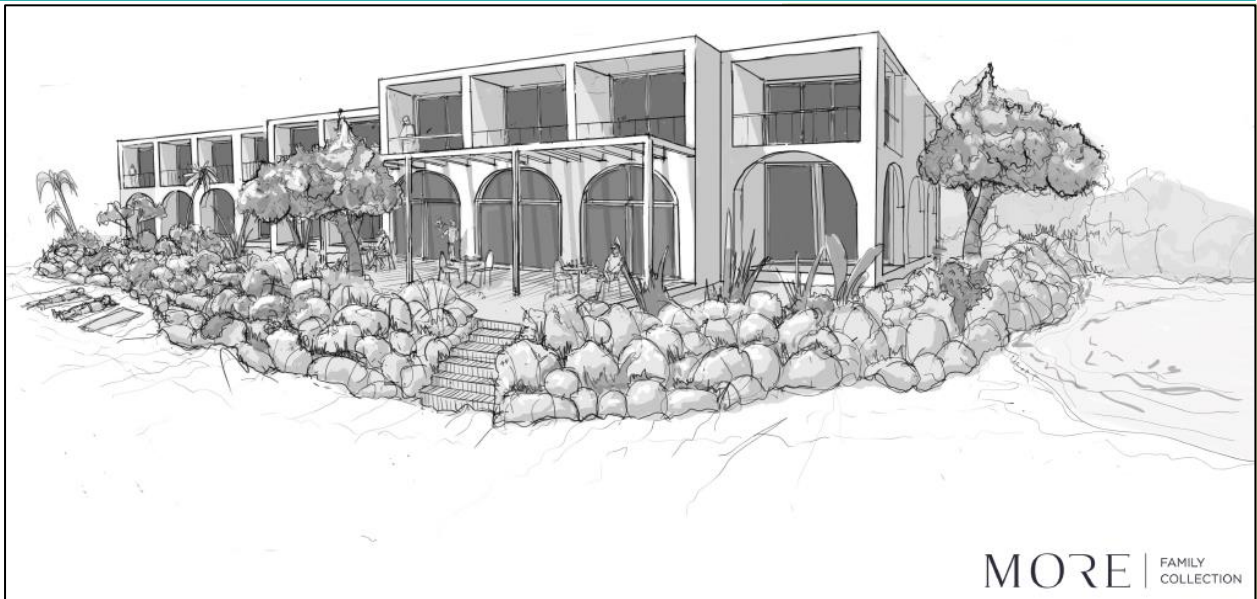


**ERF 10190  
PLETTENBERG BAY  
MILKWOOD MANOR**

**Departure and SDP Approval Applications**



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# 1. INTRODUCTION

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We act on behalf of the **MORE Family Collection** ([www.more.co.za](http://www.more.co.za)) which is in the process of acquiring the Milkwood Manor from the **Groenendijk Trust** (see Power of Attorney and Company Resolution attached as Annexure A).

The Milkwood Manor is situated on Erf 10190 and is zoned “General Residential III” and has been operating as a Boutique Hotel and Restaurant since 1997. The proposal is to upgrade and extend the existing hotel.

To facilitate the planned extensions, this application seeks to request the following planning approvals in terms of the Bitou Municipality: Land Use Planning By-Law:

- i. Section 15 (2) (b): Departure for the provision of on-site parking (38 bays to 5 bays) in lieu of the upgrade and extension of the public parking area (adding 27 NEW public parking bays, a public bus drop-off parking bay, a public beach-shower facility and public ablution block) situated on the adjacent Erf 2066 and 706, as agreed by Council (See Council Resolution C/6/142/06/24 attached hereto as Annexure D).
- ii. Section 15(2) (b): Departure from the western lateral building line from 2m to 0m to permit the extension of the existing building as indicated on Site Plan Nr. 073\_SDP\_A - 02 attached as Diagram 8.
- iii. Section 15(2) (b): Departure from the southern street boundary from 4m to 0m to allow an enclosed refuse yard and generator room as indicated on Site Plan Nr. 073\_SDP\_A - 02 attached as Diagram 8.
- iv. Section 15 (2) (g): Permission in terms of a Zoning Scheme for the approval of the proposed Site Development Plan attached as Diagram 8.

## 2. PROPERTY INFORMATION

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### 2.1 LOCALITY

- The Milkwood Manor has a unique location, situated adjacent to both the Lookout Beach and the Keurboom Estuary, two of the most celebrated tourist attractions in Plettenberg Bay.

- The Hotel can be accessed from Beacon Way via Salmack Road which culminates in a public parking area in front of the Hotel. The parking area provides public access to Lookout Beach (see Locality Plan attached as Diagram 1 and Figure 1 below).

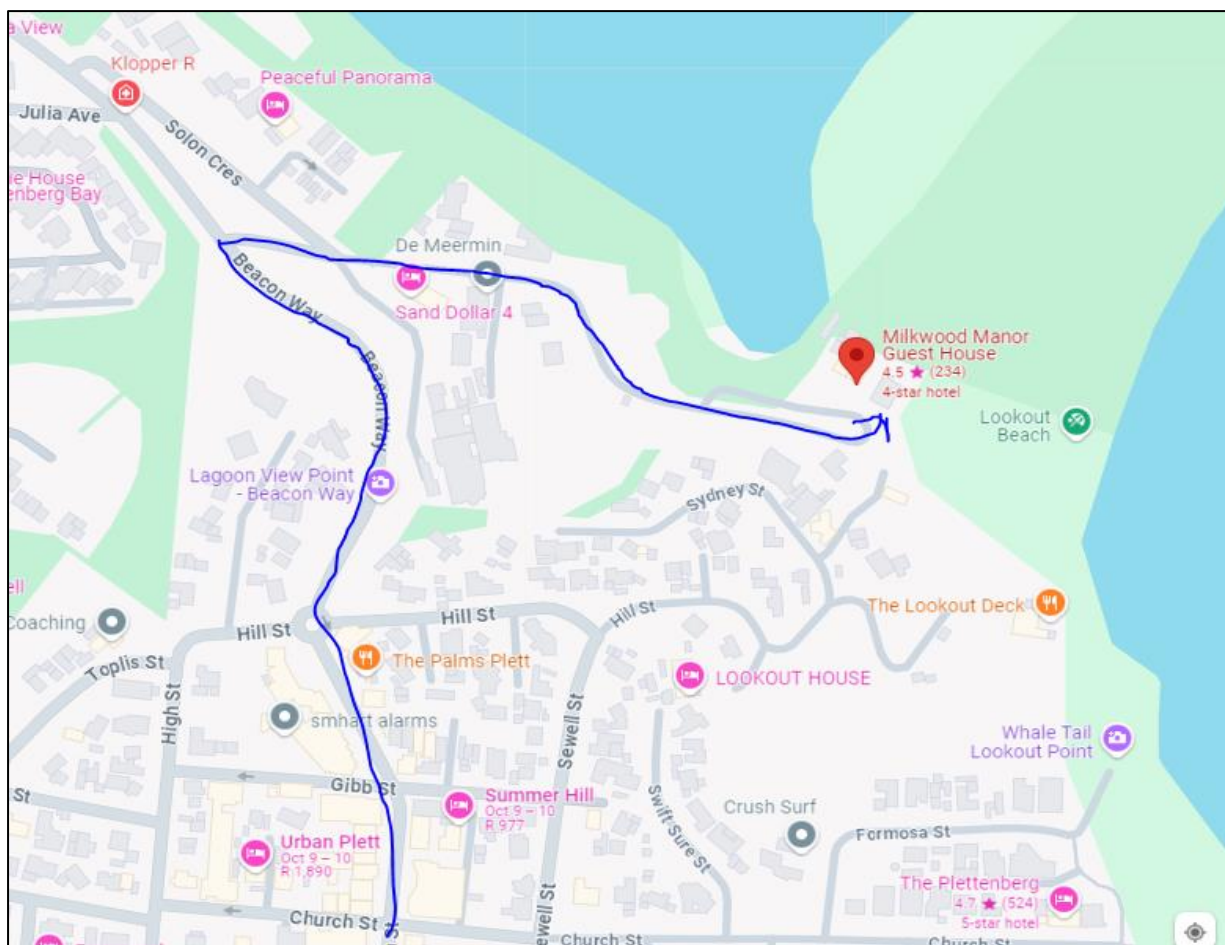


Figure 1: Locality of the site.

