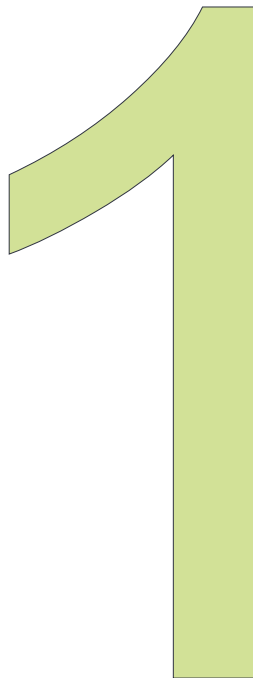


ANNEXURE



1. Annexure 1

1.1. SDF Review Framework and Assessment Findings

1.1.1. Objectives

As discussed in Chapter 2, there is a clear legislative and policy context that has informed the update of the Eden District Municipality's Spatial Development Framework, most of which was not in existence at the time of the 2009 Eden District SDF.

The purpose of this assessment is to inform the review and update of the currently adopted 2009 Eden District SDF. It distills regionally relevant spatial trends, issues, opportunities and challenges extracted from existing provincial, district and local municipal planning documents, key databases and draft reports produced as part of other current parallel regional planning processes.

The existing 2009 SDF is generally thorough and comprehensive, but has had very little impact on decision-making and is generally not used in Local Municipal Planning. This evaluation and assessment of the 2009 SDF aims to:

1. Highlight significant contextual shifts and new spatial drivers of regional development trends, opportunities and issues
2. Align the SDF with new policy, legislation and District objectives
3. Confirm or amend the 2009 SDF proposals to bring a clearer strategic focus to implementation actions informed by a deeper understanding of the fiscal and institutional context.

In particular, the Spatial Planning and Land Use Management Act supported by the Western Cape Government's Land Use Planning Act and the Department of Rural Development and Land Reform's

SDF Guidelines set out clear content requirements for municipal spatial development frameworks.

The 2009 Eden District Municipality's SDF elements have been assessed to ascertain the extent of alignment with these guidelines: this corresponds with a recent conformance assessment undertaken by the Western Cape Government of the Municipalities 2016/17 MTREF Budget, IDP and SDF. It is important to note that the approach to the formulation of the SDF is premised on the SPLUMA principles outlined in Chapter 2 of this report.

1.1.2. What has Changed Since 2009?

1.1.2.1 New Policy Context

SPLUMA identifies a number of demographic, socio-economic and environmental trends that the SDF must consider in its status quo and project forward in its planning; namely:

- Population growth projections for the next five years
- Estimates of demand for housing units across different socio-economic categories and the planned location and density of further housing projects in the next five years
- Estimates of economic activity and employment trends and locations in the next five years
- Environmental pressures and opportunities within the municipal area, including the spatial location of environmental sensitivities, high potential agricultural land and coastal access strips
- Identify, quantify and provide location requirements of engineering infrastructure and services provision for existing and future development needs for the next five years

These are expanded upon in the following section, as well as in the relevant Strategic Directives for the SDF Review.

The 2016 LG MTEC Review highlighted the following challenges with the Eden District SDF and IDP in relation to SPLUMA objectives:

“Spatial Justice, which in part encompasses redressing spatial imbalances through settlement restructuring and addressing informal settlements, is addressed in the SDF. Chapter 4 contains “objectives” which reflect the desired spatial form of the Municipality. These objectives are in line with normative principles contained in Chapter 8 of the NDP. There are two maps in the [2009] Eden District SDF which set out the implications for both Planned Regional Infrastructure and Planned Regional Tourism and Environmental Initiatives. In addition to the above, Spatial Development Challenges and Spatial Development Objectives are clearly set out. The SDF goes on to list growth management and current settlement pattern as two of the four primary concerns for planning in the District. It is recommended that in the revision of the Eden District SDF, that the District takes note of the development trajectory of many of the settlements within the Eden District Municipal area, with a view to analyse whether these settlements are in fact achieving settlement restructuring or further entrenching spatially disconnected and disintegrated development.

In terms of **Spatial Sustainability**, which in part encompasses promoting land development that is within the fiscal, institutional and administrative means of the Republic and limitation of urban sprawl. The Eden District SDF Review Report does make some recommendations as to how sustainability can be mainstreamed into the programmes and activities of the municipality. The purpose of the said Review Report is to bring the SDF in line with the latest relevant policy guidelines of the Provincial and National Government. Although there is a general description of biophysical features, it is still based

What has changed?

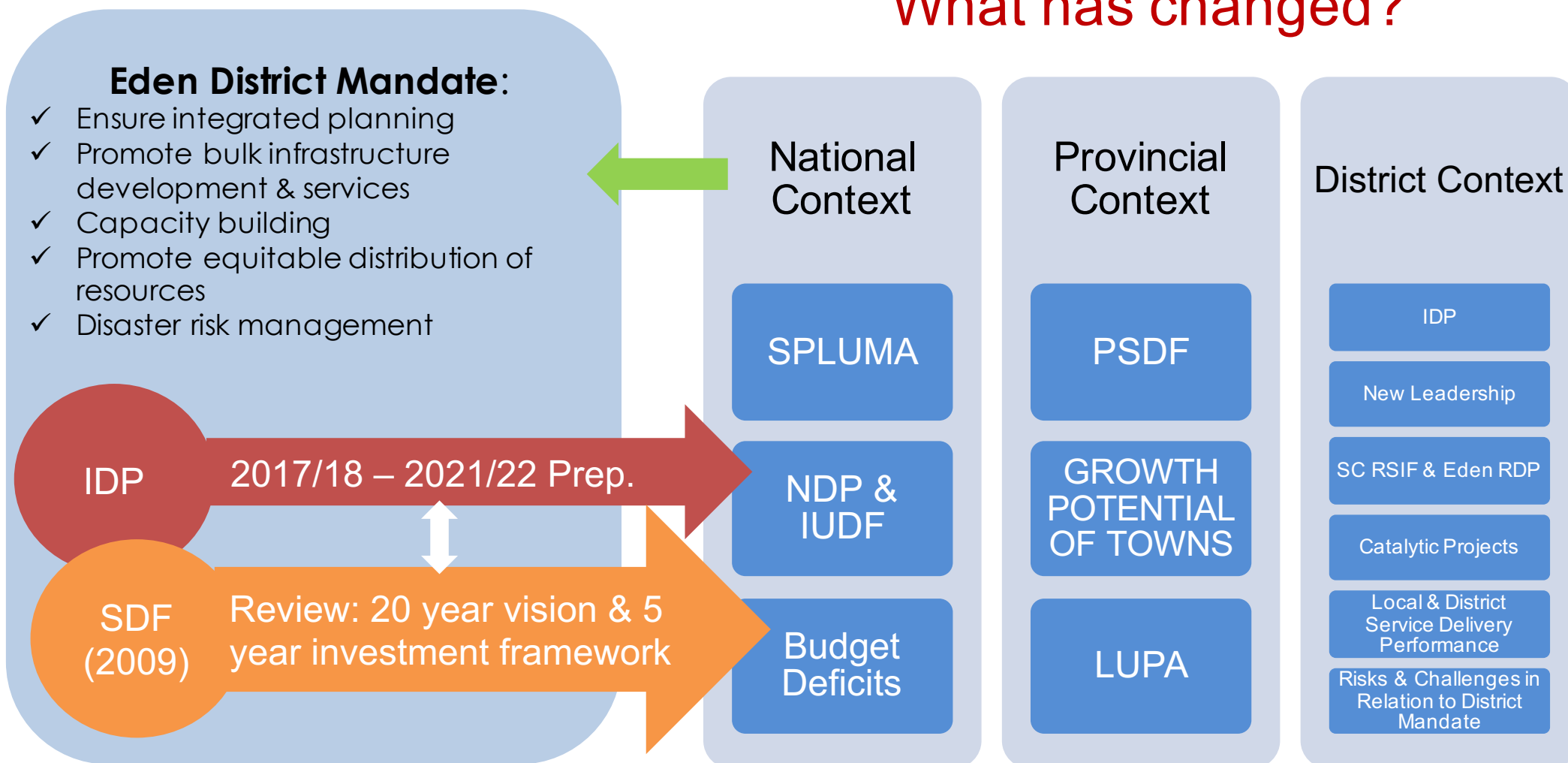


Figure 88. Eden District SDF Review Framework

on outdated conservation programmes and vegetation maps (predating 2010). However, it should be noted that these were the best available plans at the time and prior to the current CBA maps. It is recommended that the latest CBAs and Threatened Ecosystems conservation plans be incorporated in the new SDF and that the Eden District SDF takes note of the outcomes of the Mossel Bay Growth Options Study and other relevant studies in making proposals for the future growth and development of the region.

In terms of **Efficiency**, which in part encompasses land development that optimises the use of existing resources and infrastructure, the Eden District SDF responds to this principle by, inter alia, promoting the need for an efficient administration and good governance as prescribed in terms of PAJA. Increased resource use efficiency is a common thread throughout the SDF and it works its way into several of the SDF policies, such as energy efficiency. It is recommended that in the update of the Eden District SDF, implementable and concrete measures are identified to improve resource use efficiency in the region, relating to water, energy and government expenditure.

In terms of **Spatial Resilience**, the Eden District SDF responds to this principle through advocating for adaptation to climate change, and it is sufficiently “fleshed out” at the policy level. However it is unclear how far these proposals have been implemented, if at all, within the Municipality.

In terms of the overall assessment of the SDF, the SDF for the most part meets the MSA Regulations requirements. However, the delineation of urban edges is not a requirement for a District Municipality and has thus not been completed. It is important to note that a District SDF is inherently different from a local municipal SDF. A District SDF focuses on the issues that have a district wide (regional) impact. A local municipal SDF draws on the input contained in the District SDF and provides further detail which will guide local planning decisions. The SDF does however provide clear development objectives and associated policies and strategies which do provide clear direction to both the IDP and local IDPs and SDFs” (18-19).

2. Annexure 2

2.1. Vision Session Workshop Outcomes

Group 1

The key discussion points, opportunities and challenges for focus group 1 are discussed as follows:

- Establish a destination marketing agency that will drive tourism for the region. This agency should deliver a marketing service for all local municipalities in the region.
- Unique branding for the region (not just as a holiday destination, but for all 12 months of the year). The brand should become more unified, moving from Eden District to Garden Route District Municipality (which is internationally recognised).
- To establish the district as an international venue for outdoor sports and adventure events.
- Expand the George Integrated Public Transport Network (GIPTN) to include all towns in the Eden District (increasing access to job opportunities, health services, housing and schools).
- Become a services-orientated industry within the global context. Emphasis on financial services, medical specialisation, learning, tourism, ICT and exclusive manufacturing (e.g. gold and watch matching).
- Government and businesses to plan effectively for the future of the Southern Cape.
- Specialist medical treatment and recovery (e.g. plastic surgery and treatment in George or Mossel Bay and initial recovery in Knysna / Bitou).
- Provide effective fire services throughout the region.
- Provide bulk water infrastructure to unlock housing, job opportunities, expansion of businesses etc.
- Incentivised conservation.



