Revision of the 2002 Environmental Management Programme (EMP) for Road Cycling and Mountain Biking: Table Mountain National Park (TMNP)

compiled by

SANParks

and

Table Mountain Mountain Bike Forum (TMMTB Forum)

Draft for Public Comment

MARCH 2016
Document for Public Comment

This document is the draft of the Revision of the 2002 Environmental Management Programme (EMP) for Road Cycling and Mountain Biking in the Table Mountain National Park.

This document is an opportunity for interested parties, stakeholders and authorities to provide information and comment on this first draft which sets out how cycling will be managed in the Park.

Where to find the EMP:
Electronic copies, along with high resolution maps are available from the following websites:

Hard copies of the draft EMP have been placed at the following public libraries:

<table>
<thead>
<tr>
<th>Athlone Public Library</th>
<th>Bellville Public Library</th>
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<tbody>
<tr>
<td>Cape Town: Central Library</td>
<td>Claremont Public Library</td>
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<tr>
<td>Fish Hoek Public Library</td>
<td>Grass Park Public Library</td>
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<td>Gugulethu Public Library</td>
<td>Hout Bay Public Library</td>
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<td>Khayelitsha Public Library</td>
<td>Langa Public Library</td>
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<tr>
<td>Mitchell's Plain Town Centre Library</td>
<td>Mowbray Public Library</td>
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<tr>
<td>Simon's Town Public Library</td>
<td>Tokai Public Library</td>
</tr>
</tbody>
</table>

and the following Park offices:

| Boulders – Simons Town | Tokai Manor House – Tokai | Kloofnek Office – Cape Town | Silvermine Office - Silvermine |

To ensure your submission is as effective as possible, please provide the following:
- include name, organisation and contact details;
- comment to be clear and concise;
- list points according to the subject or sections along with document page numbers;
- describe briefly each subject or issue you wish to raise;

Comment period
The document is open for comment from 04 April 2016 to 04 May 2016

Where to submit your comments
Planning@cndv.co.za
For attention: Simon Nicks

Or, delivered to TMNP Tokai Manor Park office by 04th May 2016.

March 2016
CONTENTS

GLOSSARY & ACRONYMS

1. INTRODUCTION
1.1. Purpose and scope of the document
1.2. Context for recreational EMP’s
1.3. Recreational EMP’s
1.4. The cycling user group
1.5. Format of this EMP
1.6. Approach to preparing the document
1.7. TMNP user groups’ comments on MTB

2. ENVIRONMENTAL IMPACTS AND ISSUES

3. VISION, PRINCIPLES AND OBJECTIVES OF THE EMP
3.1. Vision
3.2. Principles
3.3. Objectives

4. MANAGEMENT FRAMEWORK
4.1. Designated existing routes
4.2. Proposed additional routes
4.3. Possible future MTB routes to be investigated
4.4. Procedure to open new MTB routes
4.5. Code of Conduct

5. INSTITUTIONAL FRAMEWORK

6. SCHEDULING OF IMPLEMENTATION: ACTIVITY MANAGEMENT

REFERENCES

ANNEXURES
A: Activity suitability per Conservation Development Framework Zonation
B: Current and proposed cycle routes
   Route Map 1: Western Seaboard
   Route Map 2: Table Mountain Trails
   Route Map 3: Newlands to Constantia Nek
   Route Map 4: Tokai
   Route Map 5: Silvermine
   Route Map 6: Jonkersdam to Red Hill
   Route Map 7: Cape of Good Hope
C: TMNP Cycling EMP review – stakeholder user groups
GLOSSARY

Code of Conduct: Accepted rules and guidelines for cycling in the Park
Cyclo-cross The activity of riding modified road bicycles on non-technical cross
   country courses and routes.
Cyclist Generic term used in this EMP for all those riding cycles including cyclo-
   cross cycles, road cycles, mountain bikes and other non-conventional
cycles as different to horse riders or motor cyclists (bikers).
Hand cycle Specially designed bicycle or tricycle which a paraplegic cyclist pedals
   using hands.
Mono-cycle Pedal cycle with only one wheel.
Mountain biking The activity of riding specially designed bicycles off-road, often over
   rough terrain, including management tracks and single tracks which can
   be technical in nature requiring a high level of skill to traverse. There are
   several types of mountain biking including recreational, cross-
country/enduro and downhill.
MTB Working Group SANParks and TMMTB Forum joint management
group.
Non-conventional cycling: The activity of riding electric cycles, mono-cycles, supine recumbents,
tandems and other forms of single, two or more wheeled cycles as may
be conceived of in the future.
Road Cycling The activity of riding bicycles designed for travelling on paved roads.
Routes Roads, trails, management tracks or single tracks within TMNP approved
   for use by cyclists as designated SANParks through this EMP.
Supine recumbent: Specially designed road cycle which cyclist pedals from a supine position.
Tandem Two wheeled road cycle or mountain bike accommodating two cyclists.

ACRONYMS

CFRPAWHS Cape Floral Region Protected Areas World Heritage Site
CBD Central Business District
EA Environmental Assessment
EMP Environmental Management Programme
MTB Mountain Bike
PAA National Environmental Management: Protected Areas Act (PAA) No 57 of 2003 (as
   amended)
PMC Peninsula Mountain Chain including valleys and lowlands under SANParks’
   management and private owners, including SANBI (Kirstenbosch)
SANBI South African National Biodiversity Institute
SANParks South African National Parks
TMMTB Forum Table Mountain Mountain Bike Forum
TMNP Table Mountain National Park
1. INTRODUCTION

1.1. PURPOSE AND SCOPE OF THE DOCUMENT

This Environmental Management Programme (EMP) provides an overarching framework for the management and regulation of all cycling (road and mountain biking) in the Table Mountain National Park (TMNP). The EMP also covers all alternative and non-conventional cycling cyclo-cross, tandems, mono-cycles, supine recumbents, hand cycles, BMX, electric bicycles and other forms of cycling that may arise from time to time in the Park in the future.

