

Comments to: Appendix H4 - Traffic Impact Assessment (TIA)

1. CONTEXT

Of the 21 reports and assessments forming part of the pre-Application Assessment Report which unanimously support and endorse the Environmental Approval for Skytram, one of the most significant is the TIA. In terms of s209 (9) of the Stellenbosch Zoning Scheme By-law of 2019 ***“Tourist facilities may not have an adverse impact on surrounding properties, in respect of, but not limited to, noise, traffic congestion, pollution, emissions ...”***

2. SUMMARY OF COMMENTS:

The Traffic Impact Assessment:

- 2.1. Underestimates the number of on-site parking bays required at the Lower Station in terms of the Zoning Scheme By-law by not including the 2 732m² viewing deck;
- 2.2. Fails to consider the impact of Uber, minibus and overflow parking on, Huguenot Street, Lambrechts Road, Heide, Nerina and Bagatelle Streets;
- 2.3. Relies on traffic data collected from an electronic counting point 18kms from Franschhoek between January 2017 and February 2022 in much of which there were travel restrictions;
- 2.4. Relies on a traffic survey over a public holiday weekend (18th to 20th March 2022) at three intersections outside Franschhoek (R45/Robertslei, Excelsior Road/Robertslei, and R45 (Pass Road)/Haute Cabriere) and the T at the Monument;
- 2.5. Did not consider the impact of additional Skytram traffic on existing traffic in Huguenot Street and between the village and Groendal;
- 2.6. Ignored the results of the Traffic Count in Huguenot Street by the FHRPA in April 2023;
- 2.7. Did not consider the traffic impact of the number of passengers exceeding an assumed maximum of 3 000 passengers a day in season as Skytram has a capacity of over 6 000 passengers a day;
- 2.8. Underestimates the time spent by visitors at the top station and the availability of parking bays at the lower station;
- 2.9. Does not consider the traffic impact if Skytram cannot operate because of wind or cloud;
- 2.10. Does not consider left and right turning lanes at Haute Cabriere to be necessary;
- 2.11. Makes unsubstantiated assumptions as to the number of Skytram passengers who will arrive by large and small tour buses, Ubers, cars, and a Winetram shuttle, small variations of which can significantly affect the volumes of additional Skytram traffic;
- 2.12. Assumes a Winetram operated shuttle without evidence of its agreement;
- 2.13. Does not consider the dangers of drivers being distracted by cable cars crossing the Pass Road;
- 2.14. Does not consider the problem of Ubers as experienced at the Winetram car park;
- 2.15. Does not consider the impact of heavy construction vehicles particularly those carrying abnormal loads passing through the village;
- 2.16. Does not consider the need for a pedestrian crossing of the Pass Road as there will be hiking trails between the Upper and Lower Stations.

Conclusion:

The TIA is **significantly flawed** because of these defects and omissions and an Application for Environmental Approval cannot be considered until and unless they have been rectified.

3. DETAILED COMMENTS:

The developers TIA is quite a simplistic and theoretical examination of the impact of the increased traffic and is far from the detailed and rigorous examination of the real-life consequences that is required. There are many assumptions made in the TIA which have the effect of reducing the consequence of the effects of the increase in traffic volume and the report essentially contents itself with: A simplistic desktop study of theoretical volumes at a limited number of junctions (remembering that effectively Franschoek is one road in and one road out), supplies an estimation of parking numbers at Haute Cabriere and finally examines left and right turner warrants at a few junctions (the primary two being 5km apart) but omits a proper assessment of the most vital junction at Lambrechts Rd / Haute Cabriere.

Unsurprisingly the TIA concludes that there is no problem in Franschoek coping with 1970 extra vehicle movements per day during peak season. This response document to the TIA sets out the reasons where and why the TIA rationale is flawed in many parts and when those flaws are corrected an entirely different conclusion can be reached. Which is that, during peak season there will be long traffic queues entering Franschoek, gridlock within Franschoek, long holdups on Lambrechts Road in turn restricting access to the Franschoek pass. All this results in a much-reduced quality of life for the residents of Groendal and Franschoek and frustrating experience for visitors and significant delays in the movement of commercial goods through Franschoek and up to the Franschoek pass and the wider local road network.

Statement page 3:

#2, Land Use states: "Based on Table 2.2, the additional GLA after constructing the components for the Upper Station as highlighted in yellow will typically range from $\pm 800\text{m}^2$ to $\pm 950\text{m}^2$ GLA (assuming that the GLA ranges from 85% to 100% of the footprint area).

The total new GLA for the Lower and Upper Stations is therefore between $\pm 1150\text{m}^2$ - $\pm 1350\text{m}^2$."

Comment:

The area of the Timber Decking in Table 2.2 is 2372m^2 and the maximum number of people at the top station in peak season is given as 550. The numbers of covers in the cafe and restaurant are not given. As the purpose of going to the top station is to take in the view from the Timber Decking, it must be assumed that all visitors will do so before visiting the shops or restaurants.

"Gross Leasable Area" (GLA) is defined in the Municipal Zoning Scheme By-law as "the total area designed for or capable of occupancy by tenants for their exclusive use, including storage areas which are leased, and external areas which are used for business (for example outdoor trading and dining areas) but excludes [common parts etc]".

Although the Timber Decking at the top station may not be used for business as such it is the key, vital and integral element of the business of Skytram. It is the Timber Decking from which its passengers take in the view. That is the Unique Selling Point of Skytram. The Timber Decking is, therefore, "used for business" and must, therefore, be included in calculating the GLA.

The TIA estimates the GLA at the top station to be 789m² @ 85% of footprint and the number of parking bays required for the top station as being 59 at 4 per 100m² as per the Zoning Scheme (see Table 8.2) in the Off-Peak Season. It is unclear why it is expressed in this way as the Zoning Scheme does not provide for different parking ratios in the Peak and Off-Peak Seasons. However, as the TIA says in para 8.3, "A pragmatic approach is necessary to estimate the parking requirements for the cableway".

