

MOTIVATION REPORT

**PROPOSED SUBDIVISION AND REZONING OF
REMAINDER FARM VAALEY VALLEY No. 219,
SITUATED IN THE MUNICIPALITY AND
ADMINISTRATIVE DISTRICT OF MOSSEL BAY IN
TERMS OF SECTION 22.(2) OF THE SPATIAL
PLANNING AND LAND USE MANAGEMENT ACT,
2013 (SPLUMA).**

HARTLAND

Lifestyle Estate



Stads- en Streekbeplanners
Town and Regional Planners

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1. APPLICATION

This application, which is based on 'Site Specifics' as provided for in Section 22.(2) of the Spatial Planning and Land Use Management Act, 2013, provides for the following in terms of the relevant Sections of the By-Law on Land Use Planning for Mossel Bay Municipality, 2021:

- 1.1. The Subdivision of Remainder Farm Vaale Valley No. 219 as follows:
 - 1.1.1. Portion A = ± 26.8ha;
 - 1.1.2. Remainder Farm Vaale Valley No 219 = ±338.3ha; and
- 1.2. The Rezoning of Portion A from Agriculture Zone I to a Subdivisional Area; and
- 1.3. The development of the abovementioned Subdivisional Area in Phases as set out and shown in Table 1 on Plan No HB/C/211-2.

2. PURPOSE

As will be discussed in this report these facilities are strategically located within an area that aligns with the future spatial planning objectives of Mossel Bay Municipality. The subject of this application, however, pertains to only a small portion of the property. The application is therefore based on 'Site Specific' considerations and does not constitute an amendment to the MSDF although it is well-positioned in relation to existing and planned infrastructure networks and lies within the logical urban growth direction of the town. The primary purpose of this application is to proactively address social needs of the existing and future communities in this area – needs that are unlikely to be met through Provincial and National initiatives due to financial constraints. Unlike profit-driven residential projects that generate additional demand for social facilities, this proposal seeks to respond responsibly to existing and foreseeable community needs thereby contributing to the creation of a more balanced and sustainable living environment in an area identified as the most appropriate and sustainable location to accommodate the long-term growth of the Greater Mossel Bay and its hinterland.

3. BACKGROUND.

Portion 11 of the Farm Vaale Valley No. 219 on which the Hartland Lifestyle Estate development was initiated previously also formed part of Farm Vaale Valley No. 219. The remainder thereof is the subject of this application. After a Guide Plan amendment, the land use designation of the portion thereof situated between the N2 and the coastline, extending approximately 370ha, changed from Agriculture to Township due to the low agricultural potential thereof and pressure for urban expansion. After subdividing Farm 219 the portion on which Hartland Lifestyle Estate is now being developed, became Portion 11 of the Farm Vaale Valley No 219, while an abutting portion thereof on which Hartenbos Landgoed was developed became Portion 10 of Farm 219.

Due to global economic constraints in the past which gave rise to time constraints only a limited number of approved development phases could be implemented at Hartland. The remaining phases lapsed. An application for the reinstatement of these lapsed phases on Remainder Portion 11 of Farm Vaale Valley No. 219 was approved once again on August 2023. According to this approval Hartland will eventually offer a total of approximately 2300 residential opportunities which include single residential, group housing, retirement apartments with associates facilities, flats, inclusionary housing as well as a business component. Since the first house was built at Hartland Lifestyle Estate in 2021 sixteen of the approved phases have either been developed and/or in the process of development. Application for the subdivision of the remaining five phases are presently in the process of completion.

When the Pre-Application was submitted, it was explicitly stated in the application form and clearly indicated on the accompanying plan that the application was being made in terms of Section 22.(2) of the Spatial Planning and Land Use Management Act, 2013 (SPLUMA). Accordingly, the consideration of the proposal should be based on site-specific circumstances, as it involves only a relatively small portion (approximately 26.8ha) of a 365.1684ha property situated directly adjacent to the urban edge. However, in its response, dated 21 August 2025, the Municipality incorrectly treated the submission as an application for an amendment of the Spatial Development Framework (SDF), under the

assumption that the entire 365.1684ha farm formed part of the application. Notably, no reference was made in their response to the site-specific nature of the application as provided for under Section 22.(2) of SPLUMA (see Annexure 11 for Municipal response to Pre-Application).

A follow-up meeting was thereafter arranged with the Municipality to clarify this point. Despite the applicant's clear explanation that only a limited portion of the property is involved and that the application as correctly lodged in terms of Section 22.(2) of SPLUMA, the Municipality persisted in insisting that it should be dealt with as an SDF Amendment. This position is inconsistent with their own earlier correspondence in which the applicant was advised to proceed in terms of SPLUMA.

As discussed comprehensively in Par. 6 of this report, the application in terms of Section 22.(2) of SPLUMA, is without doubt, the correct and appropriate approach.

4. MOTIVATION.

4.1. Need.

To effectively motivate the need for the developing a secondary school, a university and a medical centre, it is essential to evaluate not only the growth of the Greater Mossel Bay itself, but also the rate of development within this part of the municipal area.

Considering the extent of development presently taking place in the immediate proximity of Remainder Farm 219, viz. Hartland Lifestyle Estate (approx. 2300 residential units including a primary school), Outeniquasbosch (±640 units), Hartenbos Landgoed (184 units), Monte Christo (±437 units), Mystic Views (±160 units), New Vintage Lifestyle Estate (±437 units) and Sonskynvallei (±623 units) it is evident that this area is the preferred direction for the present and future expansion of Mossel Bay.

As mentioned in Par. 5.3.1 in the Spatial Development Framework for Mossel Bay Municipality does in fact identify Remainder Farm 219 as a possible future scenario for the expansion of the urban edge. The development of a regional shopping centre, viz. the Garden Walk, approx. 80m due south of Remainder Farm 219, illustrates the strong emphasis placed by the free market on this area as a preferred direction for future urban growth. The pace and scale of recent private sector investment clearly indicate a high level of confidence in the long-term viability and desirability of this location. Market-driven development trends typically follow demand patterns, signalling anticipated population growth, increased residential development and rising service needs. This underscores the importance of proactive planning to provide essential social infrastructure, including educational institutions, healthcare facilities and other community services to ensure that growth is both sustainable and aligned with the needs of the current and future residents. Therefore, the existing business and residential development in combination with the development of the proposed social facilities address a critical need for social and community facilities in a region experiencing rapid growth and transformation. The Mossel Bay municipal area, and particularly the section earmarked for this development, has demonstrated consistent and accelerated urban expansion over the past decade. This trend is further reinforced by significant private sector investment, which highlights the market's strong confidence in this area as the preferred direction for future growth.

Current and planned residential developments, combined with increased economic activity, will lead to substantial population growth and a corresponding rise in demand for essential services.

Educational facilities such as a secondary school and a university are necessary to accommodate the needs of a growing population, reduce community distances and support local skills development. Similarly, the establishment of a medical centre is vital to ensure accessible healthcare services, reducing pressure on existing facilities and enhancing the overall well-being of residents.

The proposed development aligns with the objectives of the Spatial Development Framework (SDF) for the future and municipal planning policies which promote balanced growth, integrated service delivery and the creation of sustainable communities. Failure to provide these critical facilities in close proximity to major growth nodes would compromise the functionality of the urban system, increase travel distances and negatively impact quality of life.

Therefore, the proposed development is not only desirable, but essential for fostering socio-economic development, meeting community needs and ensuring that the town grows in a structured and sustainable manner.

The need and desirability of the proposed development can be enriched with the following data-driven evidence, viz.:

- **Context and Urban Expansion.**
Mossel Bay Local Municipality has seen its population surge from 89 430 in 2011 to 140 075 in 2022, representing a robust average annual growth rate of 4.4% per year. This rate significantly exceeds national trends and underscores strong development momentum throughout the municipal area.
- **Market-driven Growth Trends.**
In 2023 – 2024, Mossel Bay ranked first in the Western Cape destinations for semigration, attracting over 6 400 households relocating from other provinces – more than triple of the next region, viz. Gauteng. Strong demand continues across all segments, including retirees, remote professionals and growing families, driving upward pressure on property prices and accelerating residential development and the demand for social facilities.
- **Development Intensity and Infrastructure Expansion.**
High demand has spurred the construction of multiple lifestyle estates, mixed-use developments and housing expansion in suburbs such as Monte Christo, Outeniquasbosch and Hartland Lifestyle Estate. Ongoing investment in infrastructure, of which the bulk municipal reservoir on Jakkalskop is an example, and municipal upgrades reinforce marked confidence, positioning this sub-area as a key urban growth corridor.
- **Social Infrastructure Gap: Education and Healthcare.**
Population growth is concentrated in younger family segments; around 18% under age 15 and nearly 15% over the age 65 – indicating rising demand for both schooling and primary healthcare services. Although private healthcare options and a day hospital have emerged, capacity constraints remain as population scales up. Meanwhile, Curro Private School has expanded, yet there is still insufficient provision for local educational capacity, especially at tertiary level.
- **Policy Alignment with Municipal Spatial Planning.**
The Fifth Generation Integrated Development Plan (2022-2027), alongside the Municipal SDF, prioritises growth nodes in Mossel Bay not only for the present demand, but identifies also areas for “the foreseeable expansions in a possible future scenario” which includes Remainder Farm 219.
The proposed development directly aligns with the frameworks for the future by focussing public and private investment in designated areas.

Furthermore, the establishment of the proposed facilities is both necessary and timeless, ensuring structures, equitable growth, reducing service backlogs and positioning the Municipality to sustainably serve its evolving demographic and economic base.

The above rationalization is based on broad town planning considerations affecting the role different complimentary land uses can play in satisfying the needs of a community. The specific demand for the land uses now applied for, however, needs to be addressed individually as follows:

4.1.1. SECONDARY SCHOOL

Presently there are 575 developed residential units of which 130 units are presently under construction at Hartland Lifestyle Estate. Phase A of this development provides for a private primary school which is bound to be constructed in 2025. By virtue of the locality of this school, in relation to not only the entire development at Hartland Lifestyle Estate and the high order traffic routes in the immediate proximity thereof, but also the attractiveness and safety of Mossel Bay and environs as a popular destination for permanent residency, it is foreseen that a need will also arise for a secondary school to support it. This eventually became a reality when parents of primary school children who bought properties in Hartland Lifestyle Estate started putting pressure on the developer to also provide for a secondary school in the close proximity of Hartland to accommodate the children

finishing Grade 7. The demand for a secondary school increased as also prospective new buyers at Hartland became adamant about the availability of such a facility in the close proximity of the primary school. This became a prerequisite for some resettling in Hartland in the process of semi-emigrating to the Southern Cape.

The developable portion of Remainder Farm 219/11 is fully taken up by approved existing and future residential related development. Inquiries were made to the Municipality regarding the availability of vacant public land for the purpose of developing a secondary school in this part of Mossel Bay. No suitably located vacant public owned land earmarked for schools was, however, available in the eastern part of Mossel Bay, while Hartland is approximately 13.5km away from Punt High School. The latter offers more or less the same educational exposure as the proposed school envisaged at Hartland, while the school at Outeniquasbosch caters for a niche market as a private English school. The distance between Punt High School and the subject of this application combined with the congested Louis Fourie Road as the main connection route to the school, pose a daunting challenge, especially during business and school peak hours which are at the same time. Furthermore, it should also be pointed out that Punt High School has a capacity for 1300 learners, but for all grades there is a long waiting list according to the secretary of the school. Outeniqua High School, some 40km away, is experiencing an even more challenging situation due to an even longer waiting list. The rapid growth taking place in the Garden Route is mainly due to the influx of people who come to reside here permanently. It puts additional pressure on the availability of a wide range of social services, such as schools, which are normally supposed to be provided for by the central and provincial governments.

Furthermore, it is also foreseen that thanks to the much sought-after living conditions and moderate climate of Mossel Bay that this secondary school will also attract learners from all over the country. Consequently, the land proposed for the school will also provide for a school hostel. Due to financial constraints the authorities are, however, not in a position to fulfil these obligations. The establishment of a privately funded school in an area facing a severe shortage of educational facilities represents a valuable contribution that should be welcomed and supported.

The portion of Remainder Farm No. 219 required for the secondary school is situated right across the N2 and R102 from the proposed primary school in Hartland Lifestyle Estate, some 80m away, which will be the major catchment area for this school. The R102 as well as the N2 Route with off-ramps serving as major east/west traffic corridors in the Southern Cape are in the immediate proximity thereof. These two roads as well as the northbound R328 facilitate easy access to the proposed secondary school from Hartenbos in the west to all the seaside villages and farms up to Glentana in the east as well as the area north of Mossel Bay along the Brandwag road.

The aforementioned rationalization is based on a town planning perspective, but according to scientific research conducted by DEMACON MARKET STUDIES, a professional firm specialising in this field, it was also concluded that a secondary school with associated facilities are not only justified, but also indispensable for the Greater Mossel Bay area. These findings are based on the following extract from a summary of Conclusions and Recommendations by DEMACON:

“DEMOGRAPHIC OVERVIEW

PRIMARY MARKET SUMMARY (delineated by an approximated 20-minute drive time isochrones)

- Approximately 969 577 people / 374 440 households reside in the primary market area.
- The average annual growth rate of population is 2.66% per annum, while the average annual growth rate of households is 4.30% per annum.
- The profile shows a proportionally large contribution of the population aged 0-19 years (31.5%) indicating a large portion of children of the appropriate age to go to school. Further to this, approximately 7.7% of the population are of high-school age (ages 15-19).
- The racial profile of the primary market area shows that the largest proportion of the population are Black African (76.2%), followed by the White (22.1%) racial group.

- Approximately 70.1% of the population of the primary market area are economically active. Of the economically active population, 75.1% are employed and 24.9% are unemployed. The primary market area is characterised by fairly low unemployment levels, reflecting low dependency ratios.
- The primary dwelling type for households in the primary market area is formal dwellings (76.2%). The largest segment of formal dwellings is free standing houses on single erven (57.8%).
- Of households in the primary market area, 29.9% own the dwelling/property in which they reside and have fully paid the bond registered to the property with a further 18.5% of households in the process of paying off their bond.
- A large segment of households (31.6%) rent their current dwelling, whilst 19.9% occupy their current dwelling rent-free.
- The weighted average annual household income for the resident population for 2023 amounts to R218 091 per annum, which amounts to R18 174 per month for all SEM groups.
- For SEM groups 2 and higher, the average income is R514 071 per annum, which amounts to R42 839 per month.
- Approximately 53.3% of the primary market area's households are classified within the SEM Super group 1, being the largest portion of the population. Approximately 46.7% of the households in the primary market area are classified within the SEM 2+ Super groups”.

“SCHOOL SUPPLY

This section provided an overview of the education market supply in the market area. The following summarise the findings of the education supply:

- The primary market area comprises 1 private combined school, 1 private intermediate school, 1 private primary school and no private secondary school.
- The primary market area comprises 1 public combined school, no public intermediate school, 13 public primary schools, and 3 public secondary schools.”

“MARKET DEMAND SUMMARY

This chapter provided an overview of the private education market trends underlining the source market area. The following summarises the findings of the private high school demand in terms of the net demand modelling:

Demand Model

- DEMACON's Demand Modelling results illustrate that the market can sustain a private school.
- In order to model the demand for a private high school for the target group of learners, a baseline and optimistic scenario was modelled. The purpose of the scenarios is to consider differences in market attendance and market capture rates.
- Given the specific target market that the proposed private high school wishes to target, the model has been calibrated to account for the number of students in the target group-approximately 86% of the population in the primary market area are in this area.
- The model has been calibrated to take into account the SEM profile of the primary market area (SEM 2 to 5 are considered) as well as the age groups applicable to high school attendance.”

“Demand Modelling - Baseline Scenario

- The baseline scenario factors a market capture rate of 15-25%, considering that 25% of the school-going children in the market area would attend a private school.
- Under the baseline scenario, potential exists for the development of a facility catering to approximately 300-350 high school pupils over the short term to medium term, increasing to ±400 pupils over the long term.”

“Demand Modelling – Optimistic Scenario

- The optimistic scenario also factors a private school attendance of 30% with a market capture rate of 15-25%.
- Under the optimistic scenario, potential exists for the development of a facility catering to approximately 400-450 high school pupils over the short term to medium, increasing to ±500 pupils over the long term.”

“Recommendations – Private High School

- The optimum point of market entry is estimated to be 2025+.
- It can be concluded that there is a demand for a private school, as previously eluded in the survey results (81% of the 70% of respondents that do have children in high school or have children going to high school in the near future would consider enrolling / transferring their child / children to a private school in Hartenbos, specifically Hartland).
- In the survey analysis, it is apparent that majority of respondents are willing to pay a monthly tuition fee of between R2 000 – R4 000 for a private school (excluding a boarding facility).
- It is suggested that reputable market operator is secured for the operation of the proposed private high school. “

“Recommendations – Boarding Facility

- Once the proposed private school gains traction and is well established, a boarding facility could be considered.
- A boarding facility represents a fixed asset that, if maintained, will appreciate in value over time. The cost-effectiveness of a boarding facility, however, depends on the school reaching maturity and generating sufficient interest to fill the majority of boarding opportunities available.
- In the survey analysis it is apparent that approximately 43% of respondents would consider putting their child in a boarding facility if their child is in high school. Therefore, in terms of the survey, there is a moderate demand for a boarding facility to form part of the development of a private high school.
- Considering the preceding, the survey results indicate that 33% of respondents are willing to pay between R2 000 – R3 000 per month for a boarding facility. However, approximately 22% of respondents are willing to pay between R6 000 – R7 000 per month for a boarding facility, indicating a possible higher-income market that could be tapped into.”

“5.4 GAP ANALYSIS

<u>Development Type</u>	<u>Effective Market Gap</u>	<u>Development Prospects</u>
Private High School	✓	Moderate to High
Boarding Facilities	✓	Moderate

The above indicates that there is a moderate to high demand for a private school in the primary market area, with a moderate demand for a boarding facility.

