



**N2 WILD COAST ROAD
RESPONSE TO THE ALTERNATIVE INLAND ROUTE PROPOSAL
FROM THE AMADIBA CRISIS COMMITTEE**

26 January 2023

PRESENTATION OUTLINE



- Addressing the concerns raised regarding the approved route
- Unpacking the Public Participation conducted for the N2WTR
- Analysis of the Alternative Inland Route proposal
- Proposal on the way forward

SANRAL



CONCERNS RAISED REGARDING THE APPROVED ROUTE

CONCERNS RAISED BY THE ACC



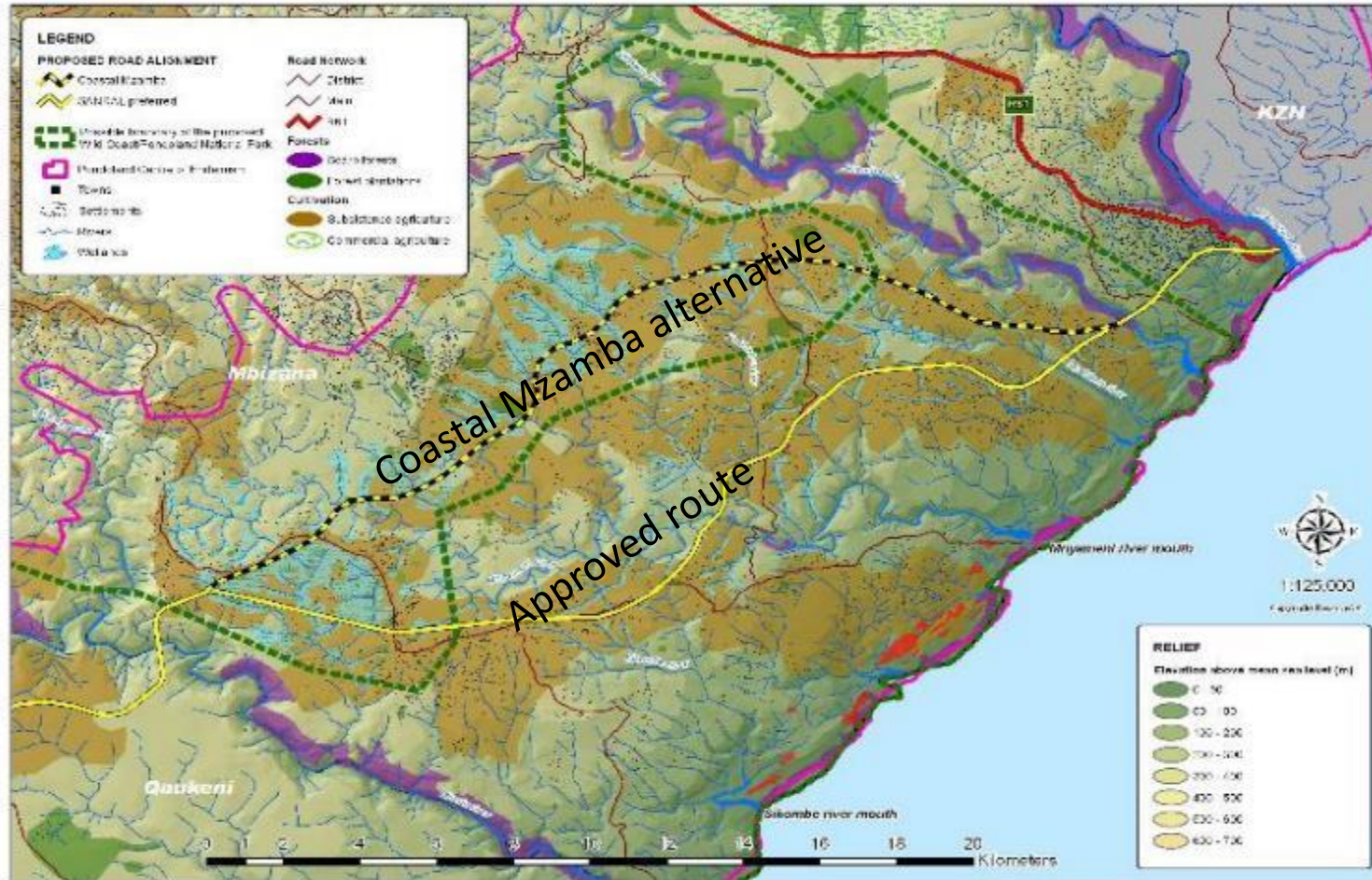
In brief the main concerns highlighted were

1. High Environmental Impact
 - The route affects critical biodiversity areas and wetlands
 - Danger of siltation of estuaries
 - Opening up access for illegal sand mining
 - Loss of rangeland for grazing
2. Ribbon development along the route
 - Increased and unregulated settlement along the route
 - Leading to densification close to towns
 - And leading to a loss of the high mobility benefit
3. Limited local economic benefit
 - Authorised route only benefits 'BMW drivers'

1. Environmental Impact Concerns

- The route affects critical biodiversity areas and wetlands
 - Based on the 2019 Eastern Cape Biodiversity Plan compiled by SANBI it was highlighted the the Authorised Route impacts several areas mapped as 'Critical Biodiversity Area 2' (CBA2) in the vicinity of Bekela, Mdatya and Sigidi as well as one Critical Biodiversity Area 1 (CBA1) in the vicinity of Xolobeni.
 - It was also noted that the approved route crosses '12 wetlands'.
- The road will lead to the siltation of pristine estuaries
- The road will open up access and allow an increase in illegal sand mining
- The road will result in a loss of rangeland for grazing

PREFERRED AND ALTERNATIVE ROUTE STUDIED IN FULL 2008 EIA



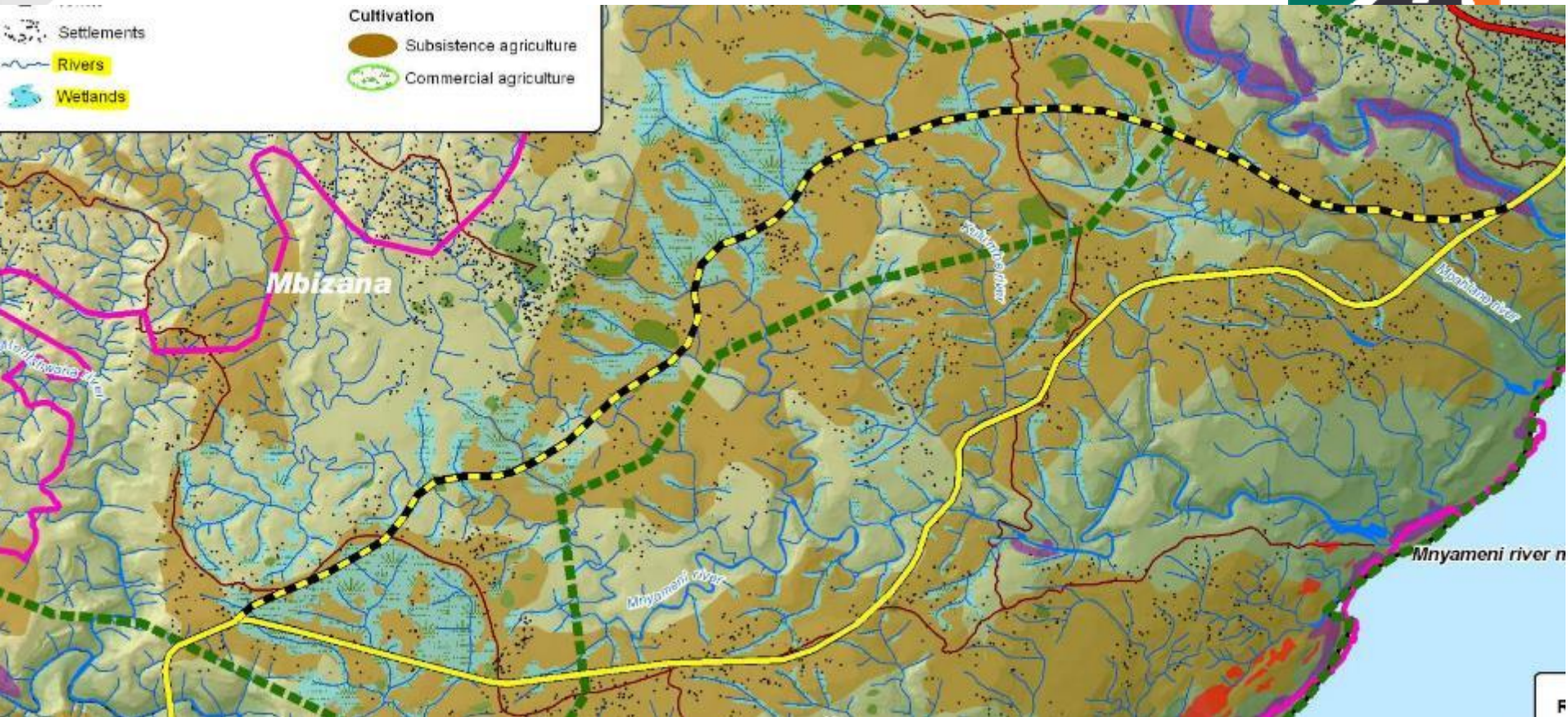
A revision of the Inland Mzamba route called the Coastal Mzamba was included as a feasible alternative under the full EIA study and went through the independent specialist studies and public participation processes in 2008.