Figure 89. Group 1 Spatial Ideas

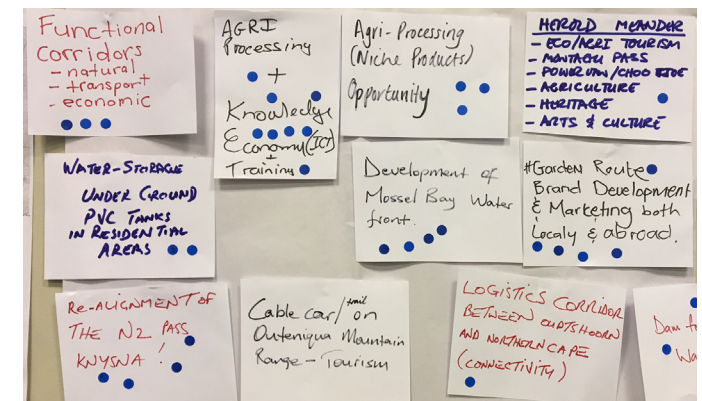


Figure 90. Stakeholders Participating in Work Group Discussions

Group 3

The key discussion points, opportunities and challenges for focus group 3 are discussed as follows:

- Education with a difference: schooling that does not just encompass academics, but institutions that equip learners with skills. Thus, preventing the staggering statistic of first year dropouts at university.
- Provide a university for Knysna
- Support municipalities to translate SDFs into implementable projects
- Development to consider intermediate area around core biosphere area as an area for municipal development but as potential for research, development of tertiary institutions, research stations, research organisations and biosphere interactions
- Mossel Bay International Airport
- Keep the town clean by implementing incentives for waste collecting – provide clothes and food in exchange for the collection of waste materials
- Move Oudtshoorn airport to make space for Oudtshoorn to expand
- Collaborate on a regional approach to promote / roll out a waste minimisation strategy and implementation plan for Eden District that includes a rigorous education and awareness drive to reach 20% target by 2020.
- Invest in small businesses by opening up land and streets for small business to prosper
- Promote Integrated Development Planning that considers environmental, social and economic issues (sustainable development)
- Agriculture – promote “clean” industry
- Create cycle route on old railway line from Knysna to George
- Water storage – dams between mountains and seas
- Remove degraded railway line



Figure 92. Group 3 Spatial Ideas

Group 4

The key discussion points, opportunities and challenges for focus group 4 are discussed as follows:

- Develop a Garden Route tourism brand, unify with Klein Karoo tourism brand with well-packaged route and products for tourism niche markets
- Regional eco branding strategy – cross boundary collaboration
- Improve training facilities and capabilities
- Develop harbour for import and export – link with rail system
- Promote, market and facilitate Information and Communication Technology (ICT) services and the innovation sector
- Planning driven by co-operation and sharing of resources as opposed to competition
- Get the Tesla motor factory to locate to Hansmoeskraal
- Optimise Mossel Bay Harbour
- Develop a railway line that runs from the Mossel Bay CBD along the coast to George
- Well-established tourism industry, high demand, but needs more facilities. Coherent Garden Route brand
- Cango Caves tourism potential
- George – economic hub, airport, IPTN and tourists (well-located)
- Mossel Bay – existing port infrastructure
- Oudtshoorn – mountain, sea, archaeological assets, agri-hub
- Alternative agri-industry in Klein Karoo due to the unique climate
- Good road infrastructure and extension of N2
- Beaches, climate and archaeological assets
- Coastal access and assets contributes to tourism

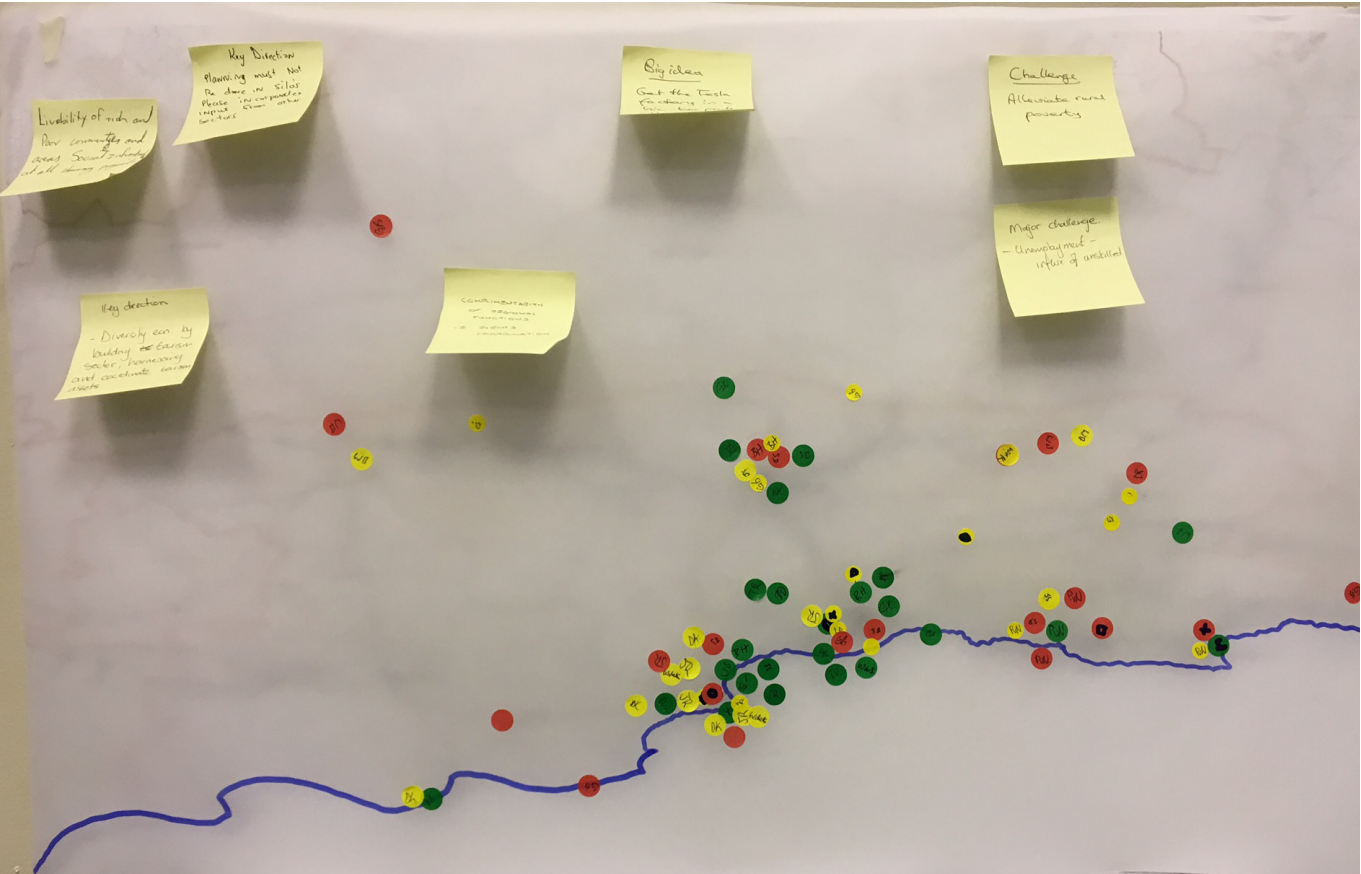


Figure 93. Group 4 Spatial Ideas

- Adventure sport and ecological assets (e.g. bridge jumping at Gouritz)
- Air quality – good co-operation with forums.
- Special expertise within the region
- Tourism eco-branded strategy
- Air routes, agri-park master plan to feed into George airport.
- Air space is capacitated
- George is introducing new flights, however, scale is an issue
- Oudtshoorn airport might move them out
- Agri-tourism: Saarsveld and Rheenendal cycling and agri-processing tour
- Tourism adventure routes, promote cross boundary routes
- Hansmoeskraal – promote primary sector because it is labour absorptive and quaternary sector (ICT)
- George chamber of commerce: up-skilling South Cape college (innovation hub)
- Alleviate rural poverty

Group 5

The key discussion points, opportunities and challenges for focus group 5 are discussed as follows:

- Develop coastal road / route from Mossel Bay to Port Beaufort or Gouritz to Breede River
- Maintain Integrity of Garden Route
- Develop and market a collective Garden Route brand
- Mossel Bay / George International Airport
- Construction of harbour in Mossel Bay to cater for oil tankers and passenger liners.
- Use existing PetroSA refinery to process shale gas (fracking)
- Become a disaster resilient
- Bulk water supply and bulk storage facilities
- Educate and motivate informal and small scale water uses within catchments to protect water and reduce impacts on resources
- Revitalise Mossel Bay CBD (see buildings to developers)
- Invest in helicopters to survey crime and aid in fire fighting
- Integrated education platform, invest / provide new colleges for health professionals, maths and science centres, engineers etc.



Figure 94. Group 5 Spatial Ideas

Group 6

The key discussion points, opportunities and challenges for focus group 6 are discussed as follows:

- Knysna should be promoted as the Silicone Valley of Africa (120 km of fiber network)
- Provide Garden Route Convention Centre in Knysna
- Provide more education facilities, call centres and basic services for indigenous people
- Centre for bio-mimicry – research and use of design principles of nature (to enhance products and approaches)
- Provide a “Garden Route University of Marine and Coastal Studies”
- Sports academy
- Provide a comprehensive university for the Southern Cape (include medical, law and civil engineering)
- Consolidate urban planning
- Avoid natural areas to promote tourism
- Need for skills training
- Focus on cycling in the Garden Route
- Increase north-south linkages to Plettenberg Bay by touring the Prince Alberts Pass between Uniondale and Plettenberg Bay – focus on agriculture and economic potential

