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Objections on the Final Draft Basic Assessment Report (BAR) – Wildebosch Road Extension (DEA&DP REF: 16/3/3/6/7/1/B4/45/1342/23)

ZUTARI Project number 1002111

Incorporating THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.

On behalf of the Brandwacht Action Group (BRAG), we formally submit this objection regarding the Final Draft Basic Assessment Report (BAR) for the proposed Wildebosch Road extension and Trumali Street upgrade (the “Application” or “Proposed Extension”), dated 20 February 2026.

BRAG is a coalition of residents in Brandwacht, Bo Dalsig, Dalsig, Welgelegen, Paradyskloof, Brandwacht aan Rivier, and beyond, committed to the responsible and sustainable development of the Stellenbosch area. Since 2023, our organization has actively engaged in the public participation processes for various development applications within our community.

This Application is consistent with a pattern of attempted development in vitally important areas of Stellenbosch, which the public must then invest personal time and energy in objecting repeatedly. Public action has been necessary because Stellenbosch Local Municipality is not upholding its own requirements, responsibilities,

and following due procedure. These proposals, particularly those affecting the Brandwacht and Paradyskloof suburbs, share several concerning commonalities, including:

- **Strategic Ambiguity over Purpose and Basis for the Proposed Extension:** There is a persistent lack of clarity and evidence regarding the specific purpose and long-term necessity of the proposed road extension in transport terms. The failure to disclose ultimate plans or provide full transparency suggests a strategic withholding of information.
- **Lack of Clarity over the Purpose of Extension:** The Application is inconsistent regarding the intended beneficiaries of the project. This ambiguity points toward municipal and developer overreach, seemingly prioritizing undisclosed agendas over established spatial planning, environmental protection, and local community interests.
- **Procedural Deficiencies:** Omissions and errors within the Public Participation Process, cost-benefit analyses, and capacity concerns.
- **Inadequate/incomplete/baseless Transport Case:** Failure to explore or be able to present a robust case for the proposal, or any alternatives.
- **Environmental Concerns:** Significant apprehension regarding the irreparable impact on the local environment.
- **Questionable Need and Desirability:** Insufficient justification for the current necessity or desirability of the project.

We will expand upon each of these points in the subsequent sections of this letter of objection.

Historical context

The draft BAR fails to acknowledge the historical context of proposed developments in the affected area, including the Wildebosch Extension, with extensive community opposition documented back to the early 2000s, citing negative impacts on agricultural productivity, traffic, historical, and visual impacts.

More recently, BRAG formally objected to the Draft Basic Assessment Report (BAR) in October 2025 through a series of communications, including a Formal Objection and a Supplemental filing. While these objections are noted in the Final BAR, this correspondence serves to enhance those points and in no way diminishes or waives

our standing position. BRAG also objected to the inclusion of the construction of the Wildebosch extension in the Stellenbosch IDP Plan and Budget, September 2024.

BRAG has previously submitted objections to the proposed rezoning of Farm 1049 in 2022 (signed by 753 I&APs) and to the EIA and BAR for the proposed development on Farm 1049 (signed by 642 I&APs) in 2025. A substantial portion of these objections related to the ongoing ambiguity surrounding the Eastern Link Road.

The proposed Wildebosch Extension appears closely linked to the anticipated traffic impacts of prospective development on Farm 1049. If such development were to proceed, the road may indeed be required to manage the resulting traffic. However, the Municipality cannot justify the construction of public infrastructure on the basis of speculative or unapproved development proposals. Conversely, the construction of the Wildebosch Extension would almost certainly be used as a motivation to support future development applications on Farm 1049. This creates a circular planning rationale whereby speculative development is used to justify infrastructure, and the infrastructure is then used to justify the development.

Public municipal funding should not be used to facilitate or subsidise speculative private development proposals that have neither been approved nor demonstrated to be necessary within the current lawful planning framework.

Concerns Regarding the Necessity and Validity of the Current BAR

From an overarching perspective, BRAG is concerned by statements made by Stellenbosch Municipality and its representatives at public meetings that, although the Municipality opposes the Wildebosch Road Extension, it is legally obliged to proceed with the second phase of the BAR process once the EIA has been initiated.