Having regard to the fundamental importance to the Skytram project of the Timber Decking at the top station, being pragmatic, and in terms of the Zoning Scheme definition of GLA, as the total GLA at the top station is 789m² + 2372m² = 3161m², @ 4 per 100m², the total bays required for the top station is 128 plus 59 for the lower station making a total of 187. There is, therefore, a shortfall of 39 bays. It must be noted that the parking provision is deemed sufficient in the TIA based on a maximum of 3000 passengers a day but, as shown below, it could be 6000.

Statement page 4:

EStation (Station 5013, Franschoek) traffic data was obtained from the WCG for the period January 2017 to February 2022. The EStation is located at km 16.86 along MR191. At the time of this report the dataset for March 2022 to July 2022 was not yet available.

Comment:

The EStation is located 18+ kms from the site. It hardly provides an indication of traffic movement within Franschoek town.

Statement page 4:

#3.1 states: Figure 3.2 compares the annual traffic distribution (daily volumes) of the 2019 pre-Covid19 data to the available EStation data for 2020, 2021 and 2022 to evaluate the impact of the Covid19 Pandemic. Based on this information and the daily traffic volumes observed for 2022 the traffic has recovered and compares well with 2019 pre-Covid19 data.

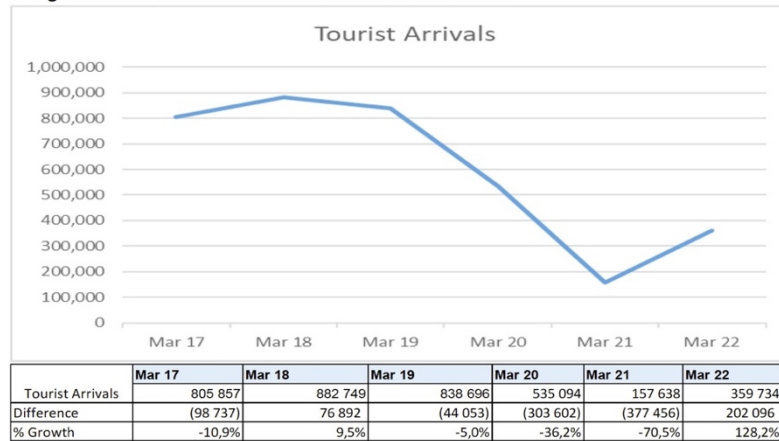
Comment:

It is worth noting that the developer's survey was conducted whilst some local and global COVID travel restrictions were still in place:

- South Africa: adjusted level 1 was in place from 1 October 2021 to 4 April 2022, during which time masks were still a requirement, there were pre travel requisites and vaccine certificates were a requirement for travel.
- The Omicron variant was discovered on 24 November 2021 which led to a number of countries imposing travel bans to South Africa which impacted travel.
- The United Kingdom lifted its covid protocols on 18 March 2022 (the same weekend the TIA was conducted).

South African Tourism Performance Report, March 2022 published a graph that reflects the following arrival patterns for March 2022 in comparison with prior years. Travel had clearly not recovered to pre covid levels.

Figure 1: Total Tourist Arrivals March 2017 to March 2022



Source: Stats SA Tourism and Migration report, March 2022 and tourist arrivals data cuts

Western Cape Government issued a news bulletin on 31 July 2023 which announced the content of the monthly tourism report, compiled by the Western Cape Government's official tourism, trade and investment promotion agency, Wesgro: (<https://www.westerncape.gov.za/news/tourist-arrivals-cape-town-2023-exceed-pre-pandemic-level>)

- The tourism sector continues to shine in the Western Cape with tourist arrivals via air to Cape Town International Airport (CTIA) in the first six months of 2023 exceeding pre-pandemic levels.
- In addition, international two-way passengers remained strong between January and June 2023, reaching 1.4 million, exceeding pre-pandemic levels by 104% and growing by 76% year-on-year.
- 3.2 million domestic two-way passengers passed through CTIA between January and June 2023, representing a year-on-year growth of 9%;
- George Airport two-way passengers reached 374,463 between January and June 2023, a 3% year-on-year increase compared to January to June 2022;
- Between January and June 2023, 90% of tourist arrivals via air originated from overseas markets and 10% from the African continent;

While the traffic volumes in March 2022 may have been at a pre covid level, this level was not because of the return of international travel. The increase appears to be driven by other factors, which coupled with the 2023 increase in travel numbers, highlight how imperative a thorough TIA is that factors in what appears to be the impact of the semigration to the Western Cape, together with the 2023 post Covid increase in tourism numbers.

Statement page 5:

3.2 states: "*Haute Cabrière is located within the urban edge of Franschhoek (see Figure 1.1).*"

Comment:

This is incorrect and contradicts the Town Planning Report (Appendix H1 to the BAR) which states that Haute Cabrière is outside the urban edge. The area delineated in Figure 1.1 is not the urban edge of Franschhoek,

From westerncape.gov.za: the purpose of an urban edge is to manage, direct and phase urban growth proactively and to protect the environmental resources outside of the urban area. It must assist all role players in achieving the "triple bottom line" goals of social, economic, and ecological sustainability in development".

Statement page 5:

3.2 states: "However, the town of Franschoek attracts a significant number of tourists and weekend traffic. It is therefore necessary to also consider the traffic patterns as observed over a weekend/long weekend/holiday period that includes influence days in addition to traffic observed on normal days. Updated traffic counts were conducted at selected key intersections on 18 March 2022 (Friday), 19 March 2022 (Saturday) and 20 March 2022 (Sunday). Human Rights Day (public holiday) was on Monday, 21 March 2022, which would imply that the selected days for the traffic counts were all Influenced Days (as per the table in Appendix B of COTO TMH 3); The survey periods are therefore deemed appropriate given that the proposed development is anticipated to typically generate most of its trips over holidays/long weekends. The scope of the 2022 traffic survey is summarised in Table 3.1."