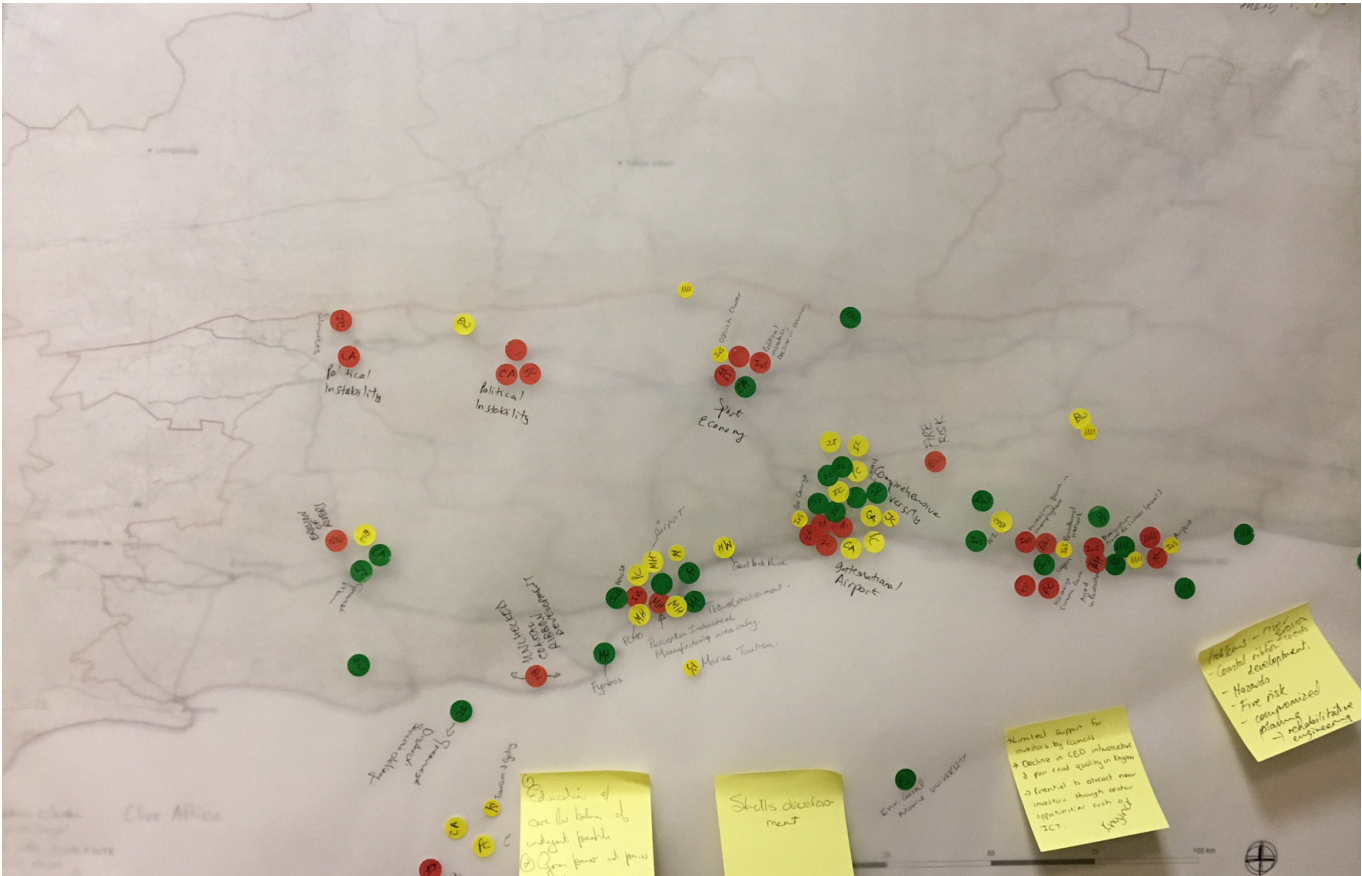


Figure 95. Group 6 Spatial Ideas

2.2. Focus Groups Emerging Themes

Following consultation between Eden, SCEDP and WCG, as well as following key findings of the Southern Cape RSIF status quo report, it was agreed that 10 focus groups would be established with the intention to develop a “Strategy Outline” for the particular topic or focus group.

Focus Groups were tasked to clarify the key questions that were to be addressed in the focus group sessions in relation to that particular topic or sector. They were also asked to identify the big ideas, solutions and actions that need to take place, and to develop a brief implementation framework that included the major players, resources, and time frames.

The focus groups were structured as follows:

Agriculture

Facilitator: Clyde Lamberts (DoA)

Drought management, food security, agri-processing, agri-parks, hydroponics, aquaponics, fishing, markets and fresh produce markets, abattoirs, forestry, farmer support and land reform.

Aviation

Facilitator: Willem de Kock

Topics for discussion: role and distribution of airports, relocation / upgrading / future of airports (Oudtshoorn, Plettenberg Bay, Mossel Bay, George, etc), spin off opportunities, functional use (tourism, business, agriculture, training, military) and international airport status.

Disaster Management, Safety and Security

Facilitator: Gerhard Otto (Head of Eden District Disaster Management)

Climate change, risks, disaster centres, biological hazards, response systems, floods and fires, road accidents and animal disease.

Engineering and Bulk Services

Facilitator: Sam du Preez (DLG Chief Engineer at Directorate Municipal Infrastructure) supported by Hanré Streicher (GLS) and Pierre Conradie (CMB)

Water and sanitation, electricity and alternative sources, waste management and recycling, data and fibre optics, and new dam locations.

Environment and Cultural Landscapes

Facilitator: John Sharples (Sharples Environmental Services)

Conservation areas, heritage protected areas, sustainable resource management, drought management, alien plant invasion, monitoring and compliance, air and water quality, scenic and cultural landscapes.

Industry, Tourism and Business

Facilitator: Melanie Wilson (EDM LED) supported by Paul Hoffman (SC EDP)

Industrial areas and zones, ICT, CBD upgrades, new retail developments, green industry, recycling, renewables, cross cape cycling, trail, eco-tourism, film industry, conference facilities and events, tourism centre and branding and skills development.

Innovation, Skills and Entrepreneurship

Facilitator: Paul Hoffman (SCEDP)

New business development, entrepreneur and skills development, renewable energy, biotechnology and broadband (conservation / environment related).

Oil, Gas, Ports and Freight

Facilitator: Adrian Strydom (SAOGA) supported by Eduard Lotz (Eden DM PMU Manager)

Ports, port logistics, oil and gas reserves, fracking, fishing industry and Mosgas, etc.

Transport and Access

Facilitator: Hans Ottervanger (Eden DM Roads Manager) supported by Gerhard Hitge (Eluti Consultants)

Road infrastructure, transport networks, storm water, rail infrastructure, regional public transport, passenger / tourism rail, rail and road freight transport.

Settlement, Growth Management and Social Facilities

Facilitator: Johan Compion (Eden DM Municipal Health and Environmental Services Manager) supported by Barbara Southworth (GAPP)

Urban development management, growth patterns and potential, urban and rural settlement roles and relationships, NMT and walkability, safety, built heritage, health care facilities, diseases, social facilities and regional education, skills development.

The Status Quo findings have been structured to align with the ten focus areas. These are expanded on in the Annexure and are summarised in next chapter.

2.3. Engagement with Local Municipalities

The George, Knysna and Bitou Municipal planners were interviewed to establish their views on the current SDF and what they wished to see reflected in the SDF review.

They indicated that the following content would be the most helpful to assist in the implementation of the Local MSDFs and in making land use decisions or engaging with other spheres of government:

- Alignment with national and provincial grant funding initiatives is key to assisting the private land owner to contribute to rural reform.
- The Eden District SDF could make suggestions as to the prioritisation of our development agenda to assist the municipality in alignment of our projects with these investment priorities.
- There is need for rural development guidance, municipal policy is not adequate to address the needs of the rural communities in order to prevent the creation of poverty pockets,
- Clear guidelines on dealing with development applications / proposals outside of the approved urban edge, as well as pressure for housing provision in rural areas, outside the urban edge (which would ideally include clear guidance on how to go about developing Agri-Farms and/or Agri-Parks).
- Incorporating the necessary environmental considerations into MSDFs and urban edges; possibility obtaining exemption from NEMA in strategic development areas; more clarity with regards to environmental considerations and approvals required, and which datasets are relevant (e.g. CBAs) .
- Provide up-to-date data on demographics, population growth figures, housing demand, employment figures etc

They indicated that regional challenges that they would like to see addressed in the District SDF were as follows:

- Unemployment and housing provision are major challenges, specifically the uneven distribution of housing across George municipality. New housing models need to be developed that allow for better social integration. The poor quality of subsidised housing also places strain on municipal resources as they require continued maintenance, as they are not resilient to climatic and environmental incidents.
- Uncontrolled growth – influx of mainly low-income, unskilled workers especially from the Eastern Cape. How to accommodate or discourage this growth?

Big ideas put forward for strengthening the regional economy and / or well-being of the people included:

- Railway transportation is specifically under-utilised and there is a need for a regional public transport system to reduce dependency on private vehicles and calm congestion.
- Agrarian assets should be identified and optimised to preserve these valuable resources and ensure productive yields from them.
- The role and function of the local university is under-utilised
- Strengthen the tourism industry within Eden District in order to create tourism opportunities year-round – increased protection of environmental resources in order to realise the potential of the environment as the economy.
- Cross-Municipal public transport initiatives – the state of the existing railway infrastructure in the Eden District, especially between Knysna and Mossel Bay, should be investigated, as it holds immense potential for the District, especially in terms of tourism (and also bulk goods / waste transit)

The local planners identified the following big changes in terms of settlement, economic development, mobility, environmental dynamics since 2009 as follows:

- Subsidised housing is continually developed on the periphery of settlements, which results in a continuation of segregated urban patterns. There is a need for innovative ideas that promote infill development.
- The influence of the coastal management by-laws and set backs on the MSDF and decision making is not yet known. The intention is to incorporate these into the revised SDF, however the final documents are required.
- Climate change is threatening the unique character of the Garden Route – including lush forests and the pristine coastline. The effect of climate change needs to be clearly understood in order to develop mitigation and adaptation measures in terms of creating more resilient human settlements and preserving the natural environment. Improved disaster management measures, especially with regards to fire and drought prevention and response are in order. However, the changing climate has also resulted in new opportunities, such as the emergence of wine estates in Plettenberg Bay, which should be optimised.

Institutional

- There should be vertical and horizontal integration between the various spatial planning documents and projects, such as water and waste transfer.
- Provide a coherent spatial rationale for alignment and prioritisation with national and provincial projects to increase the prospects of securing grant funding.

Settlement

- Provide guidance to achieve a better balance in the distribution of housing projects across the region to avoid escalating the unemployment rate, especially in areas where municipalities are having difficulty managing indigent dependents. Identify strategies

to promote self-sustainability and empowerment of these communities.

- Provide a strategy to counter the concentration of poverty through poorly located housing projects. Alternatives need to be made to promote a more integrated socio-economic gradient and offer local residents the opportunity to upgrade their lifestyle or living quarters without having to relocate.
- Provide guidance on ways to address the inferior quality of services and infrastructure in subsidised housing development that increases the vulnerability of communities to climatic and environmental incidents. It also weakens the financial resilience of municipalities, as the burden of maintenance falls upon the municipalities that need to secure funding to rectify the shortcomings of the systems installed.

Economy

- The economic potential of tourism in the area is not realised to its full potential. This is a result of the seasonality of trade in the region and the ease of accessibility. Access to and the affordability of air and rail travel should be addressed to boost both local and international tourism and there should be a greater commitment to attract and support regional amenities. All spheres of government should play a facilitative role.
- Agrarian assets need to be optimised and the sector should be aggressively promoted to raise levels of employment. The SDF should provide criteria for identifying prime agricultural assets and strategies to preserve these assets and to ensure productive yields from them. This links with development of rural settlements and bringing labour closer to their places of employment. Ensuring that infrastructure, transport and support is effective and adequate to support localised agri-industries
- Efforts should be made to expand the status and function of the local university. Eden District can attract more students and embark on initiatives to induce interest and investment in the innovation

sector and consequently create employment opportunities in the quaternary sector

- Knysna aims to economically move away from traditional forestry to tourism and education.

Infrastructure

- Provide clarity on the future of the N2 by-pass. The N2 corridor is a scenic route and there should be uniform guidelines as to what type of development should be permitted next to it.
- There should be a network of waste transfer sites, especially if the Mosgas site is to be used.
- Water storage capacity challenges need to be addressed at regional level.
- Knysna's sewerage works is beyond capacity, especially in the northern areas. There is no treatment capacity to serve the projects in their settlement pipeline.
- Consider the viability of a Public Private Partnership (PPP) to revitalize the choo-choo train
- Provide guidance on the location of regional cemeteries.

