Table Mountain National Park

Revised Draft: Park Management Plan

Stakeholder Engagement, Comments & Responses Report

July 2015
This report is the accompanying report to the Revised Draft Table Mountain National Parks’ Park Management Plan for the period 2015-2025.

The report includes the comments received from Authorities and stakeholders on the Draft TMNP PMP released for public and authority comment on the 16 February 2015.

This report is submitted with the Revised Draft TMNP PMP to the Department of Environmental Affairs (DEA) Technical Review Committee.

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Acronyms

CDF | Conservation Development Framework
CFRPAWS | Cape Floral Region Protected Area World Heritage Site
CoCT | City of Cape Town (the City)
CPPNE | Cape Peninsula Protected Natural Environment
CRC | SANParks Cape Research Centre
DEA | Department of Environmental Affairs
DEAT | Department of Environmental Affairs and Tourism
EMP’s | Environmental Management Programmes
FDW | Friends of the Dog Walkers
HoA | Heads of Agreement (between SANParks and the City of Cape Town)
HWC | Heritage Western Cape
IDP | Infrastructure Development Plan (of the City of Cape Town)
METT | Management effectiveness Tracking Tool
MPA | Marine Protected Area
MTB | Mountain Biking
NEM:BA | National Environmental Management Biodiversity Act
NEM:PAA | National Environmental Management Protected Areas Act
NEMA | National Environmental Management Act
NHRA | National Heritage Resources Act
NMT | Non-motorised transport
PAIA | Promotion of Access to Information Act
PMFA | Public Management Finance Act
PMP | Park Management Plan
SANBI | South African Biodiversity Institute
SANParks | South African National Parks
SAHRA | South African Heritage Recourses Agency
TDRA | Tokai District Riding Association
TMNP | Table Mountain National Park
UNESCO | United Nations Educational, Scientific and Cultural Organization
WHS | World Heritage Site
1. Introduction
The Table Mountain National Park was proclaimed on the 28 May 1998 and in terms of the National Parks Act. The first park management plan was developed in 2000 and comprised a Park Policy and Strategic Management Plan. This was approved by SANParks and endorsed by the City of Cape Town. SANParks has submitted a management plan to the then DEAT in November 2006 as required by the National Environmental Management: Protected Areas Act (NEM:PA) No. 57 of 2003.

In compliance with NEM:PA, SANParks has initiated a process to revise the Table Mountain National Park’s Management Plan. The process undertaken broadly follows the adaptive management planning process which entails developing a desired state, supported by hierarchy of objectives and reviewing the park zonation and lower level plans to reflect the required changes.

Section 39(3) of NEM:PA requires that all persons who may be interested or affected by a management plan for a Protected Area be given the opportunity to participate in, or comment on the Plans. Section 41(2e) of NEM:PA states that a management plan for a Protected Area must contain at least procedures for public participation, including participation by the owner (if applicable), any local community or other interested party.

The stakeholder engagement strategy was developed in-line with the requirements of SANParks guidelines for stakeholder engagement and Chapter 5 of the National Environmental Management Act (Act 107 of 1998).

This report is submitted as a record of the formal comments from stakeholders on the First Draft PMP along with the Revised Draft TMNP PMP to the Department of Environmental Affairs (DEA) Technical Review Committee.
2. Stakeholder engagement strategy

2.1 Stakeholder engagement objectives
The objectives of the stakeholder engagement process are to:

- Create a channel for the accurate and timely dissemination of information to interested and affected stakeholders;
- Create the opportunity for communication between SANParks and the public;
- Promote opportunities for the building of understanding between different parties;
- Provide the opportunity for stakeholders to give meaningful input into the decision-making processes that drive the development of the Park Management Plan;
- Ensure that methodologies accommodate the context of the issue at hand and the availability of resources (people, time, money) and do not conflict with these objectives.

