

	<p>under other headings, some form of holistic grouping should be applied to link these sites specifically to the cultural practices of the Khoi-Khoi and San. Even if they are repeated elsewhere, they are too loosely defined in the present form of categorisation. Other items under a possible category relating to the Khoi-San would be Indigenous burial sites, footpaths, all archaeological sites (especially fish traps) and landmarks.</p> <p><u>6.3 Legal Requirements:</u></p> <p>The Occoquan Cultural Council unanimously endorses the objectives of the TMNP as set out in Goal 4 and its sub-categories. It would be appreciated if an indicator that specifically outlines the relations of these objectives to the significance of the relevant resources to the Khoi-San could be built into the final document</p> <p><u>6.4 (A) (3) Stakeholder Engagement:</u></p> <p>The Cochoqua Cultural Council would be willing to engage with TMNP in the Heritage Research Forum, especially with regard to the identification and authentication of heritage resources, both existing and new. Also, we would be especially interested in a process of /re-interpretation of existing resources within the park, with specific / reference to the Khoi-San. This could pre-empt dispute resolution at a later stage.</p> <p><u>B) Spatial Priorities</u></p> <p><u>b) Researching, etc, pre-colonial heritage:</u></p> <p>Consultation in this regard is of utmost importance. Too many times in the past, the Indigenous Populations of this Province had to be satisfied with the prescriptive dissemination of information regarding their own cultural symbols. TMNP has a unique opportunity to rectify this anomaly by effective consultation and corroborative compilation of the historical content of the interpretation of heritage resources within the park. This should be regarded as a priority.</p>	<p>of Khoekhoen culture and history to finalise such information. This will need to form part of a further process with such interest groups. Further, the database has been designed in such a manner that can easily adapt categories and /or include specific references to significance to specific interests or groupings.</p> <p>In general the HRMP acknowledges the need to place greater emphasis in research and management on pre-colonial heritage, specifically the cultural history of the Khoekhoen people. This can only happen in partnership with these specific groupings. One of the priority action areas proposed for the Park's revised Strategic Management Plan (2005 to 2010) is to find resources to specifically focus on the "rediscovery", identification and celebration (including interpretation) of the Khoekhoen heritage. Your comments have assisted in emphasising this need.</p> <p>The Park acknowledges the need for inclusive process to guide research, rediscovery and interpretation of the Khoekhoen heritage resources. Further, we acknowledge your offer of assistance in such a process. We expect that the Park's Stakeholder Forum and the cultural heritage sub-committee will assist in driving this process.</p>
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<p>Liz Wheeler, Friends of the Liesbeeck River</p>	<p>The Friends of the Liesbeek regret the lateness of these comments but would like to place on record the following inclusions and comments concerning the Categories of Heritage Resources as in Box 1 on pg,6 of the HRMP Summary Report:</p> <p>Landscapes: Include ecological systems & biomes as they are part of our heritage and a holistic approach is needed.</p> <p>Landscape Features: Include streams, rivers, waterfalls & wetlands. Likewise they are part of our heritage. This section should come after the Landscapes section.</p> <p>Geological Sites: Include particular rocks eg. Breakfast Rock on the Saddle</p> <p>Memorials: Put this section after Graves and Burial Grounds.</p> <p>Military Installations: Include associated buildings eg. barracks/sleeping quarters etc.</p> <p>Industrial Infrastructure: Mention should be made of the Waterworks Museum and any other museum.</p> <p>Lookout posts and huts should also be included. It is with regret that we see that the Noordhoek fire lookout in Silvermine has been destroyed.</p> <p>Routes: Include rock climbs, beacons, cairns and signs.</p> <p>Religious / Spiritual Places: There are boulders on Signal hill which are said to have spiritual significance. These should be mentioned and there may be others. Refer to Dr Cyril Hromnik.</p> <p>Shipwrecks: Shouldn't the beaches or parts thereof on which the wrecks lie also be included?</p>	<p>See Box 1. The entire CPPNE as well as the Marine Protected Area are seen as the natural heritage resource elements</p> <p>Agreed. This has been captured under natural landscapes and landscape features on the database.</p> <p>Is included in database</p> <p>See reordering</p> <p>Are included in the database</p> <p>Are included</p> <p>These type of features have been included in the database.</p> <p>Climbs have not been mapped but exist in other databases and will be managed in partnership with the mountain clubs, geomatic features are captured.</p> <p>This is work in progress. See recommendations on spiritual sites. Section 6.</p> <p>The shipwrecks are recorded as sites and have buffer zones around them. The MPA will be included in its entirety for the nomination as a</p>
