



STELLENBOSCH MUNICIPALITY
HERITAGE SURVEY

CAPE WINELANDS PROFESSIONAL PRACTICES IN ASSOCIATION

**Final Comments on:
NATIONAL DEPT. OF AGRICULTURE PROPOSED EXCLUSION OF CERTAIN PROPERTIES
FROM THE PROVISIONS OF THE SUBDIVISION OF AGRICULTURAL LAND
ACT, ACT 70 OF 1970
16th April 2018**

1. INTRODUCTION

On the 12th March 2018 we received a request from the Acting Director: Planning and Economic Development of the Stellenbosch Municipality, Mr. Bernabe' de la Bat, to comment on the above indicated proposals. As made available to us, the proposals were not accompanied by any motivation whatsoever. Moreover, because we were not in the possession of all the necessary information relative to Urban Edges, we were not in a position to provide final comment on the proposals and so advised the municipality in both our first Interim comment (dated 27th March 2018) and our second interim comment (dated 3rd April), requesting that we be provided with the necessary information. Finally, with many weeks of delay, in the last few days we have been provided with the information and, hence, we have been able to prepare this final comment report for the Stellenbosch Municipality.

Other consultants to the Stellenbosch Municipality were also invited to comment and Simon Nicks of CNDV, who have been preparing the Rural Area Plan for the municipality, kindly sent us copy of their comments.¹ Because we are in agreement with the CNDV comments, we do refer to them in what follows.

As we have discussed repeatedly from the inception and during the course of this project, protection of agricultural land is central and material to the municipal economy and is significant to both heritage resources management and development policies in the municipality, particularly so in regard to agricultural land that features as significant in the Draft Heritage Resources Inventory (both the earlier January 2017 version and the revised March 2018 one) prepared and made available to the Stellenbosch Municipality and other interested and affected parties. We are of the view that Act 70/1970 is an appropriate and strong deterrent to development proposals relating to agricultural land and, unless there is/are good reason/s, such protection should generally remain in place. However, we also agree with the view that it may be advisable that some parcels of land currently protected by the Act should be excluded from such protection for good development reasons that conform to the Spatial Development Framework (SDF), the Integrated Development Plan in force and other development control instruments.

Obviously, proposals such as these have to strike an appropriate balance between sometimes competing considerations. However, we have a general concern with many of the proposals before us: they neither appear to sufficiently take into account agricultural considerations, nor comply with principles embodied in the Stellenbosch Municipality SDF of November 2012. Indeed and surprisingly,

¹ CNDV e-mails, 14th and 27th March 2018.

some of the proposals before us appear to be in direct conflict with the stated principles, which we support and are as follows:²

- Instead of expanding the footprint of built areas, suitable locations need to be identified either as part of the existing settlements through densification or extension and integration of existing settlements;
- The municipality should be developed as a system of inter-connected, nodal, tightly constrained settlements that have minimal outward expansion ... ;
- The development of settlement locations should be prioritised firstly on rail routes, then secondly on road routes;
- Settlement form should lessen rather than increase the demand for private motor vehicle travel;
- The possibility of constructing more stations on the Lynedoch – Klapmuts rail line should be investigated ... ;
- Development approvals should be guided by the need to achieve the settlement densities needed to make the public transport system financially and operationally viable;
- Subdivisions, second dwellings, sectional title, redevelopment of existing low density areas, infill and brownfield land opportunities should be prioritised over Greenfield sites, as guided by the SDF;
- Land outside of existing and proposed urban settlements should be used for agricultural production, biodiversity conservation, scenic quality and agri-tourism.

We have to record that, on the evidence and for good reasons, we do not agree with many of the proposals that have to do with revisions to Urban Edges (including those for Stellenbosch, Franschhoek, Raithby, Pniel, Lanquedoc, Kylemore and La Motte). We refer the reader to our comments dated 28th April 2017 in that regard, which are further referred to in this document as appropriate.

Our Phase 2b Project Report and associated documents,³ maps and digital material may be viewed via the Stellenbosch Heritage Foundation website: <http://www.stellenboschheritage.co.za/stellenbosch-municipality-heritage-inventory>

Comments on specific properties appear below, in Section 2: The Detailed Comments, appearing in bold text format. Our overarching comments on these proposals appear in Section 3: recommendations.

2. DETAILED COMMENTS AREA BY AREA

Our comments appear sequentially below, area by area, with the CNDV comments included and appearing within quotations (and in italics), footnoted in acknowledgement.

In what follows and in general three figures feature relative to each area under consideration (for convenience, in the sequence as defined by CNDV in terms of their Rural Area Plan): the first is that provided to us, indicating the specific properties involved in the proposals; the second depicts the representation of

² Stellenbosch Municipality Spatial Development Framework, November 2012, pp. 7-17.

³ Cape Winelands Professional Practices in Association (Todeschini and Jansen), "Draft Revised Heritage Inventory of the Tangible Heritage Resources in the Stellenbosch Municipality: Phase 2b Report".

relevant Urban Edges; the third constitutes the appropriate excerpt from our March 2018 Draft Heritage Resources Inventory Synthesis Map.

1. Kromrivier (Valley A) and Klappmuts (Valley I of the Heritage Inventory)

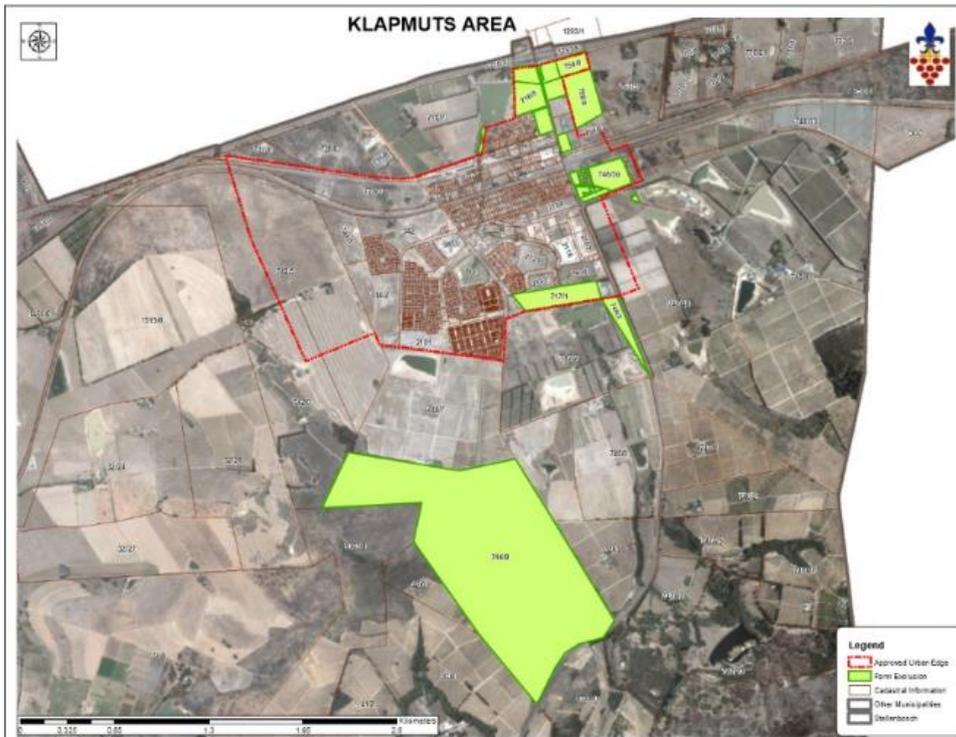


Figure 1.1: Areas proposed for exclusion from Act 70 of 1970 by the Department of Agriculture (areas coded pea-green)

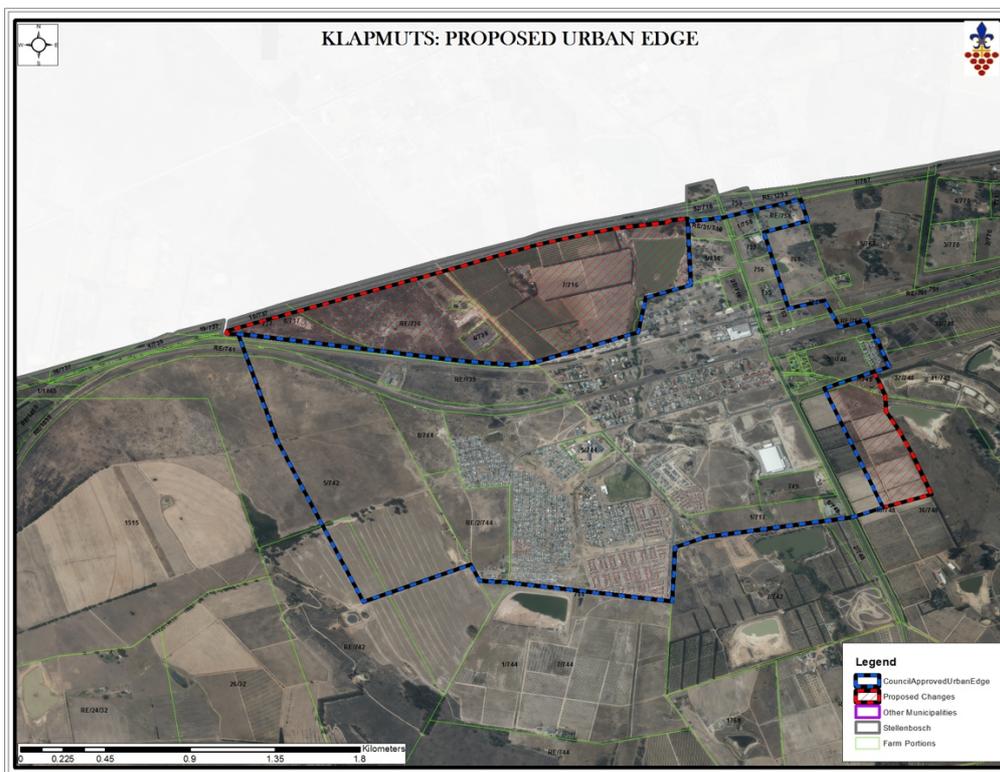


Figure 1.2: Urban Edge, as supplied by the Stellenbosch Municipality

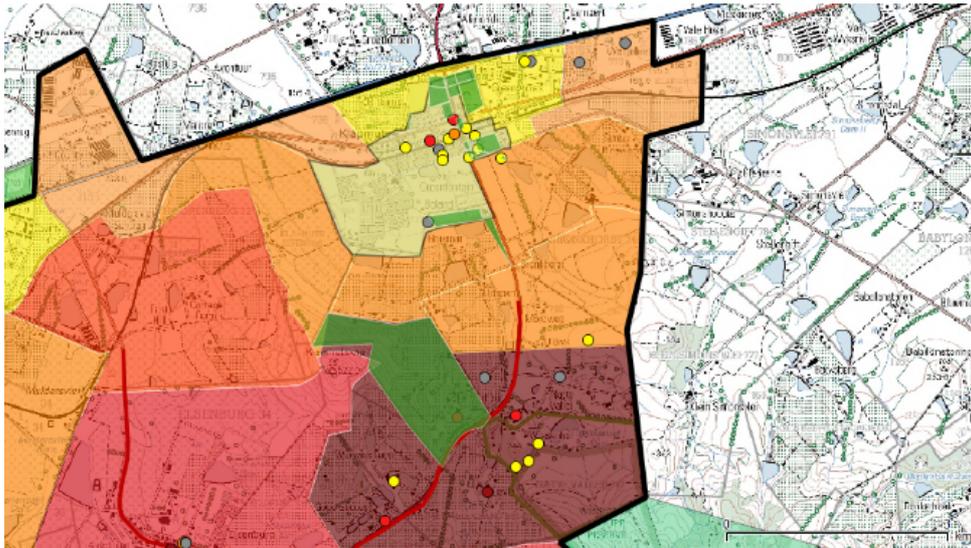


Figure 1.2: Relevant Extract from the CWPPA Phase 2b Draft Inventory of Heritage Resources (areas coded green)

We record that we completely support the municipal policy of wanting to develop Klapmuts as a significant urban node, since it is well served by rail infrastructure, is in a location proximate to good access to the N1, and is connected by a potential corridor (referred to in the prevailing SDF) to the town of Stellenbosch. We also record that, in this instance, the Urban Edge mostly appears to conform to that which we supported in April 2017. Therefore, with a few exceptions, **we support** proposals relative to **the exclusion of certain properties within the Klapmuts Urban Area from Act 70/70.**

1.1 Farm 0/744 – **not to be excluded from Act 70/70** – “much of this land is on slopes steeper than 1:4, comprises Klapmuts Kop nature reserve, is visually prominent and is a key scenic component of the municipality’s rural gateway sense of place with regards to view sheds from the R44 and N1. Thus, this property can be considered a key component of the rural tourism economy. It should be retained for passive low impact tourism activities (hiking and MTB) as an adjunct to tourist accommodation on farms on the lower slopes below, and bio-diversity conservation”.⁴

Part of Landscape Unit Kromrivier A16 (8.85): **Grade II**

Two hills flank the unit: Klapmutskop to the west and Skurweberg to the east. A large part of the landscape unit, especially on the upper slopes of these two hills, features critical biodiversity and ecological support areas. Highly suitable soils for agriculture cover most of the unit, except for the valley associated with Wiesenhof. A broad valley lies between the hills, where the R44 is aligned roughly down the middle and traverses the unit, dividing it roughly in half. The road is considered one of the most beautiful scenic routes in the study area, elegantly displaying natural and cultural features together with dams, plantations and vineyards. On the northern side of the R44, Mitre’s Edge, Le Bonheur and Warwick Wine Estates are located amidst rolling vineyards and vegetated drainage valleys. The vineyards do not have a distinguishable pattern. The foot slopes of the Simonsberg display circular surface features (created by the specific plant species growing there) that refer to ancient

⁴ CNDV comment.

