

**NOTICE OF APPLICATION FOR AN ENVIRONMENTAL AUTHORISATION AND WATER USE LICENCE FOR THE PROPOSED WILDEBOSCH ROAD EXTENSION TO TRUMALI STREET IN STELLENBOSCH, WESTERN CAPE. DEA&DP REF: 16/3/3/6/7/1/B4/45/1342/23 / DWS REF: WU34262**

Dear Sir/ Madam

**On behalf of the Brandwacht Action Group, BRAG, I wish to supplement the previously submitted objection to this application on the following grounds:**

- An absence of any clear purpose and agreed need statement for the road extension.
- Lack of evidence of positive case for investment for this specific development
- There are fundamental flaws in the BAR and the due and correct process has not been followed in the compilation of the Traffic Impact Report and the BAR. (My comments are limited to these reports as I have not had the time or opportunity to review other specialist studies).

In summary, this objection centres on the following facts.

**There is no benefit of the specific road extension, the subject of this application.**

Meanwhile there are very high financial, environmental, ecological and place related costs. None of these have been adequately investigated. The road cost estimate is currently above R30m of public funding (prior to land purchase etc), without any significant transport benefit. The scheme would therefore result in fruitless and wasteful expenditure.

The road section under application is clearly communicated in the documentation as forming one component of future, linked and more expansive scheme and development applications. The reports are littered with **attempts to apply claimed merits & assumed benefits of further (highly contentious and irregular) developments that are not part of this specific scheme.**

Clearly this constitutes procedure **flaws, inaccuracy and deliberate misconstruing** of the material presented undermining the basis of this application and needs to result in its **immediate withdrawal.**

Further, what is contained in the BAR potentially amounts to **malpractice** and the **professional integrity and ethics** of the appointed BAR and the responsible municipal official(s) needs to be investigated. The pursual of this application constitutes **fruitless and wasteful expenditure** and the repayment of public sums spent on this application to this point need to be recovered from the proponents and their consultants.

I have included several **extracts** from the documentation in the sections below and highlight issues in my comments. See **Extracts 1 to 8** with comments below on the following pages

**My fundamental objection is to the stated aim and purpose of the road.** This road section addition will not improve traffic flow. Paradyskloof Rd and Schuilplaats Road linking to Trumali Road connections are adequate and uncongested. This new road link provides no relief on the R44. As an isolated road scheme, it is completely baseless. As part of a bigger scheme, it is potentially even more destructive for the sustainable development of Stellenbosch.

There is absolutely no case to rip up valuable undeveloped land (which sits outside urban edge), spend public money and destroy habitats etc, when there isn't substantial inclusive transport benefit or any other form of benefit that this road section enables. Assessment cannot look to any other factor contributions unless they are coming forward here.

If this road proposal – rather - is the facilitator for a proposed future development... then that is how the scheme must come forward and cannot be put forward in any other way than via the larger development proposal. As it stands the last residential development application on this land was not supported, heavily opposed and sits outside the urban edge. For this road to be considered it must come forward as a package with any intended development (be it residential or additional sections of a road extension).

## Further Comment

**The Western Cape Government proclamation of MR0169** (eastern bypass / link road) dated in 1968 (56 years ago), can no longer be assumed relevant in spatial terms for the future development of Stellenbosch. The route has been partially built on and has no basis of reference for this specific development application.

References to **Road Master Plan and CITP**. These are contentious and opposed documents. The Road Master Plan has no legal status and heavily objected to. This document cannot be referenced without having been prepared as a component plan to a *strategic local transport & connectivity plan* (which doesn't exist) and must align with and enable the SDF (2019) ...the only statutory doc. that has been prepared appropriately. The last CITP revision was also heavily objected to but approved in any event by Stellenbosch Municipality.