The primary aim of this EMP is the sustainable utilisation of a natural asset with an emphasis on biodiversity management and diverse recreational opportunities in the TMNP.

The EMP specifically aims to:

- review the approved MTB EMP of 2002, taking into account the draft EMP review of 2008;
- sustain and strengthen a constructive partnership between cyclists in the Park and Park management;
- identify and mitigate the impacts of cyclists on biodiversity and heritage resources within the Park;
- identify and mitigate the impacts of cyclists with other recreational users and park visitors;
- describe procedures for designating appropriate routes within the TMNP which can be used for recreational cycling and mountain biking;
- develop guidelines and an associated code of conduct for cyclists / cycling in the Park;
- develop a coordinated uniform approach to, and activities required for, the implementation, monitoring and enforcement of this EMP;
- identify the roles and responsibilities of SANParks and other stakeholders in the implementation and enforcement of the EMP; and,
- manage future growth and diversity in road cycling and mountain biking in the Park.

The EMP covers non-event cycling activities in the Park. Organised Sporting Events and Film Permits for non-profit or personal gain fall outside the ambit of this document. A Permit is required for activities such as filming, conducting of tours, competition, fund raising, personal gain or making a profit, sporting events, research, sales, provision of services, etc. Please see SANParks website: Table Mountain National Park, for application details.

This EMP is intended to be used by cyclists, SANParks management, TMMTB Forum, other cycling and mountain bike organisations. It is also intended for reference by Park users.
including hikers, walkers accompanied by dogs, horse riders, trail runners and the general public.

SANParks is the management authority within the TMNP for the implementation of this EMP. However, there is other land on the Peninsula Mountain Chain (PMC), outside of the TMNP, that forms part of a wider current or potential future cycle network across the PMC.

1.2. CONTEXT FOR RECREATIONAL EMPs

TMNP is one of South Africa’s 23 national parks and is managed by SANParks which is a Schedule 3(a) ‘public entity’ in terms of the Public Finance Management (Act, 1 of 1999). The core mandate of SANParks is the conservation and management of biodiversity through a system of National Parks and in accordance with the National Environmental Management: Protected Areas Act (PAA), 57 of 2003 and accompanying regulations.

The Park also forms part of the Cape Floral Region Protected Areas World Heritage Site (CFRPAWHS) which was inscribed as a serial World Heritage Site by UNESCO in 2004. The World Heritage Site initially encompassed eight protected areas covering 553,000 hectares within the Fynbos biome and represents outstanding universal value for the on-going ecological and biological processes associated with the evolution of the unique Fynbos biome.

The Regulations for the proper administration of Special Nature Reserves, National Parks and World Heritage Sites (GN R.1061, 28 October 2005) issued in terms of section 86 (1) of the PAA governs all visitors and users of the Park. These regulations cover various management aspects including, admission, entry points, overnighting, pets, permitting activities, etc. within the Park and World Heritage Sites.

The Park is not a continuous land unit but is fragmented by urban development and privately owned land. It is divided into three management areas (Figure 1):

- Area North: extends from Signal Hill to Constantia Nek;
- Area South: the Central and Southern section’s extending from Constantia Nek to the Cape of Good Hope; and
- Area Marine: includes the Marine Protected Areas.

The Park is a popular destination for a wide variety of outdoor recreational activities with approximately 25 recreational activities occurring. These include mountain biking, hiking, horse riding, sport climbing, rock climbing, trail running, hang and para gliding, picnicking, walking accompanied by dogs etc. In addition, due to its proximity to the City of Cape Town and with world renowned tourism destinations such as Cape Point, and the Table Mountain Cableway, it is a popular tourist destination with approximately 4 million visits to the Park per annum.
Figure 1: Table Mountain National Park
A significant challenge faced by TMNP management is to provide for and administer these diverse recreational activities without compromising the experience of other visitors and users and to conserve the integrity of the unique biodiversity and heritage resources of the Park. To this end, SANParks prepared in 2000 and revised in 2007 and 2015, a Park Management Plan (PMP) which is prepared and approved in terms of the PAA.

Part of the PMP is a spatial framework, the Conservation Development Framework (CDF) that identifies visitor use zones and visitor sites:

- **Use Zones:** These zones define aspects such as the experiential qualities, type of activities, degree of interaction with other users, type and size of facilities, the sophistication of facilities, the type of access and the standards of roads within each zone. Annexure A outlines the activity suitability as per the Parks’ zoning in terms of the CDF and Park Management Plan.

- **Visitor facilities and activities:** Tourism and visitor service infrastructure is usually located at designated Visitor Sites which are designed to fulfil a defined role. The Park provides a wide range of facilities for visitors and recreational users. These range from accommodation, food and beverages, restaurants, cable ways and event / function locations.

### 1.3. RECREATIONAL EMPs

With the establishment of the Park in 1998, it was agreed between the Park stakeholders and Park Management to formally recognize appropriate recreational activities that should occur within the TMNP. It was seen that a number recreational activities have the potential to impact on both the environment and other recreational users if not managed appropriately.

