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Date/Datum: 28 May 2014

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Attention: Elizabeth Dudley

PROPOSED IMPROVEMENTS TO THE R44 BETWEEN SOMERSET WEST AND STELLENBOSCH: (DEA&DP REF. NO.: 16/3/1/1/B4//45/1005/13): COMMENTS ON PROPOSED IMPROVEMENTS OF THE R44 BETWEEN SOMERSET WEST AND STELLENBOSCH

1. EXECUTIVE SUMMARY

The proposed improvements to the R44 between Somerset West and Stellenbosch, as per project proposal DEA&DP REF. NO.: 16/3/1/1/B4//45/1005/13 and the basis of this response, are not supported by the Stellenbosch Municipality. It is our considered view that the proposed circles are inappropriate for the area, not in line with integrated planning principles and not the best utilisation of resources for our area. The impact of the proposal will also, in our view, damage the unique cultural landscape and harm the well-developed tourism economy of the area. The long term function of the road on a regional and local context needs to be agreed upon before the proposed solutions can be evaluated. The economic viability and impact of public transport on the functionality of the R44 needs to be investigated as a potential long term solution.

It is hereby requested that this project be postponed until integrated transport planning has been done for the functional area and that solutions for the median crossing problem be evaluated with the long term vision as a basis. We make ourselves available for discussion in this regard and would recommend that the City of Cape Town be part of the discussion group.

2. INTRODUCTION

The Western Cape Government (WCG): Department of Transport and Public Works (DTPW) has initiated the planning of a project for the improvement of safety conditions on the R44 from Somerset West to Stellenbosch, by considering farm access median crossing interventions. As part of the consultative EIA (BAR) process, comments and inputs have been requested from interested and affected parties and role-players. The Municipality of Stellenbosch, as local municipality responsible for “municipal planning” in the WC024 area, as contemplated in Schedule 4B of the Constitution of South Africa, 1996 and primary role-player in the provincial context, provides input in this regard as set out below.

As stated in the BAR, the Western Cape Government (WCG): Department of Transport and Public Works (DTPW) is proposing safety and Level of Service (LOS) improvements along Main Road 27 (R44) between Somerset West and Stellenbosch. The project study area extends from Steynsrust Road (Km 20.15) in Somerset West to Van Rheeede Street (Km 33.00) in Stellenbosch.

In the *Background* to the Proposed Project, it is stated inter alia that:

- 2.1 The R44 is predominantly a high speed mobility corridor that forms a strategic link between Somerset West and Stellenbosch at a regional transport planning level.
- 2.2 The road is a dual carriageway that has a number of intersections where side roads join via un-signalised or signalised intersections. Private properties abutting the R44 have direct access onto the R44. There are also many median openings which provide access between the two carriageways of the R44.
- 2.3 Traffic volumes have increased significantly resulting in congestion along the R44, and increase in delays, queuing and a decrease in level of service. Road safety is a major concern to commuters as there are a significant number of accidents taking place on the route.
- 2.4 The numerous median openings and accesses, as well as right turns and the frequently observed U-turns across heavy opposing traffic volumes are posing an increasing risk. The access spacing of most of the driveways and corresponding median openings are deemed to be substandard in terms of the Provincial Road Access Guidelines.
- 2.5 Development pressure along the R44 and in the adjacent areas has resulted in many new developments being approved and developed over time. Traffic associated with these land uses contribute to an increase in traffic and dangers associated with the use of substandard accesses and median openings.
- 2.6 The approach to deal with safety problems was undertaken in a piecemeal way in the past whilst a holistic approach to the problem is required. The main intersections along the R44 where secondary roads including Winery, Eikendal, Annandale and Techno Park intersect with the R44, were dealt with in isolation and did not consider the overarching implications on the R44.

