

Comment on the Proposed Amendments to the Stellenbosch SDF

by

The Cape Winelands Professional Practices in Association

28 April 2017

1. *Introduction*

The Cape Winelands Professional Practices in Association (CWPPA) have a contract with the Stellenbosch Municipality regarding the provision of an 'Inventory of Tangible Heritage Resources and a Management Plan'. The project started well over a year ago and we have already issued two reports thereon to the municipality, the public and Heritage Western Cape, the provincial heritage authority in terms of the National Heritage Resources Act (NHRA).

The CWPPA has been asked by the Stellenbosch Municipality to comment on proposals that have been made available to us via a drop-box.¹ Specifically, we have been asked to comment on the following, by the date indicated:²

- “Proposed amendments to maps and tables that are relevant to the amended SDF that forms part of the IDP Process of 2017. The documents indicated for comments are to be found in the Folder in the Dropbox entitled – ‘Stellenbosch Municipality SDF’.
- Comments should be received on or before 30 April 2017.
- All other documents are only for your information and perusal. No comments required at this stage.”

So, to be clear: we have been asked to provide comment on a total of 26 specific proposals, all relating to proposed amendments to the Urban Edge within the municipality, which we have itemised and identified as follows:

1. 1 to 16: the town of Stellenbosch itself;
2. 17: the town of Franschhoek;
3. 18: the settlement of La Motte;
4. 19: the settlement of Wemmershoek;
5. 20: the settlement of Groot Drakenstein;

¹ <https://www.dropbox.com/sh/xnveqa4nyhyw9u0/AAD237cUTHtuhKZcVxdcDwfja?dl=0>

² E-mail dated 1st March 2017 received from Jeanne Basson.

6. 21: the Dwars River Valley settlements;
7. 22: the settlement of Klapmuts;
8. 23: the settlement of Koelenhof;
9. 24: the settlement of Vlottenberg;
10. 25: the settlement of Lynedoch;
11. 26: the settlement of Raithby.

Moreover, because proposals relative to the Stellenbosch Western By-Pass were raised and discussed (to a limited extent) at the last Inter-Governmental Committee meeting and have since been aired to a degree in the local press, together with others we have prepared comment on that as well and the comments are here included as item 27.

Since we have some general concerns with some of the proposals, these are here first set out. Some proposals do not appear to have been framed in terms of the clearly stated principles embodied in the Stellenbosch Municipality SDF of November 2012. Indeed and surprisingly, some of the proposals appear to be in direct conflict with stated principles.

Inter alia, the Stellenbosch Municipality SDF (2012) clearly states:

- “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.”³
- “The municipality should be developed as a system of inter-connected, nodal, tightly constrained settlements that have minimal outward expansion”⁴
- “The development of settlement locations should be prioritised firstly on rail routes, then secondly on road routes.”⁵
- “Settlement form should lessen rather than increase the demand for private motor vehicle travel.”⁶
- “The possibility of constructing more stations on the Lynedoch – Klapmuts rail line should be investigated”⁷

3 Stellenbosch Municipality Spatial Development Framework, November 2012, p. 7.

4 Ibid, p. 16.

5 Passim.

6 Ibid, p. 17.

7 Passim.

- “Development approvals should be guided by the need to achieve the settlement densities needed to make the public transport system financially and operationally viable.”⁸
- “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.”⁹
- “Land outside of existing and proposed urban settlements should be used for agricultural production, biodiversity conservation, scenic quality and agri-tourism.”¹⁰

As part of our recently conducted fieldwork, when we personally visited every urban nucleus comprised in the municipality, we noted that the existing typology and grain of development tends to be very bitty, suburban in type, not intensive enough and far too wasteful of the land available within the urban edge. Previous work by CND Africa (Simon Nicks et al) has shown that there is sufficient land available within the respective urban edges of the majority of the urban nuclei that are part of the Stellenbosch Municipality to accommodate the additional needed urban developments, including necessary housing.

The inevitable question arises in the circumstances: why extend and amend the urban edge, when it is not proven as necessary and flouts adopted principles of the SDF?

Having carefully considered the documents made available for which comments are required, we have to indicate that we support 13 of the proposals, have reservations and concerns with 3 of the proposals and do not support (and even object to) 10 of the proposals, as is set out below.

⁸ Passim.

⁹ Ibid, p. 21.

¹⁰ Ibid, p. 29.

2. Our responses to the Itemised Proposals

2.1 1 to 16: the town of Stellenbosch

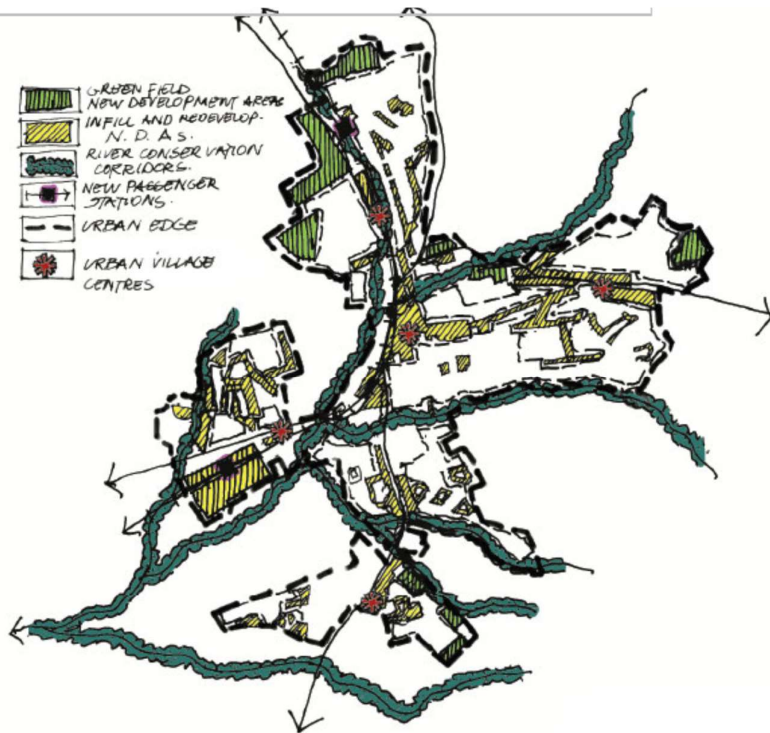


Figure 1: Stellenbosch Proposal (SDF 2012)

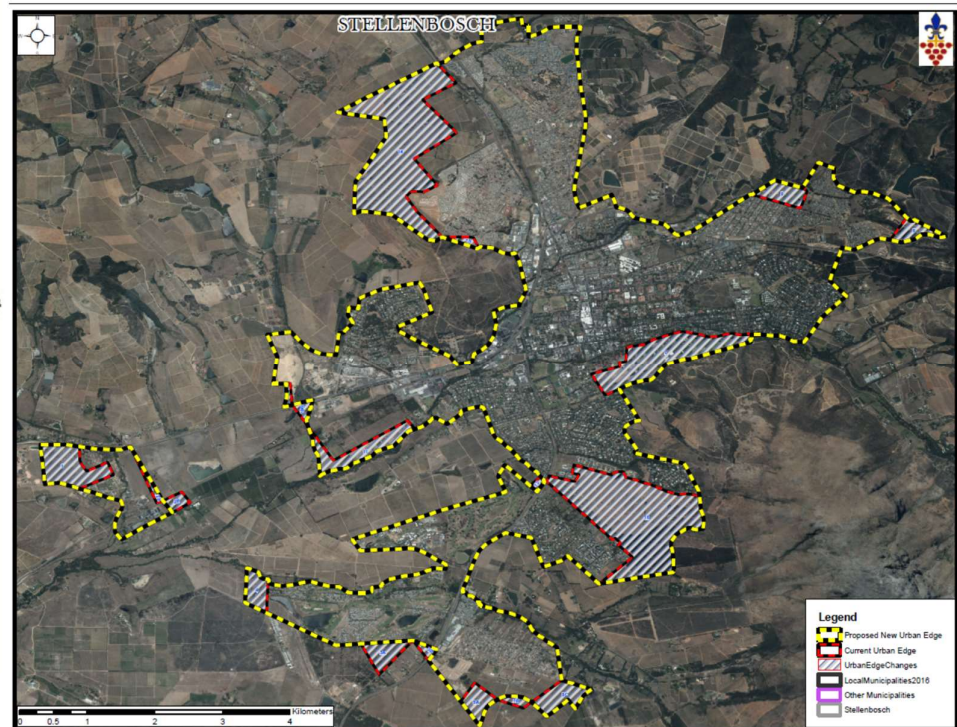


Figure 3: Stellenbosch SDF Amendment 2017



Figure 2: Jamestown Proposal (SDF 2012)

We agree to the amendments but would like to alert the Stellenbosch Municipality to the existence of important biodiversity corridors and wetlands within the

1	Vlottenburg	YES	See 2.9
2	Vlottenburg	YES	See 2.9
3		YES	No significant factors affected
4		YES	No significant factors affected
5		NO	Impacting on a very high significance heritage area
6		YES	No significant factors affected
7		Only partly YES.	The 'Bos' of Stellenbosch should remain outside the Urban Edge
8		NO	A highly sensitive CBA and high soil potential. Also, a very high significance heritage area
9		NO	A very high significance heritage area with high soil capability
10		YES	But with reservations as it impacts on a very high significance heritage area
11		YES	But with some reservations
12		YES	
13		??	
14		NO	Comes over the ridge-line, area with high soil suitability and impacts on very high significance heritage area
15		YES	
16		NO	A highly sensitive CBA and high soil potential. Also, a very high significance heritage area

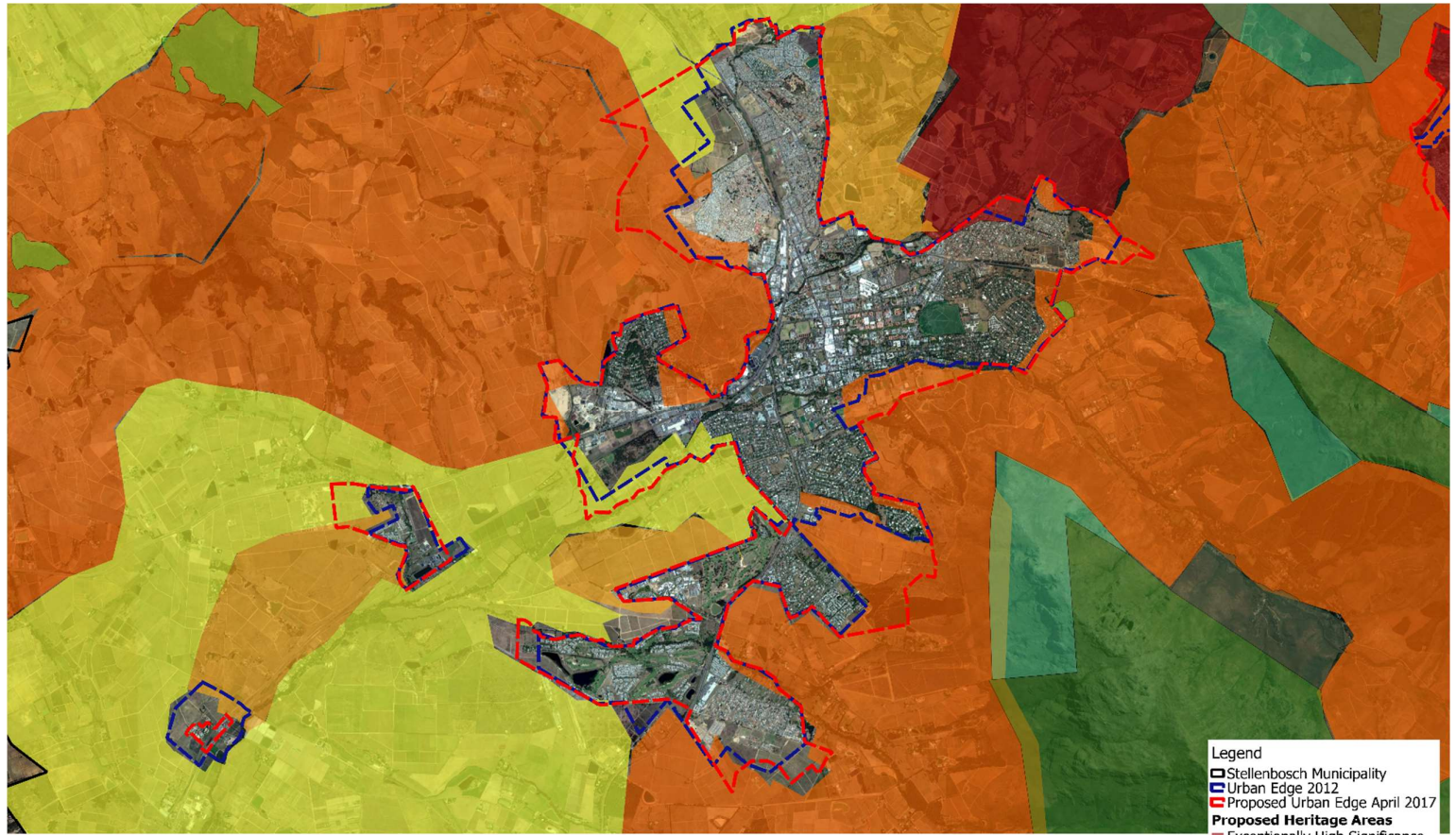


Figure 6b: Stellenbosch
LANDSCAPE FEATURES: EXISTING PROTECTED AREAS & PROPOSED HERITAGE AREAS
 Source: Western Cape Department of Agriculture

