunication station
- Function venue
- Rooftop base telecommunication station
- Holiday accommodation
- Tourist facilities
- Tuck shop
- Utility service
- Wellness centre

The project will require consent for "Environmental facilities", "Holiday Accommodation" and "Tourist attractions". The Museum of Mankind complex, with the boutique hotel, restaurant and amphitheatre, can be accommodated as consent uses within the Conservation Area.

"HOLIDAY ACCOMMODATION"

Land use description: "holiday accommodation" means a harmoniously designed and built holiday accommodation

development, used for holiday or recreational purposes, whether in private or public ownership, that inter alia —

(a) consists of a single enterprise that provides overnight accommodation and/or temporary residence and meals for transient guests by means of short-term rental or time sharing only;

(b) may include a **function venue**, wellness centre, **restaurant** and conference or training facility;

(c) may include the provision of a camping site, caravan park, chalets or mobile home park, resort shop, private or public roads; and

(d) does not include a backpackers' lodge.

Development parameters:

(a) When land is rezoned to Resort Zone, the Municipality must impose conditions with regard to density, layout, landscaping, and building design.

(b) A site development plan shall be submitted to the Municipality for its approval.

"ENVIRONMENTAL FACILITIES"

Land use description: "environmental facilities" means facilities for the management, study, interpretation, education, and public appreciation of a predominantly natural area or heritage site and may include hiking trails, but does not include tourist facilities or tourist accommodation.

Development parameters:

The Municipality must determine the land use restrictions and the development parameters for the property based on the objectives of this zoning and the specific circumstances, including adherence with an approved environmental management plan, where applicable.

"TOURIST FACILITIES"

Land use description: "tourist facilities" means amenities for tourists or visitors and—

(a) shall inter alia include lecture rooms, restaurants, gift shops, restrooms, and recreational

facilities; but

(b) does not include an off-road trail, wellness centre or accommodation facilities for tourists or holiday makers.

Development parameters:

(a) Development parameters applicable to “agriculture” apply. (30m building lines)

(b) Site development plan

A site development plan shall be submitted to the Municipality for approval, who may impose such conditions as it deems fit; provided that the site development plan shall be approved prior to the approval of building plans and/or the use being exercised.

3.4 ENGINEERING SERVICES

A Civil Engineering Services Report prepared by Poise Consulting Engineers is attached to this application and confirms that the site can be serviced in a technically sound and sustainable manner. The development is designed to operate independently of the current municipal bulk infrastructure, with provision made for future connection when municipal capacity becomes available.

3.4.1. WATER SUPPLY

As confirmed in the attached Engineering Report, no municipal water supply is currently available to the site. The development will therefore be serviced by boreholes, supplemented by rainwater harvesting from all buildings. An initial Hydrology Report and testing of the existing borehole on site indicate that the quantity and quality of the groundwater, supplemented by rainwater, should be sufficient to serve the development. Harvested rainwater will be used for non-potable purposes, while treated borehole water will comply with SANS drinking water standards. A bulk storage reservoir sized for domestic demand and fire protection will be provided at the highest point on site, and the internal water reticulation network will be privately owned and maintained. The system will be designed in accordance with Bitou municipal standards and national engineering guidelines, with provision made for a future link to the municipal water system when capacity becomes available. A Water Use Licence Application will be required.

3.4.2. SEWERAGE

No municipal sewer connection is available at present. Sewerage will therefore be treated via an on-site package sewage treatment plant designed to meet the Department of Water and Sanitation's

general discharge standards. The plant will include screening, biological treatment and disinfection components, and will operate under a formal maintenance and monitoring programme managed by the Estate. The plant layout allows for future conversion to a pump station to facilitate connection to the municipal sewer network once capacity becomes available. A Water Use Licence Application will be required.

3.4.3. STORMWATER MANAGEMENT

Stormwater management is based on Sustainable Drainage Systems (SuDS) principles. Attenuation ponds, swales and filtration measures are designed to ensure that post-development runoff does not exceed pre-development conditions for major storm events. The system limits erosion risk and protects downstream watercourses.

3.4.4. ROADS AND ACCESS

All internal roads will be privately owned and constructed to recognised engineering standards. The road network includes a main access collector road and internal access roads designed for safe vehicle circulation. Access to the site will be taken from Whale Rock Drive with appropriate lane widening and stacking distance. Parking areas are engineered to accommodate expected traffic volumes, including provision for accessible parking and bus access where required.

3.4.5. SOLID WASTE MANAGEMENT

Refuse management will comply with national domestic waste collection standards. A central refuse storage facility will be provided near the site entrance, sized to accommodate weekly waste volumes and separation of recyclable material. Waste will be transported internally to the storage area and collected by the municipality from the designated point.

3.4.6. ELECTRICAL SUPPLY

A detailed electrical engineering report has not yet been commissioned and will form part of a later design phase. At a conceptual level, however, the development has been planned to operate largely off-grid, with the intention that approximately 90% of its electrical demand will be met through on-site renewable energy generation.

All buildings will be designed to accommodate roof-mounted solar panels, with roof pitch and orientation specifically planned to optimise solar performance. The energy strategy is further

supported by reducing reliance on conventional electricity for high-demand uses. Kitchens may be fitted with gas hobs, and hot water will be supplied via gas geysers or heat pumps, significantly lowering the electrical base load of each unit.

The overall approach is to prioritise energy efficiency, resilience and environmental sustainability. The final electrical design will formalise the solar generation, storage and backup systems, and will be aligned with applicable safety standards and municipal requirements. The intention is to create a development that is largely self-sufficient while remaining capable of future integration with conventional grid infrastructure if required.

3.5 OWNERSHIP MODEL

The Retirement Resort component on Portion 59 is based on a life rights scheme and will not require subdivision of sectional title. A life-rights retirement scheme is a form of age-restricted residential accommodation in which residents acquire a contractual right to occupy a unit for the remainder of their lives, without obtaining ownership of the property. The resident pays an upfront capital amount for this right, together with ongoing monthly levies to cover management, maintenance, security, and communal services, while the land and buildings remain under single ownership. The life right terminates when the resident passes away or permanently vacates the unit, whereafter a contractually agreed portion of the original capital contribution is refunded to the resident or their estate. This form of tenure is regulated by the Housing Development Schemes for Retired Persons Act, 65 of 1988, and is commonly used in retirement developments as it provides secure long-term occupation, limits speculative resale, and enables the coordinated provision of facilities and care services for older persons.

Portions 62 and 63 will remain in the ownership of the NCH Trust.

4. Need & Desirability

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

4.1 NEED

4.1.1 THE NEED FOR RETIREMENT HOUSING

4.1.1.1 Existing retirement market conditions

Plettenberg Bay has developed into a recognised retirement destination within the Garden Route, driven by lifestyle migration, coastal amenity, and an ageing demographic profile. The town currently contains approximately 560 formally designated retirement units, of which 85 units (The Jetty Phase 1) remain under construction. Excluding this pipeline stock, approximately 477 units are actively occupied across existing retirement estates.

All operational retirement developments are currently fully absorbed. This indicates that the present retirement housing market is operating at capacity, with no observable oversupply.