## BAR Extracts and Comments:

### Extract 1. Page 2 of BAR.

GENERAL PROJECT DESCRIPTION	
(This must include an overview of the project including the Farm name/Portion/Erf number)	
As indicated in the Municipality's 2018 Roads Master Plan (draft 2019) (RMP), the Eastern Link Road (previously incorrectly referred to as the eastern bypass) has been contemplated for a long time but has never been formally adopted due to public and environmental concerns. However, the scale, nature and potential benefits of this project make it an ideal candidate for inclusion in the RMP.	
This route follows the the Western Cape Government (WCG) Proclaimed Main Road 169 (MR0169) alignment and involves the extension of Wildebosch Road from the R44 to Van Reede Road and a connection with Pastorie Road at the Theological Faculty with a new proposed bridge crossing over the Eerste River as a Class 4 Collector Road. Other alignment alternatives would include the widening of the Coetzenburg bridge near the CBD.	
The scope of the Wildebosch extension project forms part of the Provincial MR0169 alignment, however is of a much smaller magnitude. The extension of Wildebosch commences at Paradyskloof Road where a small portion of road reserve exists (Erf RE/16527) and traverses the farmland (RE/369) in a north-easterly direction to meet the existing Trumali Street, currently a surfaced access road to the Paradyskloof Water Treatment Works.	
The primary objective of the project is to provide an alternative road alignment to the recently constructed Schuilplaats Road as a result of the WCG R44 Access Management strategy where closure of several intersections onto the R44 have been and will be implemented; specifically, where Paradyskloof Road onto the R44 was upgraded and turning restrictions were implemented. Thus, the phased implementation of the Paradyskloof-Trumali Street portion of MR0169 will have immediate benefits in providing access to Paradyskloof and proposed residential developments in the Paradyskloof area as a result of these access restrictions on the R44.	

Reference to an 'Eastern Link Road', has no basis or approved status. Any future such scheme is highly contentious and is not in alignment with SDF. How and why is this listed as the main element - para 1 & para 2 - of the project description? It is completely irregular. Paragraph 3 then in referencing this project, as "*much smaller in magnitude*" appears to aim at coercing the reader that therefore its impacts are minimal.

### Extract 2 Page 10 o BAR

3.3	Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.
<b>Introduction</b>	
Stellenbosch Local Municipality under the Department of Roads and Stormwater proposes to develop a road alignment between the suburbs of Paradyskloof and Brandwacht. The project would include an extension of Wildebosch Road and upgrading Trumali Street at Stellenbosch South, within the jurisdiction of Stellenbosch Local Municipality, part of the larger Cape Winelands District in the Western Cape. The Wildebosch extension forms part of the Provincial Proclaimed Main Road 169.	
As shown in figure 1 below and site development plans attached as Appendix B, the extension of Wildebosch commences at Paradyskloof Road where a small portion of road reserve exists (Erf RE/16527) and traverses the farmland (Erf RE/369) in a north-easterly direction to meet the existing Trumali Street, currently a surfaced narrow access road for the Paradyskloof Water Treatment Works.	
The primary objective of the development is to provide alternative road alignment to the recently developed Schuilplaats Road which aligns to the WCG R44 Access Management where closure of several intersections onto the R44 have been and will be implemented. A further benefit of the construction of the Wildebosch extension is that it creates more access opportunities to the R44 for the Paradyskloof area.	

The Schuilplaats Rd link onto Trumali Rd was only recently opened creating the second signalised R44 connection for Paradyskloof. The proposed scheme simply provides an

alternative route to the same Trumali / R44 intersection, but offers no benefit. The traffic impact assessment clearly indicates that the scheme will not result in significant reduction in right turning traffic or improved junction performance at R44 & Blauklippen Road, - this would have been the only impact that may have provided a slight travel time improvement to a handful of residents. Set against the massive costs, environmental impact, and permanent change for the landscape – any few seconds saving could in any event never provide a positive benefit to cost ratio for this scheme.

