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**To: Mr Jack van der Merwe  
The Chairperson  
ITMP25 Steering Committee**

**Date: 18 September 2013  
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**cc: Phumelelo Zikalala  
Email: [phumeleo.zikalala@gauteng.gov.za](mailto:phumeleo.zikalala@gauteng.gov.za)**

Dear Sir

**DRAFT GAUTENG 25-YEAR INTEGRATED TRANSPORT MASTER PLAN:**

**COMMENT SUBMISSION**

We represent the following company and organisations:

- iProp Limited (iProp) ([www.iprop.co.za](http://www.iprop.co.za)) the owner, investor and developer of extensive areas of centrally located land in Johannesburg;
- SOJO Business and Tourism (SOJO) ([www.sojo.co.za](http://www.sojo.co.za)) a non-profit organisation established in the south of Johannesburg to promote tourism and related business in recognition of the many economic opportunities that exist in the natural and man made tourism, recreation, and sporting facilities located in the south of Johannesburg and Soweto; and
- KlipSA (Klipriviersberg Sustainability Association) ([www.klipsa.org.za](http://www.klipsa.org.za)) a community-based voluntary association and registered Non-Profit Organisation established to protect, promote and enhance the value of the natural assets in the southern areas of Johannesburg through appropriate sustainable social and economic development.

We wish to thank you for the opportunity to participate and be involved in the development and preparation of the Gauteng 25-Year Integrated Transport Master Plan (ITMP25) following the release of the draft document for comment. Our submission is founded on projects, programmes and initiatives currently undertaken by iProp, SOJO and KlipSA.

The focus of these projects, programmes and initiatives is to attract and secure social and economic development that will protect, promote and enhance the value of the natural assets and biodiversity in the southern areas of Johannesburg and Ekurhuleni as well as the northern areas of Midvaal. The overall project is known as Klipriviersberg Economic and Ecosystem Development Zone (KEEDZ) and has been incorporated into and supported by the Johannesburg GDS2040 and subsequent IDPs. Support and interest is being realised through on-going discussions and engagement with a wide range of stakeholders.



It is not possible to provide a full insight into the nature and potential of the KEEDZ projects, programs and initiatives in this submission thus we request the opportunity to discuss the details with you and your project team to provide greater understanding of the initiatives which are supported by authorities, business and community representatives.

For ease of reference, copies of submissions made which detail the proposals for the future development philosophy and approach for this area are available from the KlipSA website ([www.klipsa.org.za](http://www.klipsa.org.za)).

## 1. General comments and observations

### *A new development and investment approach*

- 1.1. In reviewing the initiatives and projects, we wish to note our concern that it would appear that the majority of the capital projects and operational focus are in the areas between central Johannesburg and Tshwane. While we recognise and accept that future spatial development will be looking to concentrate and densify these areas we believe that the existing unemployed and lower income residents of the province are not being given an equal opportunity of access to improved and equitable mobility in the transportation value chains and therefore economic and social opportunities.
- 1.2. We believe that the majority of the poor and unemployed communities are located extensively in areas to the south of the east-west corridor of mine-impacted areas. It is therefore of concern that the economic and spatial development forecasts and scenarios promote extensive investment and growth in formal job creation to the north of the corridor and not to the south where the need is greatest. A similar level of investment and development in transportation networks towards the north adds to the disenfranchisement of the poor and employed communities in the south.
- 1.3. The focus of KEEDZ is to address food security, unemployment and inequality of the majority of poor communities in the southern areas using the agricultural potential of the Klip River and its associated tributaries and catchment areas. The primary focus is the use of the areas to stimulate a primary agricultural value chain with the establishment of agricultural activities and be located close to where poorer communities are already living. These activities should address local food security requirements, offer high employment opportunities, produce high yielding product as well as protect, promote and enhance the biodiversity value of the area through modern organic and biodiversity friendly methods and technologies.
- 1.4. This is expected to stimulate the associated up and down stream secondary industrial, commercial and logistics services and goods which should be located in formal employment and development corridors and activity spines along the N1/Golden Highway and R59/Meyerton and stimulate economic growth to support the establishment of intensified development nodes in Ennerdale and Blockhouse.
- 1.5. The economic sector for agricultural and related uses will stimulate and integrate the tourism sector by providing opportunities for ecotourism and agritourism goods and services. It is envisaged that this will evolve into an intense agriculturally based urban economic hub to be called the "Klipriviersberg Agritropolis".
- 1.6. The Klipriviersberg Agritropolis will provide an opportunity for bringing social and economic development close to where people are living to reduce their time and cost of accessing formal employment opportunities by promoting alternative transportation modes. This intervention will also achieve the creation of an economically and socially functional development zone with integrated transportation and ecological infrastructure for agricultural, recreational, biodiversity and aquifer management purposes.