4.1.1.2 Existing Formal Retirement Accommodation Supply in Plettenberg Bay

Development	Type	Units
Formosa Garden Village	Life-right retirement village	±129
Plett Manor	Retirement estate + assisted living	±177
Quartet Estate	Retirement lifestyle estate	±40
Glen Eden Village	Retirement village	±71
Stromboli's Retirement Village	Life-right retirement village	±60
The Jetty (Phase 1)	Retirement/lifestyle estate	±85

Current Estimated formal retirement supply ≈ 562 units

***** *Lifestyle estates that are not age-restricted have been excluded from this figure to avoid overstating formal retirement capacity*

4.1.1.3 Retirement market demand

The Bitou Local Municipality Spatial Development Framework (2022) records a baseline municipal population of 59,157 persons and 20,040 households (Executive Summary; Table 7 and Table 8: Population and Households 2001–2016; BitouSDF2022).

The SDF further projects a population growth rate of 3.8% per annum (Bitou SDF: Executive Summary, p. ii). The demographic age profile reflected in the Age Cohort Table contained in the 2017 Socio-Economic Profile for Bitou (referenced in the SDF demographic section, p. 35) reflects a projected 4,881 residents over the age of 65 in 2023.

Current formal retirement accommodation supply in Plettenberg Bay amounts to 477 units (Section 4.1.1.2 above). Applying a conservative retirement household size of 1.4 persons per unit (consistent with national small household trends for elderly households as stated in Stats SA's General Household Survey (GHS))**,** this equates to approximately 668 residents currently living within formal retirement estates. When measured against the 2023 65+ cohort of 4,881 persons, this indicates that approximately 14% of the retirement-age population currently resides in formal retirement estates (668 ÷ 4,881). This percentage represents observed local market behaviour rather than a speculative estimate.

Applying the SDF's projected population growth rate of 3.8% per annum to the 2023 65+ base of 4,881 persons results in a projected retirement-age population of approximately 9,200 residents by 2040 (compound growth over 17 years). If the observed estate penetration rate of 14% remains constant, the number of retirement-age residents likely to seek formal estate accommodation by 2040 would increase to approximately 1,288 persons. Divided by an average household size of 1.4 persons per unit, this translates to an indicative demand for approximately 920 formal retirement units.

Given that the current formal retirement supply amounts to 562 units, the projected long-term demand significantly exceeds existing capacity. Even with the addition of the proposed 121 units, the total formal supply would remain materially below projected 2040 demand levels. The modelling therefore demonstrates that the local retirement market requires expansion.

It is important to note that this modelling reflects demand generated solely by projected natural population growth within the existing demographic base. Plettenberg Bay functions as a high-amenity coastal lifestyle destination, and the SDF identifies tourism and lifestyle-based economic activity as a key economic driver. Coastal municipalities of this nature typically experience sustained semigration

of retirees and pre-retirees seeking secure, service-supported environments. High-quality, well-located retirement developments tend to stimulate additional in-migration beyond natural growth projections. Accordingly, actual demand may exceed the conservative estimates reflected above.

The proposed 121-unit retirement development, therefore, represents a proportionate and sustainable response to measurable demographic demand and supports long-term market requirements rather than oversupply.

4.1.2 THE NEED FOR A MUSEUM OF MANKIND

Specialist heritage investigations confirm that the property forms part of a regionally significant Early Stone Age landscape containing rare geo-archaeological deposits that contribute directly to understanding early human technological development in the Southern Cape. This places Plettenberg Bay within the global narrative of human origins research — a field of sustained scientific, educational and heritage tourism interest. Nelson Bay Cave (also called Nelson's Cave) is a key archaeological site in the Robberg Nature Reserve on the Robberg Peninsula near the proposed site of the Museum of mankind. Excavated since the 1960s, it reveals evidence of human occupation from the Middle Stone Age around 120,000 years ago through the Later Stone Age, including stone tools, shellfish remains, animal bones, and early adornments like ostrich eggshell beads. The cave served as a seasonal shelter for hunter-gatherers exploiting coastal resources and documents shifts in climate, sea levels, and tool technologies. Despite this international significance, the town currently lacks a dedicated public facility that interprets and showcases this heritage. Its tourism economy remains largely seasonal and coastal in nature, with limited year-round cultural anchors. A Museum of Mankind responds directly to this gap by establishing a permanent cultural destination that diversifies the visitor economy, attracts school groups, researchers and international cultural tourism, and strengthens off-season activity. From a spatial planning perspective, the proposal aligns with municipal objectives to promote tourism diversification and investment in authentic regional assets. The museum is grounded in an existing heritage resource rather than an imported attraction, creating a long-term educational, cultural and economic asset that positions Plettenberg Bay as a knowledge destination within the Garden Route.

The University of the Witwaterand has committed to a partnership with regard to the Museum of Mankind and has appointed Sarah Wurz and Bernard Ziptel onto the team.

Sarah Wurz is Professor of Archaeology at the School of Geography, Archaeology and Environmental Studies, University of the Witwatersrand, and she is affiliated with the Centre of Excellence on Early

Sapience Behaviour at the University of Bergen. She is the director of excavations and research at Klasies River main site situated on the Tsitsikamma coast, a key site for understanding the origins of modern humans or*Homo sapiens*. Her research on the Middle Stone Age and the Klasies River sequence led to new insights into the complexity of lithic technological and related behaviours from the last 120 000 years. Her background and expertise include music science and psychology. This provides the multidisciplinary context from which she investigates the roots of the unique aspects that underlie typical human behaviours and cognition. She is also active in archaeological heritage management and previously filled positions at the Iziko Museums of Cape Town and the South African Heritage Resources Agency.

Links:

https://www.wits.ac.za/people/academic-a-z-listing/w/sarahwurzwitsacza/

https://past.org.za/grantee-sarah-wurz/

https://www.uib.no/en/sapience/122156/stone-reader

https://www.researchgate.net/profile/Sarah_Wurz

Bernhard Zipfel is the University Curator of Fossil and Rock Collections at the University of the Witwatersrand and was formerly the Head of the Department of Podiatry at the University of Johannesburg (1990-2006). He curates all fossil and rock collections housed at the Evolutionary Studies Institute and School of GeoSciences, University of the Witwatersrand. He has a special interest in the biomechanics and evolution of the human foot, the origins of hominin bipedalism, palaeopathology and the preservation of natural history collections. He holds qualifications in Podiatry and Post-School Education from the University of Johannesburg, a B.Sc. (Honours) from the University of Brighton and a Ph.D. from the University of the Witwatersrand. He is the past President of the Palaeontological Society of Southern Africa (2012 to 2014) and is a Fellow of the South African Podiatry Association. He also co-directs the excavations at the archaeological site of Kromdraai.

4.1.3 SOCIO-ECONOMIC NEEDS OF THE LARGER COMMUNITY

Plettenberg Bay has a very similar demographic profile to the rest of the country. Socio-economic studies indicate high levels of poverty and unemployment. The social needs of the larger community form part of the “surrounding environment” and should receive consideration when new

developments are investigated. The “ripple effect” that a development of this scale has on the local economy and social well-being of the community cannot be ignored.

The proposed development is a major private investment that brings together a high-end retirement resort and a cultural facility with international appeal. The project will provide an immediate economic boost during construction and ongoing economic benefits once operational. These benefits include new employment opportunities, additional municipal revenue, and increased year-round activity, all of which strengthen the local economy.

