

Objection to the Proposed Wildebosch Road Extension to Trumali Street (DEA&DP REF: 16/3/3/6/7/1/B4/45/1342/23)

Date: 28 October 2024

To: PPP@zutari.com

Cc: idp@stellenbosch.gov.za

Introduction

The current Stellenbosch IDP and budget contain a proposal to extend the Wildebosch Road through to Trumali Street in the North as well as to extend the road through to the R44 towards the Techno Park. The budget for both sections is included in the 5th Generation Integrated Development Plan (IDP)2022-2027. An environmental assessment has been undertaken by Zutari, and comments and input are requested.

Objection to Stated Project Purpose

According to the project description that forms part of the SEA (Zutari)

...“the Wildebosch extension forms part of the Provincial Proclaimed Main Road 169. 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 narrow access road for the Paradyskloof Water Treatment Works. The primary objective of the development is to provide an alternative road alignment to the recently constructed Schuilplaats Road which aligns to the Western Cape Government, Department of Infrastructure’s (WCG) R44 Access Management Strategy project, where closure of several intersections onto the R44 have been, and will be, implemented. The phased implementation of the Paradyskloof-Trumali Street portion would have immediate benefits due to current access restrictions on the R44”.

The above description implies a positive value judgement regarding the road extension which is not borne out by the supporting technical reports. The claim that the road is needed to improve traffic flow, is completely baseless. Paradyskloof Rd and Schuilplaats Road and connections to Trumali Road are adequate and uncongested. This new road link provides no relief to the R44 and does nothing to support or improve Non-Motorised Transport (NMT) or Public Transport. From a transportation perspective, there is no case to rip up valuable undeveloped land (outside the urban edge), spend public money, and destroy habitats, etc, when no transport benefit or any other form of benefit has been demonstrated.

The **main project description does not articulate that the road will open-up new land for development** (which is outside the urban edge and currently zoned as agricultural). Rather the purpose of opening-up development land is stated in the Traffic Impact Study conducted as part of the SEA and also alluded to in the Socio-Economic report (see quote below).

Thus, since there is no proven mobility/ transport benefit to be derived from the road, the intended purpose can then only be considered as a facilitator for a proposed future development. That being the case, this is how the project should be described and assessed. The project scope cannot be seen in isolation as merely a wasteful transport investment. To be transparent, the entire scheme of the road **and its consequences for land development** must be assessed in its entirety, and this purpose must be clearly articulated.

As it stands the last residential development application (from 2022) on an adjacent land parcel, also outside the urban edge, was not supported and was heavily opposed. For this road project to be properly evaluated it must be considered as a package together with any intended new development (be it residential or additional sections of a road extension). The community cannot be expected to approve this piecemeal road

extension in isolation and the project cannot be assessed in any other way than as a development proposal, which has not been presented. According to the Socio-Economic report.

*“The Wildebosch Road to Trumali Road 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”.*

None of the latter are quantified or substantiated.

Key Concerns:

Contradictory Justifications: The project description outlined by Zutari (SEA2024) implies a positive value judgment regarding the road extension, which is not borne out by the supporting technical reports, especially the Traffic Impact study, which shows neither positive nor negative impacts of the road on the local traffic operations in the area. The SEA summary report does not clearly articulate that the road will open up new land for development (currently zoned as agricultural), as made explicit in the Traffic Impact Study conducted as part of the SEA. Thus, if it is merely a road project and it does not positively influence traffic flow, it represents an unnecessary expense for Stellenbosch residents.

Inconsistent Information in Technical Reports: This relates to how the road potentially links to the central core of Stellenbosch. In this regard, the traffic impact study states that this road will end at Trumali Road and is not intended to form part of the long-planned Eastern-by-pass. The latter clearly states that the Municipality will no longer pursue this contentious project. On the other hand, the socio-economic report implies that economic benefit can be realized by this road since it will link more directly to the urban core via Van Rhee (not explained), thus better linking Paradyskloof with Dalsig/ Brandwacht, etc. This is a worrying contradiction.

Underplaying of potential negative impacts/ requirement for strict mitigation measures: The overall findings of the SEA fail to adequately address the potential negative consequences of the road, particularly its impact on wetland development and the environmental and aesthetic impact on the recreational and rural landscape.

The freshwater assessment report calls for specific mitigation measures to be implemented to minimize the impact on the freshwater system, especially during the construction phase. It specifies a specific season for construction (i.e. Summer/ Dry season). The report further states:

...“Assuming that strict enforcement of cogent, well-developed mitigation measures takes place (and the implementation of general construction management and good housekeeping practices, as per Appendix F), the significance of impacts arising from the proposed road extension area can be adequately managed”.

The report assumes a project duration of only a few months (not specific). It is my opinion that the municipality will be hard-pressed to manage the contractor’s time frames as this road is highly likely to take more than 9 months to complete. Neither has any assessment been made of the available specialist capacity within the municipality to manage the contractors during the construction phase and ensure implementation of the mitigation measures outlined. This is a key red flag issue.