Market Gap	Yes
Development Prospects	Moderate to High for a private high school Moderate for a boarding facility
Demand Modelling Results	Baseline Scenario – 300- 350 high school students Optimistic Scenario – 400 – 450 high school students
Optimum Point of Market Entry	2025+ ”

4.1.2. PRIVATE ACUTE MEDICAL FACILITY

A feasibility study for the development of a Private Acute Medical Facility was conducted by Fernridge Healthcare in 2024. The results are as follows:

- “The objective of the study was to determine the feasibility of a private acute medical facility, in Hartenbos, Mossel Bay, Western Cape.
- The proposed site is located along the R102 in Hartenbos and will form part of the larger Hartland Lifestyle Estate.
- The Mossel Bay Local Municipality economy contributed 1.32% of the total Western Cape Provincial GDP (R10 Million). The largest sector in the region is the Finance & Business Services sector.
- Mossel Bay acts as a central place within the area and because of this the proposed private hospital could also potentially attract support from the surrounding towns like Stillbaai and others west of Mossel Bay – high inflow is expected from surrounding towns.
- There were moderate to high traffic volumes observed passing past the site throughout the day, which will provide the site with excellent top of-mind awareness.
- The proposed commercial node/retail shopping centre close by, will also add to the synergy for the site.
- Based on an as-is scenario the site rated as 86/100 - excellent site rating.
- Mossel Bay has 1 private acute hospital (Bay View Private Hospital) that has 147 beds.
- There was an average dwelling growth of $\pm 1.17\%$ between 2020 to 2024 within the catchment area, a growth rate used to project to the 2025 dwellings.
- The average household size, according to the 2022 Census is 3.18, which works out to a population of $\pm 126,167$ people by 2024 for the catchment area.
- Approximately 50% of the population is representative of the private healthcare target market group (Beneficiaries of both Open and restricted schemes).
- The underlying Demand for the catchments was determined from our most recent Africa Eye demographic database combined with other Stats SA secondary data. The medically insured population was calculated from the latest Africa Eye Demographic Income Segmentation.
- The target market / insured population is defined as 100% of C to A+ income dwellings, based on Fernridge’s Benchmark Model.
- From the aforementioned demographic data sets, it was deduced that the catchment area consists of $\pm 63,732$ people who form the estimated private healthcare target market (beneficiaries) in 2025.
- The insured population was modelled based on admission of 212.2 per 1,000 people to calculate the demand for a private acute hospital.
- Based on the Private Bed Demand Model, there is demand for 130 private beds, which can be supported by the local market ($\pm 63,732$) at an average length of stay of 3.4 days, for a private acute hospital in 2025. In addition to the 130 private acute beds, there is a demand for 71 dedicated oncology beds as part of the proposed private hospital. This then brings the total bed demand to 201 beds in 2025.
- In our professional opinion we strongly believe that there is an urgent need for an additional private acute hospital in Mossel Bay, in order to help relieve the pressure and reduce outflow to George.”

Provision to be made for the following:

“Medical Services:

- Internal Medicine;
- Obstetrics and Gynaecology;
- Paediatrics;
- General Surgery;
- Orthopaedic Surgery;
- Neurosurgery;
- Otorhinolaryngology;
- Intensive Care;
- Neonatology;
- Emergency Medicine; and
- Oncology.”

“Theatres:

- Minor Theatres: 3;
- Major Theatres with Laminar Flow: 5; and
- High-Level Recommendations on Bed Configuration”

“High-Level Recommendations on Bed Configuration:

- Adult General Medical beds 30;
- Adult General Surgical beds 30;
- Day Ward beds 6;
- Medical Oncology beds 35;
- Surgical Oncology beds 36;
- Gynaecological beds 10;
- Obstetric beds 10;
- Paediatric beds 10;
- Adult ICU beds 16;
- Adult High Care beds 12;
- Neonatal ICU beds 2;
- Neonatal High Care beds 4; and
- TOTAL BEDS = 201.”

With a previous feasibility study carried out to determine the need and desirability for a medical facility on Farm Hartenbosch 217/58 it was concluded that it was justified in this part of the Greater Mossel Bay. The only other existing medical centre is situated in the central area of Mossel Bay some 12km away. Consequently, an approval was issued by the Municipality for the development of a private hospital on the said property which is located only 75m south of the subject of this application, viz. Remainder Farm Vaale Valley No 219. The owner of this property, however, decided to rather develop a regional shopping centre on it. This decision is most likely based on the economic reality that the main direction for the long term future expansion of the Greater Mossel Bay will take place in this area towards Remainder Farm 219 which is also highly accessible from the villages to the east and the surrounding farming communities in the hinterland thereof. According to the national census, the population growth of Mossel Bay increased in 2001 to 2022 from 71 494 people to 140 075. The growth to 2027 is expected to be 147 220 people, which implies an annual growth rate of 1.0%. Therefore, the Spatial Development Framework for Mossel Bay when amended in June 2022 provided for the demarcation of the entire Remainder Farm Vaale Valley No. 219 for the “foreseeable expansions in a possible future scenario”. Considering the rapid growth taking place at Hartland since the first residential unit was constructed in July 2021, as pointed out in par. 4.1, it is foreseen that the growth rate will exponentially increase to figures higher than what is officially expected. Meeting the demands of the foreseeable future has now become a matter of urgency.

Considering that Farm 219/58, as previously noted, can no longer be used for the development of a private hospital, it is evident that identifying an alternative site that offers similar advantages in terms of accessibility, location and exposure within the catchment area, is a sensible and necessary response to this reality. Therefore, it is inevitable that this land will eventually need to be made available for the purpose of satisfying the foreseeable need for the development in this rapid growing town in order to curb coastal sprawl. This reality is not a matter to defer. It requires the immediate attention of all stakeholders, given the current demand for land to accommodate essential social facilities. As a rule, these facilities are supposed to be provided for by state and provincial departments, but due to the financial constraints experienced on that level it does and will not materialize.

4.1.3. UNIVERSITY

Matric Pass	2024 Matrics	2025 University intake (%)	University Intake	Under Supply
Higher Certificate Pass	89 244	11%	22 220	67 024
Diploma Pass	188 748	28%	56 560	132 188
Bachelor Pass	337 158	61%	123 220	213 938
	616 150		202 000	413 150

The Southern Cape is relatively undeveloped economically due to the absence of strong manufacturing and production industries to support goods export as a sustainable economic base. This is primarily due to the lack of raw materials and the cost to import it and to export the manufactured products to the major outlet markets elsewhere in the country. Even the agricultural sector is also not strong enough to function as an economic base due to various factors including an unreliable rainfall pattern, unsustainable local markets, etc. The economic base of this region is primarily based on the service industry. This industry is basically dependant on tourism which is an unreliable industry due to fluctuating global markets unless special measures are put in place to mitigate it. This can be achieved by exploiting the natural assets of Mossel Bay which include a moderate Mediterranean climate, safe sandy beaches and a harbour suitable for harbouring international tourist ships. It already makes it a preferred destination for tourists and permanent settlement. These are vital considerations which attract especially skilled labour to activities/ services such as schools, hospitals and tertiary institutions like universities.

The need for the two first mentioned institutions have already been discussed. With regard to a university the common argument in the media is that 377 158 Grade 12's matriculated in 2024, while only 202 000 first-year places are available at public universities in 2025. The shortfall is about 175 000. According to an analysis by STADIA HIGHER EDUCATION the reality is far worse as illustrated in the Table Below:

- IEB exams add almost 14 000 Matriculates in 2024 of which most passed with Bachelors.
- About 120 000 learners write the NSC part-time each year.
- About 100 000 adults write the Adult Matric (SC) each year.
- About 20% of first-year classes contain Grade 12's from previous years (not 2024).
- About 15% of first-year places are taken up by Unisa (mostly adults).
- 7.5% of university spaces are for SADC students.

According to current findings, there is a significant shortage of tertiary education institutions in South Africa, a concern that is particularly pressing in the Southern Cape. The majority of students from this region currently pursue higher education at universities located in Potchefstroom, Stellenbosch and Cape Town. At present, only three university campuses are situated at the coast, namely, the University of Cape Town (UCT), the University of KwaZulu-Natal (UKZN) in Durban and Nelson Mandela University in Port Elizabeth. The coastal location of these institutions often plays a role in the decision-making process of both students and academic staff.

Given that Mossel Bay is widely regarded as the town with the most moderate climate in the country, the establishment of a university here, where the South Cape College is currently the only tertiary institution, would be a strategic and appropriate development for the Mossel Bay Municipal area. In support of the broader Mossel Bay community, the developer is willing to make land available on reasonable terms for the establishment of a university. This offer aligns with the goal of positioning Mossel Bay as a key destination for future growth, especially considering the developer's ownership of both Remainder Farm No. 219 and Hartland (Remainder Portion 11 of Farm Vaale Valley No. 219).

The scale of existing and planned residential development in the immediate vicinity, as discussed in the above, including Monte Christo, Outeniquasbosch, Mystic Views, New Vintage, Hartenbos Landgoed and Sonskynvallei, will inevitably lead to an increased demand for social facilities, not only for schools and healthcare, but also for higher education. While the demand by Mossel Bay alone may not fully justify the development of a university, the same need exists throughout the broader Southern Cape region, which continues to experience above-average population growth.

However, it is unlikely that either the provincial or national government will take the initiative to address this educational shortfall. As a result, it will fall to the private sector to respond to the need generated by residential expansion growth for which they are ultimately responsible.

This proposed institution will in combination with the Hospital and Secondary School promote the growth of Mossel Bay as a well-balanced town which, apart from fulfilling the social needs of the community, manifests various benefits including economic opportunities, improved infrastructure and a higher quality of life. These benefits can be attributed to factors like increased job creation, enhanced social amenities and services as well as better land use management of which all contribute to a more vibrant and thriving community. The impact thereof in combination with the other institutions as a concentrated node of excellence serving the social needs of a broad spectrum of the community brings numerous benefits. These benefits include economic growth through job creation, increased local spending, a skilled labour force, improved social and cultural life as well as attracting talent and fostering innovation.

Hereby attached a letter by STADIO Investment Holdings, dd. 2 June 2025, expressing their interest in acquiring the tertiary building that is planned as part of the proposed development.

4.1.4 Summary

Considering the individual role each of the above discussed social facilities play in serving the basic needs of a community, the collective contribution thereof when group together can be outlined as follows:

Benefits of grouping a hospital, school and university:

1. Educational and Training Advantages.

- Hands-on experience: University students, especially these in Medicare, nursing, psychology or education, can gain desired supervised experience in real-world environments.
- Internships and Placement: Easy access to hospitals and school facilities internships, practicums and student-teaching programs.
- Inter disciplinary learning: Encourages collaboration across disciplines, such as healthcare students working with education or child development initiatives.

2. Research and Innovation:

- Collaborative research: Universities and hospitals or schools can partner on clinical trials, public health studies or educational research improving innovation and outcomes.

- Access to data and subjects: Proximity allows easier recruitment of participants and faster data collection.
 - Pilot programs: Schools and hospitals can serve as real-world labs for testing new teaching methods, therapies or healthcare technologies.
3. Community and social benefits:
- Improved community access: Residents benefit from a central hub for health, education and advanced learning.
 - Stronger outreach programs: These institutions can jointly provide wellness programs, health education, literacy campaigns and youth development activities.
 - Shared infrastructure: Public transport, green spaces and utilities can be optimised for all institutions.
4. Economic Efficiency:
- Shared resources: Facilities like libraries, cafeterias, sports centres or auditoriums can be shared, reducing redundancy and cost.
 - Attracting investment: Clusters of educational and healthcare institutions can attract financing, grants and philanthropic support.
 - Job Creation: A centralised hub can become a major employment centre in the region.
5. Health and well-being:
- School based healthcare: Schools near hospitals may have better access to paediatric care, vaccination programs and emergency services.
 - Mental health support: University counselling departments and hospital psychologist can work together to support students and local school children.
6. Urban Planning and Sustainability:
- Efficient land use: Consolidating major institutions within one area can reduce urban sprawl and support sustainable development.
 - Reduce commute times: Facility staff, students and hospital staff can move easily not only between the different facilities, but also between the residential neighbourhood in the close proximity thereof which reduces traffic an urban footprint.

PLEASE NOTE:

The rapid pace and extent of residential development in this area, with Hartland Lifestyle Estate being the single largest contributor, have highlighted a critical shortage of social facilities, particularly healthcare services, which constitute a basic human need. This imbalance has become a growing concern for the developer especially in view of his intention to expand Hartland onto the remaining approximately 337ha of Remainder Farm No. 219 once all current phases have been completed. The lack of adequate healthcare facilities is already a matter of concern among existing residents as well as prospective buyers within the estate, as it directly affects both the quality of life and the long-term sustainability of the area.

Acknowledging the substantial role his development plays in shaping this community, the developer of this estate considers it his social responsibility to contribute meaningfully towards addressing these deficiencies as it is highly unlikely that the Provincial and Central Governments will take the initiative to do it. To this end, he proposed to make land available for the development of essential social facilities, with particular emphasis on medical care as the most pressing and fundamental need.

In support of this initiative, specialist professional firms were appointed to undertake comprehensive need and desirability assessments for the proposed facilities. The conclusive findings, as reflected in this report, confirm the urgent demand for accessible healthcare and educational infrastructure in this growing settlement.

Although the specialist's study focuses on the development of an acute medical facility and is discussed as such in this report, the developer's vision is to initially establish a day hospital with aftercare facilities as a first phase, which will subsequently be upgraded to a fully-fledged acute medical clinic once the extent of residential development and the size of its broader catchment area,

as discussed in this report, justify such an expansion. The findings of the specialist study therefore serve as an indication of the basic healthcare needs in this area, particularly given its extensive hinterland as discussed in this report. This proactive approach not only demonstrates social responsibility, but also gives practical expression to the core spatial planning principles of both the Western Cape Spatial Development Framework and the Mossel Bay Spatial Development Framework – namely the promotion of integrated, sustainable and resilient settlements that provide equitable access to social and economic opportunities. By facilitating the timely provision of a critical community service in close proximity to major residential development, the proposal directly supports the SDF’s objectives of spatial integration, social inclusion and efficient infrastructure investment.

4.2. Desirability

4.2.1. Topography

Most of the terrain slopes in a south-easterly and north-westerly direction, converging towards a low-lying area that traverses the site. The site’s topography ranges from 1:4, occurring only in a small section, to 1:80 with most of the area featuring a slope around 1:10.

4.2.2. Soil Conditions

The soil conditions of the site were analysed by Terra Geotechnical. The following conclusions were reached in a report dd. 08/06/2025 of which the following extract is hereby quoted:

- “Site Description:
The proposed development area is moderately sloped and located on the south eastern side of a local ridge. It lies south east of the Monte Christo Eco Estate and is underlain by Cretaceous-aged Hartenbos Formation sediments, including transported sandy, silty, and clayey materials.”
- “Geotechnical Conditions:
The site is generally covered with a consistent profile of transported soils with moderate clay content. No groundwater seepage or rock outcrops were observed during fieldwork though seasonal perched water tables are possible.”
- “Soil Properties:
 - Soils display low plasticity and are classified as CL (low plasticity clay) and GC (clayey gravel with sand).
 - Cohesive soils exhibit moderate compressibility and settlement potential, especially when saturated.
 - Laboratory tests indicate poor strength under soaked conditions, with CBR values of 1-5 (worse than G9 classification)
 - Heaved potential is generally low but not negligible.”
- “Excavatability and Stability:
 - Excavation is rated as Soft, generally achievable with standard TLB equipment.
 - No significant slope stability concerns were identified due to the site’s gentle gradient.”
- “Foundation Suitability:
 - The upper 1.0 m of in-situ soil is unstable for shallow foundations in its natural state due to its proclivity to undergo changes in its shear strength characteristics upon wetting.”
- “Recommendations include:
 - Stiffened/Cellular rafts or
 - Soil raft systems (removal and replacement with compacted inert fill) or
 - Deep strip foundations with properly prepared subgrade.”

“Safe bearing capacity of up to 100kPa (reduced if saturated) is possible in deeper, stable strata.”

- “Subgrade and Pavement Recommendations:
Due to the moisture-sensitive soils, imported materials (e.g., G5-G7) are recommended for road subgrades and layer works. A layered flexible pavement system with proper compaction and drainage is advised.”
- “Drainage and Earthworks:
Effective surface and sub-surface drainage are essential to mitigate moisture-related soil strength loss. Earthworks must adhere to SABS 1200 standards, with attention to vegetation removal, proper compaction, and backfill practices.”

“Conclusions and Recommendations.

The site is considered suitable for development, subject to the implementation of specific geotechnical precautions. Foundation systems must be carefully designed to address the potential of settlement and the moisture sensitivity of the underlying soils. The use of imported structural fill and the incorporation of well-engineered drainage solutions will be critical to achieving long-term performance and stability.”

“It is strongly recommended that a more detailed, design-level geotechnical investigation be undertaken at the location of each proposed structure once their exact footprints and load requirements are defined. This will allow for tailored foundation design and mitigation strategies specific to site conditions.”

4.2.3. Vegetation

There is no vegetation on the subject of this application as it is being used for agricultural cultivation purposes. Therefore, the challenge of conserving sensitive vegetation is not a consideration.

4.2.4. Flood Lines

There is a natural drainage course traversing the land concerned. The run-off thereof, however, is limited due to its small catchment area and a storage dam upstream which makes it well-suited for crop cultivation without requiring drainage interventions. The run-off is in fact so limited that the area is used for crop growing purposes. Therefore, flood lines are not a consideration. It should, however, be mentioned that the proposed land uses and the alignment of roads are planned in such a manner that the natural drainage areas will have no effect as will be discussed in this report.

4.2.5. Sensitivities

No sensitivities such as slopes in excess of 1:4, unstable soil conditions, problematic land conditions, vegetation, geological or negative characteristics which may pose potentially hazardous impacts are present on the land forming part of this application. Therefore, the potential sensitivity of the terrain for development purposes is not a consideration.

4.2.6. Water Table

During wet conditions there may be minor drainage issues in the natural drainage course, but according to the long-standing owner of this property, the land unit has never experienced any water-related issues in its use for agricultural purposes. Furthermore, potential ground water issues are expected only within the low-lying drainage area, where the proposed land uses have been planned specifically to avoid sensitivity to wet conditions by designating it to land uses not affected by wet conditions.

4.2.7. Drainage Pattern

According to a stormwater analysis carried out by Element Consulting Engineers “the proposed development spans over a number of watersheds and a number of drainage zones are identified. Each zone will be serviced by a formalised stormwater drainage network. The primary drainage zone drains towards the most southern corner of the site adjacent to the R102 (MR344) and is indicated diagrammatically in the figure below” – the diagram refers to the subject of this application.

“For the primary drainage area, stormwater will be collected in a detention pond on the lowest point of the site on the southern corner. Stormwater will drain south-west in a dedicated concrete culvert, underneath the Monte Christo Road, where it will drain into the existing municipal pond on the municipal erf (Ptn. 101 of Farm 217). Drainage from the municipal detention pond is into the Hartenbos River.”

4.2.8. Filling and Excavation

There are no signs of any filling or excavation that took place on this terrain apart from two retention ponds which were built for controlling storm water run-off.

4.2.9. Carrying Capacity

Presently the site is zoned for Agriculture Zone I purposes. According to the analysis of the potential thereof by SoilZa for crop production it was found to be high. Therefore, it can be concluded that the carrying capacity of this land unit for agricultural purposes is high, but this matter in comparison with other land use options will be discussed in more detail in par.4.5.1.