Terminalia, or termite mounds. These, together with the undeveloped foothills and natural vegetation, give the unit a distinct character when entering the scenic route from Klappmuts. One of the oldest and original farms in the area is Natte Valleij. It has an extensive and well-preserved elongated werf and four brandy sills in a mature and interesting garden with werf-walling reminiscent of Elsenberg. Lievland Wine Farm (Beyerskloof), Marklew (Goede Sukses) and Le Bonheur (Wetvreden) are also located in this land unit and contain Cape Dutch and Cape Georgian homesteads of varying degrees of heritage significance. The unit displays some of the more diverse and visually significant landscapes in the study area, with the R44 being considered a highly valued scenic route. The varied landscape features several historic wine farms dotted along the broad valley bottom and at the foot slopes of the two hills flanking the unit. Close to the R44, an intrusive recreational park is being constructed immediately below Wiesenhof.

1.2 Farm 2/748 – **not to be excluded from Act 70/70** – *“ it comprises orchards and vineyards in a key gateway location as the R44 enters Klappmuts. It thereby reinforces this settlement's character as a rural village. It is important that this is not undermined. This could be in danger of happening if further development is permitted. It is already in danger of weakening due to the urban style geometric design and street furniture used in the road upgrading in this area. This property should rather be consolidated with the abutting agricultural land”*.⁵

Part of Landscape Unit I04 (6.0) **Grade IIIB**

The majority of soils in the unit are only moderately or not suitable for agriculture (viticulture). The entire unit is characterised by strong lines of windbreak trees protecting pockets of citrus trees and vineyards. These windbreaks, together with the windbreaks in unit I10, distinctly form the western and southern gateway towards Klappmuts and are therefore some of the most important landscape features that must be retained within the Klappmuts area. A significant feature of this land unit is the fact that it spans the R44 and therefore not only acts as a well-defined buffer to the Klappmuts node, but also a gateway to the Cape Winelands towards Stellenbosch. The windbreaks are considered an important landscape feature to retain. These windbreaks give this landscape unit its function as a gateway and it, therefore, has contextual significance within the larger context of the winelands. It has even more contextual significance being part of the 'belt' system that holds Klappmuts in place.

1.3 Farm 0/758 – **not to be excluded from Act 70/70**. *“It is not clear why this property is included in the Urban Edge. Only properties abutting the R44 should be included in the Urban Edge and should retain their life style, farm shop retail character. Farm 0/758, 0/768 and 0/750 form an important rural interface and gateway when viewed from the N1 thereby reinforcing Klappmuts' rural settlement character. This should not be undermined.*

This property should also be excluded from the Urban Edge”.⁶

Part of Landscape Unit I06 (4.8) **Grade IIIC**

⁵ Ibid.

⁶ Ibid.

This landscape has an agricultural character, with smallholdings, windbreaks and open fields being dominant features. West of the R44, vineyards, a small dam and a newly developed housing estate compares well with the historical Transnet staff village and expansive open fields to the east. The unit features two main drainage lines with ecological support areas and the open fields represent critical biodiversity areas in a natural condition. Klappmuts have moderately suitable soil for agriculture (viticulture).

2. Pniël, Lanquedoc & Kylemore (Valley F of Heritage Inventory)

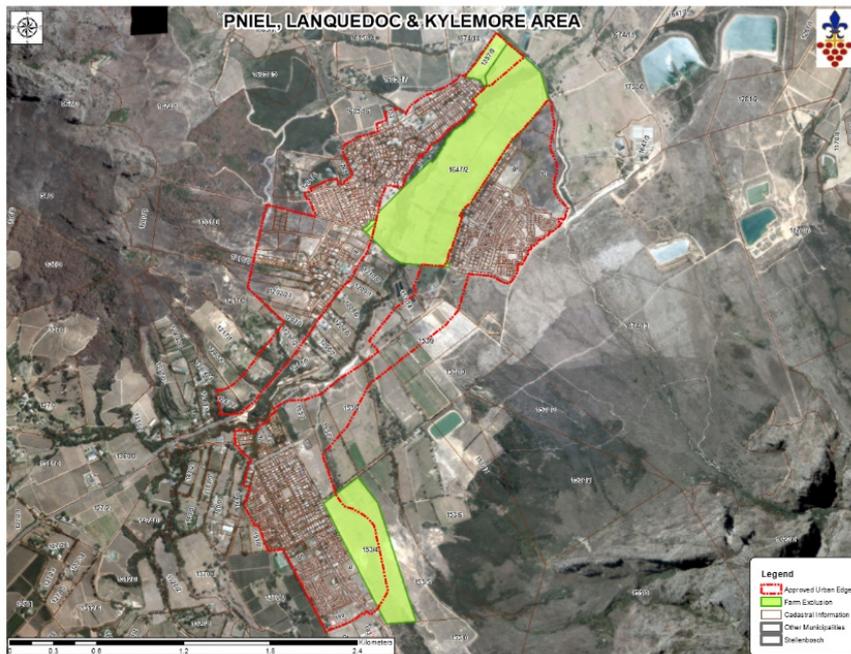


Figure 2.1: Areas proposed for exclusion from Act 70 of 1970 by the Department of Agriculture (areas coded pea-green)

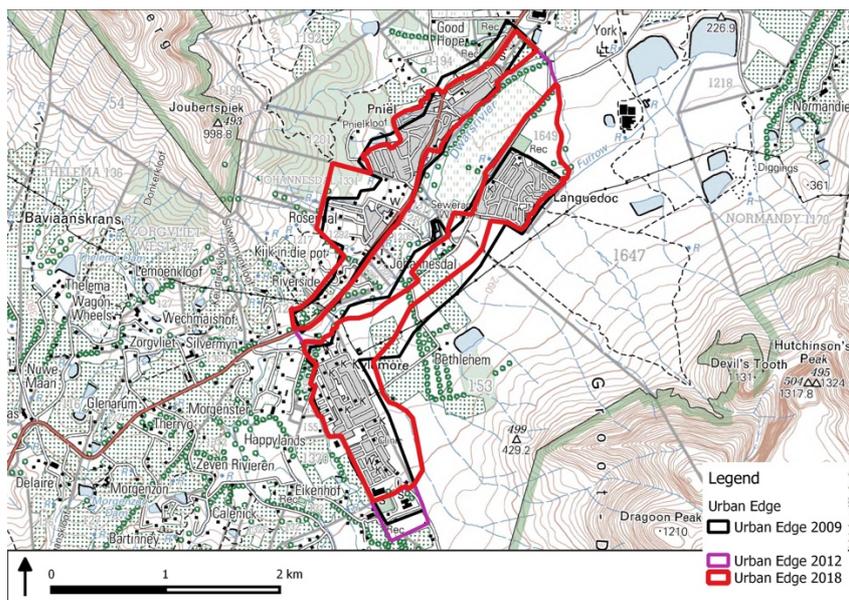


Figure 2.2: Urban Edges as supplied by the Stellenbosch Municipality

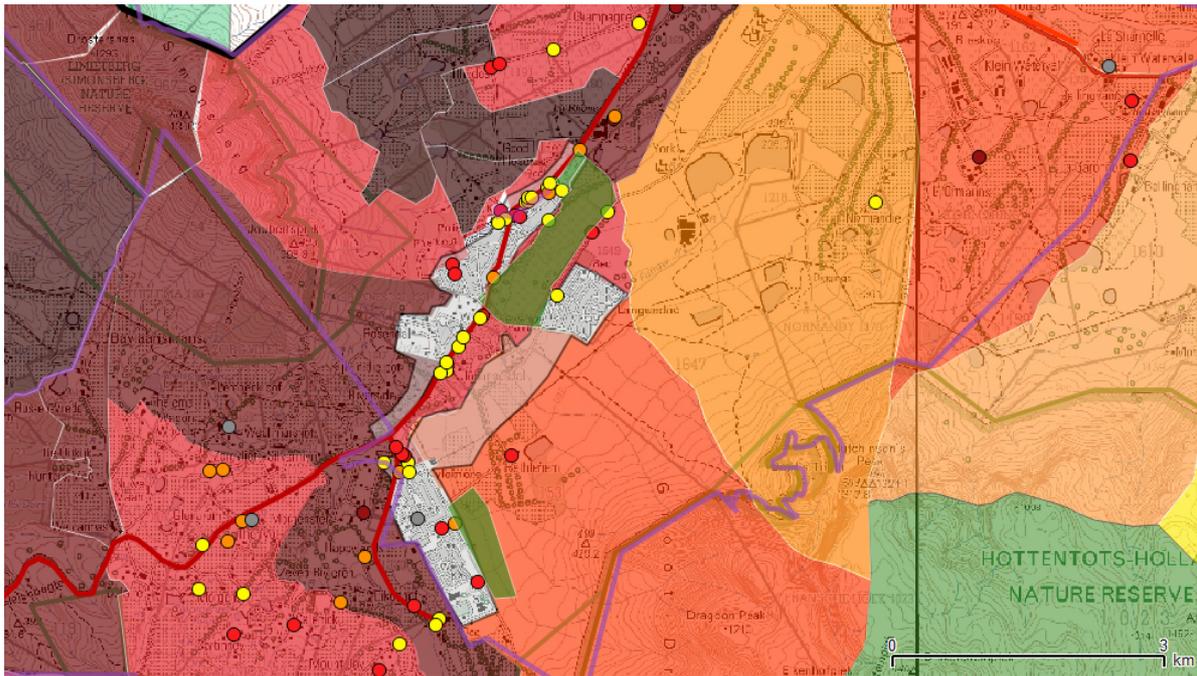


Figure 2.3: Relevant Extract from the CWPPA Phase 2b Draft Inventory of Heritage Resources (areas coded dark green)

We record that we do not agree with the Urban Edge as shown in Figure 2.1, as we commented adversely to the then proposals in April 2017 in that regard, as shown in Figure 2.4, below.

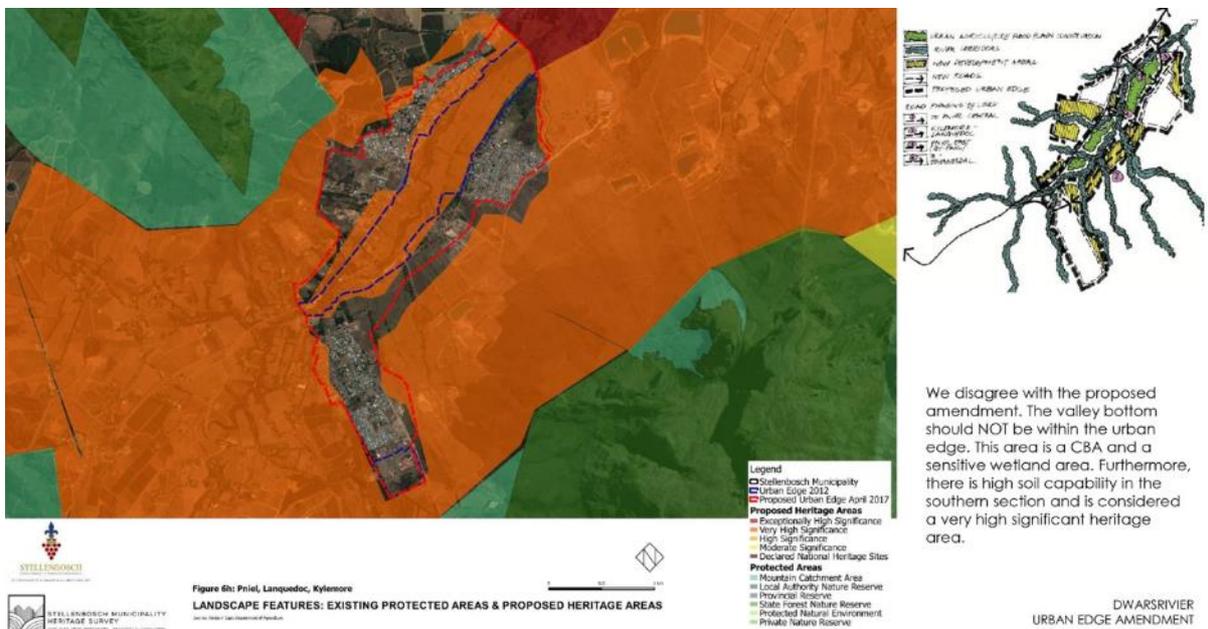


Figure 2.4: Relevant Extract from the CWPPA April 2017 comment on proposed changes to the Urban Edge

2.1 Farm 2/1647 - **not to be excluded from Act 70/70.** "This property comprises vineyards and riparian land along the Dwars river. This riparian corridor should be

kept free from development to the greatest extent possible so as to protect water quality and quantity, particularly given the water stressed state of this area and the importance of this resource for agriculture. Agriculture is a key input into the agriculture, agri-processing and tourism value chains which provide substantial and sustainable economic growth and employment in the area. Agriculture should also be carefully managed in this regard and bank side cultivation avoided. The undeveloped and agriculture character of the Dwars rivier riparian corridor is also a key component of the heritage character and significance of this community. It has been farming and living here since time immemorial. The R310, which is proposed as a grade II Heritage route, also passes through the centre of this property as a public transport and non-motorised transport route. Its rural and historic character should be protected to the greatest extent possible".⁷

Part of Landscape Unit F09 (8.3) **Grade IIIA**

The entirety of this land unit is located on the floodplain of the Dwarsrivier and is therefore low-lying and largely flat, draining towards the river itself. It features several ecological support areas along the drainage lines and river. The soils are highly suitable for agriculture (viticulture) across the entire unit. It features extensive vineyards and agricultural fields along the lush banks of the river. It also features the Pniël campgrounds and the settlement of Johannesdal. The unit is bounded on the northwest by Pniël and the Helshoogte Road (R310). The agricultural fields are visible from the Helshoogte Road (R310) and Pniël and are beautifully framed by the Drakenstein mountains behind. From Lanquedoc, the views over the fields terminate in the Simonsberg.