4.1.3.1 Estimated Capital Investment

Component	Estimated Cost Range (ZAR)	Notes
Retirement resort (121 units @300m² + clubhouse	R1.05 – R1.25 billion	Luxury residential construction, including communal facilities @ an estimated build cost of ±R30 000.00/m²
Museum of Mankind complex	R180 – R250 million	High-spec cultural/public building
Boutique hotel (20 rooms)	R45 – R65 million	Hospitality component linked to the museum
Packaged sewage treatment plant	R2 – R3 million	Medium-scale plant sized for estate-level demand
Private bulk infrastructure (roads, water, sewer etc.)	R50 – R90 million	Internal civil infrastructure installed by the developer
Total Estimated Capital Investment	R1.33 – R1.66 billion	

**Figures will be refined when more detailed designs are available*

AVERAGE TOTAL CONSTRUCTION COST ESTIMATED AT R 1.5BILLION

4.1.3.2 Construction Phase Employment (Planning Estimates)

Construction employment estimates are derived from official national construction sector statistics published by Statistics South Africa (Stats SA). The methodology applies the observed employment-to-output ratio within the South African construction industry, based on total construction employment

recorded in the Quarterly Labour Force Survey (QLFS) and total construction sector output reflected in the Gross Domestic Product (GDP) by Industry dataset (current prices).
Recent national construction sector data indicate that the industry sustains approximately 2.5–3.0 direct jobs per R10 million of construction expenditure when adjusted to reflect value-added output and project-level capital expenditure.

Based on a capital investment of approximately R1.5 billion and applying national construction sector employment-to-output ratios published by Statistics South Africa, the project is expected to generate approximately 375–450 direct construction jobs during the active construction phase. Applying a conservative indirect multiplier of 0.4 yields an additional 150–180 indirect supply-chain jobs, resulting in a total estimated construction employment impact of 525–630 jobs.

4.1.3.3 Operational Phase Employment

Once operational, the development could support permanent year-round employment:
Retirement resort

- 30–45 direct jobs
- 15–25 secondary service jobs

Museum + hotel

- 30–45 direct jobs
- 20–35 indirect tourism jobs

Total sustained operational employment:

95–150 permanent positions

These roles are stable, year-round jobs that reduce reliance on seasonal tourism cycles.

4.2 DESIRABILITY OF THE SITE TO ACCOMMODATE THIS DEVELOPMENT

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

4.2.1 BIOPHYSICAL SITE CHARACTERISTICS

4.2.1.1 TOPOGRAPHY

The landform is characterised by a broad, shallow basin situated near the centre of the combined properties, surrounded by gently undulating terrain. The site is situated between 70 and 100m above sea level. The surrounding slopes drain radially toward this central low point, forming a localised catchment. This basin corresponds with an area historically disturbed by sand and gravel extraction and now functions as a seasonal stormwater accumulation zone. From this depression, surface runoff is conveyed via a defined non-perennial drainage channel that exits the site to the south-east toward the coastal zone.

Figure 7: 5m Aerial Contours from Cape Farm Mapper

Slope gradients across the majority of the site are low to moderate and are considered stable. The terrain consists primarily of long, shallow convex and concave slopes with no abrupt escarpments or steep ridgelines. The steepest gradients occur locally around the edges of the former quarry basin, where historical excavation reshaped the natural landform and created short artificial embankments. These areas will not be developed.

From a development perspective, the gentle and continuous gradient of the site of Portion 59 is highly favourable. The topography allows for efficient platforming with minimal cut-and-fill to facilitate accessible floor levels without the need for steep retaining structures or excessive terracing. This terrain is particularly well-suited to age-friendly residential development, where step-free access and gentle driveways are essential design requirements.

4.2.1.2 VEGETATION

The vegetation and biodiversity status of Portions 59, 62 and 63 have been assessed through specialist studies undertaken by Jan Vlok (Regalis Environmental Services, 2009) and subsequent aquatic and sensitivity investigations.

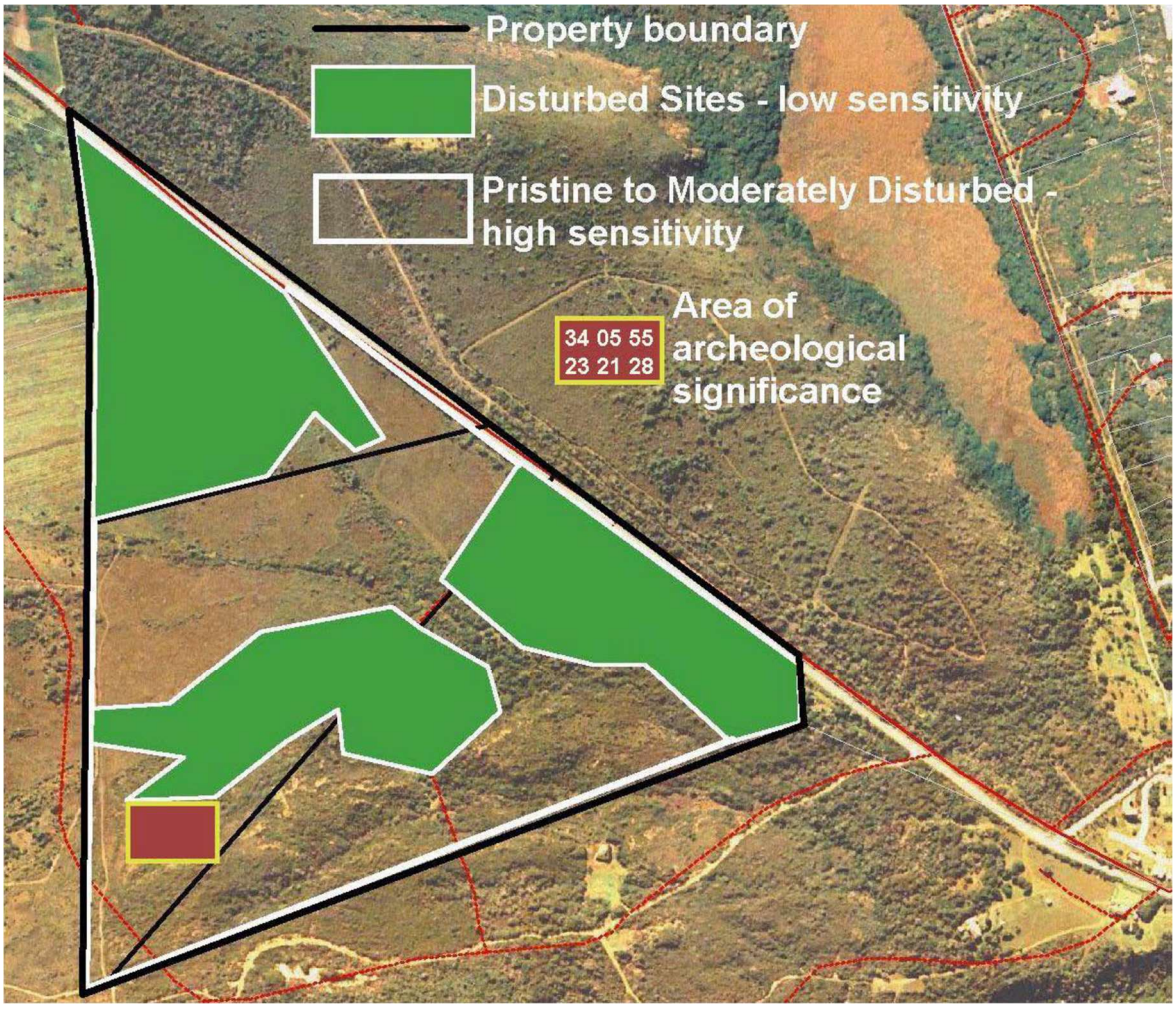


Figure 8: Ecology of the Site (Regalis 2009)

The specialist findings acknowledge that parts of the site have been historically transformed through agriculture, mining and alien invasion, and that these disturbed portions present the most appropriate opportunity for carefully designed development, provided that remaining natural vegetation and ecological processes are maintained.