While the agricultural carrying capacity of land with high potential is significant, the strategic development of social facilities such as a hospital, school and university on the periphery of an urban area, like the case of Rem. Farm 219, often yields greater long-term benefits for the community. The provision of essential healthcare and educational infrastructure directly supports population growth enhances social well-being and drives economic development in ways that agriculture alone cannot achieve. In this context, the carrying capacity assessment should prioritise the ability of the land to accommodate these vital facilities, particularly where urban expansion is anticipated. By aligning land uses with the broader socio-economic needs of the urban population, the development of social infrastructure ensures sustainable growth and maximises the public value of the land resource.

From a sustainability and long-term planning perspective, the proposed development represents a logical progression of land use on land situated directly next to the urban edge which has been identified in Par. 5.3.1 of the Mossel Bay Spatial Development Framework as “the foreseeable expansion in a possible future scenario”. The unforeseen pace residential growth that has taken place since the 2022 amendment of the MSDF, coupled with the absence of essential social facilities, has converted what once a possible long-term expansion scenario into an immediate and unavoidable planning imperative, when guided by responsible planning and management, urban development can in fact achieve a stronger alignment with sustainable principles than traditional agricultural practices, particularly in terms of efficient land use, service delivery and the reduction of environmental impacts through compact development. This consideration is further supported by the fact that the Remainder Farm No. 219 has, as already mentioned, been identified as an area earmarked for future expansion, confirming the appropriateness of the proposed land use change in this location.

4.2.10 Preferred Location

4.2.10.1 General

In identifying an optimal location for the establishment of a consolidated node of social facilities, priority is given to sites offering high levels of accessibility from multiple directions, thereby ensuring equitable reach for a broader community. Land must be of sufficient size to accommodate

complimentary facilities such as a hospital, school and tertiary institution within a single integrated precinct. The preferred site should be free from environmental constraints that would inhibit development, while being located in proximity to existing or planned infrastructure networks to ensure cost-effective service provision. Furthermore, the location should support principles of spatial justice and efficiency by serving both existing urban areas, future growth nodes as well as the agricultural hinterland, reducing travel distances and promoting functional integration of services. This analysis is based on the premise that a cluster of social facilities, comprising a hospital, school and tertiary institution, is more effective in meeting community needs than establishing any one of these individually. Throughout this report this aspect is considered in relation to the spatial rationale and land use implications of the proposal

Basically the following three potential areas within the Greater Mossel Bay are identified to be investigated to determine their compliance with the following criteria for establishing a node of social facilities that will best serve the community not only in the short-term, but especially in the long-term:

4.2.10.1.1 Accessibility: Requirements:

- Located near major nodes or transport corridors.
 - Reachable from multiple directions without relying on a single access road
- **Dana Bay Area:**
Dana Bay is accessible via a single route, namely Flora Road, making it susceptible to traffic congestion, moreover, its proximity to the existing Bayview Clinic as well as the Point High School diminishes similar facilities in this location.

Although provision has been made for a future secondary access connecting to the N2 at the Herbetsdale turn –off, it is unlikely to function as the preferred route into town, since it would constitute a detour and offer less direct accessibility compared to the existing primary access.

Although it falls within the urban edge the above mentioned constraints do not justify the establishment of a node of social facilities at this location. This reality is reinforced by the fact that the rural hinterland of Dana Bay is sparsely populated, which raises concerns about the long-term viability and efficient utilisation of the proposed cluster of social facilities.

Furthermore, it should be mentioned that the establishment of a node of social facilities in Dana Bay is unlikely to function optimally, given that key facilities such as Punt High School and the Bayview Clinic are already relatively easily accessible from this area via the upper section of Louis Fourie Road, which is not subject to the same levels of congestion as experienced elsewhere on this route.

Based on the above analysis of the criteria, it is clear that the Dana Bay area fails to meet the requirements in terms of accessibility for the establishment of such a cluster of social facilities.

The recent fire in Dana Bay, during which the sole access route, viz. Flora Road, was closed, provides a clear and practical demonstration of how such an eventuality potentially serve consequences that may follow. Both the Dana Bay and Aalwyndal areas remain exposed to this vulnerability due to their dependence on single-access road systems.

- **Aalwyndal Area:**
Similar to Dana Bay, the Aalwyndal area is also dependent on a single access route. From a traffic perspective, its situation is even more constrained as this route, viz. Aalwyndal Road, connects to the town via a busy intersection with the N2 and Louis Fourie Road at the busy Langeberg Mall entrance – an area where congestion is expected to intensify as the town continues to grow. Although provision has been made in the traffic master plan for a secondary access from Dana Bay via the N2 at the Herbetsdale turn-off, as well as for a future connection from Aalwyndal to the N2, neither of these routes is likely to become the preferred access to town, since both would constitute detours which do not offer any greater efficiency or convenience from any direction than the current route.

Areas that are served by only a single entrance and access route are inherently at risk of becoming inaccessible, whether for entry or exit. This poses a significant constraint for any development, but it is particularly critical in the case of a social facility such as a hospital where uninterrupted access is an unavoidable operational prerequisite.

As experienced in Dana Bay, where fires caused significant discomfort and access problems for residents, a similar scenario has unfolded during the recent fires in Aalwyndal. This area is also served by only a single escape route, namely Aalwyn Way. The potential catastrophic implications of such circumstances for any social facility, particularly a hospital, require no further elaboration.

The risk is further exacerbated by the findings and recommendations of the recent sensitivity study, which proposed a fragmented residential development pattern interspersed by conserved portions of fynbos. While conservation of fynbos is essential, its ecological management requires periodic burning to maintain its integrity. The consequences for adjoining residential areas and especially a hospital and the associated fire risk and access constraints, are self-evident.

As discussed in this report, the planning and implementation of future alternative access routes to these areas constitute long-term projects, subject to extensive processes of feasibility testing, budgeting, engineering design, land acquisition, statutory approval and ultimately construction thereof. Notwithstanding these realities, the provision of reliable alternative access remains one of the most important requirements for the development of a social facility of this nature to operate optimally and efficiently. Without such access, neither public safety nor the continuity of essential services can be guaranteed.

It should also be pointed out that both the Dana Bay and Aalwyndal areas contain a variety of vegetation types including indigenous species that require periodic burning as part of their natural ecological cycle and that are, by nature, highly flammable. Consequently, these areas will always be exposed to an inherent fire hazard, which in turn may compromise the safety and reliability of their access roads in future.

In addition to the access constraints caused by a fire along a sole access route, the resulting smoke presents a significant health risk, particularly for hospital patients who are especially vulnerable to respiratory irritation and reduced air quality.

Although Aalwyndal comprises a large area with potential for substantial future residential development, it does not serve a wide rural hinterland or a cluster of smaller urban settlements. Its role is therefore primarily local in nature and in close proximity to the existing Bayview Clinic and Point High School, without the regional significance required to justify the establishment of a comprehensive node of social facilities such as a hospital, school and university. From a spatial planning perspective, the absence of a broader catchment area limits the efficiency and sustainability of locating such higher-order facilities in Aalwyndal.

Furthermore, it should be emphasised that the recent sensitivity study for Aalwyndal has resulted in approximately half of the land originally identified for development in the Precinct Plan being withdrawn. This significant reduction not only limits the potential catchment area for essential social facilities, but also constrains the implementation of the Roads Master Plan intended to establish vital linkages between Aalwyndal and higher-order routes. Given the botanical and topographical constraints affecting this process the realisation of such a connection has become an extra long-term prospect. In contrast, the need for the three proposed facilities, particularly healthcare, is immediate and critical to meet current community demands. Contrary to the situation in Aalwyndal, the location identified for the proposed development, as provided for in this application, not only complies fully with the stringent accessibility requirements, but is also immediately available upon approval of this application.

- **Remainder Farm No. 219 (Hartland Area):**

The area where the cluster of social facilities is proposed, viz. a portion of Remainder Farm Vaale Valley No. 219, is strategically located directly adjacent to transport routes: the N2, the

primary corridor between Cape Town and Gqeberha and the R102, which not only links smaller coastal settlements between Mossel Bay and Glentana, but also the adjacent rural area with its farming communities and Friemersheim as well as the Brandwag hinterland. Unlike other sites previously discussed, this area already excels in accessibility, directly adjoining two major through-routes rather than limited dead-end roads.

Therefore, this area complies with the stringent requirement of being reachable from multiple directions without relying on a single access road as it enjoys excellent accessibility from nearly all directions. It is due to its proximity to major routes, which connect the entire Garden Route, as well as smaller coastal and other settlements as well as farming communities in the hinterland that rely on various minor roads linking to these main routes.

In contrast with the two other alternative sites for the establishment of, especially an emergency social facility like a hospital, the proposed site for a hospital on a portion of Remainder Farm 219, benefits from exceptionally high accessibility due to its direct connection to high-order traffic routes in both directions. This ensures reliable access and egress under all conditions, thereby eliminating the risk typically associated with developments served by a single entrance route. Furthermore, the immediate surroundings of the site do not contain highly flammable vegetation and no natural features exist that could pose a fire hazard or obstruct traffic flow. As such, the free and uninterrupted movement of vehicles to and from the hospital can be assured at all times.

4.2.10.1.2 Land Size and Configuration Requirements:

- Sufficient area to cluster a hospital, school and tertiary facility
- Shape and topography suitable for integrated site planning
- Dana Bay Area:
There are privately owned properties in Dana Bay which offer sufficient area to cluster a hospital, school and tertiary institution of which the shape and topography are suitable for integrated site planning.

Although there are privately owned properties in Dana Bay with suitable size and topography for the proposed development, their location, relative to where the real and pressing need exists, renders them unsuitable. Moreover, private ownership does not necessarily translate into land availability for public orientated facilities, as such properties are subject to individual interests and market dynamics. The lack of Municipal land in this area big enough to accommodate the proposed development further restricts the possibility of implementing it here.

- Aalwyndal Area:
Depending on the available land, whether on the plateau which offers extensive flat areas, but may face ecological constraints, or in the lower-lying areas, where both topographical and ecological factors could pose challenges, it can be argued that a portion of this area may still meet some of the requirements, but not all of them as discussed in this report.
- Remainder Farm No. 219 (Hartland Area):
As shown on the attached Plan No. HB/C/211-2 and the Site Development Plan the Remainder Farm No. 219 offers ample space for the proposed development which is topographically suitable for this purpose. The shape of the subject of this application is well suited for the integrated planning of the three proposed land uses, allowing all to be positioned along the R102 for optimal exposure and accessibility.

Therefore, this area complies ALL with the requirements in terms of size, shape and topographical suitability thereof for the proposed development.

4.2.10.1.3 Environmental Suitability Requirements:

- Minimal sensitive vegetation or heritage constraints; and
- Outside high-risk flood zones or unstable land areas.

- Dana Bay Area:
Although the sites in this area may be large enough to accommodate the proposed development and are located outside high-risk flood zoned and unstable land, they are affected by sensitive vegetation. It is, however, not yet known whether heritage constraints apply.

- Aalwyndal Area:
Few sites within the Aalwyndal area are of adequate size to accommodate the proposed cluster of social facilities. The extent to which these sites are viable is, however, subject to their availability, as many are constrained by environmental sensitivities identified in the latest study, as well as by topographical challenges.
With regard to high-risk flood zones and areas of unstable land, it is not readily possible to access these potential constraints at this stage, as such evaluation depends on the availability of a specific site as well as access to reliable information on these matters.

- Remainder Farm No. 219 (Hartland Area):
This site is currently utilised for crop production and is therefore not subject to sensitive vegetation or heritage constraints. A low-lying drainage area traverses the site, however, given the relatively limited stormwater run-off, as discussed in this report, it cannot be classified as a high-risk flood zone. Furthermore, according to a soil analysis conducted by Terra Geotechnical, no areas of unstable land are present.

4.2.10.2 Secondary School

During the initial consultations with the Municipality regarding the establishment of a core of social facilities, such as a school, hospital and university, a request was to identify land parcels within the existing urban edge that would be both sufficiently large and suitably located to accommodate the proposed institutional uses. At that stage, the Municipality indicated that no such sites meeting these requirements were available.

However, during a more recent engagement, the Municipality pointed out that there are even within the urban edge that are zoned for educational purposes. While this may be factually correct, it must be noted that appropriate zoning in itself does not automatically render a site suitable for the intended development. The proposed core of facilities requires a site of adequate extent to accommodate all three components, namely, the school, hospital and university, which, when developed in a consolidated manner and also close to a regional shopping centre, will operate in a mutually reinforcing way and yield for greater functional and socio-economic benefits than any single facility located in isolation on a site of which the only benefit is that of being available as discussed in this report.

Furthermore, the locational suitability of such a core is of equal importance. The selected site must correspond not only with areas where there is an existing and demonstrable need, but also with the long-term spatial growth direction of the Greater Mossel Bay functional area and its agricultural hinterland, as reflected in the Mossel Bay and Garden Route District Municipality Spatial Development Frameworks.

It is therefore evident that merely identifying a site within the urban edge that happens to have an appropriate zoning, yet lacks the necessary extent and strategic locational qualities, would be counterproductive and inconsistent with sound spatial planning principles. In essence, such an approach would be akin to proposing the construction of an ice factory in the South Pole, technically permissible, yet entirely impractical and without merit in terms of spatial logic and need.

Each of the sites listed by the Municipality was carefully evaluated against key criteria discussed above, namely, adequate size, good accessibility, appropriate location and alignment with identified needs. None of the available erven were found to be suitable in terms of all these criteria for the intended purpose.

By way of illustration, the total size of the sites now proposed for the development to accommodate the three integrated social facilities comprises approximate 26.8ha. This is the minimum extent required to allow for the efficient functioning of the proposed hospital, secondary school and university as a consolidated core. In contrast, the largest property on the Municipal list, viz. Erf 7089 in Dana Bay, measures only ± 10 ha and is situated on the opposite side of Mossel Bay. Apart from its limited size, the location of this erf is inconsistent with the identified area of need and with the long-term growth direction of the Greater Mossel Bay region.

The second largest site, Erf 2420 in Hartenbos, situated next to the busy Louis Fourie Road, extends to approximately 8.8ha and is currently utilised as a driving range. In addition, a substantial centrally located portion of this property lies within a natural depression, further constraining its suitability for large-scale institutional development. The remaining erven on the list are significantly smaller and predominantly located within the Dana Bay and Kwanonqaba areas, which, for reasons already outlined are also unsuitable to accommodate the proposed development.

To illustrate the practical reality of just one of the key criteria, viz. size, it should be pointed out that the secondary school component alone requires an area of approximately 12.6ha to accommodate the necessary buildings, sports fields, hostel and ancillary infrastructure. Importantly, the location of this facility in close proximity to the soon-to-be-constructed primary school within the Hartland Lifestyle Estate, approximately 80m away, is regarded as non-negotiable. This proximity is fundamental, as the proposed secondary school is intended to serve as the natural and logical educational extension of the primary school, thereby ensuring a continuous and integrated learning environment. Furthermore, learners of the primary school will also benefit from shared access to the extensive sports facilities to be developed as part of the proposed secondary school, thereby enhancing the overall utilisation and efficiency of educational infrastructure within the area.

Such spatial integration will not only enhance educational progression and institutional efficiency, but will also significantly improve safety and convenience for learners, particularly those residing in Hartland Lifestyle Estate, New Vintage, Monte Christo, Outeniquasbosch, Hartenbos Landgoed and the surrounding area. Moreover, the co-location of these educational facilities will contribute to a reduction in daily vehicular traffic, thereby supporting sustainable transport and mobility planning objectives.

The strategic location of the secondary school in immediate proximity to the primary school also plays a crucial role in strengthening the broader core of social facilities envisaged for the area. When developed in conjunction with the proposed hospital and university, the three facilities will create a well-balanced, multi-functional institutional node that serves both educational and health needs of the wider community. This integrated approach aligns with the principles of Spatial Efficiency, accessibility and functional clustering promoted by the Western Cape Provincial and Mossel Bay Municipal Spatial Development Frameworks.

Such a spatially concentrated node will not only optimise the use of available infrastructure, but will also foster sustainable urban structure where social facilities in combination with the nearby regional shopping centre support and reinforce one another. The result will be a highly accessible and efficient hub that enhances service delivery, stimulates local economic activity and contributes to the long-term spatial and socio economic development objectives of the Greater Mossel Bay region.

A detailed discussion of each erf included in the Municipal list, along with the outcome of the assessment undertaken, is available for inspection upon request.

Therefore, from the above evaluation it is evident that none of the alternative sites identified by the Municipality are capable of accommodating the proposed combination of social facilities in a manner that is spatially efficient, functional and consistent with long-term development objectives. The physical constraints, insufficient size and locational disadvantages of the listed erven render them unsuitable for the intended integrated institutional use.

In contrast, the site presently forming the subject of this application not only meets the minimum requirements, but it is also ideally situated relative to existing and future demand patterns, accessibility routes and the growth trajectory of the Greater Mossel Bay functional area. The selection of this site, therefore, represents the only practical and spatially justified option to achieve the intended development outcomes in accordance with the principles of sound planning, need and desirability as contemplated in Section 42.(1)(b) of SPLUMA.

4.2.10.3 CONCLUSION:

Based on the above rationalisation, it is evident that the proposed development on Remainder Farm 219 fully complies with all the criteria for the establishment of an integrated node of social facilities. In contrast, other identified areas meet only some of these requirements and therefore cannot effectively respond to the broader community needs of Mossel Bay. The proposed site represents the most appropriate, accessible and sustainable location for such a development, fully consistent with the spatial planning principles and objectives of the Mossel Bay Spatial Development Framework (MSDF) as well as the Western Cape Provincial Spatial Development Framework (WCSDF) both of which promote the efficient use of land, equitable access to social services and the strengthening of existing and future urban nodes. Given the immediate need for these facilities, particularly healthcare, the timely approval and implementation of this development will provide significant and tangible benefits to the Mossel Bay community.

