



FRIENDS OF STELLENBOSCH MOUNTAIN

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Comments on the draft
August 2019 Roads Master Plan (RMP)
June 2020 Comprehensive Integrated Transport Plan (“CITP”)
December 2020 NMT Master Plan (NMTMP)
as respectively approved for comment or accepted at the
Stellenbosch Municipality Council Meeting of 2021-04-28

2021-06-14

BY EMAIL to engineering.services@ Stellenbosch.gov.za

AND TO the SMF (Stellenbosch Sustainable Mobility Forum) email list

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1 Status of the 2021 “Comprehensive Integrated Transport Plan”

1.1. Reason for inclusion of comments on the 2021 “CITP”

- 1.1.1 A draft Roads Master Plan (“RMP”) and a draft NMT Master Plan (“NMTMP”) were tabled respectively under Items 11.5.3 and 11.5.4 at the Council meeting of 28 April 2021. They were approved for advertisement within a public participation process. Also included in Item 11.5.5 of the same Council agenda was a “Request for approval of the Comprehensive Integrated Transport Plan” (CITP).
- 1.1.2 Of course a proper CITP can and must be compiled as a matter of urgency, and of course a proper CITP must also be implemented rather than just shelved or ignored, as Stellenbosch Municipality (SM) has been doing ever since the 2016 CITP was approved.
- 1.1.3 We will show in the remainder of these comments that the 2021 “CITP” as accepted on 28 April 2021 is neither an “Update” as claimed in Item 11.5.5 of said council agenda, nor is it a proper CITP in its own right. It is an attempt to smuggle in fundamental changes in direction into the existing 2016 CITP while pretending that they merely constitute an “Update”. We hence call the 2021 “CITP” in these comments, with the quote marks pertinently added to indicate its dubious status.
- 1.1.4 No public participation was requested or approved for the 2021 “CITP”; instead, the 2021 “CITP” was simply accepted by Council. The claimed “targeted consultation” was nothing like real public participation. The present comments must therefore necessarily be included as a part of the RMP and NMTMP public comment period. We do so only under protest, because the 2021 “CITP” should have had a separate public participation process or preferably should not have been tabled at all.
- 1.1.5 At its meeting of 26 February 2020, Council had earlier approved a so-called Section 78(3) report entitled *Providing Bulk Parking for Stellenbosch Municipality* (“BPSM”). The contents of that report will also be relevant within the present comments.

1.2. On the primacy of Integrated Transport Plans

- 1.2.1 Transport legislation attaches primary importance to the compilation and implementation of a CITP or, for smaller municipalities, an ITP. A simplified diagram setting out this hierarchy is shown in Figure 1 below.
- 1.2.2 The legal hierarchy of importance is clear:

The CITP or ITP is the legal instrument for transport planning, in conjunction with the IDP, the MSDF and the EMF. The RMP has no status in law on its own; it is at best a subordinate sectoral plan

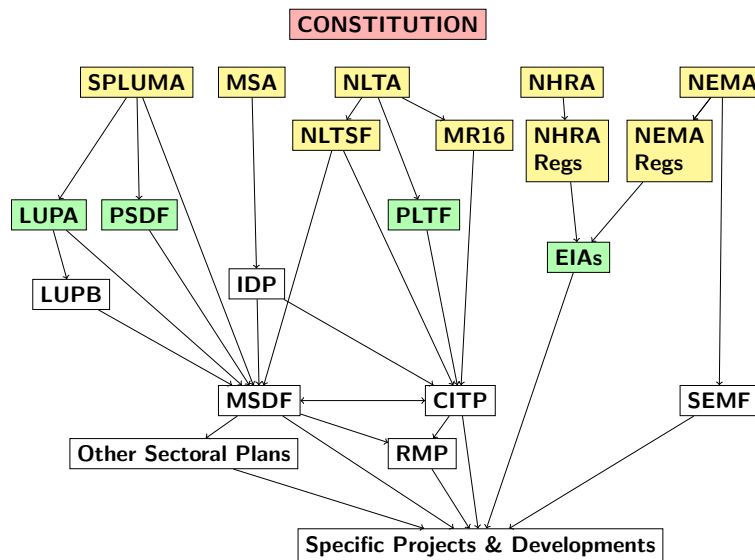


Figure 1: Simplified diagram of legislation pertaining to transport. The CITP is governed by, and must comply with, the national and provincial legislation (NLTA, NLTSF, MR16, PLTF), guided by the local IDP and MSDF. The RMP is a low-level sectoral plan with no legal status. The CITP determines and prescribes the content of the RMP, not vice versa. See Appendix A for a more detailed explanation of all the acronyms.

which is supposed to implement a particular aspect of the strategy and plans set out in the CITP. The CITP and MSDF set the agenda, not the RMP.

In fact, not one of the laws or regulations on national level even mention a Roads Master Plan; it is simply not part of the prescribed planning structure. This has been pointed out many times in emails, previous comments, newspaper articles and at the Stellenbosch Mobility Forum.

- 1.2.3 It is therefore irrational and contrary to the legal hierarchy to request public comment on a low-level sectoral plan such as the RMP while the 2021 “CITP” itself is not scrutinised and commented on. The RMP issue is taken up again in Sections 2 and 5 below.
- 1.2.4 As set out in the subsections below, the 2021 “CITP” which was finalised in June 2020 but appears in the Council agenda of 28 April 2021 in itself is beset with serious procedural and content problems. It is therefore imperative to comment on, and point out, on these serious deficiencies and the seriously flawed process which led to its tabling and adoption by Council.
- 1.2.5 The remainder of this section considers the lawfulness of the 2021 “CITP” and its acceptance by Council in terms of the 2021 “CITP” contents, the council agenda item and in context with earlier versions.

1.3. The various CITP versions: Basics and Timeline

- 1.3.1 A “Comprehensive Integrated Transport Plan 2016–2020” was prepared by external consultant *Royal HaskoningDHV* and published in four parts which comprised (with title pages) 94, 105, 93 and 86 pages for a total of 378 pages. The final version is dated 12 February 2016.
- 1.3.2 Item 8.1 of the agenda of the 39th Council meeting of 30 March 2016 tabled and approved the said 2016 CITP compiled by Royal HaskoningDHV to be submitted to the MEC for approval (see Pages 303 to 400 of that agenda). Only the table of contents plus comments on the draft were included in that agenda.

- 1.3.3 The 2016 Royal HaskoningDHV CITP was subsequently submitted to then MEC Donald Grant for approval on 31 May 2016. It is therefore the official and legally valid Stellenbosch CITP which we call the “2016 CITP”.
- 1.3.4 A document entitled *Update - Stellenbosch Comprehensive Integrated Transport Plan* with date October 2018 and authored by consultant *Kantey & Templer* was never made public by SM. For reference purposes, we shall call it the “2018 KT Report” below. The 2018 KT Report was not tabled for approval by Council. Only after the Stellenbosch Mobility Forum meeting of 31 May 2021 has this document suddenly been made available to FSM. It does not appear in a google search as of 12 June 2021, the date of these FSM comments, and so is not available to the public at large at this stage. The 2018 KT Report may nevertheless have been submitted to the MEC for approval, as if it was a CITP Update, without the public’s knowledge or input.
- 1.3.5 A document entitled *Update of the Comprehensive Integrated Transport Plan (CITP) for Stellenbosch Municipality*, authored by *Innovative Transport Solutions* (ITS), was tabled along with an introductory agenda item (Item 11.5.5 of the agenda) at the Council meeting of 28 April 2021. It was finalised in June 2020. We call this document the 2021 “CITP”.
- 1.3.6 To our knowledge, no other update of the 2016 CITP was tabled at any Council meeting in the period between March 2016 and April 2021. In summary, we have therefore three versions before us, the 2016, 2018 and 2021 versions, of which in our view only the original 2016 CITP is lawfully compliant.
- 1.3.7 If, as we claim and set out below, only the 2016 CITP is legitimate, the approval by Council in April 2021 of the 2021 “CITP” was inappropriate and does not hold up to scrutiny. It may have been unlawful.
- 1.3.8 The three CITP versions are far too large to be appended in full to this analysis. Full versions of the 2016 and 2021 versions are available on the internet, these and the 2018 version can be supplied by FSM on request.

1.4. Relevant wording of Item 11.5.5 of Council meeting of 2021-04-28

Item 11.5.5 of the Agenda of the 42nd Meeting of the Council of Stellenbosch Municipality held on 28 April 2021 is entitled REQUEST FOR APPROVAL OF THE COMPREHENSIVE INTEGRATED TRANSPORT PLAN. This item contains in its Annexure A the 2021 “CITP”. The text of Item 11.5.5, comprising Pages 767 to 770 of said council agenda is attached in Appendix B below.

1.5. Some relevant sections in transport legislation

- 1.5.1 Section 11(1)(c) of the National Land Transport Act (NLTA) is reproduced in Appendix C which sets out the responsibilities for the municipal sphere of government. We highlight here and in the appendix the following relevant parts:
 - (i) incorporation of spatial development policies (MSDF, IDP, SPLUMA, PSDF etc);
 - (iv) ensuring the **implementation** of its policies;
 - (v) financial planning;
 - (xi) marketing and promoting public transport;
 - (xvi) applying traffic management techniques (see also (xxii));
 - (xvii) manage municipal roads (of course);
 - (xviii) **planning, implementation and management of modally integrated public transport networks and travel corridors for transport;**
 - (xix) to achieve subsection (iv), conclude **service level planning for passenger rail on a corridor network basis;**
 - (xxii) formulating and applying **travel demand management measures.**

- 1.5.2 We refer below to the *Minimum Requirements for the Preparation of Integrated Transport Plans*, GNR 881 of 2016 (“MR16”). As stated in Section 2 of MR16, the provisions are a *minimum* with which planning authorities (Stellenbosch Municipality) *must* comply.
- 1.5.3 Regarding ITP updates, MR16 states that *5. FREQUENCY OF PLAN PREPARATION AND UPDATE: ITPs are prepared for a five-year period, thus a new ITP must be prepared every five years. On an annual basis, updating of selected aspects must be carried out. The minimum frequency of plan preparation and updating is shown in Table 1.*
- 1.6. Hence the question arises: **Is the 2021 “CITP” really an “Update” or an attempted “5-year Overhauled” CITP?**
- 1.7. We have undertaken a reasonable study of the 2021 “CITP” within the available time. Details of that study can be found in Appendix D. Based on that study as well as on the detailed analysis of the funding requirements of Section 12 of the 2021 “CITP” as set out in Section 2, our answer is this:

The 2021 “CITP” is neither an update nor a 5-year overhaul as specified in the Minimum Requirements 2016 regulations. Instead, it constitutes a major departure from the MSDF, IDP, the MR16 and Section 11(1)(c) of the NLTA.

- 1.8. Even a cursory inspection of the 2021 “CITP” will reveal that it cannot possibly be a standalone 5-year overhaul of the 2016 CITP. While it tries to keep to the chapter headings prescribed in MR16, its content is highly incomplete. The 2016 CITP comprises 378 pages; the 2021 “CITP” comprises 185 pages or 172 pages if you exclude the extraneous powerpoint slides and maps. The 2016 CITP contains 95 figures; the 2021 “CITP” contains 34 figures. Enough said.
- 1.9. Item 11.5.5 of the council agenda makes multiple claims that the 2021 CITP is an *annual update*, that a five-year review (ie a *comprehensive update*) is to follow in a year’s time, that full stakeholder participation as required by MR16 did not happen but is planned for the future. The resulting recommendations in Item 11.5.5 also refer unambiguously to an *annual update*.
- 1.10. Contrary to that item’s text, the 2021 “CITP” is not an update for the following reasons:
 - 1.10.1 Firstly, the 2021 “CITP” in its sections 3.13 to 3.18, 7.1, 7.2 and in particular in its Section 12, all related to road-related issues, constitutes a major departure both from the principles and specifics of the 2016 CITP.
 - 1.10.2 The requirements of any CITP, update or not, to comply with the existing IDP and MSDF have not been satisfied by the 2021 “CITP”.
 - 1.10.3 Not only is the 2021 “CITP” a major departure from the 2016 CITP, but it constitutes a major departure from many of the subsections of the NLTA S11(1)(c) highlighted above.
 - 1.10.4 The overwhelming focus on, and financial bias towards, car-related travel also represents a major departure from stated government goals to alleviate poverty and reduce inequality. The proposed major road-building programme as proposed by the RMP and 2021 “CITP” subsidises the rich and fleeces the poor: see Section 3 below.
 - 1.10.5 In addition, the 2021 “CITP” does not fulfil the MR16 requirements on what an update should be and contain. See the exact wording of what an annual update should be in Paragraph 5.1 of the MR16 as reproduced in Appendix E. That Paragraph contains five subparagraphs itemized by bullets as follows:

- Bullet 1 The 2021 “CITP” does to some extent satisfy the first bullet point (new data collection).
- Bullet 2 The 2021 “CITP” fails to describe any progress with implementing the ITP in the previous year or at best describes only some minor road improvements.
- Bullet 3 The 2021 “CITP” does not document which contracts have been awarded or which have expired, and says nothing about changes or additions to the proposed contracted services network.
- Bullet 4 The 2021 “CITP” does satisfy this requirement of reporting on the updated database of Operating Licences.
- Bullet 5 This bullet point pertains exactly to the projects, programmes and budgets of Chapter 12 of a CITP which has been scrutinised in detail in Section 2. That analysis has shown conclusively that Section 12 of the 2021 “CITP” is completely contradictory to the intent and specifics of the 2016 CITP and, of course, the underlying legislation. **Spending more than ninety percent of all funding on road and parking infrastructure is incompatible with the 2016 CITP and overarching policy and legislation.**

1.11. **Item 11.5.5 therefore misled Council into believing (a) that the 2021 “CITP” as appended was an annual update when, in fact, it is neither an update nor a five-year overhaul, and (b) that the changes made in the 2021 “CITP” compared to the 2016 CITP were minor when in fact they were drastic.**

1.12. Not only the text of Item 11.5.5 but also the 2021 “CITP” itself is misleading in content:

- 1.12.1 The funding numbers provided to Council in the 2021 “CITP” are not only unbalanced, but simply wrong in critical aspects; see Section 2.
- 1.12.2 In particular, it is not a triviality to simply “lose” or “forget” R126 million in spending, as the 2021 “CITP” has done in Table 12.1. Neither is it permissible to compare “apples with oranges”, i.e. planning-only costs with planning-plus-construction costs, as the 2021 “CITP” has done.
- 1.12.3 Important figures in the 2021 “CITP” were simply left blank; see Appendix D.
- 1.12.4 As already set out, the 2021 “CITP” represents a major departure from multiple requirements, but none of that is made clear in the 2021 “CITP” document itself or the accompanying item.

1.13. Misleading Council is an offence in terms of the *Code of Conduct for Municipal Staff Members*. In Schedule 2 of the Municipal Systems Act of 2000 we read that

7(h) A staff member of a municipality may not — (b) mislead or attempt to mislead the council, or a structure or functionary of the council, in its consideration of any matter;

- 1.14. The misleading in question is not minor in nature. If correct information had been supplied to Council in Item 11.5.5, no doubt there would have been much greater scrutiny of the entirely new content, vision, change in strategy and funding allocations of the 2021 CITP by Council. Approval of the 2021 CITP was therefore based on insufficient scrutiny which in turn was based on the misleading wording of Item 11.5.5 as well as the silence of the 2021 “CITP” itself.
- 1.15. In the question of misleading, intentionality is irrelevant. It does not matter whether such misleading was deliberate or the result of an oversight, personal stress or coercion, miscommunication or any other factors. Process, compliance and content are crucial, not intention.
- 1.16. Given that the 2021 “CITP” is fatally flawed and was approved on misleading premises, Council should rescind its decision to approve the 2021 “CITP”.

2 Budget imbalance

- 2.1. In this section, we show that there is an overwhelming imbalance in the planned and projected capital spending on “sustainable mobility and transport” (SMT) as compared to “individual car- and road-related” (CRR) spending. For practical purposes, we will at times lump the categories *Integrated Planning*, *Public Transport* plus *NMT* into the SMT (sustainable transport) supercategory, while joining categories *Roads Infrastructure* and *Parking Infrastructure* into the CRR (car-related) supercategory.
- 2.2. We will use here numbers derived from Section 12 of the 2021 “CITP” rather than the RMP and NMTMP, because the 2021 “CITP” is more up to date than the 2018 estimates of the RMP and supposedly (?) uses consistent methodology across the different categories.
- 2.3. For reference purposes, we reproduce in Table 1 the original Table 12.1 of the 2021 “CITP” as also shown on “Page 928” in Appendix F. All amounts are in millions of Rands.