The proposed residential development footprint is intentionally directed toward Portion 59, as this property has been previously disturbed by agricultural activity. The museum complex is also positioned in an area that was described as the least sensitive. Final development envelopes will be confirmed through updated ecological verification prior to submission of the Final BAR.

4.2.1.3 GEOLOGY

A detailed geotechnical investigation of Portions 59, 62 and 63 of Farm Brakkloof 443 was undertaken by Outeniqua Geotechnical Services in May 2011 to assess ground conditions and foundation suitability for future development. The study involved test pits, in-situ penetration testing and laboratory analysis of soil samples across the site. The findings confirm that the majority of the property is underlain by stiff residual soils derived from weathered sandstone, which are suitable for conventional low-rise construction provided normal foundation precautions are applied. The only area identified as unsuitable for structural development is the central low-lying basin associated with historical quarry disturbance and poor drainage. Outside of natural drainage lines and this basin area, the report concludes that the site is fit for development using standard engineering practices and does not present abnormal geotechnical constraints.

4.2.1.4 SOIL

The previous environmental scoping report provides a general description of soil types on the site, as confirmed by the geotechnical study, noting the presence of red gravelly soils in lower areas, grey sandy soils to the west and rocky sandstone-derived soils along the southern edge. However, the report does not include a formal agricultural capability assessment or soil classification study. While parts of the site were historically cultivated, no specialist evaluation has been undertaken to determine the agricultural potential or land capability in terms of current standards. This may still have to be investigated.

4.2.1.5 ARCHAEOLOGY AND PALEONTOLOGY

The archaeological and palaeontological context of the site has previously been the subject of specialist investigation associated with an earlier development proposal. A reconnaissance study titled *Reconnaissance of Early Stone Age Artefact Context* (Pether & Archer, 2012) confirmed that the southern portions of the property form part of a geo-archaeologically significant landscape containing widespread Early Stone Age artefact occurrences linked to the Brakkloof Formation. This study was undertaken to inform archaeological sensitivity and was not a full Heritage Impact Assessment (HIA).

The 2012 reconnaissance study concluded that, although isolated Early Stone Age (ESA) artefacts occur on Portion 59, these are sparse, disturbed and lack spatial integrity. The specialist therefore found that no further archaeological mitigation or test excavation was required on Portion 59. The study also concluded that the slopes on the eastern parts of portions 63 and 62, above the drainage line, where the Museum of Mankind complex is planned, are likely comparable to Portion 59 as regards the context and abundance of ESA material.

Although the broader southern landscape contains areas of high archaeological significance, the specific slopes above the drainage line where the museum precinct is proposed were previously assessed as having relatively low archaeological integrity compared to the protected quarry zone. The intention is not to develop within identified no-go heritage areas, but rather to position the interpretive facility in a location that allows public appreciation of the heritage landscape while maintaining conservation of the most sensitive zones. Final placement will be guided by the updated Heritage Impact Assessment.

An Earlier Heritage Impact assessment, which included archaeological and palaeontological desktop studies are available.

In terms of Section 38 of the National Heritage Resources Act, a new Heritage Impact Assessment — incorporating previous archaeological and palaeontological components and responding to Heritage Western Cape's prior directives — will need to be commissioned as part of the present application to confirm sensitivities, refine no-go areas, and inform an appropriate conservation and management plan, especially for portion 62 where the museum and tourist accommodation is planned.

4.2.1.6 HYDROLOGY

Bitou Municipality has confirmed that no municipal bulk water supply is available to serve the site. It is therefore essential that the proposed development is capable of providing a self-sustaining on-site water source.

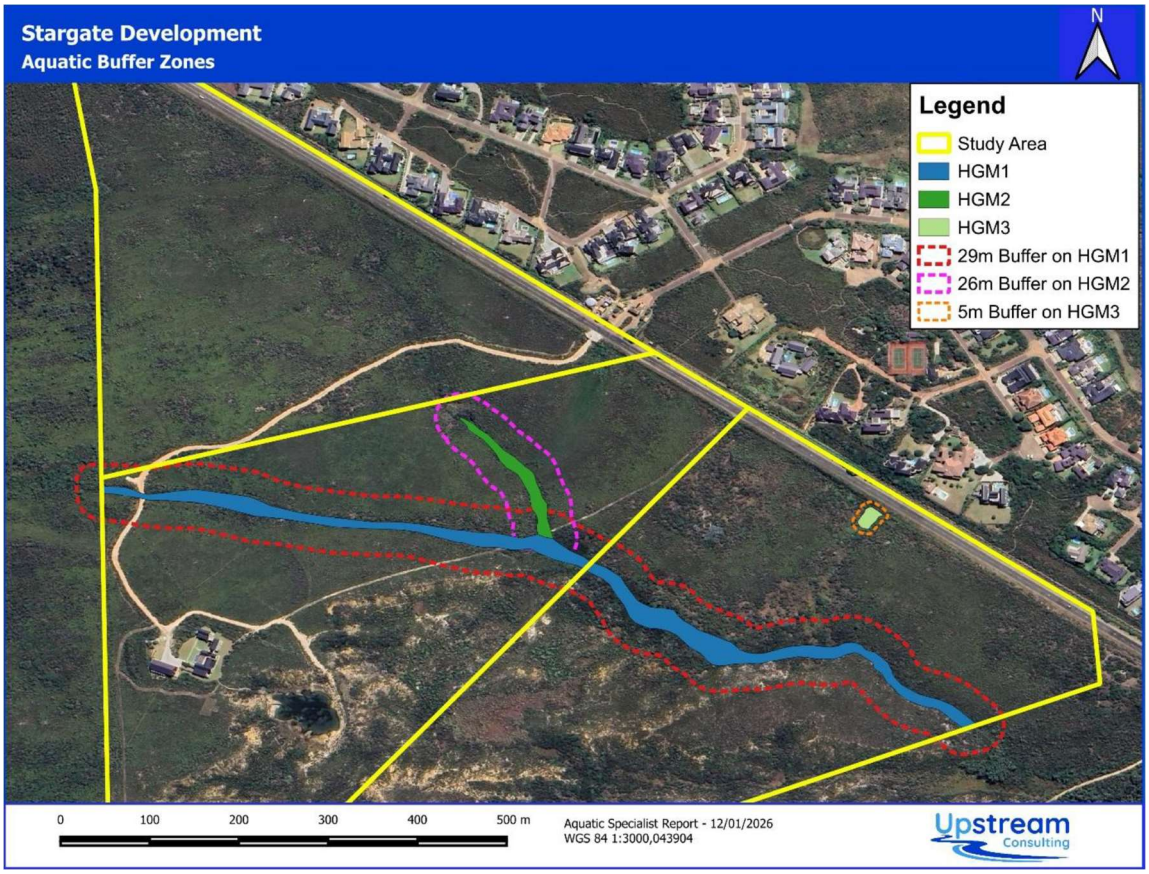
The existing borehole on the property has been subjected to a formal pumping test and yield analysis by DHS Groundwater Consulting Services. HBH1_Yield results are attached as an Annexure I. Pump testing of the existing borehole confirms that its current yield alone is insufficient to support the full development demand. For this reason, a hydrogeological investigation was commissioned to assess the groundwater potential of the property and the feasibility of additional borehole abstraction. The study confirms that the site is underlain by a productive fractured quartzite aquifer capable of supporting a managed on-site water supply. A groundwater investigation undertaken by Globiwell Consulting Hydrogeologists in October 2025 identified favourable fracture zones within the Peninsula Formation and confirmed strong regional groundwater potential across the property. The Groundwater Investigation Report is attached as an Annexure H. This borehole is expected to deliver a good, moderate yield in excess of 5000 litres per hour of good quality water.

