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From: Clifford Heys <Clifford@tv3.co.za>
Sent: Tuesday, 30 September 2025 08:58
To: idp
Subject: [EX] Comments of the IDP/MSDF
Attachments: TV3 letter [2025-09-30].pdf

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Madam

I refer to the Stellenbosch Municipality's notice calling for public comments on the 4th review of the 5th Generation Integrated Development Plan 2022-2027.

Find attached our comments pertaining to the Farm Brandwacht No. 1049, Stellenbosch.

A hard copy of our comments (including all the specialist reports) will be delivered to your office today.

Regards

Clifford Heys

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Our Reference: 3504-P

30 September 2025

Municipal Manager
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Attention: Ms. Geraldine Metler

Madam

COMMENTS ON THE 4TH REVIEW OF THE 5TH GENERATION INTEGRATED DEVELOPMENT PLAN 2022-2027: FARM BRANDWACHT NO. 1049, STELLENBOSCH

1. We refer to the Stellenbosch Municipality's notice calling for public comments on the 4th review of the 5th Generation Integrated Development Plan 2022-2027 which also includes the Stellenbosch Municipal Spatial Development Framework (MSDF).
2. We present these comments on behalf of Brandwacht Land Development (Pty) Ltd (hereinafter "the Applicant"), the registered owner of the Remainder of the Farm Brandwacht No. 1049, Stellenbosch (hereinafter "Rem. Farm 1049").
3. According to the 2023 Stellenbosch MSDF, Rem. Farm 1049 and Portion 3 (containing the manor house) are located outside the town's urban edge – see image below.

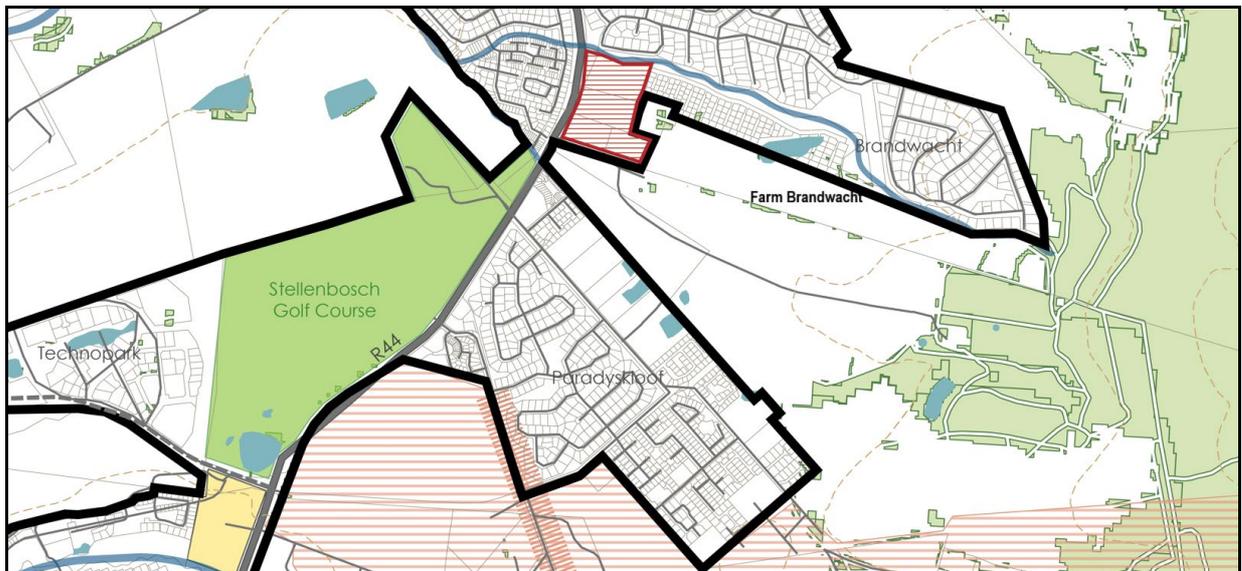


Figure 1: Insert of the Stellenbosch MSDF (2023)

4. We hereby request the amendment of the MSDF to include Rem. Farm 1049 within the urban edge of Stellenbosch and to earmark it for future urban development. The rest of the Farm is already fully developed.
5. It is important to note that in 2019 the final draft MSDF (that was submitted to the Council for approval) did include Rem. Farm 1049 in the urban edge and designated it for urban development, but it was subsequently removed by the Council (no reasons were given for the removal and exclusion) – see image below.