Scope of Report not Sufficiently Comprehensive: The Socio-Economic technical report states:

*“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.**”*

The concerns in bold are of critical concern to the residents and without the latter assessments the SEA cannot be considered complete.

Consequently, I do not think the SEA can be considered to have clearly stated the true purpose of the project, nor has not comprehensively addressed all likely impacts. The report either underplays some of the highlighted negative impacts or how the required environmental management thereof is to be achieved. This in addition to inconsistencies in how the Traffic Impact and Socio-Economic reports see the long-term linkage of this area to the central Stellenbosch. The latter creates concerns regarding the true purpose of the road extension and the trustworthiness of the findings. Certain of the technical reports do no more than follow due process and show little insight into the culture and nature of Stellenbosch and its residents.

Context:

The Brandwacht Action Group (BRAG) previously expressed similar objections regarding the development of farm Brandwacht no 1049, emphasizing that the Eastern bypass, of which the Wildebosch Extension form part, effectively opens the area for future residential development. This is contrary to the SDF 2019 which indicated the requirement for densification of the core and not extending developing outside the Urban Edge.

It is essential that the municipality take the needs and wishes of the residents and broader community into its confidence and assure the residents of its long-term intentions with regard to the Eastern Link Road/ Bypass which has been opposed by local residents since it was first proposed in the 1960's. The issue of the entire Eastern Link Road should now once and for all be openly addressed and taken off the development agenda as articulated in the Traffic Impact Study for the Wildebosch Extension SEA.

The Wildebosch Extension and/ or the Eastern Link road cannot be forced on the Municipality and its residents by prospective developments given the long-term negative impacts on the surrounding landscape, the rural nature of the area, and likely traffic impact on the heart of our historic town.

Objection

I object to the stated aim and purpose of the road. If the purpose of the road is to improve traffic flow the Wildebosch Extension is completely baseless. Paradyskloof Rd and Schuilplaats Road -Trumali Road connections are adequate. It is noted that the Wildebosch to Trumali segment now opens up the opportunity for further development. Thus, the road **and** the associated land development should be comprehensively assessed in its entirety as a development proposal and not a standalone road project.

Furthermore, I object to the likely continuation of the entire Eastern Link Road as the project is likely to have potential irrevocable negative impacts on the Stellenbosch Community, Stellenbosch Mountain, and its environs. The Wildebosch extension, which stops at Trumali Road, does not and should never continue through Brandwacht, Dalsig, and Welgevallen Proefplaas. The building of this road segment can lead to piecemeal future construction of the Eastern Link Road through to Coetzenburg. The Wildebosch extension serves no purpose in isolation and, as a standalone road, is an irrational and wasteful expenditure of Stellenbosch ratepayers' money.

- The Eastern Link Road is a flawed concept from the 1960s that is no longer feasible or viable for Stellenbosch in 2024 and will serve very little purpose in relieving traffic. The viability of the Eastern

Link Road is in question for various reasons, including specifically the aesthetic and environmental degradation and impact on the mountain bike trails, walking, and recreation in the area in question (especially above Dalsig, over Brandwacht and Coetzenburg and over the Eerste Rivier.

- This is in addition to the likely negative social and economic impact of such a substantial road development and the financial impact of such infrastructure on the municipal financial resources.
- The project does not align with nor support the SDF (2019) which is a statutory document that is supported and was prepared appropriately. Thus, this piecemeal approach to building portions of the Eastern Link Road is misleading and poses long-term risks to the community and environment.
- The opening of agricultural land for residential or other development in the Brandwacht/Paradyskloof area is contrary to the densification strategy of the town and the stated greater focus on public transport-orientated development in the wider municipal area, as envisaged by the SDF.
- Densification and containment of urban expansion, as well as improved Transport Orientated Development, should be a critical municipal response to the National Spatial Development Framework (NSDF 2018).
- Furthermore, there is no indication that the municipality has undertaken an adequate technical, financial, and legal feasibility assessment of the Wildebosch Extension and its consequential opening of the areas to further development in the surrounding areas and as such, is not supported.

Call to Action:

The municipality must prioritize community needs and transparently communicate its intentions regarding this road project and associated land development. Furthermore, it is imperative to reconsider the relevance of the Eastern Link Road, which has faced local opposition for decades and must align future developments with the Spatial Development Framework 2019.

In lieu of road expansions, I urge the municipality to invest in sustainable transport solutions, such as the planned Park and Ride projects in order to address the mobility needs of university students and local workers who cannot afford to live in the town and not to build roads that compromise our unique historic and environmental landscape.

Conclusion:

I strongly oppose the Wildebosch Extension, the consequential opening up of development land, and the potential continuation of the Eastern Link Road due to its anticipated negative impacts on our community, environment, and on municipal resources. This proposal does not align with the current needs of Stellenbosch.

Thank you for considering these objections/ inputs.

Sincerely,
Emma Algotsson
On behalf of the Brandwacht Action Group (BRAG)