Project Category	Project Budgets Per FY in R Million					
	2020/21	2021/22	2022/23	2023/24	2024/25	Total
Integrated Planning	4.00	3.80	5.60	22.60	1.70	37.70
Public Transport	36.80	15.25	27.00	18.50	7.50	105.05
NMT						126.30
Roads Infrastructure	25.31	244.40	242.40	758.20	112.10	1382.41
Total (R million)	66.11	263.45	275.00	799.30	131.30	1525.16

Table 1: *Copy of the original 2021 “CITP” Table 12.1 as it appears in the 2021 “CITP”.*

- 2.4. This original table is seriously wrong in a number of ways:
 - 2.4.1 Firstly, of the 5-Year totals marked in red, the orange amount of R1525.16 million is incorrect; it should be R1651.46 million. The calculation omitted the R126.30 million of the NMT total.
 - 2.4.2 Secondly, the costs of parking infrastructure were omitted even though these are much larger than the three SMT categories combined.
 - 2.4.3 Thirdly, the numbers are “comparing apples with oranges” in that some projects are costed only with respect to their planning phases, while others are costed for the entire sequence of planning, design, construction and contingencies (called “PDC” in Section 12 of the 2021 “CITP”, below and in the appendices).
 - 2.4.4 In addition, many projects are not costed at all in Section 12 of the 2021 “CITP”; see Appendix F. The numbers in the RMP Table 8-2 appear outdated and in some cases significantly underestimated. Notably, only one of the three legs of the proposed **Western Bypass** (projects SRMP001, SRMP002, SRMP003) were costed in the 2021 “CITP”, and the necessary intersections were also left out (SRMP022 to SRMP025). Similarly, the controversial **Eastern Link Road** (SRMP052) was not taken into account in the calculations leading to Table 12.1.
- 2.5. It is impossible to correct the above deficiencies in detail. All that can be done is to take educated guesses and apply ad hoc correction factors so as to at least obtain some rough estimate of the true state of affairs. We therefore apply the following ad hoc corrective measures, in the knowledge that these are estimates and incomplete:
 - 2.5.1 The incorrect amount of R1525.16 is easily fixed. It is disconcerting, however, that R126.30 million was simply “forgotten” in this critical Table 12.1 and that no one noticed the error. Did anyone apply their minds or was the 2021 “CITP” just signed off?

- 2.5.2 To estimate parking infrastructure costs, we made use of numbers taken from Table 5.4 of the February 2020 Section 78 Parking Report; see Appendix G.
- 2.5.3 To compare “apples with apples”, in this case fully PDC-costed projects, we used heuristic information that planning and design costs are typically 14 to 20 percent of the total costs. This is done by means of correction factors of 7 (for a 14.3 percent case) and 5 (for a 20 percent case), called “Maximum” and “Minimum” below and also in Appendix H.
- 2.5.4 Short of re-costing every single of the many uncoded project items, we simply took some ballpark guesses for the missing parts of the Western Bypass. We also used a guesstimate of R120million for the set of projects which would include a purported Eastern Link Road and other uncoded projects, without trying to subdivide this guess into individual components. Many other roads projects uncoded in Section 12 of the 2021 “CITP” were still left out.
- 2.5.5 In addition, we tried to quantify the effect of including only high-priority projects or of also including medium-priority projects with some weighting factor as set out below.
- 2.6. In summary, we have done our best to arrive at realistic estimates for SMT versus CRR funding estimates. A first result of these corrections appears in Table 2 below. In this Table, the minimum and maximum costing factors were applied to entire project categories without trying to look at individual underlying projects. The results are devastating: in this scenario, SMT projects would get 2–3 percent of the total funding, while 97–98 percent would go towards CRR.

Project Category	5-Y Total Minimum	5-Y Total Maximum	Percent Minimum	Percent Maximum
Integrated Planning	37.70	37.70	0.47	0.35
Public Transport	105.05	105.05	1.32	0.98
NMT	126.30	126.30	1.59	1.18
Road Infrastructure	6912.05	9676.87	86.82	90.22
Parking Infrastructure	780.45	780.45	9.80	7.28
Grand Total (R million)	7961.55	10726.37	100.00	100.00
Sustainable mobility Car- and road-related	269.05 7692.50	269.05 10457.32	3.38 96.62	2.51 97.49
Grand Total (R million)	7961.55	10726.37	100.00	100.00

Table 2: 2021 “CITP” Table 12.1 (All coded projects) corrected by factoring in estimated construction costs. Numbers from the 2020 Parking Report have been added. “Total Minimum” assumes that “Planning and Design” amounts to 20% of total costs (i.e. that Construction amounts to 80%). Likewise, “Total Maximum” assumes that “Planning and Design” amount to 14.3% of total costs. A complete version of this table appears in Appendix I.

- 2.7. It must be noted that, of the total amount of R105.05 million over 5 years for “Public Transport” R69.55million is earmarked for taxi ranks and associated infrastructure, leaving just R35.50 million to be spent on public transport infrastructure outside of minibus taxis. As a percentage of the totals shown above, this is miniscule. This directly violates the spirit and letter of the NLTA, MR16, IDP and MSDF.
- 2.8. The above calculations were refined by reverting to the level of individual projects as set out in Tables 12.2 to 12.5 of the 2021 “CITP”. These tables are reproduced in their original form in Appendix F.

- 2.9. A suitably corrected table appears in Appendix H. The uncosted Western Bypass and Eastern Link Road are marked as green cells in those tables, and an educated (and very conservative) guess of costs based on similar other roads was made at R100million for SRMP003 planning and R120million for Eastern Link SRMP052 et al planning respectively.
- 2.10. On the other hand, as shown in the appropriate columns of the original tables in Appendix F, not all projects listed have high priority, i.e. not all medium- and low-priority items listed will actually be built.
- 2.11. To take this uncertainty into account, we weighted Medium-priority costs by a factor of 50 percent and High-priority ones by 100 percent in calculations shown in Appendix H while still factoring in construction costs where appropriate.
- 2.12. Making these reasonable assumptions leads to the results shown in Table 3 below.

Project Category	H + M Minimum	H+0.5M Minimum	H + M Percent	H+0.5M Percent
Integrated Planning	140.90	89.65	1.68	1.68
Public Transport	181.05	181.05	2.16	3.40
NMT	126.30	98.82	1.50	1.85
Road Infrastructure	7170.41	4182.26	85.37	78.43
Parking Infrastructure	780.45	780.45	9.29	14.64
Grand Total (R million)	8399.11	5332.23	100.00	100.00

Sustainable mobility	448.25	369.12	5.34	6.93
Car- and road-related	7950.86	4962.71	94.66	93.07
Grand Total (R million)	8399.11	5332.23	100.00	100.00

Table 3: *Calculations based on full high-plus-medium priority and on high-plus-halfweighted medium-priority (“H+0.5M”) projects only, omitting low-priority items altogether. For the full calculations using numbers from individual projects as supplied by Tables 12.2 to 12.5 in the 2021 “CITP”, see Appendix H. “Minimum” again refers to a construction factor of 5.0 being applied rather than 7.0.*

- 2.13. **The above are all estimates, but they show unambiguously that the overwhelming fraction — always over 90 percent — of projected funding is to be applied towards CRR (roads and parking).**
- 2.14. For the purposes of these determinations, the **source of funding** is irrelevant. Budgetary constraints are well known, and so any funding from any source which is directed towards roads and parking will thereby not be available for the sustainable transport components.
- 2.15. **Private donations** would of course be welcomed. However, there may be no *quid pro quo*. Stellenbosch Municipality would be guilty of corruption were it to alter its policy and plans so as to favour such donors directly or indirectly. Private donations must come with no strings attached.

3 Poverty, roads, and subsidising the rich

This section is in parts a verbatim repetition of comments already made in a 2018 appeal against the so-called “upgrading” of the R44 between Somerset West and Stellenbosch town. There is a strong correlation between personal income, choice of mode (NMT, public transport, private vehicle) and the implications for mobility planning and funding.

- 3.1. There is consensus among experts worldwide that there is a **strong correlation between income level and Private Vehicle (PV) use: the higher the income, the higher the percentage of PV use**. Put plainly, **poor people walk, cycle and use minibus taxis** and, where possible, **trains and buses**, while those who can afford to use a PV do so due to the convenience and time savings.
- 3.2. All legislation since 1994, from the National Development Plan downwards, has emphasised the principles of sustainability and specifically reducing poverty; see for example Section 4.3.6 of the NLTSF and, by example, in its Executive Summary,

*Proper monitoring and review of the KPIs (Key Performance Indicators) will ensure a balanced view at the national, regional and local levels of **the critical role of transport services in reducing poverty**, facilitating growth and contributing to achievement of key development targets and sustainability.*

and in its Section 3.2.1

The low income people in South Africa spend about 40% of their income on transport. The big cost of mobility and the constraint it places on the lower income earners limits their ability to access healthcare, social and economic opportunities (Statistics South Africa 2013). Mobility has a profound effect on poverty where incidence of low mobility and unaffordable public transport would restrict entire households from economic opportunities.

- 3.3. The correlation between income and PV use is apparent in the mobility figures for commuter trips into and within Stellenbosch. The following figure is taken from a 2018 presentation by Transport Futures consultants. On the one axis is the length of the trip, on the other the type of transport used (“modal split”). Heights represent the number of users. Green=walking, Brown=cycling, Blue=rail, Khaki=schoolbus, Yellow=minibus taxis, Red=car-sharing, Black=cars, MBT= Minibus taxis. See also Section 4.6.3 of the RMP.
- 3.4. It is clear that low-income commuters, so-called “captive users”, overwhelmingly rely on walking, minibus taxis and rail (the green, blue and yellow bars in the lefthand panel), while the more well-off “choice users” overwhelmingly use private vehicles (the red and black bars in the righthand panel).
- 3.5. Figure 4-6 of the RMP conveys the same message: the high-income occupancy rate is 1.1, while the low-income occupancy ratio is 2.6. Poor people do not cause congestion on roads; rich people do. For the purposes of traffic, anyone who can afford to own and operate a light vehicle and regularly travel alone in it is called “rich”. The income required to achieve this standard of living is beyond most South Africans.
- 3.6. Of course minibus taxis make use of roads. Using that as a motivation for spending on new road construction is misleading, however, because 87 percent of road users are cars (“light vehicles”) and so the congestion is caused not by the poor being transported in taxis but by the rich who mostly travel alone in their cars and thereby take up too much road space.

4 Railway transport and the Adam Tas Corridor

- 4.1. The Adam Tas Corridor (ATC) project has been touted as the largest opportunity within Stellenbosch town planning for decades. It has the potential to make or break the proper urban structure in the coming decades. On the one hand, if it is built around Transit Oriented Development — as set out as principle in the MSDF — then many problems of Stellenbosch town planning will automatically be solved. If, on the other hand, the ATC becomes just another opportunity for reckless road- and traffic-driven urban sprawl, then the problems of Stellenbosch will multiply.

Mode Split for Commuting Trips into and within Stellenbosch Town

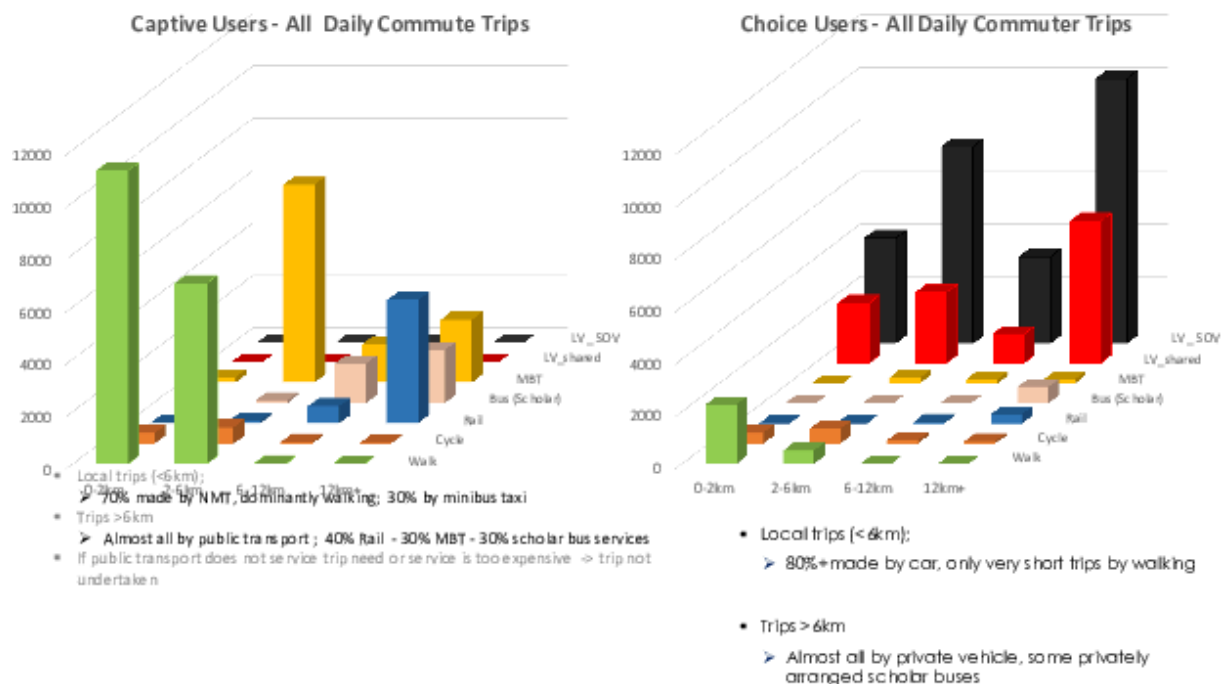


Figure 2: Poor people (“Captive Users”) use public transport and NMT; rich people (“Choice Users”) use cars. Figure showing “modal split” as a function of distance i.e. how many people use which type of transport.

- 4.2. The ATC is centered on two railway stations, namely Stellenbosch Main Station and Du Toit Station, and in its extended form would encompass railway stations both along the south-west and northwards rail route.
- 4.3. Rail transport is the backbone of Transit-Oriented Development. The ATC will only fulfil its potential of that backbone is properly connected to the other modes through **modal interchanges** at these stations, especially Public Transport (buses, taxis, light rail connectors) and to NMT facilities in the town centre.
- 4.4. It is therefore of utmost concern that neither the 2021 “CITP” nor the RMP nor even the NMT MP take the central role of these modal interchanges into account.
- 4.5. On that count alone:

In failing to assign in their planning concepts a central importance to rail transport and to the railway stations and surrounding precincts, and in failing to understand or address the dire need for concomitant investment, the 2021 “CITP” and RMP have fundamentally failed to fulfil their most important task.

- 4.6. This failure is almost invisible since the ATC and rail occupies almost no space in the 2021 “CITP” and none in the RMP. We also note that the Adam Tas Corridor project is not costed at all in the extensive list of projects. In other words, Section 12 of the 2021 “CITP” simply omits the single most important project in all of Stellenbosch town planning.
- 4.7. Council has passed several resolutions in support of the ATC, the last one at its meeting of 2020-07-29. Given the acceptance of the 2021 “CITP”, Council has set itself up to sabotage the very project which it purports to be supporting.