Figure 2: Insert of the final draft Stellenbosch MSDF (2019)

6. Since 2019, the Stellenbosch MSDF plan has not been amended.
7. Rem. Farm 1049 is strategically located adjacent to the existing built-up area of Stellenbosch town. The municipal Farm Grondves (portion whereof is leased to and being used by the KVV as an experimental farm) is located between Rem. Farm 1049 and Paradyskloof. Rem. Farm 1049 is therefore ideally positioned to contribute to a more compact urban form, in line with contemporary planning principles and the objectives of the MSDF – see image below.

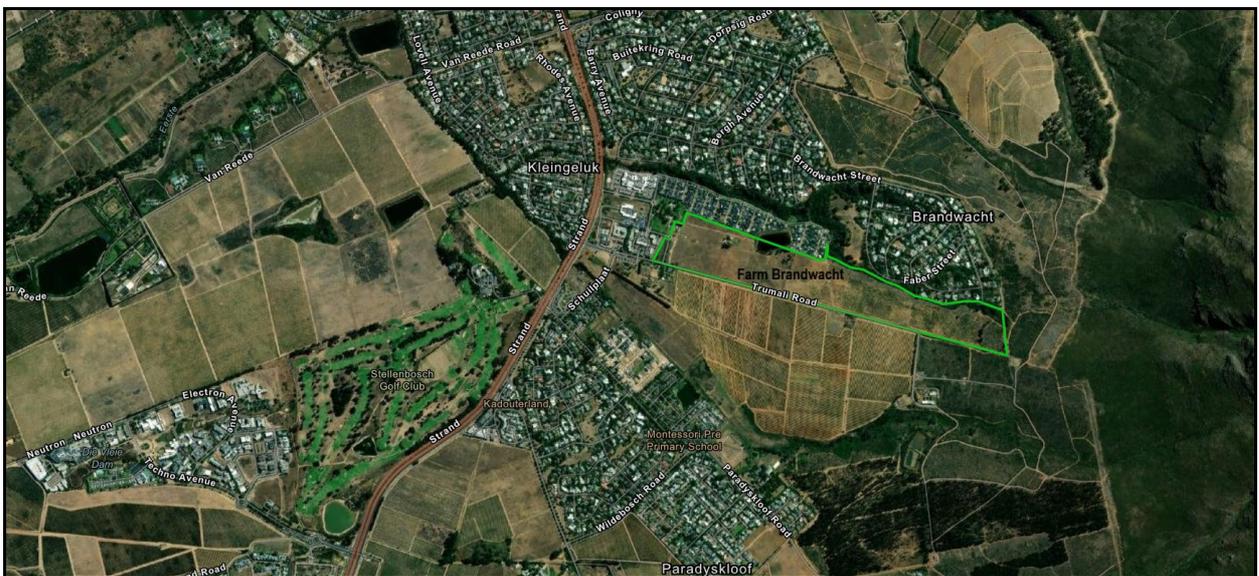


Figure 3: Locality of Rem. Farm 1049

8. The inclusion of Rem. Farm 1049 within the urban edge presents a unique opportunity to achieve sustainable and inclusive growth while addressing key spatial challenges facing the municipality. In terms of the current MSDF the only private land identified by Council for future (private) urban development is the Newinbosch Neighbourhood (± 40 ha), Farm Rivierplaas 72/2, Stellenbosch (± 30 ha), and the De Waldorf Retirement Village (± 5 ha). All other developable land belongs to the Stellenbosch Municipality and is identified primarily for low cost or social housing projects. The Newinbosch Neighbourhood is a mixed-use development with limited single title residential erven, and no planning applications have been submitted on Farm Rivierplaas. The proposed development of Rem. Farm 1049 will provide single title residential erven that will broaden the municipal tax base.