The Dwarsrivier River floodplain is rich in intangible and tangible cultural heritage, especially associated with the communities of Pniël, Kylemore and Lanquedoc. The views over this agrarian and mountainous landscape from these villages largely determine their remaining agrarian character. It therefore has a high level of heritage, aesthetic, and technical significance in addition to its environmental significance.

2.2 Farm 4/153 – **not to be excluded from Act 70/70 until the western portion east of the river tributary and outside of the urban edge has been subdivided off and consolidated with the adjacent property.** *"The river tributary forms an appropriate edge to the existing settlement. This leaves a significant amount of land available for development between "Kerk street extension" and the river tributary. Such subdivision should also include an significant riparian set back line of at least 32m or as otherwise determined by a fresh water ecologist".⁸*

Part of Landscape Unit F08 (7.55) **Grade IIIA**

The Die Bordjie Outspan presents large tracts of critical biodiversity areas in a natural condition and ecological support areas along the drainage lines. The area to the west features excellent soil suitability for agriculture (viticulture). The area between Lanquedoc and Kylemore is characterised by agricultural fields (fallow or worked) and vineyards. The agricultural fields and avenues of Bethlehem are visible from the Helshoogte Road (R310) and are beautifully framed by the Drakenstein mountains behind. The views over this agrarian and mountainous landscape from Pniël,

⁷ Ibid.

⁸ Ibid.

Lanquedoc and Kylemore largely determine their picturesque character. Incorporating an early freehold grant, the farm of Bethlehem comprises Cape Dutch and Victorian buildings, two Oak avenues, and vast agricultural holdings that are semi-derelict. It is currently being renovated. This unit features highly significant critical biodiversity and ecological support areas that contribute to its value. It bestows significant scenic qualities to the settlements of Pniël, Kylemore and Lanquedoc.

3. Franschhoek (Valley H of Heritage Inventory)

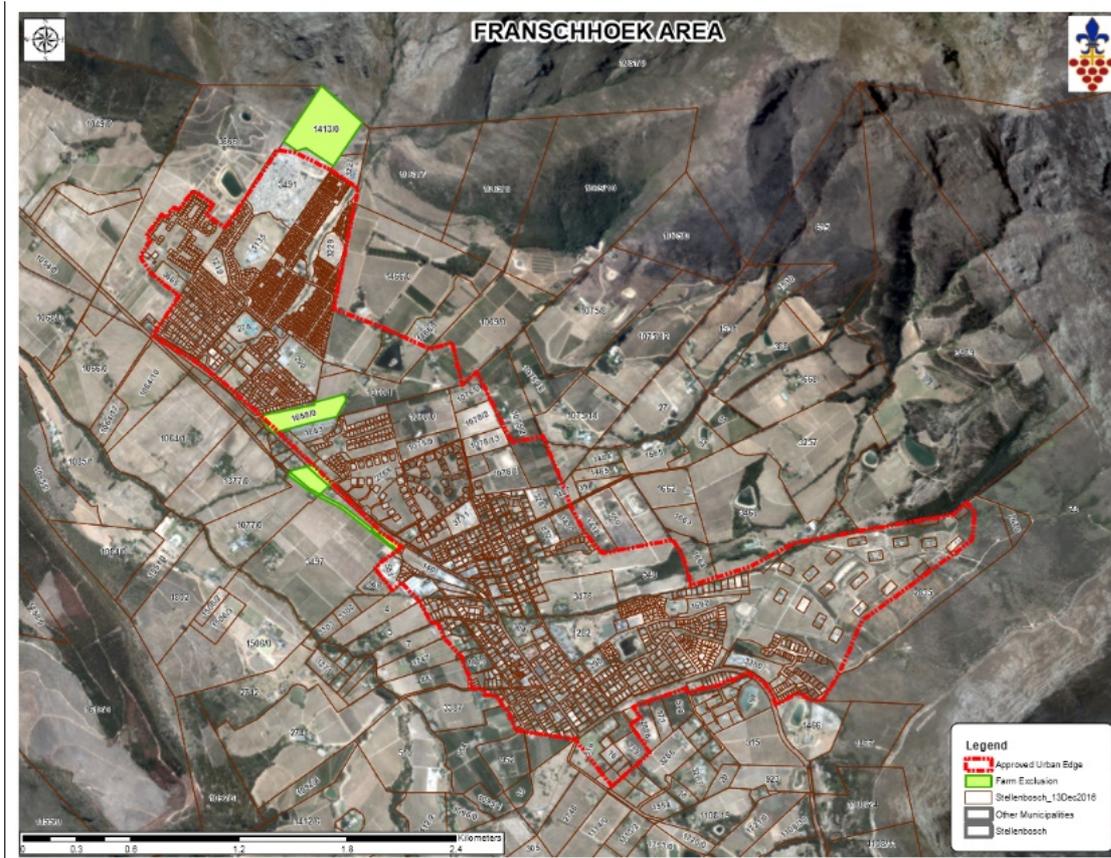


Figure 3.1: Areas proposed for exclusion from Act 70 of 1970 by the Department of Agriculture (areas coded pea-green)

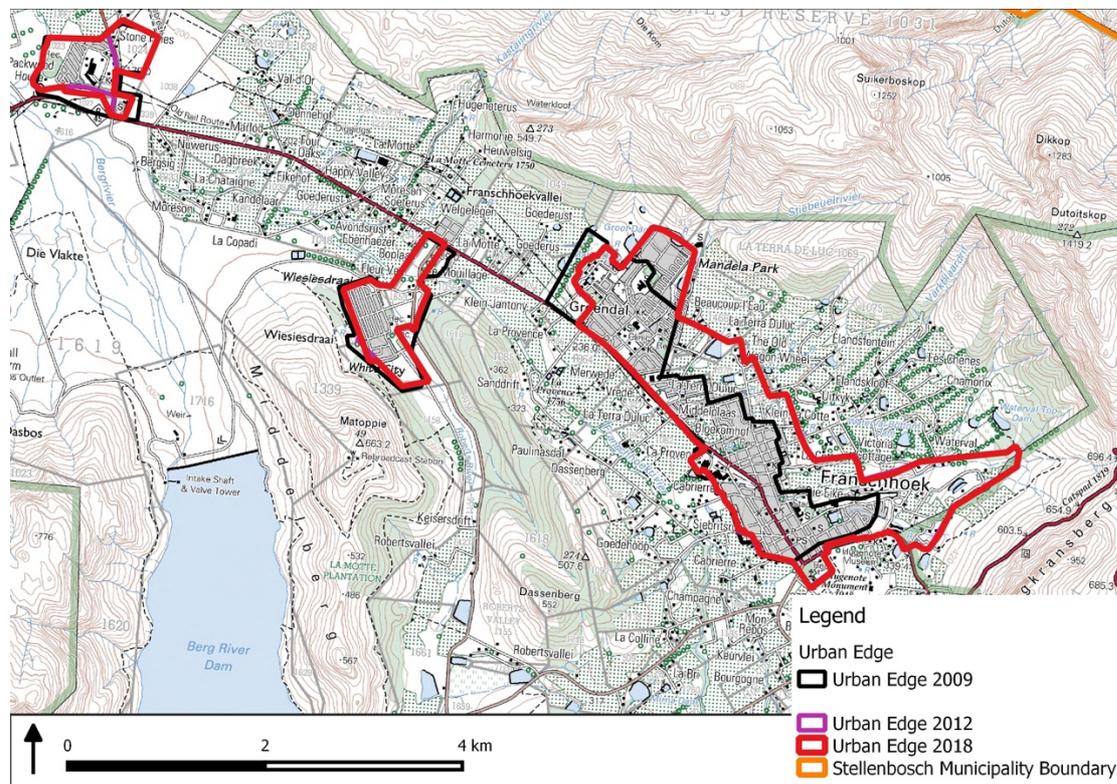


Figure 3.2: Urban Edges, as supplied by the Stellenbosch Municipality

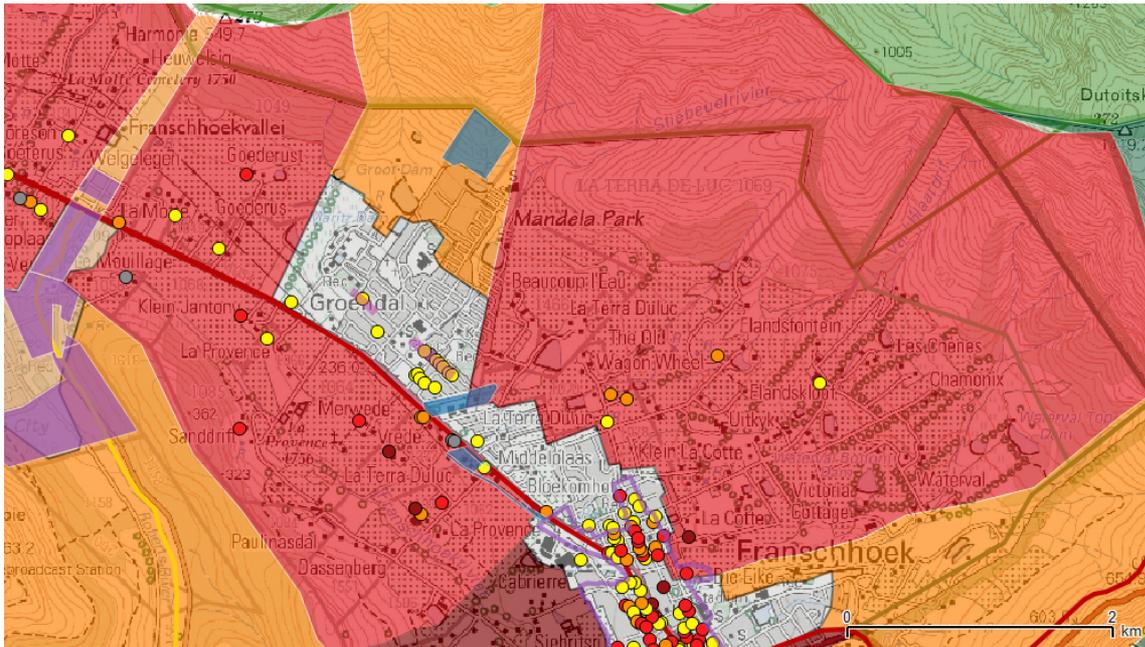


Figure 3.3: Relevant Extract from the CWPPA Phase 2b Draft Inventory of Heritage Resources

We do not agree with the Urban Edge as shown in Figure 3.1, as we commented adversely to the then proposals in April 2017 in that regard, as shown in Figure 3.4, below. We strongly urge that the Urban Edge in Franschhoek be reviewed.