The maximum projected water demand from the borehole, will be approximately 5400 litres per hour for a period of 20 hours per day. With consideration to the tested yield of a borehole on the adjacent Erf 8909 Plettenberg Bay, achievement of the required yield can be confidently expected. A Hydrological Impact Assessment will be required to determine how this planned abstraction will impact the surrounding groundwater sources and boreholes.

4.2.1.7. AQUATIC FEATURES

An Aquatic Site Sensitivity and Baseline Assessment was undertaken by Upstream Consulting in January 2026 to verify the hydrological characteristics and aquatic sensitivity of the site. The Study is attached to Annexure C. The study confirmed that no perennial rivers or natural wetlands occur on the property; instead, the site contains a small network of non-perennial drainage lines that function only during high rainfall events to convey episodic stormwater toward the coast. These systems are dry for most of the year and serve primarily as ecological corridors rather than active watercourses. Historical agriculture, quarrying and infrastructure have already modified parts of the drainage pattern. The specialist assessment concludes that development is feasible provided that identified drainage corridors are protected through buffer zones and appropriate stormwater management and recommends that future design respond to these features rather than treating the site as a high-flow aquatic system.

A full Aquatic Biodiversity Impact Assessment will be undertaken once the final design is completed, in accordance with the recommendations of the specialist baseline study. At the current conceptual planning stage, all preliminary layouts have deliberately excluded the delineated drainage corridors and their recommended buffer zones. No development or infrastructure is proposed within identified watercourses or protected aquatic setback areas. This precautionary approach ensures that any impact on aquatic features is avoided rather than mitigated after the fact.



4.2.1.8 SERVITUDES AND OTHER RESTRICTIONS

The property is not encumbered by any servitudes, but public roads traverse the northern boundary of the property and have been accommodated in the layout as per requirement from the Bitou Municipality. A 20m wide road reserve is observed along the northern boundary, measured from the boundary of the Whale Rock Development, which forms the northern boundary of the Road Reserve. A further minimum of 5m building restriction line applies along this road, but a wider building setback is recommended to allow space for a vegetation buffer between the road and the development.

4.2.2 COMPATIBILITY WITH THE SURROUNDING AREA

The site sits within a transitional/peri-urban landscape where residential, conservation, tourism, and service-related land uses already coexist. To the northeast lies the established Whale Rock Estate, a high-value residential area that currently forms the edge of the urban area. The development is characterised by low-density, high-value, landscaped properties that overlook the bay. The planned retirement resort will have a similar high-end estate character that will not conflict with the

established residential character to the north. The conceptual design of the development maintains a low vertical profile and a generous open space structure, ensuring that the planned development is not visually intrusive.

The land to the south and east is largely undeveloped and conservation focused. Portions 117 and 118 of Farm 443 are both zoned “Agriculture I” but remain vacant and are effectively used for conservation purposes, forming part of the broader Robberg Coastal Corridor. Some of the Coastal properties further to the west also form part of the Robberg Coastal Corridor and have obtained “Open space III” zoning. To the east lies the Robberg Nature Reserve, one of the most visited tourist attractions in Plettenberg Bay. The reserve is valued for its scenic walking routes, biodiversity and archaeological significance, including Nelson Cave (not open to the Public). The proposed Museum of Mankind is intended to complement this attraction. It introduces an educational and interpretive dimension that helps visitors understand the human history and cultural heritage embedded in the landscape. In this way, the museum adds another layer to the existing tourism experience and strengthens the link between conservation, heritage and local economic activity.

To the west, along the Airport Road, the land-use pattern shifts toward infrastructure and mixed rural activity. There is an active quarry and landfill facility to the west of Portion 59, beyond which lies the airport and a patchwork of rural smallholdings. These small holdings have a mixed-use character typical of an urban fringe environment and include land uses such as tourist accommodation ranging from basic units to high-end lodges, restaurants, nurseries, hatcheries, warehousing, service trades and a school. The site therefore does not sit in an isolated rural setting, but within a corridor where a mix of residential, tourism, conservation and service uses already exists.

The proposal occupies a space between existing land uses rather than pushing development into untouched territory. The intention to incorporate Portions 62 and 63 into the Robberg Coastal Corridor will, in fact, create a permanent conservation buffer that limits future westward expansion and reinforces a clear long-term settlement edge.

4.2.3 COMPATIBILITY WITH APPLICABLE FORWARD PLANNING DOCUMENTS

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

4.2.3.2 WESTERN CAPE PROVINCIAL SPATIAL DEVELOPMENT FRAMEWORK 2014

The Western Cape Provincial Spatial Development Framework (PSDF) is the statutory provincial spatial policy prepared in terms of the Western Cape Land Use Planning Act (Act 3 of 2014). The Western Cape Government has initiated a statutory process to prepare an updated PSDF, but a replacement framework has not yet been adopted at the time of writing this report. The 2014 PSDF, therefore, remains the applicable provincial spatial policy at the time of writing.

The PSDF promotes a spatial model that balances economic growth with the protection of environmental assets, particularly along the Garden Route coastal corridor, where tourism and natural landscapes are key drivers of the regional economy.

The proposal aligns with the PSDF's emphasis on protecting high-value environmental systems while supporting appropriate investment in areas already influenced by urban and tourism activity. The concentration of development within previously disturbed portions of the site, combined with the formal conservation of large areas through incorporation into the Robberg Coastal Corridor, reflects the provincial objective of strengthening ecological networks while accommodating sustainable growth.

4.2.3.3 WESTERN CAPE BIODIVERSITY SPATIAL PLAN 2023

The 2023 Western Cape Biodiversity Spatial Plan (WCBSP) identifies Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) as spatial priorities that require safeguarding to ensure the continued functioning of species, ecosystems and ecological infrastructure. The plan is a decision-support tool that informs sustainable land-use planning, environmental management and biodiversity protection across the province. While the WCBSP does not itself confer or remove development rights, the identification of areas as CBAs signals the need for heightened consideration of biodiversity impacts in land-use applications, and it guides environmental assessment processes towards avoiding, mitigating or compensating impacts in high-priority ecological areas.

While portions of Portion 59 and most of portions 62 and 63 are mapped as Critical Biodiversity Area, historical aerial photography and previous environmental assessments confirm that these areas were previously disturbed and have already been transformed. A new specialist ecological assessment is required to refine the CBA boundary at the site scale. This approach is consistent with the intended application of the WCBSP, which recognises that provincial biodiversity layers must be interpreted alongside current ground conditions when evaluating development proposals.

4.2.3.4 BITOU SPATIAL DEVELOPMENT FRAMEWORK 2021

The Council approved the Bitou Spatial Development Framework 2021 in March 2022. The main objective of this development framework is to achieve a balance between development and the environment to ensure that growth is spatially just, financially viable and environmentally sustainable by working towards compact, vibrant, liveable, and efficient settlements serving all communities.

