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FRIENDS OF STELLENBOSCH MOUNTAIN

## Objection to the proposed parking garage and PPP on Erven 1962/RE, 1969–1976, 1952, 6402 and 6636 26 February 2024

Friends of Stellenbosch Mountain (FSM) objects to the proposal to erect a parking garage, by any mechanism whatsoever, on “the Precinct” comprising Erven 1962/RE, 1969–1976, 1952, 6402 and 6636 as advertised by Enviropart and studied by consultants SMEC. Reasons are set out below. **The parking garage proposal should be rejected and a new process must be started** to find a use for the Precinct which is compliant and in line with the relevant legislation, the MSDF and the ATC and which would benefit the people of Stellenbosch.

1. **Scope too narrow:** The SMEC study is too limited in scope:
  - 1.1 It considers the small Central Business District (CBD) in isolation while mobility is a long-range and integrated issue.
  - 1.2 The study focuses exclusively on cars and parking as an option for the Precinct while there would be important other uses.
  - 1.3 The study ignores the reasonable alternative sites for parking outside the CBD.
2. **Incorrect premises void the conclusions:** Since the premises of the 2023/2024 SMEC study and the 2020 Parking Report are fundamentally incorrect, any resulting conclusions and recommendations are also incorrect.
3. **Noncompliance:** The 2023 SMEC study and the proposed Eikestad PPP project should be withdrawn because it is not compliant with the MSDF principles or projects and the associated Adam Tas Corridor (ATC) projects and the underlying legislation.
  - 3.1 The parking garage proposal incorrectly assumes that there is a “need” for parking in the CBD while the real need would be Park-and-Ride facilities at (for example) Droë Dyke, the Stellenbosch Central Station, along the R44 (Technopark or Jamestown) and Idas Valley. Relevant extracts from the MSDF appear in Appendices A and B. Regarding real needs in the CBD see Item 8.
  - 3.2 A parking garage in the CBD makes it harder to achieve the MSDF and ATC goals because it incentivises private car parking in the CBD and sabotages necessary changes in human behaviour patterns; see Item 10.
4. **Parking garages on the periphery, not in the CBD:** Park-and-Ride facilities on the periphery of town form an integral part of the long-term solution. Such Park-and-Rides could be multi-level garages; this would minimise the distance from the parking bays to the nearby public transport.
5. **PPP on the periphery** The park-and-ride sites on the periphery are the natural place to implement Section 78 Public-Private Partnerships. This would correctly incentivise

motorists to make use of the peripheral sites and parking service providers to integrate with Transit-Oriented Development.

6. **Duration of contract:** The SMEC study talks about municipal risk but forgets the risk inherent in long-term contracts. These are dangerous and must be avoided. Mobility needs and constraints are changing rapidly. Stellenbosch must not be locked for decades into a contract which fundamentally prevents necessary changes. It must retain options to redevelop existing and future parking spaces as needs change — as they should and will — towards public transport and NMT.

7. **Stellenbosch Municipality is already spending far too much money on cars:** Any Council approval of the proposed parking garage would worsen misallocation of budget money. Contrary to claims in the parking studies, Stellenbosch Municipality does have a lot of funds to spend on mobility: about R1.1billion in specific projects over the next three is earmarked for roads and road-related projects. This money should of course not be spent on CBD parking garages either but on those measures and projects which would make the CBD parking garage unnecessary. See Appendices C and D, especially the table of costs.

## 8. Social justice

8.1 A parking garage would penalise the poor and benefit the rich. According to the Stellenbosch IDP, 59 percent of the Stellenbosch population falls below the Poverty Line. The cost of ownership of a car is beyond the financial means of most Stellenbosch residents; their need is not roads and parking but effective and safe public transport. A parking garage in the town centre will worsen existing inequality; it will be built solely to service and convenience the wealthy segment of Stellenbosch society.

8.2 The land now making up the Precinct had been owned by members of the Coloured community prior to their eviction during the apartheid era. Its past history of social injustice may not be repeated but must be rectified. The land in question should therefore benefit the people, not PPP investment consortia and Eikestad Mall shareholders whose only interest is profit, not social justice or liveable town spaces.

8.3 The number of additional jobs created by a parking garage is negligible compared to the economic penalties imposed on the poor resulting from a parking garage.