### *Mine impacted areas opportunities*

- 1.7. Mention is also made of the large proportion of mine impacted areas concentrated in the mining belt between Randfontein and Springs. This corridor of land has been undergoing reclamation, rehabilitation and redevelopment for several decades led by iProp (formerly (RMP Properties). Project Hloekisa was conceptualised and incorporated into the Johannesburg and Ekurhuleni Integrated Development Plans (IDP) with a view to providing further opportunities for long-term economic and social opportunities and improving environmental quality through the length of the corridor
- 1.8. The recent private sector capital investment of R400m in pipeline infrastructure and networks will ensure the long-term reclamation of land through the corridor. This clean-up and rehabilitation for the redevelopment of these areas is a unique opportunity for the Gauteng City Region (GCR) and will contribute to the containment of urban sprawl by promoting compaction, densification and infill development along the length of the corridor.
- 1.9. This east-west development corridor and its associated development nodes will also provide employment opportunities and job creation to the majority of poor and unemployed communities located to the south of the corridor. This will be achieved through improving their accessibility to an integrated transportation infrastructure thereby improving the viability of public transportation and encouraging the use of non-motorised transport.
- 1.10. We therefore support the call for bold and persistent policy changes that will also encourage social and economic development close to where people are living to improve their quality of life and living conditions by improved accessibility to opportunities.

### *Environmental considerations and opportunities*

- 1.11. In terms of sustainable benefits and outcomes, mention is made of "preserving and restoring environmental and ecological systems". However, throughout the report there is no specific section or intervention regarding environmentally focused measures to be taken in this transportation strategy and implementation plan.
- 1.12. We strongly recommend that a specific section is prepared regarding the protection, promotion and enhancement of biodiversity and environmental value, assets and infrastructure through programs and mitigating measures to avoid, minimise, restore and use biodiversity offsets for residual impacts.
- 1.13. If we are claiming to provide a better future for ourselves and our children and an attractive destination for foreign investment and tourism, the environmental and biodiversity interventions should be taking a much higher priority and should be mainstreamed into the strategic planning and operational management of our integrated transport master plan. At this stage, this critical dimension of sustainability is totally inadequately addressed and considered.
- 1.14. We request the opportunity to discuss these environmental and development interventions to ensure optimal contribution to the future social and economic development of the GCR and its associated transportation and ecological infrastructure networks.

## **2. Intervention 1: Subsidised housing provision within the urban core areas**

- 2.1. While we recognise the importance of promoting the accommodation of poorer communities on well-located land parcels close to public transport facilities, we also



believe that the promotion of the development of economic activities close to where existing poorer communities are already resident is just as important.

- 2.2. In this way, bringing jobs to where people are living will assist in reducing the need for the movement of people and associated transportation services. It will also promote improved access to economic growth, skills development and job creation of those who are less able to afford transportation. In addition, alternative modes of transportation, including non-motorised transport can be promoted.
- 2.3. Elements of the development and investment approaches noted above will support the purpose and intentions of this intervention by promoting higher density living and improving accessibility to transportation systems.

### **3. Intervention 2: Land-use densification in support of public transport**

- 3.1. We strongly support the need to contain urban sprawl through infill development, densification and the redevelopment of older urban areas characteristically found in the southern areas of Johannesburg. In this regard, we have established a partnership with the School of Architecture and Planning of the University of the Witwatersrand and City of Johannesburg to embed students in a city studio in the Rosettenville area for a 3 year period.
- 3.2. This project is aimed at understanding the social, economic and environmental dynamics with in this spatial context with a view to informing the policies and implementation for the redevelopment, rehabilitation and upgrading of a declining urban area.
- 3.3. KUBiC (Kliprivier Urban Biodiversity Corridor) is a project launched with KlipSA and SOJO as partners in 2012. This project has a specific purpose to establish a biodiversity rich corridor along 12 km of Klipriver Drive southwards from Booyens. Integrated into this corridor will be improved public and non-motorised transport services and facilities to support the Johannesburg initiative for the establishment of "Corridors of Freedom" to increase densification of development and improve accessibility to and viability of public transport.
- 3.4. This project will also be incorporated into the Turffontein Development Corridor Strategic Area Framework currently being prepared by the city of Johannesburg.