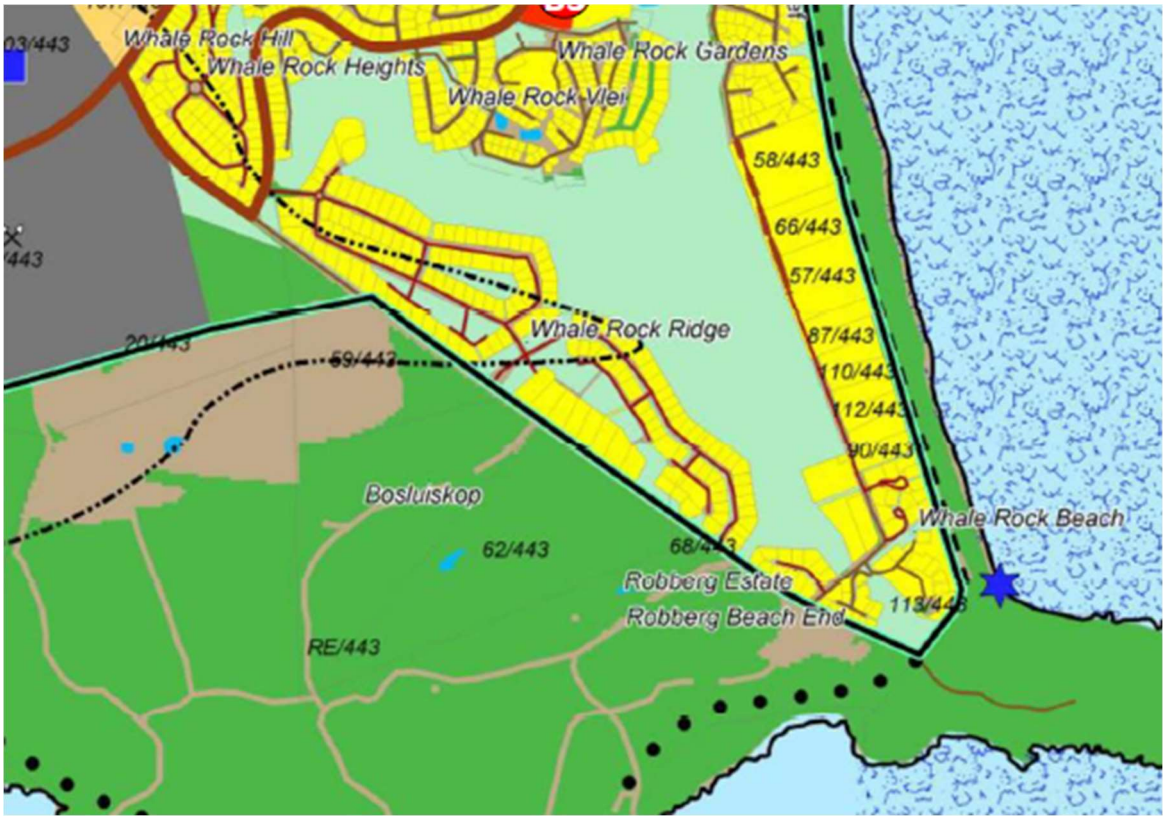


Figure 9: Extract from the Bitou SDF 2021

The protection of natural environmental resources of the area is fundamental to future economic development in the area as the two key economic sectors of the municipality (tourism and agriculture) are both resource-based. To protect these valuable resources, the Bitou SDF has defined an urban edge aimed at containing lateral urban sprawl within the municipality.

A portion of **Portion 59** falls within the urban edge and is designated for conservation purposes, while the remainder of the property lies outside the urban edge and is identified for agricultural use. The SDF does not provide any recorded rationale explaining why the urban edge bisects this cadastral unit. Furthermore, the land use demarcations reflected on the SDF map do not accurately correspond with the existing on-site conditions.

Ordinarily, an urban edge would be aligned with a clearly identifiable feature or planning rationale — such as cadastral boundaries, the extent of municipal service infrastructure (water, sewer and roads), environmental constraints (including conservation areas, wetlands or biodiversity corridors), or distinct physical features such as ridgelines, slopes, rivers or road reserves. In this instance, no such defining feature appears to justify the current alignment.

Portion 59 is also included within the **Plettenberg Bay Overlay Zone I**, which corresponds with the area previously regulated under the former Plettenberg Bay (Section 7) Town Planning Scheme. This further complicates the interpretation of the property's intended spatial status.
By contrast, **Portions 62 and 63** are located outside the urban edge and are earmarked for conservation purposes. However, the Infrastructure Masterplans incorporated into the SDF indicate these properties as future urban expansion areas, creating an internal inconsistency within the SDF framework.

The SDF confirms that all land development applications for the use of land abutting an urban edge should be considered consistent with the SDF if the land has at any time in the past been used or designated for any urban development. The old Knysna Plett Wilderness Guide plan, as well as the 2005 Plettenberg Bay Structure Plan, included all three portions as land for urban development. All three properties have also been included in the service Master Plan for Bitou. There is thus a good argument that the proposed development is consistent with the SDF.

Furthermore, the Bitou Spatial Development Framework identified a noise contour, and a portion of Portion 59 falls within this airport noise contour. At the same time, the same framework designates the broader area between Portion 59 and the airport as "Strategic Development Area 13", a priority residential growth zone adjacent to the airport precinct. This indicates that the municipality has made a deliberate spatial planning decision to accommodate urban expansion in proximity to the airport, subject to appropriate compatibility management rather than exclusion. The noise overlay signals the presence of aircraft activity but does not constitute a prohibition on residential development. Rather, it serves as a compatibility indicator, requiring that future residents be informed of the operational context of the airport.

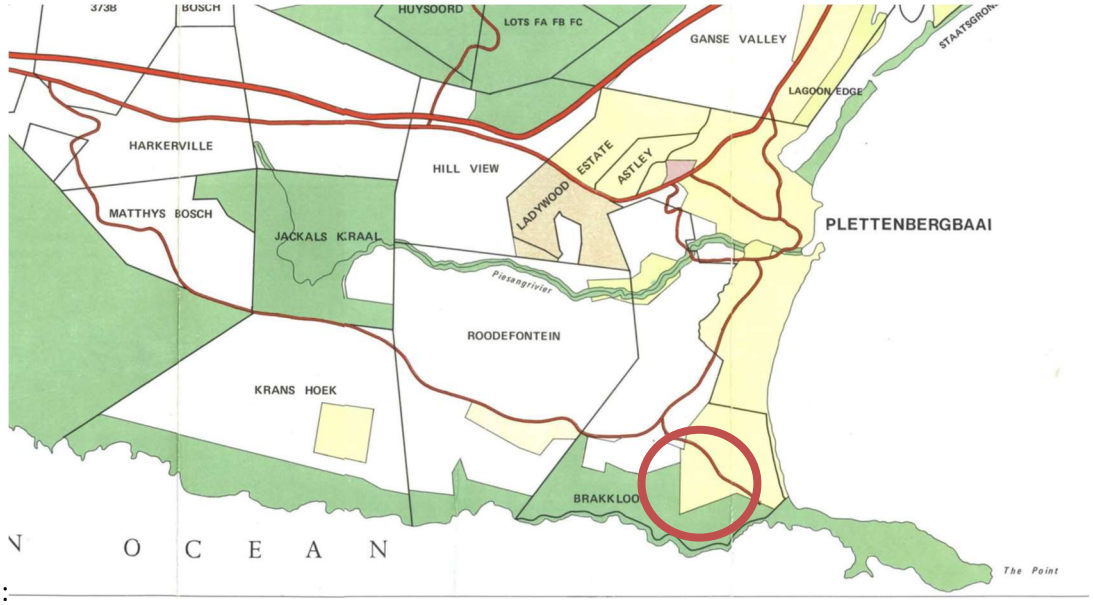


Figure 10: Old Knysna Plett Wilderness Guide plan earmarked the area as "Township Development"