## 2.2 PROPERTY DETAIL

Title Deed Description	ERF 10190 PLETTENBERG BAY
Title Deed Number	T 042131/2009
Title Deed Restrictions	None
Property Size	2852m <sup>2</sup>
Property Owner	Groenendijk Trust
Bonds	None
Servitudes	None
Land Use	Hotel and Restaurant
Zoning	General Residential III

### 3. BACKGROUND

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- The property was originally set out in 1952 as a small hexagonal “Minor Business” property, known as Erf 692.
- The Title Deed described the originally intended activities on the site as a “tearoom and shop”. These conditions were removed in 1994. Before that, the property operated as a restaurant.
- In 1995 the property was rezoned from “Minor Business” to General Residential to permit a Guest House.
- In 1989, the Council agreed to sell a portion of municipal land 164m<sup>2</sup> in size (Erf 8697) to the owners of Erf 692 and to also lease an area of 1858m<sup>2</sup> to them.
- Erven 692 and 8697 were consolidated to create Erf 8698 in 2000.
- In 2005, the Council agreed to sell the area previously leased to the owners of Erf 8698.
- Erf 10190 was created in 2008 after the sale of the adjacent land was concluded.
- Before the land was transferred, the 2007 storm surge occurred and more than 64% of the property bought from Council was submerged under water.
- A rock revetment was constructed in 2009 to protect the rest of the property and the adjacent public parking area.
- In 2011, an S24G authorisation was granted by the Department of Environmental Affairs and Development Planning for the construction of the revetment.
- In 2011, the same department also issued an Environmental Authorisation for the construction of a deck and boma.
- In 2008, and again in 2013, the previous owners applied to purchase or lease more land from the Council to accommodate parking as well as minor encroachments to make up for the loss of land that occurred due to the new highwater mark. There is no available correspondence on file to confirm if the lease agreements requested were ever concluded.
- There is however a section of the adjacent parking area, measuring about 225m<sup>2</sup> that has historically been used by the current owner of the land for private parking purposes of the Hotel. This area has formed part of the proposed lease area.



- Approved Building Plans from 2011 (attached as Diagram 7) indicate a lease area with 6 parking bays.



Figure 2: The Milkwood Manor.

## 4. PROPOSAL

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### 4.1 THE CONCEPT

- The MORE Family Collection ([www.more.co.za](http://www.more.co.za)) owns and operates luxury lodges, boutique hotels, and private residences in Southern Africa's best leisure destinations and combines these destinations to offer high-end Southern African experiences to discerning international guests. They have recently expanded their footprint to include Plettenberg Bay as one of the most sought-after beach destinations in Southern Africa.
- The MORE Family Collection recently was recognised in the prestigious international Travel+Leisure World's Best 2024 Top as the No. 1 and No. 7 Safari Lodge in Africa.
- The Milkwood Manor has been operating as a Boutique Hotel and Restaurant since 1997. Presently, the hotel comprises 14 (*1 room is the residence of the current owner*) rooms and the Lemon Grass restaurant with  $\pm 100$  seats is open to the public.



- The proposal is to upgrade and extend the existing hotel by adding 10 rooms, totalling 24 bedrooms. Additions and alterations are proposed to all four elevations of the existing building. The ground floor building footprint will be extended by  $\pm 550\text{m}^2$  and the first floor by  $\pm 556\text{m}^2$ . The total new development footprint is calculated to be  $\pm 1,106\text{m}^2$ , bringing the total floor area of the new hotel to  $\pm 2,071\text{m}^2$ .
- The extension is needed to accommodate the volume required for the type and level of hospitality service that will be provided. Most industry experts recommend that a luxury 5\* boutique hotel should have at least 20 to 30 rooms to ensure financial viability, especially when accounting for the need for a luxury-experienced who requires a full-time leadership structure which would include a General Manager, Deputy General Manager, Executive Housekeeper, Food and Beverage Manager and Executive Chef and other fixed staffing costs. This range provides a cushion for operational stability, and profitability, and allows for economies of scale without diluting the personalised service that defines a boutique hotel.
- It is the intention to reduce the size of the restaurant to about +-60 seats (currently +-100 seats) which will mostly cater to the needs of resident guests but will not exclude the public.

## **4.2 PARKING PROVISION**

### **4.2.1 DEPARTURE FROM THE PROVISION OF THE ZONING SCHEME**

- The Zoning Scheme requires a parking ratio of 1.25 bays per room which will calculate to 30 parking bays for 24 rooms, excluding other facilities, (specific ratios apply to each use). The Zoning Scheme does not provide specific parking requirements for a restaurant. In such a case, the By-law stipulates that the Municipality must determine on-site parking requirements for land uses not stipulated. It is proposed that the Business ratio of 4 per 100m<sup>2</sup> be used. The restaurant section measures 197m<sup>2</sup> and will require 8 additional bays. The total parking requirement calculates to 38 bays. The present proposal only provides for 5 on-site bays, which leaves a shortfall of 33 bays.
- As part of this extension, the new owners seek to reduce on-site parking requirements as stipulated in the Bitou Zoning Scheme, by utilising the adjacent public parking area and upgrading it to include 27 additional public parking bays as well as a bus drop-off parking bay (which could account for at least 6 individual bays). The proposed upgrade also includes the resurfacing of the entire parking area, landscaping, upgraded lighting, and the provision of public ablution and beach-shower facility.

- Chapter 8 of the Bitou Municipality Zoning Scheme By-Law deals with parking and access requirements. Section 38 (8) stipulates that on-site parking space can be provided in public parking facilities available in the vicinity subject to the Municipality's approval. The parking area currently provides 55 bays (see Surveyed Contour and Site plan attached as Diagram 5) but can be extended to accommodate  $\pm 82$  bays as well as a bus bay which will sufficiently address the requirements of the Bitou Zoning Scheme. The proposed parking layout is indicated in the attached Site Development Plan (Diagram 8).

#### **4.2.2 COUNCIL APPROVAL OF THE USE OF THE PUBLIC PARKING AREA**

- The proposed extension of the public parking is proposed within the boundaries of the Remainder of Erf 2066 which is zoned for "Transport Zone II" and allows for a "public road/street" and includes open public parking areas and Erf 706 that is earmarked for Public Open Space ("Open Space II"), which also permit public facilities such as parking areas.
- The properties are respectively indicated as "Public Road" and "Public Open Space" on the General Plan and therefore vest in the Bitou Municipality in terms of Section 25 (1) of the Bitou Municipality Land Use Planning By-Law.
- Before this application, the Council was approached to request their acceptance of the concept of upgrading and extending the existing parking area. In a special Council meeting held on 27 June 2024, the Council resolved to support the proposal, subject to certain conditions (See Annexure D), which include among other things, the submission of a parking departure application.
- The SDP that served in front of the Council only indicated 24 additional parking bays and omitted the northern extension of the parking area onto Erf 706 as at the time there was uncertainty about the position of the high watermark and subsequently ownership of the land. Since then, the highwater mark was surveyed and the Surveyor General confirmed that the land belongs to the municipality and that it is within their right to use it for parking purposes (See Annexure N). As can be seen from the figure below, a portion of the existing parking is already on Erf 706.