9. In support of this request to amend the MSDF, we highlight the following key considerations:

9.1 No-objection from the Departments of Agriculture

Both the Western Cape Government: Agriculture and the Department of Agriculture, Land Reform and Rural Development (DALRRD) indicated that they have no objection to Rem. Farm 1049 being designated for residential development.

Rem. Farm 1049 is located inside the boundary line of land that does not need to be preserved for agricultural use, on a plan commonly referred to as the “*agricultural urban edge*” plan. The “*agriculture urban edge*” plan is a guideline used by the Western Cape Government: Agriculture to determine if agricultural land should be developed for urban purposes, and according to their guideline Rem. Farm 1049 should be developed for urban purposes – see image below.

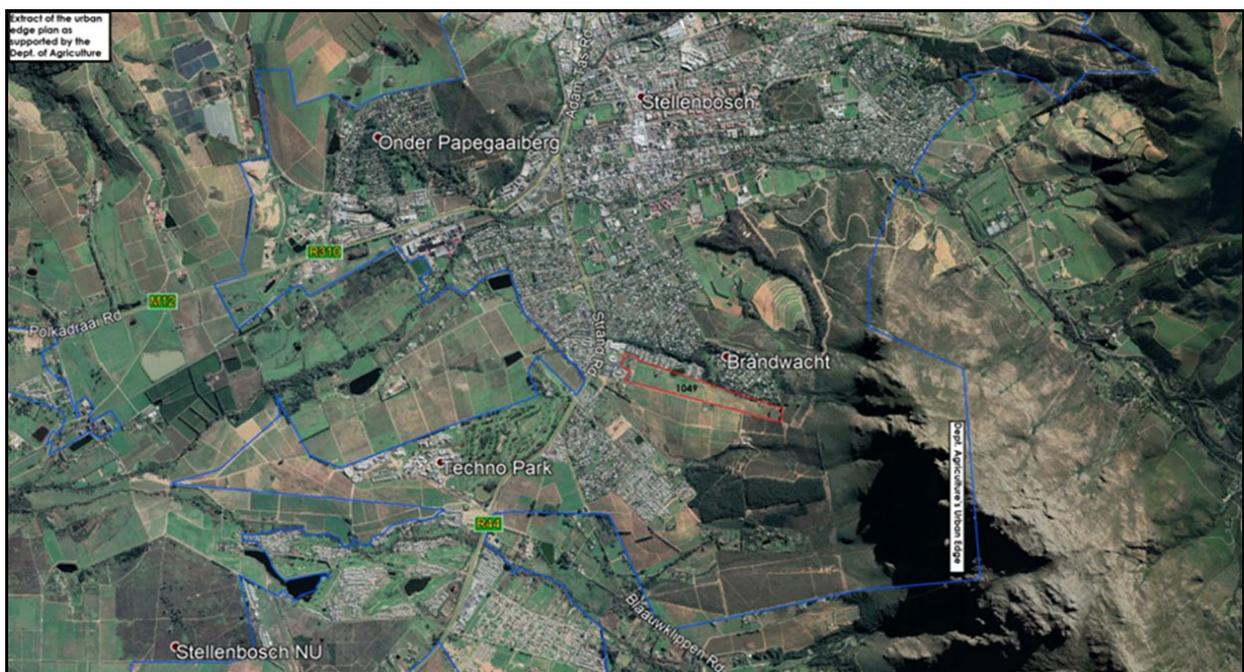


Figure 4: The “*agriculture urban edge*” plan

In their letter of 3 May 2021, the Western Cape Government: Agriculture stated, “*In letters dated 2019/04/17 and 2019/07/02 the WCDoA had no objection to the inclusion of Remainder of Farm Brandwacht No 1049, Stellenbosch for residential development respectively*” (we do not have copies of the letters referred to). A hard copy of their

letter of no-objection will be submitted to your office.

In their letter of 4 February 2024 the DALRRD stated, "*The Department has no objection against the proposed rezoning for a township from an agricultural point of view*". A hard copy of their letter of no-objection will be submitted to your office.

9.2 Limited Agricultural Potential

An agricultural assessment indicated that Rem. Farm 1049 has dubious agricultural value, with no potential for viable long-term commercial farming.