2.2 17: the town of Franschhoek

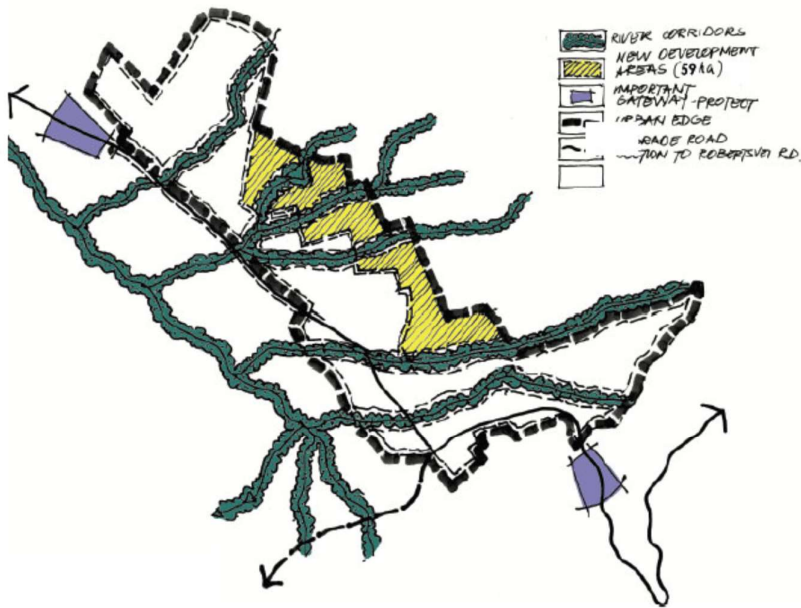


Figure 4: Franschhoek Proposal (SDF 2012)

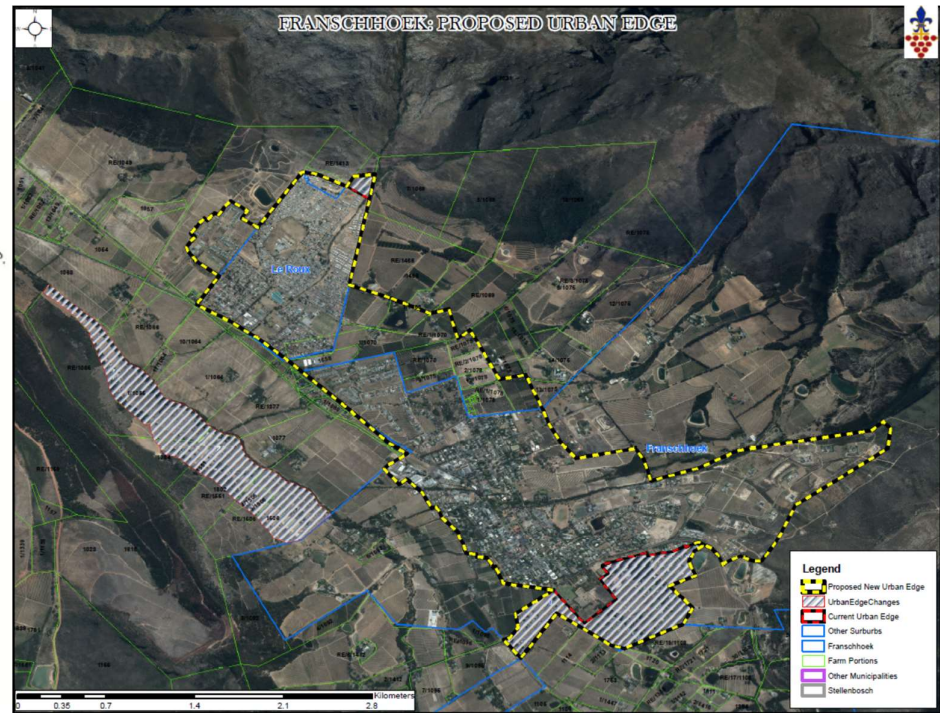


Figure 5: Franschhoek SDF Amendment 2017

We absolutely disagree with this proposed amendment. We question the SDF proposals of 2012 and do not believe they were desirable or logical. Furthermore, the 2017 proposed amendments fall within an exceptionally high significant heritage area and high soil capability.

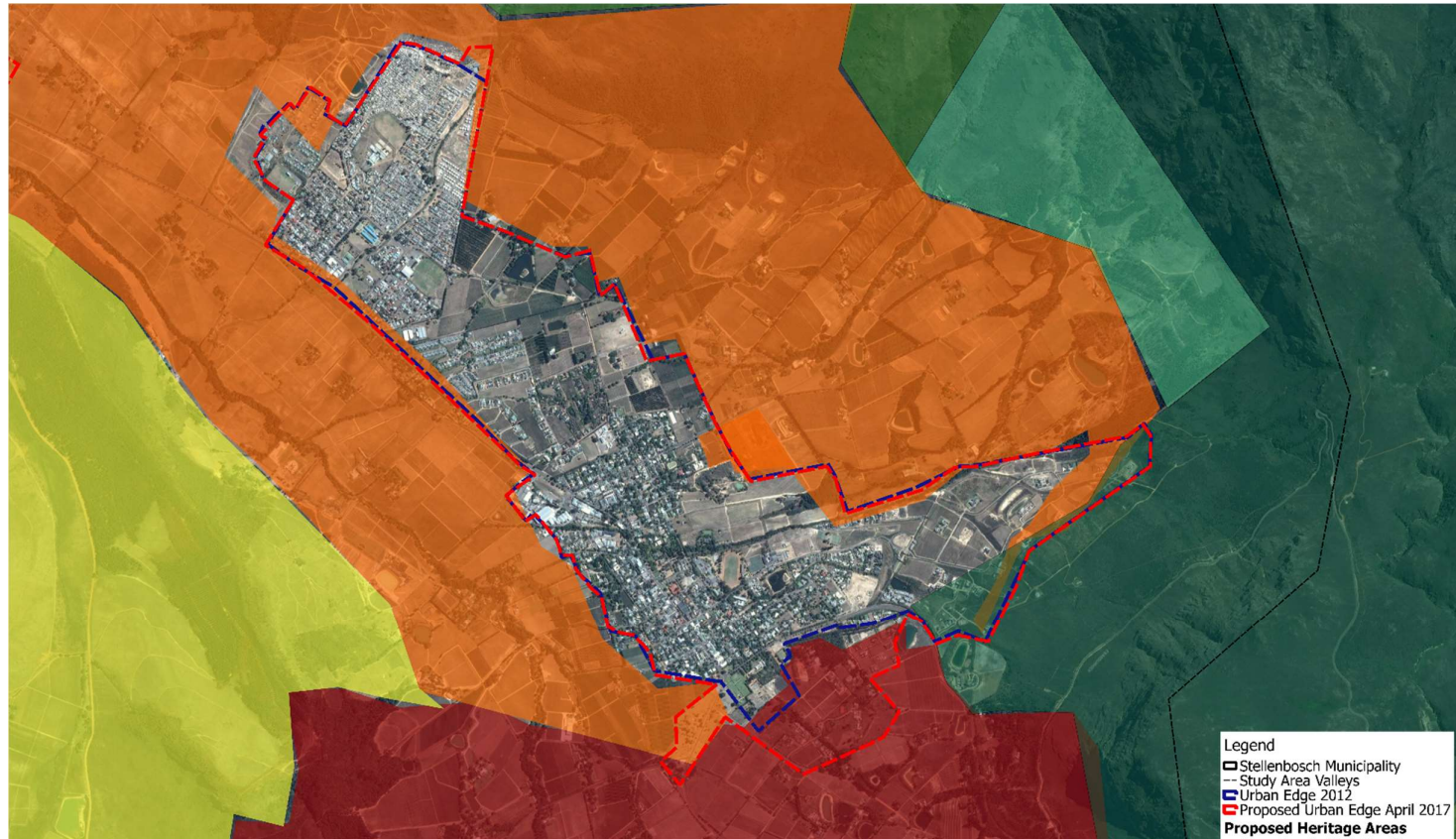


Figure 6a: Franschoek
LANDSCAPE FEATURES: EXISTING PROTECTED AREAS & PROPOSED HERITAGE AREAS
 SOU/100: WERK 11: CABO Department of Agriculture

2.3 18: the settlement of La Motte

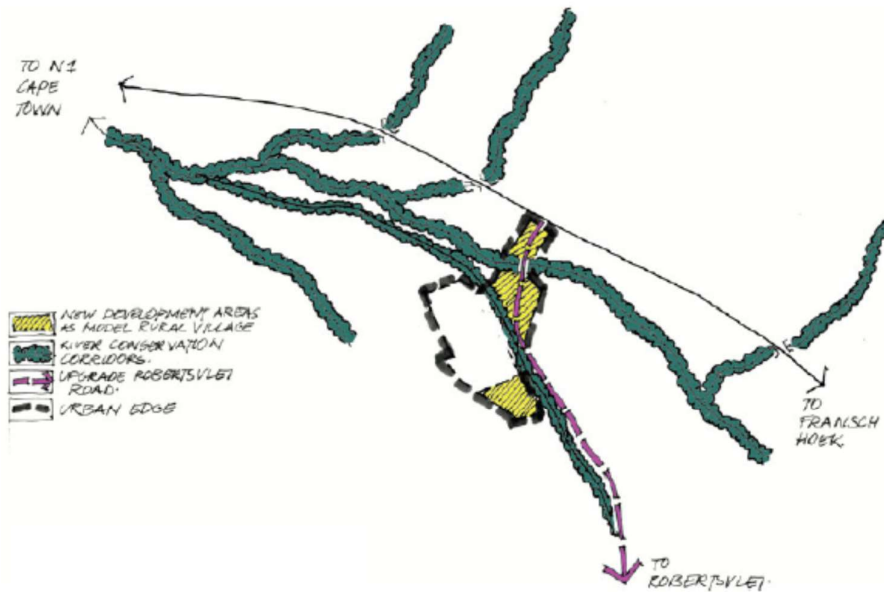


Figure 6: La Motte Proposal (SDF 2012)