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	<p>Some of the inclusions may have been mentioned under other plans or inventories. If so they should be cross referenced.</p>	<p>National Heritage Site.</p> <p>The database includes a reference section</p>
<p>Dave Cowley, Houtbay & Llundudno Heritage Trust</p>	<p>Unfortunately none of the following downloads were accessible to us from the TMNP site and it would appear that there is some technical problem. Other reports from the site were accessible but none of the Heritage Resources reports could be accessed. They are -</p> <p style="text-align: center;">Draft Heritage Resources Management Plan- September 2004 Download (921Kb PDF) Summary (282Kb PDF) Appendix 1 Description of Stakeholder involvement (57Kb PDF) Appendix 2 Population ASP Heritage Capture Form (524Kb PDF)</p> <p>We do however, have a copy of the comprehensive Heritage Resources Synthesis Map, Report and Discussion Document, which was prepared by the 'Heritage Landscape Group' and submitted to the Park in Nov 2000 which we found to be a well prepared basis for a Management Plan.</p> <p>However, comparing the summary HRMP, received by post, with it, we found the HRMP summary difficult to read and thus difficult to interpret. We suspect that as a result it may well be equally difficult to apply and measure its success. We agree that a broad brush stroke out line policy is necessary, but in reality, the conservation of heritage sites is the objective of the exercise and each site will require a different approach. There is no such thing as a 'one size fits all'.</p> <p>We agree that a broad brush stroke out line policy is necessary, but in reality, the conservation of heritage sites is the objective of the exercise and each site will require a different approach. There is no such thing as a 'one size fits all'.</p> <p>We noted that whilst 27 Heritage areas were shown on the map only 16 were mentioned in the Draft HRMP. Whilst we accept that some rationalisation within the grouping of sites may be necessary, it appears that sites such as Signal Hill, the Apostle Battery and Chapmans Peak</p>	<p>We regret this but confirm that the documents were available from the website or via the contact details provided on the letter and summary.</p> <p>The 16 sites mentioned are those suggested for priority action in the future and do not represent the full number of sites and features captured in the database.</p>

	<p>Drive have been omitted and are surely worthy of individual mention which leaves one to wonder how many other sites have been overlooked.</p> <p>We are also aware that special investigations and costly reports have already been commissioned by the Park for Signal Hill and the Northern section of Table Mountain. Similarly Constantia Nek has also been the subject of investigations. As they are not listed , are we to assume that these areas are excluded from the Plan? Clearly this is not the case.</p> <p>Section 5 of the Draft HRMP (Co-operative Governance and Partnerships for heritage resource management) in its final paragraph refers to Section 5 of the HRMP“summarised below”. The summary comments are omitted thus rendering an important paragraph meaningless.</p> <p>Hard experience within our own community convinces us that our heritage remains extremely threatened and we feel that the current structures to safeguard it are inadequate. Whilst we applaud the Park’s intention to be as transparent as possible and to base its actions on solid research, we feel that we are suffering from ‘paralysis by analysis’ which could be avoided by good informed management taking the lead and forming partnerships with community organisations who would like to stem the destruction of our heritage that continues to take place.</p> <p>We believe that the processes required to conserve heritage sites should be much simpler than those required to destroy them. This is not currently the case and hopefully the complicated framework which the HRMP outlines will not perpetuate that unfortunate situation.</p> <p>There are however a few questions of a practical nature that we would like answered at an early stage.