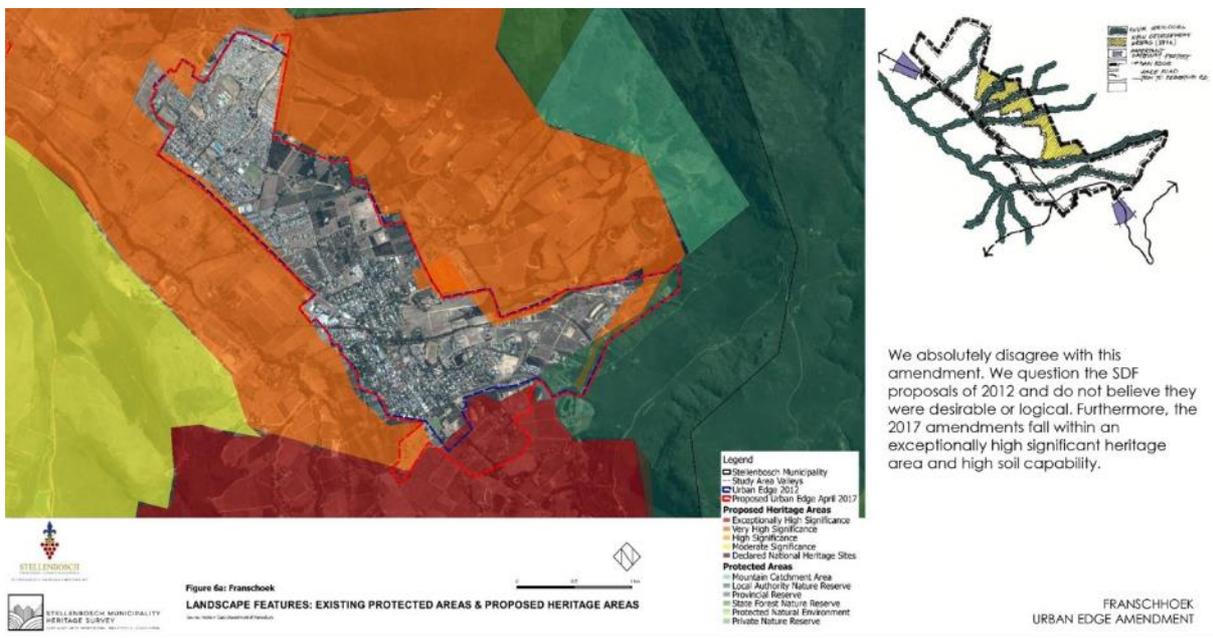


Figure 3.4: Relevant Extract from our April 2017 comments on the then Urban Edge proposals

3.1 Farm 0/1413 – **not to be excluded from Act 70/70.** *“This property is on steep slopes greater than 1:4, in an Ecological Support Area with respect to biodiversity conservation and is on highly visually exposed mountain slopes above the*

Talus line. It is also located at one of the furthest points in Franschhoek north and thus is poorly located in relation to the main R45 activity corridor".⁹

Part of Landscape Unit H05 (6.2) **Grade IIIB**

The Wemmershoek Mountains, with Suikerboskop, form the backdrop to this land unit that mainly consists of greater Groendal and the informal settlement of Langrug. The open land on the upper reaches has a layer of critical biodiversity still in a natural state, while Langrug is developed on a former ecological support area. The critical biodiversity area is defined by large dirt roads and an irrigation dam. Furthermore, the soils on the upper parts of Groendal and Langrug are some of the most suitable for agriculture in the area. The visually intrusive settlements of upper Groendal and Langrug can be seen from a distance on the road from Stellenbosch to Franschhoek (R45). Here, development was allowed without any consideration of its wider context within the Franschhoek Valley. Houses are built on the highest foothills and there is no spatial reference to the agricultural practices characteristic of the area. The reflection of light from corrugated-iron structures results in visual disturbance. The significance of this landscape unit has been greatly compromised by the unprecedented density of the Langrug settlement that has crept into the plantation buffer zone between wilderness and peri-urban plots.

3.2 Ptn of Farm 1077 between rail line and R45. – **not to be excluded from Act 70/70.** *"This property is currently outside of the urban edge, is located on very good agricultural land, is occupied by vineyards and tree avenues which are an important component of the rural gateway character when entering Franschhoek. Furthermore, this property should remain part of the parent property to west of the rail line and should not be subdivided off".¹⁰*

Part of Landscape Unit H06 (8.05) **Grade IIIA**

The river plain with its tree belt forms a distinct edge between Dassenberg and the vineyards below. This belt of trees is a continuous line that flows from the 'natural fingers' on the mountain slopes in unit H01. A strong pattern of settlement is seen along the Franschhoek River with numerous heritage-worthy structures as part of this pattern. These include Grande Provence main house, Klein La Provence, a villa at the entrance to Grande Provence, Ricketty Bridge and a few workers' cottages. The significance of this landscape is in the linear pattern of settlement special to the Cape Winelands. Any large-scale development undertaken against the grain and size of this pattern would have a degrading effect on the larger cultural landscape. It is important that view lines are left undisturbed across the floodplain area towards the mountains.

⁹ Ibid.

¹⁰ Ibid.

4. La Motte (Valley H of Heritage Inventory)

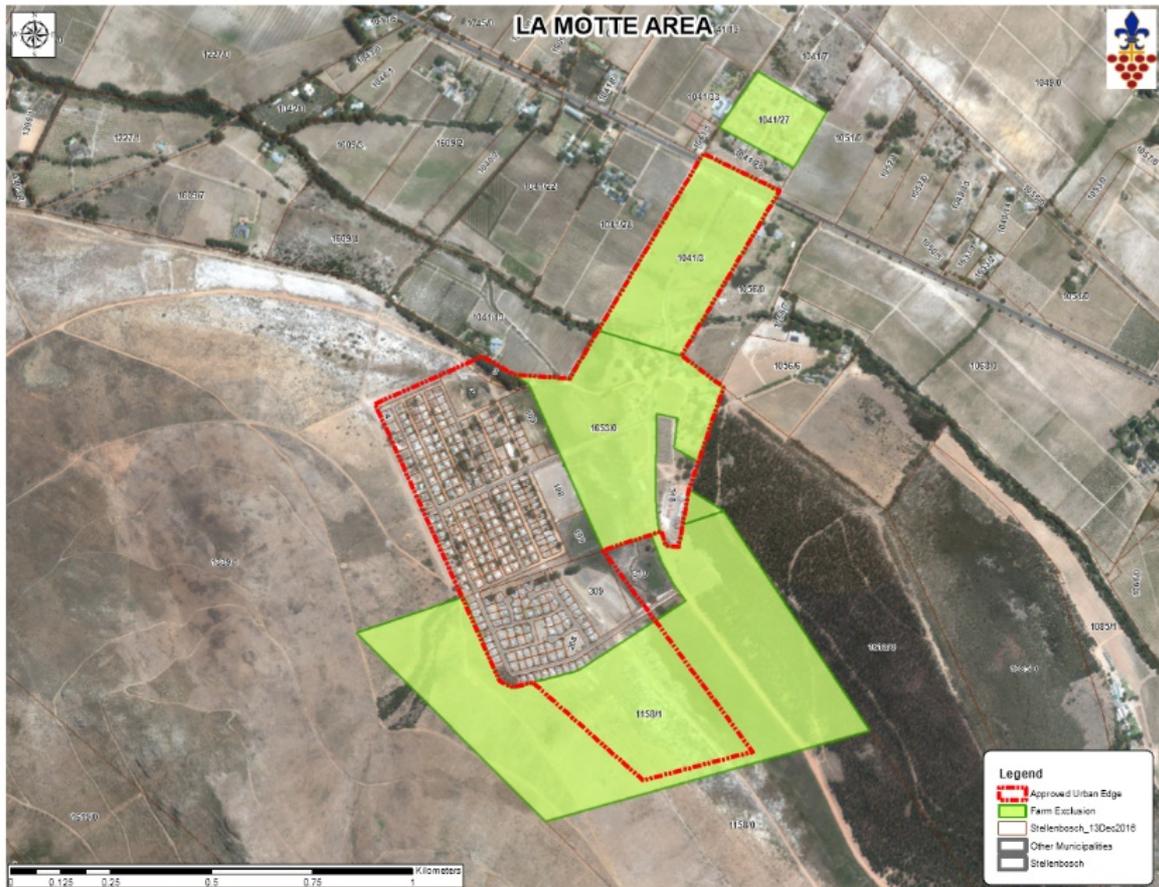


Figure 4.1: Areas proposed for exclusion from Act 70 of 1970 by the Department of Agriculture (areas coded pea-green)

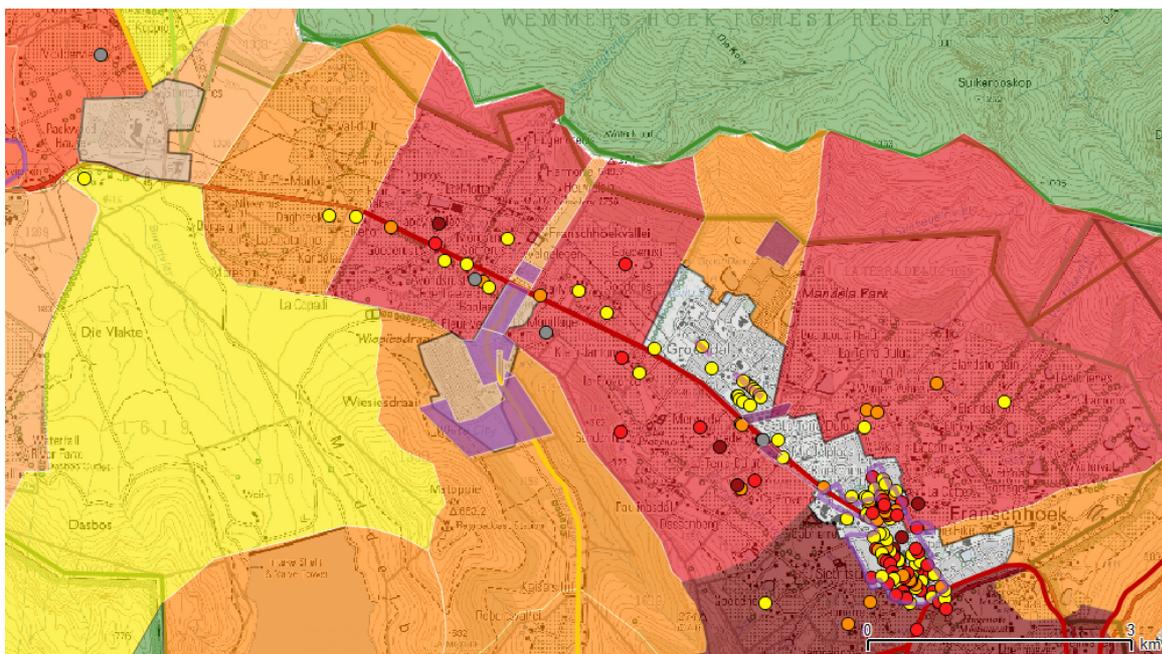


Figure 4.2: Relevant Extract from the CWPPA Phase 2b Draft Inventory of Heritage Resources (areas coded lilac)

We do not agree with the Urban Edge as shown in Figure 4.1, as we commented adversely to the then proposals in April 2017 in that regard, as shown in Figure 4.3, below.



Figure 4.3: Relevant Extract from our April 2017 comments on the then Urban Edge proposals

4.1 “Farm 27/1041 already contains a suburban style development comprising former managers houses on an undivided property belonging to the former dept of Forestry. It was previously proposed to be included inside the Urban Edge. Thus, it could contribute to creating a rural village node straddling the R45 as it approached Franschhoek. This proposal was turned down and it was proposed this property be excluded from the Urban Edge. It cannot be farmed due to the improvements on it. This property could be excluded from Act 70/70 if the Urban Edge is amended to include it”.¹¹

Part of Landscape Unit H07 (5.35) **Grade IIIB**

This land unit is a deviation from the rest of the landscape units in Franschhoek. It consists of a thin strip of open fallow land that stretches from the apex of the Wemmershoek Mountains, over the R45, to the floodplains of the Franschhoek River. The Robertsvlei Road joins the R45 in this location, with a small cluster of workers’ houses associated with the plantation industry. It is an interesting break from the rest of the agricultural typology of vineyards in the area. Furthermore, most of the soils south of the R45 and a large percentage of the soils to the north of it are highly suitable for agriculture. A degraded critical biodiversity area is found behind La Motte village, which coincides with a strip of early freehold land grants. One of the old plantation settlements is located adjacent to the R45. The landscape of Franschhoek was known for its plantations, that started as part of a job creation programme in the early 20th century. The land unit is criss-crossed by numerous footpaths leading from the settlement to the top of the mountain, and half-built structures add to the sense of neglect and disuse.

¹¹ Ibid.

4.2 Farm 1/1158 - **those portions of this property outside of the Urban Edge not to be excluded from Act 70/70.** *"This property should be subdivided into three portions under agricultural zoning.*

The southern portion west of the urban edge lies on a Critical Biodiversity Area proposed to become part of a protected area including all of Middelburg hill and linking with the Berg River dam to the west. These slopes are visually exposed and form an important component of the rural, scenic, secondary valley through which the Robertsvlei Road passes.

The eastern portion comprises good agricultural land suitable for forestry or vineyards and this land use should remain intact because of its importance as an input into the agricultural, agri-processing, especially structural timber, and tourism value chains".¹²

Part of Landscape Unit H15 (6.45) **Grade IIIB**

This land unit is situated between the Dassenberg and Middelberg Mountains, with the Robertsvlei Road traversing centrally between them. Areas of critical biodiversity in natural condition are found in this land unit and are a valuable asset where they have not yet been disturbed by plantations. Most of the soils are of a moderate to high suitability for agriculture.

¹² Ibid.

