

ANNEXURE E7: COMMENT FROM WCG: DOA

OUR REFERENCE : 20/9/2/5/6/956
YOUR REFERENCE : -
ENQUIRIES : Corvan der Walt

Virdus Works

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FOR ATTENTION: DUPRE LOMBAARD

**APPLICATION FOR EXTENSION OF MUNICIPAL AREA OF JURISDICTION FOR LAND INSIDE OF
A DESIGNATED URBAN AREA: DIVISION STELLENBOSCH
PORTION 28 OF THE FARM WELMOED ESTATE NO 468**

Your request for comment on the Agricultural Impact Assessment (AIA) of 05 June 2023 for PORTION 28 OF FARM 468, STELLENBOSCH, has reference.

During the review of the 2019 Stellenbosch Spatial Development Framework, the Western Cape Department of Agriculture (WCDoA) on 17 April 2019 did not support the inclusion of the subject property into the urban edge of Lynedoch, Stellenbosch, due to the subject property having a high agricultural value and being worthy of preservation for agricultural purposes.

The WCDoA is of the opinion that the land should still be preserved for agriculture based on the following reasons:

- a) Portion 28 of Farm 468, Stellenbosch has a long history of being cultivated with wine grapes and has the same land capability and suitability as the abutting farms, which continue to be farmed individually or collectively with other farms.
- b) Although it is argued that no irrigation water is available, *"the water requirement of wine grapes is lower than most other perennial crops and soils with high water retention capacity are capable of storing sufficient water to sustain wine grape production, but at reduced yield levels"* (Agri-Informatics). Large areas in the Western Cape are successfully farmed with dryland vineyards.

- c) The ground water storage for the deep Vilafontes and Oakleaf soils, together with climatic conditions, will sustain wine grape production under dryland conditions. It is also widely accepted that high quality wine grapes are produced under dryland conditions, although at a lower yield but at higher prices. The findings of the AIA are that *"the soils of the study area are generally moderately to well drained, of medium to good depth with good to moderate water retention capacity"*. In consideration of the aforesaid, the WCDoA does not agree with the finding that *"the overall agricultural potential of the study area is evaluated as being low and unviable, unless an additional source of irrigation water can be sourced"*. Even without an additional source of irrigation water, the land is deemed to have a medium overall agricultural potential with the exception of the Westleigh, Katspruit and Glenrosa soils.
- d) The questions surrounding the current and future availability of irrigation water have not been adequately resolved. The fact that supplementary irrigation was available and used in the past but has been neglected or lost is not regarded as motivation for a change in land use out of agriculture. The ground water has not been scoped, drilled or tested and there is, therefore, no evidence of a lack of groundwater.
- e) The AIA addresses the lifespan of vineyards and profitability thereof. This is not a long-term argument and only reflects the present situation. The fact that old vineyards were not replaced with newer cultivars and better soil preparation methods is not regarded as motivation for introducing other land uses. In terms of the data, the youngest vineyard is 20 years old and the oldest 43 years, with an average age of 34 years. Given that vines have an average commercial productive lifespan of 20-25 years, the yield will naturally decrease over time.
- f) Furthermore, with an average lifespan and in terms of profitability: i) all agricultural commodities undergo fluctuations in terms of supply and demand and thus ultimately price and profitability and ii) although farm size plays an important role, it is generally accepted that farming enterprises comprise more than one farm/cadastral unit, to be considered viable. The size of the individual land unit, therefore, becomes insignificant and the focus shifts to land capability and land suitability.
- g) The WCDoA does not agree with the statement that *"being a grape farm, the land does not directly contribute to food security..."*. The fact that a particular crop *"does not directly contribute to food security"* does not have a bearing on the agricultural production potential and sustainability of an agricultural land unit.
- h) The statement that *"it is believed that a development on this site will contribute to the retention of higher value agricultural resources elsewhere in the Stellenbosch or surrounding municipal areas and is therefore supported"*, is unsubstantiated.

i) The WCDoA considers this application as premature from a spatial development perspective and the inclusion of this property within the municipal area of jurisdiction is, therefore, not supported.

Please note:

- That this is comment to the relevant deciding authorities in terms of the Subdivision of Agricultural Land Act 70 of 1970.
- Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.
- The Department reserves the right to revise initial comments and request further information based on the information received.

Yours sincerely



Mr. C.J van derWalt

LANDUSE MANAGER: LANDUSE MANAGEMENT

2023-09-13

<u>Copies:</u>		
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