5 Comments on the draft Roads Master Plan

- 5.1. As already set out in Section 1, a Roads Master Plan (RMP) in any form is a subordinate and unnecessary document. The primary planning instruments are the CITP and MSDF. These instruments should drive any road infrastructure planning and construction rather than being driven by them. The RMP therefore constitutes a back-to-front approach where the tail is wagging the dog.
- 5.2. Stellenbosch Municipality has chosen to put out for comment only the RMP and NMTMP while not requesting comment or meaningful input into the critically important CITP. FSM does not accept this policy and submits the present RMP comments only under protest and conditional on all the issues raised in previous sections.
- 5.3. Section 2 on the overwhelming imbalance in planned capital spending is directly relevant to the RMP, and all comments made there are hereby included in the comments on the RMP also. We have shown that 93 to 97 percent of budget totals is planned to be spent on road construction and parking infrastructure.
- 5.4. The exclusive focus on private cars as the exclusive quantity to be is therefore pro-rich and anti-poor; see Section 3. The fact that only a few percent of total funding towards those transport modes most needed by the poor proves this without a doubt.
- 5.5. Figure 4-6 of the RMP tells the same story: the high-income occupancy rate is 1.1, while the low-income occupancy ratio is 2.6. Poor people do not cause congestion because they travel in groups; rich people do because they travel alone.
- 5.6. There is so far no data on the average total kilometres travelled annually as a function of household income. It is reasonable to assume that poor people traverse fewer kilometres than rich people do.
- 5.7. If the proper and prescribed process had been followed, the CITP would have prioritised capital spending on Public Transport, with far more projects beyond basic minibuss taxi items being planned and costed. The CITP would, if it had been done correctly, of course also have taken into account roads and road planning also — but as part of the integrated TOD- and TDM-driven approach.
- 5.8. Serious doubt must be cast on the traffic modelling which forms the basis for many conclusions in the RMP. As Section 4.6 of the RMP makes clear, the EMME model is aware of and makes use of vehicle occupancies. Yet the occupancy numbers are merely used as **constants** as an input into calculating the number of cars on a particular route. **This is a fundamental error. Occupancies are not supposed to be unchanged constants but variables. Changing from low to high occupancy is a primary task of traffic planning; it is a major component of TDM. If the RMP models are ignorant of this fundamental flaw in their model, their results cannot be taken seriously.**

- 5.9. **Specifically, to earn its large fees for producing any results, any traffic modeller should at a minimum be required — by the Terms of Reference — to produce a complete sensitivity analysis of their modelling results as a function of changing occupancy from, say, 1.1 to 2.0.**
- 5.10. The fact that a sensitivity analysis as a function of occupancy appears to have been missing from the Terms of Reference for the RMP is a fundamental error and negligence on the part of the Department of Infrastructure Services.
- 5.11. Because all modelling results depend strongly on the numeric values of occupancy used, **not one of the numerous modelling results is credible.** The EMME model results accept as inevitable that very number (the occupancy) which is supposed to be the prime subject and target of traffic planning.
- 5.12. Once again it must be repeated what has been said numerous time already.

In Summary: Occupancies and traffic growth rates are not constants but variables whose effect must be understood and which must be changed.

- 5.13. On the basis of the failure of the RMP to take this into account, it is necessary to state unequivocally that

The RMP needs to present results, and show graphical figures equivalent to all those shown at present, for a substantially higher occupancy level and lower traffic growth rates.

- 5.14. Furthermore, not only must the sensitivity be understood, but the RMP should be led by legislation and the CITP and fall into the overall TDM strategy:

Until there is a credible strategy and a serious implementation effort in place to increase vehicle occupancies and lower traffic growth rates, not one of the motivations for new road construction in the RMP is credible.

- 5.15. While the above primitive just-test-sensitivity approach is a good start, a proper analysis would take into account not only simple changes in parameter values for occupancy and growth rates, but implement a time-variable growth or attenuation scenario for these variables.
- 5.16. Given these weaknesses of the current modelling,

Any reference to congestion as a motivation for road construction is invalid until the above variables have been properly and honestly modelled.

- 5.17. Within a proper TOD- and TDM-prioritised approach, some of the 84 projects listed in Table 12.5 of the 2021 “CITP” and the RMP would of course be incorporated and funded. Given the fundamentally wrong current approach, it is not conducive to even argue individual projects. **The entire planning project should be reset and restarted under the correct basic premises and fundamentals.**
- 5.18. The comments and issues raised in the October 2018 comments by FSM on the RMP, MSDF and CITP are incorporated into these comments as they are still relevant. See Appendix J for the title page. The full 2018 FSM comments are available as a separate file.

6 Comments on the draft NMT Master Plan

- 6.1. There was no time to scrutinise the NMTMP and to comment on its merits.
- 6.2. The analysis of funding as presented in Section 2 shows, of course, that NMT project funding is ridiculously low compared to road- and parking-related infrastructure, coming in at the percentile level. Section 2 is hereby incorporated into the comments on the NMTMP.
- 6.3. While the consultants ITS have failed to compile a proper CITP, at least they have done a decent job in the NMT Master Plan.
- 6.4. The problem lies not so much in the details of the NMTMP, but in its narrow vision and low ambition. That can only be fixed, however, once the fundamental problems of the CITP and RMP have been addressed, which would make available much more funding also for NMT.
- 6.5. FSM recommends that the NMTMP be accepted for the moment, but that it be revisited once the fundamental flaws in the overall CITP strategy have been addressed with a view to a greatly expanded role not only for NMT but for all sustainable modes of transport.
- 6.6. NMT should of course be fully included in the planning for larger modal interchanges (stations, park-and-ride, secure NMT storage etc).

A Article in Eikestadnuus on subordinate role of RMP

Why the Roads Master Plan has no status in law

HC Eggers
16 October 2018

The draft Roads Master Plan (RMP) presented at the Mobility Forum in September complies with none of the legislation and should hence be withdrawn. At best, it can serve as partial input into a new Roads Sectoral Plan.

The reasons for this claim requires some legal context. South African legislation is hierarchically structured in two ways:

The first hierarchy pertains to the sphere of government: national, provincial and municipal (local) government. Theoretically district government also exists but it does not play a large role. National laws govern provincial ones, and both in turn govern municipal ones. The lowest level of the hierarchy are so-called Sectoral Plans.

The second hierarchy pertains to the type of law. Acts at the top of the hierarchy often result in subordinate Frameworks. Acts and Frameworks together govern Regulations, Policies and Plans, and all together determine so-called Standard Operating Procedures and implementation.

The hierarchical structure is crucial: instances higher up in the hierarchy are mandatory for those lower down. A low-level Plan which contradicts a high-level Act or Regulation thereby becomes unlawful.

Where, then, does the Roads Master Plan appear in the hierarchy? The diagram sets out the relevant legislation. At the peak, we have the Constitution. The main national acts, shown in green, are SPLUMA (Spatial Land Use and Management Act), MSA (Municipal Systems Act), NLTA (National Land Transport Act), NEMA (National Environmental Management Act) and NHRA (National Heritage Resources Act). Relevant on national level are also the NLTSF (National Land Transport Strategic Framework) and MR16 (Minimum Requirements for drawing up an integrated transport plan).

On provincial level, LUPA (Land Use Planning Act) and PSDF (Provincial Spatial Development Framework) shown in green are directly relevant because they are required by SPLUMA. Similarly, the PLTF (Provincial Land Transport Framework) is required by the national NLTA.

The chief planning instrument on local-government level is the IDP (Integrated Development Plan) as required by the national MSA. The key municipal spatial planning instrument is the MSDF (Municipal Spatial Development Framework). It is required and governed both by spatial planning (SPLUMA, LUPA, PSDF, LUPB) and by transport planning (NLTSF), and of course the IDP. On the transport side, the key municipal planning instrument is the Comprehensive Integrated Transport Plan (CITP); it is mandatory in terms of the NLTSF, and the MR16 sets out in detail the type of contents of a CITP.

No Roads Master Plan is even mentioned in this hierarchy. It therefore cannot exist on its own; it is either illegal or it must have an optional place within these hierarchies. There is no doubt that the only lawful place for an RMP is that of a Sectoral Plan at the lowest level of the hierarchy. It is governed by all of the higher legislation and should therefore be called a Roads Slave Plan.

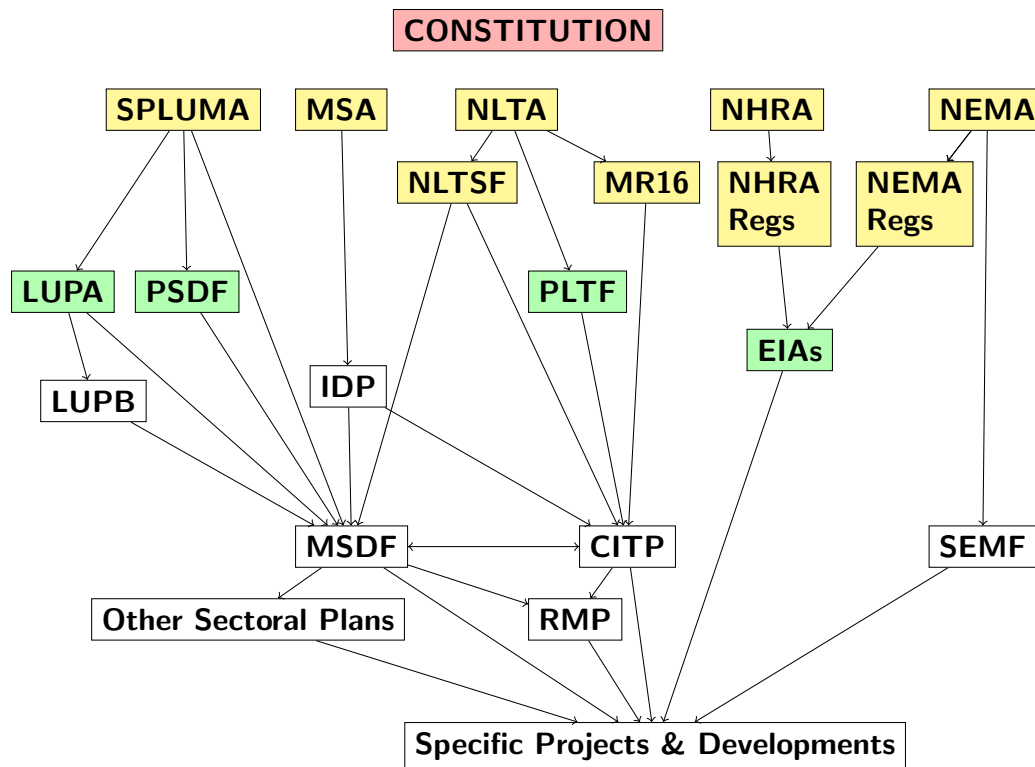
By contrast, the CITP is mandatory under the NLTA, and the MSDF is mandatory under multiple pieces of legislation. The principles and strategies of higher-order legislation, including the CITP and MSDF are binding on any RMP. The CITP and MSDF determine what a

RMP should contain and not vice versa. Naturally, funding priorities are also set not by the RMP itself.

Specific projects are at the very bottom of the hierarchy. Any and all new road construction must be considered within the parameters set by all of the above. A Roads Slave Plan has no freedom to pick and choose specific projects.

What type of projects does the legislation prefer? **The entire hierarchy of legislation is unambiguous that the future lies not in construction of more and wider roads but in densification and public transport.** By law, public transport and NMT must hence form the focus of the MSDF and CITP Project Teams and the Intergovernmental Steering Committees while road construction should be perpetually on the back burner. Any Roads Slave Plan should be an afterthought or not appear at all.

Traffic congestion by itself is not a valid ground for new road construction. All of the above legislation is well aware of congestion but nevertheless is unanimous and strident in requiring densification, public transport and NMT rather than road construction.



B Item 11.5.5 of Council Agenda, 28 April 2021

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11.5.5	REQUEST FOR APPROVAL OF THE COMPREHENSIVE INTEGRATED TRANSPORT PLAN
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Collaborator No: 702614
IDP KPA Ref No: Good Governance and Compliance
Meeting Date: 14 April 2021 and 28 April 2021

1. SUBJECT: REQUEST FOR APPROVAL OF THE COMPREHENSIVE INTEGRATED TRANSPORT PLAN

2. PURPOSE

That Council approves the 2019-2020 Update of the Comprehensive Integrated Transport Plan (CITP).

3. DELEGATED AUTHORITY

Municipal Council.

4. EXECUTIVE SUMMARY

The 2016 Comprehensive Integrated Transport Plan (CITP) is valid for a five year period, with annual updates each year and the full review every 5 years.

The draft 2019-2020 update of the CITP have highlighted important strategies and focuses on a common vision for transport.

The Municipality's transport vision and objectives were updated to ensure:

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

The draft 2019-2020 update of the CITP also takes into account the recently approved Spatial Development Framework (SDF), and proposes a more effective approach to improve transport (including freight), public transport and NMT (non-motorized transport).

5. RECOMMENDATIONS

- (a) that the content of this Comprehensive Integrated Transport Plan annual update be noted;
- (b) that Council notes that, for this update, targeted consultation was carried out, and for the (5 yearly) review of the 2016 CITP (to be undertaken during 2021), a full public participation process will be carried out; and
- (c) that the Draft 2019-2020 Comprehensive Integrated Transport Plan Update, attached as **ANNEXURE A**, be accepted.

6. DISCUSSION / CONTENTS**6.1 Background**

The Stellenbosch Municipality (SM) last Comprehensive Integrated Transport Plan (CITP) was approved by the Provincial Minister of Transport and Public Works in terms of section 36(4) of the National Land Transport Act (NLTA), Act 5 of 2009 in October 2018. The annual update of Stellenbosch's CITP, was carried out in accordance with the regulations published by the Minister dated 29 July 2016, Minimum Requirements (MR) for the Preparation of Integrated Transport Plans, 2016 no 881.

6.2 Discussion

The 2019-2020 update of the CITP makes provision for the recently approved Spatial Development Framework (SDF), including proposed housing developments. Detailed assessments of the current transport system was carried out, international case studies of similar university towns were undertaken and improvements to the transport system are recommended.

The following chapters were updated:

- Chapter 1: Introduction provides a brief overview of the project, the study area and the project methodology
- Chapter 2: Transport Vision and Objectives describes the position and policy statements guiding transport for Stellenbosch Municipality.
- Chapter 3: Transport Register summarises the various types of transport in Stellenbosch Municipality.
- Chapter 4: Spatial Development Framework provides an overview of the spatial structure and land use framework which will influence the transport for Stellenbosch Municipality.
- Chapter 5: Transport Needs Assessment discusses the transport needs identified for the area.
- Chapter 6: Public Transport Plan describes the components identified to improve public transport for the municipality.
- Chapter 7: Transport Infrastructure Strategy summarises the strategy to improve transport infrastructure for various modes of transport.
- Chapter 8: Travel Demand Strategy provides an overview of the interventions to manage the travel demand better towards more sustainable transport.
- Chapter 9: Non-Motorised Transport summarises the strategies and plans toward more sustainable modes of walking and cycling.
- Chapter 10: Freight Transport Strategy summarises the goods and hazardous substances networks as other strategies to support effective freight movement.
- Chapter 11: Other Transport Related Strategies summarises the improvements proposed for other transport including public transport safety and security, road user safety, law enforcement, tourism and accessible transport.
- Chapter 12: Funding Strategy and Summary of Programmes provides a description of the extent of funding, funding sources as well as the list of programmes per transport sector strategy.
- Chapter 13: Stakeholder Consultation describes the extent of participation and consultation that was undertaken to prepare the CITP update.

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In addition, the following aspects were earmarked as focus areas:

- Public Transport including MBT, bus and rail as well as local and inter-municipal commuter services.
- Public transport such as long distance or cross-border, transport for learners, meter-taxis or other e-hailing services.
- NMT (walking and cycling) as a more sustainable mode of transport.
- Improvements to infrastructure networks and services which supports the movement of its people and goods, as part of a vibrant economy.

6.3 Financial Implications

Cost estimates are carried out once a proposal is identified for further assessment or implementation. The cost estimates / funding analysis will determine the financial implications and the most appropriate funding source / model will be selected. The implementation of proposals may be phased to coincide with available funding. Examples of sources of funding are: Municipal Capital Funding, Development Contributions, Provincial Roads Authority and Infrastructure Grants.

6.4 Legal Implications

The recommendations in this report comply with Council's policies and all applicable legislation. The minimum requirements for Integrated Transport Plans were published on 30 November 2007 in the Government Notice No 1119. The MEC Transport and Public Works, has recommended that the Stellenbosch Municipality be classified as a Type 1 Planning Authority based on classification criteria contained in the Government Notice. The Municipality is therefore required to compile a CIP every 5 years and update the CIP annually. The CIP and its annual updates must be submitted to the MEC for approval.

6.5 Staff Implications

This report has no staff implications to the Municipality.

6.6 Previous / Relevant Council Resolutions

Previous CIP's and annual updates had been approved by Council, as well as the Transport MEC.

6.7 Risk Implications

This report has no risk implications for the Municipality.

**RECOMMENDATIONS FROM INFRASTRUCTURE SERVICES COMMITTEE MEETING TO
THE EXECUTIVE MAYOR: 2021-03-04: ITEM 5.1.3**

- (a) that the content of this Comprehensive Integrated Transport Plan annual update be noted;
- (b) that Council notes that, for this update, targeted consultation was carried out, and for the (5 yearly) review of the 2016 CIP (to be undertaken during 2021), a full public participation process will be carried out; and
- (c) that the Draft 2019-2020 Comprehensive Integrated Transport Plan Update, attached as **ANNEXURE A**, be accepted.