Currently the Park receives approximately 4 million tourist and recreational visits per year and the recreational EMPs seek to provide a structured and consistent approach to address a range of environmental issues relating to recreational activities in the Park. As such, a set of regulations, permits and Environmental Management Programmes apply to a number of activities in order to minimize the impacts on the environment and other users of the Park. Through public processes, EMP’s have been developed and implemented for walking with dogs, hang and paragliding; sport/rock climbing; horse riding; and mountain biking.
1.4. THE CYCLING USER GROUP

The currently approved MTB EMP was compiled in 2002. Since then, MTB usage has grown significantly as well as the use of the Park by other recreational users. The growth in cycling and mountain biking in the Park has led to the development of various organisations to assist with its management. The Table Mountain MTB Forum is a constituted body comprising representatives from Pedal Power Association, Amarider and TokaiMTB. Table Mountain Bikers, are a voluntary association active in the Table Mountain area of the northern area of the Park. The TMMTB forum also provides a platform for cycling groups or individual mountain bikers who may not be affiliated to one of the above organisations to have a say in mountain biking in the PMC.

The two types of cycling that are the primary focus of the EMP, (see glossary) are:

- Road cycling – cycling on paved roads within the Park;
- Mountain biking, which includes:
  - leisure (“soft”) – compatible with other users
  - cross-country/enduro - undertaken by more serious and skilled cyclists, generally compatible with other users except when descending on shared routes; and,
  - downhill – high speed descents not compatible with other users including other forms of mountain biking.

1.5 FORMAT OF THIS EMP

The EMP is structured as follows:

- Section 1 introduces the EMP, including:
  - its purpose,
  - background and overview of the current status of an activity.

- Section 2 profiles the potential environmental impacts on the natural and heritage recourses of the Park, other recreational users and visitors.

- Section 3 frames the overall vision and objectives for the EMP.

- Section 4 describes the implementation of the EMP, including:
  - identification of approved routes,
  - the Code of Conduct (compliance and etiquette),
  - identification of management and enforcement activities.

- Section 5 describes the institutional roles and responsibilities for the EMP.

- Section 6 identifies the broad scheduling for the implementation of the EMP.
1.6. APPROACH TO PREPARING THE DOCUMENT
The approved 2002 MTB EMP, a document with which all stakeholders are familiar, and the draft 2008 review of the EMP, form the basis for this revision. This document was produced as follows:

- A series of meetings and interviews were held with other user groups in TMNP including horse riders, trail runners, hikers, walkers Friends groups and environmental organisations (Annexure C). The key responses from these engagements are described in section 1.7 below;
- These inputs were then discussed with TMMTB Forum members and additional comments considered;
- SANParks internally workshopped all comments and meetings were held with TMMTB Forum for agreement on the draft of the revised EMP to be circulated for public comment;
- This draft revised EMP is advertised for public comment using the various TMNP, MTB platforms, the media and press; and,
- Final EMP will be prepared, taking into account all comments received, for approval by SANParks.

1.7. TMNP USER GROUPS’ COMMENTS ON MTBs IN TMNP
The key responses from meetings and interviews with representatives of horse riders, trail runners, walkers and hikers, biodiversity conservationists and mountain bikers, included the following:

- mountain bikers were generally welcomed on the mountain trails as they provided a greater level of surveillance;
- the main concern with trail sharing with mountain bikers related to high-speed descending when MTBs could startle horses; and especially, aged hikers and walkers. This could be addressed by separate descending single tracks, the use of bells, slowing down and a courteous exchange of greetings;
- horse riders were considered to be sensitive users to trail sharing along with aged hikers, walkers with dogs, mountain bikers, and trail runners in that order. Trail runners and younger hikers were perceived to be less sensitive as they could move out of the way most easily;
- there was general support for the My Activity Permit or other ‘user pays’ system providing these funds are used to mitigate the impacts of that particular user group. A widespread need for transparency as to the allocation of these funds was expressed;
- the lack of security in TMNP and the need for an effective emergency response system was widely raised as a major concern;
• all users believed that keeping dogs under control while in the Park should require they always be on a leash and measures should be taken to ensure that dog faeces are always removed;
• mountain biking was considered compatible with biodiversity conservation if a wide range of mitigation measures was implemented including:
  - biodiversity baseline surveys to ensure that trails did not pass through sensitive vegetation;
  - proper vertical and horizontal trail alignment and design that protects watercourses, avoids sensitive vegetation and critical biodiversity areas and minimises erosion and compaction;
  - prevention of uncontrolled importation of alien vegetation and construction material for maintenance purposes; and,
  - regular and effective trail maintenance to prevent shortcuts, washouts, gullies, and braiding and other forms of erosion.
2. ENVIRONMENTAL IMPACTS AND ISSUES

This section provides a brief assessment of the potential environmental impacts of cycling in the Park, and the status of those impacts.

The identification of these key environmental impacts provides the framework for:

(i) the development of the environmental vision and objectives for the EMP (Section 3);
(ii) the identification of the routes available for cycling (Section 4); and
(iii) a code of conduct, comprising etiquette and rules and any other management activities that may be required to mitigate these impacts (Section 4).

The potential impacts that are identified in relation to cycling are presented in Table 1. The status of these potential impacts, with and without management, is reflected in Table 1 as follows: if they are positive (+ve); if they are slight/neutral (0); or if they are negative (-ve).