ADDRESSING CONCERNS ON WETLANDS



- Part of the preferred route design was to minimise its impact on wetlands
- The route authorised (Yellow) crosses or runs alongside and predominately downstream of four large wetland between Jama and Baleni. The remaining wetlands crossed are relatively minor.
- Where they cannot be avoided the roadbed design for crossing wetlands ensures the integrity and function of these wetlands will be maintained

ADDRESSING ENVIRONMENTAL IMPACTS



- The preferred route (Yellow) planning predated the 2019 Eastern Cape Biodiversity Plan but was informed by Specialist studies and was aligned as far as possible to avoid sensitive environmental areas not already disturbed by human farming activity (brown areas are disturbed)

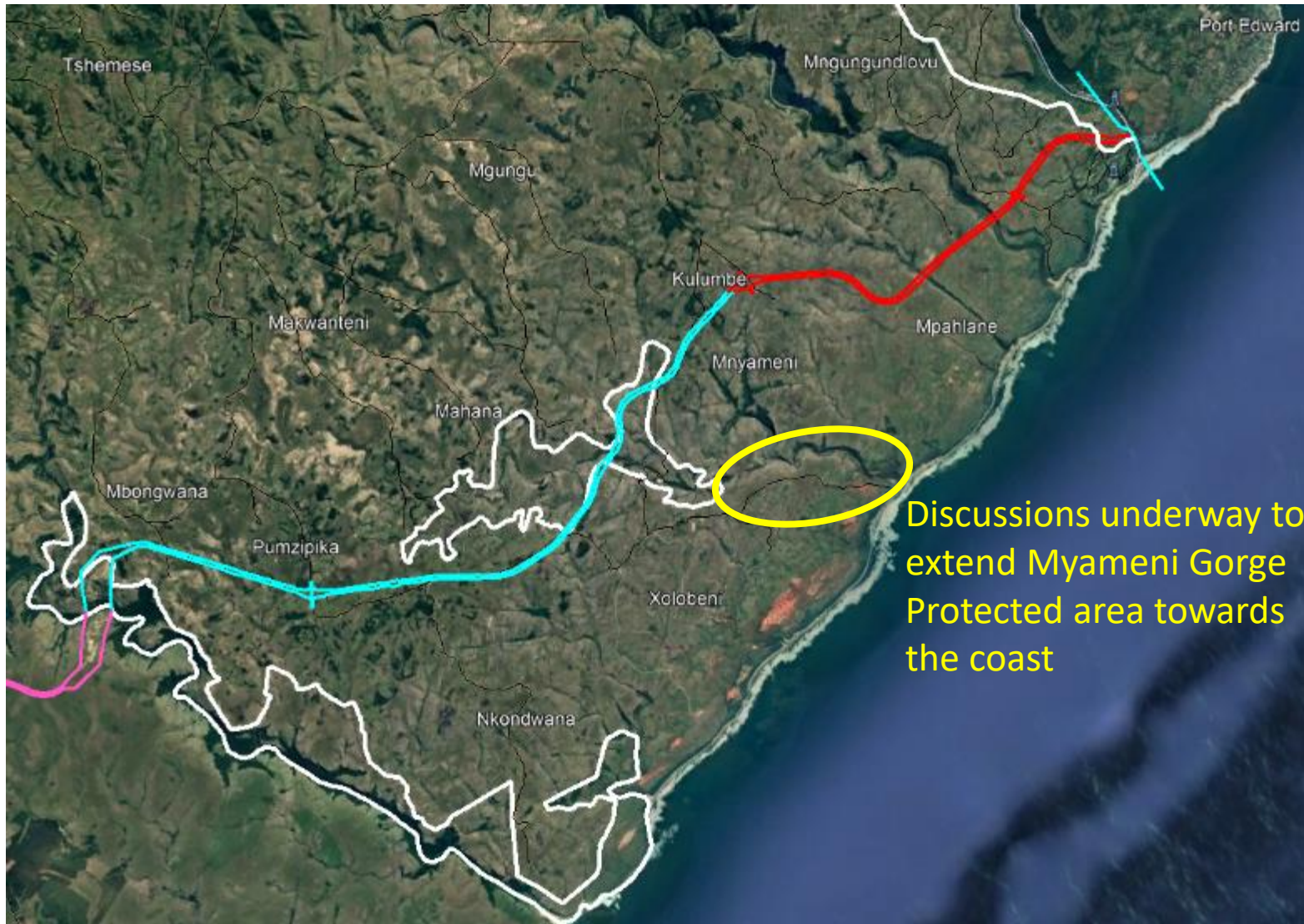
ADDRESSING ENVIRONMENTAL IMPACTS



- 'Avoid, Minimise and Mitigate' principle guides SANRAL
- The use of high level bridges across the Myameni, Kulumbe, Mphalane and Mzamba gorges ensures the road passes high overhead the sensitive vegetation within all gorges and minimises human access into the gorges (vs passes and low bridges).
- The design of bridges, culverts and drainage structures are all required to minimise potential negative impacts as part of their design. E.g. energy dissipating and flow spreading, stilling basins, etc.
- The strict Environmental management plans that are or will in place for all construction contracts can be seen to be effective on the Msikaba Bridge Contract (Ref. ECO and Auditor reports to the EMC)
- Biodiversity Offset Programme - Every 1km of the 80m wide N2 is mitigated by approx. 2km² of new protected area (80 000 m² footprint vs 2 000 000 m²)
 - In the Amadiba area this will see the creation of:
 - Mtentu Gorge/Gobodweni Community Nature Reserve
 - Myameni Gorge Protected Environment
- Search and Rescue of all Threatened Or Protected Species (TOPS) will occur ahead of all construction
- SANRAL road reserves are actually often sanctuaries of pristine natural vegetation

ADDRESSING ENVIRONMENTAL IMPACTS

Planned new protected areas under BoA



ADDRESSING SILTATION CONCERNS



- Siltation arising from the completed roads is a very low risk
 - All cut and fill slopes are rehabilitated and vegetation re-established to ensure minimal chance of erosion within the road reserve.
 - Stormwater and drainage design requirements ensure water running off from the road does not cause erosion
- The surfacing of a number of existing gravel local and provincial roads as well as the improvement of SW infrastructure for these roads will somewhat help reduce the current siltation load on local watercourses
- During Construction strict measures are required to be in place to minimise and monitor siltation including silt traps, upstream and downstream water quality monitoring on all crossings, etc.
- The upstream and downstream water monitoring results as well as historical aerial photographs unequivocally prove that the siltation at the Mtentu river mouth was not caused by the construction of the Mtentu Bridge but rather follows a natural historical cycle of building up over time until opened up again by a large flood event. Silt-up. Repeat.
- The current silt load in the Mthentu river as well as all other rivers across the Amadiba area all arise in their catchment areas from natural erosion exacerbated by various human activities such as illegal sand mining, crop farming, gravel roads, tracks and footpaths

ILLEGAL SAND MINING CONCERNS



This is a major concern shared by many Government, public and private bodies

- Illegal sand mining is a countrywide phenomena, particularly but not exclusively, in traditional authority areas.
- It is not a problem for only the Amadiba area nor is the Pondoland Centre of Endemism the only threatened biome.
- ***Sand mining needs to be understood as largely a socio-economic problem largely driven by desperation*** in the absence of many feasible alternative legal means of generating income in rural municipalities.
- To start sand mining requires a fairly low capital investment (price of a flatbed truck) and so is a relatively easy way for 'entrepreneurs' to start generating income and to employ a few persons with (unfortunately) relatively low risk
- There are many reasons why community leaders and residents either don't want to or can't stop the illegal theft of sand in their areas
- The minutes of the N2WCR ACC and EMC meetings shows that extensive time and effort is being spent by several parties on trying to address the problem.
 - There are already task teams and programmes in place.
 - And because of the sensitivity of the Pondoland Biome it is getting higher priority and greater attention

ILLEGAL SAND MINING CONCERNS 2



- The N2 construction activities together with future economic opportunities the road will bring will provide many and major legitimate alternative opportunities for entrepreneurs and work seekers
 - This will reduce the attraction or need to resort to illegal sand mining to generate an income.
 - Community, traditional and political leaders should be better able to discourage sand miners pointing out legitimate and legal alternative business opportunities now available.
 - Local public sympathy and support for sand miners because they created some of the only local jobs around should also diminish
- The opening up of several new quarries for construction will provide crusher dust as an alternative and legal sand source for the area.
- By only allowing Contractors to buy legally sourced sand SANRAL is already helping grow the few legal licenced and sustainable sources such as dredging of sand from the Umzimvubu River.
- Whether SANRAL build the approved route or the proposed alternative route sand mining will remain an issue that needs to be addressed by all parties
- With their strong community and environmental voice the ACC can help

ADDRESSING LOSS OF RANGELANDS



- The N2 road reserve is 80m wide. This is to ensure enough space to build a future double carriageway once/should it be needed.
- The 80ms also means SANRAL does not have to be too concerned about enforcing a setback line for buildings built close to the fenceline which is difficult to enforce in traditional areas as 80m ensures sufficient run-off/buffer space alongside the road for safety reasons.
- The N2 road reserve is only 80m wide.
 - The amount of actual grazing land actually lost by communities will be minimal and will not cause a shortage of grazing areas in the Amadiba area.
 - Numerous under and overpasses will ensure communities retain easy access to each other and to their grazing and other natural resource harvesting areas.
- The approved route being significantly shorter results in less area “lost” for grazing and other resource gathering activities than the alternative inland route

2. Ribbon Development Concern



- Ribbon development along the route
 - Land governance has collapsed in traditional areas
 - A lack of secondary routes and a desire for access to surfaced routes will lead to increased and unregulated settlement along the route
 - Leading to densification immediately adjacent the new road particularly close to towns
 - Over time this will lead to a loss of the high mobility benefit of the highway