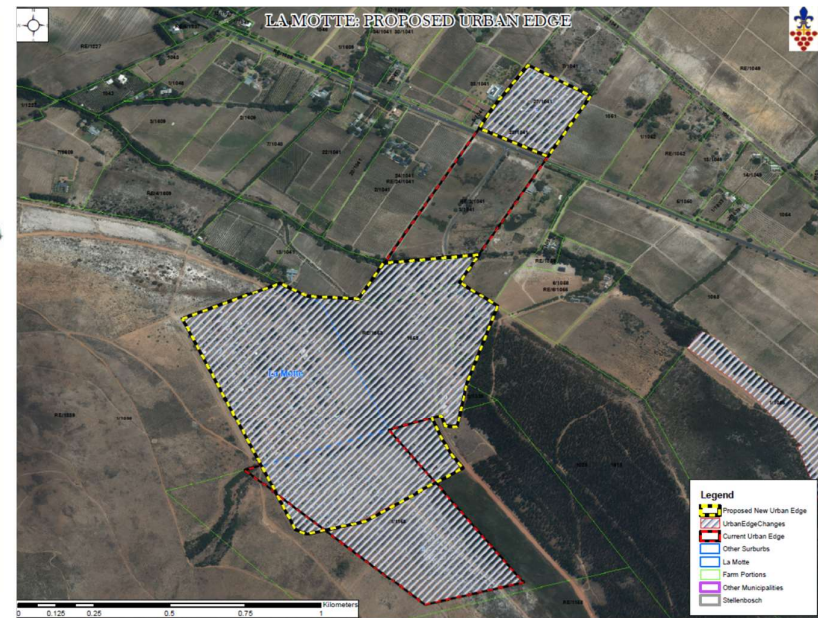
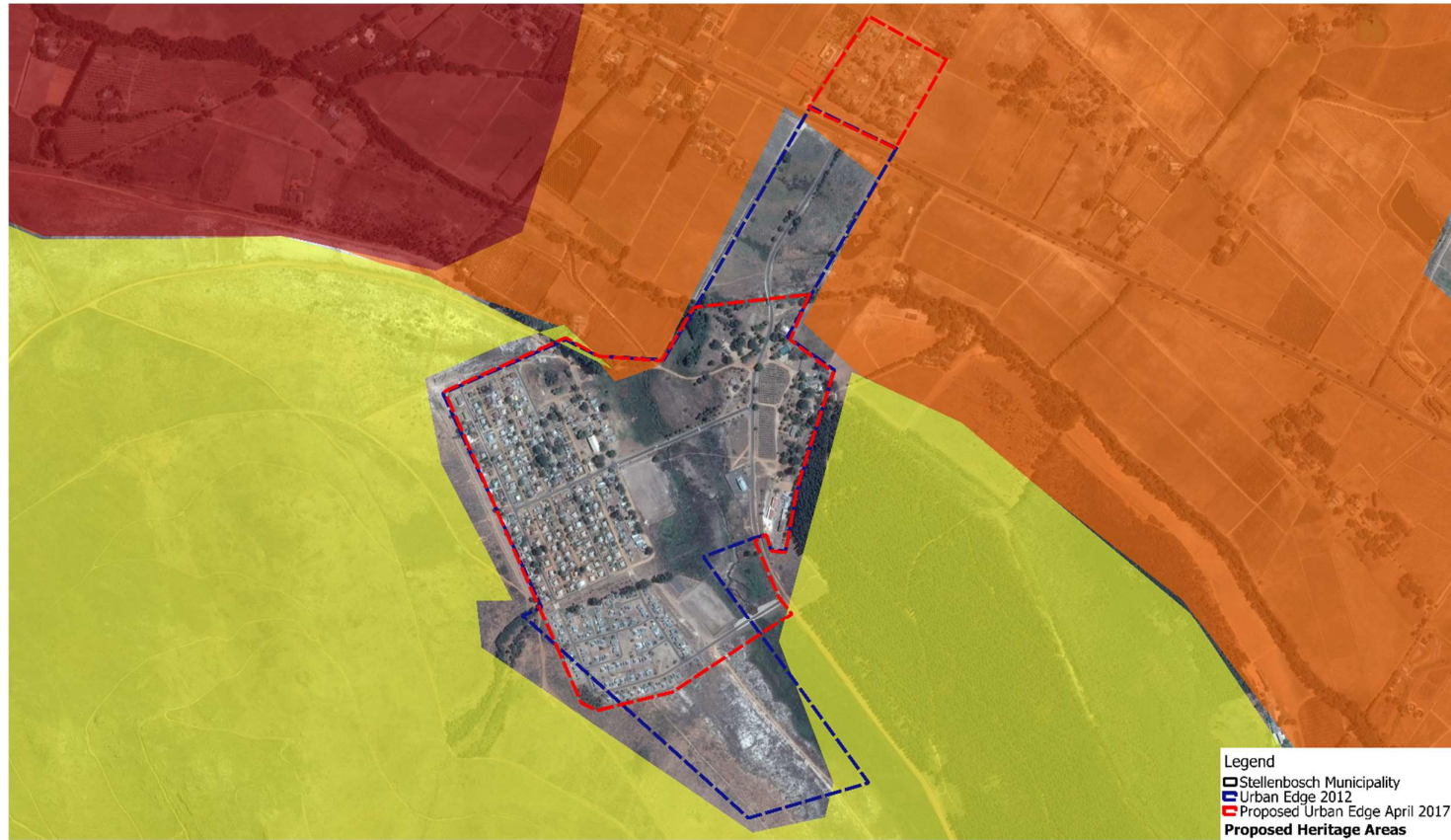


Figure 7: La Motte SDF Amendment 2017

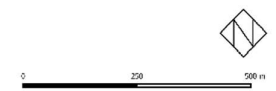
We support the proposed amendment, but have to stress that the section between the R45 and the original La Motte Settlement should remain undeveloped as a highly sensitive CBA, wetland and high soil suitability are located here. We question the SDF proposals of 2012 and do not believe they were desirable or logical.



- Legend**
- Stellenbosch Municipality
 - Urban Edge 2012
 - Proposed Urban Edge April 2017
- Proposed Heritage Areas**
- Exceptionally High Significance
 - Very High Significance
 - High Significance
 - Moderate Significance
 - Declared National Heritage Sites
- Protected Areas**
- Mountain Catchment Area
 - Local Authority Nature Reserve
 - Provincial Reserve
 - State Forest Nature Reserve
 - Protected Natural Environment
 - Private Nature Reserve



Figure 6f: La Motte
LANDSCAPE FEATURES: EXISTING PROTECTED AREAS & PROPOSED HERITAGE AREAS
Source: Verwey: Cape Department of Agriculture



2.4 19: the settlement of Wemmershoek

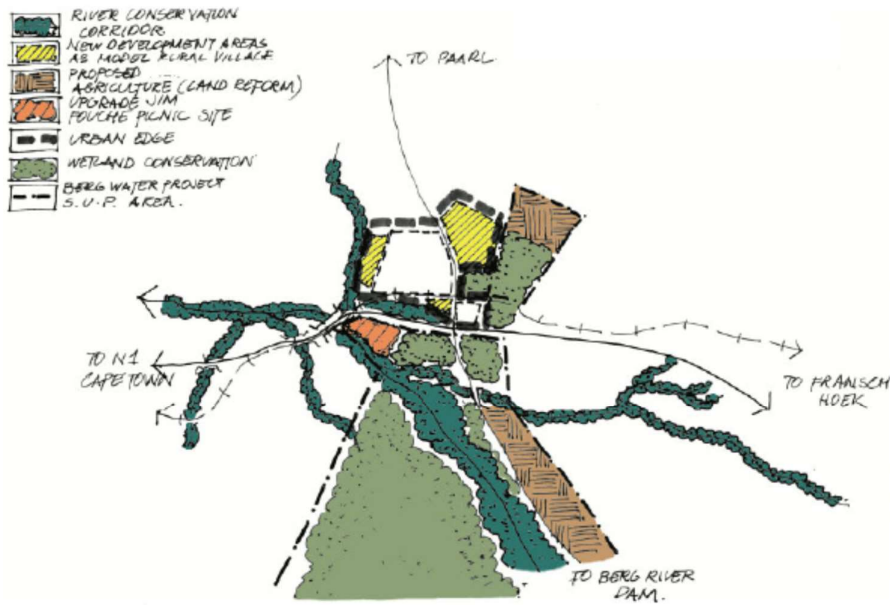


Figure 8: Wemmershoek Proposal (SDF 2012)

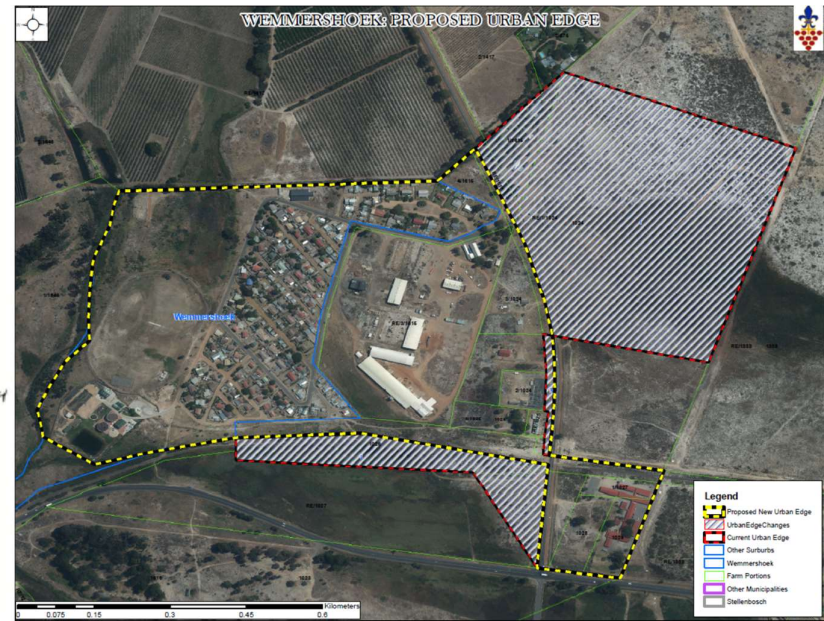


Figure 9: Wemmershoek SDF Amendment 2017

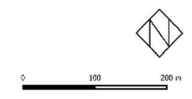
We agree with the proposed amendment. We question the SDF proposals of 2012 and do not believe they were desirable or logical.



- Legend**
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Figure 6j: Wemmershoek
LANDSCAPE FEATURES: EXISTING PROTECTED AREAS & PROPOSED HERITAGE AREAS
Source: Verwey: Cape Department of Agriculture



2.5 20: the settlement of Groot Drakenstein

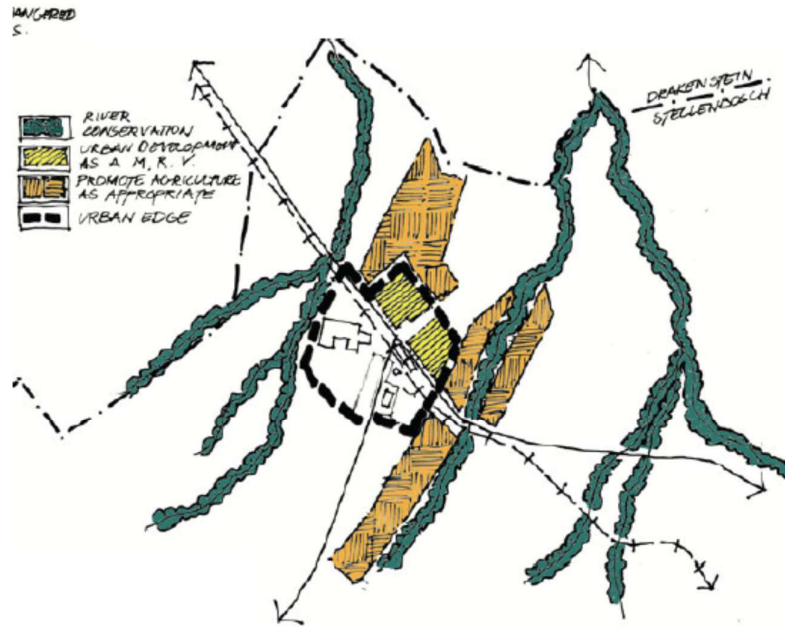


Figure 10: Groot Drakenstein Proposal (SDF 2012)

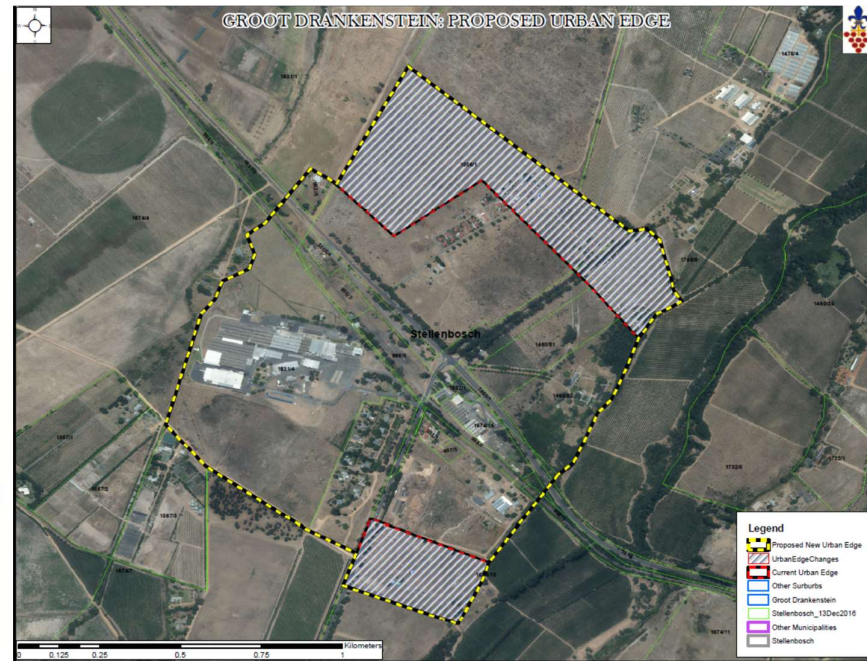


Figure 11: Groot Drakenstein SDF Amendment 2017

We disagree with the proposed amendment. The proposed node is far too large and Lekkerwyn should be outside the Urban Edge. The northern extension impacts on a highly sensitive CBA. Also, the proposed amendment falls within a very high significance heritage area.