### **4. Intervention 3: Reinforcing the passenger rail network as the backbone of the transport system**

- 4.1. We support the recognition of the need to reinforce the passenger rail network to be the backbone of the transport system. This is particularly important in the East West Development Corridor along the mine-impacted areas where the intensification of the reclamation and redevelopment of these areas will support the achievement of many of the spatial, economic and social goals.

### **5. Intervention 4: Restructuring and extending the integrated rapid and road-based public transport networks**

- 5.1. We support the concepts and principles regarding the identified "Red", "Blue" and "Green" "Networks" as identified. Of particular focus and importance is the need to open up opportunities for promoting the different modes of transport and the alignment of urban development, densification and accessibility to different areas of residential, employment and recreational use.



- 5.2. Our KUBiC project noted above should be recognised as part of a key corridor of the "Blue Network" planned along Klipriver Drive offering integrated public transport and non-motorised transport facilities linking economic and residential Transit Orientated Development (TOD) nodes.
- 5.3. A number of nodes have been identified by SOJO in the southern areas of Johannesburg for the establishment of City Improvement Districts (CID). A programme for the establishment of these CIDS has been initiated and in time will include areas along the Klipriver Drive initially focusing on Booyens node at the northern end and the Panorama/Klipriviersberg node at the southern end.

## **6. Intervention 5: Strengthening freight hubs**

- 6.1. Regarding the establishment of intermodal terminals by Transnet on the periphery of Gauteng, we would like to understand the evidence used to support the establishment of periphery located intermodal freight hubs as being more efficient and effective than an integrated urban network of intermodal facilities. We would suggest that greater rail efficiency would be achieved through its linear connectivity rather than spur or spoke and hub. It is suggested that hub rail and spoke road would be a more effective and efficient solution for intermodal freight facilities and networks.
- 6.2. Large freight loads are currently transported through the CBD and cause disruption to the flow of traffic. If heavy-duty bypass roads are provided as proposed the incentive to use road transport for heavy freight to bypass cities will be increased. In addition, the road is unlikely to be effectively reserved for heavily loaded vehicles whereas rail is the only mode that can achieve this. In addition, it is suggested that an increase in transport by car will be incentivised as there will be new and greater road transport capacity offering ease of road use, which will detract from public transport use such as Gautrain.
- 6.3. We would suggest that the solution lies in measured use of strategically located rail to road intermodal solutions that are balance by market demand. We would also suggest that the market is best positioned to determine improved efficiency and effectiveness of operational and logistical requirements particularly as it is now informed of the existing and planned rail infrastructure.
- 6.4. By way of example, we understand and support the general urban development principles of densification and concentration particularly focusing on TOD nodes and linking corridors within the Urban Development Boundary to improve urban efficiencies and particularly to optimise public transportation. However, placing the intermodal freight terminals on the periphery is likely to result in greater road freight movement between the peripheral freight facility and the concentration of the market. It is suggested that rail movement into the central areas such as City Deep and distribution from a centrally located freight facility would be more efficient.
- 6.5. It will be important to establish the parameters used to define what is meant as the "CBD" and how this will be delimited on the ground and the monitoring and enforcement thereof undertaken.
- 6.6. Furthermore, a likely market reaction to the control of freight vehicles through limitations such as a 5 and more axle user pay system, would be to use a larger number of vehicles with fewer axles particularly if the payment justifies the change of vehicle type thus resulting in further added congestion on the roads. No legislation such as this which dictates to the market has been successfully enforced as the market will always adjust to the rules to effectively ensure its sustainability.