Comment:

This statement, the dates of the Traffic Survey and the locations all show a fundamental lack of knowledge and understanding of Franschoek and of traffic in Franschoek.

Although the first paragraph quoted above acknowledges that it is necessary for "traffic [in Franschoek to be] observed on normal days", the TIA traffic survey was over a public holiday weekend and not on normal days.

Consultation with the relevant local organisations and stakeholders would have revealed the critical existing issues, and therefore the more appropriate intersections to survey. There has been a fundamental disregard for the impact on the residents and existing businesses of Franschoek.

Attached is an Executive Summary of a Traffic Count conducted by the Franschoek Heritage & Ratepayers Association (FHRPA) which was presented to the developer's representative on 16 January 2024 and appears to have been ignored.

The FHRPA's count was conducted within Franschoek town, at the corner of Berg and Huguenot Street from 17th to 22nd April 2023 from 07h00 to 17h00 from Monday to Friday and from 07h00 to 12h00 on Saturday. It was an unexceptional week. There were no Influenced Days. It shows that for one or more hours daily there was at least one articulated lorry with one or two trailers (HGVs) passing the counting point every minute.

While the Franschoek Pass is closed, hardly any HGVs are seen in the village; there is no congestion, no conversation stopping noise, and atmospheric and visual pollution are at acceptable levels.

Although TIA Figures 3.3, 3.4 and 3.5 show Hourly Two-Way Approach Traffic Volumes in graphs for Friday, Saturday, and Sunday – 18th to 21st March 2022 - the TIA does not show the hourly numbers and it is difficult to ascertain them from these graphs.

A very significant proportion of the traffic passing the FHRPA counting point on the corner of Berg and Huguenot Streets would also pass the TIA survey location point at the R45/Excelsior Road intersection. A helpful comparison can therefore be made between the total of 7,166 recorded in the FHRPA's 10-hour Traffic Count on Friday 21st April 2023 with the total in the TIA's survey's 12 hour count on Friday 18th March 2022 which, as is acknowledged

in the TIA, was an "Influenced Day" with a public holiday - Human Rights Day - on the following Monday. This total, however, cannot be found in the TIA or ascertained from the graph in Figure 3.3.

Before closure of the Franschoek Pass to vehicles over 5 tonnes because of flood damage in September 2023, at peak times - here meaning the times of day when the volumes of traffic as recorded in the FHRPA's Traffic Count are highest (see Appendix 1) - there was already severe congestion and very slow-moving traffic in Huguenot Street. It often came to a complete standstill when two or more or a succession of HGVs travelling in opposite directions had to stop and manoeuvre to pass each other. When the Franschoek Pass has been reopened for HGVs, with the additional traffic generated by Skytram (1970 vehicle movements per day at peak), traffic volumes will be well beyond the environmental capacity of Huguenot Street and there will frequently be severe congestion and gridlock.

There cannot be a further traffic count by the developer's traffic engineers until the Franschoek Pass has been reopened to all traffic. As at the date of submission of these comments it remains closed to all vehicles over 5 tonnes.

Statement page 5:

#3.2 states: "The survey periods are therefore deemed appropriate given that the proposed development is anticipated to typically generate most of its trips over holidays/long weekends."

Comment:

It is assumed that this statement was intended to say Skytram will generate "most trips" instead of "most of its" trips over holidays/long weekends.

Table 4.1 on page 12 of the TIA assumes a maximum of 3000 passengers a day but the statement in #3.2 quoted above appears to contemplate a higher number of passengers over holidays and long weekends. The fact that Skytram has the capacity to carry 6000 or more passengers a day is discussed later in these comments.

Between 1 November and 30 March there are 7 public holidays: 16, 25, 26 December, 1 January, 21 March and 2 days for Easter (sometimes that falls in April).

This results in a total of 5 long weekends (not every year because sometimes the holidays fall on Tuesday, Wednesday or Thursday) of which 3 potential long weekends (Easter, Christmas and New Year) would fall inside of the holidays. They would therefore not have a double impact.

That leaves 2 long weekends and a holiday period of 4-6 weeks in December-January and 10 days in March-April to generate the most trips (i.e. more than 3 000 a day). Daily visitors over 3 000 will impact the traffic assessment and the required number of parking bays.

Statement page 6:

Refer to Table 3.1: Scope of March 2022 Traffic Survey

Comment:

It is not explained why the Robertsvlei/R45 and Robertsvlei/Excelsior Road intersections were selected for traffic counts and analysis.

The traffic survey was conducted at three intersections outside the village and one at the exit by the Monument. It did not include a traffic survey within the village on that weekend.

There was no assessment carried out of the intra-Franschhoek traffic and associated congestion in the main road, Huguenot Street, and on the R45 entering the town. This is a fatal flaw.

Statement page 6:

3.2 states: *"Based on the two-way traffic volume of $\pm 1\,300$ vehicles along MR191 at the R45 / Robertsvlei intersection between 16:00 and 17:00 on the Friday, the directional split was observed as $\pm 60\%$ travelling through Franschhoek towards the Overberg and $\pm 40\%$ in the opposite direction"*.

Comment:

Using a public holiday weekend distorts the directional split during a typical non-public holiday peak season weekend. During non-public holiday weekends significantly fewer journeys involve continuing toward the Overberg via the Franschhoek Pass. For traffic passing this intersection, Franschhoek is the destination. This will certainly be the case for the additional Skytram traffic.