Our understanding is that this position is not correct. While the EIA Regulations, 2014, impose procedural requirements on how an application must be conducted and closed, they do not compel an applicant to complete the process through to the grant of environmental authorisation. An applicant, including a municipality, retains the ability, in principle, to withdraw an EIA application prior to a decision being made.

Such withdrawal would need to comply with the requirements of lawfulness, reasonableness, and procedural fairness under PAJA, including appropriate notice to I&APs. These requirements regulate the manner of withdrawal but do not prohibit it. The Municipality may therefore be overstating its legal position in suggesting that it is compelled to proceed with the second phase of this application.

This concern is amplified by the level of public opposition already recorded. The BAR itself reflects almost no support for the road: only a single individual I&AP (excluding government departments) expressed support. None of the parties associated with the speculative development scenarios referenced in the BAR indicated support for, or a need for, the Extension. We have also been informed that the owners of Farm Brandwacht 1049 opposed the road during the first round of public participation.

Despite this, the Municipality and its consultants appear to have failed to properly recognise or respond to the strong and sustained public opposition to the proposed road. This level of opposition should have been a material consideration in determining whether the BAR process ought to have been initiated in the first place. In these circumstances, it would have been reasonable for the Municipality not to proceed with the BAR process. At this stage, the continued progression of the EIA, despite the absence of public support and the Municipality's own stated position that it does not intend to proceed with the road, raises serious concerns regarding the unnecessary and potentially wasteful expenditure of public funds. Withdrawal of the EIA application would therefore be both justified and appropriate to avoid further unnecessary public expenditure.

This application further appears to rely on references to prospective or speculative developers to motivate the road. While prospective developers may qualify as I&APs where they have land ownership, existing rights, or applications that may be affected, a purely speculative interest does not automatically confer I&AP status. Reliance on such speculative development interests to motivate the need and desirability for infrastructure raises serious concerns that the assessment is based on hypothetical development scenarios rather than the current lawful planning framework.

Finally, the validity of the public participation process depends on the transparent disclosure of the planning assumptions and future development scenarios relied upon in the assessment. BRAG therefore challenges the Municipality's reliance on a restricted interpretation of "legal obligation" to justify the continuation of the process and calls for full transparency regarding any future development proposals or planning considerations linked to the Wildebosch Extension. Without such disclosure, the process cannot meet the standards required for informed and meaningful community participation.

Our detailed objections are as follows:-

1. Lack of Clarity over the purpose of the Extension

- 1.1. BRAG's primary objection to development in the Brandwacht/Paradyskloof area continues to be the Stellenbosch Municipality's outdated Eastern Link Road concept. This outdated plan would divert R44 traffic through established residential suburbs toward downtown Stellenbosch. Also known as the Eastern Link Road.

Currently, this Extension represents a "partial development" of this road. The Application mentions numerous times that the current phase is incremental; the completed link is intended to improve traffic operations along the R44.

"The Wildebosch extension forms part of a broader planned link road, which, once fully completed, is expected to significantly improve traffic operations, particularly along the R44 corridor."

"The implementation of this section between Trumali Street and Paradyskloof Road will primarily enable some motorists from Paradyskloof to utilise the new link to access the R44 via the intersection at Trumali Road."

Source: Final Draft Basic Assessment Report (BAR), Pages 30 and 36.

While the Municipality confirmed to BRAG that they intend to ask Provincial Authorities to deproclaim the section of the Eastern Link Road between Downtown and Trumali Road, no formal clarity or confirmation has been provided. It is unreasonable to solicit public comment while such a significant point of contention remains unresolved and unexplained.