3. STATEMENT OF PRINCIPAL POSITION:

The Municipality of Stellenbosch, as its principal viewpoint, provides comment and input as follows:

- 3.1 There is no long-term integrated strategic plan available regarding the transport planning approach and transportation issues directly related to the broader area. Various plans, policies and documents refer to broader principles, including a focus on public transport and non-motorised transport, rural development criteria, etc., but there is no resultant implementation plan regarding this corridor.
- 3.2 This fact as stated above, is reflected in one of the basic assumptions of the study (see point 1 in the Background to the Proposed Project section above), where the premise is that “*The R44 is predominantly a high speed mobility corridor that forms a strategic link between Somerset West and Stellenbosch at a regional transport planning level*”. This premise is contested by the municipality and is discussed in more detail later.
- 3.3 The scale and context of the proposed intervention is considered to be inappropriate. It is the view that this opinion will be borne out in a long-term strategic planning intervention for the greater area. This will be discussed further in relation to the environmental and economical impacts.
- 3.4 Within this context, the proposals are deemed to result in the inefficient application of financial resources, due to the inappropriate scale but also due to the sub-optimal timing of the project and proposed expenditure.
- 3.5 Within the regional context, the proposed project is not considered as the highest priority, especially given the potential financial scale and the limited availability of funding, and the view is held that the resources can be applied more strategically in relation to transport needs for the area, with better long-term benefits.
- 3.6 The improvements will have a negative impact on the traffic in Stellenbosch. This impact needs to be investigated and solutions found.
- 3.7 The proposed interventions will have a negative impact on the environmental quality of the area and will harm the economy of the area that is heavily dependent on farming and tourism.
- 3.8 The Provincial Spatial Development Framework and the Municipality’s CITP advocate the need to improve public transport to make towns and cities more efficient and to reduce transport problems. The roll-out of public transport from Somerset West to Stellenbosch should be investigated and incorporated in this project.
- 3.9 The proposals are not in line with current Provincial and Municipal policy.
- 3.10 While extensive comment is provided below, the Municipality requests to discuss these inputs in depth with the relevant authorities and project teams, in relation to the wider impacts and need for strategic planning.

4. BACKGROUND

- 4.1 The current situation and proposed remedy as suggested by WCG is based on the resolution of safety issues relating to the proliferation of level crossings and farm access points on the R44, which is a 4 lane dual-carriageway construction.
- 4.2 The proposal for grade-separated roundabouts originated from the need to provide opportunities for road-users to cross one of the carriageways on the R44 to access the lanes in the opposite direction, due to the elimination of level-crossing accesses. The safety situation is also exacerbated by the potential for high prevailing speeds on the road.
- 4.3 There is a need for a *mobility* focused route in the area, to promote ease of commuting, efficient delivery of goods and addressing medium- to long-distance travel needs on the provincial network.
- 4.4 There is also a need for a local distributor route, focused on *access* to farms, tourism facilities and transport of a localised nature.
- 4.5 The situation on the R44 South is a direct symptom of the clash between the above-mentioned two core needs, which are being provided for (attempted to) on one shared roadway.
- 4.6 Any proposals to deal with the symptomatic situation should be done with due consideration of, and inputs from, the wider transport planning needs assessment.
- 4.7 Stellenbosch municipality is the local municipality responsible for planning and managing the WC024 municipal area in which the study area falls. A number of provincial roads dissect the municipal areas such as the R44, R304, R310, R101 and M12. Without exception all these Provincial Roads pass through Stellenbosch Town and culminates in a single road in the form of Adam Tas Road. All traffic to, from and through the town of Stellenbosch passes through this narrow corridor which is essentially a double carriageway with two lanes in both directions.
- 4.8 The Western Cape Government (WCG): Department of Transport and Public Works (DTPW) has progressed substantially in investigating and preparing Arterial Management Plans (AMPs) for each of the roads. The proposals for all of the roads follow the same pattern where the road is upgraded to the same standard as the R44
- 4.9 While the AMPs and upgrades of the arterials are planned, no consideration was given to the impact into and through the town, despite these routes being provincial roads. The management of these provincial routes impacts heavily on Stellenbosch and its transport operations, as well as on the overall environment.

5. MOTIVATION

The following motivation is provided in support of the statements made in the Principal Position. These arguments are not exhaustive and further input can be provided in the requested detail discussions.

5.1. Planning Principles

- 5.1.1 Should the R44 and other provincial roads be classified as regional roads with a much wider service area than WC024, it flows logically that mobility along the roads will be of paramount importance. However, in order to maintain good mobility along the routes, the planning and functioning of the towns through which these roads go will be impacted on severely as the roads in essence cut the towns in halves, thirds or quarters, leading to a dysfunctional, segregated and a structurally flawed urban form.