A critical element in farming is the availability of sufficient irrigation water. Rem. Farm 1049 has no water allocation from an irrigation scheme and relies on the existing storage dam that is fed by runoff from the Brandwacht Stream. The Brandwacht Stream provides water during the winter months, but during the summer months the Brandwacht Stream only flows occasionally. Without a consistent reliable water supply the prospects for long term crop production are limited.

Furthermore, Rem. Farm 1049's location next to existing urban areas and the possible fragmentation by the proposed Eastern Link Road, reduces its agricultural quality.

According to the Western Cape Government: Agriculture's guidelines a viable agricultural land unit in the winelands requires ± 40 ha of arable land with sufficient irrigation water. Rem. Farm 1049 only has ± 25 ha of arable land and limited irrigation water. In other words, Rem. Farm 1049 is considered by the Western Cape Government: Agriculture's guidelines a non-viable agricultural land unit.

If Rem. Farm 1049 is unsuitable to be effectively farmed, then urban development is the only sensible alternative land use for the property.

9.3 Promotion of a Compact Urban Form

Incorporating Rem. Farm 1049 into the urban edge will promote a compact urban form for the town and enable an infill development project that aligns with spatial restructuring goals and discourages urban sprawl.

9.4 Support of the Adam Tas Corridor Overlay Zone

One of the Stellenbosch Municipality's catalyst projects is the Adam Tas Corridor Overlay Zone (ATC). Although the ATC primarily envisions flats and high-density developments, the inclusion of single residential and group housing erven on Rem. Farm 1049 complements this vision by expanding housing supply to include single title erven, creating a diverse and inclusive urban fabric, supporting gradual urban densification, and contributing to the structured, sustainable growth of Stellenbosch. Thus, this development can be seen as a supportive component of the ATC strategy, enhancing its social, spatial, and economic objectives.

9.5 Limited Traffic Impact

A traffic impact assessment (TIA) was undertaken by UDS transport engineers in 2024. According to their TIA report the urban development of Rem. Farm 1049 will have a limited traffic impact, and *"it is recommended that the proposed development on Remainder Farm Brandwacht no 1049, Stellenbosch, be supported from a traffic point of view"*. The TIA report also indicates that the proposed development of Rem. Farm 1049 does not rely on the construction of the Eastern Link Road. A hard copy of the TIA report will be submitted to your office.

9.6 Availability of Engineering Services

In 2025 BSI civil engineers undertook an investigation on the availability of engineering services for the proposed development of Rem. Farm 1049. According to their civil services report, the *"required basic civil engineering services for the proposed development, i.e. potable water, sewerage and solid waste removal can be accommodated by the Stellenbosch Municipality in their existing infrastructure,*

alternatively in the upgrades according to the master planning". A hard copy of the civil services report will be submitted to your office.

9.7 Addressing Housing Needs and Backlog

The development of Rem. Farm 1049 will provide a balanced mix of housing typologies, which will contribute to reducing the town's housing backlog.

9.8 Positive Socio-Economic Impact

The proposed development will stimulate local employment during both the construction and operational phases and will broaden the rates base of the municipality. In 2024 Multi-Purpose Business Solutions undertook a socio-economic impact assessment of the proposed Rem. Farm 1049 development. In their report they concluded that the proposed development would have a positive socio-economic impact and that, *"the socio-economic benefits of the preferred development alternative outweigh the potential costs, and no fatal flaws from a socio-economic perspective are identified or envisaged whether the preferred or alternative development option is considered"*. A hard copy of the socio-economic impact assessment report will be submitted to your office.

9.9 No Loss of Critical Biodiversity Areas

In 2024 Capensis undertook a botanical assessment of Rem. Farm 1049. In their botanical report they concluded:

- *"The only developable portion of the site that supports Cape Winelands Shale Fynbos (no Swartland Shale Renosterveld remains) is heavily modified (degraded) and only supports a few disturbance-tolerant and pioneer species. This area, on the upper slopes abutting the western boundary, could be restored but at significant effort and cost (medium restoration potential), which is not justified in my opinion. Effort should rather be placed on restoring the ravine and watercourse. This should include (1) stabilization of the ravine slopes, where large pines have caused severe erosion, (2) removal of invasive and exotic species, and (3) reintroductions of key species such as wild olive and wild peach. If this condition can be met the development is supported from a botanical perspective"*.