- 1.2. BRAG contends that even if the Downtown-to-Trumali link were deproclaimed, the completion of the Eastern Link, stretching from Trumali to Technopark, would inevitably transform Wildebosch Road and the proposed extension into a high-traffic thoroughfare. This is supported by the following comment in the Application:-

*"The existing Wildebosch Road is a single carriage two lane road, which can be classified as a **Class 4** Collector Road. With the long-term function of the completed link road having a **mobility** function, this road may become a **Class 3** arterial road on the further extension thereof to the north."*

Source: *Traffic Impact Assessment (6_Traffic Assessment.pdf), Section 2.2: Existing Road Network, Page 4.*

The absence of long-term RMP and CITP planning data, combined with the potential reclassification, raises serious concerns about the project's transparency. Consequently, the current Public Participation Process is insufficient, as stakeholders lack the necessary information to conduct a meaningful evaluation.

The underlined portion of the above quote

*"With the long-term function of the completed link road having a **mobility** function, this road may become a **Class 3** arterial road on the further extension thereof to the north."*

is highly suggestive that there is in fact no desire to deproclaim the portion to the north through to downtown Stellenbosch, completing what is essentially the Eastern Link Road.

There is a significant risk that the Municipality is pursuing a piecemeal approach to environmental authorisation. Seeking approval for small segments of what may form part of a larger, historically opposed project is misleading to the public and prevents a proper assessment of the cumulative impacts.

- 1.3. The Application repeatedly asserts that the proposed extension integrates with the Road Master Plan (RMP) and the Comprehensive Integrated Transport Plan (CITP).

"According to the Council approved Comprehensive Integrated Transport Plan (CITP), the extension of the Wildebosch Road to Trumali Street is a progressive step in the implementation of a long-term planned road network."

Source: *Final Draft Basic Assessment Report (BAR), Page 6.*

"The project is designed to follow this alignment as approved in the CITP and RMP documents. Therefore, as far as Zutari is concerned, there are no conflicts with regard to the proposed road works."

Source: Final Draft Basic Assessment Report (BAR), Page 20

"According to the Comprehensive Integrated Transport Plan (CITP), the municipality wishes to maintain and further develop road infrastructure to improve travel by all road users."

Source: Final Draft Basic Assessment Report (BAR), Page 21.

However, the Applicant has failed to provide any documentation outlining the specific details of these plans. Without a clear understanding of the statutory basis of these plans, their alignment with the SDF and the IDP, the fundamental grounds for the Application, and its impact on the community cannot be evaluated. This omission deprives the public of the information necessary for meaningful participation and constitutes a material defect that again may render the Application invalid.

This omission deprives the public of the information necessary for meaningful participation and constitutes a material defect in the public participation process, which may render the Application procedurally unfair and potentially invalid.

2. Use of the Extension to facilitate additional Urban Development

- 2.1. BRAG's second major objection concerns the "precedent effect": this incremental extension will likely catalyze further development in the area. Although the Municipality claims no plans are currently pending, BRAG is aware of projects in the pipeline. Establishing this extension would significantly lower the barriers for these future applications, leading to unchecked growth. This is supported by the following statements

"...the phased implementation of the Paradyskloof-Trumali Street portion of Wildebosch Road extension will have immediate benefits in providing access to Paradyskloof and proposed residential developments in the Paradyskloof area as a result of these access restrictions on the R44."

Source: Final Draft Basic Assessment Report for Public Comment (February 2026).

"The Stellenbosch Municipality plans the implementation of the extension of Wildebosch Street in an effort to reduce traffic congestion in the Paradyskloof area and to simultaneously create more capacity on the street network to allow for more developments in the area to take place."

Source: *Traffic Impact Assessment: Extension of Wildebosch Street in Paradyskloof, Section 1.1 (August 2024).*

2.2. The potential for approving this precedent-setting Application is concerning, particularly given previous attempts to expand the Municipalities' Urban Edge. Notably, the now-withdrawn Brandwacht Development Corporation (Pty) Ltd. project faced significant community opposition. The objections detailed in Appendix A, specifically regarding the conversion of zoned Agricultural Land, remain entirely applicable to the current Application.

Furthermore, Brandwacht Development Corporation's own objection and latest request (dated 30 Sep 2025) during the 4th Review of the 5th Generation Integrated Development Plan (IDP) for 2022–2027 to amend the Municipal Spatial Development Framework (MSDF) to include Farm 1049 within the urban edge of Stellenbosch and to earmark the land for future development, reveals its continued intent to develop Farm 1049. Consequently, BRAG contends that this Extension is not intended to alleviate R44 congestion, as the Traffic Impact Assessment suggests, but is instead a strategic move to facilitate further large-scale development.