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**RECOMMENDATIONS FROM THE EXECUTIVE MAYOR, IN CONSULTATION WITH THE
EXECUTIVE MAYORAL COMMITTEE, TO COUNCIL: 2021-04-14: ITEM 7.5.5**

- (a) that the content of this Comprehensive Integrated Transport Plan (CITP) annual update be noted;
- (b) that Council notes that, for this update, targeted consultation was carried out, and for the (5 yearly) review of the 2016 CITP (to be undertaken during 2021), a full public participation process will be carried out; and
- (c) that the Draft 2019-2020 Comprehensive Integrated Transport Plan Update, attached as **ANNEXURE A**, be accepted.

ANNEXURES

Annexure A: Draft CITP UPDATE 2020

FOR FURTHER DETAILS CONTACT:

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REPORT DATE	15 February 2021

C Section 11(1)(c) of the National Land Transport Act

11(1)(c) The **municipal sphere of government is responsible for** —

- (i) developing land transport policy and strategy within its area based on national and provincial guidelines, which includes its vision for the area and incorporates **spatial development policies** on matters such as **densification** and infilling as well as **development corridors**;
- (ii) promulgating municipal by-laws and concluding agreements, as appropriate, in the municipal sphere;
- (iii) ensuring co-ordination between departments and agencies in the municipal sphere with responsibilities that impact on transport and land use planning issues, and bringing together the relevant officials;
- (iv) in its capacity as planning authority, **preparing transport plans** for its area, **ensuring the implementation thereof** and **monitoring its performance** in achieving its goals and objectives;
- (v) **financial planning** with regard to land transport within or affecting its area, with particular reference to transport planning, infrastructure, operations, services, maintenance, monitoring and administration, with due focus on rehabilitation and maintenance of infrastructure;
- (vi) managing the movement of persons and goods on land within its area by co-ordinating such movement;
- (vii) encouraging and promoting the optimal use of the available travel modes so as to enhance the effectiveness of the transport system and reduce travelling time and costs;
- (viii) developing, implementing and monitoring a strategy to prevent, minimise or reduce any adverse impacts of the land transport system on the environment in its area;
- (ix) developing, operating and maintaining a land transport information system for its area;
- (x) encouraging, promoting and facilitating public consultation and participation in the planning, regulation and implementation of public transport, and applying the requirements of the Systems Act in that regard;
- (xi) **marketing and promoting public transport** and promoting publicity associated with the public transport system;
- (xii) providing information to users or potential users of public transport;
- (xiii) promoting safety and security in public transport;
- (xiv) ensuring there is provision for the needs of special categories of passengers in planning and providing public transport infrastructure, facilities and services to meet their needs, in so far as possible by the system provided for mainstream public transport;
- (xv) liaising on a continuous basis with the South African Police Service, Road Traffic Management Corporation, the relevant provincial and municipal law enforcement authorities or agencies, and the inspectors appointed under the Cross-Border Act, with a view to ensuring co-ordinated transport law enforcement within its area;
- (xvi) applying **traffic management techniques** aimed at improving road traffic movement;
- (xvii) undertaking functions relating to **municipal roads**, as well as measures to limit damage to the road system;

- (xviii) the **planning, implementation and management of modally integrated public transport networks and travel corridors for transport** within the municipal area and liaising in that regard with neighbouring municipalities;
- (xix) in relation to the planning functions contemplated in paragraph (iv) include **service level planning for passenger rail on a corridor network basis** in consultation with the South African Rail Commuter Corporation;
- (xx) introducing, establishing or assisting in or encouraging and facilitating the establishment of integrated ticketing systems, the managing thereof including through-ticketing and determining measures for the regulation and control of revenue-sharing among operators involved in those systems;
- (xxi) subject to standards set by the Minister under section 5(5), if any, set standards for interoperability between fare collection and ticketing systems in its area;
- (xxii) formulating and apply **travel demand management measures** for its area;
- (xxiii) in the case of gross cost contracts for subsidised services, determining fare structures and fare levels and periodically adjusting fares after publishing the proposed adjustment for public comment;
- (xxiv) determining concessionary fares for special categories of passengers in the prescribed manner;
- (xxv) exercising control over service delivery through —
 - (i) the setting of operational and technical standards and monitoring compliance therewith; and
 - (ii) the monitoring of contracts and concessions;
- (xxvi) concluding subsidised service contracts, commercial service contracts, and negotiated contracts contemplated in section 41(1) with operators for services within their areas;
- (xxvii) developing and managing intelligent transport systems for their areas in the prescribed manner; and
- (xxviii) performing the other functions of municipalities in terms of this Act.

D An annotated guide to contents and compliance of the 2021 “CITP”

- D1. The draft presented **and accepted by Council** is sloppy and incomplete. The photographs and figures which precede the title page should have been incorporated into the main body of the document itself. Crucial information such as the maps of proposed developments are missing. The 2021 “CITP” as accepted has empty pages instead of maps in Figure 4.4 (purportedly a *Map of Development Proposals Stellenbosch Municipality*), Figure 4.5 (proposals grouped by area), 4.6 (proposals in Klapmuts), 4.7 (in Franchhoek (sic)), 4.8 in Pniel. No information is provided as to the status of these purported proposals.
- D2. **Public Transport:**
- D3. Progress on taxi ranks is reported. That was easy.
- D4. The 2021 “CITP” reports no progress on other public transport at all but instead only offers the excuse that *Adequate funding to realise transport projects listed in the ITP is always a concern. Typically the lack of progress on transport projects listed in the previous ITPs can be specifically attributed to this factor* (Agenda page 871). This is in stark contrast to the billions which apparently are being considered realistic for road construction; see Section 2.
- D5. The 2021 “CITP” “review of the nature of key transport elements for other university towns” (Section 2.2) amounts to nothing but a few photographs and maps. No Stellenbosch-relevant or Stellenbosch-specific lessons are drawn and no resulting actions are proposed. As it stands, these figures and maps are just padding.
- D6. *Vision Transport Elements* (Section 2.1) immediately goes to roads. No mention is made of the actual 2016 CITP Vision and its implications. The 2021 “CITP” thereby contradicts the Vision and Objectives of the 2016 CITP.
- D7. Regarding the *Public Transport Plan* which in the MR16 occupies a central role, the 2021 “CITP” just expresses some hope for progress in the far future but reports no progress in the past or hope for the near future; see e.g. Page 827. In other words, the section on *Public Transport Plans* in the 2021 “CITP” offers nothing new.
- D8. The 2021 “CITP” offers an adequate assessment on NMT, which is hardly surprising since the same consultant wrote both the NMTMP and the 2021 “CITP”, but budget spending is minimal.
- D9. Section 3.6 on Minibus Taxis comes nearer to being an actual update. At least here newer data on a 2019 Ranks Survey is included and some route change and consolidation is proposed. However, compared to the major reorganisation and needs of public transport, these improvements are minimal.
- D10. Section 3.7 entitled *Commuter Bus* contains a trivial update.
- D11. Section 3.8 on *Rail* has nothing new: the rail line maps had already been contained in the 2016 CITP. The table on p854 of “current fares” shown in the 2021 “CITP” is six years old and is a copy of the identical table appearing on page 48 of the 2016 CITP. The table on p855 on “boarding and alighting passengers” is nine years out of date.
- D12. Section 3.9 Long-distance and cross-border transport: This section consists of padding, trivialities and plagiarised figures. The information provided is not new. Greyhound has ceased operating. Figure 3.7 of the 2021 “CITP” is an exact copy of the same Figure 3-33 of the 2016 CITP. Likewise, Fig 3.8 of the 2021 “CITP” is an exact copy of Fig 3-34 of the 2021 CITP.

- D13. Section 3.10 Non-Motorised Transport: Given that ITS also compiled the NMT Master Plan, this section provides an acceptable update. Little to no information is, however, provided on the *progress made in the NMT sector* in the five years since detailed proposals were made in the 2016 CITP’s Section 11.1.
- D14. Section 3.11 on “Health Transport Services” is new but hardly important in the bigger context.
- D15. Section 3.12 is trivial.
- D16. In stark contrast to the triviality or minimal new information of the previous sections, Sections 3.13 to 3.19 regarding *Roads and Traffic* are long, detailed and uses fairly recent data. Most of that is derived from the RMP.
- What is called an “Update” on Roads and Traffic in the 2021 “CITP” comprises ten pages with an entirely new emphasis on roads compared to the 2016 CITP. The 2016 CITP had merely mentioned three alternatives for two or three road routes which should be investigated. Instead of limiting itself to those two routes, the 2021 “CITP” has taken it upon itself to include a list of 84 road-related projects, taken directly from the RMP, of which most have no mention in the 2016 CITP or relevance within its overall strategy.
- D17. **As measured by its Sections 3.13–3.18 on Roads and Traffic and its Sections 7.1 and 7.2 on “Transport Infrastructure Strategy”, the 2021 “CITP” is therefore not an update but an entirely new document.**
- D18. **The complete departure from the 2016 CITP is even more obvious in Section 12.1 (“Funding Requirements”) which is dealt with in Section 2. The wholesale incorporation of a list of eighty four (84) specific roads projects into the funding requirements constitutes a wholesale departure from the MR16 requirements and the principles and specifics of the 2016 CITP.a**
- D19. The mention on Page 874 of “Donations” as source of funding raises an important question: How much funding exactly has during the past five years been contributed by private *development contributions* towards road infrastructure? How much exactly has been “donated” in the past five years by private entities towards road building? By whom, exactly?
- D20. Section 5 of the 2021 “CITP” is new and appropriate in that it reflects the results of 2019 public participation. Remarkably, the needs expressed by the public have very little in common with the Roads Master Plan but on the contrary express the urgent need for public transport and NMT. Like the RMP, the 2021 “CITP” fails to make any use of this information.
- D21. The 2021 “CITP”’s Sections 6.1 to 6.3 (the purported “Public Transport Plan”) offer nothing new except excuses why nothing has been done and vague proposals without any costing or timeframes.
- D22. Section 6.4 (Operating Licences Plan) is relevant and a valid update.
- D23. The 2021 “CITP”’s Section 7 *Transport Infrastructure Strategy* shows the extreme bias towards road projects and road building. Section 7.2 contains a three-page very long and very detailed list of road projects, taken of course from the RMP, while the corresponding list of projects in Section 7.3 (*Public Transport Infrastructure* consists of just seven items. All seven are related directly to minibus taxis and taxi ranks.

- D24. **In other words, the 2021 “CITP” proposes exactly zero projects for public transport outside of minibuses. This represents the exact opposite of the legislation, the MSDF and the 2016 CITP.**
- D25. The same disregard is continued in the 2021 “CITP”’s Section 8 (*Travel Demand Strategy*), which is a pathetic 1.5 page collection of generalities with no specifics. The 2016 CITP’s Section 9 already contained detailed proposals, strategies, recommendations and proposals over ten pages. None of that is even mentioned in the 2021 “CITP”, and it is easy to see why: There has been no progress to report and no proposed projects or funding for TDM in the last five years. The 2021 “CITP” not only fails to describe this failure in implementation, but itself has nothing to offer to improve this situation.
- D26. As already mentioned, the NMT part of the 2021 “CITP” (Section 9) is based on the separate NMT Master Plan and looks acceptable. However, the amounts budgeted for NMT are minuscule compared to those being requested for road-related projects (less than one percent for planning and construction). Also, many of the listed projects are nothing more than sidewalks which are now routinely built when new roads are constructed. See Section ***.
- D27. The key to the entire 2021 “CITP” lies in its Section 12, *Funding Strategy and Summary of Programmes*. This is dealt with at length in Section 2.
- D28. Figure 4.1 of the 2021 “CITP” is incorrect and misleading and out of date since it dates back to 2013. The 2019 MSDF Figure 24 (*Consolidated Concept of development*) should have been used instead. **In using the incorrect key spatial plan in its Figure 4.1, the 2021 “CITP” is misleading and not compliant with the MSDF.**
- D29. A CITP should in any case be governed by the MSDF overall concept, not by some communication by the Department of Planning and not by individual development proposals whose status and compatibility is unknown at best. Table 4.1 roughly corresponds to the 2019 MSDF, but Table 4.2 has no traceable ancestry in the MSDF. Likewise, Table 4.3 (Proposed industrial and commercial developments) has no place in the CITP unless it first appears in the MSDF.
- D30. Section 4.4 of the 2021 “CITP” *Current and Proposed Trips* and Table 4.5 likewise have no relationship to the MSDF itself. They are taken not from the MSDF but from the Roads Master Plan, which has no status in law and cannot be used in this context or to claim that it represents the MSDF.

E NLTA Minimum Requirements 2016

4 No. 40174

GOVERNMENT GAZETTE, 29 JULY 2016

GOVERNMENT NOTICES • GOEWERMENTSKENNISGEWINGS

DEPARTMENT OF TRANSPORT

NO. 881

29 JULY 2016

NATIONAL LAND TRANSPORT ACT, 2009 (ACT NO. 5 OF 2009)

MINIMUM REQUIREMENTS FOR THE PREPARATION OF INTEGRATED TRANSPORT PLANS, 2016

I, Elizabeth Dipuo Peters, the Minister of Transport hereby, in consultation with the MECs, publish the Minimum Requirements in the Schedule in terms of section 8(1)(q), (r) and (s) and section 36(1) and (2) of the National Land Transport Act, 2009 (Act No. 5 of 2009).



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Elizabeth Dipuo Peters

Minister of Transport

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MEC relates only to matters listed in section 36(4) of the Act, such as procedures and financial issues that affect the province. ITPs must be submitted to the Minister for approval of the rail component where there is one. All ITPs must be made available to the National Public Transport Regulator (NPTDR) and the relevant Provincial Regulatory Entity (PRE) by planning authorities and they must make recommendations to them relevant to applications for new operating licences. In the case of LITPs, they will be submitted to the MEC as part of the relevant DITP and not separately. In addition, these transport plans also need to become part of the integrated development plans (IDPs) of the applicable metropolitan, district and local municipalities as required by section 31 of the Act.

LITPs will thus be included in a summarised format by the district municipalities in their transport plans, and will also serve as input into the IDPs of the applicable local municipality and district municipality.

5. FREQUENCY OF PLAN PREPARATION AND UPDATE

ITPs are prepared for a five-year period, thus a new ITP must be prepared every five years. On an annual basis, updating of selected aspects must be carried out.

The minimum frequency of plan preparation and updating is shown in Table 1.

TABLE 1: MINIMUM FREQUENCY OF PLAN PREPARATION AND UPDATE

PLAN	FREQUENCY		COMMENTS
	PREPARATION	UPDATE	
1. Comprehensive ITP (CITP) and District ITP (DITP)	Total overhaul every 5 th year	Annual update of selected aspects, in synchronisation with IDP	Update to focus on action programme and budget. Prerogative of PA to do more comprehensive update
2. Local Integrated Transport Plan (LITP)	Prepare every five years, as input to new DITP in the case of local authorities that fall within a district municipality	Update the budget and programme for the following year annually, in synchronisation with IDP	
3. Transport Register (forms part of ITP)	Total overhaul every 5 th year	Update the TR if any significant new data collection occurs. GIS, databases and information systems to be updated on an ongoing basis as and when new information is collected	Update to concentrate on gaps and information of poor quality
4. Public Transport Plan (forms part of ITP)	Total overhaul every 5 th year	Report annually on contracts that have been awarded or which have expired and any changes or additions to the proposed contracted services network. Database of operating licences should be updated on an ongoing basis as OLs are awarded, lapse, or are renewed.	

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5.1 Overhauling the plan

The overhauling of a plan every fifth year means that every aspect of the plan must be re-examined to see if it is still up to date, revised and updated where necessary, and relevant new aspects must be added. A new Transport Register must be prepared every five years, ahead of the new five-year ITP, and this needs to be reflected in Chapter 3 of the new ITP. Revisions to the municipality's Spatial Development Framework must be reflected. Stakeholder engagement must be carried out, and the needs assessment updated accordingly.

The Public Transport Plan must be revised to plan for any new contracts that will be issued over the next five years and to reflect the sequencing of any proposed restructuring of the network. The new ITP should reflect progress made in the previous five years with the implementation of the various strategies and programmes, and update all strategies and programmes for the next five years. DITPs that reflect LITPs must be updated to summarise the new five-year LITPs of its constituent local municipalities.