2.2 Stakeholder engagement approach
The approach to the stakeholder engagement process is based on the principles embodied in the following legal framework:

- National Environmental Management Act No. 107 of 1998 (NEMA); and
- The National Environmental Management: Protected Areas Act No.57 of 2003 as amended by the National Environmental Management: Protected Areas Act No.31 of 2004.

In addition to the above legal framework, the stakeholder process was developed with the Guiding Principles for SANParks Stakeholder Participation in mind. SANParks thus undertakes to:

- Seek to notify stakeholders of participation processes through appropriate mechanisms.
- Ensure that the process provides the opportunity for input from all stakeholders within reasonable timeframes, emphasising the sharing of information, joint-learning and capacity building.
- Promote participation by stakeholders through timeous and full disclosure of all relevant and appropriate information.
- Provide feedback on the outcome of the process to stakeholders and demonstrate how their inputs have been considered in the decision making process.
- Give particular attention to ensuring participation by marginalised communities, communities with specific concerns, or communities that have contractual rights in the national park.
3. The stakeholder engagement process
The stakeholder engagement process was divided into two phases. The first phase was the participation in workshops and meetings by various Authorities and civil society stakeholders to review the current Park Management Plan (2008-2013). These includes a review of the Desired State of the Park (July 2014) and a review of the Core Programmes of the Park (July – August 2014).

The second phase is a wide reaching open Authority and public process where comments on the first draft of the reviewed Park Management Plan (2015-2025) are collected, considered and responded too. The ‘call for comments’ to the review the Park Management Plan was advertised in national and local newspapers, SANParks website, TMNP offices, local libraries and at various locations within the Park. Stakeholders were able to register on the SANParks website, at various Park offices and at 10 public information sessions. At the public information sessions days, stakeholders were given a chance to directly interact with Park management.
Figure 1: Table Mountain National Park: Park Management Plan (PMP) 2015 – 2025 Review Process

<table>
<thead>
<tr>
<th>Stage</th>
<th>Activity</th>
<th>Stakeholder</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>City of Cape Town Special Meeting</td>
<td>CoCT</td>
<td>May 2014</td>
</tr>
<tr>
<td></td>
<td>Review of Park Vision, Attributes, SWOT, High Level Objectives (June 2014)</td>
<td>SANParks/Round Table</td>
<td>Jun 2014</td>
</tr>
<tr>
<td></td>
<td>Biodiversity Objectives Actions (June)</td>
<td>SANParks Authorities Specialists</td>
<td>Jun – Aug 2014</td>
</tr>
<tr>
<td></td>
<td>Heritage Objectives Actions (July)</td>
<td>SANParks</td>
<td>Jun – Aug 2014</td>
</tr>
<tr>
<td></td>
<td>Tourism Objectives Actions (August)</td>
<td>People &amp; Conservation Objectives</td>
<td>Jun – Aug 2014</td>
</tr>
<tr>
<td></td>
<td>Planning Objective Actions (June)</td>
<td>Actions (July-Aug)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Governance Objective Actions (July-Aug)</td>
<td>SANParks</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Finance Objective Actions (July-Aug)</td>
<td>SANParks</td>
<td></td>
</tr>
<tr>
<td></td>
<td>HR Objective Actions (July-Aug)</td>
<td>CoCT</td>
<td>Aug 2014</td>
</tr>
<tr>
<td></td>
<td>Conservation Development Framework: Visitor Sites, Zonation, Activities</td>
<td>SANParks</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(August 2014)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>City of Cape Town Special Meeting</td>
<td>CoCT</td>
<td>Aug 2014</td>
</tr>
<tr>
<td></td>
<td>Costing and Resource Determination</td>
<td>SANParks</td>
<td>Dec 2014</td>
</tr>
<tr>
<td></td>
<td>SANParks briefing</td>
<td>SANParks</td>
<td>Oct - Dec 2014</td>
</tr>
<tr>
<td></td>
<td>City of Cape Town Special Meeting</td>
<td>CoCT</td>
<td>Dec 2014</td>
</tr>
<tr>
<td></td>
<td>Draft PMP for Comment</td>
<td>SANParks Authorities Public</td>
<td>Feb – Jul 2015</td>
</tr>
<tr>
<td></td>
<td>Comments and Responses Report</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>City of Cape Town Special Meeting</td>
<td>CoCT</td>
<td>Feb 2015</td>
</tr>
<tr>
<td></td>
<td>Park Management Plan for Submission to SANParks, DEA and Minister</td>
<td>SANParks</td>
<td>July 2015</td>
</tr>
</tbody>
</table>
4. Stakeholder identification, registration and meetings