Figure 3: Position of parking area extension.

#### 4.2.3 DETAIL DESIGN CONSIDERATIONS

- **Parking Layout:** The existing parking area has enough space to accommodate more parking, as indicated on the attached SDP. This space is partly created by removing the existing encroaching structures of the existing hotel. A slight extension of the parking footprint along the northern and western boundary of the existing parking area allows for a perpendicular parking layout as opposed to the current diagonal layout, which permits a more functional and economic layout. Through efficient layout, the number of bays can be increased without encroaching onto sensitive areas or impeding traffic flow. The proposed layout complies with Standard South African Parking Guidelines.
- **Lighting:** The proposal includes the installation of adequate lighting throughout the parking area to enhance safety and security, especially during evening and nighttime hours, and also be considerate of electricity usage and light pollution. Currently, there are no streetlights.
- **Re-Surfacing:** Presently, the parking area is partially surfaced with paving stones, gravel, and tar that has not been properly maintained. The appearance of the parking area is not welcoming. It is planned to resurface the entire parking area, which will include green infrastructure elements such as

permeable paving and bioswales to manage stormwater runoff. As per the conditions of the Council resolution, the resurfacing will be in accordance with the specifications and requirements of the Engineering Department's: Roads Section, and all costs will be for the account applicant.



**Figure 4: Existing Surface.**

- **Landscaping:** Landscaping will enhance the aesthetic appeal of the parking area and include the use of Indigenous and drought-resistant plants to minimise water usage and maintenance. Several Milkwood trees are present and have been surveyed to inform the design. None will be removed, as recommended in the Biodiversity Study.



**Figure 5: New proposed indigenous and water-wise landscaping.**

- **Signage:** Directional and functional signage will also be added to the parking area making it easier for visitors to know where the ablutions are, the Hotel, and the Lookout Beach and to create a sense of arrival. The parking bays including a bus drop-off area will be demarcated.
- **Transport options:** A tour bus drop-off parking bay has been provided on the upgraded parking plan.
- **Public Ablution facilities:** This popular access point to Lookout Beach has no public amenities such as toilets and showers. Part of the proposal is to provide these facilities for the public's benefit. The ablution facility was initially proposed at the existing entrance to the beach, but the ocean engineers recommended that the building and infrastructure associated with it should be moved away from the seaside boundary. A new position adjacent to the existing municipal pump station on the parking lot is proposed. The beach showers are still positioned and the entrance to the beach only consists of a wooden deck.



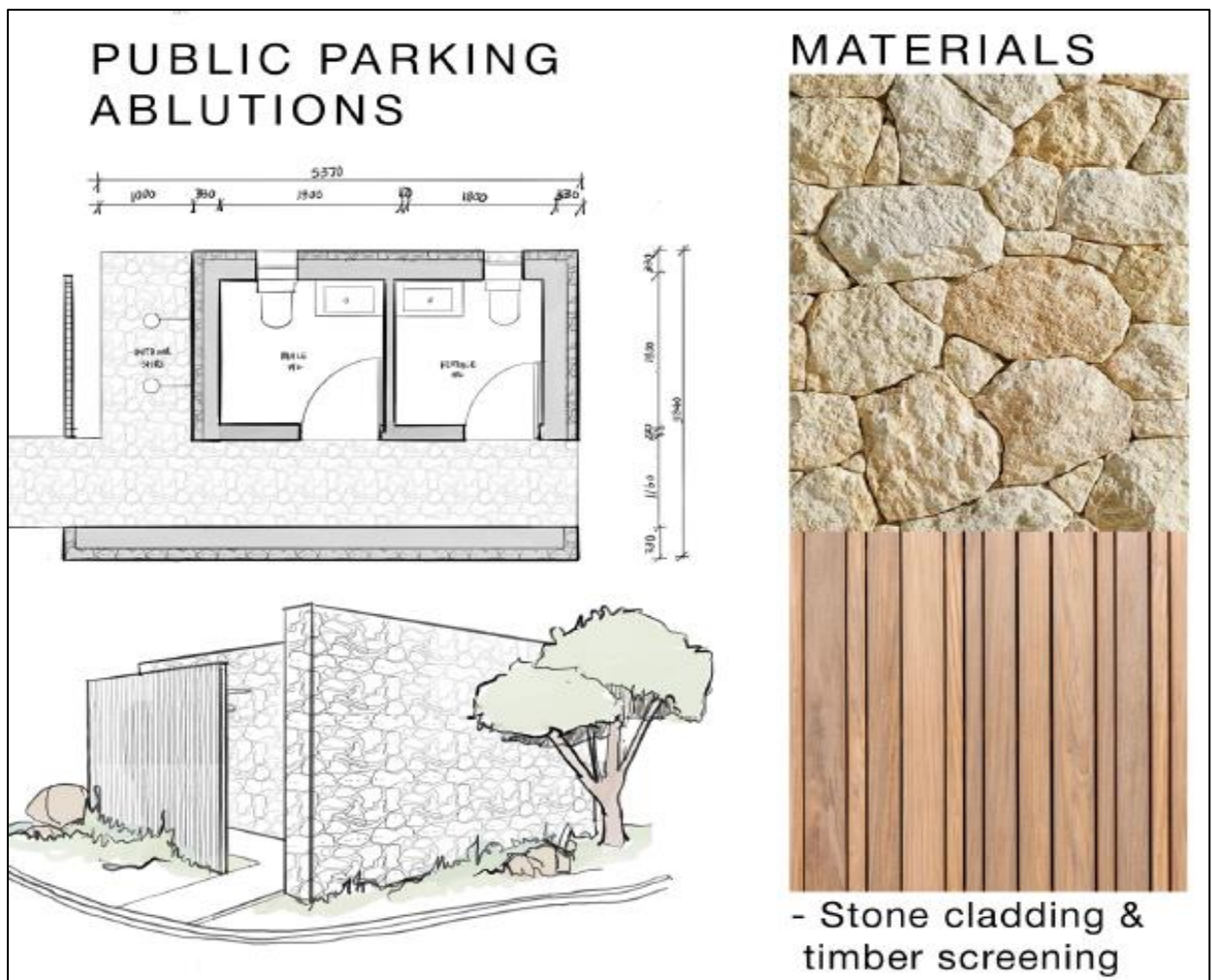


Figure 6: Public Ablution.

### 4.3 BUILDING LINE RELAXATION

- After the rock revetment was constructed around the property, most of the useable open space around the hotel, including the swimming pool was lost. The owners constructed a seating area in the form of a timber deck to the west of the existing building, up to the rock revetment. An environmental authorisation was issued by the Department of Environmental Affairs and Development Planning in 2011 (See Diagram 6 of the approved ROD SDP). As can be seen from the surveyed Site Plan, attached as Diagram 5, the deck, however, encroaches over the boundary line of the property into Erf 706 which belongs to the municipality.
- The renovations will include the removal of this encroachment into public land. It is however the intention to extend the building up to the boundary of the property. The 2m boundary line is currently occupied by the outdoor seating area and garden.
- Application is also made to relax the southern boundary building line of 4 meters to 0m. The intention is to create an enclosed service area to contain service infrastructure such as water tanks, refuse storage, a generator room, and a delivery area (that is presently located in the municipal parking area).

This will improve the functionality of the hotel but will also neaten up the parking area and will also free up space for a more functional parking layout. Due to the position of the existing building and surrounding revetment, there is no other place to put these facilities.

- The Zoning Scheme permits structures such as water storage tanks, geysers, gas installations for heating or cooking, renewable energy structures for household purposes, wendy houses/ garden sheds, and washing lines, none of which exceed the height of the boundary wall unless suitably screened off to the satisfaction of the Municipality, up to a maximum of 2.1m above the natural ground level. The generator room and battery room will be covered by a concrete slab, it is possible these structures, especially the generator room and battery room may be higher than 2.1m, bearing in mind that the floor levels may have to be raised. To be on the precautionary side, building line relaxation is requested to accommodate these structures as indicated in Figure 7 below.