The District capacity support team and DEA&DP have been engaging with Kannaland, Bitou, Oudtshoorn and Hessequa and the following issues were raised:

- It is necessary to consider the potential of small craft harbours, such as Stillbaai, and the opportunities offered in their redevelopment
- The District SDF should take note of the Coming Together Urban Regeneration project
- The possible relocation of the Oudtshoorn airport and redevelopment of the site for mixed use infill development is of regional significance and should be considered in the SDF
- There is need for guidance on the viability and support of rural hamlets, clarifying their role within the District

3. Annexure 3

3.1. Comments and Responses

1. The Economy is the Environment					
No.	Comment	Source	Applicable to the SDF	Response and amendments to SDF where applicable.	Agency / Process Best Suited to deal with comment
1	Chapter 3 and 4 does not give enough attention given to tourism in the document.	Allan Rhodes (DEA&DP)	Yes	<ul style="list-style-type: none"> The SDF has expanded upon this, including building on the economic value of tourism highlighted in the Mossel Bay Growth Options Study. 	The SCEP process has developed a tourism development strategy.
2	Need guidelines related to agricultural land and the potential for economic opportunity	Allan Rhodes (DEA&DP)	No	<ul style="list-style-type: none"> The SDF has expanded on the relevant policies and principles for the appropriate and sustainable use of agricultural land, but as it does not have land use management delegations it cannot prescribe how these should be applied. Reference should be made to WCG DEA&DP Rural Development Guidelines 	The DEA&DP Rural Development Guidelines Department of Agriculture
3	I am concerned about the future sustainability of service delivery in “rural communities” of Eden District – I do not believe DRDLR’s “Eden Rural Masterplan” fully addresses this issue (it merely focused on Agriculture and disregarded other opportunities like Tourism, ICT, Film Industry, Cross Cape Cycle route, etc) and I believe the Eden SDF should include specific proposals in terms of projects and initiatives to support the dire need for new and innovative economic opportunities to sustain local communities at small / rural nodes like Uniondale, Haarlem, Sinksabrug, Hoekwil, Harold, Karatara, Zoar, Friemersheim, Gouritz, etc – especially in terms of ICT roll out and LED support	Eduard Lotz (Eden District Municipality)	No	<ul style="list-style-type: none"> The Eden SDF has referred to and adopted the WCG Guidelines for Rural settlements. The growth management section outlines sustainable options for the economic resilience of rural settlements. This includes reference to precedent for appropriate development in rural centres drawn from KZN and global precedent. Affordable access is a key factor in economic resilience in rural settlements and this is addressed in Strategy 2 (regional access). The comment and policy position of the Dept of Agriculture on developments such as the Sinksabrug project have been incorporated into the SDF. The meaning of “complete towns”, “consolidation” and “growth” have been elaborated in the SDF and included in a glossary of terms. The RSIF and SCEP processes deal in more depth with the range economic and investment strategies that can be adopted in Eden. The SDF’s mandate is to frame the spatial opportunities, risks and impacts of spatial growth approaches in line with SPLUMA and associated legislation. 	
4	The Map “Environment and Cultural Landscapes”, should provide an indication of the SPC’s for rural development management and agriculture	Allan Rhodes (DEA&DP)	Yes	<ul style="list-style-type: none"> This has been amended in the SDF 	
5	Are there any suggestions / guidelines for the protection of agricultural land with high-potential for increased food security, economic diversification, and agri-processing?	Allan Rhodes (DEA&DP)	No	<ul style="list-style-type: none"> The SDF have expanded on recommendations on the protection of agricultural land in line with the Agricultural Land Act 70 of 1970 and Conservation of Agricultural Resources Act 43 of 1983 (In line with the letter from WCG Agriculture, dated 2017.10.09 in response to Proposed Misty Meadows Agricultural Estate & Agri-village) The SDF has highlighted the importance of food security and made reference to national and international literature. The SDF has expanded on the principles of food security and noted the expanded range of crops as a point of principle. At the District scale, an SDF with a long-term focus should not start to specify crop types. Underscores the need to protect agricultural land as described in the Subdivision of Agricultural Land, Act 70 of 1970 Importance of creating resilience with regards to risks. Top 5 Risks in WC are 1. Corruption, 2. Water crisis, 3. Unemployment, 4. Crime, 5. Lack of leadership. (IRMSA 2017 Risk Report) Food systems and Food security for the City of Cape Town (July 2014) states that food wastage is around 30-50% which indicates that food security has an important distribution factor. 	SCEP’s agricultural value chain working group should provide guidance on the economic viability of current and future agricultural products
6	Guideline 1.1.1 states that new investment in rural areas should not compromise existing farming activities. It should also not compromise potential farming activities.	Malcolm Fredericks Danie Swanepoel			
7	Under policy 1.3 The products listed here are mostly the traditional products cultivated. From the current list, fruit and livestock are the only products that constitute food, however there are no staples produced. The possibilities and feasibility of exploring the possible broadening our production and expanding it to products that could actually make a more significant contribution to national food security should also be addressed. If there is potential to render the production from our agrarian assets more relevant in terms of national demand it would surely contribute to developing a more sustainable sector.	Delia Power (George Mun)	Yes		
8	Section 5.1.2.1 The last sentence “indigenous species loss is expected to decrease, making fires more frequent and harder to cope with” needs to be rephrased, as it can be interpreted	Malcolm Fredericks	Yes	<ul style="list-style-type: none"> SDF has been amended to incorporate comment. 	

	incorrectly. This sentence should read: Indigenous species loss is expected to increase, making fires more frequent and harder to cope with	Danie Swanepoel (DEA&DP)			
9	The Gouritz corridor should be renamed the “Gouritz Cluster Biosphere Reserve”. The Garden Route Biosphere Reserve is not mentioned in the draft SDF.	Malcolm Fredericks Danie Swanepoel Maretha Alant (SANParks)	Yes	<ul style="list-style-type: none"> The SDF has been amended to refer to the Gouritz Cluster Biosphere Reserve The SDF has expanded upon the Garden Route Biosphere Reserve in the SDF 	
10	It is not clear whether the Garden Route Biosphere Reserve is included as part of the Eden to Addo biodiversity corridors, which connects the Western Cape and Eastern Cape Along the coast	Malcolm Fredericks Danie Swanepoel	Yes	<ul style="list-style-type: none"> The SDF maps and narrative have been amended to incorporate this comment. 	
11	Eden District has industries such as PetroSA, which provides economic opportunity. Should the development of shale gas in the central Karoo proceed and be successful, there may be an opportunity to revitalise PetroSA, rather than developing a new refinery in the Eastern Cape or on the West Coast.	Malcolm Fredericks Danie Swanepoel	No	<ul style="list-style-type: none"> From a cultural landscapes and water perspective, the cost benefits are highly debatable, especially in the light of recent moderation in the scale of the gas reserves. The SDF cannot address this until exploration findings have been concluded. 	RSIF / Provincial and National energy strategies are appropriate forums to address this comment
12	An EIA to conduct a 3D seismic survey in order to explore for oil / gas reserves along the PLETMOS basin off the Bitou coastline is currently underway. The company conducting the EIA is SRK Consulting in Port Elizabeth. This could be a significant future development for the SDF to take note of – although I guess it depends whether any reserves are found.	Marcel Minnie (Bitou Municipality)	No	<ul style="list-style-type: none"> This issue relates to ongoing investigations by PetroSA SDF can't respond until there are facts, such as viable reserves available 	The SCEP Working Group on Oil and Gas
13	A limitation is that ecological corridors were not mapped and it was one of the ‘Big Ideas’ discussed as the Vision Session. If conservation corridors and open space systems are not represented spatially they can be further fragmented and potentially ignored during the decision-making process.	Maretha Alant (SANParks), Colin Fordham (CapeNature)	Yes	<ul style="list-style-type: none"> The SDF has mapped the ecological / conservation corridors and open space systems at a regional scale. The note regarding groundtruthing of the CBA's needs to be actioned to enable B-Municipalities to incorporate these into the SDFs and LUMS 	DEA&DP

14	Although there is support for the two regional identities in terms of the positive outcome thereof for the region it must be noted that very few details appear in the SDF relating to the so called “in between areas” of the district, the areas that are linked on the two identities.	Hendrik Visser (Kannaland Municipality)	No	<ul style="list-style-type: none"> There are no in-between areas at the two distinct landscapes have been determined according to municipal boundaries 	
15	The word “region” or “regional” is used very often in the report. It is quite an ambiguous term, and is used interchangeably with the word “district”. SPLUMA defines a region as follows: “region, in relation to a regional spatial development framework, means a circumscribed geographical area characterised by distinctive economic, social or natural features which may or may not correspond to the administrative boundary of a province or provinces or a municipality or municipalities”. The Eden SDF is a district SDF, not a regional one. However, certain parts of Eden might function as a region, especially the area comprising Mossel Bay, George, Oudtshoorn, Knysna and Plett. What constitutes a “region” in Eden has not been clearly defined in the SDF, and is therefore open for interpretation. Its use should therefore be avoided, in my opinion, or should be clearly defined (there might even be more than one regions in Eden). I would rather refer to the Eden District, or the Garden Route / Klein	Marcel Minnie (Bitou Municipality)	Yes	<ul style="list-style-type: none"> This has been amended in the SDF 	

	Karoo, depending on whichever part of the district is referred to.				
16	Contractual National Parks should be included as a mechanism for biodiversity conservation on private land. In addition, zoning of private properties to Open Space III could be used as a mechanism for conservation in terms of the 2016 DEADP Standard Draft Zoning Scheme By-Law. Financial and non-financial incentives could be linked to conservation on private land with title deed restrictions. Please add Contractual National Parks to Protect and conserve Eden's important terrestrial, aquatic and marine habitat guideline, as a mechanism for formal protection.	Maretha Alant (SANParks) Colin Fordham (CapeNature)	Yes	<ul style="list-style-type: none"> Introduce Contractual National Parks as a mechanism for biodiversity conservation on private land The SDF has made a clear statement on open space supplemented by international / Ethekewini MOSS precedent adopting incentives for protecting and managing open space The Implementation Framework includes a recommendation for zoning scheme amendments in B-Municipalities 	
17	The Garden Route National Park (GRNP) boundary is incorrect in Figure 12. The dotted green line is the buffer zone of the GRNP. The Garden Route Landscape along the N2 is confusing as roads are not green corridors. Ideally, a credible open space system and ecological corridor network should be spatially represented in the map.	Maretha Alant (SANParks)	Yes	<ul style="list-style-type: none"> The SDF reflects the corrected GRNP Boundary on map and legend 	
18	The Biodiversity Corridor map should be revised. National Parks, Nature Reserves, related Marine Protected Areas and Biosphere Reserves should be mapped. Referring to Wilderness (green) is vague. The map needs to focus on Eden District specifically.	Maretha Alant (SANParks)	Yes	<ul style="list-style-type: none"> The SDF includes the requested amendment 	
19	The Garden Route Landscape (green) does not reflect the level of transformation clearly and insinuates a predominantly green area, which is not the case. Alien vegetation and transformation by urban development, plantations and agriculture is not highlighted. The benefit of removing alien vegetation is not only to reduce the risk of wild fire, but also to increase the availability of water	Maretha Alant (SANParks)		<ul style="list-style-type: none"> The SDF clarifies that the intention is to rehabilitate biodiversity areas / aligned with alien veg clearance programmes etc The SDF makes reference to the DEADP recommendation that the benefit of removing alien vegetation is not only to reduce the risk of wild fire, but also to increase the availability of water The implementation plan recommends the initiating / expanding alien vegetation clearance programmes (fire risk / reinstating biodiversity links - expanding GRRP initiatives – job creation, reduce disaster risk) 	
20	SANParks does not agree with the Buffer 1 spatial planning category. Extensive agriculture should not take place in Buffer 1 areas.	Maretha Alant (SANParks)	Yes	<ul style="list-style-type: none"> SPC have been defined in DEA&DP Draft Rural Land Use and Management Guidelines and are adopted by the Eden SDF The SDF has been updated to include definitions that align with the Draft WCG Rural Land Use Planning and Management Guidelines (2017) 	
21	The SDF should include the following best practice guidelines: <ul style="list-style-type: none"> No development below 1:100 year flood line No development below the 3m contour line around estuaries No development on primary dune systems. Development should be set back behind the primary dune No development on slopes steeper than 1:4 No skyline development 	Malcolm Fredericks Danie Swanepoel (DEA&DP)	Yes	<ul style="list-style-type: none"> The Draft SDF has included the draft coastal management lines and will update these lines when the final report CML report is made available. The SDF Implementation Framework recommends that B-municipalities take account of the 1:100 year floodline in the preparation of their SDFs, updated LUMS and in consideration of applications The SDF has included the draft coastal management lines as the final CML were not made available at the time of finalisation The SDF has included information on coastal access points 	The B-Municipalities will need to update their SDFs once the final CMLs are available.
22	The Draft Eden Coastal Management Lines are available and should be referenced and included where appropriate throughout the entire document. The project also included an audit of all coastal access points along the coastline. This data could be obtained from the Department of Environmental Affairs and Developmental Planning (DEA&DP) Coastal Management unit.	Colin Fordham (CapeNature)	Yes		
23	Guideline 1.4.6 and 1.4.7 that deals with fire management, does not fit nicely under policy 1.4 that deals with inclusive and equitable public access to the coastline and estuaries.	Malcolm Fredericks Danie Swanepoel (DEA&DP)	Yes	<ul style="list-style-type: none"> The SDF has relocated the reference to the fire management policy as suggested The benefits of removing alien vegetation have been elaborated The implementation framework includes recommendations in relation to Eden DM disaster management's role in approving developments that impact on fire 	