</p> <ol style="list-style-type: none"> 1. Will the park insure its heritage assets against the obvious risks to which they are exposed? <p>Rationale: It is difficult to put a ‘financial value’ on heritage sites, however, normal risks such as fire, destruction by vandalism, theft and desecration, require restoration and making good to arrest further decay. Unless this is done our heritage will be lost. To be able to do it costs money in the form of guaranteed funding.</p>	<p>We have included a set of areas (16) currently prioritised. The HRMP identifies areas to be prioritised over the next five years – i.e. those areas that have not yet received attention. For clarity we have included the list of areas already receiving attention.</p> <p>See section 6.5 A: sub section 3 of the summary circulated.</p> <p>The study outputs have responded directly to the terms of reference as described by SANParks and their partners. It is anticipated that further evolution of the implementation plan will follow.</p> <p>Certain buildings are insured – but not all. Usually only buildings that are being used and are recorded as assets of SANParks.</p>
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	<p>2. Will the Park, as owner or custodian of some of our country's heritage assets, be liable to make good any damage to sites in terms of the regulations of the NHRA ?</p> <p>Rationale: Whilst it is conceivable that the Park may elect to underwrite its own losses, it must therefore undertake to make good any damage to heritage sites damaged as a result of risks in (1) and make provisions for the timely repair or restoration of heritage sites or objects damaged as a result of whatever risk they were exposed to.</p> <p>3. Some of the sites will have clear linkages with other sites outside the Park which should share a common conservation policy. How will this be achieved?</p> <p>Rationale: Some Heritage assets clearly fall into this category, and a common policy should be adopted to ensure that the sites are sympathetically treated and that co-operation is ensured between the owners or custodians of the sites.</p> <p>4. How will the maintenance of all the GIS systems be synchronised?</p> <p>Rationale: We are not convinced of the wisdom of creating multiple Heritage GIS systems and databases. Multiple systems which define the same things create data integrity problems unless they are maintained from one source. It would seem that there is a case for the rationalisation of the Heritage Layer for all systems ie TMNP, SAHRA, HWC, CTCC and SPA.</p> <p>We have taken the liberty of appending some additional comment (Appendix 1) which does not necessarily relate to the draft HRMP but makes suggestions on a broader scale as to how a sustainable Heritage Conservation Program could be achieved.</p> <p>We would like to underscore our commitment to work with the Park as effectively as possible and to ensure the conservation, safety and integrity of our shared heritage.</p>	<p>This is possible should SAHRA enforce a compulsory repair order.</p> <p>The Inventory and associated GIS has linked associated or contiguous elements, however SANParks is only responsible for resources within their jurisdiction. The coherent policies will be enabled through partnerships with the relevant agencies.</p> <p>SANParks will be responsible for maintaining all relevant information. See section 6.2.4 in recommendations.</p> <p>We thank you for your valuable insights.</p>
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<p>CJ van der Spuy, Llundudno Civic Association</p>	<p>To be honest in the time available we were not able to read the full report and rely only on the Summary Report. Furthermore the writer read it once and found it to be repetitive and also difficult to comprehend . Really this sort of document is not going to stimulate the interest of the ordinary man in the street ,but perhaps that is not your objective, although it certainly should be for the reasons we point out below. .</p> <p>I have no doubt that a great deal of time and effort and expense has gone into this vital and critical project and you are to be commended for the initiative .</p> <p>As GENERAL COMMENT I believe that it is imperative for you to engender as much public interest in the subject of Heritage and Cultural resources .Not easy to do taking into account that the subject matter is often parochial and limited to a small number of people You must therefore try and popularise heritage resources by keeping it simple and understandable, if not exiting and romantic eg. the firing of the Hout Bay East Fort Cannons</p> <p>As the resources to drive and manage the interest and preservation of Heritage sites is presumably very limited I feel that the Park should go all out to encourage the formation of groups of interested people to adopt a heritage Resource /Site eg in the nature of the various "Friends" groups and adopt a "Patch " Beach etc This is where the function of your Officer especially appointed to engender this type of co-operation becomes so important and also this matter should constantly be exposed to the Advisory Forum . This should naturally lead to some sponsorship support. Your Report does not in my opinion sufficiently focus on this approach .