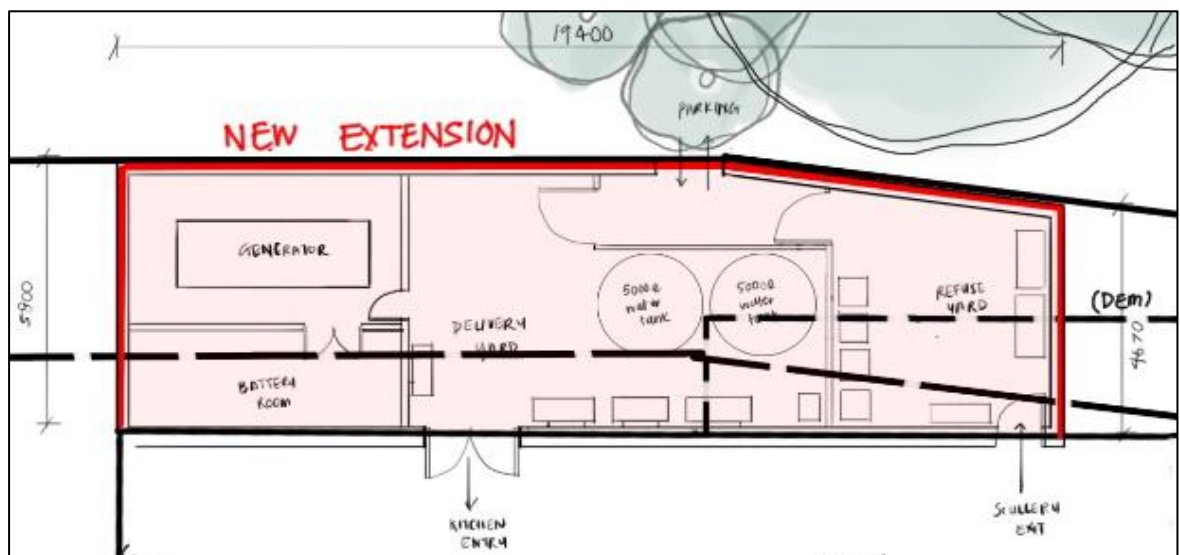


Figure 7: Proposed Service Yard.

#### 4.4 SITE DEVELOPMENT PLAN APPROVAL

- Erf 10190 is zoned General Residential III in terms of the Bitou Integrated Zoning Scheme.
- The objective of this zone is to provide a temporary residence for transient guests in an appropriately scaled establishment that may include a small conference/ training facility that also caters for business meetings and where lodging and meals are provided.
- **“Tourist Accommodation”** is the primary use in this zone and is described as an establishment that provides temporary residence and meals for transient guests, and inter alia –
  - (a) includes—
    - (i) **guest lodges**, boutique hotels and self-catering units;
    - (ii) **restaurants**, conference and entertainment facilities and a chapel that are



- subservient and ancillary to the dominant use;
  - (iii) premises that are licensed to sell alcoholic beverages for consumption on the property;
  - (iv) flats;
  - (v) a wellness centre; and
  - (vi) a boarding house; but
  - (b) does not include—
    - (i) a liquor store;
    - (ii) a backpackers' lodge;
    - (iii) place of entertainment.
- One of the development parameters for “Tourist Accommodation” as stipulated in the Bitou Zoning Scheme, requires that a Site Development Plan shall be submitted to the Municipality for approval, which may impose such conditions as it deems fit; provided that the Site Development Plan shall be approved prior to the approval of building plans and/or the use being exercised. The purpose of this application is to obtain the approval of the Site Development Plan for the development.
  - The proposal illustrated in the Site Development Plan fits in with the description of tourist accommodation and complies with development parameters set out in the Zoning Scheme, except for building lines and parking requirements already mentioned.
  - The SDP is currently being assessed from an environmental perspective and the final SDP will be submitted once the Environmental Authorisation has been obtained from the Department of Environmental Affairs and Development Planning Major amendments are not expected as all the commissioned specialist reports have supported the SDP Proposal in its current form.

DEVELOPMENT PARAMETERS FOR TOURIST ACCOMMODATION		
(a) Coverage	The maximum coverage is 60%.	38.6%
(b) Floor factor	The floor factor may not exceed 1	0.73
(c) Height	(i) The highest point of a building may not exceed 8,5 metres from natural ground level. (ii) The general provisions regarding earth banks and retaining structures in this By-Law apply.	8.5m
(d) Building lines	(i) The street building line is at least 4 metres.	Departures required.

	<p>(ii) Side and rear building lines are at least 2 metres.</p> <p>(iii) The general building line encroachments in this By-Law apply.</p>	
(e) Parking and access	<p>Parking and access must be provided in accordance with this By-law.</p> <p>Tourist Accommodation: 1.25 bays/bedroom</p>	Departure required.
(f) Screening	The Municipality may require screening in accordance with this By-law.	Screening of service yard with a wall.
(g) Site Development Plan	A Site Development Plan shall be submitted to the Municipality for approval, which may impose such conditions as it deems fit; provided that the site development plan shall be approved prior to the approval of building plans and/or the use being exercised.	Part of this application.
(h) Open space	An outdoor living area/s of at least 10% of the total erf area must be provided, which must be of reasonable proportions and location to allow for leisure or recreational use by guests and lodgers and may include open courtyards within the complex.	The proposal allows for private balconies, a courtyard as well as an open seating area, and swimming pool landscaped gardens, etc. The requirements are calculated to be about $\pm 285\text{m}^2$ . The final Building Plans will indicate that the development will comply with this requirement.
(i) Service yard	A service yard must be provided on the land unit by this By-law.	Proposed within the street building lines.
(j) Refuse room	A refuse room must be provided on the land unit in accordance with this By-law.	Proposed within the service yard.
(k) Outdoor advertising and signage	May only be displayed in accordance with the Municipality's Outdoor Advertising and Signage By-law.	Signage plans will be submitted at Building Plan stage.

## **4.5 SERVICES**

### **4.5.1 ELECTRICITY**

- GLS Consulting Engineers has been appointed to investigate and comment on the bulk electricity services for the proposed redevelopment project on Erf 10190. The report is attached as Annexure F. The Report concludes that the existing electrical network currently has enough capacity to carry the additional 48 kVA maximum demand calculated for the proposed redevelopment on Erf 10190.
- It is also the intention to install a small-scale embedded generation (SSEG) at the development as a backup measure to ensure continuous electrical supply. The SSEG system will be registered with the municipality.
- The developer of Erf 10190 in Plettenberg Bay will be liable for the payment of a Development Contribution (as calculated by Bitou Local Municipality) for additional bulk electricity infrastructure required for the hotel, as per Council Policy.

### **4.5.2 WATER**

- GLS Consulting Engineers has been appointed to investigate and comment on the bulk water supply for the proposed redevelopment project on Erf 10190. The report is attached as Annexure G. The report concludes that the existing water network has sufficient capacity to accommodate the additional water demand of the proposed extension of the hotel, however, the current network has insufficient capacity to supply fire flow to Erf 10190 of more than 15 L/s and certain upgrades are required, which will be for the cost of the developer.
- The developer of Erf 10190 in Plettenberg Bay will be liable for the payment of a Development Contribution (as calculated by Bitou Municipality) for additional bulk water required for the extension hotel, as per Council Policy.

### **4.5.3 SEWER**

- GLS Consulting Engineers has been appointed to investigate and comment on the bulk sewer availability for the proposed re-development project on Erf 10190. The report is attached as Annexure G. The report concludes that there is sufficient capacity in the existing sewer system to accommodate the proposed extension of the hotel.