Statement pages 9 and 10:

Refer to Figures 3.6 – 3.8: *traffic flow at two intersections.*

Comment:

The junctions assessed (R45/Robertsvlei and R45/Lambrechts) only count the vehicles entering and leaving Franschhoek, in both directions. There is no allowance for the significant intra-town movement of vehicles, including local journeys between Franschhoek and Groendal. These journeys add to traffic volumes without being counted at the two junctions. It is essential to factor in the intra-town vehicle movements to properly understand how traffic flows through and around Franschhoek.

Congestion along Huguenot Street, especially in peak period months has perennially been a problem. The addition of 1970 vehicle movements per day, which must travel along Huguenot Street to go to and return from the development, will overload the existing infrastructure. This will seriously impair the quality of life for the residents of Groendal and Franschhoek.

Statement page 12:

4.1 states: *"Trip data was received from the client based on their expectations considering experience and knowledge from other cableway facilities they are involved with. This informed the trip generation assumptions as part of this study."*

The anticipated number of visitors for the proposed cableway facility in Franschhoek is anticipated to vary from a minimum of 120 visitors per day (during off-peak season e.g., July) to a maximum of 3000 visitors per day over a 12-hour period during peak season (i.e. December/January/February)."

Comment:

It is assumed the "other cableway facilities they are involved with" refers to the Table Mountain Cableway. It appears from Table 4.2 that during the daily peak periods it is expected there will be +/-500 passengers per hour each way. It is not clear whether this expectation is based on the maximum carrying capacity of Skytram or whether it could be more.

According to the 2018/2019 Annual Report of the Table Mountain Cableway Company, in peak season it carried 800 passengers per hour and 6 000 per day in two cable cars with a passenger capacity of 65 travelling over a cable distance of 1.2kms in 4-5 minutes. According to the draft pre-application BAR, Skytram will also operate two cable cars. The downhill speeds of the TM and Skytram cable cars of +/-10m per second are the same so the cycle times will be the same.

The proposed Skytram cable cars have a passenger capacity of 80 to be carried over almost the same distance and in the same time. Although the Skytram cable car will have a 23% greater capacity, according to the Longitudinal Profile in the BAR it can only carry 470 persons per hour which is inconsistent with 800 per hour/6 000 per day for the TM cable cars.

As Skytram will have the capacity to carry at least twice the 3 000 passengers expected by the developer in peak season daily (and thus more than 500 hourly), the TIA should additionally assess the parking requirements and traffic impact of Skytram for up to 6 000 passengers daily or ensure that the developer is forced to limit its ticket sales to a maximum of 3 000 passengers per day.

The developer will know there are often lengthy queues for the TM Cableway at peak times both in peak season and at other times. The number of people arriving at the Skytram Lower Station at peak hours in peak season and at other times is very likely to exceed the Skytram carrying capacity as do the numbers arriving for the TM cableway and is very likely to be well over 500 per hour at peak times. The estimated number of vehicle movements does not consider this probability.

Statement page 13:

Refer to Table 4.1

Comment:

Simple examination of the average traffic flow statistics and the developer's own statements show that the peak periods are between December and February (inclusive).

It is odd the baseline period (and the number of vehicle movements during that period), which underpins the remaining calculations in the TIA, is then taken during a weekend at the end of March 2022. **This lower baseline,**

than the actual peak period, leads to an ongoing under estimation of the effect of vehicle movements and numbers contaminating the TIA and its conclusions.

Statement page 15:

4.4 Hourly Distribution of New Vehicle trips states:

Figure 4.3 New Trips per hour peak season														Total trips	
End of hour	09.00	10.00	11.00	12.00	13.00	14.00	15.00	16.00	17.00	18.00	19.00	20.00			
Total in	27	91	156	161	164	164	123	63	23	10	3	0		985	985
Total out	5	31	128	149	164	164	156	106	46	21	15	0		985	985
														Grand Total	1970
Car in	20	65	100	100	100	100	70	30	10	5	0	0		600	
Car out	0	10	74	90	100	100	100	70	30	15	11	0		600	1200
Net in car park	20	75	101	111	111	111	81	41	21	11	0	0			
Ubers in	5	19	43	47	50	50	42	26	11	5	3	0		301	
Ubers out	5	19	43	47	50	50	42	26	11	5	3	0		301	602
Small bus in	2	5	8	8	8	8	5	2	1	0	0	0		47	
Small bus out	0	1	6	7	8	8	8	5	2	1	1	0		47	94
Large bus in	0	1	2	2	2	2	2	2	0	0	0	0		13	
Large bus out	0	0	2	1	2	2	2	2	2	0	0	0		13	26
Tram in	0	1	3	4	4	4	4	3	1	0	0	0		24	
Tram out	0	1	3	4	4	4	4	3	1	0	0	0		24	48
														Grand Total	1970

Note: The line highlighted in blue is added, by the author, to show the net numbers remaining in the car park each hour.

Comment:

This table shows how the TIA has established the number of vehicle movements using their modal split and the ideal number of visitors which can be accommodated at the top station and a distribution of those visitor numbers throughout the day.

Many significant issues can be raised from TIA table, figure 4.3:

- The average visitor time at the development appears to be <2 hours. Should that time increase, which is very likely because the upper station has dining facilities, wine tasting, souvenir shop, paragliding launch point and access to the Mont Rochelle trails, then the number of parking places to be provided will be significantly less than required. This will lead to congestion in the multi-storey car park, which in turn affects the next issue.
- The total number of incoming vehicle movements during their stated "critical peak hour" (para 3 page 15) is 162 (excluding large buses). This means that a vehicle must turn left or right from Lambrechts Road, enter the car park and park roughly every 20 seconds and then only if the vehicles have an even distribution in the one-hour period. Precisely the same number must exit in the same one-hour period. This assumption does not provide for security measures to inspect sky-tram tickets, drivers asking for directions or any other hold ups. It also doesn't factor in that the car park is likely to empty in batches as up to 80 people exit a cable car at the same time whereas people arriving may choose to come earlier and enjoy the lower station facilities. It is frankly impossible to believe that such concentration (320 vehicles per hour entering and leaving) can be physically achieved without leading to significant inevitable congestion.
- This congestion will in turn cause tailbacks of vehicles on Lambrechts Road towards Franschhoek, and up the Franschhoek pass, causing frustration to Skytram visitors and closing the Franschhoek Pass to through traffic.

