

Proposed Wildebosch Road Extension to Trumali Street

Need and Desirability Report

(Appendix K of Draft BA Report)

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Stellenbosch Local Municipality

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1 Need and Desirability

The 'need and desirability' of the project should be evaluated against the strategic context of the development proposal along with the broader societal needs and public interest. According to the Department of Environmental Affairs Guideline on Need and Desirability (DEA, 2017¹), the concept of 'need and desirability' relates to the "*nature, scale and location of development being proposed, as well as the wise use of land.*" The concept of 'need and desirability' can be explained in terms of the broader meaning of its two components, need primarily referring to time, and desirability to place. It is acknowledged that 'need and desirability' are interrelated and the two components collectively should be considered in an integrated and holistic manner.

According to the DEA Guideline (DEA, 2017), the strategic context for the need and desirability of an activity can be reviewed in light of what is envisioned for a specific area, specifically what has been proposed in a municipal Integrated Development Plan (IDP) and Spatial Development Framework (SDF). These planning tools provide direction as to the desired spatial form of a municipality. Similarly, municipal Environmental Management Frameworks (EMFs) also provide the desired spatial form in terms of the environmental context of an area. Furthermore, the DEA Guideline (DEA, 2017) states that the need and desirability of an activity should be evaluated against the principles of "*promoting justifiable economic and social development*" as well as the principles of "*securing ecological sustainable development and use of natural resources*" as set out in the bill of rights in the Constitution.

Table 1 and **Table 2** below aims to provide more detailed responses regarding the project specific responses to the questions raised in the Need and Desirability guidelines of DEA (2017) and the Western Cape Government: Department of Environmental Affairs and Development Planning (2013). The responses were compiled taking into consideration the Provincial Spatial planning framework, Municipal IDPs, SDFs strategy, Biodiversity plans and the outcome of the project screening phase during which No-Go areas were identified based on environmental and socio-economic considerations.

Table 1: Need (Timing) of the proposed project (based on the 2017 DEA and 2013 DEA&DP guidelines): Promoting justifiable economic and social development

Question	Response
1. Is the land use (associated with the activity being applied for) considered within the timeframe intended by the existing approved SDF agreed to by the relevant environmental authority i.e. is the proposed development in line with the projects and programmes identified as priorities within the Integrated Development Plan (IDP)?	<p>As part of the 5th Generation Integrated Development Plan (IDP) 2022 – 2027, Stellenbosch Municipality intends to focus on critical road infrastructure upgrades from a safety and development perspective. Considering the lagging economic growth in the country, spending on economic infrastructure, specifically towards transport and public works is vital for stimulating economic activity. The road infrastructure plays an important role in unlocking the regions economic potential. Apart from the district municipality expenditure, Stellenbosch Local Municipality would assist with their own contribution of 61.5 million (accounting for 13% of total municipally infrastructure spending) towards road transport. Moreover, the municipality continues to roll out its infrastructure enhancement initiatives such as the Main Road Intersection Improvement Programme, the Traffic Signal Optimisation Programme and implementation of Public Transport Facility Upgrades.</p> <p>According to the Comprehensive Integrated Transport Plan (CITP) the municipality wishes to maintain and further develop road infrastructure to improve travel by all road users.</p>
2. Should development, or if applicable, expansion of the town/ area concerned in terms of this land use (associated with the activity being applied for) occur at this point in time?	<p>As part of the Provincial Sustainable Transport Programme (PSTP) the Western Cape Department of Public Works, Roads and Transport identified Stellenbosch as a priority municipality for the development of a sustainable transport system. The emphasis will be on the development of a public transport</p>

¹ DEA. 2017. Guideline on Need and Desirability, Integrated Environmental Management Guideline Series 9, Department of Environmental Affairs (DEA) (now the Department of Forestry, Fisheries and the Environment), Pretoria, South Africa.