A hard copy of the botanical assessment report will be submitted to your office

9.10 Limited Visual Impact

In 2024 Terra+ Landscape Architects were appointed to assess the visual impact of the proposed Rem. Farm 1049 development. In their preliminary visual impact assessment report, they concluded:

- *“Subject to the implementation of proposed architectural mitigation measures and Landscape Plan as recommended above, the proposed development known as Brandwacht-aan-Berg is recommended for approval”.*

A hard copy of the preliminary visual impact assessment report will be submitted to your office.

9.11 Heritage Impact

A heritage consultant has been appointed to undertake a heritage impact assessment of the proposed development.

9.12 Planned Infrastructure Development – Eastern Link Road

If the Eastern Link Road is constructed, as identified in the municipal transportation plans, it will traverse the property, effectively bisecting it. The applicant does not support the construction of the Eastern Link Road, nor does the proposed development on Rem. Farm 1049 rely on it.

10. Considering the above, we respectfully request that the Stellenbosch Municipality initiate the necessary process to amend the MSDF, to include the Remainder of the Farm Brandwacht No. 1049, Stellenbosch inside the urban edge, and to designate it for future urban development purposes. We are confident that such an amendment will be in line with the municipality’s strategic objectives and will support a more sustainable, inclusive and spatially just Stellenbosch.

11. GNEC Environmental Consultants are busy with the environmental impact assessment to obtain approval for the development of Rem. Farm 1049 i.t.o. the National Environmental Management Act, 1998.

12. We trust the information will suffice in processing our request. However, please feel free to contact the undersigned at 021 861 3800 or clifford@tv3.co.za if you have any queries or require any additional information.

Yours faithfully



CLIFFORD HEYS
TV3 PROJECTS (PTY) LTD

Our Reference: 3504-P

30 September 2025

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1. We refer to our letter of 30 September 2025 commenting on the 4th review of the 5th Generation Integrated Development Plan 2022-2027 which also includes the Stellenbosch Municipal Spatial Development Framework (MSDF).
2. In our letter of 30 September 2025, we requested the amendment of the MSDF to include the Remainder of the Farm Brandwacht No. 1049, Stellenbosch (hereinafter “Rem. Farm 1049”) in the urban edge of Stellenbosch and to earmark it for future urban development as the rest of the farm is already fully developed.
3. It is important to remember that in March 2019 the Council advertised the draft Stellenbosch MSDF for public comment. The draft MSDF included Rem. Farm 1049 in the urban edge and identified it for future urban development – shown in yellow on the map below.



Figure 1: Extract of the draft MSDF (Mar 2019)

4. In June 2019 the final draft MSDF was advertised for public comment. The final draft MSDF also included Rem. Farm 1049 in the urban edge and identified it for future urban development and urban agriculture – shown in yellow and green on the map below.