Table 1: The potential environmental impacts of road and mountain biking in the Park

<table>
<thead>
<tr>
<th>Activity</th>
<th>Potential Impact</th>
<th>Status Without management</th>
<th>Status With management</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Arrival / departing at</td>
<td>Parking requirement</td>
<td>-ve</td>
<td>-ve</td>
</tr>
<tr>
<td>parking areas</td>
<td>Trampling of, and damage to, indigenous vegetation</td>
<td>-ve</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Increased noise</td>
<td>-ve</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Experience with other visitors or recreational users</td>
<td>-ve</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Increased litter</td>
<td>-ve</td>
<td>+ve</td>
</tr>
<tr>
<td>2. Trail Riding</td>
<td>Erosion of tracks and adjacent areas</td>
<td>-ve</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Trampling and compaction of natural vegetation, notably young sapling plants</td>
<td>-ve</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Watercourses altered and seed banks destroyed</td>
<td>-ve</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Shortcuts and illegal routes</td>
<td>-ve</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Conflict with cyclists</td>
<td>-ve</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Increased noise</td>
<td>-ve</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Disturbance of animals</td>
<td>-ve</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Disturbance of nesting or ground birds</td>
<td>-ve</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Disturbance of heritage sites</td>
<td>-ve</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Increased sense of security of rider</td>
<td>-ve</td>
<td>+ve</td>
</tr>
<tr>
<td></td>
<td>Increased litter</td>
<td>-ve</td>
<td>+ve</td>
</tr>
<tr>
<td></td>
<td>Physical exercise</td>
<td>+ve</td>
<td>+ve</td>
</tr>
<tr>
<td></td>
<td>Experience of other recreational users and visitors</td>
<td>-ve</td>
<td>0</td>
</tr>
<tr>
<td>3. Trail Maintenance</td>
<td>Introduction of alien vegetation and construction material</td>
<td>-ve</td>
<td>+ve</td>
</tr>
<tr>
<td></td>
<td>Disturbance of in situ soil and substrates</td>
<td>-ve</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Increased litter</td>
<td>-ve</td>
<td>+ve</td>
</tr>
<tr>
<td>4. Civil Organisations</td>
<td>Funding for conservation and management</td>
<td>0</td>
<td>+ve</td>
</tr>
<tr>
<td></td>
<td>Economic growth and employment creation</td>
<td>0</td>
<td>+ve</td>
</tr>
</tbody>
</table>
3. **VISION, PRINCIPLES AND OBJECTIVES OF THE EMP**

3.1. **EMP VISION**

In line with the overall vision of the Park, “A Park for All, Forever”, Park management strives to balance the core business mandates (biodiversity, heritage and tourism management) required by SANParks with the need for management excellence within an urban environment.

The following vision will guide the implementation of this EMP:

*To ensure responsible access to, and use of designated routes within Table Mountain National Park, without compromising the natural environment, for the benefit and use of current and future generations of road cyclists and mountain bikers.*

3.2. **PRINCIPLES**

The environmental principles provide a framework for setting of objectives and actions. MTB representative groups, road cyclists and mountain bikers using the cycling network in the TMNP must be aware and committed to the following principles:

- Minimise the impact of cycling activities on the environmental integrity of the Park;
- Avoid impacts on the cultural and heritage environment of the Park;
- Identify, assess and mitigate the environmental impacts of current and potential routes on the trail network;
- Adhere to environmental conditions for opening new routes or rerouting/closing existing ones in the Park;
- Cooperate with, recognising and responding to managing authorities concerns;
- Open new trails and maintain existing must comply with National Environmental Management Act (NEMA) regulations;
- Where possible, trails within TMNP should link with trail and road networks outside of the Park; and,
- Monitor cycling activities to ensure compliance with the principles described above;

3.3. **OBJECTIVES**

The objectives to achieve the vision and principles of the EMP.

**Objective one:** to identify cycling routes in the Park;

**Objective two:** to ensure adherence to the code of conduct that governs behaviour of mountain bikers and road cyclists between themselves and other Park users;

**Objective three:** to implement an effective monitoring and maintenance programme of the MTB route network including gravel roads, trails, management tracks and single tracks;

**Objective four:** to ensure effective and ongoing communication and provision of relevant and useful information between Park management and user groups;

**Objective five:** strive for the sustainable and equitable provision of resources to mitigate the impacts of cycling activities while supporting wider biodiversity conservation initiatives programmes to ensure the integrity of the Park
4. MANAGEMENT FRAMEWORK

This section seeks to operationalise the vision and objectives described in Section 3. It explicitly identifies the designated routes in the Park for cycling, the code of conduct (etiquette and compliance) and the means for communication and informing the users of the Park.

All road cyclist and mountain bikers require a permit, issued in terms of the Protected Areas Act, before commencing the activity within the Park. The current form of the permit is the ‘My Activity Permit’ which is available from the Tokai Park office as well as several Cape Town Tourism offices.

Section 4.1 to 4.3 outlines the current designated existing routes, proposed additional routes that are being considered for inclusion into the route network as part of this revised EMP and possible future routes to be investigated further as they currently not possible.

4.1. DESIGNATED EXISTING ROUTES

These comprise paved roads, management tracks and single tracks listed below. If temporary or permanent closure of designated tracks should be undertaken between SANParks and TMMTB Forum, trail closures will be advertised on site and in the relevant media. Closure of routes under emergency conditions (e.g. fire, flood, crime etc.) is at the discretion of SANParks.