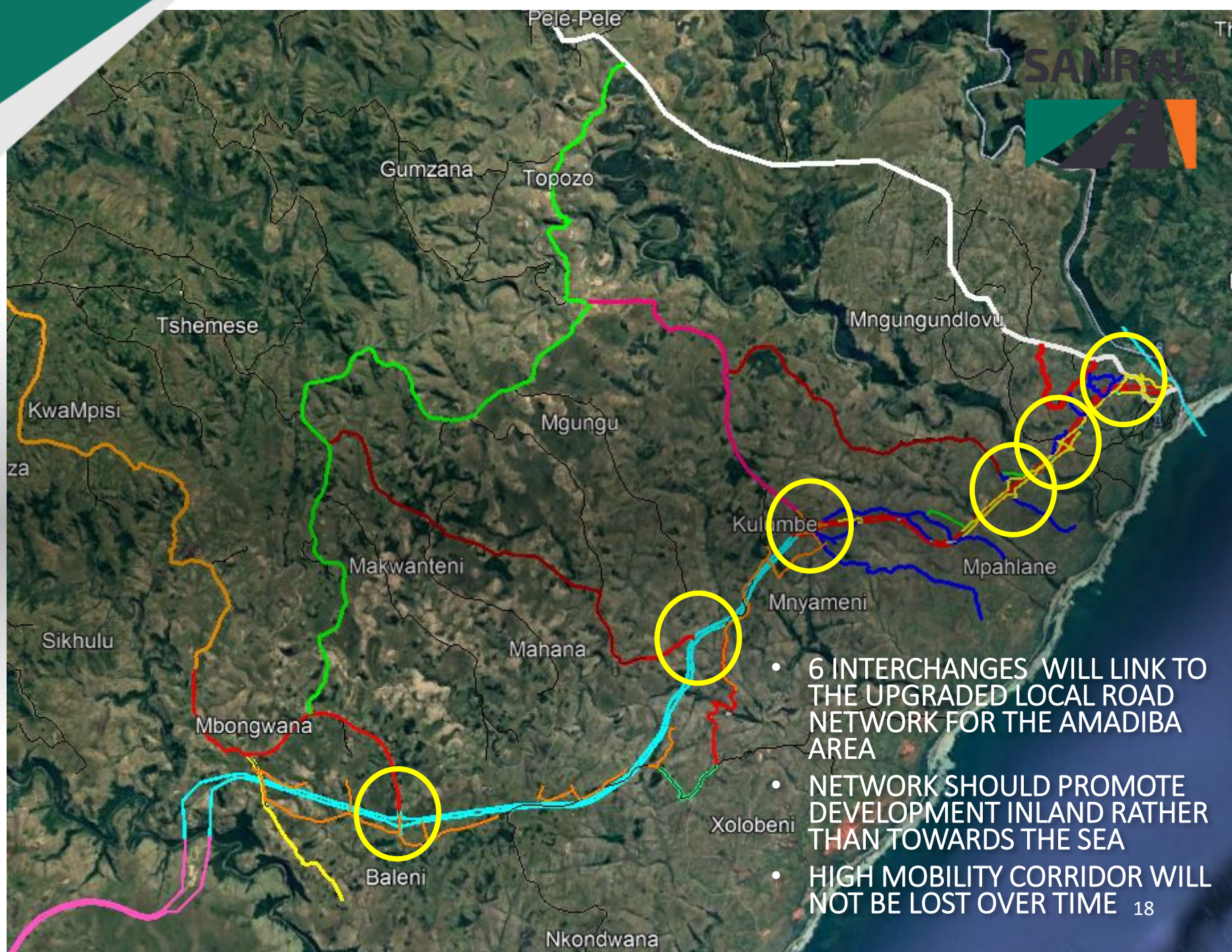
ADDRESSING RIBBON DEVELOPMENT



- Ribbon development was identified as one of the primary risks under the EIA
- Settlements immediately adjacent national roads are a huge problem for SANRAL particularly where people start taking direct access and/or cause pedestrian issues
- Learning from these problems and minimising this risk forms part of SANRAL's design philosophy for the entire greenfield route. This is being done by:
 - Not just building a highway but improving, expanding and upgrading local road networks.
 - Connecting these local networks to the new N2 at regular safe interchanges (not at-grade intersections)
 - Upgrading and surfacing alternate routes linking communities to the major towns (Port St Johns, Lusikisiki, Flagstaff and Mbizana)
 - Thus providing surfaced routes at an appropriate level of service (class 3 and 4 rather than class 1) to allow natural development along these routes rather than alongside the highway
 - Addressing current and future pedestrian and NMT patterns through walkways and sufficient under/overpasses along desire lines
 - Urging traditional leaders not to grant new RTO's next to the N2

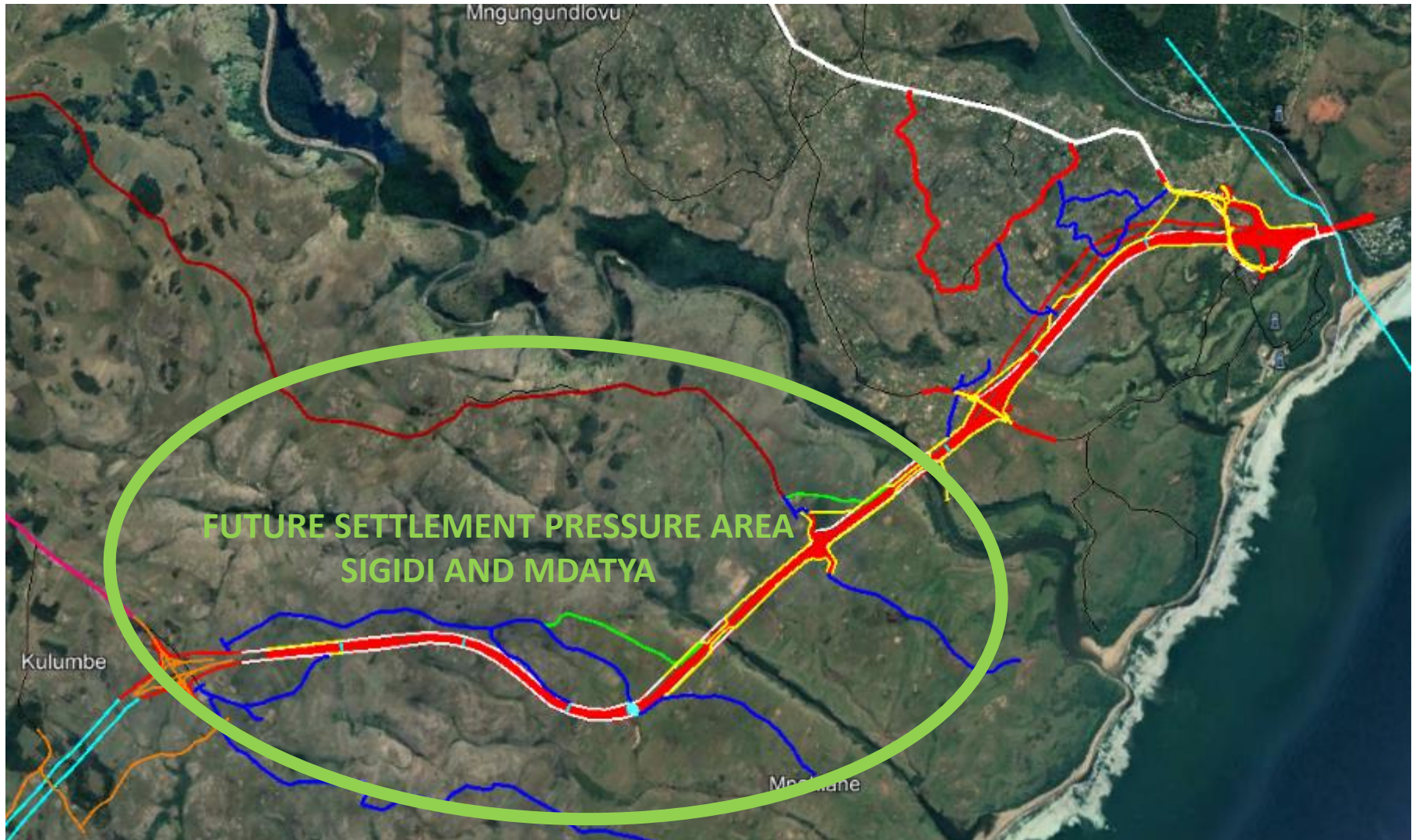
N2 WCR LINKED SECONDARY NETWORK DEVELOPMENT





- 6 INTERCHANGES WILL LINK TO THE UPGRADED LOCAL ROAD NETWORK FOR THE AMADIBA AREA
- NETWORK SHOULD PROMOTE DEVELOPMENT INLAND RATHER THAN TOWARDS THE SEA
- HIGH MOBILITY CORRIDOR WILL NOT BE LOST OVER TIME