Seemingly therefore, despite the declared intention of the authors of the report to look at the planning of the road holistically, the piecemeal approach to the problem is inadvertently continued with by only investigating a portion of the road between Somerset-West and Stellenbosch. Ironically it therefore fails to look at the role and functioning of the road holistically.

- 5.1.2 In light of the above, it is argued that the planning of the road impacts on the competency of the local municipality responsible for “municipal planning” as contemplated in Schedule 4B of the Constitution of South Africa, 1996. This argument is based on the fact that the road planned by the DTPW has a direct impact on the planning, functioning and servicing of the local municipal area which cannot but align to the regional road.
- 5.1.3 The Provincial Spatial Development Framework (PSDF) was approved by Cabinet on 9 May 2014 and reflects the broad development pattern and development strategies of the Western Cape including the Winelands area. This policy document took into account the long term vision for transport in the Western Cape as explained in the Western Cape Provincial Land Transport Framework (PLTF) (2013).
- 5.1.4 The PLTF sets out a long term vision for transport in the Western Cape. The PLTF’s targets are inter alia that by 2050 the transport system in the Western Cape will have:
- i. Fully Integrated Rapid Public Transport Networks (IRPTN) in the higher order urban centres of the Province;
 - ii. Fully Integrated Public Transport Networks (IPTN) in the rural regions of the Province;
 - iii. A safe public transport system;
 - iv. A well maintained road network; and
 - v. A sustainable, efficient, high speed, long distance rail network (public and freight transport) with links to the Northern Cape, Gauteng and the Eastern Cape.

5.1.5 The PSDF further applies a number of important guiding principles relevant to this report, one of which is the principle of accessibility. This principle of accessibility is explained in the PSDF (paragraph 1.5.4 page 22) as follows:

Improving access to services, facilities, employment, training and recreation, and safe and efficient transport modes is essential to achieving the stated settlement transitions of the NDP and OneCape 2040. Accessibility is also defined by convenient and dignified access to private and public spaces for people with impaired mobility. Good and equitable access systems must prioritise the pedestrian, as well as provide routes for bicycles, prams, wheelchairs and public transport. An accessible system will offer a choice of routes supporting these modes and safe connections between places and communities. Visual access implies direct sight lines or unfolding views, signs or other visual cues, and being able to see other people - all of which help in negotiating places.

5.1.6 The PSDF also builds on ONCAPE 2014's vision of "a highly-skilled, innovation driven, resource efficient, connected, high opportunity and collaborative society". Relevant to this vision are the themes of:

- i. Working Cape: There are livelihood prospects available to urban and rural residents, and opportunities for them to find employment and develop enterprises in these markets.
- ii. Connecting Cape: Urban and rural communities are inclusive, integrated, connected and collaborate.
- iii. Living Cape: Living and working environments are healthy, safe, enabling and accessible, and all have access to the region's unique lifestyle offering.

5.1.7 More importantly, the spatial logic underpinning the PSDF (Table 8 page 34) calls for improving connectedness between rural and urban land uses with a view to broaden opportunities and widen access to the economy and other social infrastructure.

5.1.8 The PSDF is otherwise silent on the role and function of the R44. It does not identify the provincial roads within the WC024 as regional connectors/distributor roads. The focus was rather placed on a significant investment in public transport and NMT and not in roads.

5.1.9 It is a common understanding that a much greater focus be put on, not only the development of public transport and Non-Motorised Transport (NMT) in urban but also in rural areas. Due to a fairly large dependency on manual labour a large number of pedestrians make use of the verges of the provincial roads such as the R44.

5.1.10 In addition, cycling as a sport has grown tremendously over the last 10 years. The R44 is one of the main routes used by cyclist for recreation and exercise. A growing number of commuters are also reverting to cycling between Somerset-West and Stellenbosch. The effort by DTPW would be vastly more effective and affordable by investing in a proper NMT network that improves the safety of pedestrians and cyclists along the route.

It would also have the benefit that it will complement the cultural landscape, connect rural residents with the towns and improve tourism.