Western Seaboard (Route Map 1)

This route facilitates access to and from the City Bowl and will initiate the start of a continuous trail along the length of the Peninsula. Access to Signal Hill tar road occurs along a gravel service road from Schotschekloof to the spine track leading along Signal Hill / Lion’s Head. Due to potential user conflicts, this gravel service track is designated a one-way route only, starting at Schotschekloof and travelling in the direction of Signal Hill road (Route Map 1).

Table Mountain Trails (Route Map 2)

Deer Park consists of a limited network of management tracks extending from Kloof Nek to Mowbray Ridge. The area is north-facing has no shade, making it very hot in summer. Most of the cycling is on very rocky and steep management tracks. Despite these shortcomings, Deer Park is very popular due to the convenience for cyclists living in the City Bowl. It will also be an important component of a continuous route that is proposed in this EMP (Route Map 2).

The Deer Park management tracks are connected to the gravel management track loop on Groote Schuur Estate. The circular loop on the Estate starts from the tar road leading to Rhodes...
Memorial and traverses Plum Pudding Hill taking the cyclist back to the tar road. This route is primarily provided for family and recreational riders.

**Tokai (Route Map 4)**

The area was erroneously included in the EMP of 2002. At that stage Tokai was still managed by SAFCOL and SANParks was obliged to remove these areas from the EMP and notices were placed in the media alerting the public of this correction. SANParks took over the management of Tokai in 2005 and the pre-handover arrangements were carried over. Tokai routes were then included in the EMP.

Tokai is the best and most popular existing facility in the TMNP for the sport of mountain biking. It offers good elevation changes, an extensive network of management tracks and a well-developed network of single tracks.

Tokai tracks are connected to Silvermine mountain bike route (see Silvermine route description below) via the Level 5 management track. Tokai also provides access to the FM Mast located at the top of Constantiaberg. Access is via a steep tarred road, which gives the more enthusiastic and fit rider an opportunity to gain significant altitude while experiencing the beauty of the higher fynbos vegetation. In addition, this road provides unequalled panoramic views over the Southern Peninsula and Hout Bay.

As a result of the March 2015 fires and intensive post-fire plantation harvesting, the Upper and Middle Tokai routes are being reviewed and rationalised and once finalised will be adopted as part of the EMP.

Lower Tokai comprises a circular family orientated ‘soft’ cycling route that links into the wider Constantia Green Belt network.

**Silvermine (Route Map 5)**

The Silvermine main circuit route starts in the mountain biking parking area located off the main tar road in Silvermine, approximately 600m before the dam. The route heads up the gravel road towards Constantiaberg, and then turns off up Noordhoek Peak. Cyclists descending from Noordhoek Peak towards the dam can elect to either return to the parking lot via a management track running parallel to the main tar road or use the main road to the Ou Wa Pad, which ultimately connects with Ou Kaapse Weg near the Silvermine retirement village.

The route via Noordhoek Peak is designated as a one-way loop starting at the parking area and heading up towards Constantiaberg on the northern edge of the valley (i.e. anti-clock wise direction). It includes the option to visit a viewpoint overlooking Constantia towards Elephants.
Eye on the existing management track. This loop connects to Tokai Level 5 management track via a gate on the main tar road through Silvermine. The management track on the southern side of the Mountain Bike parking area has been designated as two-way access to allow for quick access to the route on the southern side of the Silvermine Dam.

Provision has been made for a connection between ou Kaapse Weg and the Clovelly Country Club (privately managed) in order to link to routes on False Bay coastline.

**Jonkersdam to Red Hill (Route Map 6)**
A circular route through the Jonkersdam area which connects the Glencairn expressway to the Red Hill road via Lewis Gay Dam and the Brooklands Water Treatment Plant. The soils in this part of the peninsula are very sandy, but the management tracks identified are accessible by MTB’s.

**Cape of Good Hope (Route Map 7)**
This scenic area of the Park is not ideal terrain for mountain biking and is more suited for traditional road cycling. The route consists of the tarred roads as well as one gravel track, and does not offer significant elevation and has no shade cover or wind protection. The Cape of Good Hope area also tends to be very windy, making for challenging cycling for most of the dryer summer months.

### 4.2 PROPOSED ADDITIONAL ROUTES
A number of links are proposed to be opened for cycling that focus on connecting currently designated routes, thus creating options for longer rides, or alleviating congestion on well used routes by allowing alternative entry/exit options (mainly in the City Bowl). These Proposed Additional Routes will only be available for cycling once the EMP has been finalised and the required signage and any required trail interventions have been implemented.

**Western Seaboard: (Route Map 1)**
**Lions Head Circular Route**: From Signal Hill Kramat (Sheikh Mohammed Hasen Gaibie Shah Al Qadri) to Fresnaye (Top Road) following the path above Clifton around to Kloof Road above Camps Bay Glen.

**Signal Hill Trail**: From Signal Hill Kramat (Sheikh Mohammed Hasen Gaibie Shah Al Qadri) along Pat’s Track to Glengariff Road.

**Quarry Hill Road to Schotsche Kloof**: Link from Quarry Hill Rd, along the firebreak path to Schotsche Kloof quarries. Optional entry or exit options on De Hoope Avenue, Poyser Road and Milner Road.
Kloof Nek to Camps Bay via the Glen: Link from Camps Bay Drive, linking through the Glen to Victoria Drive and Chilworth Road. This route is not intended as a downhill speed route and speed reducing measure will need to be put in place.

Camps Bay Track Network: Linking Kloof Nek to Camps Bay management tracks via the Pipe Track with optional exit or entry points via Theresa Avenue or Camps Bay Drive.