- The developer of Erf 10190 in Plettenberg Bay will be liable for the payment of a Development Contribution (as calculated by Bitou Municipality) for additional bulk sewer required for the extension of the hotel as per Council Policy.

#### **4.5.4 SOLID WASTE**

- Solid waste will be collected by the municipality as part of their municipal collection routing. The Site Plan indicates an enclosed refuse yard from where the waste can be collected. In addition to this, there will be a separation of recycled materials on-site for collection by a community-based collection service. Recycled waste is recorded and kept as part of the company's internal sustainability records.

#### **4.5.5 STORMWATER**

- From the Engineering Report, it appears that there is no stormwater network available in the area.
- The Aquatic Assessment Report recommended that a detailed Stormwater Management Plan be prepared that will adequately address and mitigate stormwater flows from the car park. A detailed Stormwater Management Plan will be prepared and submitted with the Basic Assessment Report.
- The Aquatic Specialist recommended that the stormwater design should include multiple stormwater outlets into the design to spread flows out across a wider area and prevent concentrated, high-energy stormwater flow from fewer outlets and that erosion protection in the form of stilling basins or reno mattresses must be placed at the outlets.

## **5. MOTIVATION**

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### **5.1 JUSTIFICATION FOR REDUCED ON-SITE PARKING**

#### **5.1.1 REALIGNMENT OF THE HIGH WATERMARK**

- During the 2007 floods, the course of the Keurboom estuary moved and submerged a section of the property as well as sections of the parking area. To secure the property and the adjacent parking area from future storm surges, a rock embankment was constructed around the property, with the approval of the Department of Environmental Affairs and Development Planning. A large section of the property now falls seaward of the revetment and is unusable for building or parking purposes.

- The shortfall of parking is due to the fact that approximately a third of the property cannot be used. If the entire property could be utilised, the site could probably provide for the bays required.
- By reducing on-site parking requirements, the need for additional construction in ecologically sensitive areas is removed, preserving the natural landscape and coastal movement.

#### **5.1.2 ALTERNATIVES CONSIDERED**

- Basement parking was considered as an alternative but proven to be very expensive, due to the low water table and excessive excavation also posed environmental concerns.
- Another alternative on the table was to add a third storey to the existing building to allow more space for parking, but this would have resulted in the encroachment of the 8.5m height relaxation which would impact negatively the surrounding properties.

#### **5.1.3 HISTORICAL USE OF THE PUBLIC PARKING AREA**

- Presently the hotel has 13 saleable rooms and a public restaurant that can seat approximately 100 guests. There are only about 10 on-site parking bays of which at least 4 encroach onto council land.
- Approved Building plans from 2011 (See Diagram 7) indicate 12 onsite parking bays and 6 parking bays on a "lease area".
- There are also other encroachments like carports, wooden fences, and a generator room that has historically encroached onto council land. The new owner will remove all these illegal structures, which will make room for a more functional parking layout, that will benefit the Council, the public, and the hotel itself.
- The restaurant section has always made use of the public parking area and has not been required to provide onsite parking.
- The new proposal will have more rooms, but the restaurant area will be substantially smaller with a maximum of 60 seats, mostly catering to hotel guests, but will not exclude the public.

#### **5.1.4 PARKING REQUIREMENT OF THE NEW HOTEL**

- The MORE Family Collection creates bespoke luxury travel experiences for its clients. These guests are not self-drive tourists, and their travel packages normally include several destinations and transport. As part of the hospitality service, the company has a private shuttle service that picks up guests at airports and also provides transport to local attractions. Staff is also transported by

company vehicles. It is submitted that the 5 on-site bays provided, are sufficient for the operational requirements of the hotel.

- This transport arrangement also aligns with the town's vision for sustainable mobility and reduces traffic congestion in the town.
- Although the proposal will have more rooms, the actual parking requirement will be less. The restaurant area will also be substantially smaller with a maximum of 60 seats (*40% less than the current size*), mostly catering for hotel guests.

#### **5.1.5 NEARBY PUBLIC PARKING FACILITY**

- Section 38 (8) b of the Bitou Zoning Scheme makes provision for the possibility of providing parking at a nearby public parking facility, with Municipal approval. The site is situated adjacent to a large parking lot which has historically provided public access to the beach and has also been used by the patrons of the Lemon Grass restaurant for many years.
- Presently there are 55 bays available. There is an opportunity to upgrade the parking area and to add another 27 parking bays as well as a bus drop-off parking bay to the site without extending into protected vegetation or sensitive dunes. It would not be the intention to use these additional bays exclusively for the hotel and the bays would be available for public use.
- The proposal to use and upgrade the parking area was presented to the Council (the landowner) and the proposal was approved subject to certain conditions.

#### **5.1.6 IMPROVED VISITOR AMENITIES**

- The addition of public ablution and beach shower facilities addresses a crucial need in the area, enhancing the comfort and convenience of visitors to Lookout Beach. This upgrade elevates the overall attractiveness of the destination and encourages longer stays, benefiting both tourists and local businesses.

### **5.2 JUSTIFICATION FOR BUILDING LINE RELAXATION**

#### **5.2.1 LIMITED DEVELOPMENT SPACE**

- As explained in par 5.1.1 above, a large section along the northern and eastern sides of the property falls seaward of the revetment and is unusable for building or parking purposes. To accommodate potential sea surges, the Coastal Engineer has further advised (See Annexure I) that the new building

extension should be set back from the eastern lateral boundary by at least 9.45m. This resulted in further loss of development land.

## **5.2.2 EXISTING DEVELOPMENT FOOTPRINT**

- Application is made for the relaxation of the western lateral building line from 2m to 0m, to accommodate an extension of the existing building to the east. The land is currently occupied by manicured gardens, decks, and structures, there will not be any removal of indigenous vegetation required.
- Presently a portion of the existing building also encroached over the street building line but will be demolished.

## **5.2.3 REMOVAL OF ENCROACHING STRUCTURES OVER ERF 706**

- Along this eastern lateral boundary is an existing deck that encroaches over the boundary line up to the rock revetment. The construction of this deck obtained Environmental Authorisation in 2011. At the time open decks were permitted within building lines and specific relaxation for the building line was not required from the local Council.
- The deck will now be removed and there will not be any encroachment onto Council land. Although the new development will encroach over the western building line, the overall footprint along this boundary will be reduced by removing the encroaching deck.

## **5.2.4 REMOVAL OF ENCROACHING STRUCTURES OVER ER 2099**

- The service yard is proposed along the southern street boundary, adjacent to the parking lot. This is the most functional position as it is easy to access for delivery vehicles, rubbish collection, etc. The yard will be enclosed by a wall and partially with a concrete roof. The service yard will be consolidating unsightly but necessary structures that support the functionality of the hotel e.g. rainwater tanks noise proof generator room, battery rooms, garbage storage, delivery yard, etc.
- Some of the structures, that currently support the hotel operation encroached onto Council land in the form of ad hoc temporary structures without the required permissions these include the generator room as well as storage containers. These structures will now be removed from council land to make space for the upgraded public parking area.



### 5.2.5 ADEQUATE PROTECTION FROM THE ESTUARY MOUTH

- The Coastal Engineering Report endorsed the building position up to the boundary as it is inland of the revetment, and it was confirmed that the revetment is expected to provide adequate protection to the existing buildings when the mouth of the estuary returns to the Lookout Beach location.