- 5.1.11 Farming along the R44 is almost exclusively dedicated to vineyards. During harvesting season a large number of slow moving farm vehicles use the road contributing to the conflict between slow moving local traffic and fast moving commuter traffic. By improving mobility and traffic flow to an even greater speed, conflict will increase unless separate service roads are developed on both sides of the R44. Although this alternative would address the problem, the visual impact of such additional roads together with the existing double carriageway, would be disastrous for the aesthetic appeal of the landscape and ultimately damage the economy of the region.
- 5.1.12 The PSDF accepted as a policy that, after the cities of Cape Town and George, that Paarl and Stellenbosch are targeted for the next phase for the role-out of urban public transport systems.
- 5.1.13 From an economic perspective the PSDFG recognizes the importance, significance and sensitivity of the cultural landscape of the Winelands and particularly this part of WC024. Due to the scenic beauty of the area the principle to protect scenic routes within this area was recognised. The R44 between Somerset-West and Stellenbosch and the Baden Powel Road were identified as primary scenic routes to be recognised and hence protected.
- 5.1.14 The Municipal Spatial Development Framework (MSDF) and the Draft Integrated Zoning Scheme Regulations highlights the Provincial Roads in the WC024 area, including the R44, as scenic routes that warrants special protection and particularly limits development of structures within a 100 meters area from the road reserve.
- 5.1.15 The contribution of the Winelands to tourism in the WC024 area and the Western Cape cannot be ignored. Much of the attractiveness of the Winelands stems from the scenic beauty of the area. The Cape Winelands is internationally recognised as an area of exceptional attractiveness and environmental importance as is evident with the officially declare UNESCO Winelands Biosphere Reserve. In addition, the Winelands was preliminary declared an UNESCO Cultural Landscape which application is proceeding with a hope to officially obtain a UNESCO declaration for the area. The construction of inappropriately scaled structures as proposed will not assist the application that is currently being prepared.
- 5.1.16 Despite the mitigating measures proposed by the report, the impact on the quality of the environment is still unacceptable and will have a detrimental effect on tourism and thus the economy. Any attempt to pursue the declaration of the Winelands as a cultural landscape in the event that the upgrading proceeds will be scuppered. This will have a severe dampening effect on the economy by eroding the competitive advantage of the area and in the long run, the economy.

5.2. Transport Principles

- 5.2.1 Should the section of the R44 between Somerset-West and Stellenbosch function as a strategic link at a regional transport planning level the proposed upgrading of the

intersections at key intersections along the R44 (Study area) will not have any effect on mobility on a regional scale unless the portion of the provincial roads within Stellenbosch Town is significantly upgraded. Congestion along the R44 will simply relocate to Stellenbosch town. Mobility along a transport corridor is determined by the LOS of all the intersections. By ignoring the section through Stellenbosch Town, the regional mobility of the routes is severely constrained.

- 5.2.2 The above observation brings into question the function of the R44 as a regional distributor vis-a-vis a municipal distributor that functions as a road that mainly services the WC024 municipal that includes the urban built up areas such as Stellenbosch, Koelenhof, Vlottenburg, Lynedoch, Jamestown etc. as well as rural properties and active farms.
- 5.2.3 Not only does the R44 form an integral part of the road network that services all the properties, farms and development adjacent to it, it is the only infrastructure available to do so. The view is held that the road was originally mistakenly designed at a much higher standard than required which resulted in conflicts amongst the different road users and pedestrians originating from the farms along the route. In light of the increase in vehicle traffic as well as the normal development of the rural area together with farming practises, the risk to road users have increased substantially. The response required to address the risk should however be appropriate for the functioning of the road as in context of its use.
- 5.2.4 The apparent view of DTPW that the R44 acts as a regional distributor can only be substantiated if alignment and planning of the provincial roads that function as regional distributor, which passes through the WC024 area, is evaluated holistically. In this regard such a route would essentially connect the N2 with the N1, possibly further to the north. The functioning of such a route would be restricted to a high speed mobility route connecting regional sub centres and not as a local distributor.

The CIP completed by the municipality in 2010 recognised that mobility along such a route is important and proposed a by-pass to the west of Stellenbosch connecting the N2 with the N1 and excluding the urban area of Stellenbosch town. Admittedly, the impact and planning of such a route is an expensive and long process but will assist in deciding the functioning and future LOS of roads such as the R44. This argument in the CIP strengthens the municipality's principal view as stated at the start of this document.