24	It should be noted how inappropriate poorly timed fire burning regimes increases the risk of fires. When land owners do not burn fynbos at the correct intervals, the increase in fuel load increases the fire risk and indirectly lowers the biodiversity value of the unit. A reference for obtaining details regarding such information is the Fynbos Forum Ecosystem Guidelines for Environmental Assessment in the Western Cape.	Colin Fordham (CapeNature)	Yes	<ul style="list-style-type: none"> risk. The SDF recommends reference to the Fynbos Forum Ecosystem Guidelines for Environmental Assessment in the Western Cape for Fire Management principles The SDF Implementation Framework recommends the establishment of a fire management “agency” 	
25	Policy 1.3 acknowledges that Eden District is the “breadbasket of the Western Cape with untapped potential”. Is Swartland not the breadbasket of the Western Cape? Where is this “untapped potential to expand and grow rural products”? Many farmers struggle to make a living with increasing input costs and lower prices for the products (“cost squeeze”) and the associated risks such as drought, wild fires, flood damage etc. Note that rooibos is not grown in Eden District – it should be replaced with honeybush.	Malcolm Fredericks Danie Swanepoel (DEA&DP)	Yes	<ul style="list-style-type: none"> The SDF has been amended to refer to honeybush not rooibos The SDF has been amended to refer to Eden as the “food basket” of the western Cape (fruit and vegetables) in relation to general food security concerns. In terms of legislation, the Eden SDF is required to address to long term food security at a regional scale. It cannot meaningfully go beyond to demarcating agriculturally productive land and recommend it’s protection in the planning frameworks and LUMs systems of the B Municipalities. The SDF makes reference to the Department of Agriculture policies. the Agricultural Land Act 70 of 70 and Conservation of Agricultural Resources Act 43 of 1983 . There is a Draft Preservation and development of Agricultural land Bill (2016) 	SCEP’s agricultural value chain working group should provide guidance on the economic viability of current and future agricultural products
26	The Western Cape Biodiversity Sector Plan (WCBSP 2017) has replaced the Western Cape Biodiversity Framework (WCBF 2014). It is recommended that the document be updated throughout (where required), referencing the new plan. CBA data has been refined and updated. There is also a Land Use Advice (LUA) Handbook (Pool-Stanvliet <i>et al.</i> 2017), which should be used and referred to throughout the document.	Colin Fordham (CapeNature) Maretha Alant (SANParks)	Yes	<ul style="list-style-type: none"> The SDF has been updated to include the New CBA data 	
27	It is recommended that the section 5.3.6, guideline 1.1.2, should mention how appropriate land use of CBA and ESA regions could contribute to environmental ecosystem protection and enhancement	Colin Fordham (CapeNature)	Yes	The SDF has expanded on this and provided more detailed recommendations (with reference to the Mossel Bay Growth Options Study)	
28	The Draft Eden Coastal Management Lines are available and should be referenced and included where appropriate throughout the entire document. The project also included an audit of all coastal access points along the coastline. This data could be obtained from the Department of Environmental Affairs and Developmental Planning (DEA&DP) Coastal Management unit.	Colin Fordham (CapeNature)	Yes	<ul style="list-style-type: none"> The Draft SDF has included the draft coastal management lines and will update these lines once the final report CML report is made available. Information has been included on coastal access points 	
29	Climate Change needs to feature more prominently in the Eden SDF – especially in terms of the potential long term impact thereof on Agriculture, Environmental, Natural Resources.	Eduard Lotz (Eden District Municipality)	Yes	<ul style="list-style-type: none"> SDF has expanded and clarified in more detail and made reference to WCG Climate Change resilience report (agriculture, rainfall, biodiversity, water supply) 	
30	In Section 5.1.3.1 it is stated that water supply planning and coordination across municipal boundaries, specifically between capacity constrained Knysna, Hessequa and Bitou is a district mandate. The feasibility of a water transfer scheme between municipalities could be considered, but the statement quoted above should not create the impression that it is supported without having all considered all relevant factors, including cost, feasibility etc. Heidelberg and Plettenberg Bay are 250 km from each other and a bulk water transfer scheme may not be feasible. It remains uncertain as to how the notion to limit urban sprawl will be influenced by what the district aims to achieve in terms of its spatial drivers and approach, which is directed towards regional accessibility for inclusive and equitable growth. The development and integration of resource infrastructure (e.g. Cross municipal supply of water) may create expectations where development cannot be accommodated due to real limiting factors, such as water supply and regional waste and transport infrastructure developments	Malcolm Fredericks Danie Swanepoel (DEA&DP)	Yes	<ul style="list-style-type: none"> The SDF recognises the financial and operational realities and constraints of distance within the region. It recommends a regional perspective on infrastructure capacity across services. The CIF section of SDF expands on the need to assess the medium and long-term capital and operating impacts The Implementation Plan recommends the preparation of a District level CIF that assesses the capital and operating impacts of a range of local versus regional solutions. This should align with the regional water masterplan to be developed, guide infrastructure investments and assess cost-benefit trade-offs between different technologies and solutions within the region. 	

	The SDF should highlight where development is appropriate and where biodiversity conservation should be encouraged.	Maretha Alant (SANParks)	Yes	<ul style="list-style-type: none"> The SDF reiterates the cos-benefits and environmental benefits of compact growth, emphasising infill strategies that also optimising existing infrastructure SDF adopts the WC DEA&DP guidelines for rural land use development. 	
31	Policy guidance for open space systems and ecological corridors should be added to safeguard against the erosion of biodiversity and the functionality of ecosystem services. Guidelines for alien clearing and wetland rehabilitation should also be included as new Policy Actions.	Maretha Alant (SANParks)	Yes	<ul style="list-style-type: none"> The biodiversity network is not groundtruthed, nor is it the role and mandate of a District SDF to demarcate biodiversity corridors. The SDF outlines principles for open space systems and ecological corridors (in line with Mossel Bay Growth options and best practice drawn from Ethekweni) The SDF has included guideline diagrams The Implementation Plan: Guidelines have been provided for adoption by B-Municipalities as part of their SDFs and LUMS The SDF's Implementation Plan recommends that a study is commissioned to the groundtruth of the ecological corridors Responsibility: SANParks/ DEA&DP 	Once the Biodiversity network has been groundtruthed, the demarcation of the corridors should be part of the SDFs of the B Municipalities
32	Add a few paragraphs about the two Biospheres which cover much of the District and were not officially proclaimed when the last SDF was written	Errol Finkelstein (Garden Route Biosphere Reserve)	Yes	<ul style="list-style-type: none"> The SDF links and clarifies the 2 major character areas with the proclaimed Biospheres 	

2. Regional Accessibility for Inclusive and Equitable Growth					
No.	Comment	Who	Applicable to the SDF	Response and amendments to SDF where applicable.	Agency / Process Best Suited to deal with comment
33	Section 5.1.2.2. – A CNN Travel poll has voted the R62 as the number one road trip destination in the world. This should be acknowledged in the SDF. The proposed upgrading of the R62 will be to the detriment of the tourism appeal of the route , as an increase in traffic and heavy vehicles will make the road less attractive to those looking to enjoy the scenic and tourism aspects the route has to offer. Maintaining the current scenic and tourism nature of the route should be at the forefront when considering possible upgrading options	Marcel Minnie (Spatial Planner Bitou Municipality)	Yes	<ul style="list-style-type: none"> The SDF has highlighted that the R62 and N9 need to be upgraded to provide an alternative regional access route for tourism and freight. The cost of realigning the N2 is prohibitive in relation to the forecast fiscal constraints at National and Provincial levels. Given the need to conduct EIA processes, it is unlikely to be realised within the validity period of this SDF. The SDF development strategies cannot be tied to this highly uncertain, costly solution and alternative options have been offered to address regional accessibility The SDF recognises that the re-alignment of the N2 in Plettenberg Bay is going ahead with to provide a minimum of two lanes in either direction between Plettenberg Bay and George. The current position taken was to include a response to congestion (upgrading of the R62) 	The PLTF should provide guidance on the wider regional cost-benefits of the N2 in relation to investments in rail and improvements in alternate routes such as the R62/ N9
34	The report does not go into any detail with regards to SANRAL's intentions for the N2 national route, in terms of planned upgrades to the existing route, or constructing the "new" route which has been on the cards since the 1970's. The implications of these proposed upgrades in terms of time frames, the possibility and location of new toll gates, etc. are important for planning on a district-wide scale	Marcel Minnie, Eduard Lotz (Eden District Municipality) Rivaaj Mahabeer (DTPW)	SANRAL workshop took place after the Draft SDF was sent out for comment	<ul style="list-style-type: none"> The SDF highlights the negative impacts of freeways / the N2 on the cultural landscape drawing evidence from the Mossel Bay Growth Options study. The SDF has made recommendations at a strategic level to address regional accessibility for tourism and freight in relation to cost-benefit and fiscal constraint realities. The focus on the R62/N9 as an interim solution to this reality suggests appropriately designed upgrading of the R62 to deal with the short period of seasonal congestion on sections of the N2 during peak season. 	
35	The draft Eden SDF states the following: " <i>The R62 will be able to serve business, freight and tourism through traffic</i> ", but does not provide any details regarding the proposed upgrading – should it be one lane in each direction with generous shoulders, or two lanes in each direction? Whether or not the R62 is upgraded, the Knysna N2 bypass is the single most important factor for improving district-wide accessibility in my opinion (passing through Knysna during tourism season is a huge problem).	Marcel Minnie (Bitou Local Municipality)	Yes & No	<ul style="list-style-type: none"> The use of the R62 as a tourism and freight route, is not be considered as being mutually exclusive if upgrades are appropriately designed and the SDF provides guidelines in this regard. The Implementation Plan of the SDF recommends that the Eden ITP to prioritise the relevant road improvements. The SDF does not detail the number of lanes, this needs to be dealt with in a revision of the Eden ITP 	
36	Section 5.1.2.2 acknowledges that the Draft SDF points out regional road linkages and constraints, especially national access routes (N1 and N2) that allow North-South access and their inability to connect along the East-West lines. However it needs to be pointed out that East West access could also be problematic, especially under sever fire constraints, considering the recent Knysna fire disaster, where access to and from the eastern and western cape was completely cut off for emergency vehicles and the public. This confirms that there is no alternative access into Knysna from both the eastern and western side and as such highlights the need for an alternative by-pass along the coast. The spatial strategies and proposals in this regard are not very specific, although the need is expressed	Malcolm Fredericks Danie Swanepoel (DEA&DP)			
37	The SDF does not make any suggestions as to how the existing rail infrastructure can be revived and exploited to the benefit of the District and the possible means and arrangements to achieve such. It is suggested that the SDF should explore various	Marcel Minnie (Bitou), Allan Rhodes (DEA&DP)	Yes	<ul style="list-style-type: none"> The SDF has included a rationale for supporting rail as the backbone of the coastal economic centres linking Saldanah and Richards Bay The SDF highlights the costs and financial viability challenges 	The Eden ITP, WC Infrastructure Plan and National Rail Plan should investigate the cost-benefits of rail versus road as a sustainable means to connect the coastal settlements that contribute significantly to