- The developer makes no allowance or contingency for non-operational periods of the Skytram, caused by high winds, cloud cover for example at the upper station, or mechanical breakdown. Such occurrences are inevitable (which the developer knows from their own experience) but the vehicle movements in Figure 4.3 will continue to flow. With no vehicles leaving the site (as the visitors wait for conditions to change) the car park will be full by 10.30 am with another 450+ vehicles on their way to the development. There will be parking congestion at the development site and along Lambrechts Road at these times, but the TIA does not consider this. There will also be parking of Ubers and minibuses as well as Skytram overflow parking in Heide, Nerina and Bagatelle Streets that will adversely affect residents.
- How will the developer ensure that only ticket holders arrive at peak times? What measures will be employed by the developer to control excess traffic?
- Why are there no vehicle movements detailed after 19.00 considering that the last passenger trip down (BAR page 55) is 21.00?

Statement page 17:

Refer to Figures 4.5 and 4.6.

Comment:

These tables seek to distribute the development trips by direction of arrival to the junctions being analysed. Both tables minimise the impact at the critical junction (R45 / Lambrechts / Excelsior) by assuming many trips do not pass through Franschoek but either coming from the direction of the Franschoek pass (15%) and somehow from Robertsvlei / Excelsior (33%). The pressure on the critical junction will, in reality, be far greater than the TIA suggests. The very fact that Stellenbosch municipality has already considered upgrading this junction (para 6 page 49) reveals that, under current traffic conditions, the junction is of concern.

Statement page 20:

Refer to Table 6.2

Comment:

Why were SIDRA default conditions ignored? Whilst the developer may consider the applied values "more appropriate", deviating from SIDRA's established criteria assists the developer by ensuring that the SIDRA intersection analysis is more favourable than it would otherwise be.

Statement page 36:

7.2.5 states: A left-turn lane is not warranted at the Lambrechts/Haute Cabrière intersection. This is based on existing traffic volumes as well as the estimated future traffic scenario for the design horizon in 2029 that includes the peak season cableway development traffic.

However, the developer will review and consider upgrading the Lambrechts/Haute Cabrière intersection and construct a left-turn lane and right-turn lane at their own cost to enhance the safety at the access to Haute Cabrière, especially in terms of vehicles travelling down from the direction of the mountain pass. Site Development Plans are shown in Appendix D (also showing the upgraded access to Haute Cabrière off Lambrechts Road).

Comment:

It simply beggars belief that with 166 left turning vehicle movements per hour (at peak) and with a junction approach speed of say <40 km/h (where the speed limit is 80km/h) that no left-turn lane is required. Whilst noting that the developer is proposing to include one (Appendix D) it seems woefully inadequate for the volume of traffic envisaged.

Similarly, the right-turn lane at the same junction is inadequate, especially given the numbers the developer expects to be turning right (coming from the direction of the pass) and knowing a significant number of heavy goods vehicles use the pass.

That there is a single white line immediately before the entrance to Haute Cabrière and a double white line immediately after it with a blind bend beyond as seen in the images below. This is ignored in the TIA.



In this section of the Pass Road, the 80 kph speed limit is often exceeded by light vehicles and motor bikes coming in the opposite direction. There have also been serious accidents with multiple fatalities in the village caused by brake failure and runaway HGVs coming down the Pass Road.

Statement page 38:

8.3 Proposed Parking Provision & Circulation (Peak Season; 3 000 Visitors per day) states:

"A pragmatic approach is necessary to estimate the parking requirements for the cableway at Haute Cabrière for different modes of transport during the cableway's peak periods i.e., December/January/February for 3 000 visitors per day. The assumptions and approaches to estimate the parking demands for each mode of transport will be discussed under separate subheadings. Relevant detail calculations are included in Appendix E."

Comment:

As stated earlier in the response the optimistic assumptions behind the sizing of the multi storey car park (length of visitor stay, entry and parking times, loading and unloading times – currently expected to be 10mins) lead to an under-sizing of the multi-storey car park. If the visitor stay, vehicle loading and unloading, manoeuvring and parking times are increased by only a small margin a multi-story car park at least double the size of the one being proposed by the developer will be required.

The car parking is sized using the transport modal split (Table 4.2 reproduced below)

Table 4.2: Modal Split (Peak Season; 3 000 Visitors per day)

Mode	Split	Average Veh Occupancy*	Estimate of Visitors Per Day
Car	50.0%	2.5	1 500
Ubers (or Similar)	12.5%	2.5	375
Small Tour Bus / Mini-bus	12.5%	8	375
Large Tour Bus	25.0%	40	750*
Tram Service		32	
Total			3 000

If the modal split is changed to say; 12.5% by large bus, 25% by small tour bus and nil by Uber the parking demand at peak times increases to 165. As stated earlier the parking demand further increases if the visitor stay times, drop off and collection times and parking times are longer than those assumed.

Being unable to find a parking bay, Skytram passengers will simply drive on so the potential for additional business in the CBD from Skytram passengers will be marginal at best. The problem will be particularly acute whenever Skytram suspends operations due to weather conditions for example and disappointed passengers try to visit the village at the same time instead. This would overwhelm the village, cause gridlock in Huguenot Street and have a devastating impact on the experience non-Skytram visitors have of Franschoek and on the daily lives of residents.