The list of projects, programmes and budgets in Chapter 12 must be completely revised for the next five year period of the new plan, and a detailed budget and programme prepared for the following year.

5.1 Annual updates

On an annual basis, the ITP should be updated where necessary, and this may take the form of a supplementary annual report, rather than the issuing of a new ITP document each year.

The annual updating of the plan must at least involve the following:

- Update the TR if any significant new data collection occurs. The transportation GIS, databases and information systems must be updated on an ongoing basis as and when new information is collected.
- Describe progress with implementing the ITP in the previous year (e.g. new infrastructure built and contracts awarded).
- Document which contracts have been awarded or which have expired and any changes or additions to the proposed contracted services network. In municipalities that have prepared a CITP in particular, the annual plan submitted in support of the PTNG grant and other national funding must be documented.
- The database of operating licences, where a municipality has established such, should be updated on an ongoing basis as OLS are awarded, lapse, or are renewed. Any adjustments necessary to the Operating Licences Plan based on representations or new developments should be documented.
- Revising and updating the projects, programmes and budgets in Chapter 12, so that a three-year period ahead is maintained, along with a detailed programme and budget for the next financial year. The expected sources of revenue to fund the budget must be documented. This chapter will serve as the basis for the municipality's annual transport sector component of the Integrated Development Plan (IDP). The budget and programme for the following year contained in each LITP must also be updated by the local municipality concerned, in synchronisation with the preparation of the annual IDP.

F Original tables from Section 12 of the 2021 “CITP”

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12 FUNDING STRATEGY AND SUMMARY OF PROGRAMMES

12.1 Funding Requirements

Table 12.1 provides a summary of the total budgets estimated to be required for the full list of projects by the various project categories. Project values are shown in **millions of Rands**.

Table 12.1: Project Budget Totals per Category

Project Category	Project Budgets Per FY in Million Rands R'000 000					
	2020/21	2021/22	2022/23	2023/24	2024/25	Total
Integrated Planning	R4.00	R3.80	R5.60	R22.60	R1.70	R37.70
Public Transport	R36.80	R15.25	R27.00	R18.50	R7.50	R105.05
NMT (Walk/Cycle)						R126.30
Road Infrastructure	R25.31	R244.40	R242.40	R758.20	R112.10	R1 382.41
TOTALS (Millions Rands)	R66.11	R263.45	R275.00	R799.30	R121.30	R1 525.16

Note project costs are in Million Rands.

Table 12.2, Table 12.3, Table 12.4 and Table 12.5 summarises the list of projects for SM by type of project category. The list of projects has been sub-divided into the following categories:

- Integrated Planning Projects
- Public Transport Projects
- NMT/Walking and Cycling Projects
- Roads Infrastructure Projects

Projects have been assigned over the next five financial years:

- Years 1 – FY 2020/21
- Year 2 – FY 2021/22
- Year 3 - FY 2022/23
- Year 4 – FY 2023/24
- Year 5 - FY 2024/25.

It also gives an indication of the stage of the projects

- Planning
- Design
- Construction

The priority of projects have also been indicated.

- High – first 1-2 years
- Medium 3-5 years
- Low – beyond 5 years

In addition an indication has been given as to its contribution to the various strategic focus areas listed in the IDP:

- Valley of Possibility
- Green and Sustainable
- Safe Valley
- Dignified Living
- Good Governance and Compliance

The proposed Priority NMT linkages cover 28km and their implementation costs are estimated at approximately R126 million. The list of NMT projects have been costed but not year of implementation allocated yet. Thus for now, only the total budgets for NMT are reflected and not the budgets by financial year.

The project numbering from the Roads Masterplan projects have been carried through.

Also note, that some of the Roads Projects that are still in early planning stages, costs have not been provided for these.

Table 12.2: List of Infrastructure Transport Planning Projects

Project No.	Projects	Financial Year					Type	Funding Source	Strategic Focus Areas					Priority
		Project Budget (Million Rands)							Valley of Possibility	Green and Sustainable	Safe Valley	Dignified Living	Good Governance	
		2020/21	2021/22	2022/23	2023/24	2024/25								
1	Comprehensive Transport Plan (CITP)	R1.00	R1.10	R1.40	R1.30	R1.10	Planning	SM/WCG	✓	✓	✓	✓	✓	High
a	Overview	R0.30	R0.30	R0.30	R0.30	R0.30	Planning	SM/WCG	✓	✓	✓	✓	✓	High
b	Public Transport Strategy	R0.70			R0.30		Planning	SM/WCG	✓	✓	✓	✓	✓	High
c	Transport Demand Management (TDM) Strategy			R0.50			Planning	SM/WCG	✓	✓	✓	✓	✓	High
d	Freight Strategy		R0.60				Planning	SM/WCG	✓	✓	✓	✓	✓	High
e	Law Enforcement Strategy		R0.20				Planning	SM	✓	✓	✓	✓	✓	High
f	Operating Licensing Plan Review (OLP)			R0.30		R0.30	Planning	SM/WCG	✓	✓	✓	✓	✓	High
g	NMT Strategy			R0.30			Planning	SM/WCG	✓	✓	✓	✓	✓	High
h	Universal Access Strategy				R0.70		Planning	SM	✓	✓	✓	✓	✓	High
2	Update Traffic Model						Planning	SM	✓	✓	✓	✓	✓	High
3	Parking and loading standards guidelines						Planning	SM	✓	✓	✓	✓	✓	High
4	Park and Ride Feasibility Study		R0.60				Planning	SM	✓	✓	✓	✓	✓	High
5	Road Transport Safety Master Plan			R0.70			Planning	SM	✓	✓	✓	✓	✓	High
6	Traffic Calming Master Plan			R0.70			Planning	SM	✓	✓	✓	✓	✓	High
7	New Development Transport Analysis						Planning	SM	✓	✓	✓	✓	✓	High
8	Du Toit Street Relocation						Planning	SM	✓	✓	✓	✓	✓	TBC
9	Adam Tas Corridor						Planning	SM	✓	✓	✓	✓	✓	TBC
10	Parking Development	R1.00	R1.00				Planning	SM	✓	✓	✓	✓	✓	High
11	Traffic Signal Optimization Programme						Planning	SM	✓	✓	✓	✓	✓	TBC
12	Kayamandi Extension Transport Network Plan						Planning	SM	✓	✓	✓	✓	✓	TBC
13	Klapmuts Transport Network Plan						Planning	SM	✓	✓	✓	✓	✓	TBC
14	Ben du Toit Extension: Trumali Street / Paradyskloof Road			R0.50	R20		Planning	SM	✓	✓	✓	✓	✓	Medium
15	Jamestown South Transport Network	R1.00					Planning	SM	✓	✓	✓	✓	✓	High
16	Botmanskop Transport Network						Planning	SM	✓	✓	✓	✓	✓	TBC
17	Droedyke Transport Network						Planning	SM	✓	✓	✓	✓	✓	TBC
TOTAL (Rands Per Million)		R4.00	R3.80	R5.60	R22.60	R1.70								

Table 12.3: List of Public Transport Projects

Project No.	Projects	Financial Year					Type	Funding Source	Strategic Focus Areas					Priority
		Project Budget (Million Rands)							Valley of Possibility	Green and Sustainable	Safe Valley	Dignified Living	Good Governance and Compliance	
		2020/21	2021/22	2022/23	2023/24	2024/25								
1	Kayamandi Taxi Rank	R13.00					Construction	SM	✓	✓	✓	✓	✓	High
2	Franchhoek Taxi Rank - Phase 2	R12.00					Construction	SM	✓	✓	✓	✓	✓	High
3	Klapmuts Taxi Rank - Phase 2	R10.00					Construction	SM	✓	✓	✓	✓	✓	High
4	Long distance MBT Rank - Kayamandi		R0.25	R2.00	R6.50	R6.50	Planning, Design and Construction	SM	✓	✓	✓	✓	✓	High
5	MBT Shelters	R0.30	R1.00	R1.00	R1.00	R1.00	Planning, Design and Construction	SM	✓	✓	✓	✓	✓	High
6	Bergzicht Rank Upgrades			R10.00			Planning, Design and Construction	SM	✓	✓	✓	✓	✓	High
7	Pound upgrade/ infrastructure		R3.00	R2.00			Planning, Design and Construction	WCG	✓	✓	✓	✓	✓	TBC
8	Public Transport system Feasibility Study	R1.00	R1.00				Planning	SM, Net	✓	✓	✓	✓	✓	High
9	Business Model and Operator Liaison			R1.00	R1.00		Planning	SM, Net	✓	✓	✓	✓	✓	High
10	Short-Term Interventions	R0.50	R5.00	R5.00			Planning, Design and Construction	SM, WCG	✓	✓	✓	✓	✓	High
11	Feasibility of a Transport Operating Company		R2.00				Planning and Investigation	SM	✓	✓	✓	✓	✓	High
12	Public Transport Policy		R1.00				Planning and Investigation	SM	✓	✓	✓	✓	✓	High
13	Re-design of Bergzicht Public Transport Facility		R1.00	R5.00			Planning, Design and Construction	SM	✓	✓	✓	✓	✓	High
14	Tour Bus Parking Stellenbosch/Franschoek		R1.00	R1.00	R10.00		Planning	SM	✓	✓	✓	✓	✓	High
TOTAL (Rands Per Million)		R36.80	R15.25	R27.00	R18.50	R7.50			✓	✓	✓	✓	✓	High

Table 12.4: List of NMT (Walking and Cycling) Projects

Project No.	Projects	Total project costs incl fees	Financial Year					Type	Funding Source	Strategic Focus Areas					Priority
			2020/21	2021/22	2022/23	2023/24	2024/25			Valley of Sustainability	Green and Sustainable	Life Valley	Dignified Living	Good Governance	
1	Pedestrianisation of Church St and Andringa St	R0.49						Planning, Design and Construction	SM	✓	✓	✓	✓		High
2	Re-cluttering of street furniture in Stellenbosch CBD and dropped kerb standardisation	R5.00						Planning, Design and Construction	SM	✓	✓	✓	✓		Medium
3	Roll-out of bicycle network in Stellenbosch CBD (Continuity of cycle routes, road markings, bi-directional cycling in one way streets, bicycle parking)	R4.40						Planning, Design and Construction	SM	✓	✓	✓	✓		High
4	Pedestrian bridge across R304 & rail line linking Kayamandi and Cloetesville	R20.00						Planning, Design and Construction	SM	✓	✓	✓	✓		High
5	Kayamandi Rand St: Pedestrian priority, restrict heavy vehicle access, narrow road to 6.5m (from ~9m wide black top), raised ped crossing; Brick pave 4m wide NMT route up to to railway crossing	R0.61						Planning, Design and Construction	SM	✓	✓	✓	✓		High
6	Kayamandi: Safe ped link across railway line at Du Toit Station (grade separated crossing: either pedestrian bridge or crossing as part of Kayamandi mall upgrade)	R8.42						Planning, Design and Construction	SM	✓	✓	✓	✓		High
7	Kayamandi: Staircases parallel to Rand Rd north-east of stadium	R1.83						Planning, Design and Construction	SM	✓	✓	✓	✓		High
8	Kayamandi: Staircases west of stadium and 3m wide footpath up to Rand St (market area)	R2.14						Planning, Design and Construction	SM	✓	✓	✓	✓		High
9	Pedestrian bridge across Helshoogte Rd (R310) at Simonsberg St to provide safe crossing for scholars	R8.42						Planning, Design and Construction	SM	✓	✓	✓	✓		High
10	Bosman St: Extend effective sidewalk width and provide bi-directional cycle lane (Phase 1 between Banhoek and Merriman, Phase 2 Merriman and Van Riebeeck)	R0.99						Planning, Design and Construction	SM	✓	✓	✓	✓		High
11	Soetewijde St: Restrict access to local traffic only and provide safe pedestrian space	R0.95						Planning, Design and Construction	SM/ WCG	✓	✓	✓	✓		Medium
12	Merriman Ave: Investigation into ped crossing to mitigate current safety concerns	R0.62						Planning, Design and Construction	SM/ WCG	✓	✓	✓	✓		High
13	Merriman Ave: Extension of existing cycle lane up to Adam Tas	R0.10						Planning, Design and Construction	SM	✓	✓	✓	✓		Medium
14	Die Laan: Extend effective sidewalk width and provide bi-directional cycle lane	R0.49						Planning, Design and Construction	SM	✓	✓	✓	✓		High
15	R44: Provide 3m wide footpath on western side of the R44 (from Lang Rd to Welegevonden)	R8.00						Planning, Design and Construction	SM/ WCG	✓	✓	✓	✓		Medium
16	R44: Provide footpath (Extension of Ortel Rd in Cloetesville to the east) and bridge over R44	R9.29						Planning, Design and Construction	SM/ WCG	✓	✓	✓	✓		High

Project No.	Projects	Total project costs incl fees	Financial Year					Type	Funding Source	Strategic Focus Areas					Priority
			Project Budget (Million Rands)							Valley of Sustainability	Green and Sustainable	Free Valley	Dignified Living	Good Governance	
			2020/21	2021/22	2022/23	2023/24	2024/25								
17	Curry Rd: Extend sidewalk space on eastern side by 1) widening existing sidewalk and by 2) reducing drop-off area by installing delineated kerb	R0.85						Planning, Design and Construction	SM	✓	✓			High	
18	Bloekom St: Improved traffic calming in front of school and extend existing sidewalk	R0.56						Planning, Design and Construction	SM	✓	✓			High	
19	Extend Bicycle Lane from Cluver Rd along Rustenberg Rd and Cluver Rd: Provide smooth transition of bicycle lane onto sidewalk space on both sides of the road, widen sidewalk to convert into Bicycle Class 2	R1.00						Planning, Design and Construction	SM	✓	✓			Medium	
20	Upgrade NMT route through Eikestad Mall outside parking area; investigate re-arrangement of parking	R0.21						Planning, Design and Construction	SM	✓	✓			High	
21	Upgrade NMT route through Eikestad Mall outside parking area; investigate re-arrangement of parking	R0.42						Planning, Design and Construction	SM	✓	✓			Medium	
22	Aan die Wagenweg: Upgrade of bicycle path and sidewalk space	R0.89						Planning, Design and Construction	SM	✓	✓			Medium	
23	Van Rheeде/ R44 Intersection: Improve pedestrian safety	R2.20						Planning, Design and Construction	SM	✓	✓			High	
24	R44: Provide footpath on eastern side of the R44 (from Doornbosch to Dorp) incl. ped bridge over Eerste River	R10.31						Planning, Design and Construction	SM	✓	✓			Medium	
25	R44: Upgrade footpath on eastern side of the R44 (from Paradyskloof to Doornbosch)	R1.22						Planning, Design and Construction	SM	✓	✓			High	
26	Merriman Ave: Proposed shared footpath on southern side of the road (from Cluver to Simonsberg)	R1.05						Planning, Design and Construction	SM	✓	✓			Medium	
27	Simonsberg Rd: Provide shared facility & implementation of traffic calming measures	R1.22						Planning, Design and Construction	SM	✓	✓			High	
28	Martinson Rd: Narrowing of road with a separate two-way bicycle facility (4m wide Class 3) on southern side between Omega Rd and Simonsberg Rd; incl. gateways and sidewalk on northern side	R2.72						Planning, Design and Construction	SM	✓	✓			Medium	
29	Jonkershoek Rd: Upgrade of shared footpath (widen and resurface southside path where space allows) and provide lighting	R4.87						Planning, Design and Construction	SM/ WCG	✓	✓			Medium	
30	Bird St/ Adam Tas (R44) Intersection: Improve pedestrian safety	R1.65						Planning, Design and Construction	SM/ WCG	✓	✓			High	
31	Strand St. R44/ Dorp St Intersection: Improve pedestrian safety	R1.65						Planning, Design and Construction	SM/ WCG	✓	✓			High	
32	Adam Tas (R301)/ Dorp St Intersection: Improve pedestrian safety	R1.65						Planning, Design and Construction	SM/ WCG	✓	✓			Medium	