	funding models beyond subsidies that will facilitate the rehabilitation of rail infrastructure.	Rivaaj Mahabeer (DTPW)		associated with rail and re-emphasises the need for thresholds in order to support the viability of new rail infrastructure.	the national GDP.
38	It is stated that the main rail line terminates in Oudtshoorn. It should be noted that there is a Branch Line from Mossel Bay, through George, Oudtshoorn and Klipplaat to Port Elizabeth. Whether it is operational, is not clear. Branch lines from George to Knysna and from Oudtshoorn to Calitzdorp.	Malcolm Fredericks Danie Swanepoel (DEA&DP)	Yes	<ul style="list-style-type: none"> However the SDF also emphasises the national role and the economic potential of connecting the coastal cities from CT to Richards Bay. Impacts on Eastern Cape. 	
39	Section 3.3.5.4 The Mossel Bay Airfield is to be developed as the Mecca for general aviation in the Southern Cape . A 30-year plan is in the process of being drafted in order to accommodate a hanger, training, maintenance, educational facilities etc. Mossel Bay is not prepared to stand in line with smaller airports, which will probably never be developed.	Jaco Roux (Mossel Bay Municipality)	No	<ul style="list-style-type: none"> Only George airport has a commercial ACSA function The other airport upgrades are private sector initiatives relating to commercial (flight school) operations. The SDF supports development of Mossel Bay Airfield and it is already aligned with the SDF. The SDF supports the development of Mossel Bay and Oudtshoorn Airfield as long as there is no intention to compete with the George airport for its commercial ACSA function. 	.
40	A range of different airport upgrades proposed. Is there a need for such? Why and how? Is the sharing of resources an option between these settlements (twin city concept)?	Raynita Robinson (DHS)	No		
41	Access to inland service centres for rural settlements with no economic base needs to be addressed. Establish formal definitions and guidelines for settlements of different sizes and characteristics	Allan Rhodes (DEA&DP)	Yes	<ul style="list-style-type: none"> The SDF has included definitions and guidelines for settlements of different sizes in Policy 3.4 "Plan and invest in relation to hierarchy" 	
42	There seems to be a contradiction between guidelines 2.1.10 and 2.1.11 as the former directs decision makers to consider the use of bypasses, yet the latter explicitly states that no bypasses will be used. It is recommended that clarity be provided in this regard. Also – the bypass is being considered in several sections of the N2, notably Knysna and Plettenberg Bay.	Allan Rhodes (DEA&DP) Malcolm Fredericks Danie Swanepoel	Yes	<ul style="list-style-type: none"> The SDF has provided clarity related to Bypasses in the District (see above) 	
43	Section 5.1.3.4: The Eden District is not land locked, although it may have limited east-west routes in and out of the region.	Malcolm Fredericks Danie Swanepoel	Yes	<ul style="list-style-type: none"> The SDF has clarified that reference to being "land locked" relates to the limitation in air access into and out of the District 	
44	To propose the upgrading of the Swartberg Pass between Oudtshoorn and Prince Albert (to increase north-south linkages, which I agree with in principle) is not something to be taken lightly. It has national monument status, and the scenic and tourism appeal of the pass, taking into account its historical and architectural significance, should be preserved. Much of the appeal of the pass lies in the very fact that the road is untarred, which may be lost if the road is ever tarred. The N12 from Oudtshoorn through De Rust / Meiringspoort to Beaufort West would be a more sensible north-south linkage in my opinion, as the Meiringspoort pass is already tarred.	Marcel Minnie (Bitou Local Municipality)		<ul style="list-style-type: none"> Maps have been amended accordingly 	
45	In terms of future spatial direction, it is also critical that the SDF come up with proposals that will rectify and address alternative access / exit routes into and out of existing settlements such as Pacaltsdorp and many other small suburbs within the District, which have only one entry / exit point in an attempt to mitigate the	Malcolm Fredericks Danie Swanepoel	No	<ul style="list-style-type: none"> The SDF must focus at a regional scale and it addresses improved regional accessibility. In addition the SDF sets clear principles for improving local accessibility, providing guidance in relation to containing the lateral spread of settlements and improving street networks to improve walkability. 	The detailed planning of local area access routes should be dealt with in the ITPs and SDFs of the B Municipalities

	apartheid spatial exclusion as part of the consolidated SDF				
46	I did not note any proposals regarding ports and harbours in the SDF. I would like if the viability of developing such in the various coastal Municipalities could be explored (in terms of the requirements of a harbour – minimum water depth, supporting infrastructure and industries, etc. and possible locations for and roles of such). What about the possibility of a high speed ferry between PE and Cape Town, picking up passengers at major towns along the way? Or a cruise liner stopping offshore at Plett / Knysna, with passengers being on / offloaded by smaller boats?	Marcel Minnie (Bitou Municipality) Malcolm Fredericks Danie Swanepoel (DEA&DP)		<ul style="list-style-type: none"> The SDF has examined the role of the harbours in the SDF. It is not viable to expand the harbour in Mossel Bay Stilbaai is the only proclaimed fishing harbour in the Eden area. A study on development options has been conducted by DPW. The harbour has limited economic impact on district scale economy this point has been noted in the SDF The SDF has recognised The current role and function of the harbours along the Eden Districts coastline is not significant, nor has substantial regional potential been identified. Equitable and Inclusive regional accessibility chapter notes that “The current role and function of the harbours along the District’s coastline is not significant, nor has regional potential been identified.” 	
47	The role that proclaimed small harbours can play in the district economy is not adequately addressed for example the potential of the Stilbaai harbour.	Hendrik Visser (Kannaland Municipality)			
48	In order to contain settlement footprints and land use mix to promote walkability in towns, the effectiveness, efficiency, safety and accessibility of public transport first need to be addressed. Secondly, cycling and walking should be encouraged by the provision of cycling and pedestrian lanes to establish a culture, but also promote it as a lifestyle amongst the public within schools and within the workplace.	Malcolm Fredericks Danie Swanepoel (DEA&DP)	Yes	<ul style="list-style-type: none"> The SDF recommends the promotion of compact walkable settlements as a policy guide to local Municipalities The SDF has included policy statements and best practice examples for dealing with the complex issue of an affordable regional public transport. The SDF notes that the affordability, safety and accessibility of public transport is only possible if sprawl is contained through infill and densification. The District SDF, sets out the principle of balancing investment in public transport and walkability versus cars. The SDF makes reference to the BEPP TOD principles adopted by National Treasury. The Implementation Framework identifies the need for the B-Municipalities to effect TOD principles in the revision of their SDFs, Zoning schemes and by-laws relating to parking provision. 	
49	Reference to the WCED learner transport routes is in order. However, the map does not capture the cross-boundary routes servicing rural schools closer to the Overberg District boundary.	Melodie Campbel (DoE)	Yes	<ul style="list-style-type: none"> The SDF has been updated to reflect the broader learner transport routes. 	

3. Coordinated Growth Management for Financial Sustainability

No.	Comment	Who	Relevance to the SDF	Response and amendments to SDF where applicable	Agency/ Process Best Suited to deal with comment
50	Reference is made to “grow” and “consolidate” coastal and inland centres. These terms need to be explained in more detail and information needs to be provided that states how these strategies can be achieved.	Marcel Minnie, Allan Rhodes	Yes	<ul style="list-style-type: none"> The SDF has expanded on the terminology and provided a glossary of terms to provide clarity 	
51	The District Municipality does not have the capacity to get involved with municipal planning. The placement of social facilities or the criteria for the approval of high income settlements and spatial limits of growth is to be defined in local municipal SDFs.	Jaco Roux (Mossel Bay Municipality)	Yes	<ul style="list-style-type: none"> The District must co-ordinate transport, infrastructure and tertiary facilities and is responsible for disaster management. The regional distribution of these elements impacts on regional transport, infrastructure co-ordination and disaster management, all of which are District Mandates. The SDF Implementation Framework recommends that capacity is built within the District to enable active participation in approval of all planning applications and co-ordination of placement of social facilities. The District SDF adopts the WCG DEA&DP guidelines regarding the location of social facilities these guidelines need to be translated into the SDF and LUMS of local municipalities but also relate to the WCG's planning and investment strategies for the provision and maintenance of social facilities. 	
52	Section 5.1.3.2 Although co-ordinated planning is supported, some towns function well because of timeous planning for infrastructure. The risk in coordinated planning is that all funds will be directed towards struggling municipalities and over time the well-funded municipality will be underfunded and not be able to render effective services	Jaco Roux (Mossel Bay Municipality)	No	<ul style="list-style-type: none"> The SDF's Growth Management Strategy recommends that proper regional co-ordination is essential in relation to the mandates of the District mandates. 	
53	I'm not sure if there is a clear picture in terms of the alignment of infrastructure planning in support of priority Spatial Development areas and I would like to see specific proposals that are relevant to key Infrastructure projects to be pursued to ensure sufficient Bulk and Link service capacities in support of such areas. Perhaps you can also add to your list on page 19 of Chapter 6 the following relevant mandates: Bulk supply of water, Bulk sewage purification works and main sewage disposal, Regulation of passenger transport services, Municipal public works relating to any of the above functions or any other functions assigned to the district municipality	Eduard Lotz (Eden District Municipality)		<ul style="list-style-type: none"> Mandates have been updated as recommended. The SDF makes a clear recommendation for Eden District to develop and manage a Capital Investment Framework. This needs to connect the District Infrastructure Framework so that infrastructure capacities, proposed development and backlogs can be aligned and costed. The SDF Implementation Framework recommends the urgent development of a District Fiscal Impact tool linking the Long term financial plans of the municipalities with the Eden District infrastructure masterplan. 	Eden DM Finance and Infrastructure Planning Directorate needs to be part of the development of a CIF. The Long Term Financial Plans and Provincial Plans and budgets must also be actored into the District CIF.
54	Section 5.1.3.3 The source of income in local municipalities is not covered. In the case of Mossel Bay, holiday houses generate a large proportion of income in the municipality. These are located near the sea in low density areas. How would this change within a high density environment? In Hessequa, the most profitable area in their municipality is Stillbaai, because it consists mainly of holiday houses. Densification must be implemented in such a way to increase income and efficiency, without having a negative effect on municipal income. The SDF must evaluate the risks of densification in relation to municipal income	Jaco Roux (Mossel Bay Municipality)	Yes	<ul style="list-style-type: none"> The SDF Growth Management strategy is founded on the more effective use of land. Evidence shows that low density, remote, high income developments do not cover their long term operating costs. The SDF also provides evidence of how more efficient use of land improves municipal revenues (rates per square meter). There is no evidence that densification improves municipal costs. 	

