

Appendix “A”

Comment on the draft Stellenbosch Municipality Roads Master Plan (RMP), the Non-motorised Transport Master Plan (NMTMP) and the Comprehensive Integrated Transport Plan (CITP) by a technical working group of the Stellenbosch Ratepayers Association (SRA)

14 June 2021

Summary

The Roads Master Plan (RMP), the Non-motorised Transit Master Plan (NMTMP) and the Public Transport Plan (PTP) complement the Comprehensive Integrated Transport Plan (CITP). The CITP aligns with the Integrated Development Plan (IDP) and the Municipal Spatial Development Framework (MSDF). These plans must also align with Provincial and National policies and strategies and should not ignore relevant connections to plans of neighbouring municipalities.

Comment on the RMP and the NMTMP makes sense only when the analysis also considers the overall CITP. On 28 April 2021, the Council approved that the August 2019 RMP and the December 2020 NMTMP be released for public comment and accepted the June 2020 CITP.

The 2021 CITP should have been included for comment with the RMP and the NMTMP. The Council, however, accepted it as an update of the 2016 CITP, which it is not. The 2021 CITP barely mentions the 2016 CITP and does not mention an internal 2018 update at all. This represents a break with the approach and principles of the 2016 CITP. The 2016 CITP emphasised transit-oriented development (TOD) and the potential future use of rail infrastructure and other plans for public transport. The draft 2021 CITP focus overwhelmingly on roads and cars.

Comment on the RMP is thus complicated, as the 2021 CITP breaks with the principles and approach of the 2016 CITP.

Thus, within the context of the relevant associated plans, the 2021 RMP is problematic in terms of:

- Procedure and good governance
- Underlying principles
- Non-alignment with relevant other plans and policies
- Content.

These issues are discussed in more detail in paragraphs 1 to 4 below.

The SRA also recommends that the Municipality should not accept the Roads Master Plan. The Municipality should also rather release the new, flawed 2021 Comprehensive Integrated Transport Plan for public comment.

1. Procedure and governance

Good governance requires that the public should be able to comment on the 2021 CITP as it is a comprehensive new plan that constitutes a break with the TOD approach of the 2016 CITP. It also creates the framework for consideration and execution of the RMP. Finally, the financial figures in the budget do not make sense.

2. Underlying principles

The underlying principles of the 2021 CITP, which serves as a guideline for the RMP, are not clear.

The 2021 CITP declares the vision and objectives to be as follows:

- Connect outlying communities with the CBD in a safe and dignified manner, ensuring access to opportunities.
- Strive towards car-free living and a modal shift in Stellenbosch CBD towards public transport, walkability and cycle-ability.
- Support and advance social and inclusive economic development.
- Align with the critical imperatives of poverty alleviation and reduced inequality.
- Create a road network to support the Municipality's transport vision.

Except for the last objective, the CITP does not develop the cursory mention of its goals into an explicit vision that guides and underpins the plans that follow.

The implicit vision is that of a maximised road network. The contents of the CITP and RMP emphasise road-related issues and projects a private car driven future, both in connectivity to and from the main urban centres in the Municipality and within Stellenbosch. The documents record a predominance of road infrastructure, parking and related agendas. About 90% of the budget is for planning these facilities; the rest seems to be for planning and construction of NMT and public transport.

In other words, the plans appear to be based on a projection of an exacerbated current state into the future. There is not a future ideal that provides a basis for paradigm-shifting. There are no meaningful results of evidence-based planning. The plan stands in opposition to the 2016 CITP and TOD approach and the underlying principles of the National Land Transport Act.

3. Non-alignment with relevant plans

The alignment and integration with the MSDF and IDP are not explicit within the proposed 2021 CITP or the RMP. It seems impossible that the CITP and projected RMP could claim the same or even remotely similar principles as the MSDF, which is explicitly guided by principles for inclusive democracy, balanced, livable neighbourhoods, public transport, innovation and economic growth.