- 5.2.5 The view is held that the proposed grade separated roundabouts pre-empts the need to improve the mobility and the conflicts that are experienced on the R44, particularly at the important intersections. Should a regional road network that functions as a regional distributor and not as a local distributor be envisaged, the proposed improvements could be viewed as an unnecessary and an exceptionally costly intervention.
- 5.2.6 From other studies and proposals that DTPW is currently involved in, it is clear that the grade separated intervention proposed in this study is also proposed elsewhere on provincial roads within the WC024 area pointing to a general acceptance that the current local distribution network is planned as an exclusive regional distributor.

- 5.2.7 The original design of the R44 South, i.e. as 4-lane dual-carriageway, is considered to have been excessive, i.e. this contributed to the perception that this is a high speed road, similar to a freeway, with little local functionality. The BAR indeed refers to the road as a “predominantly a high speed mobility corridor”. This perception has been strengthened over the years and the current approaches focuses on solutions to promote or protect this overly accentuated mobility role.
- 5.2.8 This design “flaw” is a main contributing factor to the current situation, i.e. that the local traffic and the current road use are incompatible, leading to safety issues. This is considered as a core issue in this debate. The safety issue is a symptom of the core-issue.
- 5.2.9 As stated above, there is a direct clash due to the differing needs of mobility vs. access, with their different traffic flow-characteristics.
- 5.2.10 The aim of the proposed intervention, i.e. to eliminate this conflict as at the multiple level-crossing access points, is supported.
- 5.2.11 The proposed solutions, i.e. grade-separated roundabouts, in conjunction with the closing of median crossings, are aimed at addressing the symptoms as discussed above and are not viewed as addressing the core-problem. The focus of remedying the safety situation originating from the level-crossings does not address the need for a mobility-route which is not in conflict with an access-route. Provincial policy advocates the promotion of accessibility as opposed to a mobility-focus.
- 5.2.12 It is believed that the core solution to the problem is the establishment of a provincial/regional mobility-focused link to accommodate regional traffic.
- 5.2.13 This will reduce the functioning of the existing route to a local distributor with an access focus, which will operate at lower speeds.
- 5.2.14 These two routes can then operate independently and mutual access can be provided at controlled points.
- 5.2.15 This system is widely used nationally and internationally, and even in the immediate vicinity.
- 5.2.16 There is an urgent need to plan and provide the provincial road as referred to, which is not currently provided for on any budgets. Any work done now, to directly address the symptoms as discussed, will to a great extent be wasteful in the long run, and not contributing to the overall solution.

Irrespective and in addition to any inputs provided above, further inputs relating to the specific design elements as considered, are as follows:

- 5.2.17 The apparent scale of the proposals at the Annandale Road intersection of the R44 is considered inappropriate. It is also our contention that the illustration of the interventions is not entirely correct and does not give a true indication of reality.
- 5.2.18 While the merits of the proposals, when considered purely in terms of its ability to provide opportunity for turning movements to enable the objectives of the Access Management Plan is understood, the overall scope and extent of the proposals are considered to be entirely inappropriate.
- 5.2.19 Design elements do not only have to address technicalities and engineering related factors, but has to consider impacts in terms of the environment, economy, heritage, spatial factors, etc. Cost implications have to consider total life-cycle costs, which has to include economic impacts, etc.
- 5.2.20 It is contended that such life-cycle costing should include the long-term costing in terms of the overall transport solution (see previous points), the real threat of the negative impact on tourism and agriculture, the potential destruction in terms of the environment, the visual impact (natural beauty and sense-of-place), etc.
- 5.2.21 While this project focuses on the situation as described above, there is a need for wider consideration of the broader transport environment, which has a direct and negative impact on the traffic/transport situation in the functional area of Stellenbosch.
- 5.2.22 It is the considered view, which has been communicated before, that the provincial road network needs to be improved to include a regional/provincial link between the N1 en N2 to the eastern perimeter of the metropolitan impact area, i.e. in the vicinity of Stellenbosch, in response to the mobility needs.
- 5.2.23 Any interventions planned should be assessed in relation to the Provincial Integrated Transport Plan, Provincial Transport Policy and local Comprehensive Integrated Transport Plan and Spatial Planning Frameworks.
- 5.2.24 While private road-based transport and freight transport will always be required, the provincial goals of improved public transport for example, will have the effect of reducing this need. While the assessment states that these policies and documents have been considered, these elements are seemingly not being considered adequately in this proposal, and no discussion is provided into the broader context.
- 5.2.25 The Municipality of Stellenbosch is of the view that the comments on the current project proposals can only be considered in relation to this broader transport and planning context within the area and therefore the discussions and inputs that follow is provided in this context.