**Extract 3 Page 10 o BAR**

<p><b>Road Network Context</b></p> <p>The Wildebosch extension forms part of the Western Cape Government's Provincial Proclaimed Main Road 169 (MR00169) to provide alternative access into the Stellenbosch CBD.</p> <p>The proposed Wildebosch Road to Trumali Street extension, in terms of regional access will enable the following:</p> <ul style="list-style-type: none"> <li>• The major function of the R44 is to serve as a north/south (regional mobility) route connecting Strand, Somerset West, Helderberg regions with areas to the north such as Paarl, Wellington and Malmesbury. Additionally, it will connect areas in the south with Stellenbosch.</li> <li>• The dual function results in the R44 being one of the most congested roads in the Stellenbosch area.</li> <li>• The full Wildebosch Road to Trumali Street extension will provide a new link into Stellenbosch midtown as a supplement road to the R44 which in turn will reduce congestion of the R44 and create a new link road for users travelling in the Stellenbosch area.</li> </ul> <p>While in terms of local access, the proposed Wildebosch Road to Trumali Street extension will support the following existing road network interventions:</p> <ul style="list-style-type: none"> <li>• R44 and Trumali Road Intersection is a signalised intersection.</li> </ul>	
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<ul style="list-style-type: none"> <li>• The intersection of Paradyskloof Road approach of the R44 and Paradyskloof Road Intersection was recently converted to a left-in left-out access, with a right-turn for the R44 northbound approach.</li> <li>• The Schuilplaats Road was extended to connect Paradyskloof Road to Trumali Road, to allow the community to easily access the full intersection.</li> </ul> <p>Additionally, no permanent road closures are to occur during construction phase.</p> <p>From a broader context, the phased implementation of the Paradyskloof-Trumali Street portion would also have immediate benefits due to access restrictions on the R44 and proposed residential developments in the area</p>	

It is claimed here that the The Wildebosch Road to Trumali St extension:

*“will reduce congestion of the R44”.*

There is no such evidence in the Traffic Impact Report and this claim must be removed. In simple terms all the link can do for existing residents/users is move some vehicle right turn movements from Paradyskloof onto R44 from Blauklippen Rd to Trumali Road. This may lead to signal timing changes to balance wait times at the two junctions to accommodate but the total vehicles accessing the R44 and impacting on R44 flow will be essentially the same. There is not R44 relief with this scheme.

Last sentence :

*“immediate benefits due to .....proposed residential developments in the area”.*

The case for this scheme cannot be built on assumptions about future (residential & commercial) development. The previous application for residential development of Brandwacht farm, was opposed and summarily withdrawn. It is a development that is outside of the urban edge and is radically opposed. Irrespective of its status it cannot be linked or claimed as a road network benefit of this scheme. The transport and access plan and impacts of such a development must come forward with that specific transport development.

Extract 4 Page 20 of BAR

4.	Explain how the proposed development will be in line with the following?
4.1	The Provincial Spatial Development Framework. 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 emphasizes 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.
4.2	The Integrated Development Plan of the local municipality. As part of the 5 <sup>th</sup> 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 region's 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. 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.
4.3.	The Spatial Development Framework of the local municipality. 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).  Minor focus is given to improving the efficiency of use of existing road space through shifting modes and altering road travel patterns. The proposed development aims to align and extend an existing road (i.e., Wldebosch Road Extension), provide access to the area, ease congestion and change travel patterns, as well as safely accommodate NMT in the form of pedestrians and bicycles.
4.4.	The Environmental Management Framework applicable to the area. There is no Environmental Management Framework (EMF) applicable to the project area.
5.	Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development. Comments from the relevant authorities will be incorporated into the Final BAR.
6.	Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development. <small>The southern portion of the Wldebosch Road extension is situated in Swartland Grasses, Renosterfeld ecosystem and</small>

The author has attempted to find positive re-enforcement for this scheme by selective and incorrect referencing. In fact, the SDF for Stellenbosch clearly states the urgent case for investment in Public Transport and non-motorised solutions and specifically not building roads or road sections to accommodate private vehicles.

The author quotes the following:

*“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).*

*“Minor focus is given to improving the efficiency of use of existing road space through shifting modes and altering road travel patterns”*

Correctly interpreted this extract from the Stellenbosch SDF is stressing the urgency of investment into major traffic reduction, shifts to public transport, non-motorised transport solutions, and not the piecemeal addition of new road sections.

So, this development is comprehensively at odds with the SDF and sustainable transport aims, and this must be clearly stated.

*‘The proposed development aims to ....ease congestion and change travel patterns’*

There is absolutely zero evidence of this in the development proposal.