The MSDF and IDP emphasise innovation and are oriented towards the future. The proposed 2021 CITP projects an exacerbated current state of traffic into the future. The CITP and the RMP appear as reactive tactical plans rather than strategic plans.

The Municipality must consider and clarify this apparent discrepancy between different municipal policies and plans and between the CITP and RMP and the National Land Transport Act. The CITP and RMP should also clarify the potential future links to the transport plans of the provincial government and neighbouring municipalities.

4. Content

Stellenbosch Municipality did commendable work with the recent upgrade of taxi ranks and with the NMTMP. In this, and many others respects, the SRA will continue to support the Municipality.

Nevertheless, plans for new roads and cars represent perhaps 90% of the projected mobility expenditure, with little left for public transit, non-motorised transit, plans for better use of existing rail infrastructure, professionalisation of taxi's or any of several potential electronic or other innovations.

The plans are not balanced.

The SRA also notes the following aspects:

Lack of clarity regarding prioritisation and time frames: The RMP appears to be weak on prioritisation and time framing. From the plans, it seems, implicitly, that a Western Bypass

is set up as an alternative to a link between the R44 and the Adam Tas Corridor. Though present evidence does not support it, there could be a need to build a bypass at some future point. Meanwhile, a link between the R44 and the Adam Tas Corridor and a focus on TOD would be cheaper and result in rapid and inclusive economic growth. All decision-makers and not only the Municipality, require clear time frames and a proper understanding of interim measures to deal with the projected increase in pressure over the mid-term horizon instead of the longer-term, twenty years plus horizon. In this regard, putting the linking of the R44 to the Corridor as an implicit alternative to the Western Bypass may be misleading. The link could be an interim and more affordable step with less environmental and a more sustainable and immediate economic impact.

The future role of public transport is inadequately explored: Public Transport as a significant part of the future urban mobility system appears to be lost in the thinking about the future. The current private car-based reality projection seems to provide the basis on which the end is modelled. The place and role of e-hailing, improved para-transit sector supply and much more are not explored as part of the future mobility system. Parking for private cars appears to be higher on the agenda than staging facilitates e-hailing services, and downtown private car parking seems more critical than peripheral park-and-ride facilities that link to scheduled public transport services. For additional funding from other government tiers, the plan would have to present apparent alternatives that cannot be the usual. Spending more than 90% of the transport budget on strategies that proceed from unexamined assumptions and perpetuate a cycle that appears to be unsustainable, seems like potential wasteful expenditure.

The resourcing model is not transparent: Very few, if any, municipalities have adequate resources to address the type of infrastructure required to implement the recommendations outlined in the RMP. This, coupled with an unclear prioritisation framework, puts decision-makers who provide additional funding in a difficult position to consider the "alternatives" they are presented with in terms of this plan. At the very least, the budget should be correct, and it should also be projected graphically and be understandable. At present it is excessively complicated, with a great deal of administrative detail.

The cost of road infrastructure vs the expense of other infrastructure: The recommended RMP and related costs need to be considered in the context of other priority infrastructure spending. The plan and municipal officials recently promoting the program seem to argue that 'if you build it, they will use it'. This appears to be a passive and risky road to success. In this, the local consultants who compiled the plan seem to be at odds with the more careful and responsible evidence-based arguments of their company colleagues in the UK (see the technical report that follows). One should also note the bi-partisan support in the 2021-2022 US budget before Congress for a budget item of \$20 billion to demolish highly used highways which have destructive effects on communities, the environment, and local economies. This unexamined equation of roads with economic growth has been progressively interrogated for at least the past five decades.

And even if the SRA accepts the broad assumption behind the recommendations in the RMP, such plans will still need to be considered in relation to other infrastructure commitments in the same time frames.

To Conclude

Stellenbosch claims to be innovative, and it does attract talent and creative energy. The RMP and CITP plans for more and bigger roads for privately owned vehicles will, however, keep moving people further and further from work opportunities and are not aligned with the IDP and MSDF. Stellenbosch should and needs to do the right things, right.