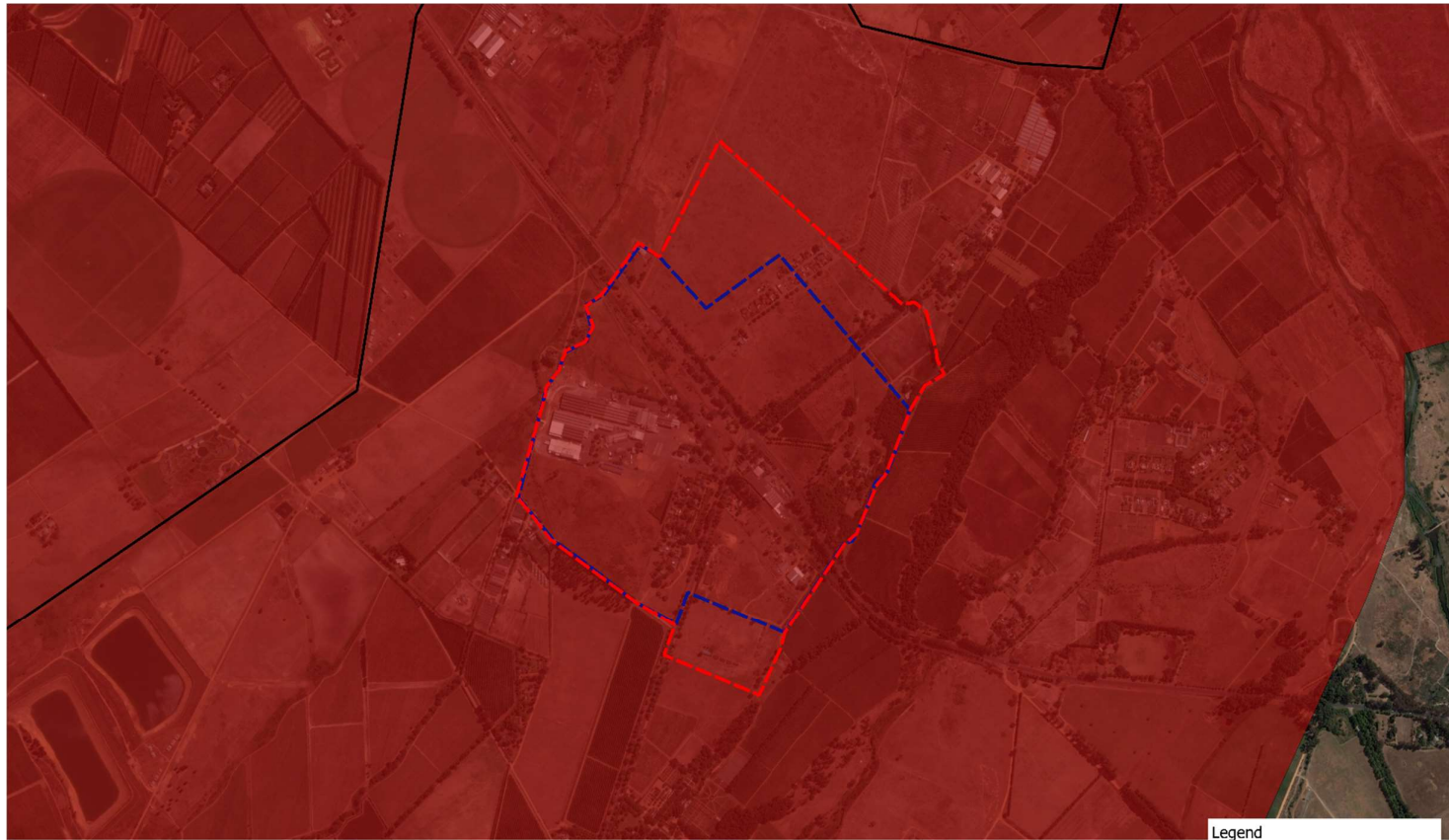
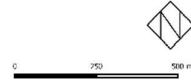


Figure 6c: Drakenstein NHS

LANDSCAPE FEATURES: EXISTING PROTECTED AREAS & PROPOSED HERITAGE AREAS

Source: Verwey & Cape Department of Agriculture



- Legend**
- ▭ Stellenbosch Municipality
 - ▭ Urban Edge 2012
 - ▭ Proposed Urban Edge April 2017
 - ▭ Declared National Heritage Sites
- Protected Areas**
- ▭ Mountain Catchment Area
 - ▭ Local Authority Nature Reserve
 - ▭ Provincial Reserve
 - ▭ State Forest Nature Reserve
 - ▭ Protected Natural Environment
 - ▭ Private Nature Reserve

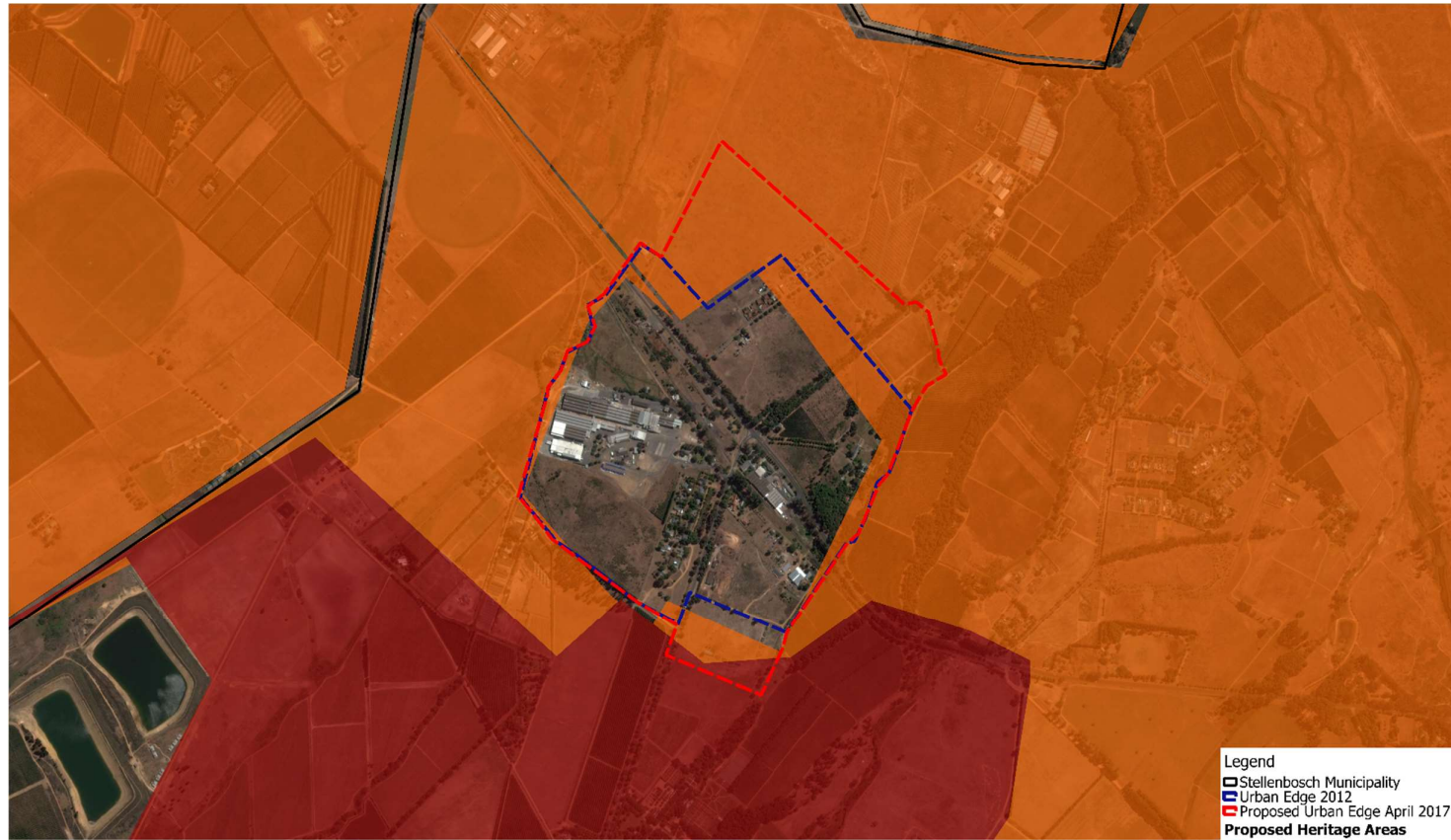


Figure 6c: Drakenstein

LANDSCAPE FEATURES: EXISTING PROTECTED AREAS & PROPOSED HERITAGE AREAS

Source: Verwey: Cape Department of Agriculture

2.6 21: the Dwars River Valley settlements

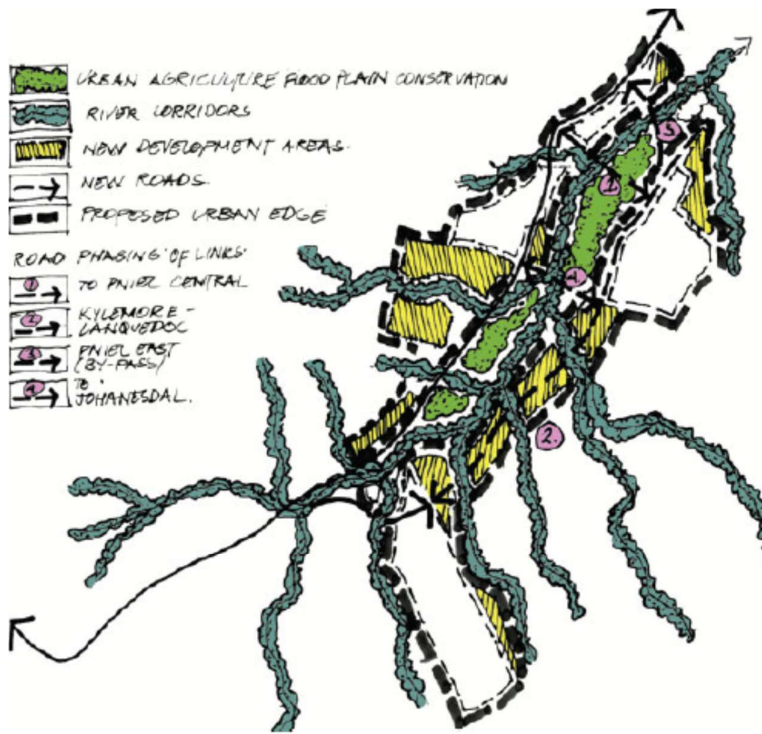


Figure 12: Dwars River Valley settlements Proposal (SDF 2012)