## 9. Economic benefits: Who benefits?

9.1 The greatest beneficiary of the proposed parking garage PPP would be owners and shareholders of the adjacent Eikestad Mall. This is not acceptable.

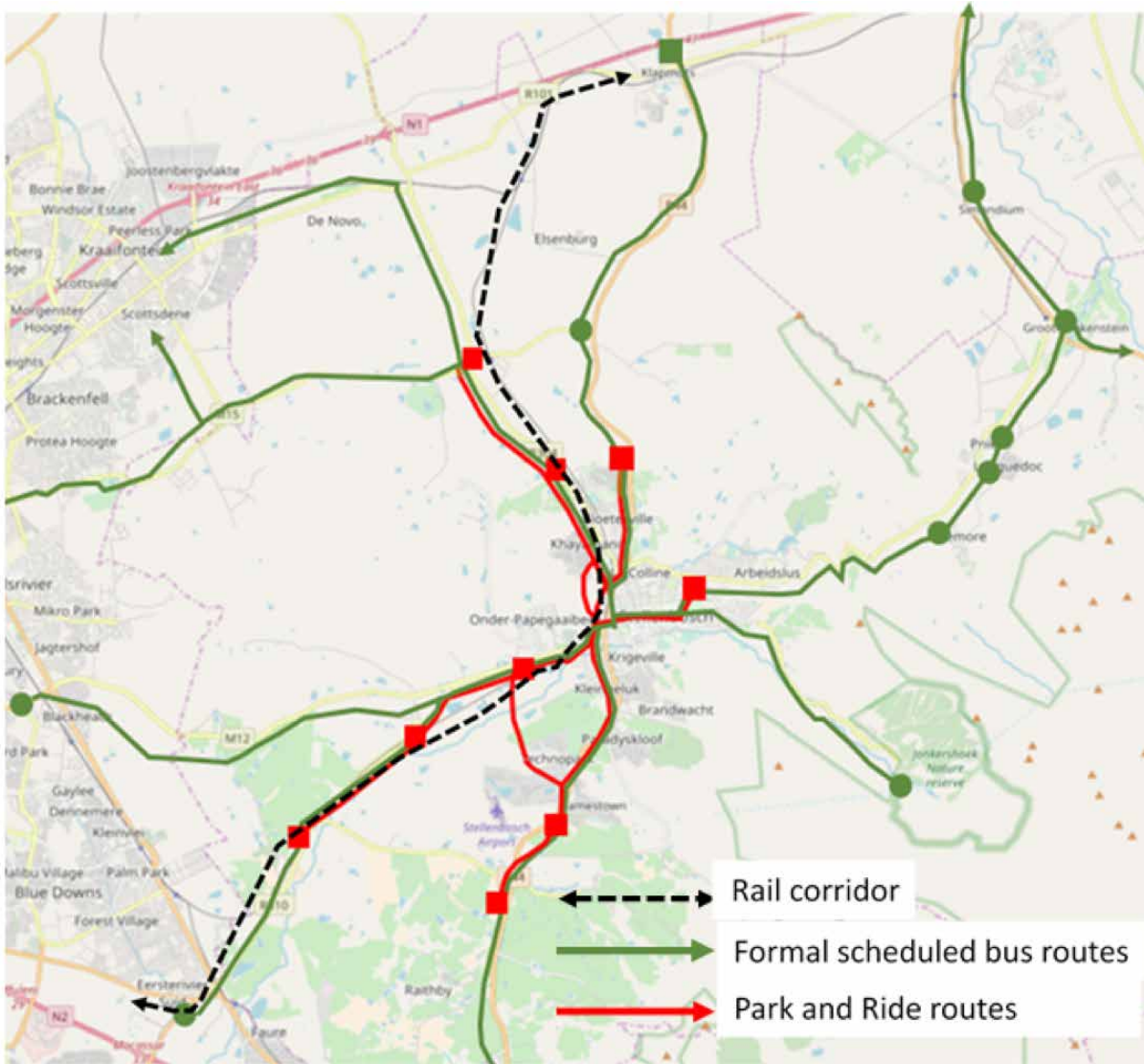
9.2 A more people-friendly (and not car-friendly) use of the Precinct would also benefit tourism and the historical buildings nearby like Erfurt House, the Stellenbosch Museum and others.