6. ALTERNATIVES

- 6.1 The view is held that not sufficient attention has been paid in discussing potential and appropriate alternatives.

- 6.2 Only localised alternatives seem to have been considered, e.g. a normal at-grade roundabout and signalised intersections. Broader alternatives were not considered adequately. Reference is made in the Executive Summary to alternatives considered and rejected, but there is no discussion of the reasons for the rejection. The view is held that these alternatives must be more fully considered, and that the cost-benefit analysis should be done with due consideration of long term life-cycle costs and impacts.
- 6.3 While it is not the role of this municipality or any external role-players to provide solutions, it is felt that other alternatives could have been considered. These include mechanisms to reduce the volume and speed of existing traffic (public transport options, localised rail provision), completion of the provincial mobility network to refocus the current roadway to an access function, service roads, etc.
- 6.4 Even if a purely engineering driven solution is to be found, there is no requirement for a turning facility to have to be within an existing intersection. Roundabouts could be considered at less sensitive loose-standing positions. Even semi-circular turning facilities (i.e. one direction only at a time) could have been considered with a much smaller footprint and in geographically beneficial positions. These ideas are not put forward as solutions; it is only to show that other concepts are available for consideration.
- 6.5 In the view of this municipality, the preferred solution lies in the establishment of an appropriate network addressing the mobility need as well as the access need, preferably separately. The best way to make use of the existing dual carriageway infrastructure should be considered in unison with a planned extended provincial mobility network and by providing parallel access-based infrastructure. This must be done with due consideration to environmental, spatial and heritage parameters.
- 6.6 Given the potential scale and cost of proposals, and given that there is a serious and identified need for a broader approach, alternatives should be an investment into the best long-term solution.

7. CONCLUSIONS

- 7.1 The current high traffic volume along the R44 is not disputed. Nor is the risk imposed by conflict between local traffic, commuter traffic, pedestrians and cyclists.
- 7.2 What is disputed however is the view that the R44 (and other provincial roads such as the R304) forms the backbone of a regional transport network necessitating the investment on drastic interventions such as are proposed in the report. It is this authority's view that such a decision cannot be made as it will be interpreted as a piecemeal approach to transport planning unless a comprehensive study is undertaken to distinguish between local roads serving the rural community and regional roads aiming at providing a high level of mobility. Such a study was not undertaken yet and would be well worth the while to consider.
- 7.3 It is also argued that the proposed grade separated roundabouts is an inappropriate intervention that will have a detrimental impact on the scenic quality of the area and cultural landscape ultimately hurting the local economy significantly.

- 7.4 This municipality also holds the view that a significant investment in public transport and NMT is not only a more sustainable alternative but is official policy of the Provincial Administration.
- 7.5 Stellenbosch Municipality, in its capacity as Planning Authority, partner in managing the road networks, major provincial destination and tourism capital, objects to the proposals on the grounds of the inappropriate scale of the proposals and the potential negative impacts on wide range of functions.
- 7.6 The view is held that a comprehensive solution regarding transport issues, within the terms of reference of the Provincial and Local IDPs and sector plans, and in terms of exemplary co-operative governance, should be found.
- 7.7 To this end, it is requested that an opportunity be created for direct discussion on the highest level, in this regard.

We are confident that you will entertain our arguments in order to facilitate an integrated solution that will best suit the Stellenbosch community for the next 50 years.

Yours faithfully



Martin Smuts, Executive Deputy Mayor
Written as Chair of the Transport Working Group

Copies to:

1. Minister of Provincial Transport
2. Minister of Provincial Tourism
3. Minister of Provincial Finance
4. Minister of Provincial Agriculture
5. Head of Department - Ms Jacqui Gooch
6. Transport for Cape Town - Ms Melissa Whitehead