Question	Response
	<p>system and the development of infrastructure to improve non-motorised transport.</p> <p>Based on the Provincial Spatial Development Framework the project aligns with the Provincial Land Transport Framework (PLTF) 2014, which sets out the transport policy agenda at the provincial level and the policy agenda for local integrated transport planning. This policy document emphasises the improvement of road investment and related decision support. Importantly, the policy seeks to coordinate and integrate transport planning at the provincial level. In line with spatial transformation planning outcomes, the focus of the municipality would be to establish special demand for social infrastructure and strategic infrastructure such as energy and roads.</p> <p>In terms of the Stellenbosch Spatial Development Plan (2020), 2.5% of the roads in the region are in poor or very poor condition. The current road network, particularly provincial roads fail to cope with the long-term growth needs and some roads especially in the historic town area, may in future operate at capacity during peak periods (unless modal shift changes). The transport planning focus and expenditure remain focused on roads and accommodating private vehicle transport. In addition, government fund allocation to Stellenbosch Municipality in the 2017//2018 financial year was largely focused on road infrastructure maintenance, rehabilitation, expansion and upgrades (R90 million).</p>
3. Does the community/ area need the activity and the associated land use concerned (is it a societal priority)?	Yes. In terms of the 5 th Generation Integrated Development Plan (IDP) 2022 – 2027, Stellenbosch Municipality wishes to focus on critical road infrastructure upgrades from a safety and development perspective. Considering the lagging economic growth in the country, spending on economic infrastructure, specifically towards transport and public works is vital for stimulating economic activity.
4. Are there necessary services with appropriate capacity currently available (at the time of application), or must additional capacity be created to cater for the development?	Yes. All necessary services are available with appropriate capacity. However, the municipality is in a position to plan for future capacity, instead of reacting to over-capacitated road network conditions in this instance.
5. Is this development provided for in the infrastructure planning of the municipality, and if not, what will the implication be on the infrastructure planning of the municipality (priority and placement of services)?	Yes. As indicated in the above sections.
6. Is this project part of a national programme to address an issue of national concern or importance?	No. It is a local upgrade.
7. Do location factors favour this land use (associated with the activity applied for) at this place?	<p>To some extent local factors do not favour this land use – A portion of the road extension over Farm 369 has high agricultural potential. This section may not be favourable for the project. However, the road construction will be localised and limited to the road footprint only.</p> <p>Upgrading Trumali Street is favourable for this existing road as well as road users.</p>
8. Considering the socio-economic context, what will the socio-economic impacts be of	The proposed road extension and upgrades would benefit road users and provide:

Question	Response
the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area? Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programmes?	<ul style="list-style-type: none"> • Safer travel; • Improved road conditions; • Reduced traffic volumes in existing built-up neighbourhoods; • Reduced travel times with improved transport efficiency; • Alternative road alignment • More consistent and reliable travel patterns; and • Improved amenity for local communities, since there is planned residential development in the area.
9. What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle?	Specific mitigation measures pertaining environmental health and safety are identified for inclusion into the Environmental Management Programme (EMPr). Regulations as per the Occupational Health and Safety Act (Act No. 85 of 1993) should apply during the construction phase of the project.
10. What measures were taken to ensure the participation of all interested and affected parties? What measures were taken to ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition were given to all forms of knowledge, including traditional and ordinary knowledge?	The Public Participation Process (PPP) is undertaken in terms of the 2014 NEMA EIA Regulations, and includes activities such as I&AP identification, newspaper adverts, written notification and placement of site notices as per the approved PP Plan.
11. Does the proposed use of natural resources constitute the best use thereof? Is the use justifiable when considering intra- and intergenerational equity, and are there more important priorities for which the resources should be used (i.e. what are the opportunity costs of using these resources for the proposed development alternative?)	<p>Environmental opportunities and constraints were identified at the start of the assessment process which will facilitate and inform the detailed design. Mitigation measures to manage impacts on sensitive environmental aspects have been included in the report to ensure that impacts on the environment are kept to acceptable levels. An EMPr has been compiled which incorporates the mitigation measures put forward in the Draft BAR. The implementation of the EMPr will ensure that environmental management continues throughout the life cycle of the project. The appropriateness of the development in the broader context has received attention.</p> <p>All the above aspects contribute to the sustainability of the development.</p>
12. What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)?	The beneficiaries of the proposed road are all people who would use the road alignment in the suburb of Paradykloof and surrounding areas.
13. Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?	The EMPr describes all reasonable and feasible mitigation measures and addresses long-term environmental management actions that are guided by the findings and recommendations of the specialists during the Basic Assessment process. The EMPr addresses the potential

Question	Response
	environmental impacts and mitigation measures of the proposed activity on the environment throughout the project life-cycle.
14. How was a risk-averse and cautions approach applied in terms of socio-economic impacts?	Potential socio-economic related risks will be mitigated through a proactive public participation process. Public Participation Process is undertaken in terms of the 2014 NEMA EIA Regulations and will culminate in a Public Participation Report.

