



30 January 2017

Our Ref: 16/3/4/2

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Dear Madam

**PROPOSED IMPROVEMENTS TO THE R44 BETWEEN SOMERSET WEST AND STELLENBOSCH: (DEA&DP REF. NO.: 16/3/1/1/B4//45/1005/13): NOTIFICATION OF AVAILABILITY OF FINAL BASIC ASSESSMENT REPORT FOR REVIEW AND COMMENT**

This is the response from the Stellenbosch Municipality to the notice of the availability of the final basic assessment report (BAR) dated 12 December 2016, focusing mainly on the following:

- the purpose of the proposed project;
- assessment of related and downstream impacts; and
- need for joint planning and design between the relevant authorities/spheres of government.

The municipality addressed a letter to the Department of Transport and Public Works on 15 November 2016, a copy of which is attached hereto as further background to this letter of comment on the final BAR.

The basic assessment report indicates that the project rationale is to improve the mobility function of the R44 between Somerset West and Stellenbosch. The Municipality is of the view that this is a very short section of the R44 and that an improvement on mobility on this section of roughly 12 km is immaterial. In addition thereto, the BAR does not give appropriate consideration to the nature of activities developed along this section of the road with approval of the roads authorities over years, if not decades. The need for mobility (through Stellenbosch town) necessitates the development of the Stellenbosch Western Bypass, as approved in the Stellenbosch roads Master Plan 2012 to 2017, with the approval of the relevant roads authority. The Western Bypass would have significant effect on the Annandale intersection and the remainder of the study area, being the section of the route between Annandale and Van Rheeде. This matter is noted in paragraph 3.4 on page viii of the BAR, but it is then not addressed in detail in the BAR.

The Western Bypass is of such importance that it should feature in the BAR, or then at least in a larger study, i.e. the BAR might not be the appropriate study to address the real issue, namely mobility between Somerset West / the N2 and Klapmuts / the N1. The basic assessment report only assesses one sector of roughly 12 km of the mobility route between two major urban areas causing obstructions in the longer route. This seems to be a

contradiction in terms, as mobility is not being improved through these areas of obstruction, but only between them.

The BAR refers to, but is silent on the extent and cost of the stated significant lowering of the level of service on roads and intersections inside of Stellenbosch town. Moreover, none of these impacts are addressed in the proposed mitigation measures (paragraph 8 from page xxviii and further), which leads to the assumption that none of the cost/impacts which are mentioned and acknowledged were assessed. Instead, the basic assessment report narrowly focuses on the construction, visual, biophysical and related impacts and not on the cost, safety and traffic level of service impacts in Stellenbosch as a result of the proposed upgrading of the section between Somerset West and Stellenbosch. At least that part of the BAR that deals with the relevant section of the route, namely from Annandale to Van Rheeде that overlaps with the proposed and acknowledged Western Bypass, should have included last mentioned as an alternative and assessed the relevant impacts, costs and benefits and made appropriate recommendations in the mitigation chapter.

In conclusion, the Municipality is of the opinion that the basic assessment report is inappropriate for the evaluation of the proposed upgrading and that a full environmental impact assessment considering all the related and downstream impacts should be undertaken.

The relevant authorities should jointly plan the mobility route to ensure maximum benefit is derived along the entire route from the N2 to the N1, failing which it should remain an activity corridor as it has developed over time with authority approval.

Yours faithfully



Dupré Lombaard

**DIRECTOR: PLANNING AND ECONOMIC DEVELOPMENT**