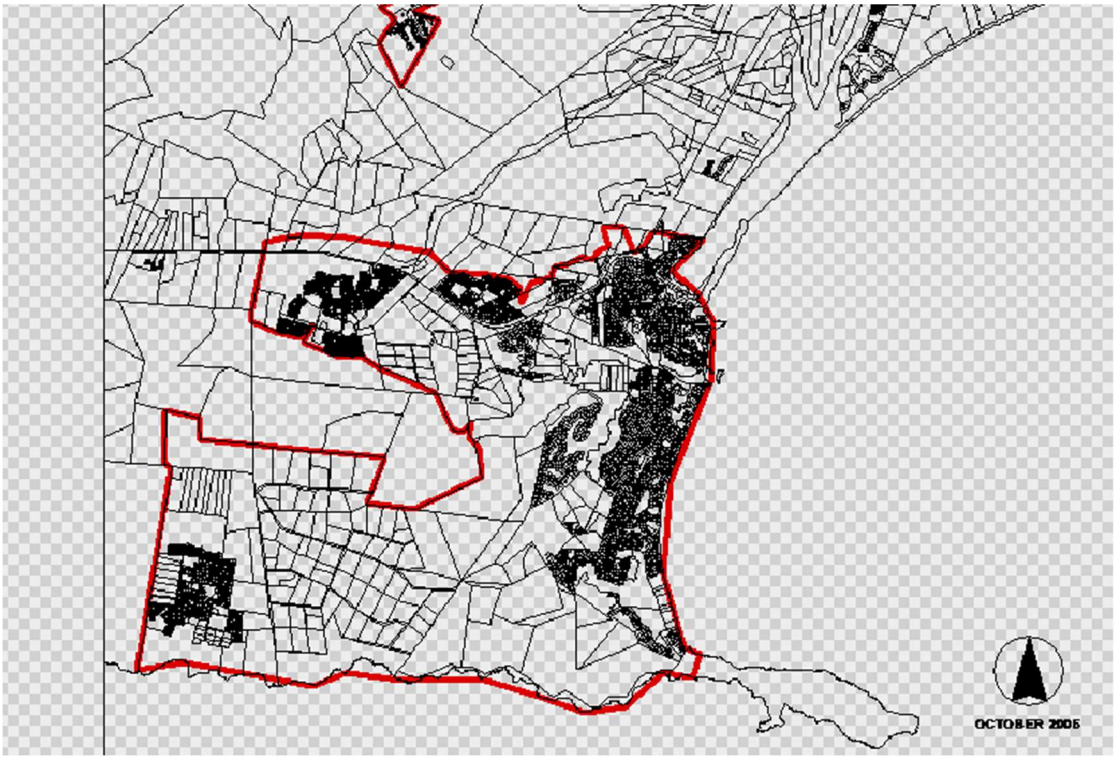


Figure 11: Bitou SDF 2005 included the area into the urban edges (red line) and proposed a residential density of 25 units per ha

4.2.4 COMPLIANCE WITH SPLUMA DEVELOPMENT PRINCIPLES

In terms of Section 7 of the Spatial Planning and Land Use Management Act (SPLUMA), land development must be guided by the principles of spatial justice, spatial sustainability, spatial

efficiency, spatial resilience and good administration. The proposal is assessed below in relation to these principles.

4.2.4.1 Spatial Justice

Spatial justice requires the redress of past spatial imbalances and the improvement of access to land and opportunities. While the proposed development is not subsidised housing, it contributes to spatial justice by responding to a clearly identified demographic need for retirement accommodation in Plettenberg Bay. The town functions as a recognised retirement destination, yet the formal retirement housing market is fully absorbed. The proposal provides appropriately located housing for an ageing population segment that is actively migrating to the area, thereby relieving pressure on conventional housing stock.

In addition, the cultural and tourism precinct introduces an economic and employment node that benefits the wider community. Construction activity, tourism expenditure, and operational employment create downstream economic effects that extend beyond the site itself. Spatial justice in this context is therefore advanced not only through housing provision, but through broad socio-economic participation.

4.2.4.2 Spatial Sustainability

Spatial sustainability requires development to protect ecological systems while enabling long-term economic viability. The layout has been deliberately structured to avoid sensitive biodiversity areas and to direct built form toward previously disturbed portions of the site. Large portions of the land are proposed to be rezoned to Open Space III and incorporated into the Robberg Coastal Corridor, strengthening ecological connectivity and long-term conservation outcomes.

The engineering strategy further supports sustainability. The development is designed to operate largely off-grid through groundwater abstraction, rainwater harvesting, renewable energy generation and an on-site sewage treatment system that complies with national discharge standards. Sustainable drainage systems manage stormwater in a manner that mimics natural hydrological processes. These measures reduce pressure on municipal bulk infrastructure and demonstrate a self-sufficient, resource-conscious settlement model consistent with SPLUMA's sustainability objectives.

4.2.4.3 Spatial Efficiency

Spatial efficiency promotes the optimal use of land and infrastructure. The retirement component is designed as a compact, coordinated life-rights estate with shared facilities and integrated open space rather than fragmented low-density sprawl. Infrastructure is concentrated within a defined footprint,

allowing the majority of the property to remain conserved. This settlement pattern achieves a balance between efficient land use and environmental protection.

The co-location of the retirement village and cultural precinct also supports efficiency by sharing access infrastructure, services corridors and management systems. The development leverages existing regional road access and does not require large-scale new public infrastructure investment. In this sense, the proposal represents an efficient extension of the existing urban edge rather than isolated rural fragmentation.

4.2.4.4 Spatial Resilience and Good Administration

Spatial resilience requires settlements to adapt to environmental and economic change. The proposal incorporates climate-responsive design, renewable energy systems, water independence and sustainable drainage infrastructure, reducing vulnerability to service disruptions and resource scarcity. Retention of natural vegetation corridors strengthens ecological resilience and protects the landscape from erosion and storm impacts.

Good administration is supported through the structured approvals process, specialist investigations, and the conclusion of formal services agreements with the municipality. The development framework anticipates future municipal service integration while ensuring that off-grid systems are professionally managed in the interim. This demonstrates forward planning, accountability and regulatory compliance consistent with SPLUMA principles.

5. Way Forward

5.1 AUTHORISATIONS REQUIRED

5.1.1 APPLICATIONS TO THE BITOU MUNICIPALITY IN TERMS OF THE BITOU MUNICIPALITY: STANDARD MUNICIPAL LAND-USE PLANNING BY-LAW (2016)

Rezoning in terms of Section 15 (2)a of the said Bylaw: The property is currently zoned "Agricultural I" in terms of the Bitou Zoning Scheme By-Law applicable to the area. To facilitate the development of the land, the property will have to be rezoned to a "General Residential I and Open space III".