5. Lyndedoch (Valley C of Heritage Inventory)

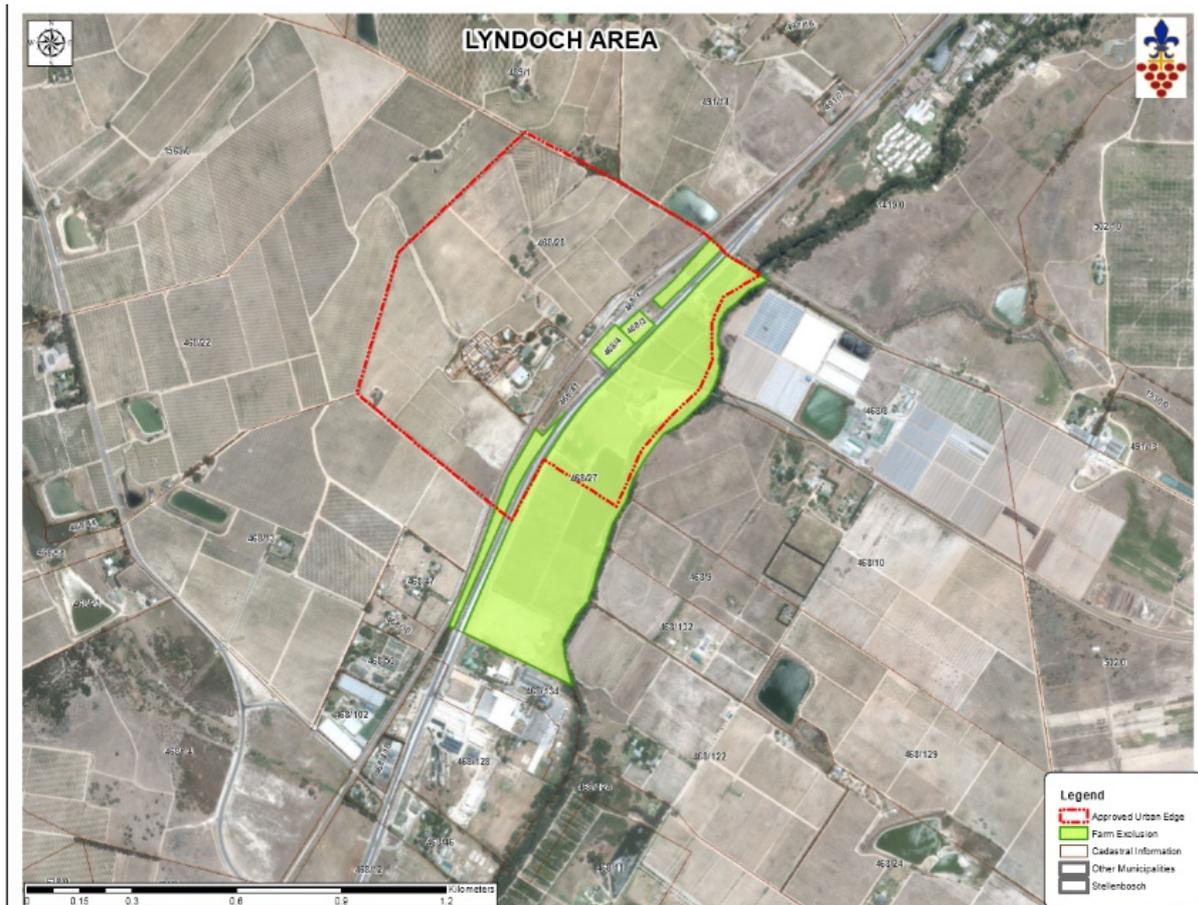


Figure 5.1: Areas proposed for exclusion from Act 70 of 1970 by the Department of Agriculture (areas coded pea-green)

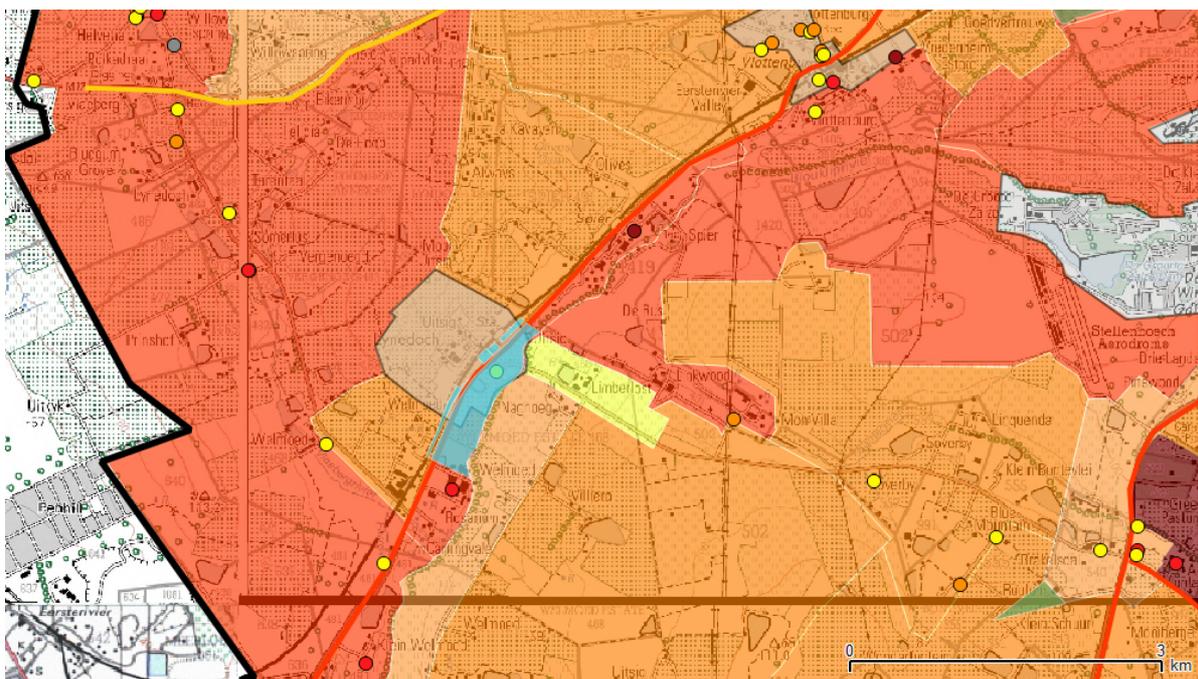


Figure 5.2: Relevant Extract from the CWPPA Phase 2b Draft Inventory of Heritage Resources (areas coded light blue)

“General: Lynedoch's layout and form has become extremely convoluted since the 'upgrading' of the R310 in the vicinity of the Annandale intersection. Historically, the western side of the settlement took direct access off the R101 across the rail line at a level crossing. This has now been closed for safety reasons.

Only direct pedestrian and cycle access is available over the rail line at Lyndedoch station. The main approach to Lynedoch village west of the rail line by road is now via Vlotenberg, some 3kms to the east, resulting in a 6km long dog leg access route.

The road access management regime imposed by the provincial department of transport along the R101 is likely to only permit direct access onto the property concerned for unsignalized full intersections (SFIs) or high volume driveways (HVDs) every 500 to 600m. The main access is likely to occur off the road. This limited access regime is likely to result in a highly inappropriate walled off- high security character to this section of the R101, completely at odds with its proposed designation as a Class III heritage route.

Furthermore, the urban geometric design and street furniture used in the recent upgrading of the section of the R101 from Lynedoch to the western municipal boundary was considered to be so out of keeping with the rural character of this section of the route that concerned stakeholders took the road upgrading project on judicial review. This resulted in there being no further extensions to the upgrading project east of Annandale road.

It should be further considered that all of the retail, public transport and education facilities at Lynedoch are on the west side of the R101. This means that any future residents on the east side of the R101 will have to cross over this rural arterial road to get to these facilities.

Sadly, and inescapably it has been the experience that pedestrian deaths from motor vehicle conclusions result when there are different land uses straddling arterial routes. Although pedestrians are meant to use pedestrian crossings it is usually too expensive to put in a sufficient number to create sufficient convenience for pedestrians not to take short cuts. Furthermore, the recent upgrading of the R101 has resulted in an increase in vehicle average speeds which, may that be a welcome result in terms of vehicle travelling times further increases the risk of pedestrian accidents. It is a sine qua non that speed kills. This it can be confidently, but again sadly, stated that this has been the experience of all urban areas straddling high speed rural arterials. It would be interesting to investigate the status of vehicle accidents in this vicinity since the upgrading of this section of the R101 was completed.

Taking the above into account it is now considered that urban development east of the R101 will be inappropriate, mainly for safety reasons.

Secondary, but still important, reasons include the loss of rural character that would occur at Lynedoch village, partly due to the likely access regime and partly due to the likelihood that a gated estate would be constructed due to both safety and access conditions.

This means that the Lynedoch Urban Edge should be moved westwards to lie along the R101”.¹³

¹³ Ibid.

5.1 Ptn 27/468 - **not to be excluded from Act 70/70** "for the reasons given above".¹⁴

Part of Landscape Unit C11 (7.55) **Grade IIIA**

At the intersection of Annandale Road and the R310 a modest church building with surrounding structures has landmark significance. This unit forms part of a pattern of settlement of early freehold land grants along the Eerste River. Spier is a major commercial venture, with a number of degraded elements such as the parking lot next to the R310. Large scale agricultural development threatens the significant historic pattern of settlement, distinct to the Eerste River corridor.

5.2 Sliver of land between the road and the rail line - **not to be excluded from Act 70/70**. "This piece of land is extremely narrow and is likely to be viable for normal development. occupies a key gateway location on the R101 as it approaches Lynedoch from the west. It offers views of the "drie gewels", an historic land mark at Lynedoch. These views would be obscured if this property were developed".¹⁵

Part of Landscape Unit C08 (6.6) **Grade IIIB**

The Sustainability Institute's Eco Village (with school and wetland) is a good example of integration of mixed income and use. The hamlet is situated around the Drie Gewels Hotel, one of the finest examples of Cape Revival architecture within the winelands. In the 1980's it hosted music concerts associated with the Voelvry movement (a genre of anti-apartheid Afrikaans music). The site has a degree of architectural, landmark, historical, artistic and contextual significance next to the R310. The Eco Village is situated in close proximity to the Lynedoch railway station, which has a very invasive and bulky concrete pedestrian bridge over the road, and a giant strawberry is the landmark for a filling station and store. The edge of the rolling hills adds value to the scenic route as one enters the Cape Winelands from the N2. Its typology is of a very fine grain with a scattered, yet ordered feel. Taking into account the history and associations of this landscape unit, any form of development especially needs to challenge the current tendencies (gated exclusion) and to pioneer integration.

¹⁴ Ibid.

¹⁵ Ibid.

6. Raithby

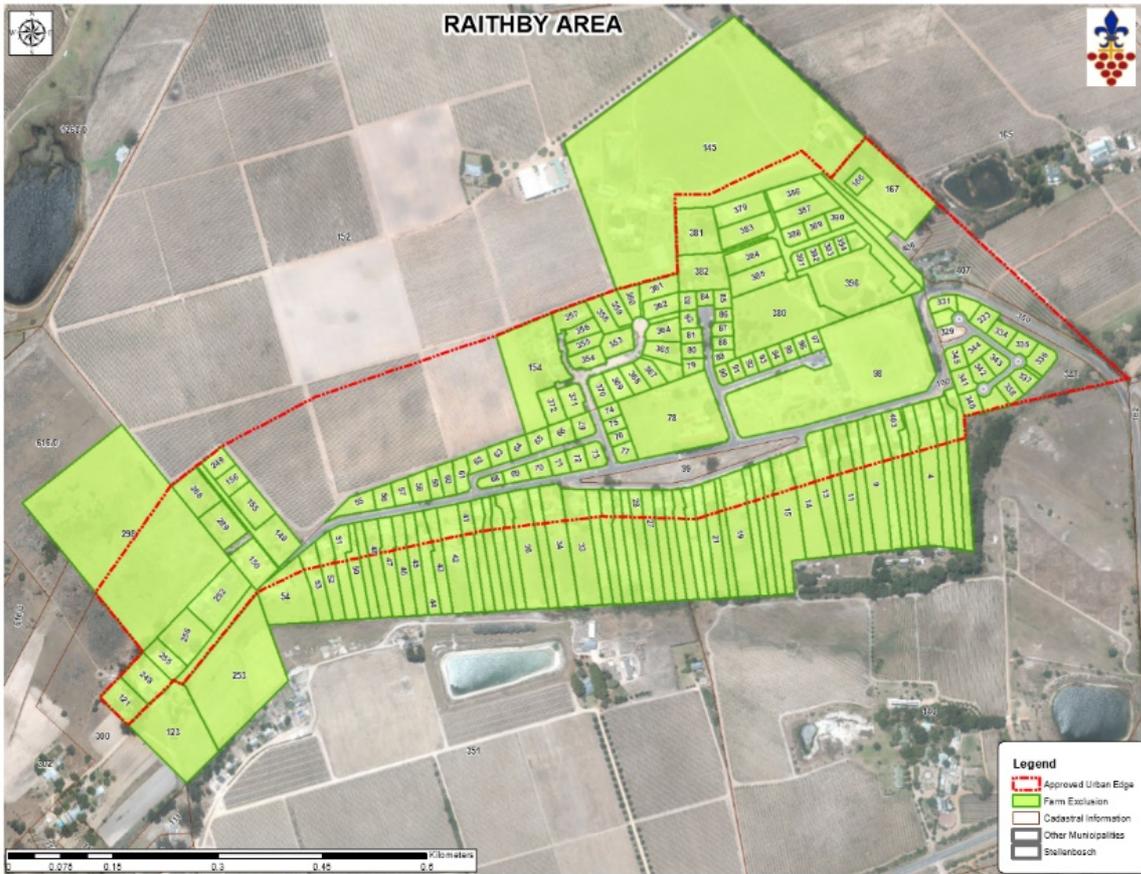


Figure 6.1: Areas proposed for exclusion from Act 70 of 1970 by the Department of Agriculture (areas coded pea-green)