The Traffic Impact Assessment report specifies that the proposed extension does not relieve any R44 congestion or reduce R44 access times from Parayskloof, stating:

Limited Impact on Existing Intersections: *"The analysis shows that the Level of Service (LOS) at major existing intersections, such as the R44/Blaauwklippen Road and R44/Paradyskloof Road intersections, remains at poor levels (LOS E or F) during peak hours even after the link road is implemented."*

Redirected, Not Reduced, Traffic: *"The extension primarily serves to redirect a small portion of local traffic but does not attract enough volume away from the main arterial routes (like the R44) to improve the general flow in the area."*

Purpose of the Extension: *“The report concludes that the extension's primary benefit is not the improvement of current flow, but rather providing **necessary access for future developments** and establishing a long-term mobility link to the north.”*

Source Information: *Traffic Impact Assessment: Extension of Wildebosch Street in Paradyskloof.*

Page Number: *The detailed analysis and supporting data are found in **Section 4 (Analysis After Implementation of Link Road)** on **page 13**, with the final summary provided in **Section 5 (Conclusions)** on **page 16**.*

Logically, this extension appears to exist solely to facilitate future development. If the Municipality maintains that there are no 'plans circulating' or 'unnamed developers' in Paradyskloof, they must concede that the road is redundant for the current traffic flow. Furthermore, if the Municipality justifies this extension based on the Roads Master Plan or the Comprehensive Integrated Transportation Plan, these documents must be included in this Application to ensure a valid Public Participation Process, and the Applicant must explicitly explain how they support the extension. (See point 1.3 above)

Furthermore, if the Municipality is indeed pushing for development, which BRAG fundamentally opposes, it is unacceptable for the financial burden to fall on the public. The cost of all infrastructure upgrades, including environmental costs, must be borne by the developers, not the taxpayers of Stellenbosch.

The Application also fails to reference Condition 3.11 of the 2009 Amendment of the Stellenbosch Urban Structure Plan (Guide Plan) and the Rezoning of Farm 1049. This condition expressly requires that the remainder of the property be retained for agricultural purposes and prohibits any further urban development on the land.

The Amendment further imposed obligations on the developer of Brandwacht aan Rivier to contribute to the provision of public transport in Stellenbosch, a measure specifically intended to mitigate additional traffic impacts on the R44. It is therefore of significant concern that these conditions appear not to have been properly enforced by the Municipality. It is also striking that the BAR omits any meaningful consideration of improved public transport as an alternative to the Wildebosch Extension, even though this formed part of the original planning framework intended to address traffic pressures in the area. The absence of this

discussion further undermines the assessment, as reasonable alternatives to the proposed road, particularly those already embedded in the applicable planning conditions, have not been properly evaluated.

By omitting reference to these binding planning conditions, the Application disregards a key component of the applicable planning framework. These provisions were specifically designed to align the spatial planning framework with the existing Environmental Authorisation and the original development intent for Brandwacht aan Rivier. Their exclusion from the assessment materially misrepresents the planning status of the property and undermines the integrity of the Application.

3. Procedural Deficiencies in the Public Participation Process

BRAG has the following objection to the information contained in the Public Participation Process (PPP) managed by Zutari and documented in Appendix F.

3.1. Zutari mentions in their Appendix F – Comments and Response Report summary information that they acknowledge the database of I&AP received as follows:-

A total of 112 submissions across all platforms were received during the commenting period. Out of these, only 43 unique comments have been identified, 16 where requests for inclusion in the stakeholder database, and a total of 53 submissions had the same content (similar to a copy-and-paste list of comments).

In a separate detailed register also within Appendix F, 279 Authorities, Interested and Affected Parties are listed, which does not equate to the 112 submissions mentioned above.