4.3. Existing Planning and Legislation.

4.3.1. Spatial Planning and Land Use Management Act, 2013, (S.P.L.U.M.A)

4.3.1.1. Spatial Justice

- **Past spatial and other development imbalances must be readdressed through improved access to and use of land.**

The proposed development does not involve any form of land use which can facilitate the redressing of development imbalances of the past as it is aimed at redressing the lack of social facilities for all spheres of the community which are meant to be provided for by the central and provincial authorities. The proposed development will in fact bring these proposed facilities closer to, inter alia, the community of Sonskynvallei and Power Town, which are respectively 11km (23 minutes driving distance) and 15.5km (22 minutes) away from the Bay View Clinic, while the proposed medical facility will only be approx. 3.0km and 5.5km away from these neighbourhoods. It will be in close proximity to Hartenbos, Monte Christo, Outeniquas Bosch, Hartenbos Landgoed as well as the approved, and soon to be developed, Mystic Views and New Vintage. These neighbourhoods are served by higher-order roads that provide convenient access to all proposed social facilities, in contrast to the over-congested Louis Fourie Road, which serves similar facilities, but in different places in town. The current upgrading of this route can merely be regarded as a temporary measure, given the town's rapid growth and physical constraints of its narrow, linear urban form. This limitation restricts the creation of additional arterial routes to serve the entire urban area dependant on the existing social facilities, thereby reinforcing the strategic importance of providing such facilities in more accessible locations such as the application area. The establishment and support of a core of social facilities within this area, facilities that are not dependant on Louis Fourie Road as their primary access, will significantly contribute to alleviating the generation of additional traffic on this already congested corridor. By decentralising social services and improving their proximity to rapidly growing residential areas, the proposal promotes a more balanced spatial structure, reduces unnecessary travel demand and enhances overall accessibility. This approach is fully consistent with the principle of sustainable urban development and the strategic intensions of the MSDF.

- **Spatial development frameworks and policies at all spheres of government must address the inclusion of persons and areas that were previously excluded, with an emphasis on informal settlements, former homeland areas characterises by widespread poverty and deprivation.**

Spatial development frameworks and policies of all spheres of government do have an indirect impact on the inclusion of communities who were previously excluded from processes as the availability and access to medical and educational facilities are indispensable for all spheres of the community, with special reference to those who are the most vulnerable. It is essential that authorities have the requisite understanding to facilitate the successful implementation of the proposed facilities.

- **Spatial Planning mechanisms, including land use schemes, must incorporate provisions that enable redress in access to land by disadvantaged communities and persons.**

Spatial Planning mechanisms providing opportunities to previously disadvantaged individuals are directly related to this application as it aims to provide basic social facilities on land which is situated outside the Urban Edge, but easily accessible to a wide spectrum of the community it is meant to serve. Therefore, when evaluating the merits of this application for development outside the urban edge the authorities are requested to consider the site - specific circumstances that justify a departure from the Municipal Spatial Development Framework as provided for in Section 22 (2) of S.P.L.U.M.A. as follows: "Subject to Section 42, Municipal Planning Tribunal or any other authority required or mandated to make a land development decision may depart from the provisions of a municipal spatial development framework only if site-specific circumstances justify a departure from the provisions of such municipal spatial development framework." These contextual realities should be acknowledged and integrated into the Spatial Planning mechanisms. This process will promote efficient and sustainable development and contribute to the establishment of a desirable spatial structure.

- **Land use management systems must include all areas of a Municipality and specifically include provisions that are flexible and appropriate for the management of disadvantaged areas, informal settlements and former homeland areas.**

There are no former homeland areas in the vicinity, but Power Town, approx. 2.2 km away from the proposed hospital site, can be classified as an informal settlement and Sonskynvallei, to a lesser extent, as a disadvantaged area. The rest of the developments abutting Remainder Farm 219 or which are situated in the surrounding area do not fall within these categories, but still form part of a community where the facilities, especially a hospital, are in demand.

In order to comply with this principle in S.P.L.U.M.A. there needs to be:

- **Inclusivity in Land Use Planning**
The proposed development of a hospital, school and university directly supports the principle that land use management systems must be inclusive of all areas within the municipality, including historically disadvantaged or underdeveloped zones. This ensures that basic services such as healthcare and education are equitably distributed, rather than concentrated in established and affluent areas.
- **Flexibility and Responsiveness**
Although the proposed development can be considered as peri-urban it abuts a well-integrated urban expansion plan with full bulk infrastructure and services, lying within the urban edge where rapid change from rural to urban functions is taking place. Such an area often faces unique spatial, economic and infrastructural constraints. The proposed development is designed to be flexible in terms of community needs in the area and further a wide, infrastructure availability and socio-economic realities.
- **Addressing Service Backlogs and Equity**
The proposed development directly addresses service delivery backlogs created by the exclusively residential developments by providing critical social facilities where they are most needed. This aligns with Spatial Justice objectives and will improve the livelihood prospects of the local population. Access to or local school, hospital and university reduces travel cost and time, thereby contributing to improved quality of life and economic participation.

- **Alignment with Integrated Development Plans (IDP's) and Spatial Development Frameworks (SDF's)**
The projects are aimed at supporting the goals of the municipality's IDP's and SDF, which call for the integration of communities into the urban fabric through investment in social infrastructure.
- **Support for Broader Municipal Goals**
Health.
Reducing preventable deceases through better access to healthcare
Education.
Enabling youth development and long term economic upliftment.
Safety and Stability.
Hospitals, schools and universities act as anchors for safe and thriving communities.

Conclusion

By developing a hospital, school and university in an area where these facilities are lacking, the private developer is fulfilling an obligation which is normally the responsibility of the provincial and/or central government to create a flexible and inclusive land use system. Such development not only adheres to regulatory and Spatial Planning mandates, but it also promotes equity, dignity and opportunity for a population where these facilities are not available.

- **Land development procedures must include provision that accommodate access to secure tenure and the incremental upgrading of informal areas.**
This principle is not applicable as it relates to access to secure tenure and the incremental upgrading of informal areas, while this application is aimed at the provision of social facilities for which there are a need due to rapid residential development that took place in this part of the Greater Mossel Bay. Residential development which will take place is the provision of accommodation for the medical staff working at the hospital as well as a residence for the scholars of the secondary school who come from somewhere else.
- **A Municipal Planning Tribunal considering an application before it, may not be implemented or restricted in the exercise of its discretion solely on the ground that the value of land or property is affected by the outcome of the application.**
This principal is not applicable as this application is not aimed at speculating with the land concerned, but to provide in the need for basic social services.

4.3.1.2. Principal of Spatial Sustainability

- **Promote land development that is within the fiscal, institutional and administrative means of the Republic.**
The proposed development will be undertaken with private funding and therefore the fiscal, institutional and administrative capacity of government bodies are not relevant.
- **Ensure that special consideration is given to the protection of prime and unique agricultural land.**
According to a study conducted by Soil ZA, of which a copy is hereby attached as Annexure 14, it was found that the potential of the terrain for the production of crops is high. The study, however, concluded that "the acceptable and ultimate approval of the development cannot be based purely on its agricultural impact, but requires the weighing of many diverse factors, which include the high demand for development space within Mossel Bay and the fact that this area is designated for foreseeable future expansion in the Mossel Bay Spatial Development Framework."
As pointed out by Soil ZA "such a weighing is far beyond the scope of an agricultural impact assessment, which cannot therefore conclude on the overall acceptability of the development". The flip side of the coin, however, is discussed in par. 4.2.9 and 4.5.1 of this report in which it is concluded that the potential for the development of this land unit for the proposed

development is equally high, but with the difference that its long-term benefits outweighs the use thereof for agricultural purposes.

- **Uphold consistency of land use measures in accordance with the environmental management instruments.**

The land consists of cropland where seasonal planting takes place. Other than that there is no vegetation on it. Therefore, environmental management instruments to uphold consistency of land use measures in accordance with environmental management systems is not applicable

- **Consider all current and future costs to all parties for the provision of infrastructure and social services in land developments.**

The current and future costs for all parties involved in the provision of infrastructure for the proposed development of social services have already been taken into account before lodging this application. The developer is primarily responsible for the financing of all internal civil services and electrical bulk services and the distribution thereof to the respective land uses. The external civil bulk services, such as e.g. the construction of a regional water reservoir on the hilltop of this farm to serve also other developments within the Greater Mossel Bay was financed by the municipality, but with the proviso that each developer will make a pro rata contribution in respect of the scope of the development served. The construction of such a storage reservoir with associated infrastructure had substantial financial implications for the municipality, but thanks to the scale of the development at Hartland Lifestyle Estate as well as the proposed development which will provide in the social needs of Hartland as well as other neighbourhoods and seaside villages in the area, it justified the construction of this water storage facility. Therefore, the proposed development will in fact accelerate the recovery of the costs involved in constructing the reservoir.

- **Promote land development in locations that are sustainable and limit urban sprawl.**

The proposed development cannot be regarded as a proponent of urban sprawl as it aligns with planned growth objectives and infrastructure capacity rather than contributing to urban sprawl. The development represents a textbook case of infill development, effectively bridging the gap between, the existing residential development at Monte Christo, Outeniquasbosch and Hartland and Kleinbrak River residential areas. The fast growing Hartland Lifestyle Estate is situated directly south-east thereof between the N2 and the coast line. Therefore, this land unit is locked in on three sides by urban development, while the remaining portion thereof is situated on the inland side bordered by a high hill and sensitive conservation worthy indigenous vegetation blocking any future urban expansion in that direction. By expanding in a landward direction coastal sprawl along the sensitive shoreline is effectively curtailed in accordance with provincial policy.

Therefore, it can be concluded that the proposed development will take place on a property which is landlocked between existing development and environmental sensitivities which exclude any possibility of uncontrolled urban sprawl.

- **Result in communities that are viable.**

The proposed development complies with the following criteria in contributing to the establishment of a viable community:

- Anchoring public life and provide essential health and educational services;
- Promoting equity by serving diverse communities;
- Stimulating the local economy through job creation and service needs; and
- Encouraging long-term settlement and investment in not only this area, but the entire Greater Mossel Bay.

Furthermore, these facilities will also be:

- Accessible thanks to the high order traffic routes in the immediate proximity thereof; and
- Promoting an integrated community whereby their most basic social needs are met.

4.3.1.3 Principle of Efficiency

4.3.1.3.1. Land development optimises the use of existing resources and infrastructure.

The optimization of existing resources and infrastructure can be achieved by:

4.3.1.3.1.1. Leverage Existing Infrastructure

- **Transport Access.**
The site is accessible via existing road networks linking up therewith;
- **Utilities.**
The municipal bulk infrastructure is readily available in the close proximity to connect to existing water, sewerage and electricity where capacity allows.
- **Shared Infrastructure.**
The potential of sharing parking, open space or recreational facilities is not an option as the proposed three land uses form pockets separated by roads.

4.3.1.3.1.2. Efficient Land Use Planning

- **Compact and Multi-Functional Design**
The use of vertical construction or shared spaces (e.g. cafeteria, auditoriums, green spaces, etc.) to reduce land footprint will be partially applied due to physical site conditions and the difference in land use needs;
- **Zoning Compatibility**
Alignment of the zoning required for the proposed development with existing zoning to avoid costly rezoning or legal challenges is not readily possible as there is no land with the appropriate zoning, size and location available within the urban edge to prevent a rezoning process. The proposed development, furthermore, also requires the motivation of 'site specifics' in order to justify development outside the urban edge for the same reason why rezoning is required.
- **Decision-making procedures are designed to minimise negative financial, social, economic, or environmental impacts.**
The decision-making procedures are entirely in the hands of the municipality over which applicant has no control. Therefore, the principle will not be discussed any further in this report.
- **Development applications procedures are efficient and streamlined and timeframes are adhered to by all parties.**
The municipality is primarily responsible for efficient and streamlined procedures to ensure that timeframes are adhered to, while the applicant is obliged to comply with procedures prescribed by the Municipality.

4.3.1.4. Principal of Spatial Resilience.

This principle primarily relates to spatial plans, policies for the management of Land Use systems to ensure a sustainable way of life for communities that are vulnerable to economic and environmental setbacks. The specialised market that the proposed development caters for is indispensable in ensuring a sustainable way of life for not only communities that are vulnerable to economic and environmental setbacks, but also to the full spectrum of community life. Therefore, it would be appropriate if the Spatial Development Framework will in future accommodate the proposed development based on the 'site - specifics' related to this application as provided for in Section 22 (2) of SPLUMA.

For the purpose of achieving spatial resilience when planning for a hospital and educational institutions the following site layout and zoning flexibility principles apply:

- Separate yet connected zones by placing each land use in distinct zones, but with shared, accessible interfaces as shown on the Site Development Plan.

- The development proposal provides for internal buffer spaces between the different functions of each of the proposed land uses in the form of open spaces, green belts and walkways.
- Land is reserved for future expansion without disrupting the other.

Attention will be paid to the redundancy in critical infrastructure:

- Provision is made for multiple access roads where necessary to ensure there are multiple entry/exit points in case of road blockages or emergencies.
- Backup utilities will be provided in the form of independent water, power and communication systems that can function if one fails.

The following principles to integrate with the environment will be followed:

- Planning is done around natural slopes to prevent flooding and endure drainage resilience by using these areas for grassed sport fields and landscaping purposes.
- Green infrastructure will be used where possible by applying bioswales, permeable paving and tree canopies to manage stormwater.

4.3.1.5. Principal of good Administration

- **All spheres of government ensure an integrated approach to land use and land development that is guided by the spatial planning and land use management systems as embodied in this Act.**

The assurance that an integral approach is followed by all spheres of government with respect to land use development in terms of the spatial planning and land use management systems without creating unnecessary stumbling blocks for the developer, as embodied in the Act, rests solely with the authorities dealing with the application. Therefore, the applicant has no control over this part of the process.

- **Policies, legislation and procedures must be clearly set in order to inform and empower members of the public.**

Procedures for this development application will be adhered to as prescribed, while a public participation process if applicable, will commence once the applicant is instructed to start with this process.

4.3.2. LAND USE PLANNING ACT, 2014, (LUPA).

As far as the proposed development is concerned, there is a great deal of duplication amongst the principles of spatial justice, good administration and resilience that are pursued under this legislation, but which have already been discussed in par 4.3.1. Therefore, these principles will not be discussed again.

4.3.3. PROVINCIAL SPATIAL DEVELOPMENT FRAMEWORK (P.S.D.F)

Objectives:

4.3.3.1 Sustainable Development:

The establishment of a core of social facilities comprising a hospital, school and university directly adjacent to the area earmarked for significant urban expansion, but located outside the current urban edge, as in the case of the subject of this application, can be achieved in a sustainable and policy-aligned manner. This proposal supports the principles of the Municipal Spatial Development Framework (MSDF), which promote integrated, compact and resource-efficient settlement patterns. The development will function as a transitional node between the urban and adjacent rural environment of the Remainder Farm No. 219 which is earmarked for future expansion without resulting in leapfrog development.

By clustering the proposed facilities and enabling the shared use of infrastructure and services, both environmental and economic efficiency will be realised. Sustainability will further be enhanced through the incorporation of green infrastructure measures such as on-site stormwater attenuation, renewable energy generation and landscape buffering to protect the natural drainage corridors on site. The location of these facilities will improve equitable access to essential education and healthcare services for the broader community, addressing an existing service deficit within a growing population catchment. When implemented in a phased consistent with the pace of surrounding urban development, based on site-specifics, the proposal will act as a strategic catalyst for orderly, inclusive and sustainable growth, while supporting the long-term vision for future incorporation within the urban edge.

4.3.3.2 Economic Growth and Opportunity:

The proposed development of a hospital, school and university in land adjacent to existing neighbourhoods within the urban edge supports the Western Cape Spatial Development Framework's (WCPSDF) goals of spatial efficiency, inclusive growth and sustainable economic development. Although located just outside the urban edge, the site's proximity to established infrastructure and population catchments ensures functional integration with the urban system. The facilities will act as regional economic catalyst by generating employment, stimulating secondary investment and enhancing human capital development through education and healthcare services. The proposal promotes local empowerment and enterprise development in surrounding communities, while advancing the province's transition towards a knowledge-based economy. It further supports the WCPSDF themes of productive landscapes and regional accessibility by creating a strategically positioned, high-value social and economic service node that benefits both urban and rural populations.

4.3.3.3 Social equity:

The proposed development of a hospital, school and university on land directly adjacent to existing neighbourhoods within the urban edge, but situated outside, aligns strongly with the social equity principles of the WCPSDF. The proposal promotes spatial justice by improving equitable access to essential health and education facilities for both the urban population and surrounding rural communities. Through the clustering of these social services in close proximity to established residential areas like Hartland Lifestyle Estate, Monte Christo, Outeniquasbosch and Hartenbos Landgoed, the development will contribute to the creation of an inclusive, accessible and integrated social node that enhances quality of life and community well-being.

The project directly supports human development and empowerment by providing opportunities for education healthcare and employment which are core elements of social upliftment identified in the WCPSDF. Furthermore, by situating these facilities at the interface between urban and rural areas, the development strengthens rural-urban linkages and ensures that the benefits of growth are more evenly distributed across socio-economic groups. In this way, the proposal gives practical effect to the WCPSDF's objectives of redressing historical inequities, promoting inclusivity and advancing social resilience.

4.3.3.4 Efficient Land Use and Densification:

The proposed three social facilities adjacent to existing neighbourhoods within the urban edge align with the WCPSDF's objective of promoting efficient land use and responsible densification. Although located just outside the urban edge, the site's immediate proximity to established settlements and infrastructure ensures functional integration with the urban fabric. By clustering high-order social facilities in a single, accessible node as now applied for, the development supports compact urban form and limits unnecessary land consumption. This approach optimises the use of public and private infrastructure, while concentrating employment, education and health services within a confined footprint. Overall, the proposal represents a logical, sustainable and spatially efficient extension that accommodates critical social infrastructure for both current and future populations.

4.3.3.5 Infrastructure and Transport:

- Infrastructure objectives in relation to proposed node:

The proposed hospital, school and university, located just outside the urban edge, but adjacent to existing neighbourhoods, aligns with WCPSDF's objectives by promoting sustainable and efficient land use. The development will provide essential social services to both current and future residents, while integrating seamlessly with existing infrastructure. This strategic expansion supports orderly growth, social integration and the long-term development of Mossel Bay and the Southern Cape region.

- Transport objectives in relation to proposed node:

In addressing the transport-related objectives of the WCPSDF, the proposed development of a social facilities node comprising of a hospital, secondary school and university directly supports the framework's intention to promote integrated efficient and accessible mobility systems within the Province.

The WCPSDF places strong emphasis on:

- Optimising accessibility and connectivity;
- Reducing travel distances and times;
- Enhancing transport efficiency through spatial integration; and
- Locating high intensity activities along existing or planned higher-order routes to support public transport viability and reduce congestion elsewhere.

Alignment with High-Order Transport Routes:

The proposed site's location abutting and in close proximity to the high-order traffic routes, viz. the N2 and the R102, is entirely consistent with these objectives. Such positioning enables:

- Direct accessibility on local residential and commercial streets; and
- Improved public transport integration for students, patients, staff and visitors.

This spatial relationship not only facilitates safe and efficient movement of people and goods, but also minimises the need for costly new infrastructure and reduces vehicle emissions through shorter, more direct trips.

