

26 March 2020

GUILLAUME NEL ENVIRONMENTAL CONSULTANTS
45 Fabriek Street,
PAARL
7620

Attention : Ms. Carina Becker carina@gnec.co.za

Dear Madam,

**PROPOSED DUALLING OF MAIN ROAD 201 (R301), PAARL, WESTERN CAPE
COMMENT AND OBJECTION ON PROPOSED PLANNING DRAWINGS**

We refer to your first public participation notification dated 24th February 2020 (Ref GNEC Code: 20565), Minutes (Ref. MR201 Public Meeting) of a Public Meeting held on 11th June 2019 and a virtual meeting on Wednesday the 25th of March 2020 between Western Cape Provincial Government, BVi Consulting Engineers, Trafficon, Guillaume Nel and Ero-Engineers.

ACB Holdings (Pty) Ltd is mandated to make the following submission on behalf of the following farms that collectively make up the Fraaigelegen Development for which extensive mixed use rights have been secured:

- Ptns 10 & 12 of Farm 844 – Lea Hurwitz Estate
- Ptn 11 of Farm 844 – Fraaigelegen Trust
- Ptn 14 of Farm 844 – Adelaarvlugt Prop Holdings CC
- Ptn 2 of Farm 845 – Cape Hone Bush Tea Co (Pty) Ltd

In terms of this process please register the aforementioned properties both individually and collectively (as Fraaigelegen) as Interested and Affected Parties and notify the following entities in all future correspondence:

- rhona@trademorehouse.com
- simon@sibane.co.za
- robmcg@telkomsa.net
- steve@trafficon.co.za
- leonp@bviwc.co.za
- meyer@mdwinc.co.za

ACB Holdings would like to indicate that we have approved development rights on Fraaigelegen, and that the approved access road to Fraaigelegen and the Bretange falls within the Fraaigelegen Development. This access road has also been designated by the Drakenstein Municipality as the future Class 3 Regional Distributer and accordingly provision was made for the relevant road reserve in our sub divisional approval. We therefore object that the drawings completed by Western Cape Provincial Government and distributed for Public comments does not indicate the position of this Regional Distributer Road (with specific reference to drawing no GD50-588 Layout SH 3 of 4-000) and furthermore we note that certain existing access roads to the aforementioned farms are not indicted on the plan & or shown as being closed, while other “temporary” access roads have been shown.

Accordingly the purpose of the following is to draw your attention to various factors that will impact your current design layout, not least the rights of individual property owners as well as the development rights

granted by the Drakenstein Municipality and other relevant Authorities. The land use development rights were granted based on and incorporating comments submitted by the Western Cape Government: Department of Transport during the development rights applications. We comment as follows:

1. Drakenstein Municipality has defined the Class 3 Regional Distributor (as per their approved SDF) linking the R301 from the proposed temporary intersection at the north east corner of Ptn 11/844 to the Kliprug Minor Road. The status of this road and the sub regional significance of this route does not appear to be reflected on your current design. Kindly update your design layout;
2. The final R301 / Class 3 Road intersection alignment, as required in the Department of Transport comment dated 22nd November 2017 (refer Annexure A) is not reflected on your layout. Kindly update your design layout;
3. We note that whilst certain “temporary” accesses to properties off the R301 have been indicted on your plan (Ref. Plan WCG Index No. GD50/588) others existing accesses to individual farm properties (e.g. Ptn 2 Farm 845 & Ptn 11 Farm 844) are shown as being closed. Accordingly we question why all temporary access points can’t be dealt with separately on a separate set of drawings and how access to all existing farming operations will be secured should they remain as farms
4. The nature of the proposed temporary access proposed for the adjacent Erf 26158 (as indicated on your Plan) will have a material impact on the design and construction of the future access to the Fraaigelegen Development and associated Class 3 Regional Distributor. We again question why this is shown on your Plan and not the correct,, approved access for the Class 3 Regional Distributor;

Bearing in mind the development rights granted on the above mentioned properties it would be appropriate for all parties impacted on by the proposed road upgrade to work towards the future and infal intersection layout, currently missing from the design published for public comment. We request that this should form the basis on any design decisions made in terms of the R301/ route intersection which currently does not appear to be the case.

We trust that you will urgently update the design being circulated for public comment to reflect the future design layout for this intersection and that you will direct your attention and financial allocations to prevent unnecessary costs being incurred by the Western Cape Provincial Government.

This submission is made without prejudice and we retain the right to update our comment based on new information that we may receive.

Yours faithfully,

Simon Beamish

On behalf of ACB Holdings and aforementioned affected property owners

Cc.

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