</p> <p>SPECIFIC COMMENT In box 2 on Page 11 in the list of identified priority Resources /Sites you have omitted the following very important and urgent ones viz Apostle Battery (Llandudno) Sandy Bay The Military Magazine in Tamboerskloof Koeel Bay (Chapmans Peak)</p> <p>Chapman's Peak Drive (long overdue for Proclamation as a Grade 1 Site) In Our opinion these are sites that urgently require protection and in some form or other are already being threatened</p>	<p>This document is to inform the public about the TMNP's management activities.</p> <p>This document has been produced at the end of a two-year process engaging the public. See section and appendix on stakeholder involvement. 6.2.3</p> <p>Agreed. This will be part of the Park Forum's Heritage working group's role in the future.</p> <p>See list of current priorities that are being addressed or have/are receiving attention. Please note that the priorities identified are those for the next five years. These were identified because they had not yet received planning attention. Note that the SANParks has no jurisdiction over the Military Magazine in Tamboerskloof as this is PWD responsibility.</p>
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	We ask that You please keep us informed and it would be appreciated if you would also comment on "Our Comments "by written reply	
Doug Cole, Council for Geoscience: Western Cape	<p>I have perused your Heritage Resources Management Plan document and was responsible for original input of the mines, quarries and geology. I assume that in Box 2 - Spatial Priorities, Manganese mining refers to both the adits and spoil heaps on the mountainside and the old loading jetty below the East Fort. We already have an informative plaque on the manganese mine at Fishermans Wharf, Hout Bay and it would be very useful to rehabilitate the old adits, which are presently in a dangerous condition.</p> <p>I would recommend that you add the Vredehoek Tin mine to your Spatial Priorities in Section 1 Devils Peak. It was worked between 1911 and 1912 and is the largest preserved underground mine in the Western Cape. The horizontal adit is about 90 metres long and is still safe for access. The remains of the flumes are present outside the mine. Professor Peter Spargo has written two reports on this mine (Telephone 021-686-4289).</p>	<p>The GIS system includes buffer zones around specific resources which accommodates associated features.</p> <p>SANParks will be prioritizing actions related to heritage resources in the TMNP SMP.</p> <p>SANParks will be prioritizing actions related to heritage resources in the TMNP SMP.</p>
I B Allan. Simon's Town Civic Assoc.	<p>Your letter dated 27th Aug refers.</p> <p>I regret that I had difficulty in downloading the full document from your website.</p> <p>While it may not be prioritised I would seek confirmation that note has been taken of my comments of several months ago concerning the following on Elsie's Peak.</p> <p>1) The presence of the ruins of what is thought to be the explosive store for the quarry above Fish Hoek built in the 1890's.</p> <p>2) The paper prepared by Mr GA Randle, Dept of Civil Engineering, Cape Technikon in 2001 on this quarry and lodged with the Fish Hoek Museum. The presence in the Museum of many artifacts taken from this site.</p>	<p>We regret this but confirm that the documents were accessible.</p> <p>We regret that such comments were not received by the consultant team.</p> <p>A buffer distance is set around the identified quarry, however this detailed information has not been captured for this site.</p> <p>SANParks will be maintaining the database and this information will be included in due course.</p>

	<p>3) The presence across the saddle between Fish Hoek and Glencairn Heights of the original track connecting the two and thought to have been constructed in the late 1700's.</p> <p>These all became very noticeable following the fire in 1999 but are now rapidly disappearing again under the fynbos.</p>	<p>The addition of this information has suggested as an example for use in staff training in updating the database. The consultant team have offered to include this information within such a training session after the conclusion of the project, if necessary.</p>
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