ADDRESSING RIBBON DEVELOPMENT CONT

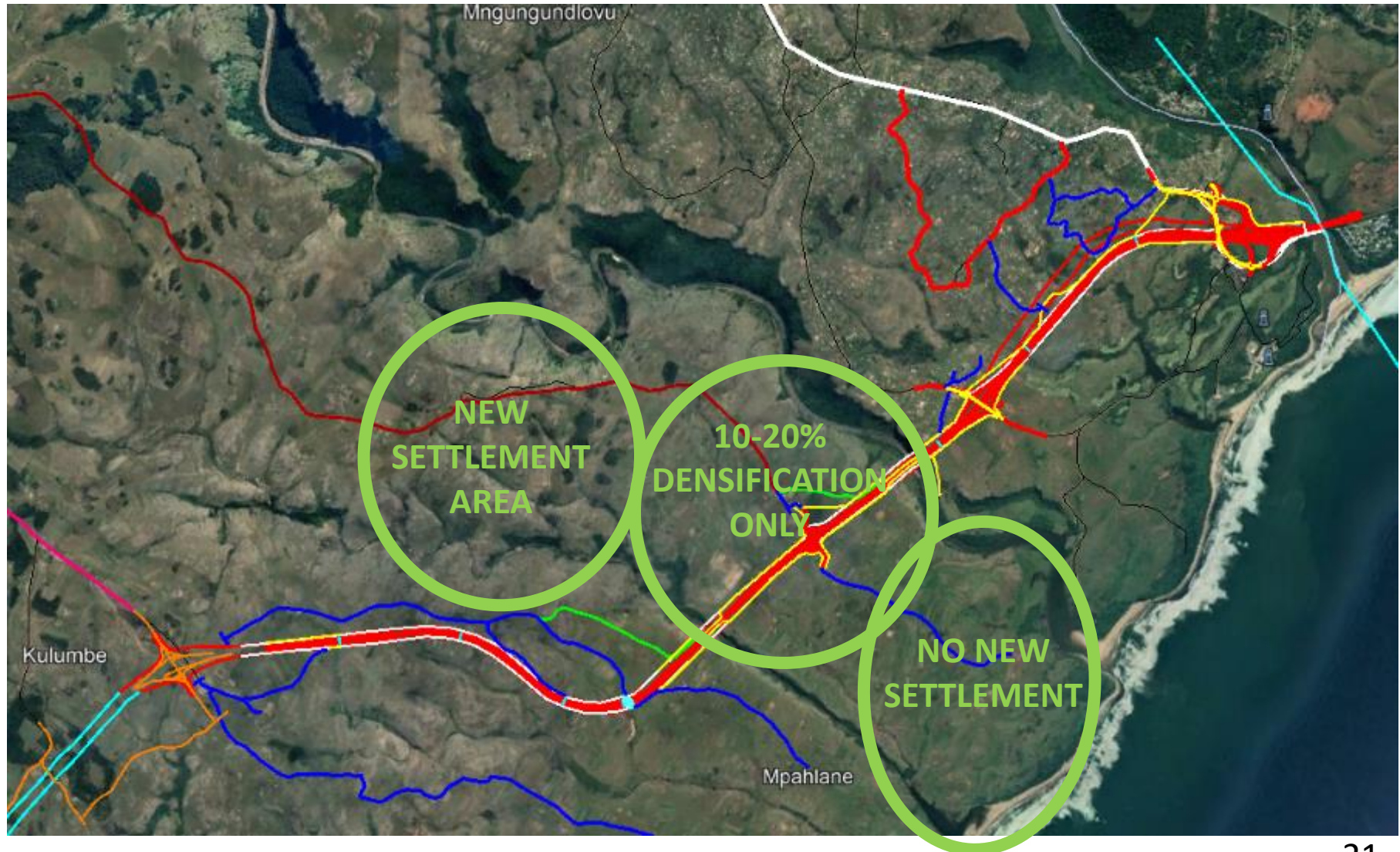


ADDRESSING RIBBON DEVELOPMENT



- Due to the proximity to Port Edward there will be a natural desire from persons, particularly those living on the northern edge of Lurholweni to move to the Sigidi – Mahaha corridor and potentially also around Mdatya once the road is opened in the next approx. five years.
- Similarly the surfacing of the Mbizana – Mbongweni – Baleni road will create another development focus towards Bizana.
- It is important for all relevant stakeholders i.e. municipality, Traditional leaders and these communities to discuss and plan for this eventuality:
 - The WMM Municipal Spatial Development Framework possibly needs to refine/further develop settlement plans for these nodes.
 - And/or Communities together with their traditional leaders and councillors could/should together make decisions on how many and where new residents will be accommodated, what areas will be kept strictly for rangeland, etc.
 - i.e. develop a ‘town plan’ for their village/areas
 - Adopt it by community resolution
 - Ensure these settlement plans are clearly communicated and known by all traditional leaders and residents.
- We will return to this issue under “way forward”

HIGH LEVEL EXAMPLE FOR SIGIDI



3. Limited Local Economic Benefit concern



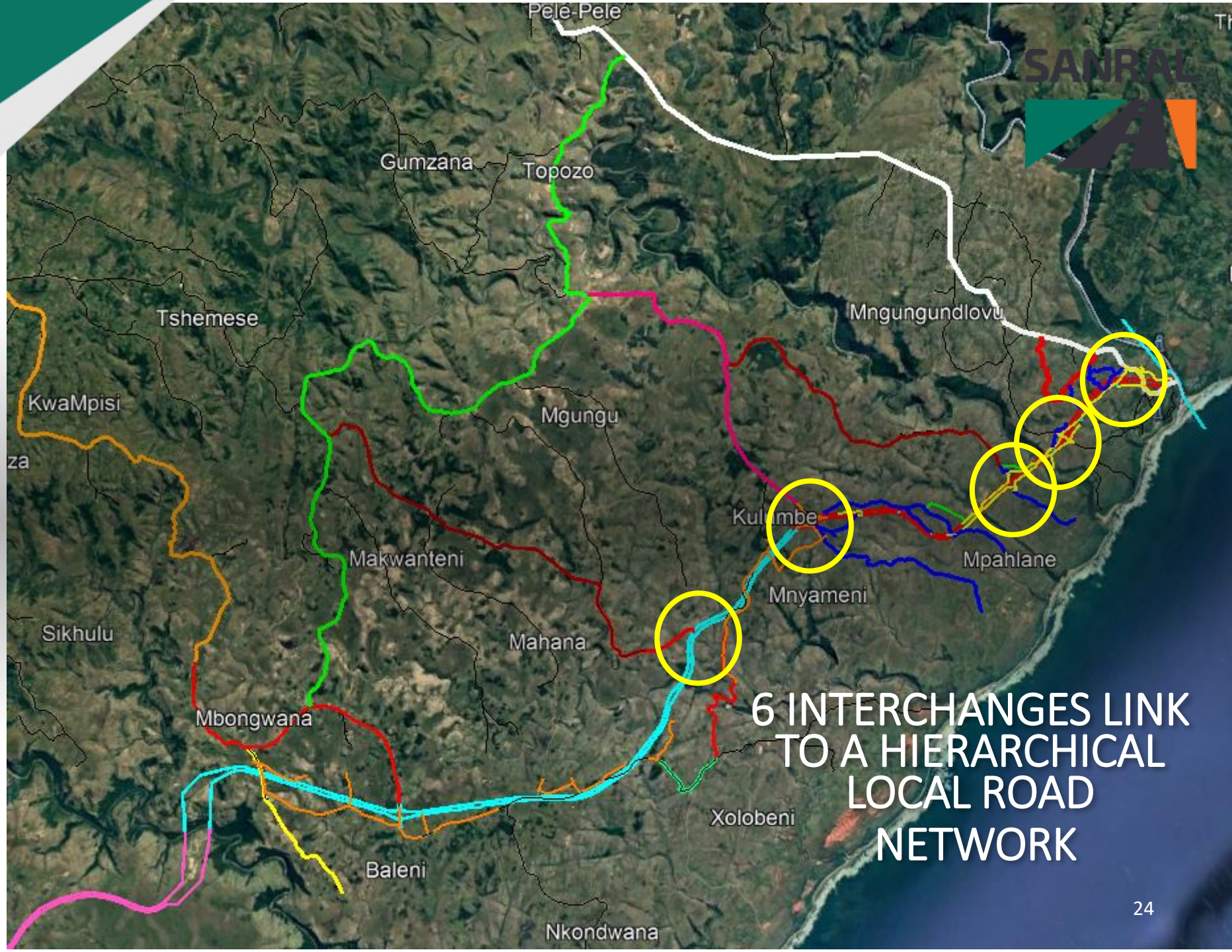
1. Limited local economic benefit

- Route does not serve the central villages of Amadiba
- Authorised route only benefits 'BMW drivers'

ADDRESSING LOCAL ECONOMIC DEVELOPMENT CONCERNS



- The new N2 will be a class 1 high mobility corridor serving
 - Regional and inter provincial freight (approx. 40% of vehicle numbers)
 - Regional and inter provincial vehicular traffic (Incl. public transport)
 - Inter and intra municipal local freight, public transport and vehicular traffic
 - (i.e. BMW drivers will only be a very small component)
- Through the strategic placement of interchanges and the development of the correct level of service/functionality local road network (i.e. class 3 (minor arterial) and class 4 (collector streets)) linking to these interchanges:
 - Local communities will be provided with an appropriate road network with the correct hierarchical levels of service and interconnectivity necessary for local economic and social development through
 - Access to markets and other economic opportunities
 - Access to and by social services e.g. ambulances
 - Access by tourists and other visitors
 - Lower transport costs and shorter travelling times
- Outside of the training of local labour, SANRAL will also be implementing skills and business training, support and mentoring for local entrepreneurs . (Pilot ABCD project underway in Lambasi & Vellum)



ADDRESSING LOCAL ECONOMIC DEVELOPMENT CONCERNS



- In terms of SIPDM requirements from National Treasury, all SANRAL capital projects are required to go through certain 'gateways' to confirm they are financially justifiable for funding.
- SANRAL utilises a sophisticated computer modelling programme known as HDM4 to calculate each project's life cycle Return on Investment (RoI). If a project does not achieve an 8% RoI it is not approved. (i.e. RoI must be > cost of borrowing the money).
- Due to it being an integrated greenfield project the nine N2WCR greenfield projects, 2 KZN R61 South Coast upgrades and the R61 Mthatha to PSJ were modelled as one integrated project with various alternatives (extent of dualling predominately). These were modelled against maintaining and upgrading the existing N2 and R61 routes
- The project is calculated to give an RoI of approx. 12% and even with a 20% cost increase as a sensitivity check it would retain a 10% RoI
- The 12% RoI is before any additional exogenous benefits such as local and regional economic growth are added
- i.e. 12 % RoI is just on the time and cost savings for road users alone

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- The map displays the Ntshongweni area in the Northern Cape, South Africa. It shows various towns and locations, including Maluti, Singisi, Rietvlei, and Ntshongweni. The map highlights several water supply packages and infrastructure, such as N00221EX-1, N00221EX-2, N00221EX-3, N00221EX-4, N00222N-1, N00222N-2, Package 1 through Package 7, and N00220E-1 (also Package 2). It also shows roads like R394 and R061, and a red circle around the town of Ntshongweni.