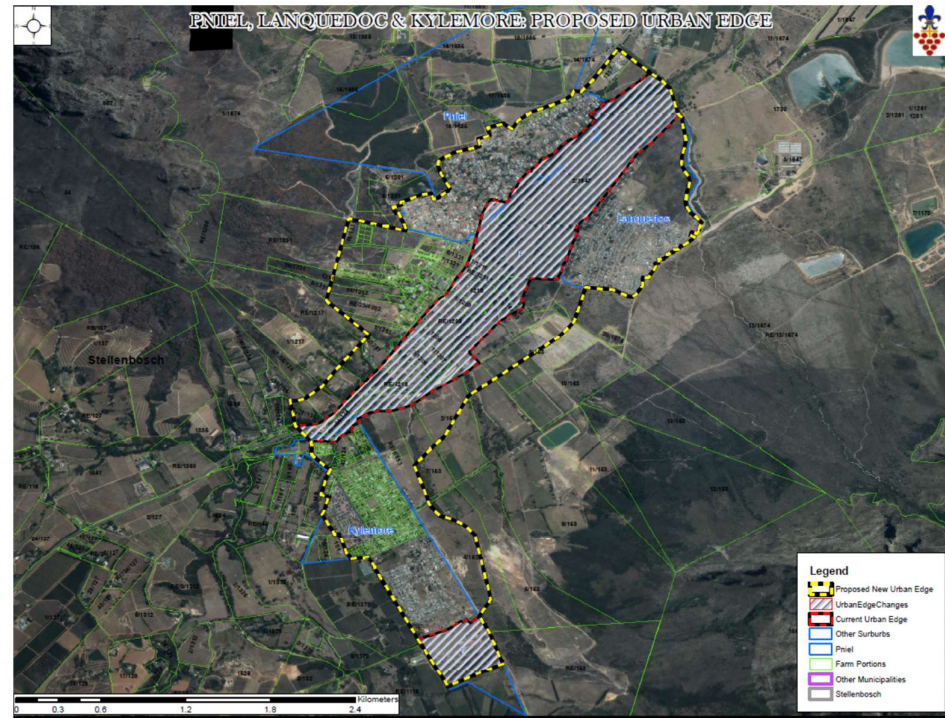
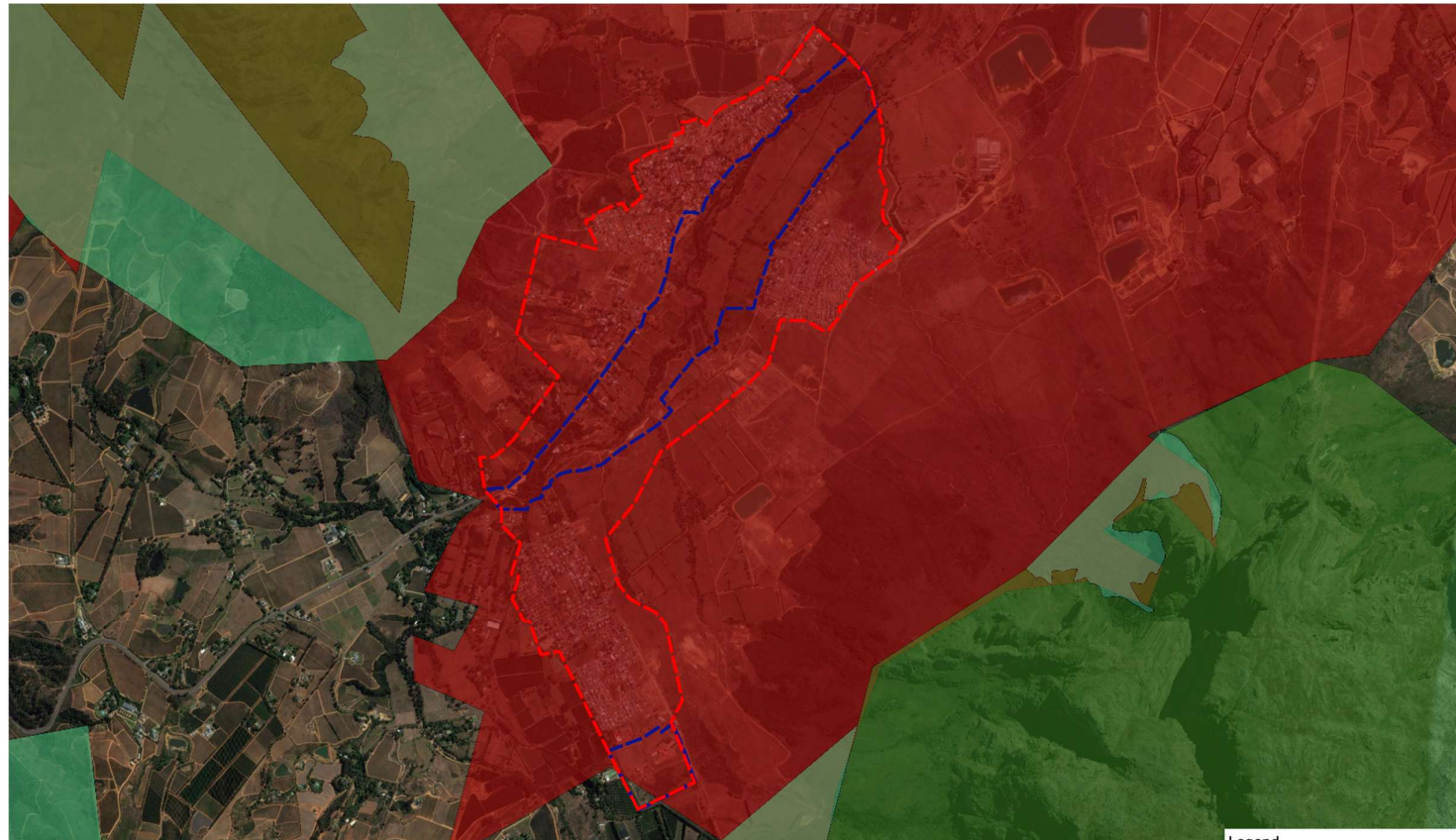


Figure 13: Dwars River Valley settlements SDF Amendment 2017

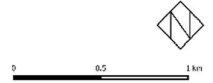
We disagree with the proposed amendment. The valley bottom should NOT be within the urban edge. This area is a CBA and a sensitive wetland area. Furthermore, there is high soil capability in the southern section and it is considered a very high significant heritage area.

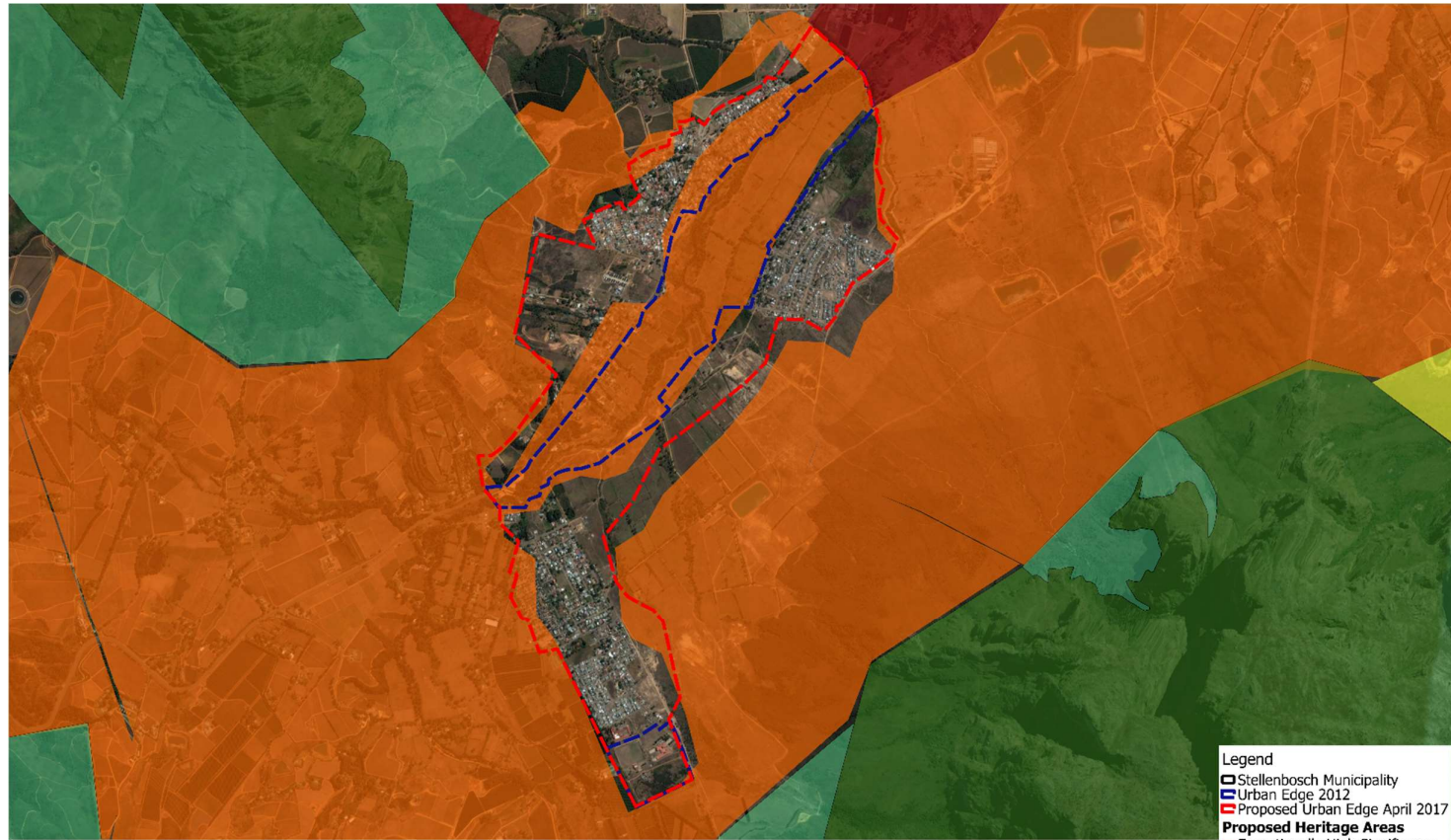


- Legend**
- Stellenbosch Municipality
 - Urban Edge 2012
 - Proposed Urban Edge April 2017
 - Declared National Heritage Sites
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Figure 6h: Pniel, Lanquedoc, Kylemore - Drakenstein NHS
LANDSCAPE FEATURES: EXISTING PROTECTED AREAS & PROPOSED HERITAGE AREAS
Source: View21; Cape Department of Agriculture

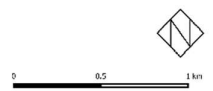




- Legend**
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 - Urban Edge 2012
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Figure 6h: Pniel, Lanquedoc, Kylemore
LANDSCAPE FEATURES: EXISTING PROTECTED AREAS & PROPOSED HERITAGE AREAS
Source: Verwey: Cape Department of Agriculture



2.7 22: the settlement of Klapmuts

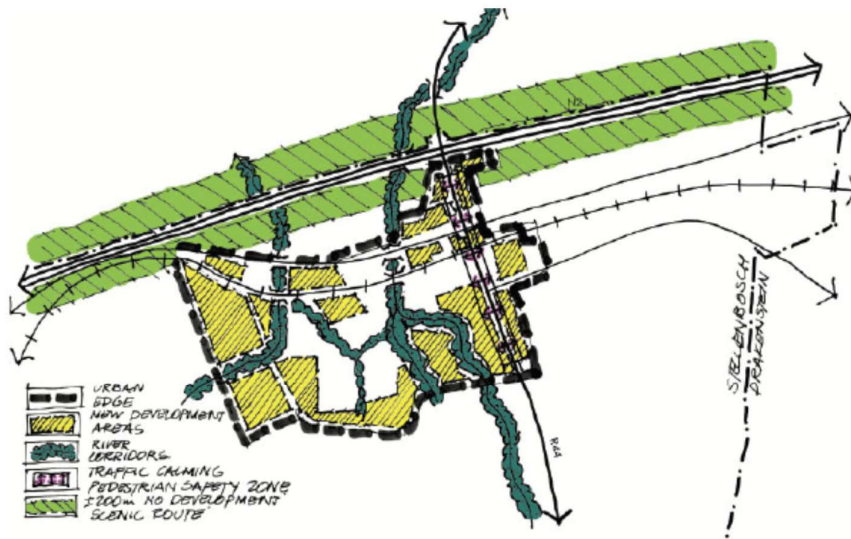


Figure 14: Klapmuts Proposal (SDF 2012)

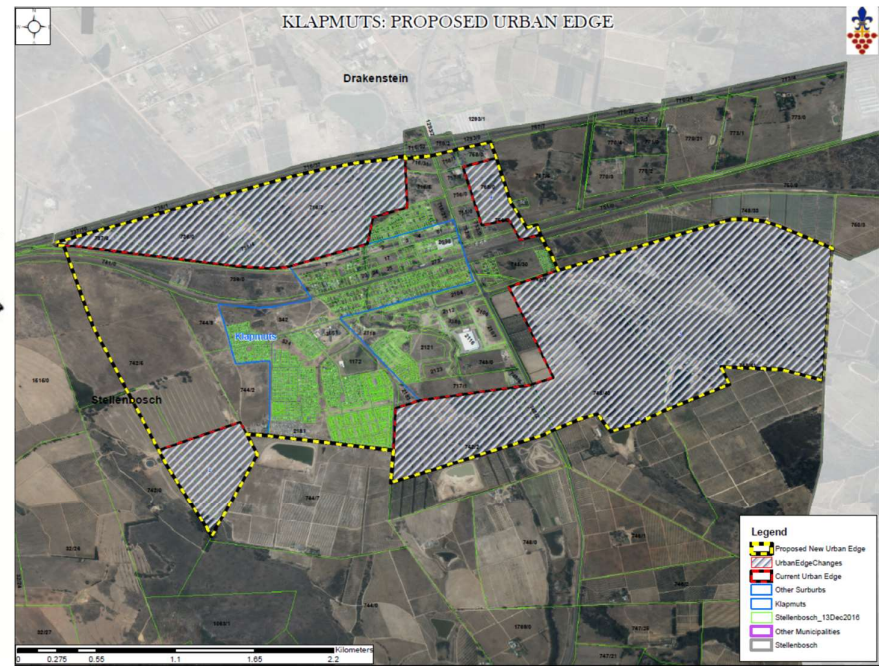


Figure 15: Klapmuts SDF Amendment 2017

We disagree with the proposed amendments as they would bring about a settlement that would be too large. The proposed areas all feature CBA layers and a number of sensitive wetland areas. A far more compact settlement with denser typologies of buildings is desirable.