Project No.	Projects	Total project costs incl fees	Financial Year					Type	Funding Source	Strategic Focus Areas					Priority
			Project Budget (Million Rands)							Valley of Sustainability	Green and Sustainable	Life Valley	Dignified Living	Good Governance	
			2020/21	2021/22	2022/23	2023/24	2024/25								
33	Jamestown Webberville Rd: Provide 3m wide shared facility on northern side	R4.65						Planning, Design and Construction	SM		✓	✓		Medium	
34	Jamestown Drakensberg Rd: Provide shared NMT Facility	R0.55						Planning, Design and Construction	SM		✓	✓		Medium	
35	Koelenhof: Investigation into safe ped crossing at railway line	R0.08						Planning	SM		✓	✓	✓	High	
36	Kylemore Swart Rd: Extend existing sidewalk up to Helshoogte Road	R0.12						Planning, Design and Construction	SM		✓	✓	✓	High	
37	Kylemore Gousblom St: Widen pedestrian space at school entrance	R0.15						Planning, Design and Construction	SM		✓	✓	✓	High	
38	Kylemore Petunia St: Widen existing sidewalk on southern side, potentially convert into one-way street	R0.16						Planning, Design and Construction	SM		✓	✓	✓	High	
39	Lanquedoc: Provide shared NMT facility as part of Class 2 as part of the Upgrading of the Lanquedoc Access Road (SRMP078)	R0.00						Planning, Design and Construction	SM		✓	✓	✓	High	
40	Klapmuts: Shared NMT path along Klapmuts River (off-road)	R1.84						Planning, Design and Construction	SM		✓	✓	✓	High	
41	Klapmuts Adams St: Widen existing sidewalk on western side	R0.43						Planning, Design and Construction	SM		✓	✓	✓	Medium	
42	Klapmuts Alexander St: Widen existing sidewalk and traffic calming measures	R0.83						Planning, Design and Construction	SM		✓	✓	✓	Medium	
43	Klapmuts Merchant St: Widen existing sidewalk on eastern side (use full effective width) and convert into shared NMT facility	R0.75						Planning, Design and Construction	SM		✓	✓	✓	Medium	
44	Groendal Upper Lea Smit Rd: Upgrade sidewalks and introduce traffic calming	R1.07						Planning, Design and Construction	SM		✓	✓	✓	High	
45	Groendal Stiebeul River: Provide shared NMT facility along river on western side from existing NMT path to Dalubuhle school	R1.84						Planning, Design and Construction	SM		✓	✓	✓	Medium	
46	Groendal Jafthas St: Sidewalk along Jafthas St from Boonzaaler to Groendal High School (including ped crossing)	R0.40						Planning, Design and Construction	SM		✓	✓	✓	Medium	
47	Groendal Davids St: Extend sidewalk by means of delineated kerb	R1.01						Planning, Design and Construction	SM		✓	✓	✓	Medium	
48	Groendal: Provide staircase and NMT route from higher lying informal area down to Dalubuhle Primary School	R1.93						Planning, Design and Construction	SM		✓	✓	✓	Medium	

Project No.	Projects	Total project costs incl fees	Financial Year					Type	Funding Source	Strategic Focus Areas					Priority
			Project Budget (Million Rands)												
			2020/21	2021/22	2022/23	2023/24	2024/25			Valley of Sustainability	Green and Sustainable	Safe Valley	Planned Living	Good Governance	
49	La Motte Robertsvei Rd: Provide 3m wide shared facility on western side of Robertsvei Rd (to be included in SRMP033)	R2.94						Planning, Design and Construction	SM		✓	✓		Medium	
50	La Motte Main Rd: Provide pedestrian crossing	R0.02						Planning, Design and Construction	SM		✓	✓		Medium	
51	Franschhoek Main Road (R45): Upgrade existing pedestrian crossing points	R0.16						Planning, Design and Construction	SM		✓	✓	✓	Medium	
52	Wemmershoek: Rail crossing - Formalise path to PT stop on R45	R0.33						Planning, Design and Construction	SM		✓	✓		High	
53	Wemmershoek: Formalise footpath on the western side of the R301 up to Wemmershoek access and pedestrian crossing at school access road	R1.60						Planning, Design and Construction	SM		✓	✓		High	
54	Wemmershoek: Formalise footpath on southern end of Wemmershoek up to school	R1.22						Planning, Design and Construction	SM		✓	✓	✓	Medium	
TOTAL (Rands Per Million)		R126.30	R0.00	R0.00	R0.00	R0.00	R0.00								

Note:

Projects 1-34 are located within the wider Stellenbosch town area.

This list includes short-term projects of High (essential) and Medium (desirable) importance.

Costs are Total Project Costs incl. fees. Annual Maintenance to be added.

Funding source to be confirmed.

Table 12.5: List of Roads Infrastructure Projects

Project No.	Projects	Financial Year					Type	Funding Source	Strategic Focus Areas				Priority	
		Project Budget (Million Rands)							Valley of Possibility	Green and Sustainable	Safe Valley	Dignified Living		Good Governance and Compliance
		2020/21	2021/22	2022/23	2023/24	2024/25								
SRMP001	New Link Road between R310 and R304 (Western bypass - Portion north of Adam Tas Road)			R115.40			Feasibility	SM/WCG	✓	✓	✓	✓	Medium	
SRMP002	New Link Road between R44 (Techno Park) and R310 (Adam Tas Road). Western Bypass - interim portion south of the R310.	R1.00	R95.10				Planning	SM/WCG	✓	✓	✓	✓	High	
SRMP003	New road between R44 (near Annandale Road) and R310 (Adam Tas). Western Bypass, ultimate portion south of the R310.						Concept	WCG	✓	✓	✓	✓	TBC	
SRMP004	Kromme Rhee Road						Planning	WCG	✓	✓	✓	✓	Medium	
SRMP006	R44 / Merriman Street		R2.00		R30.00		Planning, Design and Construction	SM	✓	✓	✓	✓	High	
SRMP007	Bottellary Road / R304 / Devonvale Rd (Blumberg Dr)				R33.20		Roundabout completed	SM	✓	✓	✓	✓		
SRMP008	R44 / R310 (Helshoogte Road)	R2.00	R1.80	R5.00			Planning, Design and Construction	SM	✓	✓	✓	✓	High	
SRMP009	R44 / Alexander Street / Adam Tas	R2.00	R2.70		R30.00		Planning, Design	SM	✓	✓	✓	✓	High	
SRMP010	R44 / Winery Road		R34.10				Planning	WCG	✓	✓	✓	✓	High	
SRMP011	R44 / Annandale Road						Complete	WCG	✓	✓	✓	✓		
SRMP012	R45 (Huguenot Rd) / Le Roux Street	R1.00	R1.00	R10.00			Planning, Design and Construction	SM	✓	✓	✓	✓	High	
SRMP013	R45 (Huguenot Rd) / La Provence Road						Planning	SM	✓	✓	✓	✓	TBC	
SRMP014	R45 (Huguenot Rd) / Uitkyk Street						Planning	SM	✓	✓	✓	✓	TBC	
SRMP015	R45 (Huguenot Rd) / Louis Botha Road						Planning	SM	✓	✓	✓	✓	TBC	
SRMP016	R45 (Huguenot Rd) / Lambrechts Road						Planning	SM	✓	✓	✓	✓	TBC	
SRMP017	R45 (Lambrechts Road) / Nerina Street						Planning	SM	✓	✓	✓	✓	TBC	

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G February 2020 Parking Report: First phase costing

AGENDA

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Table 5.4: Costing of four Projects to catered for on First Phase of Parking Provision

	Closed Garage equivalent in US, 5 levels at avg 400 vehicles per level	Proposed size of Garage	R150 000 per parking bay for Multi Story Parking; R1500 per bay for single level open parking	R6750 operating cost per parking bay	Avg parking tariff per hour	% of time that a vehicle is parked on a park space over 24 hours	Parking Income over 260 work days per annum at the chosen occupancy rate based on 24 hours	Annual Revenue minus Annual operating Cost	Bond repayments over 20 years at 10% interest rate	Net Revenue minus Annual Debt Coverage (parkin rate has been raised to the nearest cent to make this value positive)
Site	Description	Parking Spaces	Total Bond Issue Amount	Annual Operating Costs	Parking Tariff/ hour	Occupancy Rate	Annual Revenue	Net Revenue	Annual Debt Service & Coverage	Net Income Surplus/ (Deficiency)
Van der Stel Area	5 levels (2.5 below grade)	2000	R 300 000 000	R 13 500 000	R 7.74	50%	R 48 297 600	R 34 797 600	R 34 740 768	R 56 832
Eikestad Mall	4 levels (1.5 below grade)	2000	R 300 000 000	R 13 500 000	R 6.45	60%	R 48 297 600	R 34 797 600	R 34 740 768	R 56 832
Techno Park Area	5 levels (2.5 below grade)	1200	R 180 000 000	R 8 100 000	R 7.74	50%	R 28 978 560	R 20 878 560	R 20 844 456	R 34 104
Klapmuts	Only Ground Level – Open parking	100	R 150 000	R 675 000	R 2.22	50%	R 692 640	R 17 640	R 17 364	R 276
Franschoek	Only Ground Level – Open parking	200	R 300 000	R 1 350 000	R 2.22	50%	R 1 385 280	R 35 280	R 34 740	R 540
TOTAL		5500	R 480 000 000	R 21 600 000			R 77 276 160	R 55 676 160	R 55 585 224	R 90 936

6.5 Legal Implications

- a. The Constitutional, Act 108 of 1996, as amended, States under Schedule 5B, inter alia:

Part B

The following local government matters to the extent set out for provinces in section 155(6)(a) and (7):

- Traffic & Parking
- b. The Municipal System Act, Act 32 of 2000, has reference and in Particular:
- i. Section 78(3) and (4)
 - ii. Section 76, 77

These sections are discussed under Item 5.1

6.6 Staff Implications

An External Mechanism of the Provision and Operations of Parking Garages to be used as well as an External mechanism of operating open parking space. There wold therefore be no impact on Municipal Staff

6.7 Risk Implication

The risk of inadequate parking and unhealthy components thereof, are reduced.

6.8 Previous / Relevant Council Resolutions:

6.8.1 Section 78(1) commencement

H Cost estimation based on corrected "CITP" Tables 12.2 to 12.5

Replication and correction of "Funding Strategy" numbers of the 2021 "CITP" Section 12 and corresponding calculations																
Tables 12.2 to 12.5 of 2021 "CITP" corrected and augmented with calculations plus Parking Report Numbers																
FRIENDS OF STELLENBOSCH MOUNTAIN 14 JUNE 2021																
SRMP Number	Table and Project No	Project description	FY 2020/21	FY 2021/22	FY 2022/23	FY 2023/24	FY 2024/25	All-FY Total	TBC Estim	Prio rity	Priority Factor	High + Medium Priority Total	Type	Constru ction Factor	Total incl Constr uction	H+M Priority Total incl Constr uction
											0.5			5.00		
	GRAND TOTAL	Rmillion						2,432.91				1,851.43			8,460.46	5,393.58
	% PUBLIC TRANSPORT + NMT							11.10				12.55			6.02	7.99
	% ROADS PLUS PARKING							88.90				87.45			93.98	92.01
	% TOTAL							100.00				100.00			100.00	100.00
Table 12.2: Infrastructure Transport Planning Projects																
	12.2.01a		1.00	1.10	1.40	1.30	1.10	5.90		H	1	5.90	P	5.00	29.50	29.50
	12.2.01b		0.30	1.30	0.30	0.30	0.30	2.50		H	1	2.50	P	5.00	12.50	12.50
	12.2.01c		0.70			0.30		1.00		H	1	1.00	P	5.00	5.00	5.00
	12.2.01d				0.50			0.50		H	1	0.50	P	5.00	2.50	2.50
	12.2.01e			0.60				0.60		H	1	0.60	P	5.00	3.00	3.00
	12.2.01f			0.20				0.20		H	1	0.20	P	5.00	1.00	1.00
	12.2.01g				0.30		0.30	0.60		H	1	0.60	P	5.00	3.00	3.00
	12.2.01h				0.30			0.30		H	1	0.30	P	5.00	1.50	1.50
	12.2.02					0.70		0.70		H	1	0.70	P	5.00	3.50	3.50
	12.2.03				0.60			0.60		H	1	0.60	P	5.00	3.00	3.00
	12.2.04				0.30			0.30		H	1	0.30	P	5.00	1.50	1.50
	12.2.05			0.60				0.60		H	1	0.60	P	5.00	3.00	3.00
	12.2.06				0.70			0.70		H	1	0.70	P	5.00	3.50	3.50
	12.2.07				0.70			0.70		H	1	0.70	P	5.00	3.50	3.50
	12.2.08							0.00				0.00	P	5.00	0.00	0.00
	12.2.09							0.00				0.00	P	5.00	0.00	0.00
	12.2.10		1.00	1.00				2.00		H	1	2.00	P	5.00	10.00	10.00
	12.2.11							0.00				0.00	P	5.00	0.00	0.00
	12.2.12							0.00				0.00	P	5.00	0.00	0.00
	12.2.13							0.00				0.00	P	5.00	0.00	0.00
	12.2.14				0.50	20.00		20.50		M	0.5	10.25	P	5.00	102.50	51.25
	12.2.15		1.00					1.00		H	1	1.00	P	5.00	5.00	5.00
	12.2.16							0.00				0.00	P	5.00	0.00	0.00
	12.2.17							0.00				0.00	P	5.00	0.00	0.00
	TOTAL (Rmillion)		4.00	4.80	5.60	22.60	1.70	38.70				28.45			193.50	142.25
	% of GRAND TOTAL							1.59				1.54			2.29	2.64
Table 12.3: Public Transport Projects																
	12.3.01		13.00					13.00		H	1	13.00	C	1.25	16.25	16.25
	12.3.02		12.00					12.00		H	1	12.00	C	1.25	15.00	15.00
	12.3.03		10.00					10.00		H	1	10.00	C	1.25	12.50	12.50
	12.3.04			0.25	2.00	6.50	6.50	15.25		H	1	15.25	PDC	1.00	15.25	15.25
	12.3.05		0.30	1.00	1.00	1.00	1.00	4.30		H	1	4.30	PDC	1.00	4.30	4.30
	12.3.06				10.00			10.00		H	1	10.00	PDC	1.00	10.00	10.00
	12.3.07			3.00	2.00			5.00		H	1	5.00	PDC	1.00	5.00	5.00
	12.3.08		1.00	1.00				2.00		H	1	2.00	P	5.00	10.00	10.00
	12.3.09				1.00	1.00		2.00		H	1	2.00	P	5.00	10.00	10.00
	12.3.10		0.50	5.00	5.00			10.50		H	1	10.50	PDC	1.00	10.50	10.50
	12.3.11			2.00				2.00		H	1	2.00	P	5.00	10.00	10.00
	12.3.12			1.00				1.00		H	1	1.00	P	5.00	5.00	5.00
	12.3.13			1.00	5.00			6.00		H	1	6.00	PDC	1.00	6.00	6.00
	12.3.14			1.00	1.00	10.00		12.00		H	1	12.00	P	5.00	60.00	60.00
	TOTAL (Rmillion)		36.80	15.25	27.00	18.50	7.50	105.05				105.05			189.80	189.80
	% of GRAND TOTAL							4.32				5.67			2.24	3.52
Table 12.4: NMT Projects																
	12.4.01							0.49		H	1	0.49	PDC	1.00	0.49	0.49
	12.4.02							5.00		M	0.5	2.50	PDC	1.00	5.00	2.50
	12.4.03							4.40		H	1	4.40	PDC	1.00	4.40	4.40
	12.4.04							20.00		H	1	20.00	PDC	1.00	20.00	20.00
	12.4.05							0.61		H	1	0.61	PDC	1.00	0.61	0.61
	12.4.06							8.42		H	1	8.42	PDC	1.00	8.42	8.42
	12.4.07							1.83		H	1	1.83	PDC	1.00	1.83	1.83
	12.4.08							2.14		H	1	2.14	PDC	1.00	2.14	2.14
	12.4.09							8.42		H	1	8.42	PDC	1.00	8.42	8.42
	12.4.10							0.99		H	1	0.99	PDC	1.00	0.99	0.99
	12.4.11							0.95				0.00	PDC	1.00	0.95	0.00
	12.4.12							0.62		H	1	0.62	PDC	1.00	0.62	0.62
	12.4.13							0.10		M	0.5	0.05	PDC	1.00	0.10	0.05
	12.4.14							0.49		H	1	0.49	PDC	1.00	0.49	0.49
	12.4.15							8.00		M	0.5	4.00	PDC	1.00	8.00	4.00
	12.4.16							9.29		H	1	9.29	PDC	1.00	9.29	9.29
	12.4.17							0.85		H	1	0.85	PDC	1.00	0.85	0.85