ADDRESSING LOCAL ECONOMIC DEVELOPMENT CONCERNS



HDM - 4

HIGHWAY DEVELOPMENT & MANAGEMENT

Economic Indicators Summary

Study Name: N2 Wildcoast

Run Date: 31-08-2021

Currency: SA RAND (millions)

Discount Rate: 8.00%

Sensitivity: Base Sensitivity Scenario

Alternative	Present Value of Total Agency Costs (RAC)	Present Value of Agency Capital Costs (CAP)	Increase in Agency Costs (C)	Decrease in User Costs (B)	Net Exogenous Benefits (E)	Net Present Value (NPV = B+E-C)	NPV/Cost Ratio (NPV/RAC)	NPV/Cost Ratio (NPV/CAP)	Internal Rate of Return (IRR)
Base Alternative	2,288.886	1,782.572	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Maintenance and upgrades	6,006.518	5,500.857	3,717.832	2,211.520	0.000	-1,506.112	-0.251	-0.274	-84.7 (2)
Alt 1 Non-Toll Prov-RRM	15,938.768	15,391.484	13,649.882	15,183.845	0.000	1,533.963	0.096	0.100	8.9 (1)
Alt 1 Toll Prov-RRM	16,309.942	15,332.051	14,021.055	15,603.802	0.000	1,662.746	0.102	0.106	9.3 (1)
Alt 1 Non-Toll Prov-Full Maint	19,075.416	18,571.145	16,766.529	25,667.017	0.000	8,891.288	0.466	0.478	11.7 (1)
Alt 1 Non-Toll Prov-Prov Maint	18,990.818	18,473.544	16,701.933	25,621.266	0.000	8,819.334	0.470	0.483	11.7 (1)
Alt 2 Non-Toll Prov-Prov Maint	19,111.981	18,594.778	16,823.084	25,743.489	0.000	8,920.395	0.467	0.480	11.7 (1)
Alt 3 Non-Toll Prov-Prov Maint	19,020.833	18,503.559	16,731.947	25,662.161	0.000	8,930.214	0.469	0.483	11.7 (1)
Alt 4 Non-Toll Prov-Prov Maint	19,141.996	18,624.793	16,853.111	25,784.383	0.000	8,931.273	0.467	0.480	11.7 (1)
Alt 5 Non-Toll Prov-Prov Maint	17,834.336	17,322.471	15,545.449	24,606.604	0.000	9,141.155	0.513	0.526	12.0 (1)
Alt 6 Non-Toll Prov-Prov Maint	17,864.351	17,352.486	15,575.465	24,727.499	0.000	9,152.034	0.512	0.527	12.0 (1)

Figure in brackets is number of IRR solutions in range -80 to +800

RoI Positive (~12%) for all alternatives even without any exogenous benefits (e.g. LED) added

Sensitivity: Cost Increase +20%

Alternative	Present Value of Total Agency Costs (RAC)	Present Value of Agency Capital Costs (CAP)	Increase in Agency Costs (C)	Decrease in User Costs (B)	Net Exogenous Benefits (E)	Net Present Value (NPV = B+E-C)	NPV/Cost Ratio (NPV/RAC)	NPV/Cost Ratio (NPV/CAP)	Internal Rate of Return (IRR)
Base Alternative	2,288.886	1,782.572	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Maintenance and upgrades	6,006.518	5,500.857	4,461.289	2,211.520	0.000	-2,249.770	-0.375	-0.409	-0.5 (2)
Alt 1 Non-Toll Prov-RRM	15,938.768	15,391.484	16,371.885	15,183.845	0.000	-1,187.820	-0.075	-0.077	7.4 (1)
Alt 1 Toll Prov-RRM	16,309.942	15,332.051	16,731.111	15,603.802	0.000	-1,047.310	-0.064	-0.068	5.9 (1)
Alt 1 Non-Toll Prov-Full Maint	19,075.416	18,571.145	20,144.247	25,667.017	0.000	5,523.571	0.290	0.297	10.0 (1)
Alt 1 Non-Toll Prov-Prov Maint	18,990.818	18,473.544	20,040.131	25,621.266	0.000	5,581.138	0.294	0.302	10.1 (1)
Alt 2 Non-Toll Prov-Prov Maint	19,111.981	18,594.778	20,185.539	25,743.489	0.000	5,557.950	0.291	0.299	10.1 (1)
Alt 3 Non-Toll Prov-Prov Maint	19,116.025	18,597.059	20,076.145	25,662.161	0.000	5,596.016	0.292	0.300	10.1 (1)
Alt 4 Non-Toll Prov-Prov Maint	19,141.996	18,624.793	20,221.557	25,784.383	0.000	5,582.827	0.291	0.299	10.1 (1)
Alt 5 Non-Toll Prov-Prov Maint	17,834.336	17,322.471	16,653.432	24,606.604	0.000	6,033.172	0.338	0.348	10.4 (1)
Alt 6 Non-Toll Prov-Prov Maint	17,864.351	17,352.486	16,689.448	24,727.499	0.000	6,039.051	0.338	0.348	10.4 (1)

Even with 20% additional cost RoI remains Positive (~10%)

CONCLUSION



- All of the concerns identified are legitimate and valid concerns.
- These risks and issues are however all known to SANRAL and other relevant stakeholders
- The environmental concerns are being addressed through appropriate ‘avoid, minimise or mitigate’ measures.
 - The sand mining problem is receiving attention from relevant authorities however the N2 construction projects can be used to encourage these miners to abandon these illegal activities for legitimate work by local leadership
- The ribbon development concerns are for the partially addressed by SANRAL’s development of interchanges and a secondary road network which will move all natural development and densification onto secondary roads and nodes linked to either the N2 or to the local major towns
 - However municipality, traditional leaders and communities, not just in WMM but also IH and PSJ, should look at their spatial development frameworks and timeously develop local ‘town plans’ for settlements likely to be affected by these future pressures
- The local economic development concerns are addressed through the development of an appropriate local/secondary Amadiba road network
- The route went through comprehensive economic benefit analysis and does not just serve and benefit “BMW drivers”

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Public Participation

Overview of the EIA process



- Authority pre-application meeting
- Submission of new application for authorisation and Plan of Study for Scoping
- Public announcement of new application and EIA process
- Audit issues and concerns raised in previous EIA study and appeal process
- Distribution of Background Information Document to Interested & Affected Parties
- Specialist input on alternative alignments
- Compilation and distribution of Draft Scoping Report
- Public announcement of availability of Draft Scoping Report for review and comment
- Host Public Meetings, Focus Group Meetings, imbizos, etc.
- Compilation of Final Scoping Report (with Comments and Responses Report) and submit to relevant environmental authorities

Overview cont.....



- Submit Plan of Study for EIA
- Update existing information
- Address key issues and concerns
- Re-do relevant specialist studies
- Peer review of draft specialist reports
- Integration of specialist studies, where appropriate
- Finalise specialist reports
- Compile and distribute Draft Environmental Impact Report (EIR)
- Public announcement of availability of Draft EIR for review and comment
- Host Public Open Days, Public Meetings, Focus Group Meetings, imbizos, etc.
- Compile Final EIR (with Comments and Responses Report) and submit to relevant environmental authorities for decision-making
- Compile and submit Draft Environmental Management Plan to relevant authorities

Public Participation Process (PPP)

- Notification of the Environmental Impact Assessment for the proposed project placed in national, regional and local newspapers
- A Background Information Document (BID) on the proposed project was compiled and distributed to over 3700 I&APs on the database in 5 and 6 August 2005.
- The BID was available in English, Afrikaans, isiXhosa and isiZulu

PPP during the Draft Scoping report

- The Draft Scoping report (DSR) was released for an 8-week public review period in April 2006.
- 13 public information sharing meetings were held at key centres along the route.
- Meetings were advertised in 17 local, regional and national newspapers and on 3 community radio stations & in the letter distributed to the 3 738 I&APs on the Project database at the time
- Pre-recorded radio announcements in isiXhosa and isiZulu were also used to target people in the rural areas of the Eastern Cape.
- The public review process also included 124 additional meetings in the form of authority meetings, focus groups, special interest group meetings and imbizos with rural communities.
- These meetings were arranged through contact with representatives of the organizations or institutions in question, invitation letters to people on the registered I&AP database from those sectors or towns being targeted, and liaison with ward councillors and traditional leaders.

PPP during the Draft Scoping report

- The meetings in the amaDiba Tribal Authority area were arranged in consultation with **Headman Kaliphile Baleni of the amaDiba AA & Headman Ndabazakhe Baleni of the Mgungundlovu AA as well as the various sub-headmen of the respective villages where the meetings took place including Sub-Headman Macikacika Bhele of Mdatya village and Sub-Headman Nawana Dlamini of Sigidi Village.**
- These traditional leaders all attended the meetings that they helped to arrange.
- Approximately 6 000 people attended these meetings in total.
- **The community in the Mgungundlovu Administrative Area, which includes the villages of Sigidi and Mdatya, submitted comments signed by Headman Ndabazakhe Baleni on 6 June 2006** during the DSR comment period.
- The submission indicated strong support for the N2 Wild Coast Toll Highway from the local community.

Alternative alignments workshop and site visit



- A number of alternative alignment proposals other than those assessed in the DSR were submitted by I&APs
- As it was considered important to assess the viability of all proposed alternative alignments a workshop was convened all the other I&APs who had submitted alternative alignments for consideration.
- The workshop was held at the SANRAL Offices on Tuesday 4 July 2006.
- A meeting was therefore arranged on Thursday 27 July 2006 in Harding
- **A site visit was conducted from 15 to 19 October 2006** was held to look at the new alignments that had been put forward by I&APs.
- This site visit was attended by representatives of SANRAL, the environmental consultant, social, botanical and economic specialists, DEAT, SANParks **and the I&APs who proposed the alternative alignments.**

Presentation at Meetings

- A standard audio-visual presentation on the DSR was given at all meetings.
- The presentation was available in English, isiXhosa and isiZulu.
- The presentation covered:
 - What is an EIA
 - History of the previous EIA, RoD, Appeals and the setting aside of the RoD
 - The new application and appointment of independent consultants
 - Purpose of the meeting and the process undertaken during the current Scoping
 - Description of the proposed project and improvements
 - A description of the anticipated impacts of the project
 - A description of the process for completion of the EIA, the issuing of the RoD,
 - Appeals process, final decision on the project, the intent to toll process and tender.

Final Scoping report(FSR) Distribution

- All interested and affected parties on the project database were informed in writing of the availability of the FSR in April 2007.
- This included the hand delivery of the letter of notification and executive summary to the FSR to all rural villages in the Eastern Cape and traditional councils in KwaZulu-Natal 75.
- The National Department of Environmental Affairs and Tourism accepted the Final Scoping Report and the Plan of Study for EIA on 22 May 2007
- All I&APs on the project database (10 139 at the time) were notified by letter in June 2007 of DEAT's decision and informed that the Impact Assessment Phase of the EIA would be commencing.