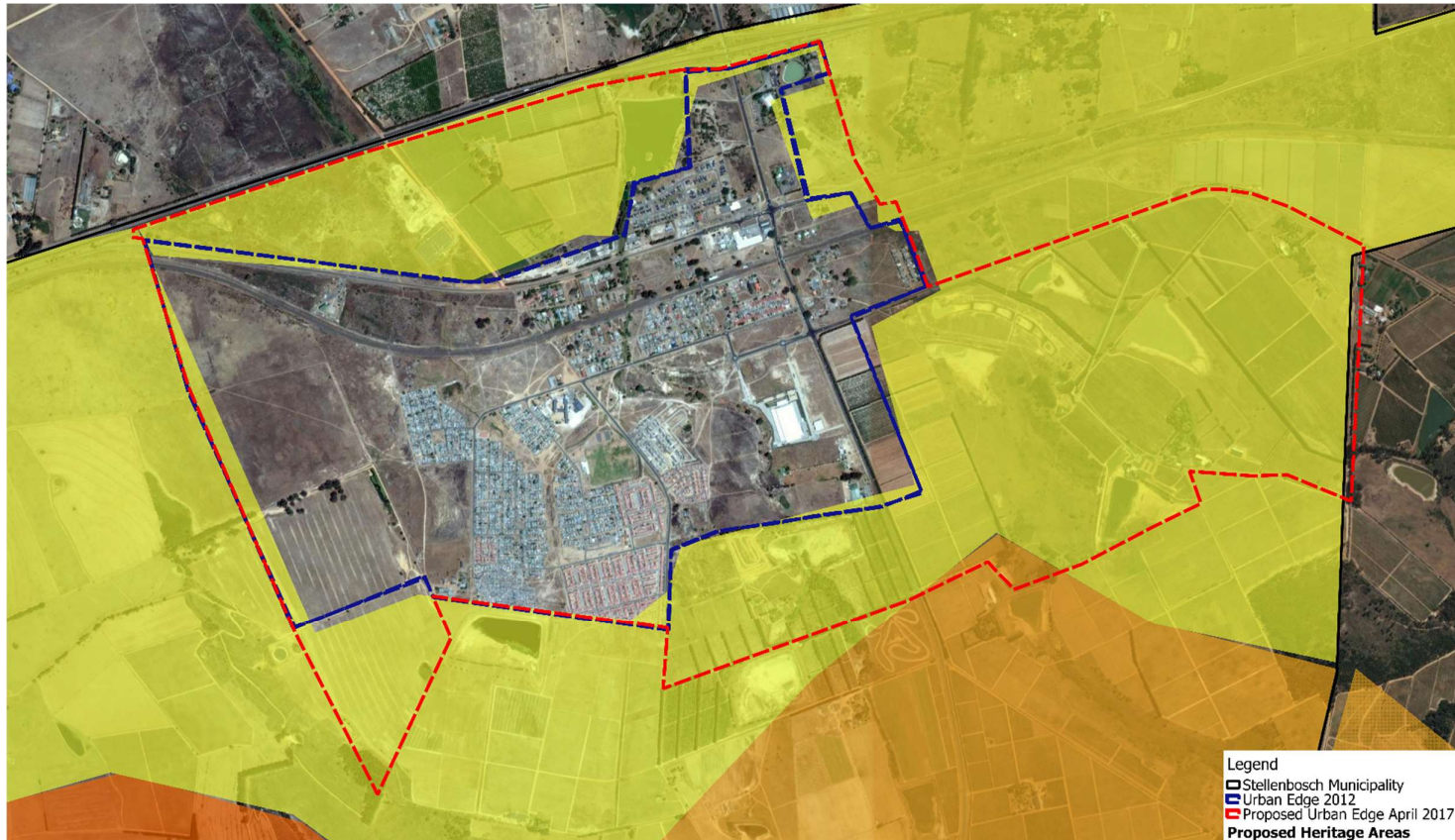


Figure 6d: Klipmuts

LANDSCAPE FEATURES: EXISTING PROTECTED AREAS & PROPOSED HERITAGE AREAS

Source: Verzoen: Capr Department of Agriculture

2.8 23: the settlement of Koelenhof



Figure 4: Koelenhof Proposal (SDF 2012)

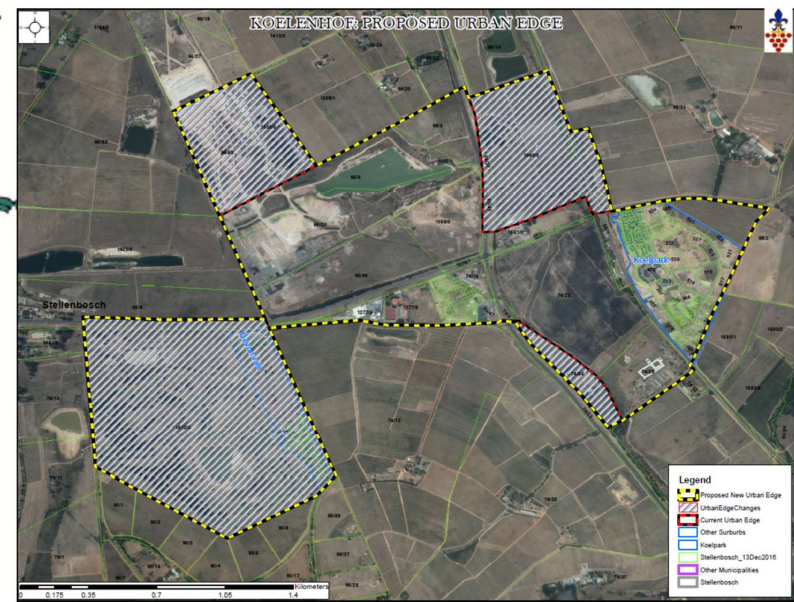


Figure 3: Koelenhof SDF Amendment 2017

We disagree with the proposed amendments as they are too large and trigger a number of sensitive areas such as significant CBA and wetland areas.

2.9 24: the settlement of Vlottenberg

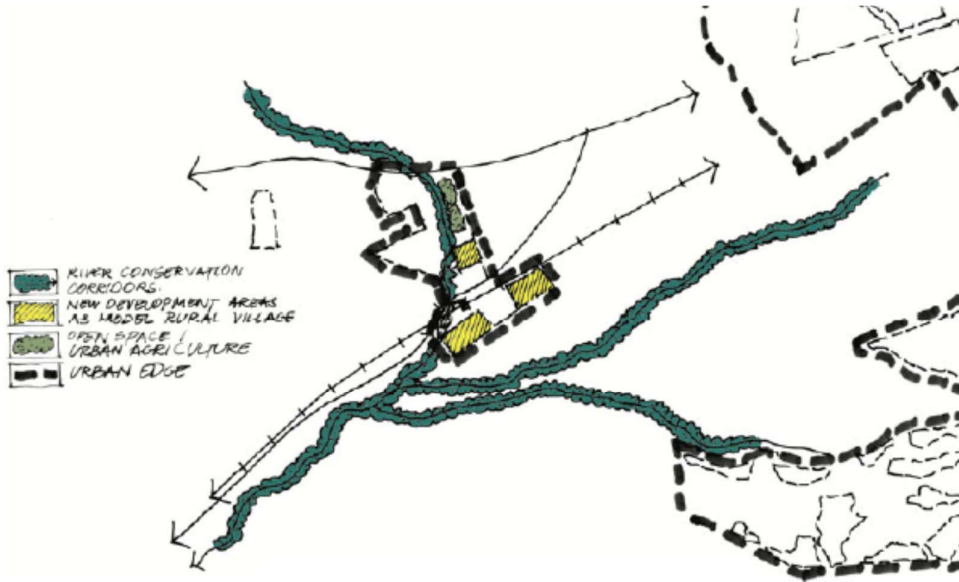


Figure 4: Vlottenberg Proposal (SDF 2012)

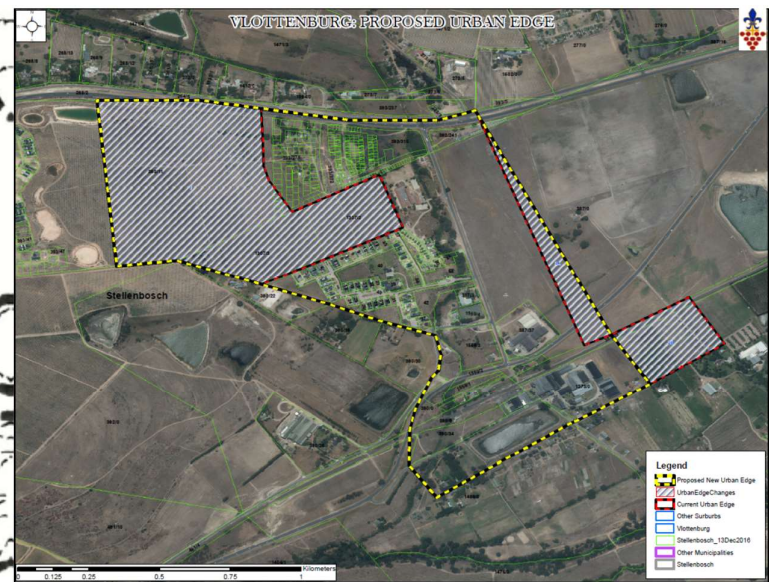


Figure 3: Vlottenberg SDF Amendment 2017 (SDF 2012)

As per 2.1, the Vlottenberg node is considered to be ideally situated to become a satellite settlement designed as an urban node. We agree to the amendments and would like to propose that the settlement be extended towards the north-east.