In total 127 people and organisations formally registered as stakeholders through the SANParks website, various Park offices or at the 10 public information sessions.

4.1 Stakeholder identification and invitation

Various Authorities, organisations, civil society groups, subject matter experts, Park users, Park visitors and the general public were identified and invited to participate in the Park Management Plan revision process (Table 1). The government departments were at national, provincial and local level with the intention to show that, in terms of the spirit of cooperative governance SANParks has approached these parties. All the stakeholders that were registered during the 2006 management plan revision process was informed (via e-mail and telephonically) of the intention to revise the TMNP management plan during 2014 and 2015.

Table 1: Stakeholders identified and invited to participate in the revision of the TMNP Park Management Plan

<table>
<thead>
<tr>
<th>Constituent</th>
<th>Authority / Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Government</td>
<td>City of Cape Town</td>
</tr>
<tr>
<td>Provincial Government</td>
<td>Heritage Western Cape, CapeNature</td>
</tr>
<tr>
<td>National Government</td>
<td>SANBI, SAHRA, Oceans to Coasts</td>
</tr>
<tr>
<td>Contractual partners</td>
<td>TMACC, Cape Point Partnerships</td>
</tr>
<tr>
<td>Tertiary Institutions</td>
<td>University of Cape Town, University of the Western Cape, University of Stellenbosch</td>
</tr>
<tr>
<td>Honorary Rangers</td>
<td>Yes</td>
</tr>
<tr>
<td>Contracted Landowners</td>
<td>Yes</td>
</tr>
<tr>
<td>Visitors to Parks</td>
<td>Yes</td>
</tr>
<tr>
<td>Previously registered stakeholders</td>
<td>Yes</td>
</tr>
<tr>
<td>Park recreational user groups</td>
<td>Walkers with dogs, Mountain bikers, Horse riders, climbers.</td>
</tr>
<tr>
<td>Local Resident Rate Payers Associations</td>
<td>Athlone Crawford Civic Association, Atlantis Residents’ Association, Barbarossa Residents Association/Group, Belgravia Civic Association, Belthorn Crawford Civic Association, Belvedere Civic Association, Bergvliet Meadow Ridge Ratepayers Association, Bishopscourt Residents’ Association (BCRA), Bishop Lavis Residents Association, Bishopscourt Village Residents’ Association (BVRA), Bloubergstrand Residents’ Association, Bo-Kaap Civic and Ratepayers Association, Bridgetown Civic Association, Brooklyn, Ysterplaat &amp; Rugby Residents’ Association (BYRA), Camps Bay Ratepayers and Residents Association (CBRA), City Bowl Ratepayers &amp; Residents’ Association (CBRA), Coniston Park Ratepayers’ and Residents’ Association, Constantia Property Owners Ratepayers Association (CPOA), Constantia Hills Residents Association, De Waterkant Civic</td>
</tr>
</tbody>
</table>
Table 1: Stakeholders identified and invited to participate in the revision of the TMNP Park Management Plan

<table>
<thead>
<tr>
<th>Constituent</th>
<th>Authority / Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Research</td>
<td>SAEON</td>
</tr>
</tbody>
</table>
Table 1: Stakeholders identified and invited to participate in the revision of the TMNP Park Management Plan