Review of the Draft Environmental Impact Report(EIR)

- The Draft EIR was made available for public review from Monday 10 November 2008 to Friday 9 January 2009.
- Adverts announcing the availability of the Draft EIR and the libraries where it could be viewed were placed in 22 national, regional and local newspapers.
- Pre-recorded radio announcements in English, isiXhosa and isiZulu were also used to target people in the rural areas of the Eastern Cape and KwaZulu-Natal who have limited access to newspapers.
- 9 538 I&APs on the EIA process database were sent a cover letter together with a copy of the executive summary to the Draft EIR.
- The Draft EIR was also made available on the CCA Environmental and SANRAL websites

Review of the Draft Environmental Impact Report(EIR)



- The Public Open Days were held at central locations along the route and transport was provided from outlying areas to the nearest Public Open Day venue.
- Venues for the Public Open Days were selected in consultation with the relevant traditional leaders and ward councillors for the area.
- **Venues at the Mahaha Junior Secondary School, Baleni Clinic and Wild Coast Casino, which served the communities in the AmaDiba area,** were chosen in consultation with Chief Lunga Baleni of the AmaDiba Traditional Authority.
- Contributions received during this process (and throughout the EIA process) were included in the comments and response tables

Review of the Draft Environmental Impact Report(EIR)



- A full colour information brochure was also produced in English / isiXhosa and English / isiZulu.
- The Basic Information Brochure provided information on the project, EIA process, the availability of the Draft EIR and where it could be viewed, the Public Open Days, the overall findings of the EIA and the way forward.
- It also contained a fold out map showing the route of the proposed project and the location of the Public Open Day venues.
- A total of 10 000 brochures were produced in English / isiZulu and 25 000 in English / isiXhosa.
- The brochures were distributed at voter registration stations throughout the study area on the weekend of 8 and 9 November 2008
- These were also distributed to ward councillors and traditional leaders of Traditional Councils in KwaZulu-Natal and Administrative Areas in the Eastern Cape

Aerial photograph showing the routes on display at Mahaha on 2 Dec 2008



Aerial photographs on display showing the route at Baleni on 3 Dec 2008



Review of the Draft Environmental Impact Report(EIR)



- The information that was displayed at the Public Open Days was in the form of posters in both English and the local language, either isiZulu or isiXhosa, depending on the location of the meeting.
- These posters highlighted both the positive and negative potential impacts of the proposed project and the recommended mitigation measures to reduce or eliminate negative impacts.
- These posters contained visual images, where possible, to illustrate the information that was being conveyed.
- Large aerial photographs were displayed which clearly showed the houses, schools, existing roads and local landmarks which enabled local people to locate the proposed project in relation to their own homes

Notification of the final EIR

- The Final EIR was made available for information purposes from Monday 8 March 2010 and a total of 17 157 I&APs on the project database were notified in writing and sent a copy of the executive summary to the Final EIR.
- This included the hand delivery of the letter of notification and executive summary to 3 743 people in rural villages in the Eastern Cape and traditional councils in KwaZulu-Natal.
- A full copy of the Final EIR together with a letter was distributed to all regional authorities.

Notification of the Record of Decision



- On 19 April 2010 the Department of Environmental Affairs issued a Record of Decision ("**ROD**") to SANRAL.
- Within 10 days of the issue of the ROD, a copy of the ROD was placed in all libraries and public venues along the proposed route.
- An advert providing notification of the ROD and appeal procedure was placed in all newspapers specified in the ROD (with the exception of the Wild Coast Herald which no longer existed).
- The notification was also announced on seven community radio stations throughout the study area
- All ward councillors of wards through which the proposed route passes were notified in writing of the ROD and appeal procedure by letters delivered by hand and through registered mail.
- Written notification was also sent to all 16 984 I&APs on the project database
- Hand delivery of letters to 3 743 people in rural villages in the Eastern Cape and traditional councils in KwaZulu-Natal.

Appeals



- Following the authorisation, there were 49 appeals lodged with the Minister of Environmental Affairs.
- All appeals were dismissed as not raising anything new or substantive not already considered and the decision by the Department of Environmental Affairs was upheld.

Legal challenge

- Sinegugu Zukulu vs Min. DEA et al
 - Case brought by Zukulu, Amadiba Traditional Authority, Kimbili property Association, Baleni, Madatya and Sigidi communities
 - Sought to overturn the Environmental Approval for N2WCTH
 - All applicants except Zukulu withdrew
 - Case was heard in Pretoria High Court in December 2018
 - Application was dismissed on all grounds 07 March 2019
 - In her Ruling the judge wrote that the N2WCTH public participation process followed by SANRAL was likely the most comprehensive public participation process ever carried out in South Africa to that date and that “[t]here was no indication at any stage by any party that the public participation process was contravening customary law”
 - Judge also ruled that “it is clear that all the relevant alternative routes were identified, investigated, assessed and considered as required”
- Application for Leave to Appeal denied on 23 April 2019
- Application for Leave to Appeal made to SCA in June 2019 and although granted was never pursued.

Public Involvement during construction



- PLCs
- Biodiversity Offset Committees
- Land acquisition meetings
- Stakeholder engagements/community meetings

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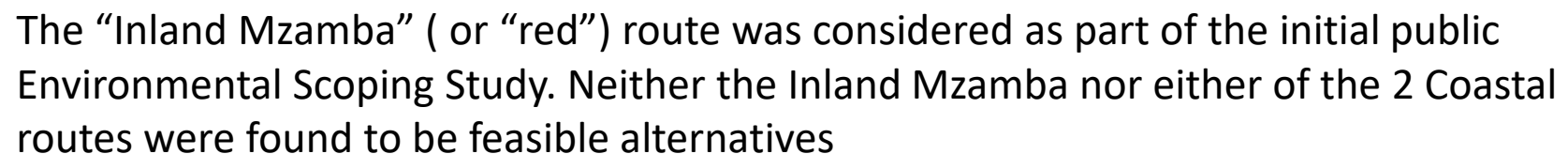


ANALYSIS OF THE ALTERNATIVE INLAND ALIGNMENT

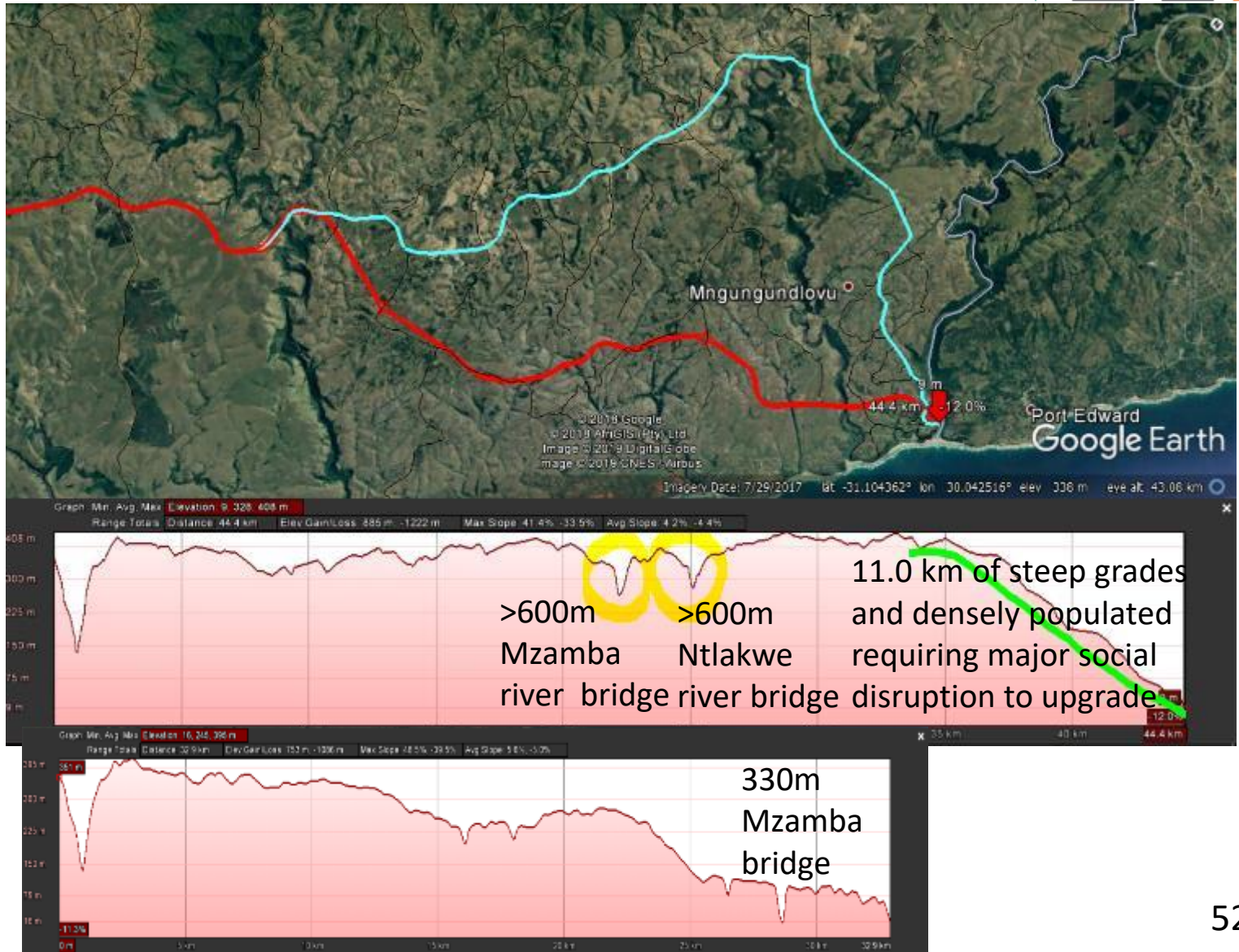
ALTERNATIVE INLAND ALIGNMENT



- Inland Mzamba Alternative in 2007 scoping Study
- Inland Mzamba vs AIR routes
- Compromises required in Horizontal and Vertical alignment for AIR
- Consequences of these compromises