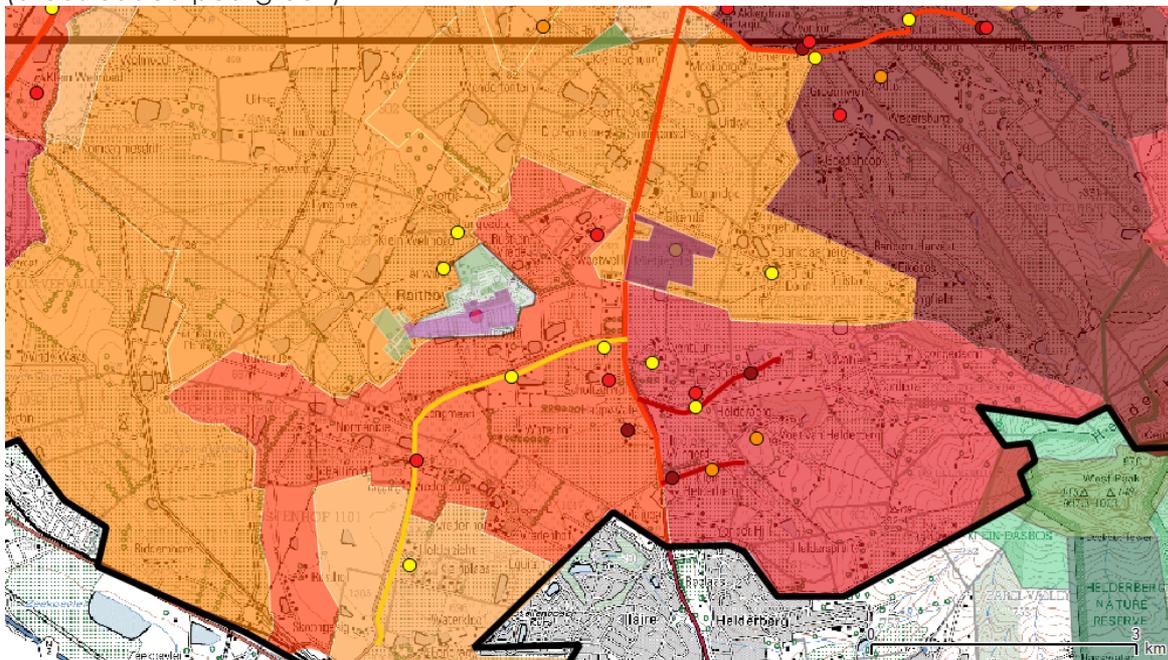


Figure 6.2: Relevant Extract from the CWPPA Phase 2b Draft Inventory of Heritage Resources

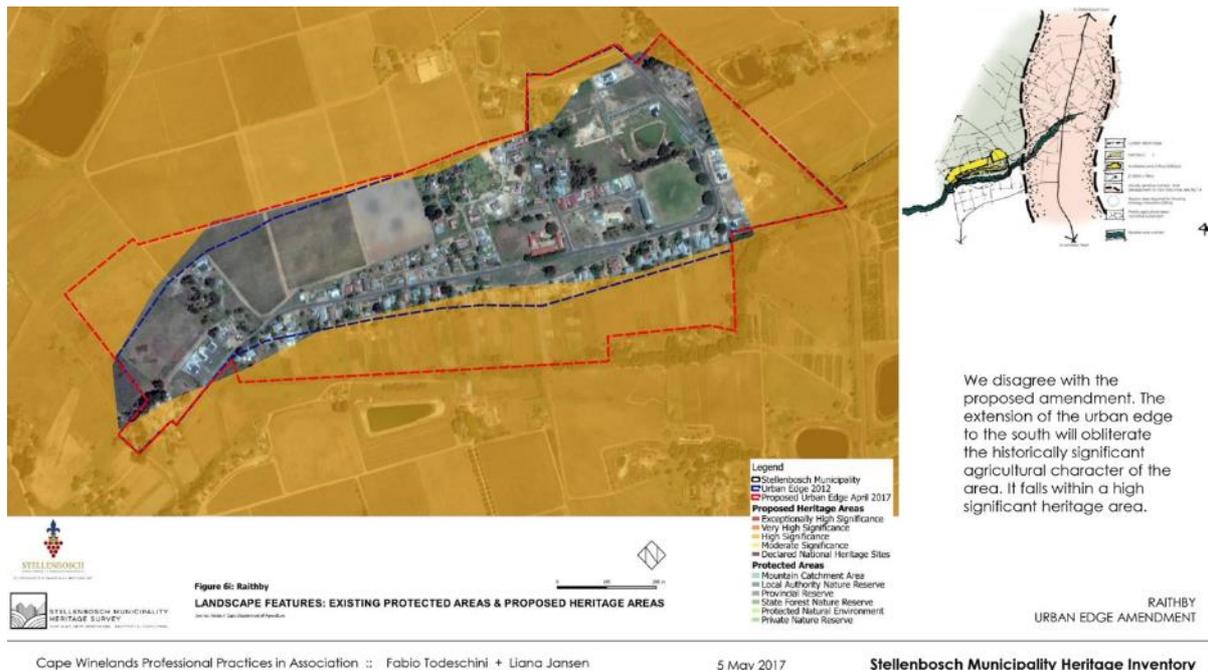


Figure 6.3: Relevant Extract from the CWPPA Comment and Presentation, April/May 2017

We are not at all clear about the position of the Urban Edge and how it relates to these proposals, since the information appearing on Figure 6.1 is very different from that appearing in municipal proposals made available to us, and on which we commented, in April 2017. Figure 6.3 shows what we commented on in April 2017 and reported back on in May 2017.

6.1 Farm 298 – **not to be excluded from Act 70/70** – “unless subdivided along approved Urban Edge. Northern portion of property is outside of Urban Edge, is on good agricultural land and is recorded in 2013 Crop Census”.¹⁶

See below for our own comments relating to 6.1 to 6.3.

6.2 Farms 123 and 253 – **not to be excluded from Act 70/70** – “Not supported for exclusion. An application should be made under Act 70/70 which should investigate possibility of subdividing off a thin band of land closest to the road for residential purposes with the balance of the two properties being consolidated for agricultural purposes”.¹⁷

6.3 Farm 145 – **not to be excluded from Act 70/70** – “This property is located on good agricultural land which is under vineyards according to the 2013 crop census”.¹⁸

Farms 298, 123, 145 and 253 Part of landscape unit C19 (6.25) **Grade IIIB**

This rather hidden landscape is rich in texture with expansive 360 degree views over the Helderberg, Bottelary Hills and False Bay. The combination of wilderness and cultivated landscape that varies in use from vineyards to field crops and open fallow land are the building blocks of this rural landscape. The central rolling foothills directs

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Ibid.

the structure of this land unit with streams flowing from the mostly convex bulging of the land. Ecological support areas are found around these drainage lines, and north of Raithby areas of critical biodiversity are found in the intact Renosterveld pockets. The only access to this land unit is via a gravel road from Annandale. The highest point of the central rolling hills has good quality soil, while the rest of the rolling landscape is of medium quality with the concave folds around drainage lines of low quality. A small area of early freehold land grants is seen in the south western corner close to Raithby. A large area of commonage on the northern border next to Annandale Road, features small plots of different agricultural use, some with dilapidated greenhouse structures. An outspan ('Lot no 1') is situated directly next to the commonage, and at that intersection, a cairn of rocks is a landmark feature in the fork of the road. The 'Compagnies drift' outspan starts as a small unit next to the Eerste River and stretches up the slope. These outspan areas were placed in close proximity to an old wagon route that used to traverse this central area. This land unit has significance for its historic layering of commonage and outspan areas and the secluded character from the rest of the Stellenbosch Municipal area. Therefore it has a high degree of historic, scenic, aesthetic and associated cultural significance. The commonage has the potential to address some of the social needs of access to land for crop production, recreational areas and access to medicinal plants.

6.4 Farms 1 to 54 Raithby, (watererven) – not to be excluded from Act 70/70

– “not supported for exclusion from Act 70/70 for the following reasons:

- *Environmental – protecting the river corridor – note; no urban development nor ploughing should be permitted within 32m of the river banks or from a riparian set back line to be determined by a fresh water ecologist;*
- *Agricultural – these long thin agricultural plots comprise ‘water erven’ or horticultural plots designed to be irrigated from a furrow along the road along the high side of the plots through which water is led by gravity along furrows irrigating food gardens and draining into the river on the low side of the plots. This is a sustainable low energy irrigation system aligned with climate change, food security and other environmentally sustainable guidelines and principles;*
- *Heritage – these garden plots formed the historic basis for Raithby’s existence in terms of the sustainable livelihoods and food resource they provided. However, as can be seen above, they are important not only as a heritage artefact but have contemporary importance as well in terms of agricultural and environmental functions”.¹⁹*

From the Townscape Study, the town of Raithby has been proposed as a Heritage Area according to the following guidelines:

Raithby is the settlement within the Municipality that most strongly retains its characteristic “Mission Town” structure and pattern. Raithby Road runs parallel to the river course, with long, narrow “water erf” plots still occupying the space between them. Houses are set hard up against Raithby Road (and Hendricks Street, which encircles the commonage) and their back gardens are open, cultivated areas leading down to the stream. A steep rise beyond the stream course creates a green, cultivated and agricultural backdrop against which the garden allotments are viewed. The two key institutional buildings are located above Raithby Road: the Methodist Church and the school. These are set against the gentle rise of the hill

¹⁹ Ibid.

beyond. Between these buildings and the houses is the commonage, which is an open area where the community can literally, and spatially, “come together”. It is rare to find a 19th century Cape Mission Settlement with such a clear, intact and discernible spatial structure, and therefore this spatial ensemble is deserving of the highest level of heritage protection. Already, gated housing developments are encroaching on the town to the north-east – it is critical that they do not erode the clear structure, pattern and context of the settlement.

Special Streets, Places and Buildings within the Townscape Character Unit The special are rare character of Raithby as a townscape unit is created by the juxtaposition of the riverine corridor, the “water erf” plots, the cottages lining Raithby Road and Hendricks Street, the commonage and the school and church precinct. Importantly, it is also the visually clear rise of the hills above the school and church, and the cultivated slopes on the other side of the river, which provide visual containment and an agricultural context to the settlement as a whole.