<table>
<thead>
<tr>
<th>Constituent</th>
<th>Authority / Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conservation Organisations</td>
<td>Table Mountain Fund, WWF-South Africa, Wildlife and Environmental Society South Africa (WESSA),</td>
</tr>
<tr>
<td>NGOs</td>
<td>CPFPA, SA First People’s Museum Foundation, Cape Mazaar Society, Cape Heritage Trust, Simon van der Stel Foundation, Friends of Constantia Green Belts, Botanical Society, Environmental Monitoring Group, SEEP, SA First People’s Museum Foundation.</td>
</tr>
<tr>
<td>Tourist Associations</td>
<td>WESGRO</td>
</tr>
<tr>
<td>Active members of Civil Society</td>
<td>Various</td>
</tr>
</tbody>
</table>

4.2 Media platforms used to invite stakeholders to register and participate
A variety of traditional and contemporary media platforms were used to engage stakeholders in an effort to inform of the revision of the Park Management Plan and invite stakeholders to participate.

Table 2: The various media platforms used to inform stakeholders of the revision of the TMNP Management Plan revision.

<table>
<thead>
<tr>
<th>Media</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Direct e-mail</td>
<td>All the stakeholders that were registered during the 2006 management plan revision process were informed via e-mail.</td>
</tr>
<tr>
<td>2. Media advertisements</td>
<td>Advertisements to inform interested and affected parties to comment on draft park management plan and request to register were place in the following national newspapers on the 15-02-2015 and 29-03-2015:</td>
</tr>
<tr>
<td></td>
<td>- Sunday Times</td>
</tr>
<tr>
<td></td>
<td>- Rapport</td>
</tr>
<tr>
<td></td>
<td>Advertisements to inform interested and affected parties to comment on draft park management plan and request to register were place in the following local community newspapers appeared in the week of 16-02-2015 and 25-03-2015:</td>
</tr>
<tr>
<td></td>
<td>- Athlone News</td>
</tr>
<tr>
<td></td>
<td>- Atlantic Sun</td>
</tr>
<tr>
<td></td>
<td>- False Bay Echo</td>
</tr>
<tr>
<td></td>
<td>- Southern Suburbs Tatler</td>
</tr>
<tr>
<td></td>
<td>- Constantiaberg Bulletin</td>
</tr>
<tr>
<td></td>
<td>- Plainsman</td>
</tr>
<tr>
<td></td>
<td>- City Vision</td>
</tr>
<tr>
<td>3. Registration at public meetings</td>
<td>Participants were also able to register at the following meetings listed in Table 6.</td>
</tr>
<tr>
<td>4. Community Radio</td>
<td>Announcements to invite interested and affected parties to comment</td>
</tr>
</tbody>
</table>
Table 2: The various media platforms used to inform stakeholders of the revision of the TMNP Management Plan revision.

<table>
<thead>
<tr>
<th>Media</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>on the draft park management plan and request to register were aired on the following radio stations:</td>
</tr>
<tr>
<td></td>
<td>• Good Hope FM</td>
</tr>
<tr>
<td></td>
<td>• Heart 104.9 FM</td>
</tr>
<tr>
<td></td>
<td>• KFM</td>
</tr>
<tr>
<td></td>
<td>• Bush Radio</td>
</tr>
<tr>
<td></td>
<td>• CCFM</td>
</tr>
<tr>
<td></td>
<td>• Radio Tygerberg</td>
</tr>
<tr>
<td></td>
<td>• Zibonele Community Radio (Khayelitsha)</td>
</tr>
<tr>
<td></td>
<td>• Smile FM</td>
</tr>
<tr>
<td></td>
<td>• Voice of the Cape</td>
</tr>
<tr>
<td>5. Internet</td>
<td>Stakeholders visiting SANParks website were ask to register from 16 February 2015.</td>
</tr>
<tr>
<td>6. Social Media</td>
<td><a href="https://www.facebook.com/pages/SANParks-Table-Mountain-National-Park/150290898378136">https://www.facebook.com/pages/SANParks-Table-Mountain-National-Park/150290898378136</a></td>
</tr>
<tr>
<td>7. Community Notice Boards</td>
<td>Official Notices were place at 15 Community Notice Boards around and adjacent to the Park.</td>
</tr>
</tbody>
</table>

