

The Project Manager  
SANRAL  
By e-mail: [AdamsD@nra.co.za](mailto:AdamsD@nra.co.za)

George Poole  
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18 February 2020

**And to:**

The Route Manager R72  
SANRAL  
By e-mail: [ian@msba.co.za](mailto:ian@msba.co.za)

**Your reference: S11/2/3-R72/2-1**

**Re: National Route R72 Section 2: Service Station on Erf 3139 (Portion of Erf 3134),  
Kenton on Sea**

Dear Sirs,

I am writing to you in connection with this matter, as I have seen that a Letter of Approval relating to the matter, issued by SANRAL, has been copied to you. Mr Adams, you will recall that, independently of this matter, and before I became aware of it, I had requested you to address the highly dangerous – and often fatal – situation on the R72 in the Kenton area.

I was therefore dismayed – to say the least – to read the contents of SANRAL's letter dated 29 January 2019 granting permission for a service station to be established on the R72 at the intersection of the R343, which is the only entrance to Kenton-on-Sea. What made it worse was that your approval was based on an amended Traffic Impact Assessment ("TIA") submitted on 5 December 2016, but which, on closer examination comprised traffic counts done in December 2004 and May 2015. As I am sure that you are well aware, the volumes of traffic since December 2004 to December 2019, on the one hand, and since May 2015 to February 2020, on the other hand, have increased vastly.

The TIA on which SANRAL's approval is based also contains numerous inaccuracies (to put it politely). These are:

1. It states that the count in 2004 of 620 vehicles in an hour reduced to 574 vehicles in a corresponding hour in 2015, and that this reflected a negative traffic growth rate. From an alleged traffic expert, this conclusion is not only startling, but grossly misleading and raises questions, at the very least, as to the professional competence of the traffic expert. Anyone familiar with this area, and indeed with the whole of the South African Coast, is fully aware that the traffic on the coast during the December holiday period is vastly higher than during May. It should be noted that Royal HaskonigDHV (PTY) Ltd (the traffic expert) is based in Port Elizabeth, and therefore should know better.

Contrary to the fallacious and seriously misleading conclusion proposed by the traffic expert, what is clear from the report is that the traffic in the Kenton area has increased so much in the 11 years from 2004 to 2015 that the normal traffic in May 2015 is nearly equal to the unusually high traffic in December 2004.

Another factor is that the vast increase in traffic at the intersection during the holiday periods – especially the December/January one - must also be taken into consideration in considering the safety aspect at the intersection of the R72 and the R343.

Indeed, the traffic in the Kenton area has continued to increase exponentially since May 2015 and any assessment of traffic volumes in relation to a proposed

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development would be nugatory unless it is absolutely current. This application cannot reasonably be considered by SANRAL without two new and current TIAs – one during a normal month and another during the holiday period in December. Thus, a valid assessment of high season traffic can only be obtained in December 2020. This application therefore cannot properly and responsibly be considered by SANRAL until after that date.

2. It is estimated that the population of the area increases from about 23 000 during the rest of the year to about 52 000 in the holiday period. The traffic at the intersection increases accordingly. The congestion on the R343 at the intersection with the R72 during this period is already untenable, with cars often backed up for up to 500 metres. With the added traffic to the fuel station and shops, and the congestion at the entrance/exit at Oettle Street, it will become impossible.  
On the other hand, if one blindly accepts the conclusion drawn by the traffic expert that the traffic in this area has declined – and no doubt will continue to decline - then the proposed development is destined to become a white elephant, and should, for this reason alone, not be allowed.
3. The minor cosmetic measures recommended in the report for pedestrians in an area already fraught with fatal and serious accidents are derisory.
4. The traffic expert recommends the installation of a left turn deceleration lane on the eastern side of the R343 approaching Oettle Street. It should be noted that the pavement along the eastern side of the R343 carries heavy pedestrian traffic in the mornings and afternoons, being people walking to and from work in Kenton from Ekuphumleni. Having to negotiate this lane and the resulting traffic would constitute an added danger to their already hazardous trip from and to work.
5. The traffic expert states in Paragraph 5 on page 9 of its report that “it should be noted that the proposed Service Station is not designed or intended for the refuelling of heavy vehicles.” No indication is provided as to how access for heavy vehicles will be prevented. If it is proposed to install booms and tight turns to prevent access to heavy vehicles (which is nowhere even mentioned), this could not possibly be true, as it would also prevent access by the very tankers who need to deliver fuel to the Service Station. One can only conclude therefore, that this is merely a vague glib statement, intended to allay concerns about traffic and congestion.  
The true position is that it will be impossible to prevent heavy vehicles from entering the Service Station. The prospect of heavy vehicles approaching from the west, turning across the traffic on the R72 and then negotiating the acute corner at the Oettle intersection is dismaying. This is exacerbated by the prospect of those same vehicles negotiating the same acute corner to re-enter the R343 and then turning right onto the R72 to continue their journey. When the traffic is already backed up past the Oettle intersection in holiday times, the result will be utter chaos.
6. In Paragraph 3.3 on Page 5 of the traffic expert’s report, it alleges that the 500m radius building restriction area imposed in the National Roads Act does not apply, as “the area of Kenton on Sea through which the R72 passes is thus clearly an urban area to which the building restriction area does not apply”. This allegation appears to be contradicted by SANRAL itself. Otherwise, why is the speed limit imposed by SANRAL 80kmh, rather than the normal limit of 60kmh applicable in urban areas? The 2 circumstances are mutually exclusive. Either SANRAL must accept that this part of the R72 is in an urban area, and must impose the generally mandatory safety

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measures on busy thoroughfares and intersections, including 60kmh speed limits, speed cameras and traffic lights at busy intersections. Otherwise, if this is not an urban area, then the 500m radius building restriction area applies, and the development cannot proceed.

7. No consideration at all has been given to the increase of right-turning traffic on the R72 coming from the West, or to the increase of traffic emanating from the filling station into Oettle Street and then entering the intersection of the R72 and the R343. As indicated in my recent e-mails to Mr Adams even before I became aware of the approval of the Service Station, this intersection is already a death trap, with 2 fatal accidents occurring in the last 3 months. There have also been fatalities of pedestrians crossing the R72 and of cars and trucks colliding on and plunging off the bridges over the Kariega and Boesmans Rivers.

A reduction of the speed limit to 60 kmh, speed cameras, traffic lights at the intersection of the R343 and the entrances to Boesmans River Mouth and Marselle – or, at very least, traffic circles at these 3 intersections – are desperately needed to avoid further loss of life in the area. To allow a new filling station to be erected at this already dangerous intersection without any consideration of these measures can only be described as grossly irresponsible on the part of SANRAL – or is loss of life of no interest to SANRAL?

KOSRA, on behalf of the ratepayers of Kenton – and on behalf of all residents of the wider area – therefore requests 3 urgent actions by SANRAL:

1. Reverse any approval which may already have been granted by your letter dated 29 January 2019.
2. Refuse approval for a filling station at the intersection of the R72 and the R343. Surely a safer position can be found, if, indeed there is any need or justification for another filling station in this area;
3. Reduce the speed limit to 60 kmh and install speed cameras. They are highly effective at both Colchester and Plettenberg Bay. Install traffic lights at the 3 dangerous intersections at the R343, the entrance to Boesmans and the entrance to Marselle.

Yours sincerely,  
George Poole  
For KOSRA.

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