Subdivision in terms of Section 15 (2)d of the said Bylaw may be required if the municipality requires the subdivision of the Municipal Road reserve (exempted application).

Consent Use in terms of Section 15 (2)o of the said Bylaw will be required to permit tourist accommodation, and tourist facilities within the 'Open Space III' Zone.

5.1.2 NATIONAL HERITAGE RECOURSES ACT 25 OF 1999

The rezoning of more than a hectare of land requires approval in terms of Section 38 of the Heritage Resources Act. A Notice of Intent to Develop (NID) must be submitted to Western Cape Heritage. During the previous application, the Western Cape Heritage has requested a full Heritage Impact Assessment. A Heritage Impact Assessment will be undertaken once the development design has been finalised.

5.1.3 SUBDIVISION OF AGRICULTURAL LAND ACT 70 OF 1970

The property was originally earmarked in the Knysna Wilderness Plettenberg Bay Guide plan for "Township" purposes. This means that although the property has farm portion numbers and is zoned for agricultural purposes, it is exempt from the provisions of the Subdivision of Agricultural Land Act (Act 70 of 70). An exemption certificate from the Department of Environmental Affairs and Development Planning has been requested.

5.1.4 APPLICATION TO SANRAL IN TERMS OF THE SOUTH AFRICAN NATIONAL ROADS AGENCY LIMITED AND NATIONAL ROADS ACT, ACT 7 OF 1998

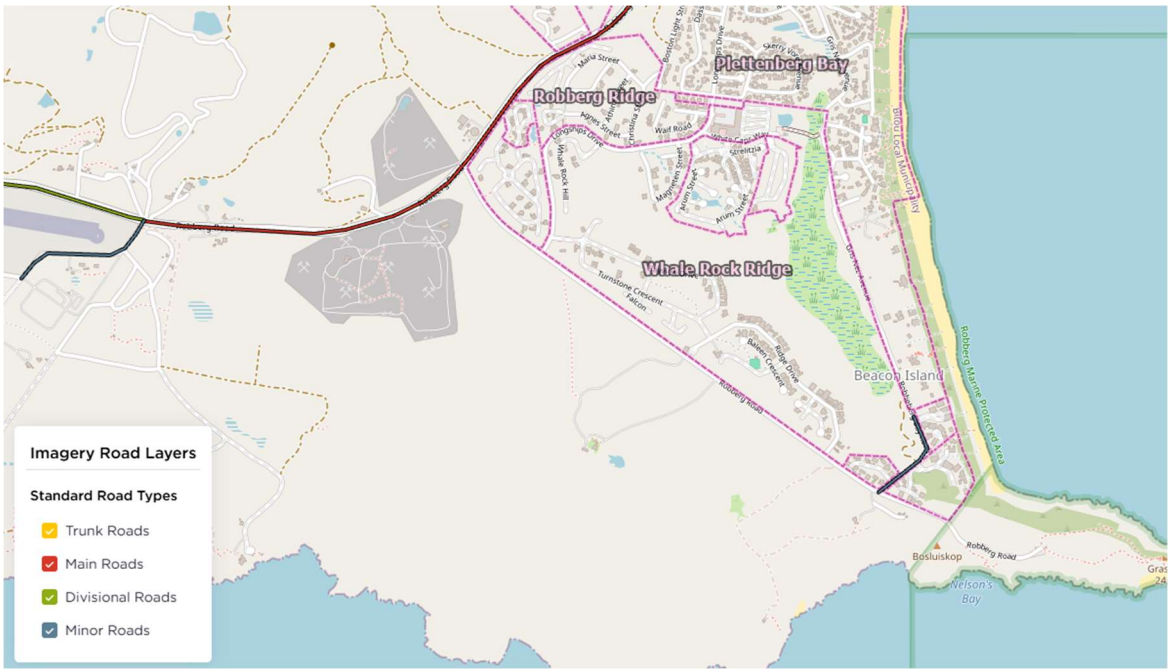
The property is not situated within a building restriction area as defined in Act 7 of 1998. A building restriction area means the area consisting of land (but excluding land in an urban area) situated

alongside a national road within a distance of 60 metres from the boundary of the national road or situated within a distance of 500 metres from any point of intersection with the road. An application to SANRAL is not required.

5.1.5 ADVERTISING ON ROADS AND RIBBON DEVELOPMENT ACT 21 OF 1940

A Surveyor-General may not approve a General Plan or the diagrams of erven situated wholly or partly outside an urban area if any part of any such erf, lot, or holding falls within a distance of 95m of the centre line of a building restriction road or of a main road, or within 500m of an intersection with a similar or national road, without written approval from the controlling authority concerned.

The property does not border a Provincial Road, and the intersection is more than 500m from the Main Road 382 (Airport Road) and will therefore not require approval from the Provincial Roads Authority. Whale Rock Drive has been de-proclaimed and is now a Municipal Road.



5.1.6 OUTENIQUA SENSITIVE COASTAL AREA REGULATION

Certain areas have been designated as sensitive in terms of these regulations and require approval from the local municipality should activities such as clearance of vegetation and earthworks be undertaken. The property falls within the identified OSCAE area, and OSCAE permits may be required from the municipality before building plan approval.

5.17 NATIONAL WATER ACT, 1998 (ACT 36 OF 1998) (NWA).

The project will require a Water Use Licence Application (WULA) in terms of the National Water Act (Act 36 of 1998). This is likely to include Section 21(a) for abstraction, Sections 21(c) and (i) for activities within the regulated area of a watercourse, and Section 21(f) for the discharge of wastewater. These requirements will be confirmed with the Breede–Olifants Catchment Management Agency (BOCMA) once the design has been finalised.

5.2 SPECIALIST IMPACT ASSESSMENT REQUIRED

- Heritage Impact Assessment (based on previous comments from the Western Cape Heritage)
- Visual Impact Assessment (based on impact on surrounding properties and as a requirement for the HIA)
- Archaeological Impact Assessment to support HIA.
- Aquatic Impact Assessment (based on findings of the Aquatic Compliance Statement)
- Hydrological Impact Assessment as required by the WULA application.
- Traffic Impact Assessment (based on impact on surrounding properties)
- Agricultural Impact Assessment (if required by relevant environmental authorities)

6. Summary

The proposed development has been planned with careful regard to the physical and policy context of the site. Built development is confined to areas that have already been historically disturbed, while the balance of the property is intended to be formally conserved as part of the Robberg Coastal Corridor. This nodal development proposal allows the project to protect the most sensitive environmental and heritage resources on the combined land parcels while accommodating a scale of development that is consistent

with the surrounding urban area. The current preliminary layout responds to known site constraints but will be refined once detailed environmental assessments have been finalised.

Importantly, the proposal is conscious of the limited availability of municipal bulk infrastructure in this part of Plettenberg Bay and the wider pressures on the town's service capacity in general. The development has therefore been planned to operate as a fully self-sufficient system in respect of water, sewer and energy, reducing reliance on public infrastructure and avoiding additional strain on municipal resources. In planning terms, the project responds to an identifiable retirement housing need, supports tourism diversification through a heritage-based facility, and introduces sustained economic activity and job creation without undermining environmental priorities. Subject to the completion of specialist studies and statutory approvals, the proposal represents a balanced and appropriate land-use outcome that aligns with the intent of applicable spatial planning frameworks.