				<ul style="list-style-type: none"> Furthermore, property values are declining as a result of the economy and many people are selling their second homes. People are also subdividing to reduce unaffordable rates and levies. The risk of density therefore needs to be re-evaluated. 	
55	Policy 1.5 Proposal that no further development except for existing land use and primary rights, infrastructure upgrading, maintenance, coastal access, walkways and public facilities is permitted is a very restrictive statement. It is a reality that municipal infrastructure is located next to the sea and upgrading of parking areas, services and walkways will have to be done. Legislation changes over time and municipal infrastructure must adapt. New municipal infrastructure must be located within the coastal setback line.	Jaco Roux (Mossel Bay Municipality)	Yes	<ul style="list-style-type: none"> At the time of SDF finalisation the final coastal edge line was not available. The SDF clarifies the applicability of the final coastal set back line in relation to the B Municipality SDFs The principle of no development is set in NEMA and therefore not discretionary. 	
56	It is suggested under policy 1.5 that “no further development is permitted within this coastal management line” Kindly note that the provisions that will apply to the coastal management line must still be determined	Malcolm Fredericks Danie Swanepoel		<ul style="list-style-type: none"> In relation to Climate Change and Disaster Risk the District is obliged to mitigate future coastal flooding and storm risks. The Implementation framework recommends the incorporation of final coastal setback line in B-Municipality SDFs and LUMS 	
57	Chapter 3 and 4 does not give enough attention to waste in the document.	Allan Rhodes	Yes	<ul style="list-style-type: none"> The SDF has expanded upon this in the document The Food system and Food security Study for the City of Cape Town highlights food wastage between 30-50%. This implies that through improved distribution systems waste can be reduced as well as the viability of waste separation for organic waste. 	
58	It is worth querying the reasons as to why Riversdale has been marked for growth. How is this justified? Consider including an explanation or justification for these proposals in the text.	Allan Rhodes (DEA&DP)	Yes	<ul style="list-style-type: none"> The SDF recommends that Riversdale and Oudtshoorn’s capacity to accommodate growth goes hand in hand with the recommendation to upgrade the R62, as this proximity is likely to improve its economic prospects. The SDF outlines guidelines for the full hierarchy of settlement types 	
59	It is not clear why Oudtshoorn is marked as “grow inland centre” when the population of the town is expected to decrease by 5000 people	Allan Rhodes	Yes		
60	The role of lower order urban centres in regional development cannot be ignored. A renewed emphasis must be placed on the development role of small towns in rural areas.	Hendrik Visser (Kannaland Municipality)			
61	There is a need for a set of rural development guidelines for small hamlets / rural villages in order to be clear on the approach to basic need and social service / facility provision and the approach to housing delivery and economic stimulation (if any). The inclusion of these guidelines is imperative. Clarity with regards to what investment (if any) is targeted into rural hamlets with little-no viable economic base needs to be clearly addressed and articulated	Allan Rhodes (DEA&DP)	Yes	<ul style="list-style-type: none"> The SDF has highlighted the need for mobile services and increased scholar transport The SDF has expanded on principles for appropriate conditions for investment / expansion of small rural settlements. It also highlights that the expansion of these towns could lead to large fiscal costs that may have the potential to bankrupt the municipality. 	
62	In the case that there is no viable economic base to the settlements, then what is the approach? What about the provision of a basic level of services and the constitutional mandate? Please provide clarity in this regard, possibly in the form of a set of guidelines or in articulating the approach here.	Allan Rhodes (DEA&DP)	Yes No		
63	Include guidelines for densification and articulate the principle as a core component of growth management and sustainability. Provide a nuanced understanding of densification – of graduated density, appropriate and inappropriate density and its link to urban design.	Allan Rhodes (DEA&DP)	Yes	<ul style="list-style-type: none"> The SDF promotes the optimisation of well-located and underused serviced land to reduce the pressure on infrastructure services delivery. The SDF also outlines general principles for a range of infill, intensification and land use rationalisation options. This is supported by references to land use efficiencies and the rates income enhancements that can be achieved by these approaches. 	
64	A more proactive planning approach is required to manage the current sprawling low density settlements, which is driven by subsidy housing projects and private sector expansion, since these are often followed by infrastructure development once already in place.	Malcolm Fredericks Danie Swanepoel	Yes		
65	With regards to the proposal that fences are to be removed around school / playing fields in order to integrate schools into the community. The department’s priority is to ensure and improve the safety of learners and safeguard the assets of the department. While the department supports the concept of integrating schools into the broader community, within the socio-economic context of many South	Melodie Campbell (DoE)	Yes	<ul style="list-style-type: none"> The SDF has been expanded to clarify the financial sustainability challenges faced by the WCG in relation to the maintenance and provision backlog for schools and health 	

	African suburbs, the removal of a school fence without the necessary enforcement in place, might not be the silver bullet to integrate schools into the community. A multi-prong approach is recommended.			facilities. The expansive size and layout of schools makes them very costly and difficult to secure and maintain. At present 25% of the WCG's DoE annual maintenance budget for schools goes into repairing damage caused by vandalism. There is no allocated budget for fencing due to limited funds. So it can be expected that the annual maintenance budget to cover these costs will increase moving forward.	
66	Guideline 2.5.23 deals with the location of social facilities. It states that schools should be clustered so that several schools can share sports fields. This is not practical as it may result in traffic congestion. It would be better to centralise all the schools away from the community. Another alternative would be to extend the school day so that more children can be accommodate and both sports fields and school buildings can be utilised for a longer time. To remove fences from schools would affect the safety of children.	Malcolm Fredericks Danie Swanepoel (DEA&DP)	No	<ul style="list-style-type: none"> The rationale promoted in the SDF is that in place of fences, schools can be edged by infill housing and landscaping in order to reduce the maintenance cost of fences. This will aid in increasing surveillance and as result, will improve safety on school sites In line with the Growth Management strategy the SDF promotes concept of more compact school formats is successfully employed around the world. If schools can share amenities such as municipal and club sports facilities (which are themselves costly to maintain) the sporting requirements of schools can be met in a more sustainable and land efficient manner. The SDF is obliged to align with SPLUMA and its principles that promote integration, resilience and spatial justice. The SDF proposals translated these principles in proposing more compact, integrated and walkable settlements. Such settlement growth has been demonstrated to improve economic performance and inclusivity in towns across the globe. The SDF has included some examples and statistics to support this approach. It would incur great costs to create new schools that are positioned away from communities. This would also increase travel time to schools and create more congestion. Arguably, one of the best qualities of towns in Eden is that they are extremely walkable, which makes these places more liveable and equitable. If schools were to be clustered, this would increase equitable access to quality public facilities, which promotes spatial justice. This is explained in detail in the SDF. The SDF Implementation Framework notes that the WCG DTPW is initiating a the development of pilot schools to test new norms and standards. The SDF recommends that Eden District motivates for the implementation of a pilot school made to DTPW. 	
67	It is also important to note that although the WCED in principal supports the rationalisation of social facilities to ensure the optimal utilisation and availability of social facilities (including schools) in an area, the rationalisation (merger or closure of schools) is subject to the processes and procedures as set out in the SASA. It cannot therefore be presumed that SGBs will necessarily agree to rationalise school premises in order to accommodate alternative uses (such as housing).	Melodie Campbell (Eden District Municipality)			
68	Some of the statistics related to schools in the document needs to be revised, as it is believed that information used relates to Eden and the Klein Karoo. These figures may warp proposals and will need to be fact checked and replaced.	Melodie Campbell (DoE)	Yes	<ul style="list-style-type: none"> The SDF has updated the school statistics as requested 	
69	It is recommended that figure 29 show more than just the housing need, in terms of sustainable growth management. What about capturing the full extent of the policies and guidelines under this theme? It is recommended that the SDF recognize that there is a significant difference between housing need and housing eligibility. What is this map referring to? Consider clarifying.	Allan Rhodes (DEA&DP)		<ul style="list-style-type: none"> The SDF has highlighted the challenges in relation to housing backlogs and the lack of data on the segmentation of demand (into subsidy, social housing, rental, gap and market demand). The growth option strategy aims to improve the affordability of housing by moving from large scale, high cost, peripheral developments to multiple smaller scale developments that can target the large (but unverified) demand for affordable rental housing for students, new job entrants and non-qualifying households that cannot afford market price of housing purchase or rental. The SDF map has been clarified 	

70	It is suggested that the SQ document include a section, which presents a programme for population and household growth, in relation to household size, and the implications for infrastructure, the provision of social facilities, and housing provision over the time span of the SDF.	Allan Rhodes (DEA&DP) Eduard Lotz	No	<ul style="list-style-type: none"> The SDF highlights the need for a District wide infrastructure and finance model to consolidate baseline information and forecast projections. Without a properly verified and segmented housing backlog it is impossible to responsibly forecast the quantity and location of demand and for social facilities.. There is need for an urgent verification of baseline data. The SDF Implementation Framework recommends that the District undertakes an urgent verification and segmentation of the housing waiting list to enable proper infrastructure and facility planning. 	
71	The need for new landfill site is highlighted. Has this site not been planned? There is no mention of the processes in securing a new site?	Allan Rhodes (DEA&DP)	Yes	<ul style="list-style-type: none"> A new landfill site has been identified near MossGas, but it is not feasible for Oudtshoorn and Kannaland due to cost of transport. The infrastructure / growth management section of the report has noted this requirement. 	
72	A more proactive planning approach is required to manage the current sprawling low density settlements, which is driven by subsidy housing projects and private sector expansion, since these are often followed by infrastructure development once already in place.	Malcolm Fredericks Danie Swanepoel	No	<ul style="list-style-type: none"> This is dealt with extensively in the SDF and is the central motivation behind the Economy is the Environment and the Growth Management Strategies. The SDF notes that there is significant vacant and underutilised land within most towns within the municipality. The Implementation Framework highlights the need for all B Municipalities to develop or update their Densification Policies in line with the principles and strategies set out in the Eden SDF. Guideline 3.6.24: has been updated to include in statement “or be released to the market for economic activities, creating employment opportunities and diversity” 	
73	To address the shortages of land within municipal urban boundaries, it is critical that a comprehensive land audit be conducted, which includes unproductive agricultural land zoned agriculture for agriculture use, to establish how such land parcels can be incorporated into future land use planning to respond to the needs of other sectors	Malcolm Fredericks Danie Swanepoel (DEA&DP)			
74	It is still not clear from the spatial concept presented in the document how the issues of spatial injustice will be addressed, considering that most land is currently in private ownership compared to the few land parcels that are owned by local municipalities.	Malcolm Fredericks Danie Swanepoel	Yes		
75	Consideration should be given to shift new settlement to areas to where infrastructure is already in place.	Malcolm Fredericks Danie Swanepoel	Yes	<ul style="list-style-type: none"> This is one of the underlying principles of the SDF's Growth Management strategy which emphasises of the need to redirect growth to achieve inclusive and sustainable communities as the basis for addressing spatial injustice. This means building communities with access to facilities, services and economic opportunities. This in turn also means limiting development in areas where there are no economic opportunities and it is not feasible to sustain facilities and services. The SDF states that the building of sustainable communities is the basis for addressing spatial injustice. This means building communities with access to facilities, services and economic opportunities. This in turn also means not allowing development in areas where there are no economic opportunities and it is not feasible to sustain facilities and services. This has been clearly defined in the document. 	
76	I am not in support of consolidating growth away from municipalities under pressure. What do we do to attract growth towards these municipalities?	Hendrik Visser (Kannaland Municipality)			
77	An important historic settlement that should be included in the report is Van Wyksdorp and important water landscapes should include the Wilderness Lakes Ramsar Site.	Malcolm Fredericks Danie Swanepoel	Yes	<ul style="list-style-type: none"> The SDF has been updated to reflect these recommendations 	
78	Policy 1.7 deals with the management and maintenance of regional infrastructure. The SDF should include a recommendation that all sewer pump stations should be fitted with telemetry (where possible) to alert the relevant authority of risks / spills. It should also encourage the re-use of treated effluent for either irrigation of agricultural crops or use as potable water, rather than disposing of scarce resources (water).	Malcolm Fredericks Danie Swanepoel (DEA&DP)	Yes	<ul style="list-style-type: none"> The SDF has expanded on the principles of reduce and re-use is general infrastructure principle which is central to the growth management, economy and environment strategies directly address this. The SDF includes a general statement on water pollution and promotes the re-use of water to improve water use 	