### 5.3 COMPATIBILITY OF THE PLANNED DEVELOPMENT WITH THE BITOU INTEGRATED DEVELOPMENT PLAN (IDP) AND SPATIAL DEVELOPMENT FRAMEWORK 2022 (SDF)

- The Bitou Municipal Council has adopted a five-year IDP for the period 2022-2027. The IDP is the principal strategic planning instrument that guides and informs all planning and development, and all decisions regarding planning, management, and development in a Municipality. An IDP provides the strategic direction for all the activities of a Municipality over five years linked to the Council term of office.
- The IDP reflects that the vision, mission statement, key performance indicators, strategic focus areas, and core values remain unchanged. However, in response to the challenges presented by the COVID-19 pandemic and the worsening economic climate, the Council adopted a new set of strategic objectives for the 2022-2027 IDP, which are outlined below:
  - Provide Excellent Service Delivery to the residents of Bitou Municipality;
  - **Re-establish, grow, and expand tourism within the Municipality;**
  - Put relevant control measures in place to ensure efficiency and excellence;
  - Provide basic service delivery to informal settlements and the poor;
  - **Facilitate growth, jobs, and empowerment of the people of Bitou;**
  - To ensure the safety of residents and visitors of Bitou Municipality; and
  - To build institutional and financial sustainability.
- **Re-starting the tourism and events sector** is one of the pillars of the economic recovery plan of the IDP and the implementation has been aligned with the Directorate of Planning and Development.
- **Economic Development and Job Creation** are other aspects that always enjoy high priority in the IDP. Although job creation is not a direct function of the municipality, the municipality does have a

constitutional obligation to create a conducive environment for economic growth and job creation. The municipal strategy is to create a safe environment for investors and develop investor-friendly policies. The aim is to revive and grow tourism in Bitou because tourism is the bedrock of the local economy. In supporting this proposal, the municipality will support a much-needed cash injection into the town.

- The Spatial Development Framework is a spatial representation of the IDP. The Bitou Municipal Council approved the current governing Bitou Municipal SDF in 2022, which replaces the previous (2017) version and aligns with the present IDP.
- The SDF confirms that one of the main economic industries, which is reflected across a number of sectors, is the tourism industry, which is highly seasonal in the Bitou Local Municipal area. The SDF warns that a weakening national economy will affect domestic tourism and therefore have a major impact on the economy of the Bitou. Promoting tourism through supporting new attractions is therefore essential to boost the tourism industry.

## **5.4 COMPATIBILITY WITH SPLUMA PRINCIPLES**

The Spatial Planning and Land Use Management Act (SPLUMA) outlines principles for spatial planning and land use management in South Africa. Upgrading an existing beach, hotel, and adjacent public parking area can comply with SPLUMA's development principles in the following ways:

### **5.4.1 SPATIAL JUSTICE**

- Ensuring the upgrade benefits all members of the community, including historically disadvantaged groups, by improving access to public amenities.
- Providing equitable access to the beach and parking facilities for all users, regardless of their socio-economic status.

### **5.4.2 SPATIAL SUSTAINABILITY**

- The developers have appointed an independent Environmental Consultant to implement environmentally sustainable practices in the upgrade to preserve natural resources and minimise ecological impacts on the sensitive surroundings.
- The ongoing Environmental Impact Assessment will ensure that the development does not negatively affect the coastal environment and process and promotes the sustainable use of coastal resources.

#### **5.4.3 EFFICIENCY**

- Optimising the use of existing infrastructure and urban land by upgrading the existing hotel and parking area rather than developing new areas.

#### **5.4.4 SPATIAL RESILIENCE**

- Designing the upgraded facilities to withstand environmental challenges such as rising sea levels, storms, and erosion.
- Incorporating resilient infrastructure that can adapt to future changes in climate and usage patterns.

#### **5.4.5 GOOD ADMINISTRATION**

- Ensuring transparent and participatory decision-making processes involving all stakeholders, including the local community, hotel management, and municipal authorities.
- Adhering to legal and regulatory requirements, obtaining necessary approvals, and conducting thorough environmental and social impact assessments.

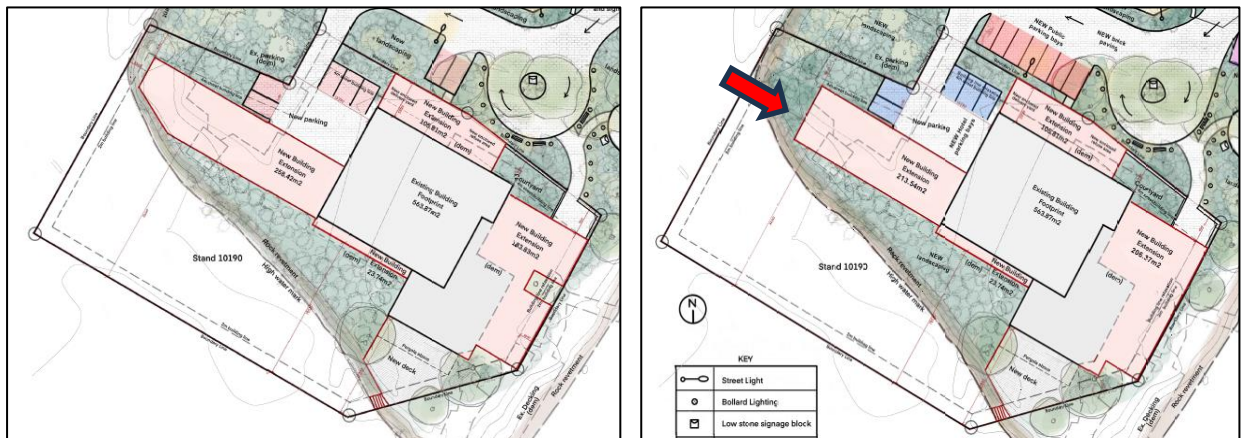
### **5.5 ANTICIPATED IMPACTS OF THE PROPOSAL**

- Sharples Environmental Services CC (SES) has been appointed as the independent Environmental Assessment Practitioner (EAP) to conduct the Environmental Assessments for the proposed additions and alterations to the Hotel and adjacent parking area. The Notice of Intent to Development has been submitted to the Department of Environmental Affairs and Development Planning and the Basic Assessment Report will be advertised for public comment when the Final Assessment Report is available.

#### **5.5.1 THE IMPACT OF COASTAL PROCESSES**

- The conditions that occurred in 2007 are considered extreme events but are nevertheless likely to recur again in the future and should therefore be considered in any new development or ongoing maintenance plans. PRDW was appointed to undertake an expert appraisal of the current state of the Milkwood Manor rock revetment which was installed as an emergency repair after the November 2007 flooding of the Bitou and Keurboom estuaries and to advise on mitigation measures to ensure protection of the planned extensions.

- The Report is attached as Annexure I. The Report concludes that the rock revetment is in good condition. Subject to occasional periodic maintenance, the revetment is expected to provide adequate protection to the existing buildings when the mouth of the estuary returns to the Lookout Beach location.
- The Report predicts that the projected impact of climate change will increase the severity of future storm events which will affect the revetment in terms of increased wave overtopping from the ocean and higher flooding levels from the river. The new structures and infrastructure proposed, are expected to be protected to an acceptable level of risk, subject to the implementation of mitigatory measures.
- To address the future impact of climate change, it was recommended that the planned extension be set back from the western seaside boundary with about 9,45m so that any direct wave loading is avoided.
- It is also recommended to increase the floor levels for any new developments, but specific heights were not provided. The current floor level of the Milkwood Manor is measured at 3.11 above MSL.
- All open areas are to be designed to drain away from the buildings and parking areas back into the estuary.