Row Labels	Count of TYPE
Adjacent Landowner	12
Authorities	50
City of Cape Town	4
Landowner Adjacent	4
Neighbouring	30
Other	21
Registered I&AP or I&AP	158
Grand Total	279

Furthermore, a review of specific categories reveals several irregularities:

- **Misclassification of Neighbors:** A random selection of the "Neighboring" category found multiple Parties located over 40 kilometers away (near Cape Town Harbor), rather than adjacent to the project site.

- **Irrelevant Stakeholders:** The "Other" category contains Parties with no discernable connection to the Wildebosch Extension.

153 Neighbouring	FFS Refiners
154 Neighbouring	Good Hope Sailing Academy: Principal and General Manager
155 Neighbouring	KEA Projects Group
156 Neighbouring	Offshore Maritime Services: Cape Town Launch Base
157 Neighbouring	Portland Readymix
158 Neighbouring	Royal Cape Yacht Club
184 Other	Two Oceans Aquarium
185 Other	Ward Councillor Paarden Eiland/Milnerton area

While we do not intend to audit every entry, these recurring errors suggest a poorly constructed submission and raise serious concerns regarding the integrity and "good faith" of the Application.

4. Inadequate and Incomplete Traffic Solutions

BRAG has in its supplemental filing dated 28 October has fully set out its objections to this Application; for completeness sake, we provide a summary of those objections.

Absence of Transport Benefit and Traffic Relief

- 4.1. The Application fails to provide evidence of a positive case for investment. The TIA acknowledges that the implementation of this road section "on its own does not have a significant impact on the current intersection performance". Existing connections via Paradyskloof Road and Schuilplaats Road are already adequate and uncongested.
- 4.2. The project provides no relief for the R44, merely shifting vehicle movements from one signalized intersection (Blaauwklippen Road) to another (Trumali Road) without reducing total volume. Claims in the Application that the project will "reduce congestion of the R44" are unsubstantiated and contradict the findings of the TIA.

Irregular Dependency on Future, Unapproved Schemes

- 4.3. The Application erroneously attributes the purported benefits of a "full bypass" or "Eastern Link Road" to this specific Application. The Extension is presented as a singular component of a larger, highly contentious, and unapproved development scheme. (See comments in 1.1)

- 4.4. It is procedurally improper to justify a project of this magnitude by relying on the merits of speculative future developments that lack planning approval. If the primary intent of this road is to facilitate residential expansion on Brandwacht Farm, the infrastructure and residential components must be submitted as a single, integrated application rather than a fragmented municipal project.

Misalignment with Statutory Frameworks

- 4.5. The proposed extension is comprehensively at odds with the 2019 Spatial Development Framework (SDF). The SDF emphasizes investment in Public Transport and non-motorized transport (NMT) solutions rather than building road sections for private vehicles.
- 4.6. The Application incorrectly references the Road Master Plan and CITP, documents that have no legal status or are under heavy objection.

Fruitless and Wasteful Expenditure

- 4.7. With construction costs estimated at over R30 million (excluding VAT and land acquisition) and total public expenditure potentially reaching R50 million, the project lacks a measurable transport benefit. Proceeding without such utility would classify the investment as fruitless and wasteful expenditure.
- 4.8. There is a lack of empirical evidence to support claims of improved accessibility or increased household income. Furthermore, the absence of a comprehensive cost-benefit analysis leaves the financial viability of the Extension entirely unsubstantiated.

5. Environmental and Heritage Concerns

BRAG noted with concern the content of the Environmental Management Programme (EMPr – Appendix H) and has the following objections

Ethical Concerns and Conflicts of Interest

- 5.1. BRAG reiterates the concern and raises the objection that the Stellenbosch Local Municipality is both the applicant for the Extension and the Employer of the Environmental Assessment Practitioner (EAP), Zutari (Pty) Ltd. This creates an inherent ethical tension where the EAP may be incentivized to favor the "long-term planned road network" goals of the municipality over the immediate environmental and community costs.
- 5.2. The Application attempts to justify the Extension as an incremental step for regional traffic performance. This is fully objected to in Point 1 & 2 above, with no evidence of a case on these grounds. The Application provides no account or assessment of the specific heritage, environmental significance, nor reference to the statutory urban edge proclamation for the land in question. As such, there are serious ethical questions on how this Application can be brought forward when the TIA report itself admits traffic conditions will be "largely unchanged" for the broader region in the near term.