Appendix H Cost estimation based on corrected "CITP" Tables 12.2 to 12.5

12.4.18							0.56	H	1	0.56	PDC	1.00	0.56	0.56
12.4.19							1.00	M	0.5	0.50	PDC	1.00	1.00	0.50
12.4.20							0.21	H	1	0.21	PDC	1.00	0.21	0.21
12.4.21							0.42	M	0.5	0.21	PDC	1.00	0.42	0.21
12.4.22							0.89	M	0.5	0.45	PDC	1.00	0.89	0.45
12.4.23							2.20	H	1	2.20	PDC	1.00	2.20	2.20
12.4.24							10.31	M	0.5	5.16	PDC	1.00	10.31	5.16
12.4.25							1.22	H	1	1.22	PDC	1.00	1.22	1.22
12.4.26							1.05	M	0.5	0.53	PDC	1.00	1.05	0.53
12.4.27							1.22	H	1	1.22	PDC	1.00	1.22	1.22
12.4.28							2.72	M	0.5	1.36	PDC	1.00	2.72	1.36
12.4.29							4.87	M	0.5	2.44	PDC	1.00	4.87	2.44
12.4.30							1.65	H	1	1.65	PDC	1.00	1.65	1.65
12.4.31							1.65	H	1	1.65	PDC	1.00	1.65	1.65
12.4.32							1.65	M	0.5	0.83	PDC	1.00	1.65	0.83
12.4.33							4.65	M	0.5	2.33	PDC	1.00	4.65	2.33
12.4.34							0.55	M	0.5	0.28	PDC	1.00	0.55	0.28
12.4.35							0.08	H	1	0.08	PDC	1.00	0.08	0.08
12.4.36							0.12	H	1	0.12	PDC	1.00	0.12	0.12
12.4.37							0.15	H	1	0.15	PDC	1.00	0.15	0.15
12.4.38							0.16	H	1	0.16	PDC	1.00	0.16	0.16
12.4.39							0.00	H	1	0.00	PDC	1.00	0.00	0.00
12.4.40							1.84	H	1	1.84	PDC	1.00	1.84	1.84
12.4.41							0.43	M	0.5	0.22	PDC	1.00	0.43	0.22
12.4.42							0.83	M	0.5	0.42	PDC	1.00	0.83	0.42
12.4.43							0.75	M	0.5	0.38	PDC	1.00	0.75	0.38
12.4.44							1.07	H	1	1.07	PDC	1.00	1.07	1.07
12.4.45							1.84	M	0.5	0.92	PDC	1.00	1.84	0.92
12.4.46							0.40	M	0.5	0.20	PDC	1.00	0.40	0.20
12.4.47							1.01	M	0.5	0.51	PDC	1.00	1.01	0.51
12.4.48							1.93	M	0.5	0.97	PDC	1.00	1.93	0.97
12.4.49							2.94	M	0.5	1.47	PDC	1.00	2.94	1.47
12.4.50							0.02	M	0.5	0.01	PDC	1.00	0.02	0.01
12.4.51							0.16	M	0.5	0.08	PDC	1.00	0.16	0.08
12.4.52							0.33	M	0.5	0.17	PDC	1.00	0.33	0.17
12.4.53							1.60	H	1	1.60	PDC	1.00	1.60	1.60
12.4.54							1.22	M	0.5	0.61	PDC	1.00	1.22	0.61
TOTAL (Rmillion)		0.00	0.00	0.00	0.00	0.00	126.30			98.82			126.30	98.82
% of GRAND TOTAL							5.19			5.34			1.49	1.83

Table 12.5: Roads Infrastructure Projects

SRMP001	12.5.01	W/Bypass			115.40		115.40	M	0.5	57.70	P	5.00	577.00	288.50
SRMP002	12.5.02	W/Bypass	1.00	95.10			96.10	H	1	96.10	P	5.00	480.50	480.50
SRMP003	12.5.03	W/Bypass					0.00	M	0.5	0.00	P	5.00	500.00	250.00
SRMP004	12.5.04				50.30		50.30	M	0.5	25.15	P	5.00	251.50	125.75
SRMP005	12.5.05	Missing ???					0.00			0.00	PDC	1.00	0.00	0.00
SRMP006	12.5.06			2.00		30.00	32.00	H	1	32.00	P	5.00	160.00	160.00
SRMP007	12.5.07					33.20	33.20			0.00	P	5.00	166.00	0.00
SRMP008	12.5.08		2.00	1.80	5.00		8.80	H	1	8.80	PDC	1.00	8.80	8.80
SRMP009	12.5.09		2.00	2.70		30.00	34.70	H	1	34.70	P	5.00	173.50	173.50
SRMP010	12.5.10			34.10			34.10	H	1	34.10	P	5.00	170.50	170.50
SRMP011	12.5.11	Unbudgeted					0.00			0.00	P	5.00	0.00	0.00
SRMP012	12.5.12		1.00	1.00	10.00		12.00	H	1	12.00	PDC	1.00	12.00	12.00
SRMP013	12.5.13	Unbudgeted					0.00			0.00	P	5.00	0.00	0.00
SRMP014	12.5.14	Unbudgeted					0.00			0.00	P	5.00	0.00	0.00
SRMP015	12.5.15	Unbudgeted					0.00			0.00	P	5.00	0.00	0.00
SRMP016	12.5.16	Unbudgeted					0.00			0.00	P	5.00	0.00	0.00
SRMP017	12.5.17	Unbudgeted					0.00			0.00	P	5.00	0.00	0.00
SRMP018	12.5.18		2.00				2.00	H	1	2.00	P	5.00	10.00	10.00
SRMP019	12.5.19	Unbudgeted					0.00			0.00	P	5.00	0.00	0.00
SRMP020	12.5.20	Unbudgeted					0.00	M	0.5	0.00	P	5.00	0.00	0.00
SRMP021	12.5.21	Unbudgeted					0.00			0.00	P	5.00	0.00	0.00
SRMP022	12.5.22	W/Bypass					0.00	M	0.5	0.00	P	5.00	25.00	12.50
SRMP023	12.5.23	W/Bypass					0.00	M	0.5	0.00	P	5.00	25.00	12.50
SRMP024	12.5.24	W/Bypass					0.00	M	0.5	0.00	P	5.00	25.00	12.50
SRMP025	12.5.25	W/Bypass					0.00	M	0.5	0.00	P	5.00	25.00	12.50
SRMP026	12.5.26	Unbudgeted					0.00			0.00	P	5.00	0.00	0.00
SRMP027	12.5.27				96.10		96.10	M	0.5	48.05	P	5.00	480.50	240.25
SRMP028	12.5.28	Double counting??			165.30		165.30	M	0.5	82.65	PDC	1.00	165.30	82.65
SRMP028	12.5.28						0.00	H	1	0.00	P	5.00	0.00	0.00
SRMP029	12.5.29	Missing ???					0.00			0.00	P	5.00	0.00	0.00
SRMP030	12.5.30		1.00	10.00		12.30	23.30	M	0.5	11.65	P	5.00	116.50	58.25
SRMP031	12.5.31	Missing ???					0.00			0.00	P	5.00	0.00	0.00
SRMP032	12.5.32	Missing ???					0.00			0.00	P	5.00	0.00	0.00
SRMP033	12.5.33			66.70			66.70	H	1	66.70	P	5.00	333.50	333.50
SRMP034	12.5.34					74.20	74.20	M	0.5	37.10	P	5.00	371.00	185.50
SRMP035	12.5.35		2.00	2.00	30.00		34.00	M	0.5	17.00	P	5.00	170.00	85.00
SRMP036	12.5.36	Missing ???					0.00			0.00	P	5.00	0.00	0.00
SRMP037	12.5.37	Unbudgeted					0.00			0.00	P	5.00	0.00	0.00
SRMP038	12.5.38				9.80		9.80	M	0.5	4.90	P	5.00	49.00	24.50
SRMP039	12.5.39				9.80		9.80	M	0.5	4.90	P	5.00	49.00	24.50
SRMP040	12.5.40	Missing ???					0.00			0.00	P	5.00	0.00	0.00
SRMP041	12.5.41	Missing ???					0.00			0.00	P	5.00	0.00	0.00
SRMP042	12.5.42	Missing ???					0.00			0.00	P	5.00	0.00	0.00
SRMP043	12.5.43	Missing ???					0.00			0.00	P	5.00	0.00	0.00
SRMP044	12.5.44	Missing ???					0.00			0.00	P	5.00	0.00	0.00
SRMP045	12.5.45				11.40		11.40	M	0.5	5.70	P	5.00	57.00	28.50

Appendix H Cost estimation based on corrected "CITP" Tables 12.2 to 12.5

SRMP046	12.5.46	Missing ???					0.00				0.00	P	5.00	0.00	0.00
SRMP047	12.5.47				2.00		2.00		H	1	2.00	P	5.00	10.00	10.00
SRMP048	12.5.48	Missing ???					0.00				0.00	P	5.00	0.00	0.00
SRMP049	12.5.49				63.50		63.50		M	0.5	31.75	P	5.00	317.50	158.75
SRMP050	12.5.50		3.00	5.00			8.00		H	1	8.00	PDC	1.00	8.00	8.00
SRMP051	12.5.51				50.00		50.00		M	0.5	25.00	P	5.00	250.00	125.00
SRMP052	12.5.52	East Link Rd					0.00	120.00	M	0.5	0.00	P	5.00	600.00	300.00
SRMP053	12.5.53	Unbudgeted					0.00				0.00	P	5.00	0.00	0.00
SRMP054	12.5.54				22.10		22.10		M	0.5	11.05	P	5.00	110.50	55.25
SRMP055	12.5.55				5.80		5.80		M	0.5	2.90	P	5.00	29.00	14.50
SRMP056	12.5.56				2.50		2.50		M	0.5	1.25	P	5.00	12.50	6.25
SRMP057	12.5.57					2.00	2.00		M	0.5	1.00	P	5.00	10.00	5.00
SRMP058	12.5.58					29.90	29.90		M	0.5	14.95	P	5.00	149.50	74.75
SRMP059	12.5.59	Missing ???					0.00				0.00	P	5.00	0.00	0.00
SRMP060	12.5.60	Missing ???					0.00				0.00	P	5.00	0.00	0.00
SRMP061	12.5.61	Missing ???					0.00				0.00	P	5.00	0.00	0.00
SRMP062	12.5.62				64.40		64.40		M	0.5	32.20	P	5.00	322.00	161.00
SRMP063	12.5.63				20.20		20.20		M	0.5	10.10	P	5.00	101.00	50.50
SRMP064	12.5.64				37.60		37.60		M	0.5	18.80	P	5.00	188.00	94.00
SRMP065	12.5.65	Missing ???					0.00				0.00	P	5.00	0.00	0.00
SRMP066	12.5.66				28.80		28.80		M	0.5	14.40	P	5.00	144.00	72.00
SRMP067	12.5.67				13.50		13.50		M	0.5	6.75	P	5.00	67.50	33.75
SRMP068	12.5.68					10.60	10.60				0.00	P	5.00	53.00	0.00
SRMP069	12.5.69					15.00	15.00				0.00	P	5.00	75.00	0.00
SRMP070	12.5.70	Unbudgeted					0.00				0.00	P	5.00	0.00	0.00
SRMP071	12.5.71	Unbudgeted					0.00				0.00	P	5.00	0.00	0.00
SRMP072	12.5.72	Unbudgeted					0.00				0.00	P	5.00	0.00	0.00
SRMP073	12.5.73	Unbudgeted					0.00				0.00	P	5.00	0.00	0.00
SRMP074	12.5.74	Unbudgeted					0.00				0.00	P	5.00	0.00	0.00
SRMP075	12.5.75	Unbudgeted					0.00				0.00	P	5.00	0.00	0.00
SRMP076	12.5.76	Unbudgeted					0.00				0.00	P	5.00	0.00	0.00
SRMP077	12.5.77		4.00				4.00		H	1	4.00	P	5.00	20.00	20.00
SRMP078	12.5.78		0.50	0.50	30.00		31.00		H	1	31.00	P	5.00	155.00	155.00
1	12.5.79	Unbudgeted					0.00				0.00	P	5.00	0.00	0.00
2	12.5.80		1.00				1.00		H	1	1.00	P	5.00	5.00	5.00
3	12.5.81		5.00	30.00			35.00		H	1	35.00	PDC	1.00	35.00	35.00
4	12.5.82		3.00	2.00			5.00		H	1	5.00	PDC	1.00	5.00	5.00
5	12.5.83		0.81	0.50			1.31		H	1	1.31	PDC	1.00	1.31	1.31
6	12.5.84				20.00		20.00				0.00	P	5.00	100.00	0.00
TOTAL (Rmillion)			25.31	244.40	242.40	758.20	112.10	1382.41	240.00		838.66			7170.41	4182.26
% of GRAND TOTAL								56.82			45.30			84.75	77.54
Parking provision: First phase estimates from February 2020 Section 78 Parking Report															
Taken from Table 5.4 of the Section 78 Parking Report accepted by Council on 2020-02-26															
	5.4.1	Vd Stel					300.00		H	1	300.00	PDC	1.00	300.00	300.00
	5.4.2	Eikestad Mall					300.00		H	1	300.00	PDC	1.00	300.00	300.00
	5.4.3	Techno Park					180.00		H	1	180.00	PDC	1.00	180.00	180.00
	5.4.4	Klapmuts					0.15		H	1	0.15	PDC	1.00	0.15	0.15
	5.4.5	Franschhoek					0.30		H	1	0.30	PDC	1.00	0.30	0.30
TOTAL (Rmillion)			0.00	0.00	0.00	0.00	780.45				780.45			780.45	780.45
% of GRAND TOTAL							32.08				42.15			9.22	14.47


I Augmented cost table, also correcting serious errors in original Table 12.1

Replication and correction of "Funding Strategy" numbers of the 2021 "CITP" Section 12 and corresponding calculations													
Table 12.1 of 2021 "CITP" corrected and augmented													
FRIENDS OF STELLENBOSCH MOUNTAIN 14 JUNE 2021													
Project Budgets per FY in Rmillion (CITP Version where only the NMT Total is provided)	2020/21	2021/22	2022/23	2023/24	2024/25	Total Rmillion	Total Percentages*	MINIMUM ** Correction factors to account for construction	MAXIMUM ***	MINIMUM Corrected totals Rmillion	MAXIMUM Corrected totals	MINIMUM Corrected percentages	MAXIMUM Corrected percentages
Integrated Planning	4.00	3.80	5.60	22.60	1.70	37.70	1.55	1.00	1.00	37.70	37.70	0.47	0.35
Public Transport	36.80	15.25	27.00	18.50	7.50	105.05	4.32	1.00	1.00	105.05	105.05	1.32	0.98
NMT	25.26	25.26	25.26	25.26	25.26	126.30	5.19	1.00	1.00	126.30	126.30	1.59	1.18
Road Infrastructure	25.31	244.40	242.40	758.20	112.10	1,382.41	56.84	5.00	7.00	6,912.05	9,676.87	86.82	90.22
Parking Infrastructure	156.09	156.09	156.09	156.09	156.09	780.45	32.09	1.00	1.00	780.45	780.45	9.80	7.28
Totals	247.46	444.80	456.35	980.65	302.65	2,431.91	100.00			7,961.55	10,726.37	100.00	100.00
The total R1525.16 in the CITP is wrong!!													
Planning+Transport+NMT	66.06	44.31	57.86	66.36	34.46	269.05	11.06			269.05	269.05	3.38	2.51
Roads+Parking	181.40	400.49	398.49	914.29	268.19	2,162.86	88.94			7,692.50	10,457.32	96.62	97.49
Totals	247.46	444.80	456.35	980.65	302.65	2,431.91	100.00			7,961.55	10,726.37	100.00	100.00
* These percentages still compare "apples with oranges" ie "Planning and Construction" for non-road categories with "Only Planning" for roads													
** "Minimum" assumes that planning and design constitutes 20% of the total cost													
*** "Maximum" assumes that planning/design constitutes 14.3% of the total cost													

J October 2018 comments by FSM on RMP, MSDF, CITP

Comments were submitted by FSM on 5 October 2018 on the Roads Master Plan and the then MSDF; only Page 1 to 6 is reproduced here. Many of those comments made in 2018 apply word for word in the present 2021 comments. A complete version is available on request.