Table 2: Desirability (placing) of the proposed project (based on the 2017 DEA Guideline and 2013 DEA&DP Guideline): Securing ecological sustainable development and use of natural resources

Question	Response
1. Is the development the best practicable environmental option for this land/ site?	Yes, the development is the best practicable environmental option. Although crossing a wetland and impacting a section of an agricultural area could not be avoided.
2. How will this development use and/or impact on non-renewable and renewable natural resources and the ecosystem of which they are part?	The anticipated use of both natural renewable and non-renewable resources is not significant given the nature of the development.
3. Would the approval of this application compromise the integrity of the existing approved Municipal IDP and SDF as agreed to by the relevant authorities?	The approval of this application will not compromise the integrity of the existing approved Municipal IDP and SDF as it aligned to the strategies proposed in these documents.
4. Would the approval of this application compromise the integrity of the existing environmental management priorities for the area (e.g. as defined in Environmental Management Frameworks (EMFs)), and if so, can it be justified in terms of sustainability considerations?	Biodiversity mapping sets out the land use objectives spatially in the form of Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs).
5. How will the activity or the land use associated with the activity applied for, impact on sensitive natural and cultural areas (built and rural/ natural environment)?	<p>Based on the Freshwater Aquatic Assessment undertaken on December 2023 by FEN Consulting, an unchanneled valley bottom wetland (UCVBW) was identified on site and delineated. The proposed road extension will traverse this delineated UCVBW. Mitigation measures recommended by the freshwater aquatic specialist must be adhered to. All mitigation measures will be included in the EMPr.</p> <p>Based on the Wetland Rehabilitation and Management Plan (WRMP), the proposed Wildebosch Road extension (including installation of a single precast box culvert) will result in a 0,22ha wetland loss which must be compensated for by rehabilitating a 50 m area of the wetland.</p> <p>Considering the extent of alien vegetation invasion within the Unchanneled Valley Bottom Wetland's (UCVBW) catchment, rehabilitating the entire UCVB wetland to improve wetland condition and associated ecosystem provision is not feasible in the long term, considering the anticipated resurgence of alien invasive vegetation species, most notably P. alba. Rehabilitating the entire UCVB wetland is also beyond the scope of works for the proponent.</p>

Question	Response
	<p>Furthermore, the proposed road extension only warrants that a comparatively smaller, localised area be rehabilitated. This will, however, benefit and improve the UCVB wetland condition within the crossing locality.</p> <p>According to the Agricultural Site Sensitivity Verification, a large portion of the road extension between Paradykloof (where the extension commences) and Trumali Strees is high potential vineyard land. However, the road construction will be localised and limited to the road footprint only.</p> <p>In terms the flora assessment, large sections of the site have undergone significant transformation and disturbance, preserving little to no original vegetation.</p>
6. How will the development impact on people's health and wellbeing (e.g. in terms of noise, odours, visual character and sense of place, etc.)?	There are no foreseen impacts on people's health and well-being given the nature of the development.
7. What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)	Assumptions, Limitations and Gaps in Knowledge for the proposed project have been elaborated on in section J of the Draft Basic Assessment Report.
8. How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage?	<p>There are currently no significant cultural and heritage resources located on the site. No archaeological or palaeontological material has been found on the site.</p> <p>Heritage Western Cape concluded that there is no reason to believe that the proposed extension of Wildebosch Road from Paradykloof Road to Trumali Road, as well as upgrading Trumali Road on Remainder of Erf 16527 and Remainder of Farm 369, Trumali and Paradykloof Road, Stellenbosch, will impact on heritage resources. No further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required.</p>