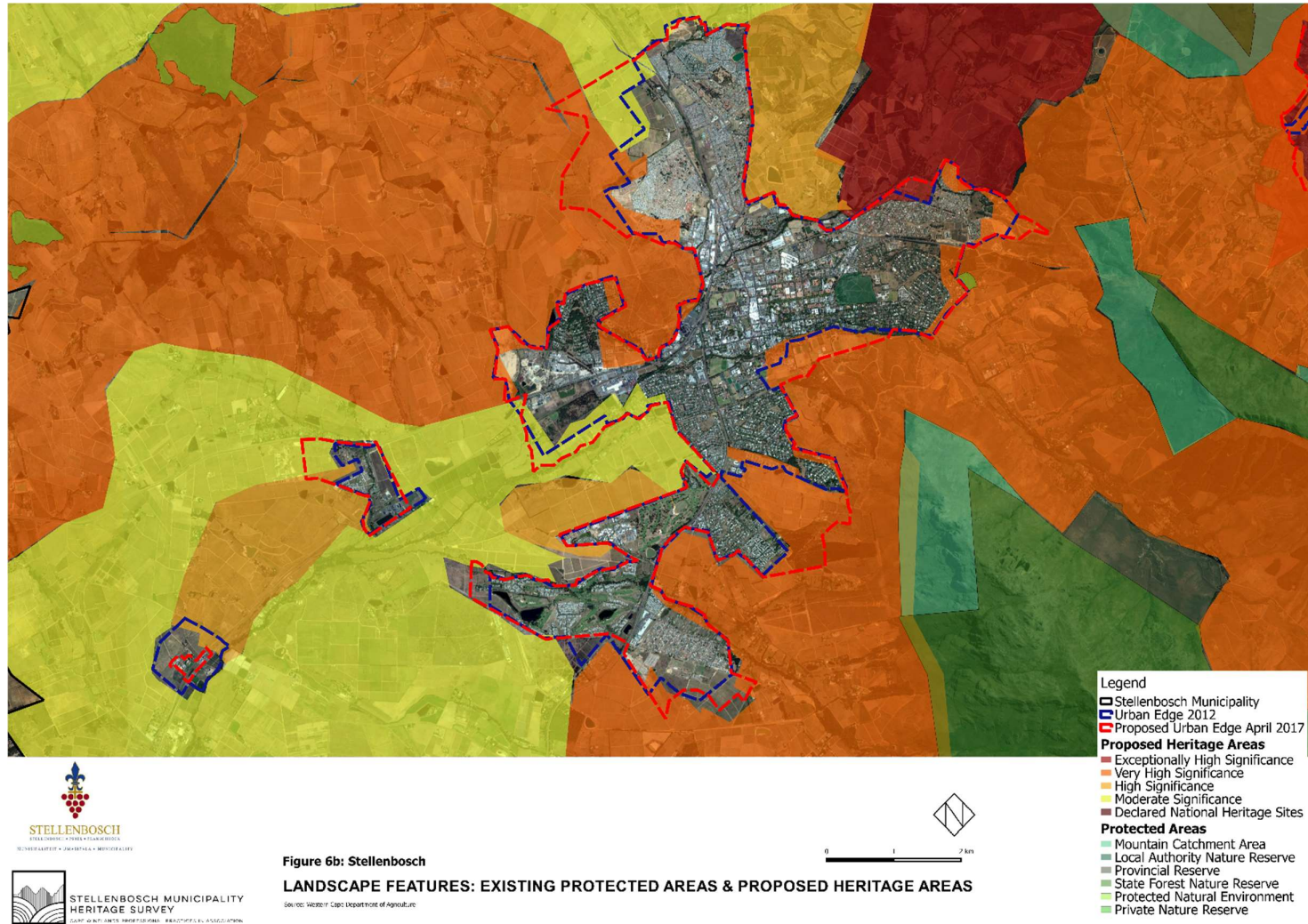


Figure 6b: Stellenbosch

LANDSCAPE FEATURES: EXISTING PROTECTED AREAS & PROPOSED HERITAGE AREAS

Source: Verwey: Cape Department of Agriculture



2.10 25: the settlement of Lynedoch

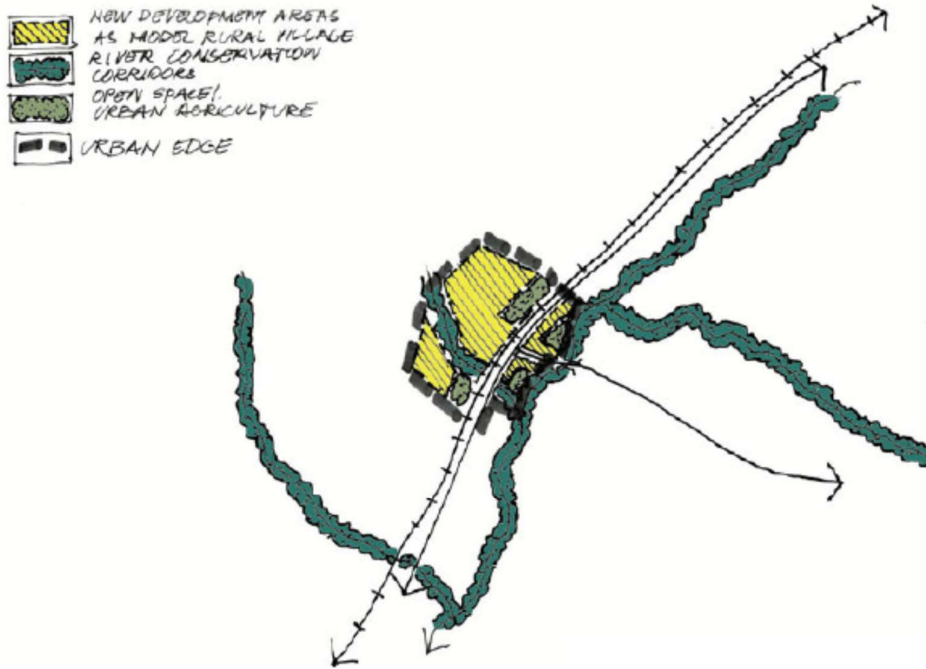


Figure 4: Lynedoch Proposal (SDF 2012)



Figure 3: Lynedoch SDF Amendment 2017

We agree with the proposed amendment.

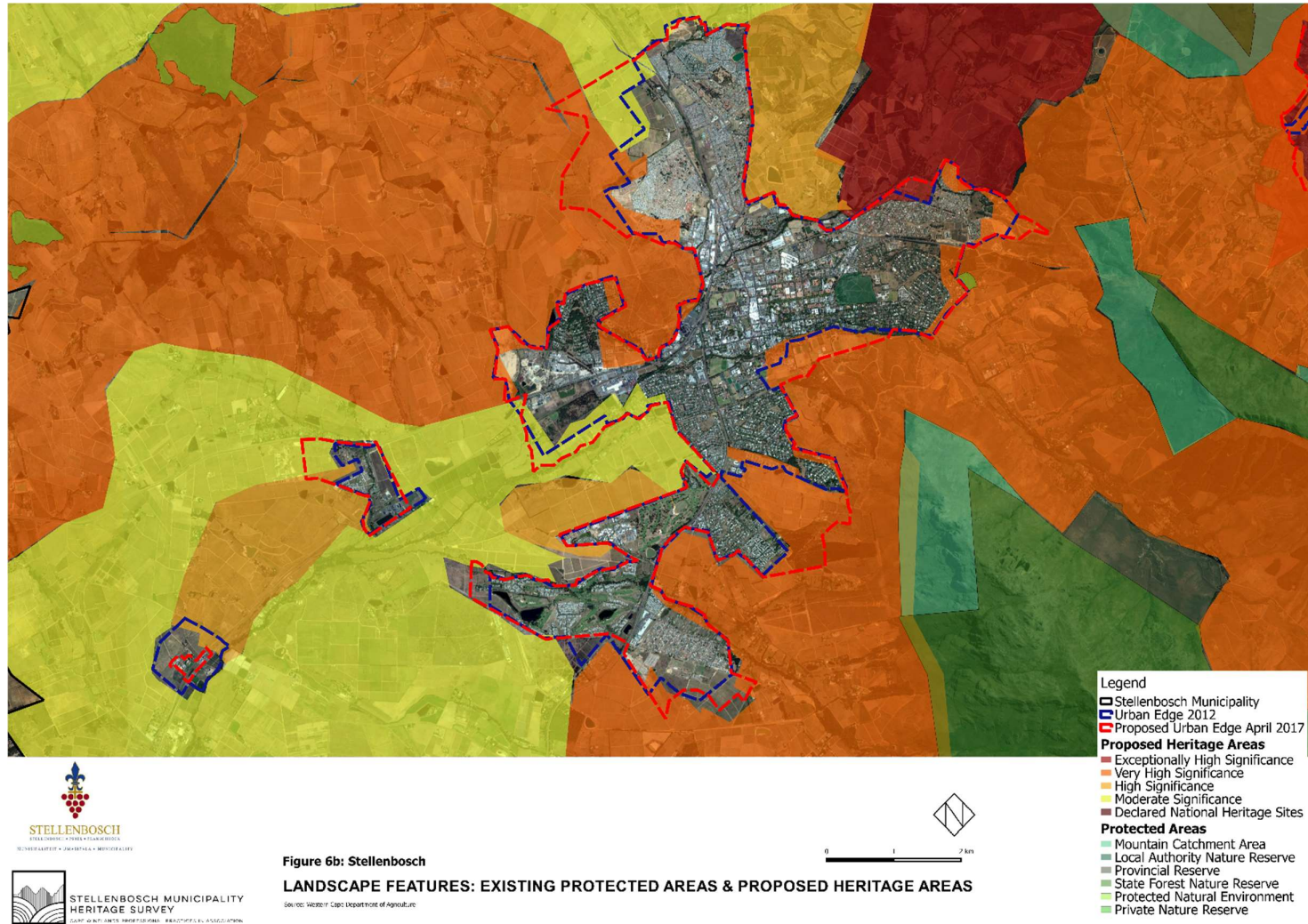


Figure 6b: Stellenbosch

LANDSCAPE FEATURES: EXISTING PROTECTED AREAS & PROPOSED HERITAGE AREAS

Source: Verwey: Cape Department of Agriculture



2.11 26: the settlement of Raithby

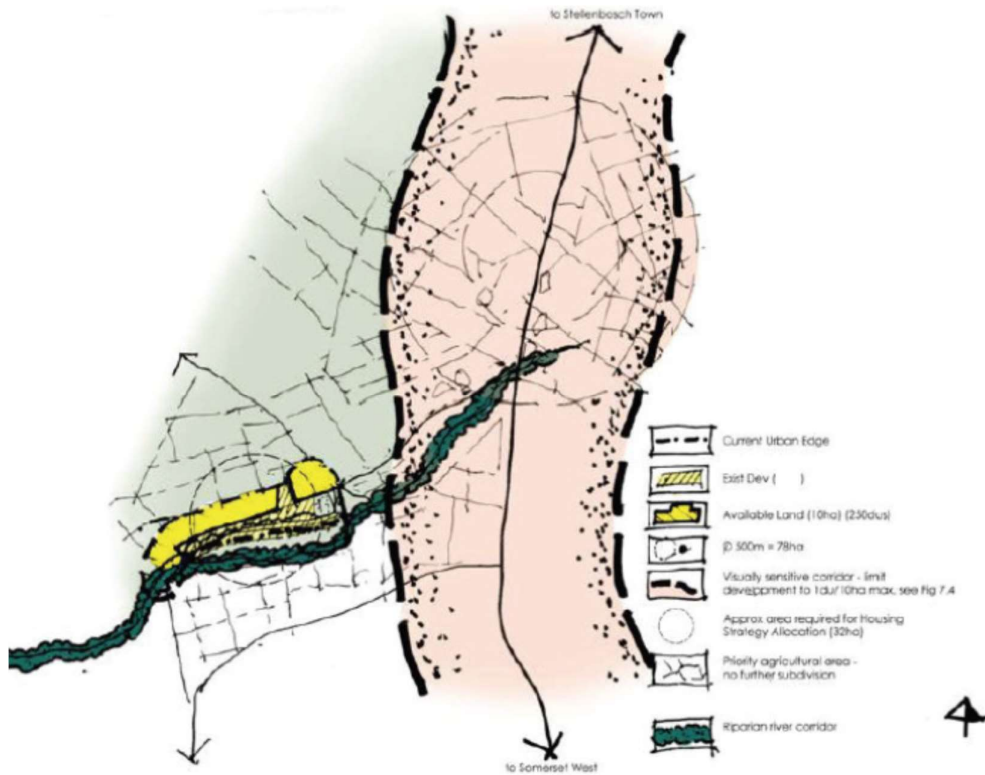


Figure 4: Raithby assessment and Proposal (SDF 2012)

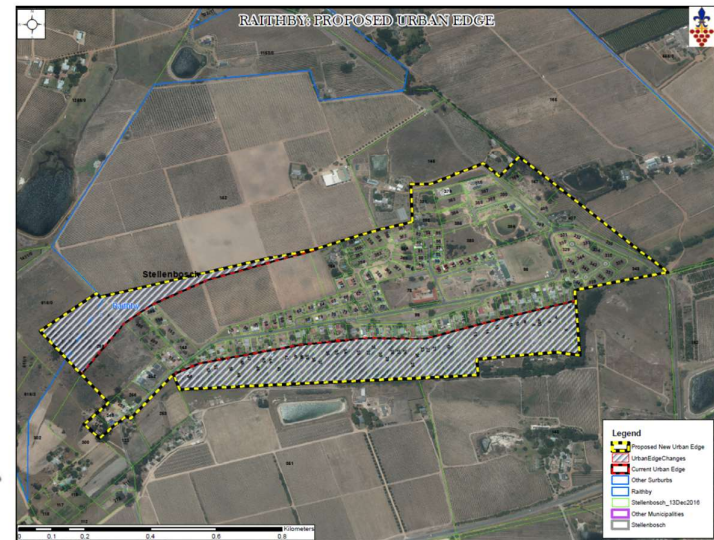


Figure 3: Raithby SDF Amendment 2017

We do not support the proposed amendment.

The extension of the urban edge to the south would obliterate the historically significant agricultural character of the area. It falls within a high significant heritage area.

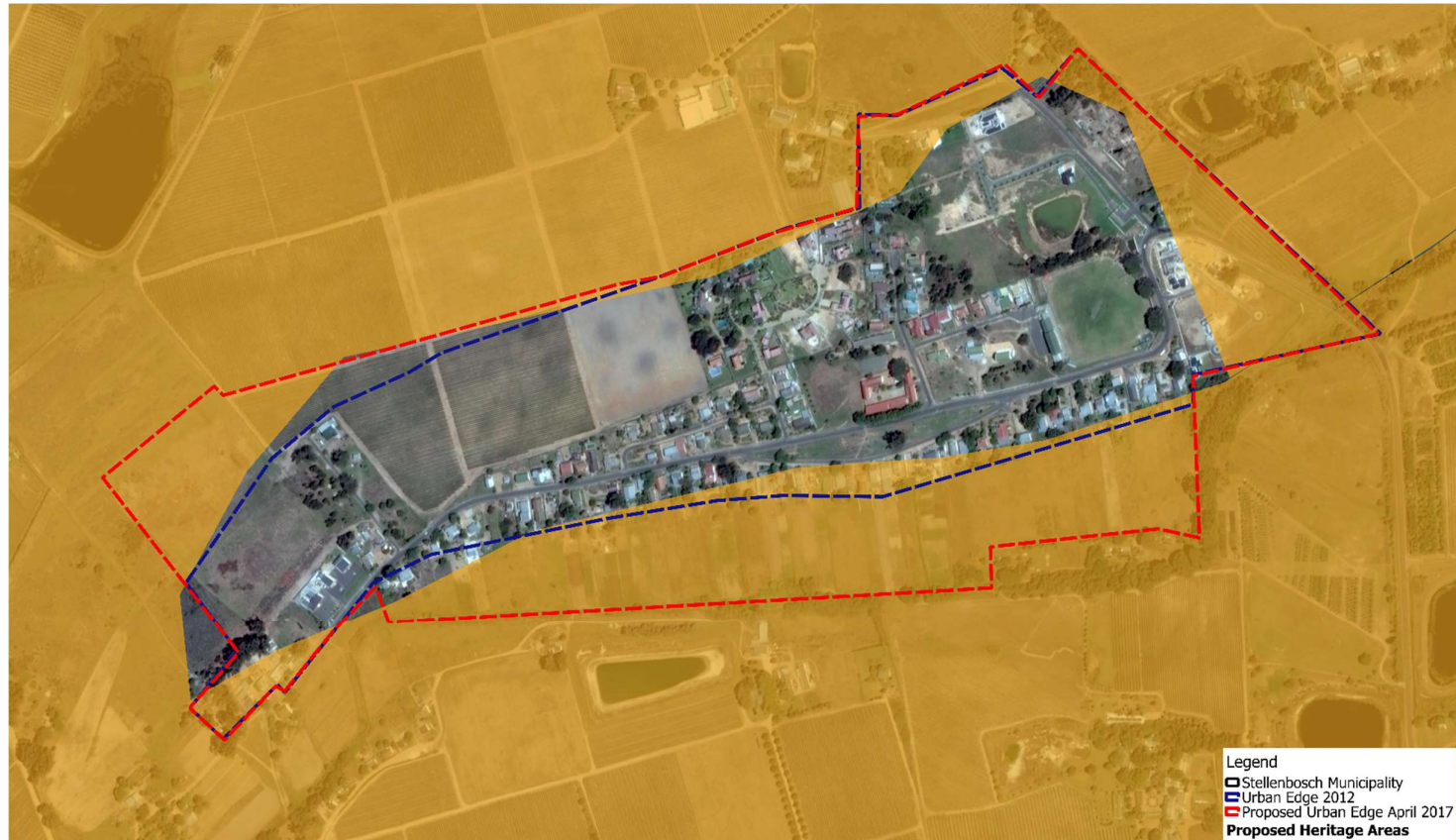


Figure 6i: Raithby

LANDSCAPE FEATURES: EXISTING PROTECTED AREAS & PROPOSED HERITAGE AREAS

Source: Verwey: Cape Department of Agriculture

3. *At Our Public Workshops Held on the 11 and 19 April 2017, Many Concerns were Expressed about the Proposed Amendments to the SDF by Participating Members of the Public*

Member of the public in general did not supported the proposed amendments to the SDF or the proposed Western Stellenbosch By-Pass.