				efficiencies as well as improving the quality of effluent.	
79	SANParks supports that waste water treatment capacity should not be exceeded. Current dysfunctional waste water treatment works should be upgraded and where possible moved away from sensitive ecosystems.	Maretha Alant (SANParks)		<ul style="list-style-type: none"> (See above) 	
80	Reference is made to smart urbanism. Do we want to introduce these Global North concepts to Eden? It is costly, different way of planning and thinking, and will cause pressure on the current settlements and spheres. If so, is the SDF the correct place for that, in absence of other sectoral plans being aligned to it?	Raynita Robinson (DHS)	No	<ul style="list-style-type: none"> Smart Urbanism is very much a Global approach and is founded on the acceptance that we have to do more with less and accepts that globally municipal and government resources are limited and declining and that we should be looking for low cost, effective, partnership based solutions wherever possible. Smart Urbanism provides tools, ideas and strategies from around the world (including many from the global south) and it is a sound, relevant and robust approach that could assist in South Africa with our challenges in the Built Environment. 	

4. Background & Legislation

No.	Comment	Who	Relevance to the SDF	Response and amendments to SDF where applicable	Agency/ Process Best Suited to deal with comment
81	Eden District receives 8,4% of the WC Provincial Budget. MSCOA (if properly implemented) can provide a tool to do “roll ups” of the capital budgets of the 7 B Municipalities and Eden District – so that the spending of National Treasury / Provincial Treasury / Relevant Government Departments in Eden District is defined. Comparisons with other Districts can then be made with the figures that DEA&DP is doing regarding National / Provincial spending in the Eden District.	Eduard Lotz (Eden District Municipality)	No	<ul style="list-style-type: none"> The project team proposed to conduct a financial baseline for Eden District. This was rejected by the client. 	
82	There is repetition in so far as the status quo information is concerned (there is a status quo synopsis presented in this draft SDF, which is in addition to the Status Quo chapter. In considering the layout of the final document, this duplication should be addressed.	Allan Rhodes (DEA&DP)	Yes	<ul style="list-style-type: none"> This repetition was intentional in order to provide context to the SDF, it has been synthesised in this document. 	
83	With regards to the district mandate, it may be worth referencing which sections of the Structures Act speak to this. Additionally, it is worth highlighting that the Structures Act, in terms of the sections relating to districts, was amended in 2000.	Allan Rhodes (DEA&DP)	No	<ul style="list-style-type: none"> This has already been included in the Status Quo document 	
84	Could it be helpful to identify municipal projects and budgets, and then identify cross-boundary project and budgeting considerations to be addressed / monitored / coordinated at a district scale?	Allan Rhodes (DEA&DP) Eduard Lotz (Eden District Municipality)	No Yes	<ul style="list-style-type: none"> The SDF does not map municipal budgets However, the SDF has identified a cross-boundary project programme for transport, waste and water. A section has been included in the implementation plan to “plan and budget as one government” 	
85	Realising that public investment capacity at a district scale is low, will the implementation chapter make suggestions for any capital investment or infrastructure projects, or consideration for how district-scale projects could be coordinated and funded?	Allan Rhodes (DEA&DP)	Yes	<ul style="list-style-type: none"> The SDF must plan for the District jurisdiction (including all spheres). The SDF proposals are strategic 	
86	It is unclear how information from the focus group sessions is coming through in the policies and guidelines. A golden thread approach would clearly show how key issues identified in the SQ have been pulled right through to implementation, showing how these will be addressed.	Allan Rhodes (DEA&DP)	No	<ul style="list-style-type: none"> The focus group sessions were too wide and were driven by a broader agenda (RSIF and SCEDP). The spatial issues that relate to the SDF have been synthesised and brought through the document. 	
87	Show in diagram form how all the components of the focus groups, visioning sessions, and information collection fit into the bigger picture of the SDF development process in terms of how information is collected and filtered.	Allan Rhodes (DEA&DP)	No		
88	In terms of the policy and legislation section, there is arguably not enough detail with regards to the new planning legislation, and its implications specifically for district planning. How does district planning differ from regional etc?	Allan Rhodes (DEA&DP)	No	<ul style="list-style-type: none"> Regional planning and district planning do not differ 	
89	There are arguably vital and key pieces of legislation and policy that are missing and could be included e.g. Global Sustainable Development Goals?	Allan Rhodes (DEA&DP)	No	<ul style="list-style-type: none"> This was explicitly avoided to avoid repetition. It is also not possible to include every policy that may relate to the SDF as the SDF would be an extremely lengthy document 	
90	With regards to the strategic goals from the 2012-2017 IDP for the EDM, with the newly created 4th generation IDP (2017-2022) in draft format, have any of these strategic goals changed under any new administration?	Allan Rhodes (DEA&DP)	No	<ul style="list-style-type: none"> See section on the IDP and SDF 	
91	The first draft of the Eden SDF Status Quo Report, a Status Quo Synthesis was included in Chapter 3. Although this synthesis seems to be missing from the second draft report, it is recommended that this section be included again as it provides a strong synthesis of cross-cutting issues, opportunities and tensions, and the “6 Big Issues” as an executive-summary type synthesis of the status quo of the region.	Allan Rhodes (DEA&DP)	Yes	<ul style="list-style-type: none"> This section has been included in the final draft of the report 	

4. Background & Legislation

No.	Comment	Who	Relevance to the SDF	Response	Agency/ Process Best Suited to deal with comment
92	A spatial vision and spatial mission be set out which explains how the vision and mission 'plays out spatially'	Allan Rhodes (DEA&DP)	No	<ul style="list-style-type: none"> The document has already illustrated how the SDF plays out spatially 	
93	Clarity be provided with regards to what are the IDP projects and what (new) additional projects have been identified in the new SDF	Allan Rhodes (DEA&DP)	No	<ul style="list-style-type: none"> The district SDF does not map IDP projects 	
94	It is recommended that the implementation tables go beyond the identification of role- players, and provide guidance on what institutional structures will be helpful to bring these role players together e.g. Forums etc.	Allan Rhodes (DEA&DP)	No	<ul style="list-style-type: none"> The SDF is not an institutional plan, this will also date the SDF. 	
95	Consider including a section of recommendations for each local municipality, making a case for leveraging funds for district wide services, infrastructure, and shared services.	Allan Rhodes (DEA&DP)	No	<ul style="list-style-type: none"> Refer to point related to the Fiscal Impact tool 	
96	It may be helpful to have a section whereby the abutting SDFs are stitched together to show both vertical and horizontal alignment?	Allan Rhodes (DEA&DP)	Yes	<ul style="list-style-type: none"> This has been reflected in the final SDF 	
97	The relevance of an assessment of SDFs (some of which were drawn up before the implementation of the new planning legislation), in terms of the development principles of SPLUMA and legal content and process requirements, is questioned.	Allan Rhodes (DEA&DP)	Yes	<ul style="list-style-type: none"> It was necessary to review the existing SDFs in order to understand their objectives. The final SDF will omit this section 	
98	The abutting SDFs (both local and district) be touched on, shown, and explained. This could take the form of a table.	Allan Rhodes (DEA&DP)	Yes	<ul style="list-style-type: none"> This has been reflected in the final SDF 	
99	Could the opportunities and risks be comprehensively shown on a single map?	Allan Rhodes	No		
100	A section could be included which deals with the integration of all sector plans relevant to the district.	Allan Rhodes (DEA&DP)	No	<ul style="list-style-type: none"> This is discussed in the Status Quo Baseline Report and under the section "Plan and budget as one government" 	
101	In many focus groups a need for a local place of higher learning was identified. I suggest that, for lack of a section dealing specifically with education, which we should be proposing that a Garden Route University - Centre of Excellence for Marine, Biodiversity and Afro-Montane studies be built in the area. It would be a collaborative institution founded by the several South African universities, and other institutions such as SANBI, SANParks and others, along with overseas Universities – physically and in virtual form. The nascent BioWise Institute in Knysna would be included in this University campus too. Whilst other needed disciplines would not be neglected, the initial thrust would be on the unique differentiating factors of the Garden Route. A land owner has offered their ocean facing land for this purpose.	Errol Finkelstein (Garden Route Biosphere Reserve)	Yes	<ul style="list-style-type: none"> Considering the economic growth potential of Mossel Bay and George, there may be merit in strengthening and expanding the NMMU campus in George The SDF has highlighted the opportunity to expand NMMU in George 	

4. Background & Legislation

No.	Comment	Who	Relevance to the SDF	Response	Agency/ Process Best Suited to deal with comment
102	The Eden SDF needs to make clear statements on which specific relevant taxes / levies / duties could / should be charged (especially given Eden DM's dire need for additional revenue), so that this can form a foundation where the CFO of Eden DM can investigate such options.	Eduard Lotz (Eden District Municipality)	No	<ul style="list-style-type: none"> The SDF proposes the formulation of a Capital Investment Framework. Issues relating to income and expenditure should be addressed in this exercise. It is not within the scope of an SDF to deal with revenue generation. 	
103	The Capital Expenditure Framework is key – engage with the CFO of Eden DM (Ms Louise Hoek) and her team at Eden DM's Department Financial Services to clarify their "Medium Term strategy" in this regard – especially in terms of projected Budget Deficits to implement the Spatial Development proposals contained in the Eden SDF	Eduard Lotz (Eden District Municipality)			
104	Key "Cross Boundary" issues / opportunities need to be clearly listed – between B Municipalities in Eden District, but also between Eden DM and Central Karoo DM in the north, Sarah Baartman District (EC) in the East and Overberg / Cape Winelands in the West to ensure proper alignment with their respective SDFs.	Eduard Lotz (Eden District Municipality)		<ul style="list-style-type: none"> This has been included in the SDF 	
105	It is recommended that cost-efficient intergovernmental mechanisms of land acquisition / transfer between provincial government and the relevant municipalities be considered as a component of the implementation framework. Consideration should also be given to the implementation sequence of the WCED's budget as set out by the Infrastructure Delivery Management (IDMS), to ensure the adequate provision of school sites are timeously available to develop the new WCED school projects.	Melodie Campbell (DoE)		<ul style="list-style-type: none"> This has been included in the implementation framework 	
106	Can the WC DEA&DP Draft Rural Land Use and Management Guidelines 2014 be attached as an annexure to the Eden SDF, seeing as the SDF adopts and recommends the application of it, in order to be able to refer to the maps of the "Spatial Planning Categories" as indicated on page 140 of chapter five. The same counts for the "PSDF Heritage and Scenic Resources Specialist study 2013". I had a brief look at the WC PSDF 2014 and online, but couldn't find the actual studies.	Marcel Minnie (Bitou Municipality)	No	<ul style="list-style-type: none"> These will be made available online 	