Methodological Flaws in Impact Assessment

- 5.3. The Application is generic in its descriptions of mitigation plans and relies heavily on broad management statements (e.g., "Minimise Disturbance" and "Visual & Landscape Integration") rather than site-specific, quantitative thresholds for success. This methodology risks being performative, as it lacks clear, measurable benchmarks to determine if mitigation will actually be effective in protecting biodiversity.
- 5.4. The Application mentions "Wetland-Sensitive Earthworks" and "Hydrology & Flow Continuity," it treats the unchanneled wetland as a technical hurdle to be engineered around rather than an irreplaceable ecological asset. The methodology of using "buffers" and "demarcation" may be insufficient for an unchanneled system where subterranean flow patterns are easily disrupted by heavy road infrastructure.

Noise Assessment

- 5.5. The Application's assessment of the noise is focused disproportionately on temporary construction disruptions. This approach lacks the depth required to address the permanent, long-term degradation of the acoustic environment in established residential areas. This is particularly concerning given the potential for Wildebosch to become a significant Class 3 mobility road. (See point 1.2)

While the report acknowledges noise displacement along the R44 corridor, it fails to provide a spatial assessment of how this redirected sound will penetrate and affect the adjacent quiet neighborhoods.

- 5.6. Furthermore the Application specifically measures a particularly impacted section of the proposed Extension and notes the following:-

"The Wildebosch Extension will introduce noticeable increases in noise levels immediately adjacent to the proposed road alignment. Residences along Du Clair Street and parts of Charme Street, which lie closest to the new route, are expected to experience increases exceeding +5 dB(A), particularly during the nighttime period. These changes are acoustically significant and may alter the existing ambient soundscape for affected properties".

Source Information Final Draft Basic Assessment Report for Public Comment Section H,

Page No. Final Proposed Alternatives, Page 55

The significant impact of this assessment on Paradyskloof and its residents cannot be ignored, especially since the report proposes no mitigation. As a result, these changes will likely trigger a measurable reduction of residential amenity, the loss of the area's original character amenity and a decline in local property values.

Inadequacies in Biodiversity and Agricultural Protection

- 5.7. BRAG notes that although an "Agricultural Statement" is included in the EMP, indicating the high Agricultural potential, there is a methodological failure to provide a cost-benefit analysis that weighs the permanent loss of high-value agricultural land against the temporary relief of local traffic congestion, which is not anticipated to materially change the current traffic patterns as indicated in the Traffic Assessment survey.

"All layout alternatives will traverse the high agricultural potential area over Farm RE/369.

The Proposed Wildebosch Road Extension to Trumali Street is concluded, based on the impact assessment, to have medium to low negative impacts on the socio-economic and biophysical environment, as well as positive impacts through the provision of an alternative road alignment and improved access opportunities."

Source Information Final Draft Basic Assessment Report for Public Comment
Page Number: 65 of 66 (Section: "1.7. CONCLUSIONS OF THE EAP")

A comprehensive cost-benefit analysis is essential before reaching a final decision. The Applicant's own technical findings suggest that the proposed construction yields no measurable relief for R44 congestion. Furthermore, the assessment fails to account for the permanent loss of high-value agricultural land, leaving a significant gap in the project's true economic impact.

- 5.8. The reliance on a "Search and Rescue Plan" for flora is ethically questionable. Relocation methodology often has high failure rates for sensitive species; thus, presenting "rescue" as a primary solution rather than "avoidance" downplays the actual risk of localized extinction for endangered species in the road's footprint.

Heritage and Social Impact

- 5.9. The report lists heritage management under "Chance Finds (Archaeology & Palaeontology)". This reactive methodology is ethically insufficient for an area described as "rich in heritage". It suggests that the project will only protect heritage sites if they are accidentally discovered during construction, rather than conducting exhaustive, proactive preservation.

