

Objection from Interested and affected Party :
DURBANVILLE GARDENS DEVELOPMENT: VISSERSHOK ROAD

It is disappointing to see that in spite of four rounds of public comment and input, the development in terms of scale and footprint remains the same. Therefore, unfortunately one has to question the bona fides of the public participation process for this development. Nevertheless, we submit the following comments/objections to this development and the environmental process followed.

1.0 Unacceptably high density and visual impact of the development.

As mentioned in our reply to the 3rd Draft of the Basic Assessment Report (BAR), the City of Cape Town's policy on densification clearly states that *"it is advantageous of the new buildings to be modest in height and size and roughly to conform to the character and built form of the nearby location"*. In the immediate area all the residential buildings are either single or double storey, without exception. The proposed 3 and 4 storey blocks are totally out of keeping with the character and built form of the surrounding area. The maximum building height should be limited to 2 storeys. Therefore, your environmental impact assessment on page 195 of BAR shows the visual impact as medium, this is fundamentally wrong and should be reassessed as either HIGH or Unacceptably HIGH. One just needs to look at the photomontage on the front page of the Town Planning Report (attached) to see that the visual impact can never be considered medium in the development's locational context. Thus, in our considered opinion this impact assessment of the EIA is fatally flawed.

2.0 Traffic Impact understated both locally and at a wider road network level.

Page 200 of the BAR, Section 3: Traffic Impact Assessment, describes the two minor road improvements proposed, then it concludes with the statement that *"with these (two) upgrades in place, the proposed development can be accommodated within the road network of Durbanville."* We make the following comments. Firstly, we believe the traffic impact assessment should take a broader viewpoint of the surrounding road network. With the general densification of Durbanville, and the various new developments, like Village Square Shopping Centre, Pinehurst, Clara Anna-Fontein etc, all the surrounding main roads operate at very low levels of service in both morning and evening peak periods, as well mid-day and school closing times. This development just compounds already poor traffic conditions and further jeopardises road/public safety. Secondly, we question the integrity of the TIA analysis and presentation, for example:

- On account of the large scale of the proposed development and its multi-phased construction, it is not possible for the project to be completed by the design year 2023. If one assumes a 5 to 7-year construction period and the start of construction in say 2021, then a more realistic design year is 2026 – 2028.
- Therefore, allowance of background traffic to a design year of 2022/2023 is a gross underestimation of the prevailing background traffic, particularly in view of the general development and densification that is occurring in the Durbanville area. Hence in our considered opinion, the TIA should be redone based on a more realistic design year/time frame taking into account background traffic growing to 2028.
- The TIA does not make it clear that the traffic associated with Erf 96 development has been generated and distributed as per the trip assignment assumptions in section 14 of the TIA. One finds the statement *"the traffic volumes associated with the Clara Anna-*

Fontein and Erf 96 were included in the background analysis” confusing and misleading. Please confirm that the Erf 96 generated traffic were not treated as escalated background traffic.

- To improve the traffic performance of the main access to the development, it is proposed to add an acceleration lane northbound along Vissershok Road (ie a short central lane merging into the single northbound lane), this is a fairly unusual unsignalized intersection arrangement, but more importantly a potentially unsafe traffic proposal, especially as the general traffic will continue to grow well beyond the design year of 2023. We would like to see both the Provincial Roads Engineer’s and the City Council’s comments on the desirability and safety performance of this proposed access arrangement.
- Please demonstrate that there will be no queue back-up onto the Willow Wood roundabout, for the traffic entering Durbanville Gardens and Erf 96 development, allowing for the standard security procedures for all visitors. A development with 331 units plus a further 60 units on Erf 96 cannot be accommodated with your single lane approach and the stacking distance currently available, if one assumes a realistic service rate.
- In conclusion, notwithstanding the above comments, we find it unacceptable that the Traffic Impact Report has not been upgraded to show the level of service of the key intersections with the proposed road improvements, both as diagrams and tables. Most unprofessional and another example of a fatally flawed aspect of this environmental assessment process.

3.0 Phased Construction of the Development.

We note that the 7 phased construction development diagram is no longer part of the BAR. The proposed multi-phased development is a real concern for the Willow Wood residents. This may mean we have on-going construction (with all its negative impacts) taking place adjacent to Willow Wood for a 5 to 10 year period, or maybe even longer? A totally unacceptable scenario and condition to live under. It’s interesting to note that the Zonvezicht Retirement Village (nearby on Adderley Street) has recently delayed building its second phase, one assumes because of the current low market demand? Durbanville Gardens, in its present form will be more than double the size of Zonvezicht. Therefore, your statement that *“this assessment process does not include the detail forward planning of the construction phases”* is unacceptable, and should be assessed as part of the EIA, as the proposed phased construction is a direct result of the large scale of the development. In addition, one has the construction of Erf 96 which also needs to be factored into the construction program, both in terms of time and phasing. We consider this omission to be another fatal flaw in the EIA process.

4.0 Erf 96: Approval Process

As mentioned in our previous comments, we do not understand how Erf 96 development can be approved in principle with an interim access. Please describe this interim access arrangement? Notwithstanding, the above question, the statement in your covering letter (dated 10 July 2019) states, *“the possibility of linking the proposed development to the authorised development on Erf 96 is also being investigated”*. We understand that it is a separate development, but it is a contradiction of logic to state it is to be linked to Durbanville Gardens and then for it not to form part of this EIA process. The fact that it is proposed for the Erf 96 development to have access through another private development is “most unusual”, and is already complicating this planning process and will complicate the future construction

and operational phases. In our considered opinion Erf 96 should have a separate road access to Durbanville Gardens development. Again, the omission of Erf 96 development as an integral part of this planning application is another fatal flaw in this EIA process.

5.0 Conclusion

Based on the above comments/objections we believe that the Durbanville Gardens Development in its present form will have an unacceptable adverse impact on both the local environment and its residents. For these reasons we believe the Durbanville Gardens Development has been located on an inappropriate site and should find an unencumbered alternative green field site in the greater Durbanville area.

Regards,



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