Conclusion

The CWPPA gladly supports some of the proposals amendments but does not do so in respect of others, where they do not make sense in terms of the evidence at our disposal. Indeed, we object to some of the proposed amendments to the SDF, as they are not in the public interest.

As professionals in the Built Environment, we also cannot support the proposals related to the proposed Western Stellenbosch By-Pass. They were not ‘tabled’ in the drop-box made available for comment by the Stellenbosch Municipality in the past weeks, but were raised in the discussion at the last Inter-Government Committee meeting. We hereby attach comments prepared by the Cape Winelands Cultural Landscapes Working Group (CWCLWG), of which both principals of the CWPPA, Fabio Todeschini and Liana Jansen, are a part.

We strongly suggest that the Stellenbosch Municipality and its officials become acquainted with several documents issued by the National Treasury as part of its ‘Cities Support Programme’: in particular the “Guidance Note for the Built Environment Performance Plan (BEPP) 2016/17 – 2018/19”.¹¹ Although currently these documents are directed at South African Metropolitan Areas and the responsible city authorities, the guidance clearly speaks to a constructive and productive way forward, quite different from that which characterises the proposed amendments to the Stellenbosch Municipality SDF.

¹¹ Available at: https://csp.treasury.gov.za/Projectdocuments/BEPP%20Guidelines%202016_17.pdf

Comment on the Proposed Stellenbosch Western By-Pass by the Cape Winelands Cultural Landscapes Working Group

April 2017

THESE ARE NOT THE LATEST COMMENTS!!! PLEASE INSERT THE LATEST

The Cape Winelands Cultural Landscapes Working Group (CWCLWG) is an informal group of architects, landscape architects, heritage practitioners, urban and regional planners, other professionals and some business people who are concerned about the inclusive use of the value and quality of the cultural landscapes that comprise the Winelands. We have reviewed the proposal for a Western By-Pass for Stellenbosch, and its proposed alignment (fig. 1, page 4), and conclude that the proposed concept will not solve the problems it sets out to resolve and will have a negative impact which is not foreseen or dealt with in the proposal.

The reasons for this conclusion follow.

1. *It Will fail in its Own Terms*

The concept neither takes present patterns of movement into proper account nor distinguishes between through-traffic and trips that have Stellenbosch as origin and/or destination. Through-traffic is currently estimated to be in the order of 10% of trips. Moreover, many trips are generated by non-resident commuters who travel to Stellenbosch from Somerset West and, to a lesser degree from Paarl, because of the lack of affordable housing in Stellenbosch. In short, the root of the problem will not be remedied by a road by-pass: it is mainly a housing problem.

Urgent action (such as the write-down of land prices of public land) is required to enable younger people to enter the land market in Stellenbosch and its immediately associated settlements. The inevitable consequence of short-term (seemingly amelioratory) actions, such as the proposed by-pass, would be failure in their own terms: it may relieve congestion in the short-term but would, in the medium-term, inevitably clog. The costs to the public fiscus of this short-term gain would be enormous. The money could be better spent on promoting public transportation and beginning to solve the problem of affordable housing.

2. *Confusion over the Role of the R44*

There is currently great confusion over the role of the R44. It is unclear whether it should be: a mobility route (driven by the free and fast movement of motor vehicles); a scenic route (the classification it currently holds and which requires slower movement than a mobility route); or an urban arterial (the spine of an urban corridor). The by-pass proposal would implicitly entrench it as a mobility route. This issue of mobility requires elaboration.

Historically, the regional settlement pattern closely correlated with the evolving regional pattern of movement: starting with trails, wagon routes, roads and later rail. However, because of the volumes of traffic, a moment has been reached where a new pattern is required: where the mobility network of road should break away from the existing settlement patterns, so as to create a more neutral ‘mobility grid’, taking pressure off the settlements (the rail can help to create urban corridors, particularly if more stations are introduced). The alignment of this network is a regional planning issue. The network must be considered as a totality. Piece-meal approaches, such as the road by-pass proposal, only delay the necessary overall response, at great public cost.

The establishment of the mobility network would enable the R44 to play its appropriate role of a scenic route, except for relatively small, dense urban corridors being reinforced in close proximity to Stellenbosch and Somerset West at the respective ends of the R44. The infrastructure of the scenic route should be rural, not urban. A mindset change is required.

3. The Proposal Ignores Public Transportation

At the heart of the congestion problem in Stellenbosch is the fact that by far the dominant movement mode is the private vehicle. There can be no longer-term, sustainable improvement until this mindset is reversed.

The logical movement modes to be reinforced are public transport, the rail and road-based busses and taxi modes that should be feeders to rail stations: road-based movement should reinforce the railway line and the generative and dynamic role of rail-stations. This suggests that a logical growth path for Stellenbosch should be a non-continuous corridor of development to the north, towards Klapmuts, with intensive urban development occurring around stations, in a ‘beads on a string’ pattern. This pattern accords well with the adopted 2012 Spatial Development Framework (SDF) of Stellenbosch and the enunciated principles on which it is based, as well as with the goals of the New Urban Agenda (NUA) approved by the Habitat III Summit in Quito, Ecuador.

The by-pass proposal removes this option and runs entirely counter to the adopted Stellenbosch SDF. The large amounts of finance required to implement a by-pass would be far better spent in extending the rail network and its maintenance and ensuring road-based public transport feeders to its stations.

4. The Alignment of the Proposed By-Pass

The economy of Stellenbosch is strongly based on two sectors: agriculture and tourism. It makes good economic sense to protect and enhance these to the greatest degree possible. The proposed by-pass alignment, however, would negatively impact heavily on both. The proposed alignment for the four-lane by-pass snakes across the Eerste River valley and runs up the eastern reaches of the Devon Valley to the ridge-line north-west of the Papagaaiberg. It is visually highly intrusive and traverses some of the best agriculturally productive soils of the Western Cape. The alignment would cut through Heritage Areas already approved and protected by Heritage Western Cape.

This alignment is unacceptable from the perspectives of agriculture and of heritage. If implemented, it would negatively impact on the economic base of Stellenbosch.



Figure 1: Devonvale before and after the Khayamandi extension and Western Bypass

5. The Issue of the Urban Edge

Part of the by-pass concept is the proposal that all land between the existing settlement of Stellenbosch and the by-pass should be included in the urban edge. The crudity of this proposal will lead to unintended outcomes of enormous negative consequence.

As stated above, this land is of very high significance from both agricultural and heritage perspectives and it would negatively impact on the economy of the town. Further, the intention of an Urban Edge definition is to prevent lateral spread of settlement — this proposal would promote it. The definition of the Urban Edge requires careful judgment and analysis, based on issues such as efficiency, sustainability, equity and social justice, integration and resilience. The proposal makes no sense in terms of any of these. It is a throwback to planning of the 1960's and it is entirely in conflict with the principles enunciated in recent policies of the municipality, and provincial and national government.

Conclusion

The concept of the Western By-pass, and the related intention to expand the urban edge of Stellenbosch to include it, is unsuitable and inappropriate. The concept as it has been proposed and promoted in public should be scrapped on economic, urban planning, environmental and heritage grounds.

We have copied this correspondence to Heritage Western Cape, as we are of the opinion that the proposals would trigger the need for a heritage impact assessment in terms of the provisions of Section 38 of the National Heritage Resources Act.

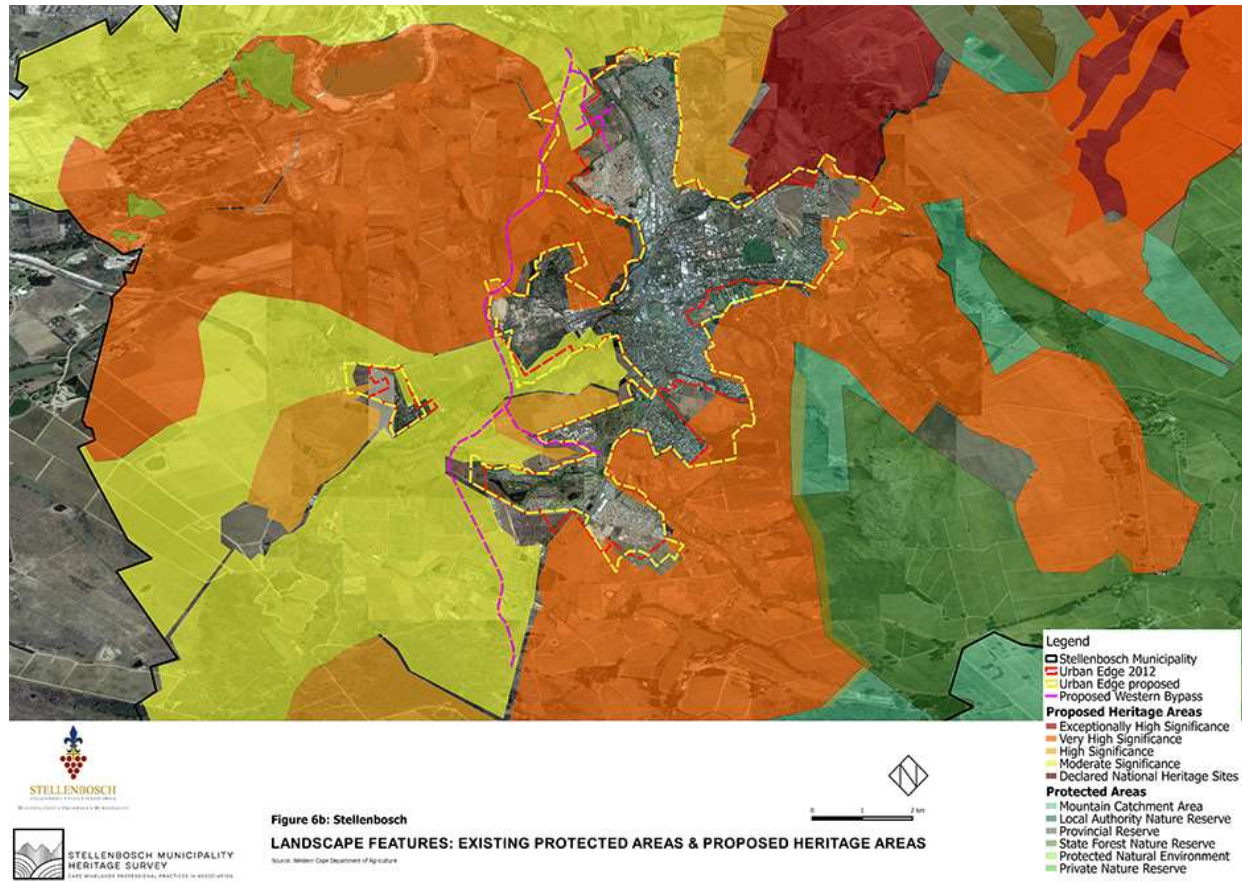


Figure 2: Protected Areas (including HWC approved Heritage Areas) with the proposed notional Stellenbosch By-Pass alignment and the proposed amendments to the Urban Edge. Courtesy Cape Winelands Professional Practices in Association, April 2017.