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To whom it may concern

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Comments on:

PROPOSED PHASE 1 EXTENSION OF HOUMOED AVENUE, SUNNYDALE (DEA:DP REF: 16/3/3/6/7/1/F1/45/2016/17); AND THE PROPOSED PHASE 2 EXTENSION OF HOUMOED AVENUE AND UPGRADING OF MASIPHUMELELE INFORMAL SETTLEMENT, SUNNYDALE AND MASIPHUMELELE, CAPE TOWN; (DEA:DP REF: 16/3/3/6/7/1/A6/50/2153/17)

I have perused the reports as published on Chand's web site and wish to comment as follows:

- 1 I believe that, although the Traffic Impact study appears to have been conducted correctly, the recommendations arising from this study and the conclusions reached are fatally flawed for the following reasons:
 - a. The study does not take into account the limited capacity of the Noordhoek Main road/ Silvermine to Ou Kaapse Weg "Rat-Route" that was being used during the survey.
 - i. It is clear from the traffic counts that almost in the morning peak, almost 34.8% of the traffic leaving the study area towards Cape Town either used Chapmans Peak Drive or Noordhoek Main road/Silvermine Rd to exit the area, thereby indicating that this route is a clearly identified "Rat-Route"
 - ii. This is confirmed by the PM return flows back into the study area, where it is clear that 43.8% of the traffic uses the same "Rat-route" to avoid the heavy congestion that took place along the Ou-Kaapse Weg occurring daily at that time.
 - iii. It is extremely unlikely that this "rat route will still be attractive for traffic expected for the projected 2028 traffic due to the limitations of capacity on that route.
 - iv. This implies that traffic congestion will simply be moved from Kommetjie road to the Buller Louw/Noordhoek road, Noordhoek Rd/Ou Kaapse Weg, Silvermine Rd/Ou Kaapse Weg intersections, regardless of whether the Houmoed road link/s are constructed.
 - v. The above contention can only be disputed if the traffic study is revised to include the traffic capacity of Noordhoek road, Chapmans peak drive and Silvermine road are included. – Until such time, the recommendations of the current traffic study cannot be accepted.
 - b. As is stated in the study report, the survey was carried out during the time that substantial traffic was being diverted from the Boyes Drive/Kalk Bay route due to the construction activities taking place there. The impact of this route being re-opened is not clearly addressed in the report:

- i. More traffic will be entering Kommetjie road from the Fishhoek direction and therefore less from the Ou Kaapse Weg and Chapman's Peak drive (Becoming more expensive year by year)
 - ii. This implies that Houmoed Ave link/s would have far less positive impact than has been concluded in the report.
 - iii. The above assertion can only be disproved if a new traffic count that properly reflects the traffic distribution between Ou Kaapse Weg/Chapmans Peak Drive and the Kalk Bay route is carried out.

- 2 The upgrading works currently being carried out on the Ou Kaapse Weg/Kommetjie Road/ Capri roads must surely cater for at least the proposed development scenario for 2028.
 - a. If not, then this work has been hopelessly under-designed.
 - b. If these upgrades have been under-designed, then it can be argued that the upgrade as is being constructed is tantamount to fruitless and wasteful expenditure and this should be reported to the Auditor General's office.
 - c. The argument that the proposed Houmoed Link/s is/are required proves this unless this link was originally planned as part of the upgrade.
 - d. If the Houmoed Link/s were planned as part of the upgrade, then due planning process was not followed and this should be reported to the relevant authorities also.
 - e. In either event, it is clear that the entire process could be deemed as being flawed and would in all likelihood not stand up to judicial scrutiny.

- 3 The revised BAR refers to the Houmoed Link/s as being part of the City's planning as a motivation that this route should be built. -This planning was however never subjected to any public participation or environmental approval process and this argument can therefore not be used as motivation and such motivation could be regarded as deceitful, showing no regard for legislated processes.

I trust the above comments will be taken into consideration.

Best Regards

A handwritten signature in black ink, appearing to read 'Jon Lijnes', is enclosed in a rectangular box. The signature is written in a cursive style with a long horizontal stroke at the end.

Jon Lijnes Pr. Eng.