



Our Ref/Ons Verw: 16/3/4/2
Your Ref/U Verw:

Date/Datum: 12 April 2016

CCA ENVIRONMENTAL (Pty) Ltd • Consulting Services
Unit 35 Roeland Square
30 Drury Lane
Cape Town
8001

Attention: Jonathan Crowther
ena@ccaenvironmental.co.za

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

Your letter dated 26 February 2016 refers.

1. EXECUTIVE SUMMARY

The Stellenbosch Municipality considered your revised Basic Assessment Report. It is our view that the content of our letter dated 28 May 2014 is still appropriate. The proposed improvement scheme is not supported by the Municipality. It is our considered view that the proposed upgrades are inappropriate for the area, not in line with integrated planning principles and do not consider the priority transport problem in 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 project can be considered.

It is again 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.

2. STATEMENT OF PRINCIPAL POSITION:

The Municipality of Stellenbosch in its letter dated 28 May 2014 stated the following viewpoint and would like to reiterate that view:

- 2.1 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.
- 2.2 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.
- 2.3 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.
- 2.4 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 phasing of the project and proposed expenditure.
- 2.5 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 significantly higher long-term benefits.
- 2.6 The improvements will have a negative impact on the already congested traffic flows in Stellenbosch. Only by conducting an integrated investigation on a broad basis can potential solutions to the area wide issues be identified and evaluated on their merits.
- 2.7 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.
- 2.8 The Provincial Spatial Development Framework and the Municipality's CIP 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.
- 2.9 The proposals are in direct contravention of current Provincial and Municipal policy.

You are requested to consider these principles in relation to the motivation that was provided in our 28 May 2014 letter.

3. CONCLUSIONS

- 3.1. Regional priorities must be considered as part of the overall approach with an emphasis on the consideration of the current traffic situation within Stellenbosch and its surrounds. This should be done as part of the shift towards sustainable transport as is required in terms of National, Provincial and Municipal policies, strategies and frameworks. This will require Public and Non-motorised Transport forming an integral part of any project planning and implementation process.
- 3.2. Any upgrade to this section of the R44 should thus be incorporated in the development of an integrated approach to transport planning including a comprehensive public transport service serving the broader Stellenbosch area and surrounds.
- 3.3. Full consideration should also be given to appropriate Non-motorised Transport facilities. This must recognise the multifaceted nature of NMT in the area, especially regarding cycling with its many profiles – commuter, recreational (including tourism) and sports which may require differing facilities.
- 3.4. Given the above, the Basic Assessment is inadequate for a project such as this which has major regional implications not only from a sustainable and safe transport perspective but also socioeconomic and environmental perspectives.
- 3.5. This scheme as currently envisaged is not supported.

4. RECOMMENDATIONS

- 4.1. The overall strategy to these upgrades should be reconsidered in conformance with policy and legislation as part of an integrated planning approach for Stellenbosch Municipality and its surrounds.
- 4.2. Consideration be given to immediate interim measures focussed on improving safety along the route. This should include high visibility, continuous and active enforcement. In this regard the proposal for “Speed over Distance” enforcement should be implemented with immediate effect.
- 4.3. The overall strategy must include an alternative second access to Jamestown and make provision for public transport pick up points to create linkage between rural and urban communities and opportunities.

We look forward to being able to contribute in any way to ensuring that the appropriate studies are conducted and concepts and designs are considered.

Please liaise with our Acting Director: Engineering Services, Mr Marius Wust, should you require more detail or to set up an engagement.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R Bosman', with a stylized, cursive script.

RICHARD BOSMAN
ACTING MUNICIPAL MANAGER

Copy to:

1. Minister of Transport
2. Head of Department - Ms Jacqui Gooch
3. The Commissioner, Transport for Cape Town - Ms Melissa Whitehead