It must also be noted that for reasons discussed in these comments, there must be serious doubt as to whether arrangements can be made with Winetram for a shuttle service. In the absence of such arrangements, it is highly likely that more passengers will arrive by car at the lower station looking for a parking space.

The assumptions used in this, and most other sections of the TIA are far from “conservative” and real-life conditions demand that the developers’ assumptions must be robustly and rigorously challenged.

Statement page 42:

#8.3.3 states: Figure 8.4 shows an existing gravelled area where Tour Buses currently park along Excelsior Road adjacent to a property locally known as the “circus grounds”. The Municipality indicated that it is not unusual for buses to park there and it would be acceptable if any Large Tour Bus make use of this gravelled area.

Comment:

Large tour buses do indeed park at this location particularly at weekends when they bring visitors to the Franschhoek Craft Market. They make an important financial contribution to the viability of the market and to the craft traders who have stalls there. It is also used by large tour buses during the week. Their passengers spend time and money in the local economy. An assessment of the capacity of this location is needed.

Statement page 42:

#8.3.4 states: It is planned that cableway visitors be transferred from the Large Tour Buses to the existing Wine Tram services. A discussion was held with the Wine Tram company to test the possibility of accommodating additional visitors travelling to/from the proposed cableway at Haute Cabrière. At the time of this report, the Wine Tram company showed an interest (in principle) to put an agreement in place for the sake of expanding their infrastructure to accommodate additional visitors to/from Haute Cabrière for the cableway, but such an agreement has not been formalised. Should there be no agreements with the Wine Tram to meet the additional traffic demand for the cableway, it would be necessary for the Cableway Company to provide a shuttle service to transport visitors from the parking area for the Large Buses to Haute Cabrière and back as needed.

Comment:

There has been more than enough time for these critical arrangements to be formalised as negotiations began well before February 2023. That they have not yet been formalised must cast serious doubt as to whether they ever will be. The TIA must be revised to provide for an alternate arrangement.

Statement page 46:

#9.2 states: "A rough conceptual roundabout is shown in Figure 9.1 which will need to be considered in more detail if this is supported and found to be viable.... Based on Figure 9.1, it is anticipated that some land would need to be acquired towards the monument and further land might need to be utilised pending detail design."

Comment:

The FHRPA was and will be vehemently opposed to a traffic circle at the T at the R45/Lambrechts/Excelsior Road intersection. The grassed semi-circular area on the south side is an important space from which so many visitors view and take photos of the iconic Huguenot Memorial. Photos of visitors with the memorial behind are posted on social media and shown to friends and workplace colleagues, thus "selling" Franschhoek. The importance and intangible value of this area to tourism and to Brand Franschhoek, and the need to retain it as it is must not be underestimated.

The Huguenot Memorial is listed as Grade IIIa in the Stellenbosch Heritage Survey and described as "a unique landmark and has notable cultural and historic significance".

4. TRAFFIC IMPACT ASSESSMENT OMISSIONS:

The traffic impact assessment is not only flawed because of its content, but also because of what it fails to consider:

4.1.1. Distraction of drivers:

Surprisingly, the distraction of drivers by two large cable cars crossing the Franschhoek Pass appears to be downplayed. This is a significant risk to drivers on an already narrow and dangerous road. The Franschhoek pass has shown time and again how dangerous it can be.

Although they are not professionally presented, the photos below give an idea of how a cable car may appear to car drivers, their passengers and cyclists on the Pass road.



4.1.2. Parking on the R45 / Lambrechts Road and in Franschhoek town:

Parking in Franschhoek is a major concern, especially since the parking in the main road and on Lambrecht Road already contravenes policy regarding parking on a Grade II road. Consideration must be given to the general disregard for demarcated parking bays by Uber drivers. Parking on the R45 /Lambrechts Road and the Franschhoek Pass will be inevitable, as has been observed on the Table Mountain access road for years. The difference being that this is a major thoroughfare, used by large HGVs.

Assuming that visitors to the Skytram will also want to visit the town of Franschhoek (as the developer promotes) the municipality will need to provide significant additional off-street parking in Franschhoek. It is well known that during peak times, parking spaces in Franschhoek are scarce. There is no space within the village for additional parking.

Being unable to easily find a parking bay, Skytram passengers will simply drive on so the potential for additional business in Franschhoek from Skytram passengers will be marginal at best. The problem will be particularly acute whenever Skytram has to suspend operations due to weather conditions for example and a large number of disappointed passengers try to visit the village at the same time instead. This would overwhelm the village, cause gridlock in Huguenot Street and have a devastating impact on the experience non-Skytram visitors have of Franschhoek and on the daily lives of residents.

4.1.3. Ubers:

Insufficient consideration is given to the management of Ubers. The existing problem with Ubers parking and stopping on the R45 for Winetram passengers will be compounded. Already we see examples daily of Uber drivers doing U-turns on the R45 and Lambrechts Road. There are examples of problems managing Ubers at tourist attractions all over the Western Cape.

The photographs below were not taken in peak season and depict examples of existing Uber behaviour on the R45 and Lambrechts Roads: they are parked in shaded areas not demarcated for parking, waiting for clients. This is a daily occurrence and law enforcement is absent. The same is bound to happen on the Franschhoek Pass.



Above: taken outside second entrance to La Ferme Chantal Estate R45



Above: taken at Wine Tram Parking



Above: taken on Lambrechts Road – cars parked inside emergency lane

4.1.4. Construction Traffic:

The TIA is silent about the impact of construction traffic. The only reference to construction traffic appears in the BAR (page 177)

Traffic and Transport				
The movement of heavy construction vehicles will affect traffic flows along the access routes.	Movement of construction vehicles	Increased volume of heavy construction vehicles	- Warning Signage for construction traffic turning at the construction access along Lambrechts Road should be erected. - The safety requirements of the OHS Act and the traffic control measures provided in the EMPr (Appendix K) must be implemented during the construction phase.	Minimise the increased traffic congestion during the Construction Phase.