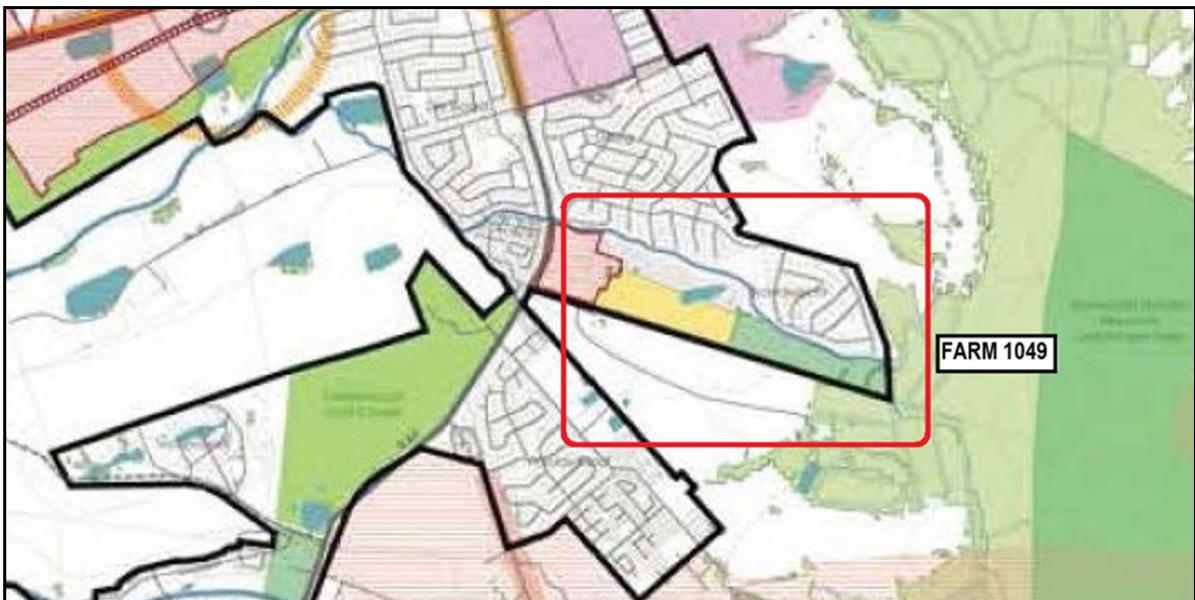


Figure 2: Extract of the final draft MSDF (Jun 2019)

5. In August 2019 the final draft MSDF served before the Council for adoption. At this meeting the Council adopted the MSDF but despite the findings of the team of independent town planning consultants and the municipal town planning officials, decided to exclude Rem. Farm 1049 from the urban edge (no reasons were given for the removal and exclusion) – see map below.

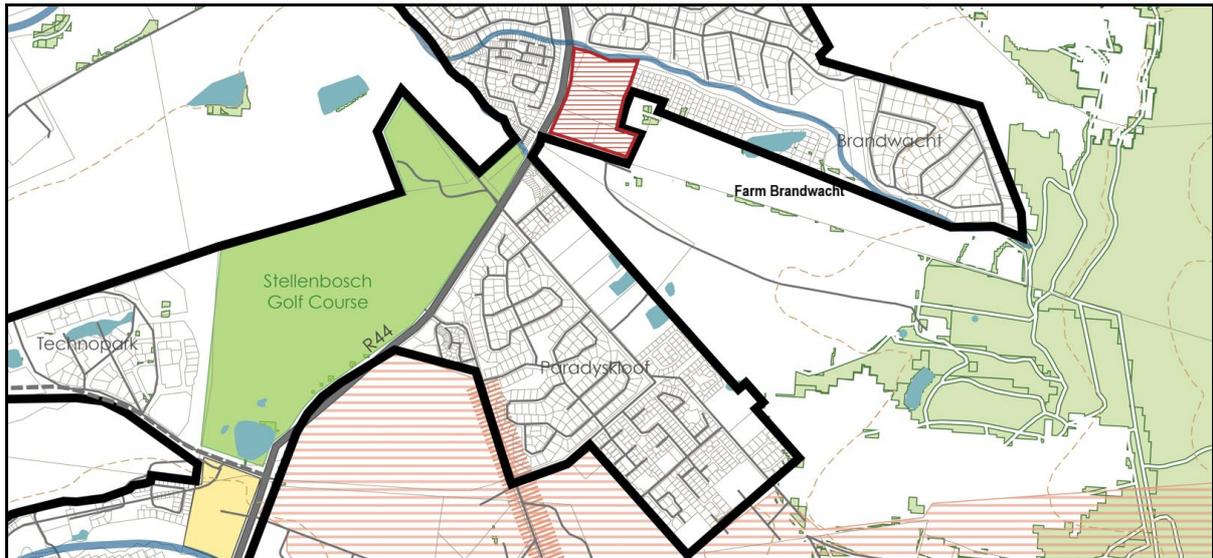


Figure 3: Extract of the adopted Stellenbosch MSDF (Aug 2019)

6. Based on the planning studies and investigations undertaken by the team of independent town planning consultants and the municipal town planning officials to prepare the MSDF, the inclusion of Rem. Farm 1049 in the urban edge was considered desirable. Despite the findings of the team, the Council decided to exclude Rem. Farm 1049 from the urban edge. The historic exclusion of the subject property from the urban edge was therefore based on a decision of the Council, and not on the findings of the team.

Yours faithfully



CLIFFORD HEYS

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