7. Stellenbosch (Valleys A, B & C of Heritage Inventory)

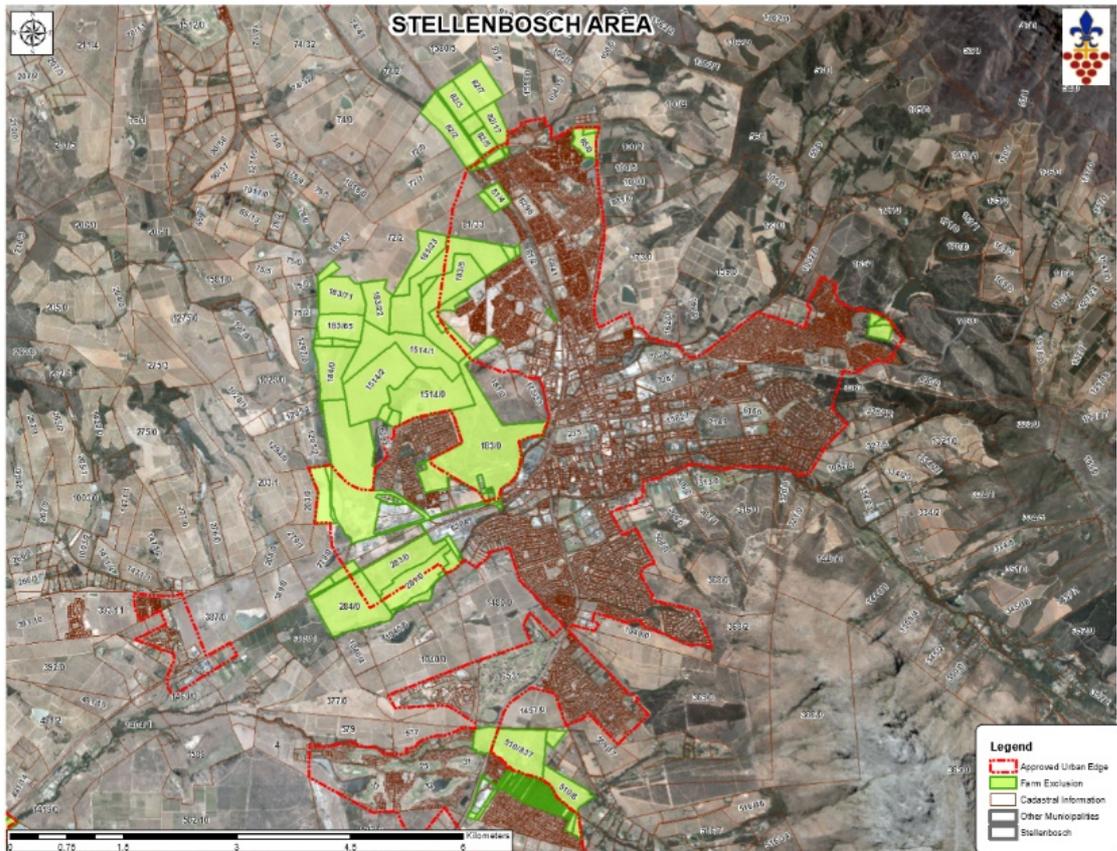


Figure 7.1: Areas proposed for exclusion from Act 70 of 1970 by the Department of Agriculture (areas coded pea-green)

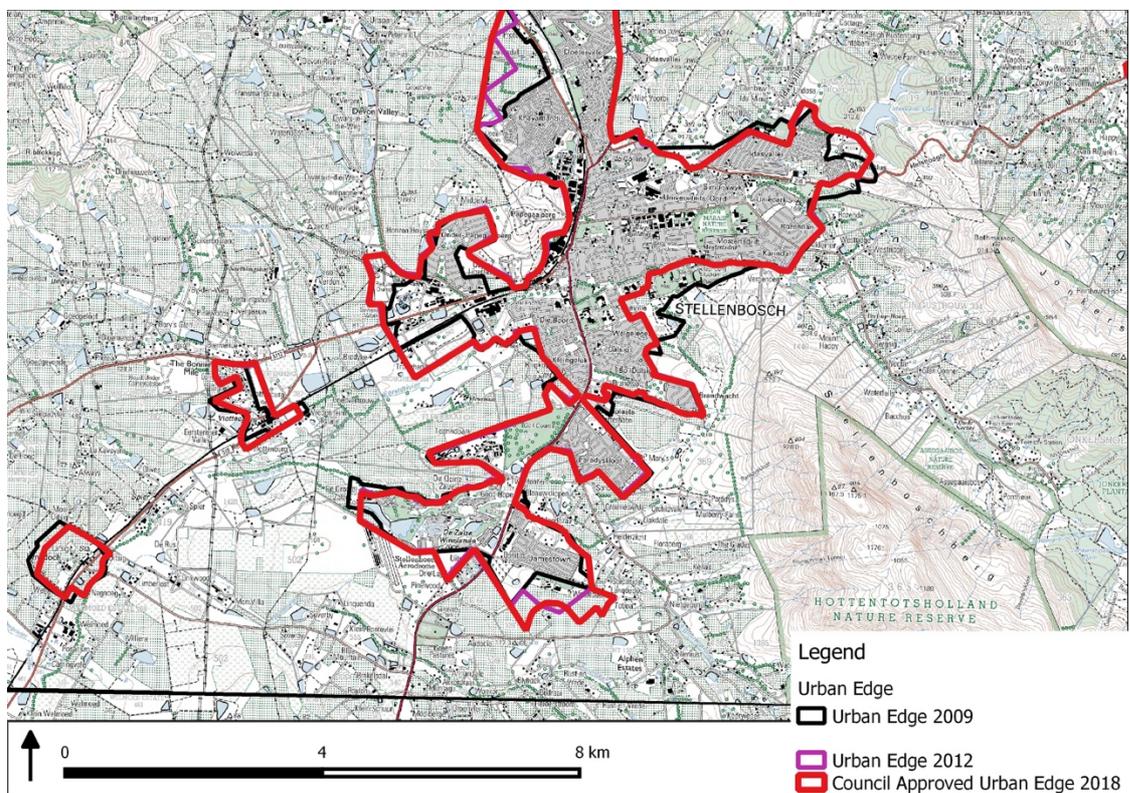


Figure 7.2: Urban Edges as supplied by the Stellenbosch Municipality

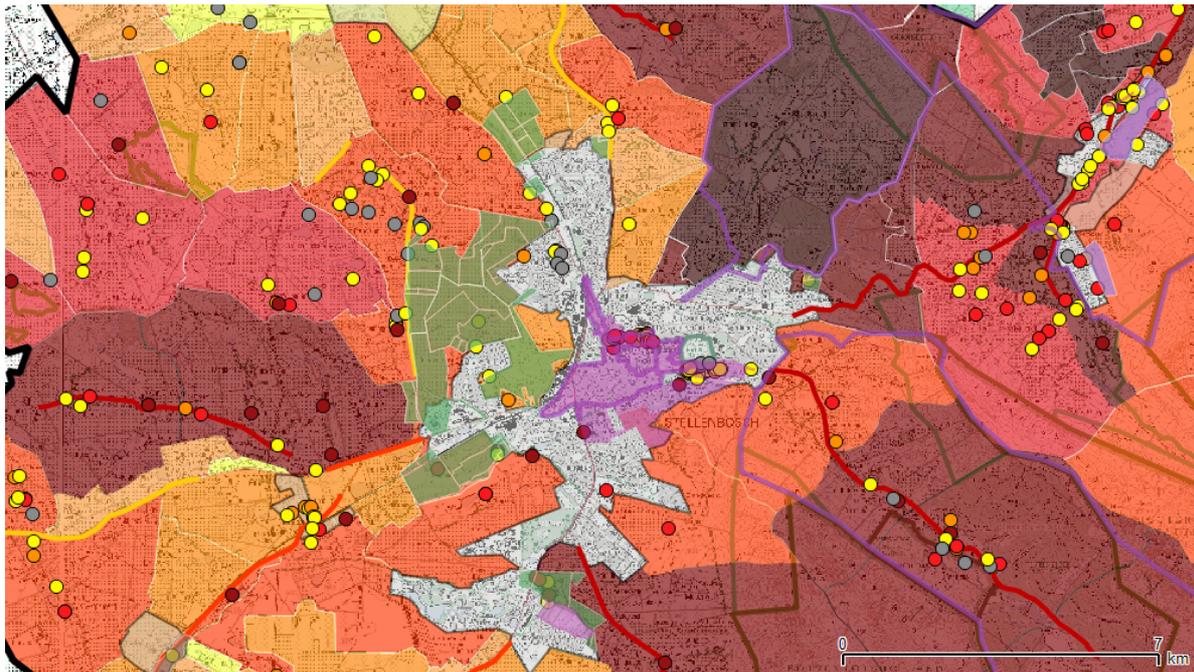


Figure 7.3: Relevant Extract from the CWPPA Phase 2b Draft Inventory of Heritage Resources

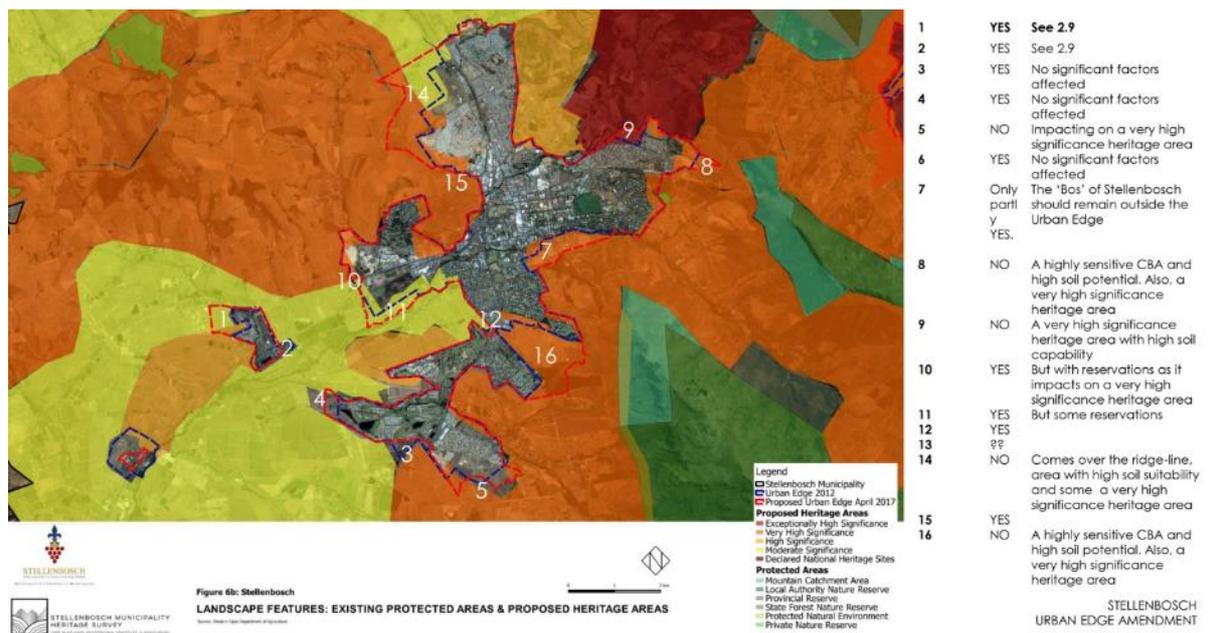


Figure 7.4: Extract Slide from our Presentation to Inter-Government Committee, 5 May 2017

We note with alarm the huge extent of farmland proposed to be excluded from the provisions of Act 70 of 1970 located mainly to the west (and some to the north) of the Urban Edge of the Stellenbosch urban area (as shown on Figure 7.1), for many reasons including that much of this farmland is situated on some of the best agricultural soils to be found in the study area (indeed, in the country).

We are not clear about the legal position of the Urban Edge and how it relates to these proposals, since the information appearing on Figure 7.1 seems to be different from that depicted in municipal proposals made available to us (shown in

Figure 7.3), and on which we commented extensively in April 2017 (summarised in the right-hand column of Figure 7.3).

7.1 Farm 82 Ptns 82/2,3,5,7,17 and adjoining properties outside of the Urban Edge highlighted green – **not supported for exclusion from Act 70/70** – “located on Ecological Support area abutting river, on proposed Scenic Route Class IIIA and in an important Gateway location approaching Stellenbosch town (Cloetesville and Kayamandi)”.²⁰

*“Located on good agricultural land, under vineyards in terms of 2013 Crop Census, on visually prominent slopes and in strategic gateway location at entrance to Stellenbosch town”.*²¹

Part of Landscape Unit A05 (6.85) **Grade IIIB**

The Plankenburg and Klippies Rivers merge on the historic Nooitgedacht Wine Farm with large areas of ecological support creating a lush river corridor in the southern portion of the landscape unit along the R304. The unit is characterised by neat rectangular vineyards, orchards and fallow fields on the rolling hills. A number of smallholdings are located in the southern portion of the unit and development is generally well hidden amongst the trees.

This landscape has significance for its pattern of settlement within the Stellenbosch Winelands, with a distinct nestled character along the river floodplain. A small area of vineyards, located to the north of Nooitgedacht with its western boundary on the railway line, has unusually high quality viticulture soil given its location on a valley bottom, and therefore enjoys a degree of rarity. The new Weltevreden development is a form of urban sprawl.

7.2 *“NOTE: Urban edge alignment along western boundary of ptn 33 Farm 81 southwards to inflexion point does not correspond with either approved 2016 Urban Edge nor proposed 2017 Urban Edge”.*²²

7.3 Farm 183 Ptns 23, 22, 71, 65, Farm 184, Ptns 1,2 and Rem Farm 1514 and intervening properties coloured green – **not supported for exclusion from Act 70/70** – “are not recommended for exclusion and are on high potential agricultural land currently under vineyards according to 2013 Crop Census.

*These properties comprise part of the Devon Valley Farming area, reputed to contain some of the best agricultural land in the Western Cape, if not South Africa. It is not clear how they could have been identified for exclusion from Act 70/70. Therefore, it is recommended that a formal investigation be undertaken as to how these properties came to be identified for exclusion from the provisions of Act 70/70”.*²³

7.4 Farm 183/0 - **not to be excluded from Act 70/70**

Part of Landscape Unit B01 (6.7) **Grade IIIB**

This distinct Renosterveld hilltop marks the western edge of Stellenbosch, and anchors the town of Stellenbosch to the dramatic peaks of the Hottentot-Hollands Mountains on the eastern border. Most of the hill is classified as a critical biodiversity

²⁰ Ibid.

²¹ Ibid.

²² Ibid.