Table Mountain Trails (Route Map 2)
Kloof Nek Car Park Links: Single track to Glencoe Avenue and Molteno Road.

Deer Park links: Network of existing track and footpath as per Route Map 2.

Plum Pudding Hill: Plum Pudding link between the two management tracks.

Groote Schuur Estate link: From |alkunta pedestrian Bridge (Mostert's Mill) to Rhodes Memorial Parking.

Mount Pleasant by-pass: circumventing the SANParks Mount Pleasant office and link path to Rhodes Memorial road near the main entrance gate.

Newlands to Constantia Nek (Route Map 3)
Newlands by-pass: Along the constructed path alongside the M3 at the entrance of Groote Schuur Estate to the firebreak near Upper Cannon Street, then to the Kirstenbosch boundary at Lubbert's Gift.

Cecilia Car Park to Constantia Nek link: From Cecilia Car Park follow the single track adjacent to the cork oaks alongside Rhodes Avenue and then to the lower management track to the lower parking at Constantia Nek.

Silvermine (Route Map 5)
Tokai – Silvermine links: The old mule track will link the Silvermine Trials with the Tokai Trail Network without having to use the tar road to the Silvermine Dam.

Sunbird Centre Loop: A short circular loop linked to the education center on the old management track that heads towards the Clovelly Country Club.
4.3. POSSIBLE FUTURE MTB ROUTES TO BE INVESTIGATED

These are areas that have been identified for possible route designation for cycling in the future. The routes have not been mapped as they are only at a conceptual development level.

**Newlands Forest**

The network of walking trails is not open to cycling. Concern has been raised about opening up Newlands Forest to MTB because of its fragile ecosystem and vulnerability to pulverising and compaction particularly when it is wet. Historically, the possibility of an MTB trail following the existing tracks along its upper boundary have been investigated.

**Kirstenbosch Botanical Gardens**

This area is not part of TMNP but an MTB trail would facilitate a link between Cecilia and Newlands.

**Cecilia**

Network of management tracks accessible off Rhodes Drive. It is cut off from the Table Mountain network by Kirstenbosch Botanical Gardens and Newlands to the north and from the Tokai network to the south by private property around Constantia Nek.

**Table Mountain West**

A potential route from Constantia Nek through Hout Bay and past Llandudno to Cape Town CBD along the Twelve Apostles mountain chain.

**Tokai to Constantia Nek via Vlakkenberg**

To link Tokai to Constantia Nek via Vlakkenburg. Although there are established hiking trail routes in the area, these may not be suitable for mountain biking purposes and alternative routes may need to be found.

**Ou Wapad to Steenberg (ou Kaapse Weg bypass).**

Using the original wagon train from the bottom of ou Kaapse Weg, along the slopes of Steenberg Peak to the top of Steenberg Plateau.

4.4. PROCEDURE TO OPEN NEW MTB ROUTES

The following steps are necessary to open routes which may follow an existing management track or single track, or may be an entirely new alignment.

**Who may propose a new MTB route:**

Forum members or an individual cyclist can propose a new route to the TMMTB Forum.
Procedure for making a proposal:

New route proposals must be submitted in writing to the TMMTB Forum, accompanied by a plan of the proposed route alignment, funding, maintenance etc.

Process and criteria for considering a proposal:

The TMMTB Forum must map the proposed route, inspect and consider a variety of criteria and standards, such as: whether the proposed route is suited to cycling; potential for trail conflict with other users; erosion; avoidance of sensitive biodiversity habitats; maintenance and funding crime and safety; and any other considerations.

Possible need for baseline biodiversity and heritage studies:

Routes may not be approved if they disturb sensitive habits or rare indigenous plants or animal species or the integrity of a cultural heritage site. A biodiversity baseline study and possibly a heritage impact study may be required to assess this.

Rider safety:

Rider safety must also be taken into account in the design and alignment of the proposed trail.

Consideration by SANParks:

Once the proposal has the written support of the TMMTB Forum it must be forwarded to TMNP Cycling/MTB Working Group for SANParks assessment.

Assessment:

SANParks may support/amend/reject the proposed route.

Feedback from SANParks:

If supported, SANParks will inform the Working Group if there is a need to conduct an Environmental Assessment (EA) in terms of the NEMA regulations of the proposal, or proceed to public and stakeholder comment, if necessary.

Public and stakeholder comment:

The new route, will be advertised on the SANParks and TMMTB Forum websites for public comment.

Approval:

Based on comments received, SANParks may approve, with applicable conditions (construction, maintenance, management, signage etc.) or reject the proposal.

Route continuity:

As a general rule, continuity of routes that may involve different landowners or managers, e.g. a trail using City of Cape Town public open space connecting (links) to or from the TMNP, should be encouraged and be supported by all parties concerned where appropriate.
4.5. Code of Conduct

A key aspect of the EMP is an on-going communication with, and education of, cyclists riding in the Park. The principal message for this communication and education program is captured in a succinct code of conduct. All persons cycling in the Park are required to adhere to the code of conduct which comprises two sections: compliance and etiquette.

The objective of the code of conduct is to:

- Ensure compliance with Park rules, regulations and the EMP;
- inculcate courtesy and consideration towards other Park users and visitors;
- self-policing; and
- develop a respect for, and reduce the impacts on the globally and nationally unique natural and cultural resources of the Park.