In addition, a heritage evaluation was carried out by the heritage consultants for the Brandwacht farm in 2003 (SRK Consultants), which concluded that the Brandwacht farm should be classified as a Provincial Heritage Site. This opinion was based on the farm's location, its history, esthetics and its own characters as well as the visual context and the farm's cultural contributions. The Brandwacht Farm is further classified as Very High Significance in the Stellenbosch Heritage Inventory. The Application is insufficient in its justification for receiving no further Heritage evaluation based on the above.

- 5.10. The Extension, per the supporting Technical attachments, aims to provide access to new residential developments, which may fundamentally change the character of the existing Paradyskloof and Brandwacht suburbs. The methodology fails to account for the "social heritage" or the lived experience of residents who chose the area specifically for its quiet, low-traffic environment.

6. Questionable Need and Desirability

- 6.1. The Traffic Impact Assessment acknowledges that Wildebosch Road is currently a Class 4 Collector Road. However, it explicitly states that the long-term intent is to transform this into a Class 3 Arterial Road with a primary "mobility function". We object to the conversion of a neighborhood road into a high-capacity arterial route, which will inevitably increase noise pollution, vibration, and safety risks for local residents.
- 6.2. The Application is explicitly framed as a means to "create more capacity... to allow for more developments in the area to take place". This suggests the road is not merely solving existing traffic issues but is an invitation for rapid, high-density expansion that the current infrastructure and quiet character of the Brandwacht/Paradyskloof area cannot sustain. We object to the use of public funds to facilitate private development at the expense of the existing residential quality of life.
- 6.3. The proposed route extends into currently vacant agricultural land. The transformation from a "quiet neighborhood" and "unbuilt landscape" to a "built landscape", as acknowledged in the Needs and Desirability Report, will have a permanent, negative visual and environmental impact. Furthermore, the introduction of a link road between Paradyskloof Road and Trumali Street will encourage "rat-running" (through-traffic) by commuters seeking to bypass the R44, further destroying the tranquility of our streets.
- 6.4. While the Needs and Assessment Report mentions reducing congestion, it fails to prioritize sustainable transport alternatives, including public transport, or traffic-calming measures for existing residents. Instead, it prioritizes a long-term "mobility" vision that serves transient traffic rather than the community that lives here.

7. Other objections

7.1. While the Application boldly claims a marginal reduction in noise levels along R44 following the Extension, it neglects to account for the displacement of that noise into Paradyskloof. This is a significant omission, particularly given the reclassification of Wildebosch Road to a Class 3 roadway (refer to Point 1.2 above).

"Noise reductions of up to 2 dB(A) are forecast in some areas, most notably adjacent to Blaauwklippen Road and southern portions of Strand Road (R44). This suggests that the extension will help redistribute traffic, relieving some existing noise corridors and marginally benefiting those areas acoustically."

Source: Final Draft Basic Assessment Report (BAR), Page 56, Section: Noise.

7.2. The Application also reveals two significant conflicts of interest. Firstly, the Municipality has appointed Zutari to serve as both the Design Engineer and the Environmental Assessment Practitioner for this project. Secondly, it is concerning that the project briefing originated within the Department of Roads and Stormwater. Standard practice indicates that such initiatives should be motivated by Spatial Development planners to ensure alignment with broader strategic goals, rather than being led primarily by engineering departments.

7.3. Finally, we raise a significant "red flag" regarding the Municipality's administrative capacity: there has been no assessment in the Application of whether the Municipality possesses the specialist internal capacity to manage contractors and ensure strict enforcement of the complex mitigation measures required for the wetland ecosystems, especially given the likelihood that construction will exceed the predicted dry-season timeframe.

Conclusion

Due to the numerous omissions, contradictions, and inconsistencies within this Application, we contend that it fails to meet the necessary standards of transparency required for a project of this magnitude. The lessons learned from the Botmaskop

development remain a significant concern for Stellenbosch residents, and we are determined to prevent a similar outcome on the slopes of Stellenboschberg.

Consequently, BRAG formally objects to this Application. We believe it fails to comply with the standards set forth by the **National Environmental Management Act (Act No. 107 of 1998)** and the **Environmental Impact Assessment Regulations**, and we recommend its immediate rejection. Our rights remain fully reserved.