FRIENDS OF STELLENBOSCH MOUNTAIN



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To the
Executive Mayor, Ald. G. van Deventer
and the
Municipal Manager, Adv. G. Mettler
Stellenbosch Municipality

5 October 2018

BY HAND AND EMAIL

Re: Legal and planning considerations regarding the Draft Roads Master Plan, MSDF, CITP and Farm 372/1/2/3

Dear Mayor van Deventer, dear Municipal Manager Mettler,

we write to both of you as respectively the Executive Mayor and Appeal Authority in terms of the Stellenbosch Land Use By-law and the CEO of the Stellenbosch Municipality administration and Chairperson of the Project Committee. Friends of Stellenbosch Mountain (FSM) wish to bring to your attention the matters set out below for your kind consideration. Documents supporting the statements below can be found in the various municipal agendas and minutes, the Farm 372 applications, and to some extent at the website <http://www.physics.sun.ac.za/~egg@fsm/docs18/>

1. Summary

- 1.1 There appears to be no basis in law for the Roads Master Plan of 2012 and the Draft Roads Master Plan as presented to the Stellenbosch Municipality Mobility Forum on 14 September 2018. The Draft Roads Master Plan is therefore noncompliant with spatial planning and transport legislation and its use is probably unlawful. There is no statutory or mandatory requirement for the preparation of a roads plan outside of a Comprehensive Integrated Transport Plan.
- 1.2 Remuneration and expenses paid to date for consulting work focused exclusively on the Draft Roads Master Plan rather than integrated spatial and transport planning must hence be construed as fruitless and wasteful expenditure.
- 1.3 FSM therefore respectfully requests that the Draft Roads Master Plan should be withdrawn before the start of the IDP/MSDF 2018/19 public participation processes in the coming weeks.

- 1.4 Promotion of roads and private vehicles without proper integration with all other modes contravenes Section 5(4) of the National Land Transport Act of 2009 (“NLTA”) and the corresponding sections in the Minimum Requirements for preparation of ITPs of 2016 and the Provincial Land Transport Framework (“PLTF”).
 - 1.5 As a result, IDP and MSDF public participation process presentations must concern themselves with the central legal instruments (the IDP itself, the MSDF, and the CITP) and reflect the integrated approach and topics as required. Presentations concentrating on roads alone rather than the full transport picture are unlawful.
 - 1.6 Likewise, the Draft Roads Master Plan cannot serve as a direct input into the workings of the Project Committee(s) and the Intergovernmental Steering Committee as defined in LUPA and the Stellenbosch Land Use By-law. Rather, the Project Committee(s) work must take into account integrated spatial and transport situation and goals in their entirety and consider all policy goals and Key Performance Indicators rather than just road infrastructure. Roads form a small component both of the MSDF and CITP.
 - 1.7 No new road construction should be approved even in principle before the issue of traffic and the road network has been properly integrated into the MSDF and the Comprehensive Integrated Transport Plan and the present revisions of the MSDF and CITP have been completed and approved in May 2019. The moratorium includes the R44 between Stellenbosch and Somerset West, a possible link of Paradyskloof Road to Trumali Road, and any other segment of any new road in the municipal area.
 - 1.8 The Environmental Impact Assessment ROD approval regarding the Farm 372 development applications pertains only to the extension of Schuilplaats Road. Approval of any other road link between Paradyskloof Rd and Trumali Rd such as L3b and L3c on Figure 1 would therefore require another Environmental Impact Assessment.
 - 1.9 Unwarranted and possibly unlawful interference and conflicts of interest on the part of external parties involved in municipal spatial and transport planning should be stopped.
- 2. On the lawfulness of isolated road planning versus integrated development and transport planning**
- 2.1 There are many indications that unlawful antecedence and priority is being given to planning, funding and construction of new road infrastructure over and above integrated spatial and transport scenarios featuring compact, mixed use and denser land use activity. Planning of roads and public parking is being prioritised over the promotion of travel demand management solutions, public transport development and non-motorised transport.
 - 2.2 The meeting of 13 September 2018 of the Stellenbosch Municipality Mobility Forum (“SMMF”) provided a telling example in at least three ways.
 - (a) The agenda of the SMMF meeting was changed. A balanced initial version which was sent out 7 August for a meeting on 4 September included a range of important topics such as Transit-Oriented Development, NMT, “Traffic Problems” etc, while no mention was made of a Roads Master Plan (“RMP”). That meeting was cancelled. Later, a revised agenda was sent out which contained just the single agenda item of the (Draft) Roads Master Plan. The explanation provided for exclusive concentration on the RMP was unconvincing, especially in the light of the urgency of other issues with a view to the current 2018/19 IDP/MSDF processes and the peripheral status of the RMP within these processes.
 - (b) While the RMP has not yet been released and should not be released, the details and maps presented at the SMMF meeting show unbroken 20th century silo thinking

and a determination to proceed with a purely roads- and urban-sprawl-driven based development model with no regard or respect for the legislation and the Stellenbosch IDP and MSDF. We set out the details below.

- (c) The zeal and urgency of the RMP-related processes contrast with the marked lack of urgency regarding transport matters and the Mobility Forum itself. While critical parameters are being laid down in the months September–November 2018, the next SMMF meeting is scheduled only for January 2019.

2.3 Specifically, the presentation to the SMMF on 13 September 2018 —

- (a) concentrated exclusively on what was called the *Western Bypass* and the so-called *Eastern Link Road*,
- (b) made no mention of the governing principles and legislation or of the approved Stellenbosch IDP/MSDF policies which are supposed to form the basis for spatial and transport planning,
- (c) made no mention of the critically important alternative scenario which would involve *Transit Oriented Development* along with *Travel Demand Management*, including a major shift of trips to various forms of shared travel, cycling and public transport with extensive park and ride operations, along with the some realignment and improvement of the Adam Tas transport corridor to increase passenger throughput,
- (d) presented as fact a set of transport modelling outputs for the proposed bypass roads, whose assumptions and input parameters have not, as had previously been agreed, been shared with other transport planning experts and are therefore in dispute,
- (e) prioritised an eastern link between Paradyskloof Rd and Trumali Road based only on car traffic modelling and without providing any legislation- SDF-, transport- or other principle-based grounds for such prioritisation.

2.4 It has since emerged that **the Stellenbosch Municipal Roads Master Plan in all its forms has no basis in the relevant national, provincial and municipal legislation or policy**. There appears to be no reference to the requirement of a municipal Roads Master Plan in any legislation or policy applicable to Stellenbosch Municipality.

2.5 Rather, there is multiple, unequivocal and explicit reference to integrated land use and transport planning in all of the above. Exclusive concentration on road infrastructure therefore amount to unfair administrative action.

2.6 Simple incorporation of the current RMP into the CITP does not thereby make it lawful. Road network planning is subject to transport legislation. Section 5 of the National Land Transport Act of 2009 (“NLTA”) explicitly requires the national minister to promote public over private transport. Derivative legislation which implements this includes the Minimum Requirements for preparation of ITPs of 2016 (“MR16”) and Section 6.2 of the Provincial Land Transport Framework (“PLTF”) in terms of Provincial Key Performance Indicators (KPIs) (Section 13 of PLTF). Corresponding Municipal KPIs appear in Section 2.6 of the Stellenbosch Comprehensive Integrated Transport Plan (“CITP”).

2.7 A RMP “reborn” as part of the MSDF also remains subject to spatial planning legislation. Comparison of the 2018 approved MSDF with the RMP make clear that RMP contents do not comply with, at a minimum, the MSDF itself or the principles of Chapter 2, Section 12(1), 12(5) and Section 21 of the Spatial Land Use and Management Act (“SPLUMA”). It also likely does not comply with the principles of Section 7 of SPLUMA, including spatial justice, spatial sustainability, efficiency, resilience (flexibility) and good administration: witness the dichotomy between the Department of Engineering and the Department of Planning.

- 2.8 As set out in the appeal by Eggers against the proposed R44 upgrade, new road construction subsidises private vehicle owners while disadvantaging the poor and those using public transport and NMT. This contravenes the above SPLUMA principles.
- 2.9 Even if one were to stay within the narrow ambit of road infrastructure, the Roads Master Plan did not fairly consider all alternatives. Apart from the public transport/NMT priority already mentioned, the Stellenbosch CITP in Section 8.3 explicitly lists three alternatives. Of these, only the two bypass routes have been assessed in any detail so far, while the other alternatives are being ignored. These include capacity improvements of existing arterial roads and a link road between Adam Tas and Plankenbrug Roads on the western side of the railways, as researched in detail in a 2015 Royal Haskoning report on Transit Oriented Development.
- 2.10 Within the narrow ambit of roads, modelling of traffic is a critical input into decisionmaking. The Municipality is currently using only one modelling consultant and is refusing to share parameters and data with other consultants to check assumptions and results.
- 2.11 It is clear to most observers that there is a strong dichotomy between the approaches taken by Stellenbosch Municipality Department of Engineering Services on the one hand and the Department of Planning and Economic Development on the other. To quote, for example, from the minutes of 4 May 2018 of the Municipal Planning Tribunal (“MPT”):
Mr Rabie stated that it seems that there is not a lot of coordination between the departments of Council for example between the Planning department and the Engineering Department. Mr Rabie stated that departments can’t work in isolation. Chairperson agreed with Mr Rabie and stated that this is one organisation which must work together.
Apart from paralysing the planning and all processes, such dichotomy is unlawful as, for example, per Section 7(e) of SPLUMA.
- 2.12 Given that the RMP appears to have no standing in law, given the clear directives of the legislation, and given the KPIs and alternatives in the existing Stellenbosch CITP, it is inexplicable why Stellenbosch Municipality has commissioned and continues to propagate a standalone revision of the Draft Roads Master Plan by, for example, giving it priority at the Mobility Forum over more important and pressing issues in the CITP and MSDF.
- 2.13 It is likewise inexplicable why, during the 2017/18 IDP/MSDF public participation process, the RMP and its details were given broad coverage both by municipal officials and consultants while the legally mandatory Integrated Transport Plan and its many issues was hardly mentioned. Furthermore, written questions by FSM regarding the planned road infrastructure were answered by irrelevant statements, months after the IDP process had concluded.
- 2.14 It is inexplicable why the municipality approved spending of hundreds of thousands of Rands in several MTREF budgets for the revision of the 2012 Roads Master Plan. The RMP is a luxury, not a necessity.
- 2.15 It is furthermore inexplicable that an overwhelming fraction of the grants requested and received from Western Cape provincial agencies for infrastructure projects relate to road infrastructure only.

3. The RMP and public participation processes

- 3.1 At least two public participation processes are required by the legislation; see for example the LUPB and Section 12(1)(o) of SPLUMA. Naturally such processes should reflect those sectoral plans and processes which are prescribed by law.

- 3.2 The RMP is not required by law, but Integrated Spatial and Transport Planning is. It should hence be self-evident that the RMP has no place in official IDP/MSDF public presentations. These should give priority to, and focus on, exactly those spatial and integrated transport plans which are identified and prescribed by the law.
- 3.3 Not focusing on the essential and required components of the MSDF and CITP in favour of irrelevant and extraneous matters would be in violation of the relevant sections of the Promotion of Administrative Justice Act.

4. The role of DTPW

- 4.1 The role of the Western Cape Department of Transport and Public Works (“DTPW”) in the MSDF and specifically the RMP must also be examined. It is well known in Stellenbosch that the *Road Network Management* branch or section of DTPW is playing an inordinately large role in influencing and, it would seem, skewing policy and practice in this municipality towards roads, while the DTPW sections *Transport Management* and *Strategy, Planning and Coordination* seem to play a subordinate role.
- 4.2 For example, the role of DTPW Road Network Management in propagating the controversial upgrade proposals of the R44 between Stellenbosch and Somerset West is well known and documented.
- 4.3 Among many other examples, a letter written on 6 April 2017 by said Road Network Management regarding the proposed Farm 372 developments (see below) convey the level of influence wielded. While the Farm 372 matter at hand related merely to the question of a local extension of Schuilplaats Road, the DTPW letter interferes directly with the work of the Project Committee and the IDP/MSDF processes by attempts to directly prescribe the detail of the large-scale road network:

7. This Branch strongly supports the suggested extension of Wildebosch Road to link with the extension of Trumali Road and should be a priority for implementation by the Municipality which will together with the extension of Wildebosch Road to the Techno Park access on the R44 alleviate congestion at the Blaauwklippen Road and Paradyskloof Road on the R44. The extension of Wildebosch further north should also be considered to provide a parallel alternative to the R44.

- 4.4 Please refer to Figure 1 for a partial map of the “suggested extensions” which in reality amount to a complete change of the entire spatial planning of the region south of the Eerste River — all outside of the legally prescribed principles and processes.
- 4.5 The 6 April 2017 DTPW letter is being quoted within the Farm 372 development applications (see below) as stating a fact. There is also no doubt that the various meetings between the developer consultants and DTPW led to an alignment of the respective proposals.
- 4.6 Similar issues and arguments apply to the so-called Western Bypass and its components, including the so-called *Western Priority Link* propagated by the presentation at the SMMF meeting of 13 September 2018.

5. Consultants and conflicts of interest

- 5.1 Stellenbosch has a history of consultants acting in conflict of interest, being simultaneously remunerated for promoting specific development applications and for consulting for the municipality itself which adjudicates development applications.
- 5.2 The latest example is the iCE Group (Pty) Ltd (“ICE”), which has been acting as consultant for the developers of Farm 372 since at least 2017. Among others, ICE did the traffic

impact assessment for Portions 2 and 3 as well as writing a number of letters and opinions on various questions as reflected in the Farm 372 EIA and appeal documents. ICE also met with DTPW on 15 December 2016, following which the Schuilplaats extension was propagated by all these parties.

- 5.3 On the other hand, ICE had been strongly involved in the 2017/18 MSDF process. ICE director Piet van Blerk gave one of the primary presentations at the November 2017 MSDF public meetings.
- 5.4 ICE has played a large role in the Western Bypass. See for example a letter dated 23 April 2017 from ICE to the Municipality entitled *STELLENBOSCH WESTERN BYPASS — STATUS REPORT*. A four-page list of questions pertaining to this presentation and the bypass submitted in writing by FSM to ICE was ignored. Months later, the IDP office sent a two-paragraph reply which did not even attempt to address the questions.
- 5.5 ICE was furthermore used as consultant during the compilation of the Stellenbosch Development Contribution policies, amongst other drawing up a map of future roads entitled *FUTURE ROAD INFRASTRUCTURE STELLENBOSCH*, document number TCO2203-R-02, which formed part of the May 2017 MTREF documents.
- 5.6 There is therefore no doubt that ICE has a conflict of interest: ICE is acting on behalf of private developers while at the same time influencing and in some case writing Stellenbosch-wide policy, specific road planning and even budgets.
- 5.7 We note that TV3 Architects and Town Planners have acted on behalf of one of the Farm 372 development applications as well as numerous other development applications in the past decades. To prevent conflicts of interest, TV3 cannot therefore consult for Stellenbosch Municipality in any way. Both ICE and TV3 may, of course, participate as Interested and Affected Parties.
- 5.8 No legal persona may act in conflict of interest, including councillors, administration officials, consultants and service providers. We assume that this Municipality is serious about eliminating all possible conflicts of interest.

6. The Farm 372 Portions 1, 2 and 3 development applications

- 6.1 We refer to the application for development of Portions 1, 2 and 3 of Farm 372, the resulting decisions of the Municipal Planning Tribunal (“MPT”) and the controversy regarding the alignment of any connecting road between Paradyskloof Rd and Trumali Rd, which are shown in red in Figure 1 below. We would like to bring to your attention that the Environmental Impact Assessment and the corresponding Record of Decision dated 2017–11–24 authorises only the extension of Schuilplaats Road. Approval of any other road link between Paradyskloof Rd and Trumali Rd such as L3b and L3c on Figure 1 would therefore require another Environmental Impact Assessment. The ICE Group letter of 2018–07–27 similarly notes that the links L3b and L3c would require a new environmental impact assessment. For that reason alone, it would be very unwise to approve or require one of the road alternatives L3b and L3c of Figure 1.
- 6.2 Not approving alternatives L3b or L3c does not automatically imply approval of alternative L3a, the Schuilplaats Rd extension. Of course levels of service along the R44 are bad and will worsen even more. Yet, as set out multiple times in all the legislation, development should be driven not by car-traffic modelling and developer- and demand-driven road construction but by proactive intervention to reduce the use of private motor vehicles.
- 6.3 We note that neither the development applications nor any of the traffic impact assessments or the letters by consultants (ITS, ICE, TV3 et al) or DTPW even attempts to