²³ Ibid.

area in degraded state, and a small pocket in natural condition. Ecological support areas are found around the Plankenburg River on the south-eastern edge. The overall degraded state of this hilltop is due to its prior function as a forestry plantation and more recent fire damage. The dominant pattern on the hilltop was determined by the remaining contour tracks that now act as service roads leading to the infrastructure on top. They also facilitate social interaction through a Parkrun every Saturday morning. From the top of Papegaaiberg and along the contour lines, expansive views are found over the Stellenbosch winelands that terminate in the dramatic Hottentot Hollands Mountain range. Papegaaiberg is a distinct hilltop that differs in character from nearby mountains and the Bottelary Hills.

Papegaaiberg is a landscape in recovery and has historic, archaeological, place, landmark and a high level of social significance. Papegaaiberg should continue to function as a landmark to the town of Stellenbosch, and be kept free of development. It has the potential to function as an integrated social space with expansive views.

7.5 Farm 183 and 184 - not to be excluded from Act 70/70

Part of Landscape Unit B03 (7.5) Grade IIIB

This landscape unit is an enclosed valley within the rolling Bottelary Hills. The Veldwagters River, its ecological support area, and the Devon Valley Road are aligned along the lowest point of the landscape. Regular blocks of vineyards, and sporadic new developments are evident in this valley. The cultural landscape has been transformed dramatically in Devon Valley over the last years. Degrading elements have been added to the landscape, yet it remains one of the most romantic valleys in the study area. Devon Valley is a dynamic and changing landscape with an active and working community. Key features in this landscape unit are smaller 'lifestyle' farms (as small as 2.4 ha) and interrupted rows of trees on the edge of boundaries. These interrupted tree lines on boundaries are one of the elements within this landscape that differs from its neighbouring pockets in the winelands. On the higher slopes, expansive views are found towards the dramatic mountains of Stellenbosch. The view from Blumberg Road over the valley must be one of the most beautiful views in the Stellenbosch winelands. Early freehold land grants were located on the middle slopes of the western side of the valley. Petershof is one of the finest examples of a Cape Revival house within the winelands and is well hidden among mature trees next to the Devon Valley Road. A number of workers cottages are seen from the road. These structures, although modest, reveal the working community within the area where large working farms offer job opportunities. A number of nurseries and schools as well as a church are situated within this valley. This landscape has significance for its capacity to absorb new development (except for some intrusive structures and fragmented properties) in a way that retains a scenic, balanced, textured landscape, and therefore has aesthetic significance with a high level of resilience. Farm complexes are often associated with workers cottages and these are often aligned in rows or clusters and reveal the significance of a working community within the valley. In other areas of the winelands these cottages are being transformed and therefore lose significance.

7.6 Farm 151 - not to be excluded from Act 70/70

Part of Landscape Unit B02 (7.4) Grade IIIB

This landscape unit is an enclosed pocket within the rolling hills. It is slightly tilted towards the suburb of Onder-Papegaaiberg, giving a visual extension towards the open vineyards that lends the suburb a rural character. A single drainage line starts at an indent in the landscape where the farm complex is located, and follows the lowest line with its associated ecological support area. Rectilinear vineyards follows the alignment of the contours. This entire land unit has high soil suitability for the production of wine (viticulture). Middelvlei has significance as an example of a Victorian-era farm werf within the Stellenbosch area. Being located close to the Bottelary, it has commonality with other Victorian structures, such as those found at Wolwedans and Fort Simon. This landscape has historic, rural and scenic significance in its proximity to the suburb of Onder-Papegaaiberg.

7.7 Farm 284 – **not supported for exclusion from Act 70/70** – “for the following reasons:

- *Environment - contains ecological buffer vegetation;*
- *Outside of the proposed heritage area designation;*
- *Important rural gateway to Stellenbosch town's western approach.*

Note: it is recommended that the Urban Edge in this vicinity be moved eastwards and northwards to coincide with the proposed Heritage Proclamation area”.²⁴

7.8 Farm 284- **not to be excluded from Act 70/70**

Part of Landscape Unit C13 (6.65) **Grade IIIB**

This land unit is largely flat and part of the Eerste River Floodplain. Large Eucalyptus windbreaks are a distinct feature, as well as a centrally placed werf. The Eerste River forms the eastern vegetated boundary and ecological support areas follow this line. The windbreaks create a sense of enclosure with a textured and uniform geometric pattern. Granite outcrops are seen along the eastern boundary. Upper Vredenburg has buildings that are of some age and create a fine, if modest historic farm settlement amongst the surrounding agricultural landscape and interesting Palm avenue. This distinct land unit with its strong windbreak edges is part of the distinctive settlement pattern found between the Eerste River and the R310 and has a high degree of historical, architectural, scenic aesthetic and contextual significance.

7.9 Farm 281 and abutting property coloured green – **not supported for exclusion from Act 70/70** – “for the following environmental reasons – forms part of riparian corridor along Eerste river and this section is also prone to flooding”.²⁵

7.10 Farm 283/0 & 281/0 - **not to be excluded from Act 70/70**

Part of Landscape Unit C14 (7.25) **Grade IIIB**

The southern boundary of the Eerste River anchors the site with extensive ecological support areas. A non-perennial drainage line connects with the Eerste River on the western boundary, while a remnant windbreak is a strong geometric feature on the upward slope towards Technopark. A large part of the landscape unit presents undefined pasture land and a workers' housing complex. A large concentration of the early freehold land grants occupy this area, adding to the significance of this

²⁴ Ibid.

²⁵ Ibid.

land unit, while agricultural use declined in the 2000's. This land unit reads with the Klein Vredenburg werf on the Urban Edge. The farm has specific significance of a layered werf, with associated family ownership during periods of early land grants, commercialisation following the Phylloxera outbreak, and more recent institutional/research functions. The farm has all the typical physical elements of a Cape Dutch werf, but also exhibits a fine Cape Revival building (probably designed by Kendall) that replaced the main homestead. The site holds a very high degree of historical, architectural, aesthetic, contextual, scenic, and associational significance. It is a rare and fine example currently under threat from development.

7.11 Ptns 6 and 837 (check) of Farm 510 and abutting properties coloured green – **not supported for exclusion from Act 70/70** – “for the following reasons:

- *Environmental – these properties abut the northern bank of the Blauwklippen river and protect the river corridor – note no urban development nor ploughing should be permitted within 32m or from a riparian set back line to be determined by a fresh water ecologist. It is especially important not to repeat the inappropriate precedent found along the southern bank of the river in this vicinity which included filling some of the flood plain along this section of the river;*
- *Agricultural – these properties contain good agricultural land and ptn 6 contains vineyards as per 2013 crop census;*
- *Heritage – these properties are an integral part of the historic Blauwklippen farm which has stretched down to the river in the vicinity of its werf since it was first enclosed. The historic farm complex is found on Farm 837/510 (check);*
- *Gateway character – Farm 837/510 (check) straddles both sides of the Blauwklippen river and the R44 as it enters Stellenbosch immediately after passing De Zalze and Jamestown. It is thus part of the high quality scenographic introduction to Stellenbosch for northbound travellers entering the town”.²⁶*

7.12 Farm 510- **not to be excluded from Act 70/70**

Part of Landscape Unit C29 (8.5) **Grade II**

This landscape is integrally connected to Jamestown and its unique heritage. Under no circumstances can the agricultural fields (water erven) leading down to the river be allowed for subdivision. A sub-valley within the Eerste River Valley that demonstrates the complex relationship between river course, old wagon route, rural landscape and wilderness characterised by the Helderberg and Stellenbosch peaks beyond. Additional structuring elements such as avenues of trees, gateposts and well-defined farm werfs add to the whole.

Jamestown would once have strongly resembled an the archetypal Cape Mission Settlement: a primary street running parallel to a river course; a church occupying a prominent position; cottages lining the road; long, narrow farming allotments running between each cottage and the river course; and an agricultural and wilderness backdrop to the whole.

c1938 aerial photography attests to the strong pattern that would once have existed, with the narrow allotments also extending from the cottages up the hillside, to the south. In essence, Webersvallei Road would have formed the central spine to

²⁶ Ibid.

the settlement, with the church located at the top of the hill. Unfortunately in Jamestown, gentrification has meant that only the long farming allotments are still clearly legible in the townscape. The area south of Webersvallei Road has been entirely developed, with a mid 20th century suburban pattern of street compromising any village character that remains. The interface with the R44 has also been developed in an insensitive manner, with "strip mall" and car outlets creating a buffer between the main road and the historic village. More worryingly, development has begun to encroach to the north of Webersvallei road, threatening the narrow farming allotments that run down towards the Blaauwklippen River – these being the last townscape element/settlement pattern that visually and symbolically connects Jamestown to the other 19th and early 20th century Mission Settlements at the Cape.

Special Streets, Places and Buildings within the Townscape Character Unit The farming allotments are seen to be the most significant element within Jamestown, spatially and symbolically connecting it to the grouping of Mission Settlements, which are of significance in the history of the Cape and the Province.

Additionally, Webersvallei Road and the first row of plots facing northwards onto it is included in the townscape character area: it is here that the key community and institutional sites are located (the churches and the general store), but it is also where the historic scale of the cottages, and their relationship to the agricultural allotments, can still be discerned. These elements are collectively seen to embody the core remaining townscape character of Jamestown, and should duly be protected, and development controlled to ensure this historic pattern is retained and strengthened.

8. Wemmershoek

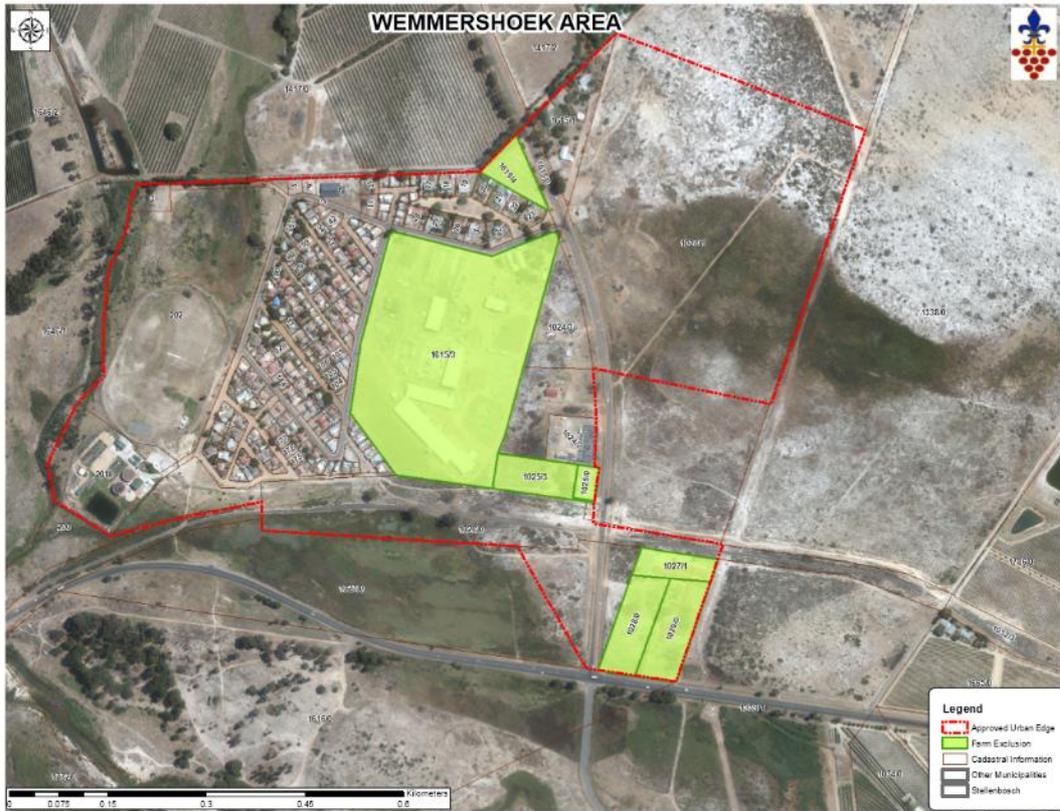


Figure 8.1: Areas proposed for exclusion from Act 70 of 1970 by the Department of Agriculture (areas coded pea-green)



Figure 8.2: Extract Slide from our Presentation to Inter-Government Committee, 5 May 2017

“We have no comment on the properties proposed to be excluded from Act 70/70. However, we wish to point out that the Urban Edge alignment includes Ptn 1 of Farm 1024. Much of this property comprises a large wetland as can be seen from

*the aerial photograph and the inclusion of this property in the Urban Edge should be reviewed."*²⁷

3. RECOMMENDATIONS

Overall and unfortunately, we do not support the majority of the proposals because of much evidence that points to the contrary and for other good and solid reasons that span considerations across heritage resource management and development planning: all for the public good and the longer term.

Indeed, we have to record our disquiet at the National Department of Agriculture proposing that provisions of Act 70 of 1970 be made to not apply to large areas of very significant and fertile agricultural land in the Stellenbosch Municipality.

As is the case with CNDV, we are of the view that an appropriate enquiry be undertaken so as to uncover how and why these proposals have been tabled: on the face of it they appear to be essentially developer-driven.



Prof. Fabio Todeschini & Liana Jansen
For: Cape Winelands Professional Practices in Association

²⁷ Ibid.