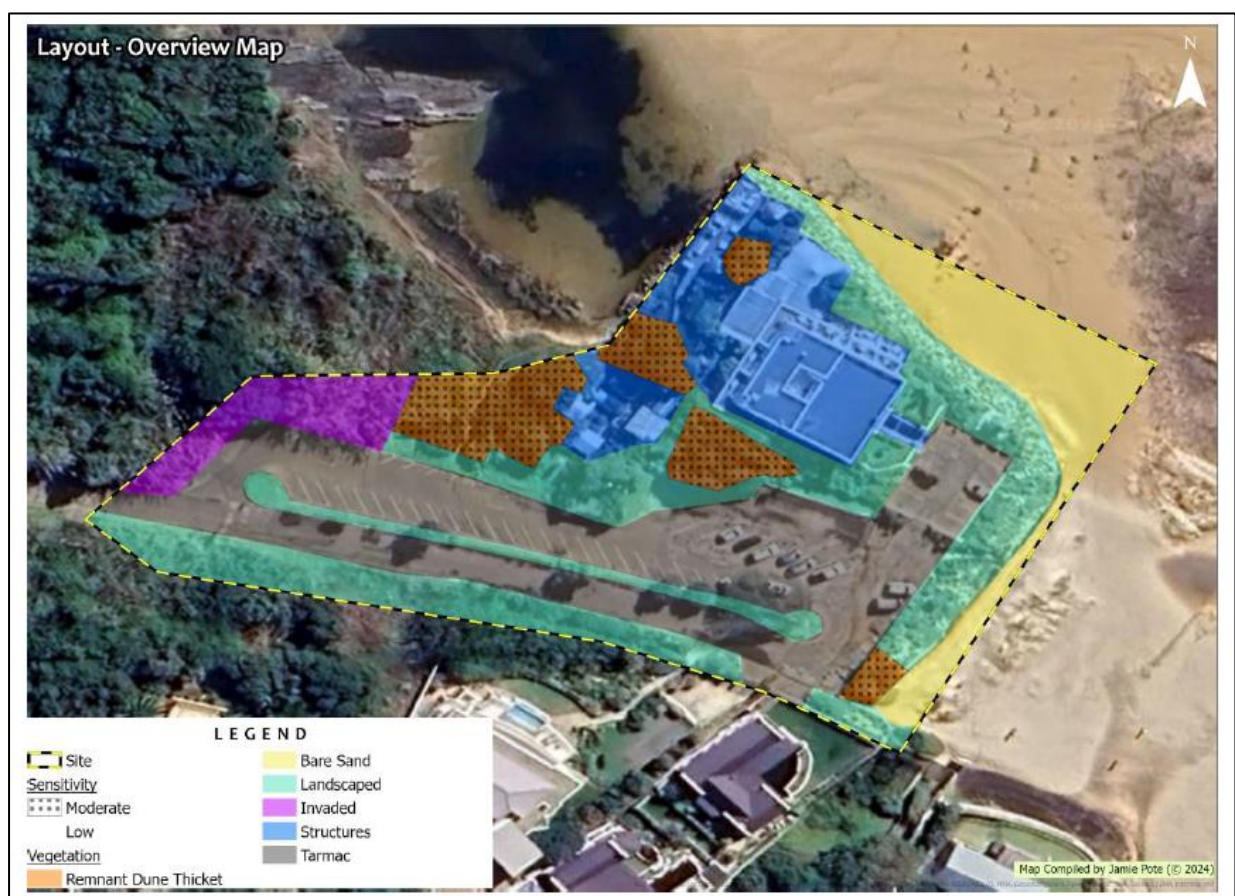
**Figures 8 and 9: Revised position of the building extension.**

### 5.5.2 IMPACT ON BIODIVERSITY

Terrestrial Biodiversity & Plant Specialist Assessment has been conducted as part of the Environmental Assessment prepared by Sharples Environmental Services. The Report is attached as Annexure K. The findings of the Report can be summarised as follows:

- The vegetation on site is generally transformed and comprises a landscaped garden with some remnant dune thicket elements, including several milkwood trees as some associated remnant dune thicket elements. A small pocket of dune thicket is also present at the parking beach access point. This will not be affected by the proposal.

- No sensitive plant or Animal was found to be present or likely to be present. Several Cycads are present but are introduced for landscape garden purposes and are not in a natural context.
- Although some areas are designated CBA 1 & Protected Area, these designations are incorrect as the site is significantly transformed, being a developed erf within an urban area.
- Most of the site is considered to have a LOW Sensitivity due to the disturbed and transformed nature.
- A few minor MODERATE sensitivity patches are designated where Milkwood trees and/or remnant dune thicket are present, which largely have negligible ecological value. The report recommends that the Milkwood trees not be removed.
- No high-sensitivity areas are identified within the terrestrial environment, but the estuarine and dune environments are outside the context of this assessment and report.
- No-go areas are identified within the site footprint.
- No significant direct, indirect, or cumulative impacts are anticipated.
- While the site falls within a broader important ecological area, the specific site is a transformed developed Erf and thus will not contribute in any meaningful manner to either the conservation of ecosystems or ecological connectivity.



### **5.5.3 IMPACT ON THE KEURBOOM ESTUARY**

- Because the renovations to the existing Milkwood Manor House and adjacent parking lot will occur in close proximity to estuarine and coastal habitat, the potential impact on the impacts on the Keurboom Estuary has to be carefully assessed. The entire property and adjacent public parking are located within the Keurbooms Estuarine Functional Zone (EFZ). Confluent Environmental (Pty) Ltd was requested to conduct a specialist Estuarine Impact Assessment for the proposed upgrade of the Milkwood Manor House and the construction of additional public and private parking bays. The Aquatic Biodiversity – Specialist Assessment Report is attached as Annexure L.
- The renovations are limited to the existing developed area of the property that is contained within the rock revetment border. This area is presently covered by buildings, a car park, landscaped rock gardens, and an outdoor dining and recreational area. The renovations will therefore not result in any additional loss of area of estuarine (or coastal) habitat.
- Expansion of the car park will result in the permanent transformation of a narrow undeveloped band of the EFZ. Approximately 170m<sup>2</sup> of this habitat is natural and the remainder (approximately 180m<sup>2</sup>) is transformed.
- The extent of habitat loss is very limited in extent and a natural reedbed buffer (ranging between 15m and 40m) will remain between the car park and the shoreline of the estuary. It is thus unlikely that this loss of habitat will significantly affect the ecological or functional attributes of the broader estuarine system.
- The existing car park has resulted in some erosion of the banks of the estuary (which is currently being stabilised by sandbags). The expanded car park will result in an increase in the area of hardened surfaces, which will increase volumes of stormwater runoff and therefore increase the risk of erosion. Appropriate stormwater management measures must therefore be implemented to mitigate this risk.

### **5.5.4 IMPACT ON HERITAGE RESOURCES**

- Perception Planning was appointed by the developer to submit a Notice of Intent to Develop (NID) in terms of Section 38 (8) of the National Heritage Resources Act, 1999 to Heritage Western Cape (HWC). The Background Information Document (BID) is attached as Annexure J for further information.
- From the assessment it is concluded that the proposal would not impact any structure(s) or landscape of cultural significance, nor is it likely to impact on archaeological or palaeontological resources of cultural significance.

### **5.5.5 IMPACT ON THE CHARACTER OF THE AREA AND SURROUNDING PROPERTIES**

- Erf 10190 has an isolated nature and has no direct neighbours. To the north, east, and west the property borders the lagoon and the beach, and to the south, the property borders the public parking area. Further to the south, there are a number of residential properties that overlook the Milkwood Manor. Presently, the building consists of a double-storey structure, measuring about 8.3m in height.
- There is a planned double-storey extension to the east which will be visible to the properties to the north, but due to the elevated nature of the houses in relation to Erf 10190, they will still be able to overlook the property and the impact on their view will not be significant. This eastern section of the extension is with the set development parameters (height and building lines) of the zoning of the site and therefore within the primary development rights of the property.
- The extensions to the south and the east will transgress building lines and do not fall within the approved development footprint of the site. These extensions will however not be visible from the south as they will be obscured by the existing clump of milkwood trees that is more or less the same height as the current building as well as the planned western extension.
- The renovation of the building and the parking area will have an aesthetic appeal that will enhance the look and feel of the area and should be to the benefit of the surrounding neighbours.