INLAND MZAMBA NOT A FEASIBLE ALTERNATIVE – not taken to full EIA





ALTERNATIVE INLAND ROUTE Vs. INLAND MZAMBA



- Inland Mzamba
 - 100-120km/h high mobility road
 - Requires two 500m+ bridges across the Mzamba and Ntlakwe river valley = major additional cost
 - Requires major upgrading of the R61 through Lurholweni = major additional cost and major social disruption due to required relocation of several hundred families
- Alternative Inland Route (AIR)
 - Very similar horizontal route to Inland Mzamba but
 - Goes around rather than through several wetlands
 - Requires '15,5 km' of 60km/h sections
 - To avoid the huge additional cost of 2 very expensive major bridges AIR proposes two steep (60km/h) passes and lower, shorter bridges across Mzamba and Ntlakwe river valleys
 - To avoid the fatal flaw of the unacceptable social impact costs of massive relocations, AIR proposes no major upgrading to the existing 11km of R61 through Lukholwezi. Only minor safety improvements like pedestrian bridges and speed calming

ALTERNATIVE INLAND ROUTE

Compromised vertical alignment - Two passes



- Crossing the Ntlakwe and Mzamba river valleys requires 2 passes back to back totalling 8km
- Maximum grades ranging from 8% to 10%
- (Anything over 5% grade for mobility and freight routes is considered 'steep')



ALTERNATIVE INLAND ROUTE

Compromised alignment and cross section – R61

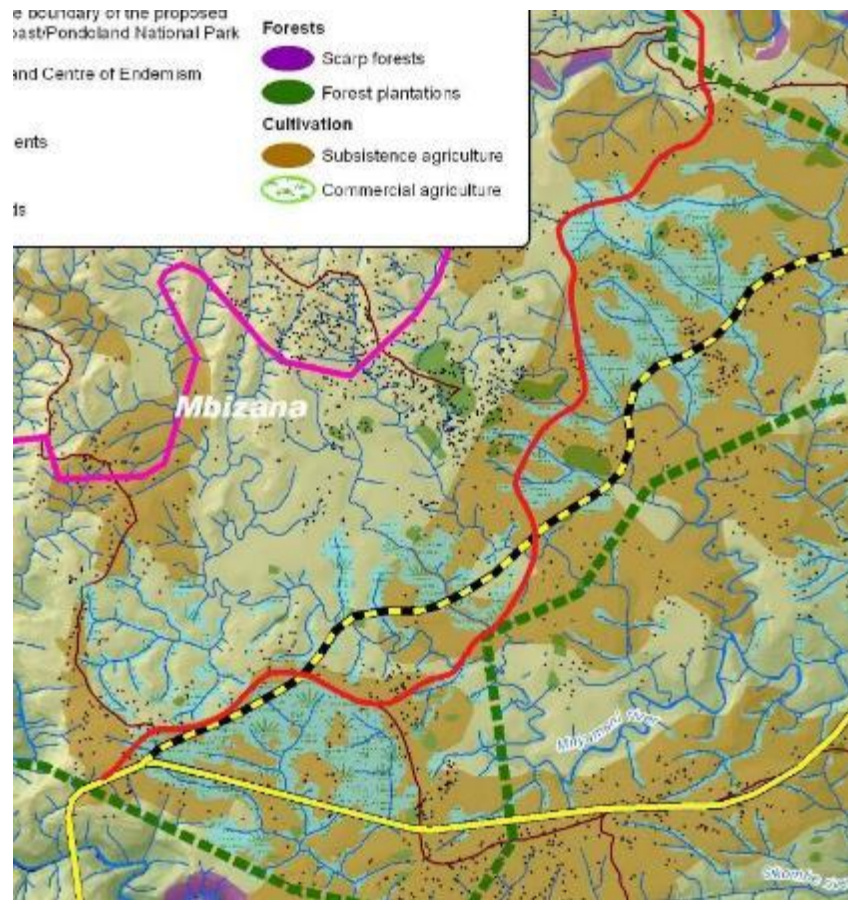


- Of the 19km along the current R61 alignment 11 km passes through the Lurholweni informal settlement @ 60km/h
- Incl. approx 10km of steep grades ranging up to 9% with limited existing climbing passing lanes and no descending passing lanes.
- No space to widen the road within existing Road reserve
- Several horizontal and vertical curves are 60-80km/h max.
- Many cross traffic turning movements due to numerous at-grade intersections and direct accesses that will remain
- Heavy pedestrian traffic both alongside and crossing will remain
- Local public transport route with Taxi's frequently stopping to pick-up and drop passengers along virtually the entire length will remain



ALTERNATIVE INLAND ROUTE

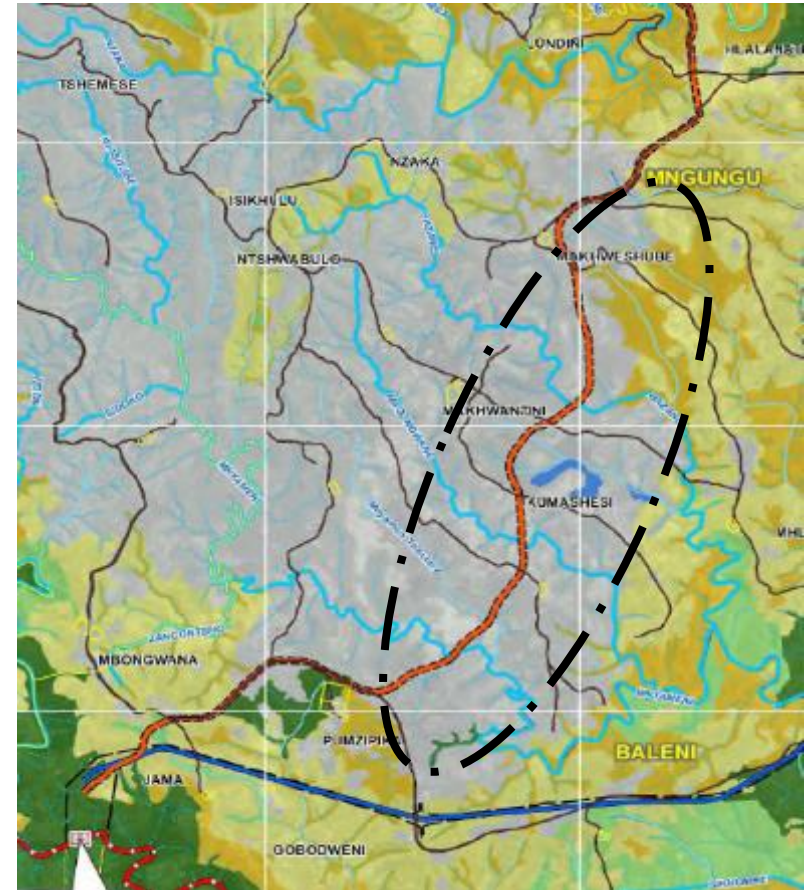
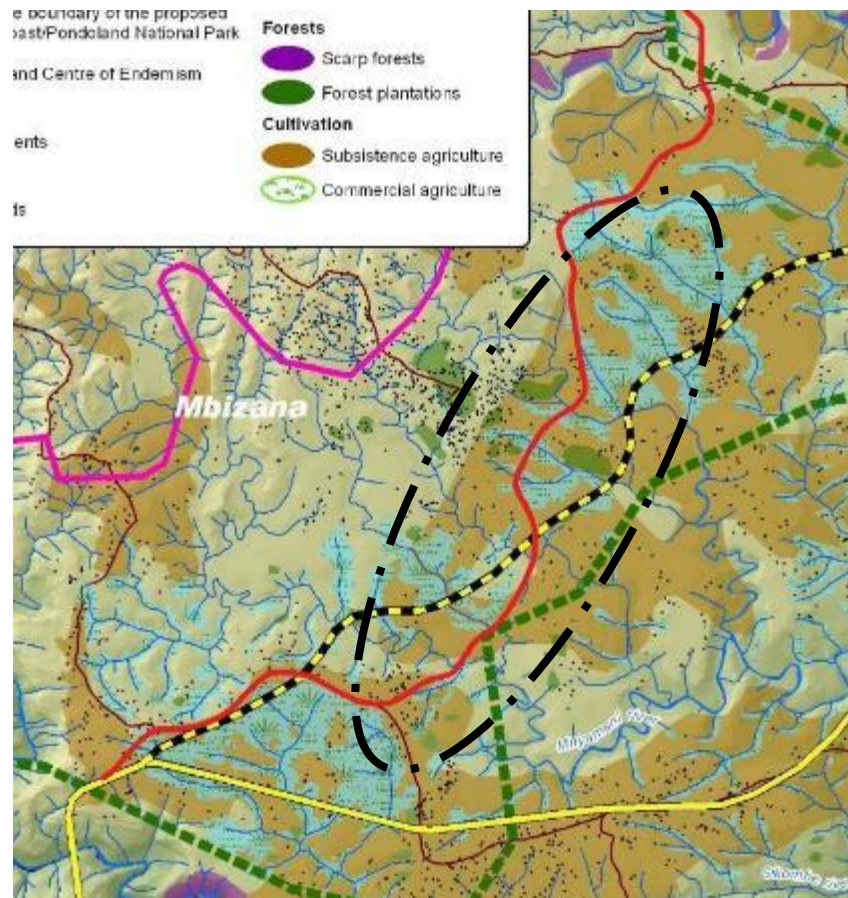
Compromised horizontal alignment through wetlands



- Route twists and turns to try avoid wetlands where possible = 100km/h alignment only
- Route appears to still cross 6 major and smaller wetlands
- Route runs immediately alongside several additional major wetlands
- Route runs mostly upstream not downstream of wetlands
- Alignment cannot be straightened to achieve 120km/h without impacting the wetlands it is trying to avoid
- Extensive work required to cross and/or safeguard these wetlands

ALTERNATIVE INLAND ROUTE

SANBI map missing information on several km of AIR



- This is not 16 km of “other” but 16 km of “no information provided” by SANBI on the environmental sensitivity of several wetlands and forest patches lying within the Pondoland Centre of Endemism (Pink line on RH map)
- The sensitivity comparison made to the SANRAL route is therefore incomplete