9.3 **No alternative considered** for development of the Precinct: The 2020 Parking Report and the current parking study has looked only at economic benefits of the parking garage but never considered economic benefits of alternative land uses for the Precinct. For example, many more jobs could perhaps be created by a LED hub on the site. **Ranyaka** is a good example of what is possible in the CBD.

## 10. Engineering versus behavioural changes

The solution to the large number of commuters and congestion is well known and documented: Change the unsustainable one-person-per-car current patterns by exerting all sorts of pressure on commuters to change their behaviour: increasing the occupancy ratio of cars, use of public transport, lift clubs, high parking costs, etc. **Travel Demand Management** (TDM) is absolutely necessary. The proposed parking garage would sabotage current and future TDM measures by making it easy and convenient to continue with current unsustainable patterns of behaviour.

# A MSDF Figure 50: Park and Ride sites (red squares)



## B Relevant parts of the Municipal Spatial Development Framework

1. Section 6.6.2 of the approved Stellenbosch MSDF is clear on the subordinate role of parking in mobility. Here are some quotes:

**Priority Trends** [Priority for Stellenbosch Town:] *Public transport development, travel demand management, parking controls, and NMT improvements. “Parking controls” and “Travel Demand Management” both imply lessening, not increasing, parking in the CBD.*

**Adam Tas Corridor** Section 6.9.1. of the MSDF sets out the catalytic role of the ATC also with respect to transport and parking. Some quotes:

- *Remote parking facilities will form part of the corridor concept, with passengers transferring via public transport, cycling and walking to reach destinations within the town of Stellenbosch.*
- *Accommodate the parking of vehicles on the edge of town whilst the corridor provides for and promotes a greater focus on pedestrianism and cycling into the core town.*

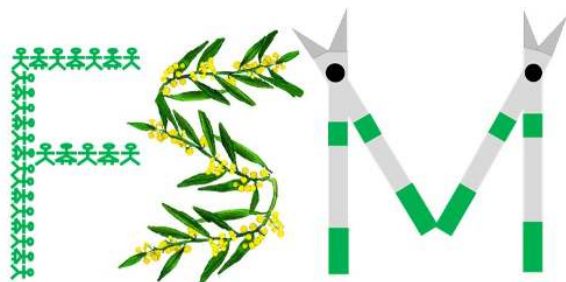
**Park and Ride as priority** (MSDF Section 6.6.2.4) *Park and ride sites along arterial routes are a top priority for development, allowing current private car commuters the option of driving to these nodes from where demand thresholds will enable a combination of public shuttle services and corporate chartered services to operate between central Stellenbosch and other main employment nodes. Park and ride sites along the Adam Tas Corridor will generate activity and so provide the base thresholds for some retail, commerce and other service developments which in turn support planned settlement growth at the nodes. Other park and rides will be sited along routes where development along the corridor must be prevented.*

**Park and Ride routes** Figure 50 of the MSDF, already reproduced in the SMEC study and in Appendix A below, shows that the MSDF has clear ideas about Park-and-Ride sites and feeder routes. Sites which are relevant to the present parking garage proposal include Droë Dyke/Oude Libertas and the Stellenbosch Central Railway station; see MSDF Table 35.

**Adam Tas Corridor** (MSDF Section 6.9.1) *Remote parking facilities will form part of the [Adam Tas] corridor concept, with passengers transferring via public transport, cycling and walking to reach destinations within the town of Stellenbosch.*

*Redevelopment [of the ATC] offers the opportunity to . . . accommodate the parking of vehicles on the edge of town.*

## C FSM Comments of 12 May 2023 (first page)



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### 2023 Draft CITP: FSM Comments, Questions and Criticism