Extract 5 Page 32 of BAR

8.2.	Explain the socio-economic value/contribution of the proposed development.
<p>The Wildebosch Road to Trumali Street extension would assist in providing improved and eased accessibility to the growing area (i.e., proposed, and planned developments) as well as assist in job creation, skills development, higher levels of mobility, and improved road infrastructure in terms of traffic alleviation and route optimization.</p> <p>The proposed extension will create employment opportunities (although not in significant numbers) during the construction and operation. While the level of unemployment is low in the PSA, the construction of the proposed extension will result in job creation that could benefit either the PSA or the broader municipal area (SSA). During the construction phase, this would occur through direct job creation opportunities related to the construction of the roads and indirectly through expenditure on sectors supplying goods and services. While during the operational phase this would result due to operational expenditure on the ongoing maintenance work post-construction.</p>	
8.3.	Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.
<p>The development itself aims to improve one of the economic infrastructures in the Stellenbosch South area, being the extension of Wildebosch Road and upgrading Trumali Street. This will unlock accessibility and allow economic activities to impact a wider area, including PSA, SSA and TSA.</p>	
8.4.	Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development.
<p>Based on the socio-economic site sensitivity report, the extension of the proposed Wildebosch Road to Trumali may be considered beneficial to the area in terms of an increase in accessibility and transport mechanisms, job creation, and household income.</p> <p>The local as well as broader provincial municipality will likely experience a positive injection resulting from the Gross Domestic Product (GDP) and production generated due to the capital and operational spend. However, taking into account the proximity of the proposed Wildebosch Road extension to farm land and residential area, consideration must be given on whether these areas will be negatively impacted in terms of sense of place and property values.</p> <p>Furthermore, the proposed Wildebosch Road to Trumali Street extension will traverse Erf RE/369 which is utilised for agricultural purposes; thus, it must be understood how the loss of agricultural land would impact the landowner.</p> <p>Regarding socio-economic implications, the screening assessment indicates no major concerns, except for potential negative influences that may result, i.e., sense of place, property values, and agricultural/ land uses, which would require further investigation.</p> <p>Noise during construction – this will be mitigated by managing construction work hours and health and safety on the construction area.</p>	

There is no evidence of the following that is being claimed above:

- Improved and eased accessibility
- Higher levels of mobility (what is this?)
- Traffic alleviation, route optimisation.
- Unlocking accessibility
- Allow economic activities to impact a wider area (??)
- Increased transport mechanisms (what is this???), household income?

This statement:

*'Regarding socio-economic implications the screening assessment indicates no major concerns except for potential negative influences....' !!!*

How can you conclude this if they have not been isolated, assessed, measured, to size and understand the impact.

The upgrade of Trumali Street only allows for the road to be upgraded, with the cross section expanding towards Grondves Farm, alleviating acquisition on Brandwacht Farm.	
Provide a motivation for the preferred design or layout alternative.	
The construction cost estimate is in the order of R30.2m to R31.6m (excluding VAT, contingencies and any land acquisition costs) for asphalt and brick paved sidewalk, respectively.	
Given the minor difference in costs between an interim cross section where only a single sidewalk would be constructed, and ultimate road cross section where sidewalks on both sides of the road will be constructed, it is proposed that the ultimate road cross sections are implemented with a fine asphalt sidewalk.	
Option 2 for Trumali Road cross section is the preferred option as it creates a buffer between existing private farms and also introduces a 10.0 m wide green space between the neighbouring boundary and road to be used for tree planting, stormwater and NMT.	
Provide a detailed motivation if no design or layout alternatives exist.	
Not Applicable	
List the positive and negative impacts that the design alternatives will have on the environment.	
<p><u>Preferred alternative</u></p> <p>Positive:</p> <ul style="list-style-type: none"> <li>• The surrounding communities are farms.</li> <li>• Upgrade of the Trumali Street will affect all the road users in a positive way;</li> <li>• The alignment is optimised to have the least effect on the existing constraints along the road;</li> <li>• Safer travel.</li> <li>• Reduction of traffic from existing build up neighbourhood of Paradyskloof.</li> <li>• Reduced travel times with improved transport efficiency.</li> <li>• More consistent and reliable travel.</li> <li>• Improved amenity for local communities and NMT network.</li> <li>• Considered beneficial to the area in terms of, job creation (especially during construction, however, job creation will not be significant in numbers), and household income.</li> <li>• The extension serves a long-term vision of not only providing access for the property owners in its immediate vicinity, but also areas further away which will eventually be linked to the road.</li> <li>• Has an incremental (i.e., not significant) improvement on the traffic performance in the area.</li> </ul>	
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<p>• The proposed road link does not have any negative impact on the traffic conditions in the area.</p> <p>Negative:</p> <ul style="list-style-type: none"> <li>• Disruption of traffic during construction phase, however considered to be a very low impact.</li> <li>• Botanical impacts which will be mitigated.</li> <li>• Freshwater impacts which will be mitigated.</li> <li>• Loss of agricultural land (extension of the Wildeboch Road).</li> <li>• Impacts in terms of sense of place and property values (extension of the Wildeboch Road).</li> <li>• Noise during construction which will be mitigated.</li> </ul>	

