

27 March 2020

Guillaume Nel Environmental Consultants

Attention: Ms Carina Becker

Dear Sir/s / Madam

**PROPOSED DUALLING OF MAIN ROAD 201 (R301), PAARL, WESTERN CAPE.
GNEC Code: 20565
DEA&DP Ref: 16/3/3/6/7/1/B3/28/1156/19**

Your invitation to provide comment on the above as part of the first Public Participation Process running from 24th February 2020 to 27th March 2020 has reference.

The background information in your letter dated 24 February 2020 suggests that MR201 will attract an increase in approved residential estate development traffic and “will result in increased travelling times being experienced”.

The letter further states that “in order to better accommodate the current and future traffic volumes, as well as to ensure the safety of road users, it is proposed that MR201 be converted into a dual carriageway”.

From these statements, the reason for the upgrade of Main Road 201 is due to an expected increase in traffic volumes and to ensure road safety.

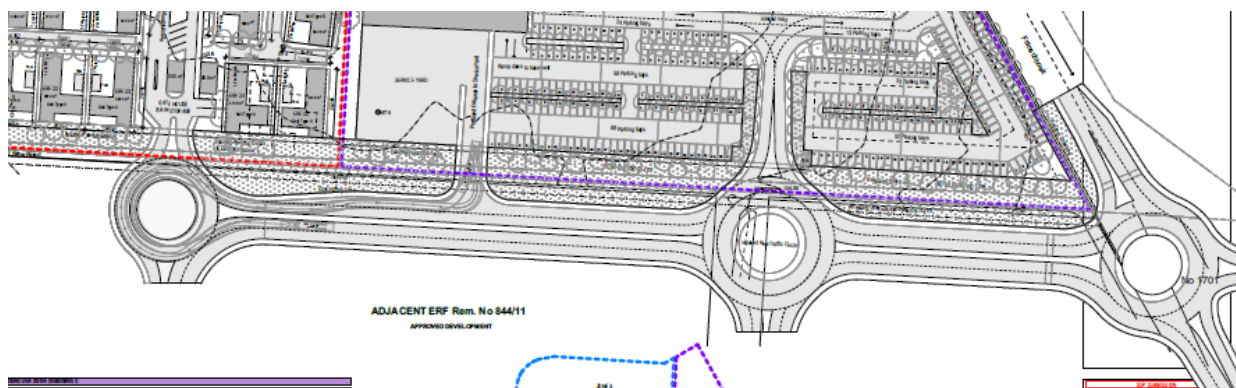
However, the list of Specialist Studies does not include any traffic study to support these statements. It would have been expected that a Traffic Study would be essential to assess and answer the following:

- The upgrade proposals make provision for the consolidation or closure of access points and to maintain others. The closure of OP5252 at km 60.770 will be the closure of a provincial road and not an access (driveway). This road currently provides access to individual properties to the west. How will access to these properties be maintained with such closure?
- Will OP5252 be de-proclaimed as a provincial road and if so, what process will be followed?
- What would the traffic impact be at the major accesses after redistribution of traffic from existing accesses that will be closed?
- Although the letter refers to future traffic volumes, the intersections and access type of control remain unchanged from priority-control. The increase in traffic would suggest

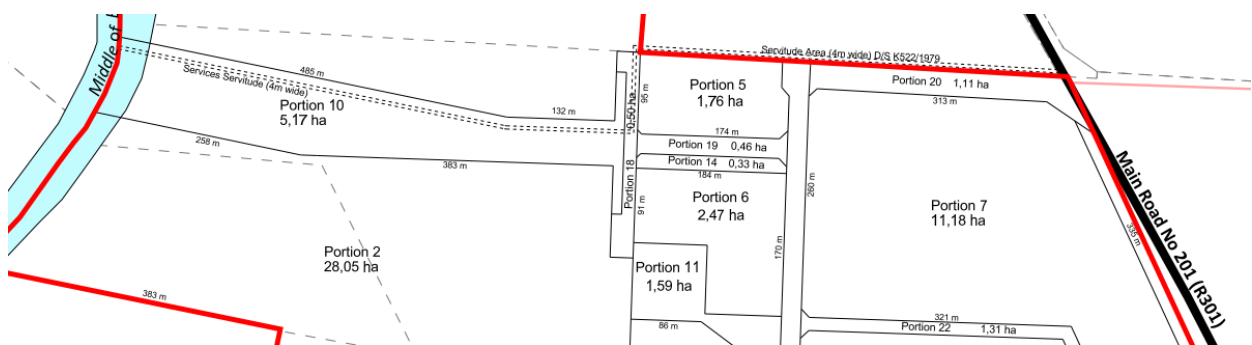


possible signalisation or roundabout-control at these points. Was this assessed in the upgrade proposal?

- Similarly to the above, the intersection point of the access at km 61.650 will be incorrect if the conditions of approval of the developments on erf 26158 and Farm 844 Portion 11 would apply. According to the Drakenstein Municipality SDF for this area, this access will become a Class 3 municipal road of which the road reserve will be located completed on Farm 844 Portion 11.
- The alignment of this Class 3 intersection is shown below as per an extract from the Bretagna approved SDP and also from the Fraaigelegen approved SDP (Portion 20).




Extract from Bretagna SDP



Extract from Fraaigelegen approved SDP (Portion 20 Transport Zone 2)

- Even if the WCG is not responsible for the implementation of certain individual developments' approval conditions, the implementation of major road network of the municipality should be acknowledged to prevent abortive work. How will this be recognised?

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- It is very likely that the traffic operation of the MR201/OP5255 intersection will significantly deteriorate with the replacement of the roundabout with a priority-controlled intersection. The implementation of the roundabout here was for that exact reason, to improve the historic stop-controlled traffic conditions. What would the reason be for this conversion?
 - The current and future traffic operations at this intersection at km 62.410 is likely to introduce driver frustration – especially from the stop-control southern approach. How is this regarded to ensure general road safety of MR201?
 - Roundabouts have been approved at all major intersections (e.g. DR1110 (Lustigan) and the future Class 3 Road). The reason was to reduce speed through the rural environment of the road and thus improve road safety in general. What alternatives to the proposed cross-section and future intersection controls have been assessed to ensure the safety and type of environment?
 - It is unclear how statutory approvals by the WCG on development applications related to upgrades to accesses and intersections along MR201 have been incorporated in the design.
 - Were any existing traffic analyses done for the proposed upgrade of MR201?
 - Were any future traffic analyses done for the proposed upgrade of MR201?
 - The design does not indicate any street lighting. Will this be implemented to increase road safety?

We would appreciate your acknowledgement of receipt of our comment.

Kind regards



MARTHIA ROOS