Addressing Inefficiencies of Existing Facility Locations:

In contrast, the existing hospital and educational facilities within the urban edge are located in urban sectors that are accessible only via over-congested local and collector roads. These facilities therefore contribute to:

- Increased travel times and fuel costs;
- Compromised emergency response efficiency; and
- Traffic bottlenecks during peak commuting hours.

By relocating or introducing complimentary new facilities within this strategically positioned node, the development alleviates pressure on overburden road networks and promotes a more balanced spatial distribution of essential services – a key WCPSDF goal.

Contribution to a Substantial and Integrated Transport Network:

The clustering of the three major social facilities within one node in the close proximity of a regional shopping centre also promotes:

- Trip chaining (allowing multiple purposes to be achieved per journey);
- Shared parking and access infrastructure; and
- Enhanced public transport demand density, which makes scheduled services more viable.

This model aligns with the WCSDF's vision of developing functional, multimodal transport corridors supported by compact, accessible nodes that reduce car dependence and encourage sustainable mobility patterns.

Conclusion:

In essence, the proposed node's strategic location along the high-order routes exemplifies the transport and accessibility principles of the WCSDF by ensuring:

- Efficient land use;
- Reduced traffic congestion elsewhere;
- Equitable access to social services; and
- Long-term sustainability of the regional transport system.

This integrated approach to transport and land use planning positions the development as a model of provincial spatial efficiency and public service accessibility, directly advancing the WCSDF's spatial and infrastructural objectives.

4.3.3.6 Environmental Protection and Resource Management:

In addressing the WCPSTDF's objectives for environmental protection and resource management, it is acknowledged that the subject property lies just outside the urban edge and is presently under active agricultural use with high agricultural soils. The significance of this resource is fully recognised, however, given the site's location immediately adjacent to established urban neighbourhoods and existing municipal infrastructure, it represents part of a transitional area where long-term land use change is anticipated as urban growth pressures increase. The proposal therefore seeks to balance the protection of agricultural resources with the need to provide strategically located social infrastructure of regional importance.

The establishment of a hospital, school and university within this location aims to optimise accessibility to essential facilities, while limiting the environmental and infrastructural costs associated with locating such uses closer within rural or to rural on undeveloped areas. Although the site currently supports crop production, the extent of land required for the proposed development constitutes only a small portion of the larger agricultural area and its conversion is justified by the substantial social and economic benefits that will accrue to the broader community and region.

Environmental and resource management measures will form an integral part of the development approach. Sustainable building design, energy and water efficiency technologies and best practice stormwater management will be implemented to minimise the environmental footprint and align with the WCSDF's climate resilience objectives. Furthermore, the layout will seek to retain and buffer adjacent agricultural activities where feasible, ensuring coexistence and mitigation of potential land use conflicts.

From a policy perspective, the proposal can be justified as a site-specific deviation in terms of the WCSDF's provisions for development outside the urban edge. Such deviations may be considered where clear spatial, social and economic merit is demonstrated and where the development supports broader provincial spatial objectives. In this case, the close proximity to existing neighbourhoods, the direct linkage to municipal services, the accessibility from all directions via high order traffic routes and the essential public nature of the proposed facilities collectively establish a strong justification for a context-specific adjustment to the urban edge when the MSDF is revised in 2027. The development therefore represents a pragmatic and policy-aligned response to spatial realities, ensuring that environmental protection and resource management objectives are met while responding to a critical social infrastructure need.

Ownership and the current land use arrangements further supports the balanced approach proposal. The property is owned by the developer of the envisaged hospital, school and university, while agricultural production is presently undertaken by a tenant on a lease basis.

The agricultural use thereof represents an interim activity pending future development rather than a long-term investment in agricultural production. The landowner has confirmed that the tenant will be permitted to continue farming on the remainder of the property until such time as additional portions are required for phased urban-related development. This approach ensures that productive use of the land continues in the short term, while simultaneously facilitating the gradual and orderly transition of land use in alignment with the WCSDF's principles of sustainable resource management and spatial efficiency.

4.3.3.7 Integrated Planning:

The proposed establishment of a hospital, school and university on land directly adjoining the existing urban edge aligns strongly with the WCSDF's objective of promoting integrated and coordinated spatial planning. The development represents a well-considered spatial intervention that strengthens the functional relationship between existing residential neighbourhoods and future social and economic opportunities. By locating these essential facilities in immediate proximity to established communities, the proposal reduces travel distances and supports a more equitable distribution of services within the broader municipal area.

Integrated planning is achieved through the deliberate clustering of complimentary social facilities within a single, accessible node via the N2 and R102, thereby facilitating the efficient sharing of infrastructure and services. The proposal draws directly on existing municipal water, sewer and electricity networks and links seamlessly to the existing road and transport systems serving the adjacent neighbourhoods. This coordinated approach prevents the anticipation of infrastructure, promotes cost-effective service delivery and ensures that future expansions of the town occurs in a structured and sustainable manner consistent with the spatial vision of both the WCSDF and the Mossel Bay SDF.

Furthermore, the proposed development contributes to spatial integration at multiple scales. On the local level, it integrates socially and functionally with nearby residential areas, strengthening the relationship between living environments and essential community facilities. At the regional level, it forms part of a broader network of higher-order social and educational institutions that will serve the Southern Cape region, reducing the need for residents from Hartenbos to Glentana as well as the farming community in the hinterland to travel extra-long distances to access specialised services.

The development also benefits from its strategic position relative to the regional shopping centre currently under construction approximately 100 metres away, separated by the R102. Together, these developments form a cohesive mixed-use precinct that combines commercial, institutional and community functions within a concentrated and highly accessible area. This spatial relationship promotes economic synergy, shared infrastructure use and enhanced accessibility, which directly support the WCSDF's objectives of spatial efficiency, economic diversification and integrated settlement structure. The proximity of these complimentary land uses will reduce vehicle trips, support public transport viability and establish a balanced urban node offering employment, education, healthcare and retail opportunities in close proximity to existing neighbourhoods.

In this manner, the proposal exemplifies the WCSDF's principles of integrated and sustainable development, demonstrating how coordinated land use planning can simultaneously promote environmental responsibility, social accessibility and economic vitality while reinforcing the broader goal of creating a compact, efficient and resilient urban structure for the Mossel Bay region.

Supporting Information:

- Historically sand was mined on the portion of Farm 219 situated on the opposite side of the N2, now known as Rem. Farm 219/11, and on which Hartland Lifestyle Estate is presently being developed. There is, however, no evidence of any mineable resources on the subject of

this application. Thanks to the nature and scale of the proposed development, it has the potential to strengthen and round off of this newly created eastern node in Mossel Bay. The result will be an alleviation of pressure on similar over utilized existing social services in Mossel Bay.

- The development programs are geared towards a process to meet people's choices to live a long and healthy life, get education, maintain a decent standard of living as well as the enjoyment of political freedom. The proposed development is specifically aimed at achieving these objectives and expectations, which are also accompanied by financial empowerment through job creation to the full spectrum of the community as these are basic facilities and not preferable land uses which are aimed at profiting like conventional residential development.
- Although the proposed development will not be financed with scarce public funds, which is meant to be, a regional water reservoir has been built on the remaining portion of this property by the municipality which also serves other developments in the area. However, this reservoir is financed directly by the developers in the long run by means of a pro rata payment in the form of their capital contribution. The long term benefits that this investment by the municipality have is not only limited to higher income groups, but also the creation of jobs in the short term as well as the long-term for a broad spectrum of the community. This is essential for economic growth, social stability and overall wellbeing requiring a focus on sustainable economic transformation, new sectors and eventually skills development.
- The objects of land reform in South Africa, according to which it become necessary in the post-apartheid era, to address historical injustices especially where it led to the expropriation of land and forced resettlement, are indeed relevant in the present case. Although not related to expropriation or displacement, it does relate to the utilization of land which could potentially have been used for an appropriate form of residential development. The flip side of the coin, however, is that any form of residential development is not socially sustainable without health and educational facilities.
- Remainder Farm 219 originally included Farm 219/10, now known as Hartenbos Landgoed, where 185 group housing units were developed and Remainder Farm 219/11 where Hartland is presently being developed and where eventually approx 2300 housing units will be made available on the free market. The development at Hartland is subject to the compliance with strict architectural guidelines which will, where practically possible, also apply to the proposed medical facility, secondary school and university now applied for. These guidelines have already given a distinctive sense of place to existing development in this part of Mossel Bay as far as urban fabric as well as open space systems are concerned. As there is no indigenous vegetation on the portion of Remainder Farm 219 where the proposed development will take place the sense of place thereof will not be in combination with natural landscapes like Hartland. All three sites will, however, be landscaped with the emphasis on the lower lying drainage area traversing the site in order to soften the overall aesthetic appearance thereof. The remaining area of Rem. Farm 219 which does not form part of this application offers ample land for future urban development complemented by an extensive area covered by an indigenous eco system. The green area will eventually when the developable part of this property is utilized for urban purposes form an integral part of the overall open space system in this part of the town.
- The end of apartheid structures in relation to urban settlements can be promoted by providing housing with ease of access to employment opportunities and government support education and health facilities in a settlement which is suitable for it. The proposed development, however, is not aimed at providing housing in a suitable area where these facilities are available, but to supply in the social needs of existing and future residential development which are facilities normally meant to be fulfilled by government support. Therefore, the development of housing in the close proximity of health and educational facilities is not applicable as in this case the rolls of responsibilities are interchanged, whereas the private sector fulfils the role which the government is normally responsible for.

- As pointed out in the above, the proposed development is aimed at bringing essential social facilities closer to existing and future urban development. This will promote public and non motorized transport for convenient accessibility considering that similar facilities are at the other end of Mossel Bay. Louis Fourie Road, as the main traffic corridor in Mossel Bay and access route to the existing medic clinic and high school, is already heavily congested. The proposed development will necessarily relieve the pressure on this road.
- There are no sensitive elements on the site that have biodiversity status and therefore this objective is irrelevant.

A reduced use of scarce environmental resources, especially water, fuel, building materials, mineral resources, electricity and land will be treated as a priority for the purpose of the proposed development. Therefore, water storage tanks will be provided at strategic locations, while solar power and gas appliances will also be used to save electricity. Due to practical considerations not necessarily much can be saved on building materials, but fuel savings may be experienced by the closeness of facilities such as the proposed hospital, school as well as the super market presently under construction in the close proximity.

4.3.4. Western Cape Land Use Planning Guidelines for Rural Areas (2019) (WCLUPGRU, 2019)

Goal 1: Promote sustainable and integrated rural development.

The guidelines aim to achieve balanced and sustainable development that integrates environmental, social and economic considerations.

- **Motivation:**
The proposed cluster of a hospital, school and university promotes sustainable rural development by introducing essential social infrastructure in a location that is spatially integrated with existing neighbourhoods. The facilities will provide access to healthcare, education and employment opportunities for both urban and rural communities thereby enhancing social well-being and economic inclusivity. The compact, clustered form of development limits the footprint on rural land, ensuring the efficient use of resources and alignment with sustainable principles.

Goal 2: Protect biodiversity, ecosystem services and natural resources. This goal seeks to protect critical biodiversity areas, watercourses and ecosystem services vital to long-term sustainability.

- **Motivation:**
The proposed development site has been carefully selected to avoid sensitive biodiversity areas and does not interfere with any identified ecological corridors or watercourses thanks to the application of mitigating design principles. Appropriate environmental management measures, including stormwater management, landscaping with indigenous species and buffering from adjoining agricultural land, will be implemented. These interventions will mitigate potential impacts and preserve the ecological functioning of the broader rural landscape.

Goal 3: Protect and maintain the integrity, authenticity and accessibility of rural landscapes, sense of place and agricultural heritage.

Development in rural areas should respect the scenic, cultural and agricultural character of the landscape.

- **Motivation:**
The site is directly adjacent to an existing urban edge and the R102 and will therefore be developed as a visually contained and well-designed institutional precinct. Building design, scale and landscaping will respect the rural character and scenic context by incorporating low-profile structures, natural materials and appropriate buffers. This approach ensures the development compliments, rather than detract from the visual and cultural integrity of the

surrounding rural area, effectively creating a transition between urban and agricultural environments

Goal 4: Protect and support the rural economy and its communities.

The guidelines emphasise retaining the viability of the rural economy, while enabling diversification and job creation.

- **Motivation:**
The development will contribute significantly to the rural economy through job creation during both construction and operational phases. The university and hospital will also generate demand for local goods and services, supporting secondary economic activities such as accommodation, transport and food supply. By clustering the facilities on a limited area of land preserving surrounding agricultural activity, the proposal maintains the integrity of the agricultural resource base while introducing economic diversification consistent with rural development goals.

Goal 5: Ensure appropriate location, scale and form of rural development.

Rural development should occur in suitable locations, be of appropriate scale and integrate effectively with existing settlement patterns and infrastructure.

- **Motivation:**
The proposed development's location directly adjacent to existing neighbourhoods within the urban edge represents a highly appropriate and sustainable position for facilities of this nature. The proximity allows for shared use of existing municipal infrastructure, efficient service delivery and easy accessibility via established road networks. The scale of the proposed facilities is regionally significant, but spatially compact, ensuring that the form and layout are appropriate for the transitional interface between urban and rural areas.

Goal 6: Promote institutional integration and good governance

This goal encourages alignment with Municipal Spatial Development Frameworks (MSDF's), the WCSDF and other policy instruments, ensuring coherent land use management.

- **Motivation:**
The proposal aligns with the Mossel Bay MSDF, which identifies the broader area for long-term urban growth and recognises the need for social facilities to serve expanding communities. The development supports WCSDF's objectives of spatial efficiency, spatial justice, and resilience by placing high-demand social infrastructure in an accessible and sustainable location. It also enables coordinated planning between provincial, municipal and private stakeholders in delivering essential public services.

Goal 7: Ensure efficient and sustainable provision of infrastructure and services.

Development should not impose unsustainable service or financial burdens on the Municipality.

- **Motivation:**
The site's proximity to existing urban services and high-order traffic routes allows for the efficient extension of infrastructure without significantly additional cost to the Municipality – an upgrade of the R102 by the developer may be required which will be to the benefit of also the Municipality. The development will be phased in coordination with demand priorities while service availability is taken care of – roads, internal roads and water, sewerage and electricity reticulation will be designed to Municipal standards. This approach ensures the long-term financial sustainability of the development and its compatibility with existing Municipal capacity.

Summary Statement:

In summary the proposed hospital, school and university are fully consistent with the seven goals of the Western Cape Land Use Planning Guidelines for Rural Areas, 2019. The project advances social equity, economic opportunities and spatial integration, while maintaining respect for the environment, agricultural and scenic character of the rural setting. It represents a balanced and sustainable form of development that supports both provincial and municipal spatial planning objectives.

4.3.5. Southern Cape Regional Spatial Implementation Framework, 2019, (RSIF)

The Southern Cape Regional Spatial Implementation Framework's objectives are aimed at stimulating inter-municipal growth and development opportunities for better support of an integrated, regional approach to sustainable development and urban and rural area management. The objectives are discussed in depth in the Mossel Bay Municipality Spatial Development Framework, but the following policies referred to in the RSIF require further comment:

- **Policy R1: Project biodiversity and ecosystem services.**

There are no elements of biodiversity or ecosystems on the site that require protection.

- **Policy R2: Safeguard inland and coastal water resources and manage the sustainable use of water.**

Although there is a natural drainage course traversing the terrain it should be pointed out that the run-off is relatively limited thanks to a storage dam higher up. Furthermore, the proposed road layout is designed to divert stormwater run-off to the lowest point in the southern corner of the property from where it drains naturally towards the Hartenbos River. The low lying areas will be used for facilities like sports fields and landscaped open spaces which are not susceptible to occasional wet conditions. The area where storm water run-off accumulates will be landscaped to form part of the internal open space system.

In conclusion it is clear that the protection of inland water sources is not relevant, as the proposed development does not adjoin any source directly. As a rule, the sustainable use of water, however, requires the management thereof in such a way that it satisfies current, ecological, social and economic needs without compromising the ability to meet those needs in the future. Amongst other things, this relates for example to the duration of a shower, effective irrigation methods for gardens, repair of leaks, etc. In addition, the supplementing of the municipal water supply by means of storage tanks is non-negotiable. These measures should be applied by the party controlling the proposed developments to help ensure the sustainability thereof.

- **Policy R3: Safeguard inland and coastal water resources, and manage the sustainable use of water.**

When developing strategies to safeguard inland and coastal water resources, it is essential to adopt an integrated and sustainable approach that balances ecological protection with human needs. This includes implementing effective water management practices.

- **Policy R4: Recycle and recover waste, deliver clean sources of energy to urban households, shift from private to public transport, and adapt to and mitigate against climate change.**

These policy aspects primarily relate to municipal functions. As far as the responsibilities of the management of the respective land uses are concerned in this respect, will give their cooperation by joining and participating in the municipalities recycle actions. In addition, it is planned to supply the proposed development components with solar power, gas and water storage tanks.

- **Policy R5: Protect and manage provincial landscape and scenic assets.**

The proposed development is situated at the foot hills of Jakkalskop which forms the backdrop thereof. As the terrain is presently used for crop production it does not form part of a provincial landscape and scenic asset which require any special protection. The rest of this farm which does not form part of this application will, however, require such measurements when

development takes place in the future due to the indigenous vegetation there and potential skyline issues related to Jakkalskop.

- **Policy E1: Use regional infrastructure investment to leverage economic growth.**
This policy is a municipal function that does not directly relate to the proposed development. The availability of municipal bulk services such as the water storage reservoir on Jakkalskop, the Hartenbos waste water treatment plant and the existing Hartenbos north (C11/11kV) switching station along the Monte Christo road are conducive to the implementation of the proposed development. This development will necessarily be a significant economic injection for the Greater Mossel Bay as it will promote the establishment of other subsidiary developments normally encompassing various aspects like market expansion, diversification and strategic initiatives thereby result in the optimal use of these bulk services.
- **Policy E2: Diversify and strengthen the rural economy.**
This policy also primarily requires governmental and municipal input and stimulus. Presently the land concerned officially forms part of a semi-rural area although the proposed development will change the status quo. It is, however, foreseen that the rural economy will be indirectly benefitted by the proposed development, since it will not only create a greater demand for agricultural products from the region, but also diverse job opportunities that economically empower the local community on a broader basis.
- **Policy E3: Revitalise and strengthen urban space-economies as the engine of growth.**
As already discussed the proposed development is a result of an urgent need for these social services. The implementation thereof makes a positive contribution in strengthening the urban economy of the Greater Mossel Bay in terms of the demand for a wide variety of services and products which necessarily will revitalise and strengthen the urban space economies as the engine of natural growth.
- **Policy S1: Protect, manage, and enhance the provincial sense of place, heritage and cultural landscapes.**
These policy guidelines rest primarily with the authorities to initiate, finance, promote and maintain them.
- **Policy S2: Improve provincial, inter-, and intra-regional accessibility.**
The improvement of regional accessibility at all levels is a national, provincial and municipal function over which the private sector hardly has any control.
- **Policy S3: Ensure compact, balanced, and strategically aligned activities and land uses.**
As each of the three proposed land uses consist of various interrelated components, a compact formed thereof is not readily achievable. Due to the natural drainage areas traversing the sites a compact format of developments is even more complicated. These various components will, however, be strategically aligned to ensure that it work cohesively towards the same strategic vision, viz. the provision of quality health care and education.
- **Policy S4: Ensure balances and coordinated delivery of facilities and social services.**
The existing development at Hartland Lifestyle Estate, Hartenbos Landgoed, Monte Christo and Outeniquasbosch as well as the proposed and approved developments at Mystic Views and the abutting New Vintage Residential Estates provide for a balanced housing typology offering housing between the top end of the market, more affordable group housing and flat apartments, but the need for social facilities deriving from these residential projects has now become a challenging problem. Such a lack in the availability of these services is obviously not conducive to favourable conditions in the present and future residential market, considering the dire need thereof which already exists. Therefore, the proposed facilities will not only satisfy an existing demand, as previously discussed, but will also be conducive to a balanced and coordinated delivery of facilities and social services pertaining to future residential development in the immediate proximity thereof and that of the coastal towns to the east thereof.