The code of conduct will guide activities of cyclists in the TMNP as follows:

Compliance

- All cyclists must carry a valid permit to cycle in the TMNP in the form of a ‘My Activity Permit’ or approved permit, or a day permit.
- Cyclists must remain on approved, designated routes (see accompanying maps) at all times, except in the event of an emergency.
- Cycling on designated routes is subject to any special management conditions that may apply.
- Routes that have been temporarily or permanently closed must not be used.
- No widening of routes or taking shortcuts.
- Cyclists must not develop new routes.
- All Park regulations must be adhered to.
- All Park notices and Park signage and any instruction from a SANParks official must be complied with.
- Cyclists travelling downhill must yield to cyclists headed uphill, unless the trail is clearly signposted for one-way or downhill only traffic.
- Cyclists must not disturb animals.
- Cyclists must yield / give way to all vehicles.
- Cyclists must ride in single file on all tar roads.
- Cyclists need to use appropriate safety equipment as required by law e.g. wear helmets.

Etiquette

- Cyclists should yield / give way appropriately to other route users and give them appropriate warning by greeting / signal or using a bike bell.
- Use special care when passing horses or dogs.
- Cyclists should ensure that they have the relevant emergency telephone numbers on their mobile phones.
- Cyclists need to retain control of their cycles at all times.
- Cyclists should avoid unnecessary braking and skidding.
- Cyclists must try to anticipate other trail users especially when riding around corners.
- In general, cyclists should make each interaction a courteous one.
- Cyclists should strive to be self-sufficient, keeping their equipment in good repair and carrying the necessary tools and clothing for changes in the weather or other conditions.
- Cyclists should ride in single file when approaching or being approached by vehicles on management tracks.
- Cyclists should inform others of the proposed routes and timing for reference in the event of emergencies.

SANParks’ rangers are responsible for correction and enforcement for cyclists and other Park users. Enforcement options that may be used include:
- Issuing fines or arrest;
- Confiscating or revoking My Activity Permits or daily permits;
- Confiscating cycles; and,
- In appropriate cases, blacklisting cyclists from using TMNP cycle routes.
5. INSTITUTIONAL FRAMEWORK

ROLES AND RESPONSIBILITIES

SANParks
SANParks is the managing authority of the TMNP and as such is the ultimate decision making authority within the boundaries of the national park. SANParks is mandated with managing the environmental integrity of the TMNP and as such SANParks has legislative power/directive to establish rules regarding all activities within the TMNP. In terms of this EMP, SANParks is responsible for the following within TMNP:

- Monitor cycling activities.
- Approve signage.
- Maintain designated routes.
- Close illegal or non-approved routes.
- Meet with the TMMTB Forum to discuss this EMP.
- Enforcement of the PAA and EMP.
- Support the TMMTB Forum.
- Communicate with the Forum on any matters that may affect cycling in the TMNP.
- TMNP management should encourage cycling groups, individual cyclist or members of the public with cycling issues to engage with and through the TMMTB forum.

TMMTB Forum
The TMMTB Forum executive committee is responsible for:

- Liaise with SANParks on a regular basis on cycling management matters in TMNP.
- Act as cyclists’ first point of contact with SANParks.
- Assist with designated route maintenance in liaison with SANParks in TMNP.
- Assist with safety and reporting incidents to SANParks.
- Where possible assist SANParks with the monitoring of cycling activities.
- Inform and educate cyclists about the contents of this EMP which shall be posted on TMMTB, its affiliate organisations and SANParks’ websites.
- Liaise with SANParks in designing signage and routes within TMNP.
- Promote a common signage theme in the PMC both inside and out of the TMNP.
- Meet with SANParks to discuss implementation of this EMP and any required changes.
- Assist with revisions and updates of this EMP.

Individual cyclists
Individual cyclists should be encouraged to take up issues with the Forum before approaching SANParks.
6. SCHEDULING OF IMPLEMENTATION: ACTIVITY MANAGEMENT