- 6.7. To improve efficient road linkages for freight movement the N17 must be considered as it would offer a bypass and city distributor and collector function. A short stretch of the N17 route should be secured and established as soon as possible between Wemmer Pan and Nasrec Road.
- 6.8. It is recognised that new freight hubs are to be established during the period of the Plan. However, as this will take some time we would suggest that this long-term strategy gives greater recognition to the future use of the existing City Deep facilities. In this regard, recognising the intentions of the GTIP5 initiatives, improved accessibility through investment in essential infrastructure including access and improved linkages to the N3, Rand Airport and bridging of Cleveland Road at Main Reef Road is imperative.
- 6.9. The road linkage through to Rand Airport from City Deep has been the subject of discussion over many years with the Johannesburg and Ekurhuleni officials to provide limited air freight transport opportunities from the City Deep area where fresh produce is a major commodity. This initiative should also be seen as an opportunity to add to the reduction of road freight vehicles moving fresh produce through the region.
- 6.10. The integration of this intervention into the National Strategic Infrastructure Project #2 (SIP2) should also feature more prominently in the Plan.
- 6.11. It is strongly suggested that with this strategic framework for future freight movement and management being identified, a suitable freight forum be established including private sector key role-players such as representatives of transportation and logistics companies, business and industrial chambers, developers and property companies as well as civil society organisations. This forum will be of vital importance to determine the optimal requirements for efficient freight movement and ensure appropriate infrastructural design and development is realised through meaningful participation, engagement and partnerships.
- 6.12. We wish to record our strongest objection to the proposed use of the PWV 16 as a key component of the freight ring concept. The alignment of this future road through the highly sensitive and irreplaceable environmental areas (as defined by Gauteng Department of Agricultural and Rural Development Conservation Plan) and undulating topography of the proclaimed Klipriviersberg Nature Reserve and associated ridges must be reviewed, particularly if it is planned for heavy freight vehicles. It is suggested that an alignment alongside the existing Swartkoppies Road (R554) between the R59 and R82 or possibly as far as N1 may be an alternative that should be considered.
- 6.13. We would welcome the opportunity to engage with the professional team to review the alignment of the PWV 16.

## **7. Intervention 6: Provincial Travel Demand Management (TMD) plan**

- 7.1. In view of the proposed Klipriviersberg Agritropolis we would request an opportunity for a review of the travel demand scenarios for the southern areas of Johannesburg and Ekurhuleni and Northern areas of Midvaal.
- 7.2. Associated with this review should be a reconsideration of a number of route alignments, including the K-routes 47, 77, 87, 122, 130, and 144, which impact directly on identified areas of environmental and biodiversity sensitivity including major ridges and wetland areas.
- 7.3. We notice that reference is made in Annexure J to the “City of Johannesburg, 2003, City of Johannesburg Integrated Transport Plan, 2003/2008”. We would suggest that the latest



update recently undertaken by Joburg known as the “Strategic Integrated Transport Plan Framework for the City of Johannesburg” also be considered and referenced.

## **8. Intervention 7: Mainstreaming Non-Motorised Transport (NMT)**

- 8.1. We welcome the mainstreaming of NMT and the recognition of the importance of these modes of transport. While the focus is on commuter transportation we would ask for a similar focus on the use of NMT for recreational purposes.
- 8.2. The southern areas are recognised as an important area for recreational cycling both on and off-road. The area is used for many local, provincial and international events and extensively for training activities by a wide range of local and regional communities as well as provincial and international teams. As a result, this is stimulating investment and growth in the provision of associated economic and social goods and services.
- 8.3. We therefore request that NMT for commuter and recreational networks be prioritised and supported in the preparation of network plans for implementation by local authorities and agencies.
- 8.4. Key stakeholders representing recreational cycling in Gauteng should be involved in the development and preparation of network plans for NMT facilities.

## **9. Intervention 8: Continued, sustainable province-wide road network mobility**

- 9.1. While the objectives include the promotion of environmental sustainability we would recommend that an objective is included whereby environmental sensitivity and recognition of biodiversity value, mitigating measures and opportunities for biodiversity offsets also be included.
- 9.2. In relation to improving the mobility, particularly in the central areas of Johannesburg, we would strongly recommend that the Department secures the alignment for the N17 between Wemmer Pan and Nasrec Road and initiate the construction of this section of the network, if it has not already been considered and incorporated.
- 9.3. iProp has also taken the initiative regarding proposals and suggestions for connections between the M2 motorway, Main Reef Road and the Golden Highway (P73-1/K45) which we request an opportunity to discuss with the professional team.

We trust that the above contribution will be of value to the Gauteng Roads and Transport Department and the preparation of the 25-Year Integrated Transport Master Plan.

We request the opportunity to meet with the professional team to provide additional information and clarification regarding this submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andrew Barker', with a large, stylized flourish at the end.

**ANDREW CW BARKER**