ALTERNATIVE INLAND ROUTE

Effect of compromised alignments



- Mzamba and Ntlakwe River passes
 - Safety = Negative
 - Travel Time & cost = Negative
 - Construction Cost = minimal advantage
- Heavy vehicles will only be able to travel 30-40km/h over most of the 8km
- Requiring passing lanes for almost entire lengths of uphill and downhill (i.e. 8km of 4 lanes required in steep terrain = major additional cost).
- Where 60 to 80 km/h speed restrictions are in place on high mobility routes in SA smaller vehicles tend to exceed the speed limit. Large speed differentials between heavy and light vehicles = major accidents
- Steep and twisting passes = major accidents
- The RMTC estimates that every fatal crash costs the SA economy over R17 million (2022 = 10 611 fatal crashes costing R188.13 billion) and every major crash costs the economy over R 1 million

ALTERNATIVE INLAND ROUTE

Effect of compromised alignments



- 11km of 60km/h through Lurholweni
 - Safety = Negative
 - Travel Time & cost = Negative
 - Construction Cost = Only Positive
- Many heavy vehicles will only be able to travel 40-50km/h
- Already have clashing class 2 (Major arterial) and class 4 (Collector street) road functions (80+km/h and 50km/h)
- 40% of fatalities on SA roads are pedestrians and this section of road has a very high pedestrian count
- The problem of crossing pedestrian movement cannot be solved using elevated pedestrian bridges – they simply do not work
- N2 Port Shepstone to EC is being upgraded to 100-120 km/h
- Current Lurholweni R61 cannot safely carry additional N2 traffic
- Lurholweni R61 cannot safely function as a combination class 1&4 road
- To add the additional N2 traffic onto the existing R61 through Lurholweni without major upgrading to address these known safety issues could be viewed as professionally and ethically negligent

ALTERNATIVE INLAND ROUTE

Effect of compromised alignments



- EIR route vs Approved Route Travel Time light vehicles
(Approx. values for demonstrative purposes)

Speed Light vehicle	Distance Approved route	Time	Distance AIR	Time
60 km/h	0 km	n.a.	11km	11 min
80 km/h	1 km	0,75 min	8 km	6 min
100 km/h	2 km	1,2 min	15 km	9 min
120km/h	28 km	14,0 min	11 km	5,5 min
Totals	31 km	16 min	45 km	32 min

- Using the DoT Dec22 R 4.92/km rate for a 1.8l vehicle and R500/day for a driver to approximate costs, the additional cost per light vehicle to utilise the EIR would be approx. R 86.00 (this is an underestimate)
- X 1440 light vehicles/day x 365 days = R 45 million p.a. direct additional cost to the economy

ALTERNATIVE INLAND ROUTE

Effect of compromised alignments



- EIR route vs Approved Route Travel Time for Heavy vehicles (Approx. values for demonstrative purpose)

Speed heavy vehicle	Distance Approved route	Time	Distance AIR	Time
40 km/h	0 km	n.a.	6 km	9 min
50 km/h	0 km	n.a.	8 km	9,6 min
60 km/h	1 km	1 min	5 km	5 min
80km/h	4 km	3 min	15 km	11,25 min
100km/h	26 km	15,6 min	11 km	6,6 min
Totals	31 km	19 min	45 km	42 min

- Using R 1,600/ day plus R 18.00/km for a 20 ton truck and R650/day for a driver (<https://www.jhbtruckhire.co.za/Truck-Hire-Rates.jma>) * 80% to approximate actual costs, the additional cost per heavy vehicle to utilise the EIR is approx. R 290.00
- X 960 heavy vehicles/day x 365 days = R 102 million p.a. direct additional cost to the economy

ALTERNATIVE INLAND ROUTE

Conclusion



- Entire AIR route
 - Safety = Big negative
 - Without a major upgrade the current R61 through Lurholweni as well as the steep Mzamba and Ntlakwe River passes will become accident hot spots. Most of the fatalities can be expected to be locals
 - Every fatal accident = R17 million cost to the economy
 - Because we have an approved and significantly safer alternative route it should be recognised as morally and professionally unacceptable to add the anticipated additional N2 traffic to the current R61 through Lurholweni without significant upgrading
 - Travel Time & cost = Big negative
 - AIR route doubles travelling time and will cost the economy well over 4 billion rands over a 30 year life cycle
 - This would drop the N2WCR RoI by approx. 1 to 1.5%. While the overall RoI should remain above the minimum 8% the margins becomes slim particularly if construction costs come in significantly higher than allowed for in the HDM4 calculations.

ALTERNATIVE INLAND ROUTE

Conclusion



- Entire AIR route cont/
 - Construction Cost = Relatively small advantage heavily outweighed by the additional consequential costs
 - Environmental
 - Requires more information for the AIR's 16km through wetlands to compare so probably not as advantageous as claimed
 - Full new Environmental Impact Assessment would be required in order to construct the AIR
 - Significant time delay to conduct all the necessary specialist studies
 - Due to the major negative social impact within Lurholweni (safety) the AIR will not compare well with the alternative currently approved route and thus may well not be authorised
 - A New EIA opens up a huge risk of new appeal process and court challenges indefinitely delaying the project
- AIR is clearly not a viable alternative route
- We rather have to consider and try resolve or mitigate stakeholders concerns with the current approved route

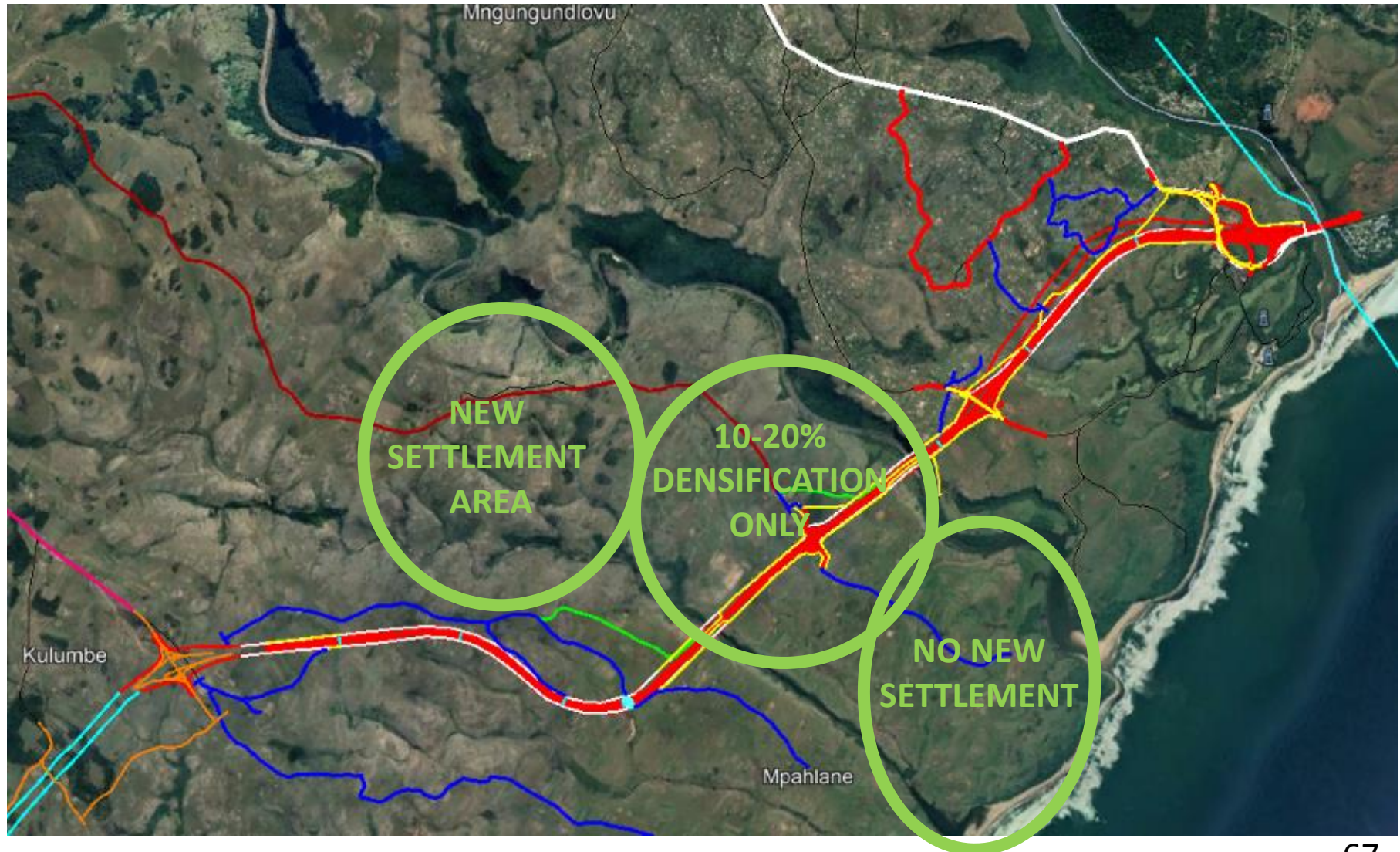
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WAY FORWARD

- SANRAL recognises that stakeholders have legitimate and valid concerns
- Many of these concerns are shared by SANRAL and we have been and will be taking measures to avoid, minimise or mitigate these concerns
- SANRAL proposes to:
 - Acknowledge and address these concerns through public and stakeholder meetings and information sharing in the Amadiba area
 - Explain to stakeholders that we have studied the AIR proposed by the ACC but that it is unfortunately not viable as an alternative
 - Explain how SANRAL will be also be improving the local Amadiba road network to improve access and create mobility loops within the Amadiba area and the benefits this will bring
 - Help extend the Myameni gorge protected area and finalise the proclamation of both Myameni and Mthenthu Gorge by ECPTA
 - Gobodweni Community Nature reserve
 - Work with the ACC, traditional leaders and WMMLM to creating settlement development plans for all Amadiba villages along the N2WCR particularly Sigidi and Mdatya and help have these adopted by each village, incorporated into the WMMLM SDF and implemented by all traditional authorities. (A win for the ACC?)

HIGH LEVEL EXAMPLE FOR SIGIDI



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THANK YOU