This section describes the activities that are required to enable implementation of this EMP. Table 2 describes the key implementation activities identified in this EMP, the prioritisation of the activity, the responsibility for the activity and the anticipated scheduling.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Priority</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Adoption and initial communication of the EMP</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1. Adopt the final EMP</td>
<td>High</td>
<td>Park management</td>
</tr>
<tr>
<td>1.2 Initiate focused public communications in different media about the EMP and its contents</td>
<td>Moderate</td>
<td>Park management, TMMTB Forum</td>
</tr>
<tr>
<td>1.3 Circulation of the final EMP to all registered I&amp;AP’s and current holders of recreational permits.</td>
<td>Moderate</td>
<td>Park management</td>
</tr>
<tr>
<td>1.4 Development of a pamphlet sheet depicting the approved routes, and the code of conduct to accompany the issue of recreational permit.</td>
<td>High</td>
<td>Park management</td>
</tr>
<tr>
<td>1.5 Communicate the agreements contained in, and responsibilities for, the EMP to all affected Park staff</td>
<td>High</td>
<td>Park management</td>
</tr>
<tr>
<td>1.6 ‘Post’ the updated EMP on the Park and user group websites</td>
<td>Moderate</td>
<td>Park management</td>
</tr>
<tr>
<td>2. Trail safety and maintenance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.1 Undertake maintenance of trails by accredited persons in accordance with an approved maintenance programme.</td>
<td>On-going</td>
<td>Park management, TMMTB Forum</td>
</tr>
<tr>
<td>2.2 Tracks must be mapped and inspected to determine stability, alignment, erosion potential and rider safety</td>
<td>On-going</td>
<td>Park management, TMMTB Forum</td>
</tr>
<tr>
<td>2.3 Update SANParks approved signage manual for MTB Signage e.g. direction, trail difficulty</td>
<td>Moderate</td>
<td>Park management, TMMTB Forum</td>
</tr>
<tr>
<td>2.4 All routes should be rated in terms of the Risk Guidelines for South Africa Trail Managers</td>
<td>Moderate</td>
<td>Park management, TMMTB Forum</td>
</tr>
<tr>
<td>2.5 There should be a consistent approach to signage complying with SANParks signage guidelines and signage conventions applicable to mountain biking;</td>
<td>On-going</td>
<td>Park management, TMMTB Forum</td>
</tr>
<tr>
<td>2.6 A risk management plan shall be compiled by the TMMTB Forum in conjunction with TMNP, Mountain Rescue and City of Cape Town to cover incidents such as serious injury and fire.</td>
<td>High</td>
<td>TMMTB Forum</td>
</tr>
<tr>
<td>3. Activity Permit and self-regulation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.1 Educate and awareness of permit requirement</td>
<td>On-going</td>
<td>Park management, TMMTB Forum</td>
</tr>
<tr>
<td>3.3 Investigate the use of proposed bike boards.</td>
<td>Moderate</td>
<td>Park management, TMMTB Forum</td>
</tr>
<tr>
<td>4. Ongoing communication, education and awareness of EMP</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.1 Conduct a communication strategy including:</td>
<td>High</td>
<td>Park management, TMMTB Forum</td>
</tr>
<tr>
<td>Activity</td>
<td>Priority</td>
<td>Responsibility</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
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<td>-------------------------</td>
</tr>
<tr>
<td>Permits; Behaviour; Safety and risk; and Signage and way finding.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.2 On-going information made available to South African cycling publications, e.g. Bicycling, Ride, Tread, Full SUS, and in local weekend, daily and community newspapers.</td>
<td>On-going</td>
<td>Park management TMMTB Forum</td>
</tr>
<tr>
<td>4.3 Consideration should be given to employing social and digital media specialist for communicating with cyclists.</td>
<td>Low</td>
<td>Park management TMMTB Forum</td>
</tr>
</tbody>
</table>

**REFERENCES**

1. Amarider Risk Guidelines, 2013
3. International Mountain Biking Association, 2004
5. International Mountain Biking Association, 2008
6. Table Mountain National Park, 2008. DRAFT Environmental Management Programme for Mountain Biking in the Table Mountain National Park – Revision 3
8. Table Mountain National Park: Park Management Plan (in process)

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Ends
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## Annexure A

### Activity suitability per Conservation Development Framework Zonation

<table>
<thead>
<tr>
<th>Recreational Activities</th>
<th>Hiking</th>
<th>Walking</th>
<th>Running</th>
<th>Bouldering</th>
<th>Dog walking</th>
<th>Traditional &amp; Free Climbing</th>
<th>Sport Climbing</th>
<th>Hang &amp; Paragliding</th>
<th>Horse-Riding</th>
<th>Mountain Biking (MTB)</th>
<th>Notes</th>
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<tbody>
<tr>
<td>REMOTE WILDERNESS</td>
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<td>✓</td>
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<tr>
<td>REMOTE</td>
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<td>✓ ✓</td>
<td>✓ ✓</td>
<td>✓ ✓</td>
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</tr>
<tr>
<td>LOW INTENSITY LEISURE</td>
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</tr>
</tbody>
</table>

✓ Suitable under management conditions
✓✓ Very suitable

Note: If an activity is not listed in the table, then it is not usually permitted in the TMNP.
Annexure B

Current and proposed cycle routes

Route Map 1: Western Seaboard
Route Map 2: Table Mountain Trails
Route Map 3: Newlands to Constantia Nek
Route Map 4: Tokai
Route Map 5: Silvermine
Route Map 6: Jonkersdam to Red Hill
Route Map 7: Cape of Good Hope
### Annexure C

**TMNP Cycling EMP review – stakeholder user groups**

<table>
<thead>
<tr>
<th>Stakeholder Group</th>
<th>Met with</th>
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<tr>
<td><strong>Horse Riding</strong></td>
<td></td>
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<tr>
<td>Tokai District Riding Association</td>
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<tr>
<td>Glencairn Equestrian Centre</td>
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<tr>
<td>Hout Bay Riders Club,</td>
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<tr>
<td>Red Hill Riding Association</td>
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<td>Noordhoek Riding Association</td>
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<td>Hout Bay Equestrian Association</td>
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<td>Hout Bay Equestrian Society</td>
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<tr>
<td><strong>Hiking</strong></td>
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<tr>
<td>Mountain Club of SA</td>
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<td>Cape Province Hiking Club</td>
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<td>Western Province Hiking Club</td>
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<tr>
<td>Hikers Network</td>
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<td>Peninsula Ramblers</td>
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<tr>
<td><strong>Trail Running</strong></td>
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<td>WP Trail Running</td>
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<tr>
<td><strong>Walking with dogs</strong></td>
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<tr>
<td>Friends of Dog Walkers</td>
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<tr>
<td><strong>General</strong></td>
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<tr>
<td>Friends of Tokai Park</td>
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<tr>
<td>Friends of Silvermine</td>
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<td>Friends of Lions Head</td>
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<td>City of Cape Town: EKM</td>
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<tr>
<td>Patricia (Pixie) Littlewort</td>
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<tr>
<td>Cape Pine</td>
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</table>