- **Policy S5: Ensure sustainable, integrated and inclusive housing planning and implementation.**

The sustainability, integration and inclusivity of housing planning and implementation are only as successful as the extent of availability of social services supporting it. Therefore, the availability of the proposed land uses is not simply a 'nice to have' as they play a critical role in ensuring alignment with the objectives of this policy.

4.3.6. Garden Route District Municipality Integrated Development Plan (IDP).

The I.D.P. sets out and put in place coherent objectives and goals to support Municipalities fulfil their municipal planning mandate in line with national and provincial agendas. As this for the most part is a municipal function which the applicant has no control of it will not be discussed further in this motivation report and will be covered in the following paragraph which discusses the Mossel Bay Municipality's Integrated Development Plan, 2022.

4.3.7. Mossel Bay Municipality's Integrated Development plan, 2022

The I.D.P. sets out and put in place strategic processes which are aligned and fully integrated in order to prevent ad hoc or fragmented development within the Mossel Bay Municipal area. The Mossel Bay IDP 2022 – 2027 aligns these sector plans to strengthen the alignment with national and provincial agendas and to give effect to achieving its IDP objectives. As this for the most part is a municipal function which the applicant has no control over it will not be discussed further in this motivation report.

4.3.8. Mossel Bay Municipality Spatial Development Framework, 2022 (M.S.D.F).

4.3.8.1. Strategies:

4.3.8.1.1. Strategy 1: Conserve and manage the natural environmental in balance with the demands from urban growth and agriculture use:

- **Policy 1A: Manage and preserve the mountains, natural vegetation, streams and rivers in a manner which protects the natural ecosystems.**

The land unit involved in this application does not have a mountain, natural vegetation and a river which should be taken into consideration. There is, however, a natural drainage course with relatively limited run-off which is accommodated in the layout proposal for the respective land uses. The area concerned is presently used for crop production and therefore the protection of a natural ecosystem is not a consideration.

- **Policy 1B: Manage and protect the coastline, rivers and estuaries.**

The site does not abut the coastline, a river or a lagoon as it is located more than 1.5km from the closest river/lagoon.

- **Policy 1C: Facilitate public access to the coastline and control land-ward activities.**

As the proposed development is not situated in the immediate proximity of the coastline it is not readily possible to facilitate access thereto. Land-wards activities can, however, be controlled to some extent, as it belongs to the same owner. A separate application for the withdrawal of the entire Farm No. 219 from agriculture is presently also in the process. The application for such development is, however, not now part of the present application as it will only become necessary once the development of Hartland is in an advance stage which is foreseen to be within the next five years.

- **Policy 1D: Protect the visual integrity of the rural environment.**

As the subject of this application is presently used for crop production it has a predominantly rural character. It is, however, surrounded on two sides by existing urban developments and high order traffic routes as well as existing and approved developments on the other side thereof. It is situated in a low lying area at the foothills of Jakkalskop which dominates the back

ground. Therefore, the visual integrity thereof is not a significant issue demanding special protection. Therefore, the visual integrity of the area is largely kept unspoiled.

4.3.8.1.2. Strategy 2: Secure sufficient water and food for future demands

- **Policy 2A: Monitor and manage the availability and use of water.**

The proposed development can be supplied with water directly from the bulk line from the reservoir on the top of Jakkalskop which traverses Rem. Farm 219. In order to decrease the level of dependency on this rainwater source storage tanks will be supplied at the buildings for the purpose of irrigating the gardens. As the buildings normally associated with the proposed land uses cover extensive areas it is foreseen that this method of accumulating water will contribute significantly towards water conservation and reduced stormwater run-off.

- **Policy 2B: Optimize food resources and pursue innovative agricultural and food practices.**

The proposed development will not form part of an agricultural way of life and therefore the production of food will not be a consideration. On the contrary, it will replace the agricultural use of the land with urban development, but the rationale behind it is discussed in full in par. 4.2.9 and 4.5.1.

4.3.8.1.3. Strategy 3: Facilitate opportunities for utilization of renewable energy

- **Policy 3A: Accommodate innovative proposals for alternative energy sources.**

For the time being, the bulk production of energy and the storage thereof is not a consideration, but in order to safeguard the supply of electricity to the proposed land uses, especially the hospital which is a strategic social facility, individual solar systems will be provided. The development of a solar farm on the Remainder Farm 219, behind Jakkalskop where it will not be visible from the N2 once the development at Hartland justifies it, is a strong consideration. A suitable site has in fact already been identified.

4.3.8.1.4. Strategy 4: Manage urban growth and urban restructuring to establish an urban form able to serve current and future Mossel Bay community needs

- **Policy 4A: Future urban form design is to be based on future scenario planning in the SDF.**

Urban design forms are directly influenced by the availability of suitably located developable land and effective traffic flows. As previously discussed the proposed development should not be regarded as urban sprawl, but rather as a textbook example of infilling between existing developments, viz. Hartland Lifestyle Estate, directly south-east thereof, Monte Christo, Outeniquasbosch and the future New Vintage project abutting it on the western side. Kleinbrak River, with a strip of indigenous vegetation and the river in-between, forms the third 'boundary' while the Jakkalskop ridge forms the inland boundary. This parcel of land is well-situated for the proposed development as it is served by high order traffic routes, viz. the N2 and R102, in the immediate proximity thereof, with safe and efficient access thereto. Therefore, the future necessity thereof to include it in the urban edge, as referred to in par. 5.3.1. of the S.D.F., should be an inevitable result of sound planning to the creation of a compact urban design when the SDF is revised in 2027 benefitting the provision of services on a sustainable basis. Considering that the proposed land uses are strategic and essential for each and every one it will also contribute towards a more vibrant community living in an area that is full of energy, life and positive engagements and where members feel connective, supported and have opportunities to thrive, both individually and collectively. Therefore, by supporting the proposed development the key components will be in place to plan a strategic approach in envisioning and preparing for multiple potential future land uses in this part of Mossel Bay.

In combination with the wide variety of land uses provided for in this area, including a new regional shopping centre, where it is foreseen that the main population growth of Mossel Bay will take place in future, it is foreseen that the residents will not have to travel long distances somewhere else to satisfy their basic needs. This will alleviate traffic congestion on the already overburdened main traffic corridors in Mossel Bay, especially Louis Fourie Road. Consequently, the implementation thereof focuses on strategically shaping the future urban design of this part of Mossel Bay, ensuring that current planning aligns with projected scenarios and the long-term objectives outlined in the M.S.D.F.

- **Policy 4B: Prioritise efficient urban form.**

The proposed development, as already discussed, forms a logical process of infilling between Hartenbos and Kleinbrak River. It not only provides compactness in terms of the urban form, but it is also located along the route of existing bulk services, which promotes cost-efficiency from an urban infrastructure point of view. Discouraging private motorized trip generation will be promoted by adding the proposed essential social services to facilities which already exist in this area or which are in the process of construction.

- **Policy 4C: Creation of an Open Space/Conservation network.**

There is no conservation worthy vegetation on the site, but the low lying natural drainage courses traversing it lends itself to the creation of internal landscaped open spaces.

- **Policy 4D: Implementation of biodiversity offsets as a tool for an efficient and sustainable urban form.**

An efficient and sustainable urban form is aimed at prioritizing resource efficient design and organizing urban development to meet current needs without compromising the ability of future generations to meet their own prioritizing environmental, social and economic sustainability. In order to achieve this the following key components of sustainable urban form needs to be identified:

- **Compactness:** The proposed development is, as previously discussed, a classical example of infilling between Hartenbos and Kleinbrak River whereby compactness is rendered to the urban form in a macro context
- **Mixed land uses:** Apart from the predominant residential land use pattern in this area, which also includes 490 retirement units, there is also a newly developed filling station as well as a regional shopping centre currently under construction in the close proximity of the site. Swanns nursery on the opposite side of the R102, will be replaced by a new regional nursery. The soon-to-be built primary school at Hartland adds to the variety of mixed land uses in this area. The missing elements, however, are social facilities such as a medical care centre and a broader spectrum of educational institutions. These facilities are indispensable for the functioning of a community designed neighbourhood where residents can meet most of their daily needs locally without having to travel long distances.

Considering the above it is evident that the proposed land uses will play a major role in ensuring that a wide spectrum of mixed uses will be present in this area in order to promote a sustainable urban form.

- **Diversity:** The proposed development will promote dynamic and inclusive communities as each and everybody is dependent on medical care and education.
- **Accessibility:** The proposed development is situated next to the R102 which gives direct access to not only Hartenbos and Mossel Bay, but also to the N2 linked to the entire Garden Route via intersections in the close proximity thereof.
- **Greening:** As previously mentioned the low lying natural drainage course on the terrain will be landscaped as an internal open space system. By complying with the criteria as discussed in the above a balance can be struck to ensure environmental,

social and economic priorities which will promote an efficient and sustainable urban form.

- **Policy 4E: Maintain a compact settlement form to facilitate inclusion and integration and improved service delivery.**

Due to the nature of the proposed developments and topographical features of the terrain it is not readily possible to cluster the buildings too closely together in a concentrated area.

- **Policy 4F: Provide places of residence closer to places of work.**

In this case it is not a matter of locating places of residence closer to work, but rather the grouping together of essential and strategic social facilities closer to places of residence. This area has already become the main focus point of absorbing the present and future demand for residential and related developments.

- **Policy 4G: Direct public investments (public facilities, amenities and services), commercial activity and residential densification towards the urban core and priority nodes.**

Mossel Bay has a narrow linear shape due to the coastline on the one side and topographical constraints and sensitive indigenous vegetation on the inland side thereof. Therefore, the densification of public facilities, amenities and services as well as commercial activities and residential densification closer to the urban core is not readily possible. The strive to achieve this goal is also curbed due to the hilly topography of the urban core. It is, however, possible to locate these facilities in an identified priority node such as the area where the development is presently proposed considering the development friendliness thereof to satisfy the present and future needs of the Greater Mossel Bay community.

- **Policy 4H: Apply densification in existing settlements and neighbourhoods to a more compact urban pattern and to reduce cost of service to households.**

Densities of existing residential developments in this area are as low as 6 units/ha which is not conducive to sustainable service delivery. Therefore, an increased density was targeted with the planning of Hartland Lifestyle Estate where the eventual net density thereof (excluding big open space areas which are situated where bulk service infrastructure is not required) upon implementation of the whole Hartland will be in the order of approximately 17 units/ha. The availability of the proposed essential social facilities will necessarily promote urban compaction in this part of Mossel Bay with the result that existing municipal bulk services will be used more optimally.

- **Policy 4I: Apply a housing settlement policy that can supply in the demand for the full spectrum of property typologies and property prices in a manner that supports the spatial vision of the SDF.**

The proposed social facilities will serve the full spectrum of the population as each and every one is dependent on the availability thereof. Therefore, availability thereof will necessarily promote the development of the full spectrum of residential typologies. The existing and approved future development of Hartland, for instance, provides for a total of approx. 2300 residential units, while the other existing and approved developments in the close proximity thereof, as previously discussed, provide not only for a wider variety of residential and related opportunities, but will also result in a substantial increase in the density of this area.

- **Policy 4J: Provision of balanced subsidised housing:**

The proposed development is not aimed at providing any form of privately owned housing, but rather an effort to meet the social needs of not only the residents of the abutting developments, but also the beneficiaries of subsidized housing in the nearby Sonskynvallei, Power Town and others in the area including Friemersheim.

The only residential component involved in the proposed development, however, will be staff accommodation for the medical staff as medical centres are required to provide training and accommodation for their own staff, while hostel facilities will be made available for the accommodation of scholars coming from somewhere else in the region/country.

- **Policy 4K: the adequate provision of social facilities.**

As previously discussed, the proposed development is exclusively aimed at the provision of adequate social facilities which will meet the most basic needs of a diverse community with special reference to the medical and schooling aspects thereof. In this regard it should also be pointed out that the development of Hartland, which is on the opposite side of the N2 and R102, already provides for a soon to be built primary school. The proposed university site represents a necessary and strategic response to a community's growing demand for accessible tertiary education in a rapid growing region where such a facility is currently unavailable.

- **Policy 4L: Optimum utilization of under-utilised or unutilised Municipal land to the benefit of the community.**

As discussed throughout this report, the consolidation of the proposed hospital, school and university into a complimentary core of social facilities will yield significant benefits for Mossel Bay, even though the site is situated outside the existing urban edge. The strategic grouping of these facilities promotes integrated service provision, shared infrastructure and improved accessibility to the broader community. Conversely, locating a hospital for instance, within the urban edge, but beyond the effective reach of its primary service area would undermine the intended regional function of these facilities. Throughout this report, it has been clearly demonstrated that no such under-utilised or unutilised municipal land exists that complies with all criteria necessary for the development of the proposed core node of social facilities. The proposed site therefore represents the only viably and sustainable location capable of accommodating these essential facilities in an integrated and accessible manner, consistent with the intent of Policy 4K in the MSDF. Therefore, privately owned land belonging to the applicant and which is situated directly across the road from Hartland Lifestyle Estate where eventually ±2300 households will be accommodated plus the other neighbourhood adjacent or in the close proximity to the proposed development, which eventually will accommodate a total of approximately 4781 households, is proposed for this purpose with the result that the implementation of this policy is not feasible. Therefore, if such land is available somewhere else where it is not suitably located for the land uses now applied for it can be made available for other needy community services. To disregard these realities merely because the subject land unit lies outside the urban edge would be a short sighted approach, inconsistent with sound and forward-looking town planning principles. The proposed hospital, school and university together represents a strategic social investment that will not only address the pressing service needs of the surrounding neighbourhoods, but also serve as a catalyst for balanced regional growth. An inflexible interpretation of the urban edge boundary risks undermining the broader objectives of sustainable and integrated development, where accessibility, efficiency and social equity should guide planning discussions rather than rigid spatial planning delineations.

The proposed clustering of the proposed land uses also supports the objectives of the Western Cape Spatial Development Framework by promoting spatial equity and improving access to essential social services within a strategically accessible location directly adjacent to rapid growing neighbourhoods. Therefore, an inflexible interpretation of the urban edge boundary would therefore also be in conflict with the WCSDF's intent to facilitate well-located, inclusive and efficient development that addresses both current and long-term social and spatial needs.

- **Policy 4M: Bulk Municipal service infrastructure (water, sewerage, electricity, roads, stormwater and refuse removal).**

The provision of bulk services is a municipal function and therefore from a private sector's point of view, no influence can be exerted on it except where such services are required in which event a pro rata capital contribution is made to facilitate the provision thereof.

4.3.8.1.5. Strategy 5: Provide a safe and secure environment for all residents and visitors

- **Policy 5A: Requirements for safety and security must be incorporated in all spatial and land use planning.**

Due to the nature of the proposed development as a gathering place for patients, hospital staff, children, teachers, students and university personal strict security measures will be applied. This will include security fencing and surveillance.

- **Policy 5B: Identify high risk areas and formulate risk mitigation.**

With regards to personal security it needs to be mentioned that presently this area is not prone to a high crime rate. This situation may well change in future as more developments take place here and in the vicinity. Therefore, security measures will be put in place as discussed in the above Policy 5A.

Excessive steep slopes passing posing high risk development challenges should also not be a source of concern as the general slopes of the different developments packets are gradual to relatively flat – on the Site Development Plan the terrain may look steep at some parts of it, but it should be pointed out that the contours have 0.5m intervals creating the false impression of steepness.

There are also no activities whereby explosions are involved, noise or polluting activities in the vicinity of the development terrain posing any risk. Furthermore, no development is proposed at or close to potential landslide areas on unstable ground conditions – see extract from geotechnical report by Terra Geotechnical attached as Annexure 13.

4.3.8.1.6. Strategy 6: Create a local economic base to provide sustainable employment opportunities

- **Policy 6A: Focus on the encouragement and attraction of small businesses to support local entrepreneurs.**

The proposed development will not entail any small business, but it will have a significant impact on other local entrepreneurs in the vicinity thereof with special reference to the filling station with related business orientated land uses as well as the regional shopping centre which is currently under construction.

- **Policy 6B: Economic growth stimulation through catalytic project establishment and promotion.**

Economic growth stimulation through catalytic projects establishment signifies the launch of a high priority, large scale project intended to drive significant positive change and create a ripple effect of benefits within a specific area or sector. The proposed three development components are prime examples of projects that will generate significant opportunities for highly skilled labour likely to be drawn here from all over the country. This phenomenon will add insurmountable value to transformation of the community through improved productivity, enhance innovations as well as improving the competitiveness of not only the institutions they work for, but also that of other similar institutions in the Southern Cape Region.

Furthermore, the development will also offer a variety of employment opportunities to unskilled labour with the prospect of upliftment of skills through exposure to new skillsets. Such uplifting occurs when individuals are exposed to a team with various abilities and competencies, potentially through observation, instruction or practical application, which can lead to a broader understanding and development of these skills.

4.3.8.1.7. Strategy 7: Ensure a municipality that is functioning on a financially sustainable basis

- **Policy 7A: Apply basic principles which guide Municipal Financial Sustainability.**

The private sector has no direct control over this strategy except at the ballot box. In this respect, however, Mossel Bay is equipped with a local authority that is eminently compliant with this strategy.