### **5.5.6 TRAFFIC IMPACT ASSESSMENT**

- The proposed upgrades and expansion will result in 10 additional rooms and will not have a substantial effect on the traffic flow in the area, especially considering that the hotel group provides transport to their guests. No changes are proposed to Salmack Road. During summer and holiday seasons the parking area receives a lot of visitors, and the extension and upgrade of the parking area will have a positive impact on parking provision during season.

### **5.5.7 SOCIO-ECONOMIC BENEFITS TO THE WIDER COMMUNITY**

The upgrade and extension of the hotel and parking have a number of positive social benefits for the local economy and community. As a responsible tourism operator, The MORE Collection always tries to minimise the revenue that “leaks” out of the local area where they invest. Employing and purchasing locally and setting up business relationships with local people will help to create employment, transfer skills, stimulate entrepreneurial activity, increase investment in infrastructure, and boost the overall standard of living in your region.



- **Job Creation**

The BITOU IDP highlights unemployment as a key challenge in the town. The hotel expansion project will create temporary construction jobs, providing employment opportunities for local workers. In order to indicate the number of jobs the planned construction project would support; South African national employment multipliers have been used. The latest public domain multipliers sourced are from 2018 and indicate that R1 million of construction spending in 2018 would support the equivalent of 7.07 annual jobs. Similarly, using a simple average for national and provincial government spending, R1 million of spending would support 8.55 annual jobs. These multipliers include direct, indirect, induced, and investment employment impacts.

The construction project will span one year from mid 2025 and the estimated total investment cost is R90M. In order to provide a forecast of employment, the multipliers have been adjusted for inflation from 2019 to 2026, i.e. midway through the project. Average annual inflation for 2019 to 2023 was sourced from Macrotrends.net, and from 2024 to 2026 from Investec Bank forecasts as of August 2024. This inflation adjustment reduces the construction multiplier to 4.98 and the government multiplier to 6.02.

To assess employment, the estimated imported content, at R18 million is excluded from the project expenditure, resulting in R72 million of spend excluding imports and VAT. Applying the employment multiplier indicates that the construction element of the project will support the equivalent of 365 annual jobs in construction, in its supply chain and investment activities, and spending of construction wages and profits.

Most of the projected employment opportunities for low and semi-skilled workers will benefit local Historically Disadvantaged (HD) members of the community. This presents an opportunity for local building contractors and community members employed in the building sector. Although employment opportunities during the construction phase are often considered temporary, it is important to recognise that workers in the construction industry inherently rely on these "temporary" jobs for their livelihood. In this context, "permanent" employment in the construction sector is linked to the ability of construction companies to continuously secure a series of temporary projects over time. Therefore, each development, including the proposed one, contributes to creating "permanent" employment in the construction sector.

Post-construction, the extended hotel will require additional staff for various roles such as housekeeping, maintenance, front desk, management, and food and beverage services. This will lead to long-term employment opportunities for local residents.

The 24-bedroom hotel will employ 65 staff members inclusive of management, middle management, and the general workforce. It is the intention to employ all 65 of these staff members from the local Plettenberg Bay Community. Most (70%) of the employment opportunities will benefit Historically Disadvantaged Individuals (HDIs) from the local community.

- **Training and Skill Development:**

The MORE Family Collection will invest substantially in the training of local staff to be able to deliver the high level of service associated with the MFC brand. It is expected that the cost of training the staff for opening would be R950K. All staff would then receive ongoing training from an in-house team of specialists. The in-house team specialises in Food & Beverage, Guest Relations, Spa, Guiding, and Maintenance. The training programs for new employees will result in skill development and professional growth opportunities for residents. This can have long-term benefits for the community, increasing the employability and skill level of the local workforce.

- **Increased Tourism Revenue for the town:**

The proposed development supports the Bitou Municipalities Local Economic Development Strategy which identifies tourism as a key sector in the local economy. MFC markets its hotels extensively locally and overseas. MFC travels to tradeshow in Europe and the Americas annually and promotes the hotels through both business-to-business and business-to-customer channels. There is also extensive investment in digital marketing platforms and social media. MFC spends over a million annually promoting its hotels and lodges. The marketing of a well-regarded hospitality group in the town can also elevate Plettenberg Bay's status as a premier tourist destination. This can increase awareness and expose the town to new tourism markets for both domestic and international travellers.

The expanded hotel can accommodate more tourists, leading to increased spending in the local economy. Visitors will spend on local attractions, restaurants, shops, and recreational activities, boosting the overall revenue for local businesses. With more tourists' local suppliers and service providers will benefit. This includes food and beverage suppliers, laundry services, transportation companies, and local artisans. The multiplier effect will see a rise in demand for these businesses, leading to economic growth.

## 6. CONCLUSION

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To facilitate the planned extensions of the Milkwood Manor situated on Erf 10190 Plettenberg Bay, this application seeks to request the following planning approvals in terms of the Bitou Municipality: Land Use Planning By-Law:

- i. Section 15 (2) (b): Departure for the provision of on-site parking (38 bays to 5 bays) in lieu of the upgrade and extension of the public parking area situated on the adjacent Erf 2066 and 706, as agreed by Council (See Council Resolution C/6/142/06/24 attached hereto as Annexure D).
- ii. Section 15 (2) (b): Departure from the western lateral building line from 2m to 0m to permit the extension of the existing building.
- iii. Section 15 (2) (b): Departure from the southern street boundary from 4m to 0m to allow an enclosed refuse yard and generator room.
- iv. Section 15 (2) (g): Permission in terms of a Zoning Scheme for the approval of the proposed Site Development Plan.

**The reasons for the Approval of the Applications can be summarised as follows:**

### **Property Use and Zoning Compatibility:**

- Milkwood Manor is zoned General Residential III and has been operating successfully as a Boutique Hotel and Restaurant since 1997. The proposal proposes 10 additional rooms and a smaller restaurant, which is in line with the zoning of the property.

### **Efficient Use of Space and Facilities:**

- The development footprint is severely impacted by the rock revetment and prescribed setback lines from the ocean. The relaxation of building lines will optimise space usage within the confined land available and suitable for development.

### **Parking and Public Infrastructure Improvements:**

- Historical use of the adjacent public parking has been acknowledged.

- The use of public parking facilities is permitted in terms of the Zoning Scheme By-Law, provided that it is supported by the Council.
- The upgrade of the parking is supported by Council.
- Proposed upgrades to the public parking area will address the shortfall of onsite parking and will enhance local infrastructure including the provision of bus parking facilities, ablution and shower facilities.

#### **Municipal Services:**

- The Municipal infrastructure is available and has enough capacity to support the increased demand expected for the extension of the hotel.

#### **Alignment with Planning Principles and Frameworks:**

- The proposal aligns with the Bitou Integrated Development Plan (IDP) and Spatial Development Framework (SDF).
- Adherence to SPLUMA principles of efficiency, spatial resilience, and good administration is demonstrated.

#### **Environmental and Heritage Considerations:**

- Anticipated impacts on coastal processes, biodiversity, the Keurboom Estuary, and heritage resources have been assessed and it was concluded that the proposal will not have any detrimental environmental impacts.
- Mitigation measures are planned to minimise negative effects and preserve the area's character.

#### **Economic and Tourism Benefits:**

- The upgrade will enhance Plettenberg Bay's high-end tourism offerings adding to the inflow of foreign spend into the local economy.
- Increased accommodation capacity from 14 to 24 rooms will attract more tourists and boost the local economy.
- Create 65 permanent jobs and support skill development through in-house training programs.