This says little to help understand what, for the communities of Groendal and Franschhoek, will be a period of real disturbance and inconvenience. The developer has not developed (or disclosed) any plans for the delivery of the large construction equipment, significant steel structures (the BAR says they will be fabricated elsewhere) and other materials, which will require numerous large truck transports (including abnormal load transports).

As these are likely to be brought through Franschhoek in its peak tourist season, I&APs must be informed of and allowed to comment on the developer's plans for construction traffic which will inevitably be highly detrimental to the quality of life of residents and the quality of the visitor experience essential to the maintenance of its global reputation.

It must also be noted that to supply electricity to Skytram a cable will have to be laid under the length of Huguenot Street. This will compound the disruption caused by construction traffic and the adverse impact on the visitor experience and the quality of life of residents.

4.1.5. Traffic flow rates:

There is no attempt in the TIA to establish vehicle transit times between junctions during peak season and therefore no attempt to assess how congestion along Huguenot Street and very slow transit times during peak visitor periods, will affect the movement of traffic further back on R45. The introduction of 1970 additional vehicle movements through the day cannot be expected to do anything other than further increase the transit time through Franschhoek.

It must be appreciated that flow rates are not only a function of the number of vehicles transiting but the rate is also conditioned by:

- pedestrian crossings (where the pedestrian has right of way) of which there are 7 along the length of Huguenot Street. Increased visitor numbers mean increased pedestrian movements which increase the frequency of crossing.
- vehicles parallel parking in Huguenot Street which holds up traffic, perhaps the most common cause for current slow transit times through Franschhoek.

4.1.6. Skytram non-operational periods:

The TIA makes no allowance or contingency for non-operational periods of the Skytram, which will arise from such events as high winds, cloud cover at the upper station or mechanical breakdown. Such occurrences are inevitable (which the developer knows from their own experience) and yet the vehicle movements in figure 4.3 will continue to flow. With no vehicles leaving the site (as visitors wait for conditions to change) the car park will be full by 10.30am. With another 450+ vehicles en route there will, inevitably, be severe parking congestion at the lower station and in Lambrechts Road but the TIA does not consider this.

Table Mountain Cableway sits in a city with other attractions to reduce the congestion on non-operational days. Franschhoek, however, is a village and a gastronomic destination. Its restaurants and bars in its CBD are mostly concentrated in less than 1km and mostly full in its peak season. They will be overwhelmed if only a small proportion of Skytram visitors try to gain access to them when it is non-operational in Franschhoek's peak season. This will also adversely affect the reputation of Franschhoek and the quality of life for residents.

4.1.7. Excess visitor numbers:

No provision is made in the TIA for the arrival of visitor numbers more than the precise numbers the developer anticipates. Some contingencies must be included in the TIA for this excess to enable the competent authority to have a more realistic understanding of the total impact.

4.1.8. Emergency vehicles:

Whilst the developer makes provision in the TIA for emergency vehicle parking at the Lower Station there is no plan for quick access by emergency vehicles coming from Paarl or Stellenbosch when there is traffic congestion in Huguenot Street. The additional traffic will make response times even slower than they are today. An emergency vehicle access plan must form part of any credible TIA.

4.1.9. Pollution:

The TIA and BAR fail to address the impact of increased traffic on the air quality within Franschhoek. It is believed this will have an impact on the well-being of its residents.

4.1.10. Pedestrians on the Franschhoek Pass:

The pre-A BAR mentions that the Upper Station will be connected to the Mont Rochelle parking area and trails and by trails to the Lower Station. The TIA does not consider the risk of pedestrians crossing the Franschhoek Pass road and the need for a crossing both at that point and where the trail crosses the road lower down. The photo below is taken on the Villiersdorp side of the pass at the entrance to Mont Rochelle. Note the blind rise coming from the hairpin bend at the top of the Franschhoek pass.



5. CONCLUSION:

The TIA is a deeply flawed document. Its conclusion is based on figures from a baseline traffic survey at unrepresentative locations over an unrepresentative weekend with many optimistic assumptions that appears to show that there is capacity for the increased traffic to be generated by Skytram and it will have little impact. It is a desktop assessment. An assessment based on site visits with the benefit of local interaction and knowledge would have come to a very different conclusion.

It is impossible, in the real world, to imagine that Franschhoek could, without major upgrades and alterations to the existing road network and junctions at significant cost to the province and/or the municipality, absorb an additional 1970 vehicle movements per day without serious congestion, potential gridlock (for the local and wider road network), inconvenience for the resident population and rapid loss of its global reputation as a high end destination for the discerning visitor. The comments on the TIA in this document (and they are not exhaustive) show that to be demonstrably true.

_____ **end of comments** _____

Written by:

Douglas Coleman is a Civil Engineer with over 45 years global experience in the development, construction and operation of large capital projects; highways, municipal scale water / wastewater treatment plant and large power plant (both conventional and renewable). Douglas has owned a home on Franschhoek since 2007.

Edited by:

Barry Phillips is the Co-Chair of the FHRPA, Chair of the FHRPA Heritage Committee and a Franschhoek resident since 2001.

The FHRPA Traffic Count

Executive Summary

The reason for the count

For many years residents, business owners in Franschhoek and the Franschhoek Heritage & Ratepayers Association (FHRPA) have been concerned by the traffic volumes in Huguenot Road and in particular by the number of Heavy Goods Vehicles (HGVs) with single or double trailers passing through the CBD of the village day and night. The sight, sound and smell of them have a severely adverse visual and environmental impact on pedestrians or customers of the 11 restaurants and cafés on Huguenot Road and on the quality of the experience of the visitors that directly or indirectly are the basis for almost all economic activity and employment in Franschhoek and the Franschhoek Valley.