4.3.9. By-Law on Municipal Land Use Planning of Mossel Bay Municipality, 2021.

According to Section 38(1), the following documents are required in support of the application:

- 4.3.9.1. Annexure 1**, The application form fully completed by the applicant Nel & de Kock Town and Regional Planners;
- 4.3.9.2. Annexure 2**, Power of Attorney to Nel & de Kock Town and Regional Planners by the authorised representative of the registered owner to prepare and submit this application;
- 4.3.9.3. Annexure 3**, Company Resolution and proof of company membership which appoints Nel & de Kock Town and Regional Planners by the authorised person to compile and submit this application;
- 4.3.9.4. Annexure 4**, Motivation Report by Nel & de Kock Town and regional Planners;
- 4.3.9.5. Annexure 5**, Copy of the Surveyor General Plan is attached to this application;
- 4.3.9.6. Annexure 6**, Proof of Payment will be submitted once it is made available to the applicant;
- 4.3.9.7. Annexure 7**, Plan No. HB/C/211-2 dd. November 2025;
- 4.3.9.8. Annexure 8**, Site Development Plan No. 01-01-D101 of Project No. 24664 Rev. U by Mere Group Pty Ltd.;
- 4.3.9.9. Annexure 9**, Copy of Title deed T15744/2023 is attached to this application and does not contain any conditions that place a restriction on the proposed development, as confirmed in the accompanying Conveyance Certificate by Sonja Bantjies;
- 4.3.9.10. Annexure 10**, Conveyancer Certificate by Sonja Bantjies of Miltons Matsemela Oosthuizen Inc. is attached to this application;
- 4.3.9.11. Annexure 11**, Copy of Pre-Application Feedback dd. 21/08/2025 is attached to this application;
- 4.3.9.12. Annexure 12**, Bulk Engineering Service Report by Element Consulting Engineers dd. May 2025 is attached to this application;
- 4.3.9.13. Annexure 13**, Geotechnical Report by Terra Geotechnical dd. 08 August 2025;
- 4.3.9.14. Annexure 14**, Agricultural Assessment by SoilZA dd. 19 December 2024;
- 4.3.9.15. Annexure 15**, Private Hospital Market Study by Fernridge Healthcare dd. February 2024;
- 4.3.9.16. Annexure 16**, Private School Market Study by Demacon dd. April 2024;
- 4.3.9.17. Annexure 17**, Mossel Bay Municipality SDF Extract; and
- 4.3.9.18. Annexure 18**, Plan indicating the Urban Edge.

4.3.10 Title Deed

According to a search conducted by Miltons Matsemela Oosthuizen Inc. in the Deeds Registry, Cape Town, regarding Remainder Farm Vaale Valley No. 219 it was found that there are no restrictive conditions registered in Deed of Transfer No. T15744/2023 against this property prohibiting it from being used for the development as proposed on Plan No. HB/C/211-2. The 15m wide Pipeline servitude on the property is accommodated in the development proposal without restricting implementation of the project.

4.4. Character of the Environment

The subject to this application is surrounded on two sides by either existing urban developments, viz. Hartland Lifestyle Estate and/or approved residential developments which are bound to be developed soon. The Kleinbrak River Village forms the third boundary separated by a stretch of indigenous vegetation and a river. Therefore, as previously discussed, the proposed development will serve as a textbook example of infill development amongst three existing and/or future residential developments which will be served by the social facilities now applied for. The fourth side thereof is bordered by the remaining portion of Remainder Farm 219 where substantial future residential development can take place. The latter, however, does not form part of this application as Hartland Lifestyle Estate still has enough approved developable land available for the next approximately five years. At this point in time these existing and soon to be developed residential neighbourhoods in the area as well as similar developments further afield which are in dire need of the proposed essential social services now applied for and discussed in the above par. 4.1.1., 4.1.2. and 4.1.3.

Presently, this area has a semi-urban character which can be ascribed to the undeveloped Remainder Farm 219. Once the proposed development is implemented on a portion of this property it will have a predominant urban character. This initiative will set the tone for the future development of a diverse residential component on the remaining portion of this property which will necessarily also benefit from the proposed social facilities now applied for. It is, in fact, foreseen that the presently proposed development will expedite the process of urbanization in this part of the Greater Mossel Bay in which event the present dry land crop farming character thereof will change irrevocably, making a positive and necessary shift in response to long-term planning objectives and the evolving needs of the Mossel Bay community. Presently, this property with its crop field does not have any natural features that need to be protected apart from the indigenous vegetation in the far background where it forms the backdrop thereof and which will always stay intact despite any further development in future.

There is no natural, or for that matter any vegetation on these crop fields which can add value to the natural beauty of this area once it is developed. Therefore, given the site's high visibility from major traffic routes, it is imperative that meticulous attention be paid to its landscaping. The drainage corridor running through the site presents an opportunity to establish integrated landscaped zones that weave through the planned land uses enhancing both functionality and aesthetics.

It is anticipated that the envisaged high-quality development, comprising a school, hospital and university, will create a significant visual statement through its architectural and spatial design qualities, thereby establishing a distinctive landmark that defines the eastern gateway to Mossel Bay. In doing so, the development will contribute to strengthening the town's sense of place and spatial identity, functioning as a structuring element within the regional development frameworks while reinforcing the principles of spatial efficiency, resilience and integration as promoted by SPLUMA.

4.5. Potential of the property

4.5.1. Agriculture

According to an agricultural analysis conducted by Soil ZA the land concerned is classified as ranging from medium to high agricultural sensitivity – see report attached as Annexure 14.

The high sensitivity classification is due to the land being classified as cropland.

It is, however, stated in the report that “the acceptability and ultimate approval of development cannot be based purely on its agriculture impact, but requires the weighing of many diverse factors, which include the high demand for development within Mossel Bay and the fact that this area is designated for foreseeable future expansion in the Mossel Bay Development Framework. Such a weighing is far beyond the scope of an agricultural impact assessment, which cannot therefore conclude on the overall acceptability of the development.”

This conclusion is grounded in the widely accepted principle that development should be supported by the following three core pillars of sustainability: viz. social, economic and environmental.

- **Social Sustainability**

Social sustainability is aimed at practicing the prioritizing of people's well-being and communities by creating inclusive societies that are equitable, democratic and peaceful. The development now applied for and which will cover approximately 23.7326ha of the Remainder Farm Vaale Valley No. 219 will provide for social facilities such as a school, a university and medical clinic/hospital with accommodation for the medical staff. As previously pointed out these facilities are not aimed at creating new residential development which will aggravate the demand for social facilities, but on the contrary, it will satisfy the ever increasing demand for these social facilities in this part of the Greater Mossel Bay created by residential development.

It can be concluded that converting agricultural land for the development of the proposed hospital, school and university will enhance the living conditions of residents in this area and further to the east up to Glentana as well as the agricultural hinterland by establishing a socially sustainable, inclusive community that promotes equity, democracy and peaceful coexistence. It can, however, be argued that food production is equally important, but considering the location of the land concerned in terms of Mossel Bay's natural direction of growth as foreseen in the S.D.F. it is fair to conclude that a change in land use for the purpose of urban development is for all practical purposes an inevitable 'fait accompli'.

- **Economic Sustainability.**

Economic sustainability refers to practices that support long term economic growth without negatively impacting social environmental and cultural aspects of the community. As Remainder Farm Vaale Valley No. 219 is earmarked in the Spatial Development Framework for possible future urban expansion it is evident that the present use thereof for agricultural purposes is merely a temporary arrangement without supporting long term economic growth. The urban land uses now applied for do not only facilitate long term urban related economic growth, but will also satisfy the present need for social facilities such as a secondary school and hospital. An educated and healthy community will necessarily enhance long term economic growth and contribute towards a better quality of life without having any negative impact on the social environmental and agricultural aspects of the community. The present agricultural use of land will undoubtedly support food security and economic growth, but considering the location thereof, as previously referred to, this option implies only a short-term benefit hampering the implementation of land uses with long-term economic benefits as discussed in par. 4.2.9. Therefore, the sooner land uses with long term benefits are implemented the sooner the community can reap the benefits thereof which will create new opportunities for the establishment of related land uses whereby long-term economic growth is promoted.

- **Environmental Sustainability.**

Environmental sustainability is the practice of managing natural resources in a way that meets the needs of the present without compromising the ability of future generations to meet their needs. It involves balancing economic, social and ecological goals.

Presently the subject of this application is used for crop production as well as cattle and ostrich farming. The crop production poses no direct impact on the environment, but the cattle and ostrich farming on the remaining portion of this farm do impact negatively on the indigenous vegetation which covers approximately 30% of the land unit. The footpaths of these animals create open areas which are prone to invasion by exotic plants like Acacia species such as rooipitjie and wattle which on the long run infest and degrade an entire indigenous plant community. Although the proposed development will not occur on the ecologically sensitive portion of the property, it is important to identify potentially harmful activities in advance to mitigate any risk of damage to the system. Therefore, the sooner the agricultural activities on this property are terminated and replaced by land uses which do not pose a threat to the environment the sooner a process of rehabilitation of the infested area can be commenced with. Conservation of the remaining portion of Remainder Farm 219 should be pursued through a process of controlled and responsible development, aligned with sustainability principles. In this context, it is proposed that approval of any future development on the Remainder be made subject to a condition requiring the rehabilitation of areas invaded by alien vegetation. This approach offers a 'quid pro quo' whereby development rights are

balanced with tangible environmental gains. The rehabilitation of these infested areas will not only enhance the property's ecological integrity when it is developed in future, but also contribute to the broader environmental objectives outlined in the Environmental Management Framework (EMP) and Municipal planning policies. This condition serves to transform degraded land into an asset for both the community and the environment. Such a rehabilitation process should be executed in phases as the development progresses.

Another concern is the significant soil erosion currently accruing on the subject land portion during periods when it lies fallow, with no crops planted. While this is a common issue in agricultural settings it becomes more problematic given that the land is intended for future urban development according to the S.D.F. To mitigate further erosion, it would be prudent to initiate the proposed development sooner rather than later, thereby stabilizing the soil and reducing environmental degradation. This approach will give impetus to the principle of environmental sustainability by managing natural resources in a way that meets the educational and health care needs of the present without compromising the ability of future generations to meet their needs.

4.5.2. Recreation

There is no natural source of recreation on the site that justifies the establishment of a resort of any sort. The proposed school and university will, however, require a variety of sport and recreational facilities which will be provided by the respective institutions.

4.5.3. Conservation

4.5.3.1. Nature

There is no conservation worthy vegetation present on this land parcel. The northern outskirts of the remainder of Remainder Farm No. 219, which falls outside the boundaries of this application, contains pristine indigenous vegetation that warrants rehabilitation and conservation measures when this area is eventually opened for urban development, in order to preserve its ecological integrity and contribute to the environmental sustainability of the broader development area.

4.5.3.2. Urban

Until recently, development in this area maintained a predominantly rural character. However, since the commencement of development at Hartland Lifestyle Estate in 2019, the area is in an ongoing process of transformation, increasingly reflecting a semi urban character. At all those developments strict architectural guidelines are in place. As more phases at Hartland Lifestyle Estate are implemented the urban character of this area is continuously strengthened. The foresight of the developers in this area who implemented architectural guidelines for buildings and landscaping before development began, ensure the establishment of a distinctive urban character that is now worthy of conservation. Where applicable the same architectural and landscaping guidelines like at Hartland Lifestyle Estate will apply to the proposed social institutions in order to create a harmonious urban fabric consistent and worthy of conservation.

4.5.4. Mining

As of date no exploitable materials which has the potential to be mined have been found on this specific portion of Remainder Farm 219.

4.5.5. Township Development

4.5.5.1. Residential

The favourable location of the land concerned in terms of its accessibility to main traffic routes, other residential developments in the area as well as a future regional shopping centre complimented by the favourable topographic features thereof, it can be concluded that the potential thereof for residential purposes is high. At this point in time, however, there is a far greater demand for the social services now applied for to serve not only the existing and approved residential developments in the surrounding areas, but also those at Kleinbrak River, Grootbrak River, Rheeboek, Tergniet Outeniquastrand, Glentana and Friemersheim including the farming communities in these areas as well as those in the Brandwacht area. The future residential development that can potentially take place on the remainder of Remainder Farm 219 should also be taken into consideration. These favourable conditions for residential purposes are even more applicable to the proposed three land uses now applied for with special reference to the accessibility of the hospital as an emergency service for especially the retirement resorts at Hartland Lifestyle Estate and Monte Christo where in total approximately 1 050 elderly people will be accommodated. Therefore, it can be concluded that the potential thereof for the proposed development is exceptionally high.

4.5.5.2. Commercial/Light Industry

In addition to Voorbaai which has already been fully developed as a commercial/light industrial area and N2 Industria, an area on the Aalwyndal plateau has been identified for commercial/light industrial purposes according to the Spatial Development Framework and Aalwyndal 'Precinct Plan'. The reason for this is the presence of several favourable conditions, including topography and the relative close proximity to the labour force. Although the subject property demonstrates several characteristics, such as ease of access and relatively favourable topography that would typically support its consideration for commercial and/or light industrial purposes, it would be strategically inappropriate to designate it as such. This is because doing so would undermine the spatial planning intention to concentrate similar land uses within the Aalwyndal area which has been specifically identified and set aside to accommodate such economic activities.

Maintaining this focus is essential to avoid fragmented development and to ensure the long-term viability and functionality of Aalwyndal as a commercial and light industrial node. If the implementation of the commercial/light industrial development at Aalwyndal does not fully materialise, due to limited services, botanical and aviation limitations, however, it will have to be reconsidered regarding the establishment of also a light industrial area in the vicinity of Hartland. This will not only result in the workplace being located closer to the various new residential developments in this area and thereby reducing traffic on the main access roads to Mossel Bay, but it will also be more accessible as a source of employment for Sonskynvallei and Power Town than Aalwyndal. Consequently, it can be argued that while Remainder Farm 219/11 does possess certain attributes, such as good accessibility and favourable topography that make it suitable for commercial/light industrial purposes, it is ultimately in the interest of the Mossel Bay's long-term planning objectives to preserve this prime residential related land and avoid introducing incompatible development that could undermine its intended character.

By rather utilizing this particular portion of land for the development of essential social services, as currently proposed, the broader spectrum of the community will benefit.

4.5.5.3. Business

Although the subject of this application is situated next to the R102 which forms a direct road link between Kleinbrak River and Mossel Bay/Hartenbos the potential thereof for business purposes is negated due to the construction of a new regional shopping centre with a more favourable location for business purposes in the immediate proximity thereof. In future when the remainder of Remainder Farm 219 is developed for residential and related purposes the introduction of a small local convenience store will, however, be considered as part of such development.

4.5.6. No Development

As discussed in the above the land concerned has a high potential for a variety of urban related land uses. Given the favourable development conditions associated with this land unit, as outlined in this report, and the fact that it represents a logical infill between Hartenbos and Kleinbrak River, a 'No Development' scenario would be counterproductive to the objective of creating a compact urban form that optimizes the use of municipal bulk services and the provision of essential social facilities for a broad spectrum, of the community.

4.6 Location and accessibility

The terrain is located at coordinates 34°05'57.44"S 22°07'0.69"E. The location thereof in relation to the environment and the infill role it will fulfil within the broader context of the urban morphology of the Greater Mossel Bay have already been discussed in this report. The same applies to the favourable accessibility thereof in terms of the N2 and the R102. No direct access onto the N2 will be possible, but there are two intersections with this road approximately 1.0km away. There will also be two accesses from the R102 of which the horizontal and vertical alignment in both directions are excellent. – see Service Report by Element Consulting Engineers. Both road authorities involved will be consulted for an approval in this regard.

4.7 Provision of Services

Hereby the following extract from the conclusions by Element Consulting Engineers of their Service Report dd. May 2025 – full copy of report available on request, but the application to the Municipality will be accompanied by the full copy for consideration by the Technical Department.

The following conclusions can be reached from the High Level Bulk Engineering Services Report on the development of Hartland II (Jakkalskop) Estate on Remainder of Farm Vaale Valley 219, Mossel Bay:

1. "A services agreement (SA) will be signed between the developer and the municipality on conclusion of the EIA and townplanning processes. This bulk services engineering report, as well as inputs from the EIA and townplanning processes, will form the basis of the SA.
2. "The in-situ materials found on site are adequate for the construction of engineering services and foundations for residential and commercial development.
3. Water:
 - a. The Average Annual Daily Demand (AADD) for the development, in line with accepted design consumptions, assumptions, criteria and standards, is 337kl/day.
 - b. Bulk water is available for this development. A letter of confirmation has been requested from the Mossel Bay Municipality.
 - c. The development is serviced by the new municipal 7Ml Jakkalskop Reservoir, situated centrally on the highest point on the proposed development.
 - d. The new Jakkalskop reservoir feeds into a new 500mm municipal uPVC bulk water line that has recently been constructed along the R102 (MR344) on the south eastern boundary of the development.
 - e. The bulk water connection to the development may be at any of a number of positions, along the new 500mm line. The bulk water connection for the school and hospital will be from a new line along the new access road. The bulk water connection for the tertiary education centre is proposed at a point adjacent to the centre on the R102 (MR344).
4. Sewer:
 - a. The proposed development spans over a number of watersheds and a number of drainage zones are identified. Each zone will be serviced with a gravity sewer network

- and pump station. The primary drainage zone drains towards the southernmost corner of the site adjacent to the R102 (MR344).
- b. The Average Dry Weather Flow (ADWF) of the development, in line with accepted design criteria and standards, is 304kl/d.
 - c. The site is not serviced by a municipal sewer connection or a municipal sewer network in close vicinity.
 - d. A new main sewer pump station (Pump Station 1 – PS1) shall be constructed in the southern corner of the proposed development.
 - e. Sewer will be pumped from here to the Hartenbos Regional WWTW with a new pressure line.
 - f. Hartenbos regional WWTW has sufficient capacity to accommodate the bulk sewer from the development. A letter of confirmation has been requested from the Mossel Bay Municipality.
5. Roads & access
- a. Primary access for phase 1 will be obtained from km2.763 at the existing formalized Hartland Estate access. Secondary access for phase 1 will be obtained from km2.299. Sight distances at these accesses to the development are excellent in both directions in both the horizontal and vertical alignments.
 - b. The necessary applications will be required to be lodged to the Provincial Roads Authority for the formalization of these accesses.
 - c. The access configuration for the accesses onto the R102 (MR344) will trigger right turn lanes on the R102 (MR344).
 - d. A Traffic Impact Assessment (TIA) will be required to be conducted for the development. The TIA will be required to be conducted in line with all provincial and municipal prescriptions and guidelines.
 - e. The provision of public transport facilities like minibus-taxi drop-off facilities to be investigated on the R102 (MR344) at the access points to the development.
 - f. Sufficient parking shall be provided on the SDP of the proposed development in line with all municipal guidelines. Parking shall be provided for disabled persons at all public and/or commercial facilities.
6. Stormwater:
- a. The proposed development spans over a number of watersheds and a number of drainage zones are identified. Each zone will be serviced with a formal stormwater network. The primary drainage zone drains towards the southernmost corner of the site adjacent to the R102 (MR344). The secondary drainage zone drains towards the Little Brak River to the east.
 - b. For the primary drainage area, stormwater will be collected in a detention pond on the lowest point of the site on the southern corner. Stormwater will drain south-west in a dedicated concrete culvert, underneath Monte Christo Road, where it will drain into the existing municipal detention pond on the municipal erf (Ptn 101 of Farm 217). Drainage from the municipal detention pond is into the Hartenbos River. For the secondary drainage area, stormwater will drain directly into the Little Brak River.
 - c. A formal stormwater reticulation system will be provided by a combination of surfaced roadways, kerbs, channels, cut-off drains, stormwater pipes, detention ponds and various minor structures. Energy dissipation will be performed as standard practice with gabion mattresses at all outlets. All pipe outlets will be standard concrete headwalls. Litter traps will be provided at all stormwater outlets and will be cleaned on a regular basis by the estate's landscaping and maintenance teams.
7. Solid waste:
- a. Refuse removal shall be performed by the Mossel Bay Municipality. A dedicated solid waste collection facility shall be provided and designed to the satisfaction of the Mossel Bay municipality. Solid waste removal to be included in- and performed in accordance with a signed services agreement.
8. Electricity:

- a. The bulk electrical services to the development will be provided by the Mossel Bay Municipality from the existing Hartenbos North (11/11kV) Switching Station, which is located along Monte Christo Road, Hartenbos. This substation has recently been constructed by the Mossel Bay Municipality, specifically for providing bulk electrical power to all planned developments within this area.
- b. The Developer will be responsible for the provision of two (2) new 11kV, air-insulated circuit breakers, to be added onto the existing 11kV switchboard within the Hartenbos North (11/11kV) Switching Station. Sufficient space has been allowed for in this substation for the addition of future circuit breakers, which means that the building will not need to be extended. A project has already been initiated by the Developer as part of the provision of the Bulk Electrical (MV) Supply to the Hartland 1 development for the installation of the two (2) new circuit breakers within the Hartenbos Noord Substation. The same circuit breakers will be used to also supply the Hartland 2 development.
- c. From the new 11kV circuit breakers, the Developer will be responsible for the installation of an 11kV underground cable ring network to the erf boundary of the planned development. A project has already been initiated by the Developer as part of the provision of the Bulk Electrical (MV) Supply to the Hartland 1 development for the installation of 1x 11kV, 150 mm², 3-core, Copper, PILC cable (rated 280A, 5.4 MVA @ 11kV) along the Western Access Road. As part of this project, a second 11kV cable (with the same rating and a length of 300m) will be installed in the same trench from the Hartenbos Noord Substation to the Monte Christo / R102 crossing and then turning east along the R102 in the direction of the new Hartland 2 development and will be left coiled and energized in the trench, until such time as the new development is constructed and the bulk supply being required.
- d. A new 4-way Ring Main Unit (RMU), which will also be supplied by the Developer, will serve as the main supply (and metering) point, from where the rest of the development's medium and low voltage networks will be supplied. The proposed position of this new RMU will be in close proximity to the main entrance to the development. Once the new RMU has been installed, the final sections of 11kV, 150 mm², 3-core, Copper, PILC cable between the RMU's for Hartland 1 and Hartland 2 developments will be installed to complete the ring network from the Hartenbos Noord Substation to the two Hartland developments. This ring network will be dedicated for the Hartland developments and will not be shared with other future developments in the area.
- e. The estimated After Diversity Maximum Demand (ADMD) for the entire development, catering for all the different categories as well as some general electrical load (street lighting, public lighting, pump stations, etc.), as per accepted design assumptions, criteria and standards, is estimated to be 1.7 MVA. This capacity is currently available at the Hartenbos North (11/11kV) Switching Station. A confirmation letter has been requested from the Mossel Bay Municipality.
- f. The internal MV reticulation will be in the form of an underground cable ring network, connecting to various mini-substations, strategically located throughout the estate. The developer will be responsible for the installation of the MV infrastructure from the bulk connection point (ring main unit).
- g. An internal low voltage reticulation network will be provided from the minisubs to standard street-front kiosks. All LV cabling and service connections will be installed underground.
- h. Decorative and energy saving street lighting will be provided for the development and will be supplied from the closest minisub. Streetlights will be controlled via day-night sensors and switches.
- i. A data reticulation sleeve network will be provided.

It can holistically be concluded that the proposed development can be designed and constructed to acceptable specifications and standards from an engineering design perspective.”

4.8 Construction Phase

The three development components will be developed in phases as applied for and as shown on Plan No. HB/C/211-2.

5. DEVELOPMENT PROPOSAL

5.1 Application

The application provides for the subdivision of Remainder Farm Vaale Valley No. 219 in two portions of which the smaller portion thereof, viz. ±26.831ha, is earmarked for the proposed development of social facilities. The remaining ±338ha of the property will continue to be utilised for agricultural purposes in the interim thereby ensuring the sustainable use of productive land and preventing premature urban sprawl. This approach is in line with the Municipality’s growth management strategy and long-term spatial planning objectives, which provide for the future release of such land for urban expansion only when justified by demonstrated need and infrastructure capacity. The rezoning of this smaller portion from Agricultural Zone I to a Subdivisional Area will facilitate the development thereof in phases

Phases A, B and C will be used for the development of a Medical Clinic (Community Zone III), a Secondary School and a University (both Community Zone I) respectively, while Phases D and E will be Public Roads (Transport Zone II). See Plan No. HB/C/211-2.

The proposed phasing of the road construction is designed to allow for practical and efficient implementation based on the immediate need to support the associated land uses now being applied for. This approach ensures that infrastructure development aligns with the functional demands of each phase, preventing unnecessary delays and enabling the timely occupation and operation of the respective land use components. It also provides flexibility to prioritise specific road portions in accordance with the urgency and sequencing of the proposed development.

5.2 Factors influencing the layout:

5.2.1 Access:

The two proposed points of access to the R102 consist of the existing access to Remainder Farm 219, located opposite the current N2 subway connection to Hartland Lifestyle Estate and a proposed new access positioned opposite the Swanns Nursery entrance to the R102. These two access points will be interconnected by a circular route linking them on both sides and converging at a planned traffic circle. In future access will also be provided from this traffic circle to the remaining portion of Remainder Farm 219 not included in the current application.

At present, it is uncertain which of the phases will be developed first or whether they will proceed simultaneously.

5.2.2 Topography:

The topographical features of the terrain, with special reference to the two natural drainage courses traversing it, had a determining influence on not only the layout and positioning of structures, etc. as indicated on Site Development Plan, but also the layout of the road pattern. Therefore, the low lying areas are proposed for sports fields and landscaped areas which are not affected by perennial wet conditions.

The layout of the proposed circular road was largely dictated by the topography with the traffic circle positioned on a gentler slope to reduce cut-and-fill requirements during the construction thereof.

The alignment of the western section of the circular route (Phase E), extending from the traffic circle to its connection with the R102 opposite the nursery access, was deliberately adjusted to follow the natural contours. This design facilitates the diversion of stormwater from higher-lying areas and main watercourse in the south-western corner of the site thereby reducing stormwater runoff onto Phase B, where the school is proposed.

6. SUMMARY OF SITE SPECIFICS

6.1 Legislative Context

6.1.1 Legal Framework: SPLUMA and SDF Amendments

Under the Spatial Planning and Land Use Management Act, 2013 (SPLUMA), and the Municipal Planning By-Law (as adopted by the Mossel Bay Municipality), the Spatial Development Framework (MSDF) provides policy guidance – it is not a zoning scheme and it does not confer or remove land use rights.

Section 22.(2) of SPLUMA specifically states that:

“A Municipal Planning Tribunal may approve a land development application which is not consistent with the Municipal Spatial Development Framework, in site-specific circumstances justify a deviation from the provisions of such framework”.

This clause explicitly empowers the decision-making authority to consider and approve deviations without requiring a formal amendment of the MSDF – provided that sufficient site-specific motivation and justification are presented.

6.1.2 Role of the Municipality

While the Municipality has discretion to guide or request alignment with the MSDF, it cannot compel a development to apply for a formal amendment of the MSDF where:

- The proposed development involves only a small portion of a property;
- The deviation is site-specific and can be adequately justified; and
- The application does not alter the overall spatial structure or intent of the MSDF.

In such cases, the correct and legally sound mechanism is to rely on Section 22.(2) of SPLUMA, rather than initiating an MSDF amendment process (which is strategic and policy-level in nature).

6.1.3 Practical Interpretation: Urban Edge Context

The urban edge is a spatial planning instrument intended to manage growth and protect rural/agricultural land – but it is also recognised as a policy line, not an immutable legal boundary.

Where the development proposal:

- Lies immediately adjacent to the existing urban edge;
- Demonstrates clear public benefit (e.g. social facilities, healthcare, education); and
- Does not compromise environmental or agricultural integrity.

the Tribunal or Municipality may legitimately consider such an application under Section 22.(2), based on site-specific merit rather than requiring a formal MSDF amendment.

6.1.4 Summary

Aspect	SDF Amendment	Section 22.(2) Deviation
Purpose	Strategic long-term policy change	Site-Specific case-by-case consideration
Process	Lengthy, Policy-Level amendment	Addressed written normal land use application
Applicability	Large-scale changes or shifts in growth direction	Small-scale proposals with localised impact
Authority	Municipal Council Approval	Municipal Planning Tribunal
Legality	Required only if proposal changes	Legally valid if justified

CONCLUSION

In this case, the Mossel Bay Municipality cannot compel the developer to apply for a formal SDF-amendment when the proposal affects only a small portion of land just outside the urban edge, provided that:

- The application is properly motivated in terms of site-specific factors;
- It demonstrates public benefit and alignment with the broader intent of the MSDF and WCSDF; and
- It is submitted in terms of Section 22.(2) of SPLUMA for the Municipality's consideration.

A site-specific deviation under Section 22.(2) is legally appropriate and procedurally efficient mechanism in this instance as motivated in this report.

6.2 Summary of Justification for deviation from MSDF in terms of Section 22.(2) of SPLUMA.

- The proposed development of a hospital, secondary school and university on a small portion of Remainder Farm No. 219, located just outside the urban edge represents a strategically justified site-specific intervention in terms of Section 22.(2) of SPLUMA. The site is highly accessible from the R102 as well as the N2 and well-positioned within the eastern growth corridor of Mossel Bay providing optimal accessibility to the fast-developing surrounding neighbourhoods such as Hartland Lifestyle Estate, Hartenbos Landgoed, Outeniquasbosch, Monte Christo, Mystic Views and New Vintage as well as the seaside towns further east to Glentana, Friemersheim and the agricultural hinterland [SPLUMA 57(a): Spatial Justice]. Its location ensures that these essential social facilities can serve a wide and growing catchment area in an efficient and integrated manner (WCSDf Policy R2: Integrated Settlement Planning).
- Spatially, the site forms a logical infill opportunity, framed by existing and approved urban developments on two sides thereof, Kleinbrak River on the third and the restrictive hilly natural vegetated area at the back, which serves as a distinct natural edge [SPLUMA 57(c): Spatial Efficiency]. The proposed land uses will therefore consolidate and strengthen the existing urban structure rather than promote urban sprawl [SPLUMA 57(b): Spatial Sustainability]. The grouping of the three complimentary facilities will create a coherent, high impact social service node, unlocking significant cumulative benefits through shared access, coordinated infrastructure provision and the creation of a functional public service core that supports long-term urban efficiency and accessibility [WCPSDF Policy R1: Spatial Efficiency].
- From a socio-economic perspective, the development addresses a critical shortage of social infrastructure rather than creating additional demand [SPLUMA 57(d): Social and Economic Development]. Existing secondary schools in Mossel Bay are operating beyond capacity and available healthcare facilities are insufficient to serve the growing population of Mossel Bay East. The proposed development will therefore fulfil an urgent need for accessible education and healthcare facilities, contributing directly to social equity and improved quality of life for surrounding communities [SPLUMA 57(a): Spatial Justice]. Importantly, all bulk services like water, sewerage and electricity, are available or can be readily extended from nearby networks. The development will also contribute proportionally to the cost of municipal infrastructure, including the Jakkalskop Water Reservoir, thereby assisting the Municipality in receiving capital investment and ensuring long-term financial sustainability of service provision [SPLUMA 57(f): Efficiency].
- A further and highly significant consideration is that the clustering of all three social facilities within an integrated development node holds greater long-term benefits for the growth and functionality of the Greater Mossel Bay area than the establishment of any single facility in isolation [WCSDf Policy R2 and R3: Integrated Settlement Planning and Social Facilities]. The synergies between the hospital, school and university will support enhanced services,

complimentary land uses and a wider service catchment, ensuring long-term operational efficiency and regional sustainability. In contrast, a stand-alone facility located in an area with a limited hinterland and restricted access – such as Aalwyndal and Dana Bay, which are served by only one entrance road and are in relatively close proximity to existing facilities like Bayview Hospital and Point High School – would be hampered by accessibility constraints and a smaller service area. The proposed clustered development therefore represents a more strategic, sustainable and regionally beneficial spatial solution aligned with the Municipality’s broader development objectives [SPLUMA 57(c) and 57(g): Spatial Efficiency and Good Administration] as supported by the following key considerations:

- The proposed node of essential social services for the community not only prevents unnecessary additional traffic volumes on over-congested roads with eventual cost implications for Council related to the upgrading of such roads and the associated frustration for other road users, on especially Louis Fourie Road, but also provides the following additional benefits:
 - **Improved emergency response times.**
A local hospital significantly reduces travel distances for emergency medical cases, improving survival rates and overall community health outcomes;
 - **Enhanced educational accessibility.**
Having a school and university within close proximity removes barriers to education, reduces travel costs related to education and sports facilities for families and encourages higher participation in schooling and tertiary learning;
 - **Economic stimulation and job creation.**
Such a node becomes a major employment generation for educators, medical professionals, support staff, service providers and stimulates secondary economic activity such as retail, accommodation and transport services – the close proximity of the node to the new regional shopping centre will further reinforce and stimulate local economic activity;
 - **Strengthen rural integration.**
Residents of rural farms and settlements to the north-east as well as Sonskynvallei and the Brandwag Hinterland gain fair and practical access to services otherwise concentrated near the urban core, supporting balanced regional development;
 - **Reduced carbon emissions.**
Shorter travel distances for thousands of trips translate into a meaningful reduction in vehicle emissions, supporting Municipal climate-responsibility objectives;
 - **Improved social cohesion and community well-being.**
Clustering essential services creates a central, accessible community hub, improving social interaction, sense of belonging and overall quality of life;
 - **Increased property values and investment confidence.**
Proximity to high-quality education and healthcare facilities typically elevates property desirability, strengthens market confidence and encourages further private-sector investment;
 - **Better utilisation of existing northern mobility corridors.**
Development in this area eases pressure on the east-west coastal corridors and encourages more balanced utilisation of the regional road network; and
 - **Long-term Municipal cost efficiency.**
By decentralising services and reducing travel demand, the Municipality can delay or avoid expensive expansions to major arterials and intersections.
- It is also noted that the Municipality has suggested that alternative sites within the current urban edge could accommodate these facilities. However, none of the properties identified in the Municipality’s list are, as discussed in par. 4.2.10.2, of sufficient size to accommodate all three land uses in a functional and integrated manner, nor are they suitably located to provide a service area that meets the needs of the broader Mossel Bay East catchment where the acute demand for such facilities exists. The real need for such facilities exist closer to the expanding residential communities along the eastern development corridor. The proposed site, being strategically positioned in proximity to these areas, is therefore best suited to address the actual demand and ensure accessibility for the intended user population.

The inability of these alternative sites to accommodate the full scale and operational requirements of the proposed development further underscores the justification for the site-specific deviation [SPLUMA 57(b) and 57(c): Spatial Sustainability and Efficiency].

- The proposal aligns fully with the principles and objectives of SPLUMA, promoting spatial justice, sustainability, efficiency and resilience [SPLUMA 57 (a-g)]. It further supports the strategic direction of the Mossel Bay Municipal Spatial Development Framework (MSDF), which identifies this area as part of the logical expansion direction of the urban edge to accommodate further social and economic development [MSDF Policy 4.2: Urban Edge Expansion]. The development will therefore not undermine, but rather advance the Municipality’s long-term spatial vision by reinforcing the existing settlement structure with essential community facilities in a highly accessible and environmentally contained location.
- In addition, the proposal is consistent with the strategic objectives of the Western Cape Provincial Spatial Development Framework (WCSDF), particularly those promoting integrated settlement planning, spatial efficiency and equitable access to social services [WCSDF Policy R1: Spatial Efficiency; R2: Integrated Settlement Planning; R3L Social Facilities]. By clustering the educational and healthcare facilities within a well-located and infrastructure-supported node, the development contributes to sustainable growth patterns and strengthening of rural-urban linkages. It therefore represents a development outcome that upholds the spatial development goals of both the Municipality and the Province, justifying approval of the site-specific deviation in terms of Section 22(2) of SPLUMA in the broader public interest.

Policy Reference Table: Site Specific Deviation Motivation:

Paragraph/ Key Consideration	Relevant SPLUMA Principle(s)
Strategic location and accessibility to surrounding neighbourhoods and hinterland	57(c): Spatial Efficiency 57(b): Spatial Sustainability
Clustering of Hospital, School and University for cumulative benefits	57(c): Spatial Efficiency 57(g): Good Administration
Addressing social infrastructure shortage (education and healthcare) and existing service gaps	57(d): Socio and Economic Development 57(a): Spatial Justice
Availability and Contribution to bulk municipal services	57(f): Efficiency
Clustering versus isolated facilities	57(b): Spatial Sustainability 57(c): Spatial Efficiency

7. CONCLUSION

To disregard these clear advantages to the Greater Mossel Bay, as discussed in this report, solely because the proposed development is just outside the urban edge, would be inconsistent with sound forward-looking planning practice and contrary to the intent of both SPLUMA and the Western Cape Spatial Development Framework, which encourage context-responsive development guided by demonstrated local need and long-term sustainability.

Therefore, it is evident that the proposed development of a hospital, secondary school and university, purposefully concentrated within a well-located node, directly addresses not only an existing shortage of essential social facilities, but also an undisputable future growth in demand arising from the continued expansion of the Greater Mossel Bay. The proposal aligns with the principles of spatial justice, spatial efficiency and sustainability and satisfies all relevant site-specific considerations. By delivering significant socio-economic and spatial benefits to the broader community clearly demonstrates its need and desirability. On this basis, the application is warranted for approval.