12 May 2023

## 1 Background and motivation

- 1.1 **The law, budget constraints and climate change realities all prescribe investment into public transport and NMT infrastructure as priority over road-related infrastructure.** National and provincial legislation and strategy and even the Stellenbosch IDP and MSDF are all clear on this.<sup>1</sup>
- 1.2 Obviously, public transport is impossible without the underlying **public transport infrastructure**. The City of Cape Town and George Municipality have made significant strides in putting into place the necessary infrastructure and are now reaping the benefits. Stellenbosch, by contrast, is far behind on public transport infrastructure and must catch up urgently.
- 1.3 At present, **The Stellenbosch public transport infrastructure situation is catastrophic.** Stellenbosch has a well-developed road system but virtually no public transport infrastructure. The rail system is currently dysfunctional. Bus services exist only for schools and special needs. Taxi ranks constitute the only current public transport infrastructure even worth mentioning. While Non-Motorised Transport (NMT) is important for short trips, it plays little to no role for longer distances and the associated bigger infrastructure needs.
- 1.4 Public transport oriented mobility plans were put together by a task team over three years but canned by the municipality in 2000. Stellenbosch was also selected in 2007 as a priority for public transport, and the present draft CITP is the fourth one. However, public transport sections of previous CITPs were never taken seriously or implemented. Far from being innovative, Stellenbosch Municipality has remained in a cars-and-roads-only mindset. The emphasis remains on roads: road building, road maintenance and road planning. A Roads Master Plan (RMP) was compiled in great detail and its many projects continue to dominate planning and spending. Stellenbosch Municipality explicitly rejected efforts in the years 2016 to 2019 to make use of available grant funding such as the PSTP and has historically invested very little into public transport infrastructure.

<sup>1</sup>Examples: the *National Land Transport Act*, the associated *2016 Minimum Requirements*, the March 2023 *National Land Transport Strategic Framework*, Western Cape planning documents such as the *Provincial Spatial Development Framework*, the WC Government Medium Term Expenditure Framework Vote 8, etc all say the same thing: public transport must be prioritised.

## D FSM Comments of 4 October 2023 (first page)



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### FSM Comments and Recommendations: 2023/24 IDP, CITP, Budgets 4 October 2023

1. FSM submitted comprehensive and well-researched comments on Draft 2 of the proposed 2022-2027 Comprehensive Integrated Transport Plan (CITP) on 12 May 2023. As required, we sent our comments not to Stellenbosch Municipality (SM) but to the CITP consultant AECOM. We attach the complete version as a separate PDF file; it is also available on the FSM website at <https://fsmountain.org/dfsm/230512-fsm-citp-comments.pdf>
2. We now submit these comments and criticism also to SM within the current 2023/2024 IDP and budget process because they are highly relevant to present and future budgets and funding priorities.
3. We did a joint analysis of both municipal and provincial budgets on infrastructure projects related to moving people and goods. We classified 86 projects listed in the MRTEF plus 11 projects listed in Votes 8 and 10 of the Western Cape Government MTEF into one of four categories: *New Road/Car*, *Road Maintenance*, *Mobility and Transport* plus *Undetermined*. The time horizon for these is 3 years. We also analysed the projects listed in Annexure C of the CITP which have a time horizon of 10 years. See Appendix A below for details, which is the same as Appendix I of our 12 May 2023 comments.
4. We repeat our main conclusions here. Of the R1.173 billion jointly budgeted for the next three years by Western Cape Government MTEF and Stellenbosch Municipality MTREF for mobility infrastructure, 95% is allocated to roads and road-related projects. Only R43m (4%) is budgeted for true mobility and transport infrastructure spending:

Infrastructure Spending Type	3-year budgets	Percent
New roads and car-related	R355,329,950	30
Road maintenance	R761,617,000	65
Transport, NMT & Mobility	R43,050,000	4
Undetermined	R13,050,000	1
<b>Total</b>	<b>R1,173,046,950</b>	<b>100</b>

Of the R859m in mobility infrastructure projects budgeted for the next 10 years, Stellenbosch Municipality intends to spend 65% of its own money on new roads and a further 20% on road maintenance, i.e. 85% on roads. The 10% (R84m) to be spent on public transport is dominated by NMT (R31m) and the Khayamandi footbridge (R26m), leaving only R27m for proper transport projects in the next 10 years:

Infrastructure Spending Type	10-year horizon	Percent
New roads and car-related	R561,879,950	65
Road maintenance	R170,650,000	20
Transport, NMT & Mobility	R84,050,000	10
Undetermined	R42,550,000	5
<b>Total</b>	<b>R859,129,950</b>	<b>100</b>