*The construction cost estimate is in the order of R30.2m to R31.6m (excluding VAT, contingencies and any land acquisition costs),*

There is no quantified and accepted benefit stream to set against costs which with all exclusions covered will likely amount to R50m of public spending which, based on the lack of case presented, would constitute fruitless and wasteful expenditure.

These claimed benefits are disputed, there is no evidence presented:

- *Upgrade of the Trumali Street will affect all the road users in a positive way;*
- *Safer travel.*
- *Reduction of traffic from existing build up neighbourhood of Paradyskloof.*
- *Reduced travel times with improved transport efficiency.*
- *More consistent and reliable travel.*
- *Improved amenity for local communities and NMT network.*
- *Considered beneficial to the area in terms of... household income.*
- *The extension serves a long-term vision of not only providing access for the property owners in its immediate vicinity, but also **areas further away which will eventually be linked to the road** (my bold highlight)*

The long term “vision” (for an eastern link road /bypass) is not within the scope of this application and cannot be referenced here in such context. It has no status and is comprehensively opposed.

The only point which I agree with is that the link is as follows:

- *Has an incremental (i.e., not significant) improvement on the traffic performance in the area.*

...and as indicated earlier is not a substantial improvement, cannot even be detected in traffic modelling work undertaken to justify the huge cost and permanent land use change.

Objections based on further points stated in the BAR as follows:

- P38 Section 6. All these statements are incorrect and untrue on the basis of the points made above in this communication.
- P56 Section 4. Socio-economic impacts are not seen as beneficial as evidenced in points made above.
- P57 Section 5. New road surfacing & loss of vegetation has a negative impact on climate change (increased heating) and extreme events (excessive run off, flooding). The claimed positive benefits are false and untrue.
- P57 Section 6. Claim that all relevant specialists have been contacted and that there are no conflicting recommendations. That is not the case. There is no reference to sustainable transport solutions for the town and municipality of Stellenbosch and no one has been referenced that represents this field.
- Section J General. P58-59. Based on the arguments and points made above many of the statements made in this section are incorrect, false & untrue. Crucially, the statement on page 59, included below, confirms that the Traffic Study concurs with a lack of transport impact for the specific scheme, but only if a full Bypass is implemented.

#### Extract 7 Page 59

##### Traffic

According to the findings contained in the Traffic Impact Study, it is recommended that the implementation of the section of link road between Paradyskloof Road and Trumali Street be implemented, as it does not have any negative impact on the traffic conditions in the area and in fact has a long-term benefit of improving the traffic conditions once the full Bypass has been implemented.