The FHRPA does not have the capacity or resources to measure these impacts. However, this should not be necessary as they can be experienced by walking the length of Huguenot Road or sitting for an hour or so at any of its 11 restaurants and cafés.

Purpose of the Count

The purpose of the count was to obtain accurate data on the types of vehicles using Huguenot Road and when they do so to provide traffic planners and others with empirical evidence to support the proposition that the adverse impacts of the current volumes of HGVs passing through Franschhoek cannot be reconciled with its status as one of South Africa's premier tourist destinations and that HGVs should not be permitted to enter the village unless their destination is in the village.

Historical Background

Huguenot Road and much of the rest of the village that is now its officially designated Historic Area was laid out in 1847 and designed to accommodate local horse drawn traffic and ox wagons traversing the Franschhoek Pass opened in 1828.

Huguenot Street

Length from intersection
with Louis Botha Street to the Monument: 900m

Roadway Width: 6.1m

Available roadway width:

How the count was organised

The count was at Sotheby's on the corner of Berg and Huguenot Street from 07h00 to 17h00 from Monday 17th April to Friday 21st April 2023 and from 07h00 to 12h00 on Saturday 22nd April 2023.

The week of the count was shoulder season for tourism and after the grape and fruit harvests and when there were no public or school holidays. There were, therefore, no factors present in this week that would affect the traffic volumes.

It follows that at harvest time, in the main tourist season and during school and other holiday periods, the numbers of vehicles in all categories will be higher than those recorded in this count.

The count was conducted by teams of two to four members of the local community "recruited" by five team leaders. Although none of the count participants had any previous experience of participating in a count such as this, almost all of them had some form of tertiary education and were assessed as being competent for the purposes of the count.

Two days Before the count, each count participant was given a sample Report Sheet (Tab Example. Categories of Annexure A) so they could familiarise themselves with the seven categories of vehicles:

- Motor cycles;
- Sedans and MPVs;
- Bakkies and Mini Trucks;
- Minibuses;
- Large buses;
- Tri-axles – i.e. large lorries and single trailer;
- Super-link – i.e. double trailer.

In the quieter periods, there might be a team of two with one calling out the direction and category of vehicle passing the counting point and the other recording it. In busier periods there might be two teams of two with one team recording the passing vehicles in the direction of the Monument and the other in the Paarl direction.

The teams worked in shifts of two to four hours.

The Count Numbers

The hourly and daily numbers of vehicles in each category passing the counting point in the counting period are set out in Annexure A. Table 1 below is a copy of the summary in Annexure A.

Category	M/Cycle	Passenger	Bakkie/S Truck	Minibus	Large Bus	Triaxle	Superlink	Total
Monday	51	3.539	2.157	403	115	196	113	6.574
Tuesday	56	3.671	2.241	429	93	351	103	6.944
Wednesday	71	3.659	2.383	512	106	288	131	7.150
Thursday	53	3.278	1.892	476	130	265	105	6.199
Friday	55	3.962	2.283	385	142	225	114	7.166
Saturday	12	1.554	520	186	29	25	28	2.354
	298	19.663	11.476	2.391	615	1.350	594	36.387
Average Daily Monday to Friday	57	3.622	2.191	441	117	265	113	6.807
Percentage	0.8%	54.0%	31.5%	6.6%	1.7%	3.7%	1.6%	

Table 1

The average daily number of tri-axes and interlinked trucks passing this point from Monday to Friday - 17th to 21st April - recorded in this traffic count was 378 with 454 on Tuesday, 18th April. Except on the Thursday, there was at least one HGV every minute between 1200 and 1300.

The daily average of all vehicles from Monday to Friday in the counting period was 6 807, of which the daily average number of large buses, tri-axes and interlinked trucks was 7% and 12.7% on Tuesday, 18th April. However, the percentage of available road space they used was very considerably higher.

A typical truck with trailers may be up to 15.5m long by 2.45m wide¹ occupying up to 38m² of road space – 6 to 7 times that of a medium to large sedan occupying +/- 7m² to 8m² of road space. A large bus may be 12m long by 2.55m wide² occupying 30.6m of road space – 4 to 5 times that of a medium to large sedan.

The **daily** numbers of large buses, tri-axes and interlinked trucks passing the counting point in the period from Monday to Friday were:

	Large Buses	Tri-axes	Interlinks	Daily Totals
Monday:	115	196	113	424
Tuesday:	93	351	103	547
Wednesday:	106	288	131	525
Thursday:	130	265	105	500
Friday:	142	225	114	481
Totals	586	1325	566	2477

The **hourly** numbers of large buses, tri-axes and interlinked trucks passing the counting point in the period from Monday to Friday were:

	Monday	Tuesday	Wednesday	Thursday	Friday
0700-0800	32	41	37	44	42
0800-0900	24	32	16	25	31
0900-1000	35	63	33	50	60
1000-1100	33	50	43	57	57
1100-1200	39	58	54	41	68
1200-1300	57	116	135	57	61
1300-1400	44	47	29	49	35
1400-1500	63	45	51	58	47
1500-1600	45	53	57	61	35
1600-1700	53	40	68	58	44

¹ Dimensions taken from <https://tirport.com/en/truck-dimensions/>

² <https://www.dimensions.com/element/coach-buses>

The figures in **red** show when there were 50 or more large buses, tri-axes and interlinked trucks **per hour** passing the counting point in the period from Monday to Friday.

It may be seen from the hourly figures that on each of these days there were periods of up to 4 hours, when an almost continuous flow of large buses, tri-axes or interlinked trucks passed the counting point at the rate of nearly or more than one a minute and between 12h00 and 13h00 on the Tuesday it was almost two a minute and on Wednesday it was well over two a minute.

It must also be noted that a very significant number of HGVs pass through the village before 07h00 and after 17h00 on weekdays.

October 2023

End of Executive Summary