2.3.	<p>Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.</p> <p>Easing traffic congestion is consistent with good environment practice (i.e. mitigation of pollution in urban areas), if undertaken in a responsible manner.</p> <p>The project will provide an alternative road alignment to the recently constructed Schuilplaats Road which aligns to the Western Cape Government (WCG) R44 Access Management contract. A further benefit of the construction of the Wildebosch extension is that it creates more access opportunities to the R44 for the Paradyskloof area. The phased implementation of the Paradyskloof-Trumali Street portion would also have immediate benefits due to access restrictions on the R44 and proposed residential developments in the area.</p> <p>Taking into account the low-risk significance after mitigation measures proposed by the specialist as well as those contained in the EMPr have been fully implemented, Zutari is of the opinion that the potential impacts posed by the proposed development can be adequately mitigated to prevent detrimental impacts to the environment.</p> <p>With regards to traffic and municipal SDP, the project is much needed as it does not have any negative impact on the traffic conditions in the area and in fact has a long-term benefit of improving the traffic conditions.</p> <p>None of the potential negative impacts of the project can be considered to be of significant long-term negative consequence on the affected socio-economic and biophysical environment that is extremely difficult to mitigate or undesirable to promote, in other words an environmental fatal flaw.</p> <p>Zutari is also of the opinion that the preferred alternative may be approved on the following rationale:</p> <ul style="list-style-type: none"> <li>• The Wildebosch road link commencing at Paradyskloof is the only connection point that will join the Trumali Street as per the proclaim alignment.</li> <li>• The preferred option will have one crossing over the delineated UCVBW on Farm RE/369.</li> <li>• There is no (assessed) impact that will be cause for concern, provided all recommended mitigation and management measures are fully implemented throughout the project.</li> <li>• All layout alternatives will traverse the high agricultural potential area over Farm RE/369.</li> </ul> <p>The Proposed Wildebosch Road Extension to Trumali Street is concluded, based on the impact assessment, to have low negative impacts on the socio-economic and biophysical environment as well as positive impacts through the provision of an alternative road alignment and improved access opportunities.</p> <p>Zutari does not find any impediment to the application and therefore has no objections to the project going forward, subject to implementation of the Environmental Management Programme (EMPr) and specialist recommendations accompanying this BA Report.</p> <p>Therefore, it is recommended that DEA&amp;DP considers this Impact Assessment Report together with the Basic Assessment Report, specialists reports and EMPr and issue an Environmental Authorisation to Stellenbosch Municipality for the preferred alternative to proceed with the construction of the Proposed Wildebosch Road Extension to Trumali Street.</p> <p>The following conditions are recommended for inclusion in the EA:</p> <ul style="list-style-type: none"> <li>• Condition 1: The EMPr must be fully complied with and included in all tender documentation.</li> <li>• Condition 2: All positive impacts (detailed in this BAR, EMPr, and the attached specialists' reports) must be</li> </ul>
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There is no basis to many of these statements and many are completely untrue and false.

- No evidence of easing traffic congestion with this scheme
- There is no benefit in simply having an alternative road alignment as claimed
- Again, cannot make assumptions about future development possibilities as a source of benefit for this scheme
- Claiming that no potential negative impact is significant!!
- Zutari claim there is no impact that is a cause for concern and has no objections to the project going forward and recommends the construction goes forward.



**Table 4.1: Current LOS at intersections 1 to 5**

Intersection	Peak Period	North LOS			East LOS			South LOS			West LOS			Overall LOS
		L	T	R	L	T	R	L	T	R	L	T	R	
Intersection 1	AM	A	A	-	F	-	E	-	B	F	-	-	-	F
	PM	A	A	-	F	-	F	-	C	F	-	-	-	F
Intersection 3	AM	B	C	-	C	-	C	-	B	C	-	-	-	C
	PM	B	B	-	C	-	C	-	A	C	-	-	-	C

The results in the LOS did not change significantly from prior to the implementation of the link road. This is due to the fact that the implementation of this section of the link road on its own does not have a significant impact on the current intersection performance. The implementation of the full link road where the municipality is moving towards, will however result in improved LOS along the R44.

## 5 CONCLUSIONS

The following conclusions can be made from the study.

- The implementation of the extension of the Wildebosch Road to Trumali Street is a step in the implementation of the long-term higher order roads.
- The proposed extension of Wildebosch Road to Trumali Road does not negatively impact on the traffic condition in the vicinity.
- It does also not have a significant improvement on the traffic performance in the area.
- The eventual implementation of the further sections of the link road will have incremental improvement in the operational traffic conditions along the R44.

## 6 RECOMMENDATIONS

Based on the findings of this Traffic Impact Study, it is recommended that the implementation of the section of link road between Paradyskloof Road and Trumali Street be implemented, as it does not have any negative impact on the traffic conditions in the area and in fact has a long-term benefit of improving the traffic conditions once the long-term higher order roads have been implemented.

The TIA concludes that the implementation of the road on its own does not have significant impact on intersection performance.....only when a full link road is built.

Stellenbosch

28 October 2024

Emma Algotsson

Brandwacht Action Group