4.3 Desired State workshop

The independently facilitated Desired State workshop took place on the 04 July 2014. A range of specialists, stakeholders and SANParks management participated in the review and update of the Desired State of the Park which entailed reviewing the Park Mission, Attributes and high level objectives that forms the basis of the management plan.

Table 3: Desired State Workshop

<table>
<thead>
<tr>
<th>Activities</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Invitations</td>
<td>Formal invitations were sent to 32 active members of civil society Park management and SANParks specialists.</td>
</tr>
<tr>
<td>Desired State Workshop</td>
<td>The workshop took place on 04 July 2014 at the SANParks Cape Research Centre.</td>
</tr>
<tr>
<td>Attendance:</td>
<td>Thirty one participants (15 stakeholders and 16 SANParks staff members) partook, representing the following constituencies:</td>
</tr>
<tr>
<td></td>
<td>• University of Cape Town</td>
</tr>
<tr>
<td></td>
<td>• Table Mountain Fund</td>
</tr>
<tr>
<td></td>
<td>• Simon van der Stel Foundation</td>
</tr>
<tr>
<td></td>
<td>• Cape Heritage Trust</td>
</tr>
<tr>
<td></td>
<td>• Cape Mazaar Society</td>
</tr>
<tr>
<td></td>
<td>• University of the Western Cape</td>
</tr>
<tr>
<td></td>
<td>• Wildlife and Environment Society of South Africa</td>
</tr>
<tr>
<td></td>
<td>• SA First People’s Museum Foundation</td>
</tr>
</tbody>
</table>
### Table 3: Desired State Workshop

<table>
<thead>
<tr>
<th>Activities</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Botanical Society</td>
<td></td>
</tr>
<tr>
<td>• Individual Capacity</td>
<td></td>
</tr>
<tr>
<td>• SANParks.</td>
<td></td>
</tr>
</tbody>
</table>

#### 4.4 Stakeholder focus group meetings

These are meetings called with constituencies to discuss critical components that are essential in the Park Management Plan that required additional specialised input from subject matter experts.

### Table 4: Stakeholder focus group meetings held during the revision of the TMNP Management Plan.

<table>
<thead>
<tr>
<th>Group</th>
<th>Purpose</th>
<th>Attendants</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biodiversity Management</td>
<td>Review Biodiversity Objectives and Actions</td>
<td>A total of 56 people were invited with 34 attending.</td>
<td>24 June 2014</td>
</tr>
<tr>
<td>Heritage Management</td>
<td>Review Heritage Objectives and Actions</td>
<td>A total of 41 people were invited with 19 people attending.</td>
<td>31 July 2014</td>
</tr>
<tr>
<td>Tourism Management</td>
<td>Review Tourism Objectives and Actions</td>
<td>A total of 42 people were invited with 28 people attending</td>
<td>11 August 2014</td>
</tr>
<tr>
<td>Tourism Management</td>
<td>Review Tourism Issues and CDF</td>
<td>City of Cape Focus Group</td>
<td>12 August 2014</td>
</tr>
<tr>
<td>People and Conservation</td>
<td>Review P&amp;C Objectives and Actions</td>
<td>A total of 20 people were invited with 8 people attending.</td>
<td>12 July 2014</td>
</tr>
<tr>
<td>Park Consolidation</td>
<td>Review land consolidation objectives and actions</td>
<td>Land Consolidation Working Group</td>
<td>05 June 2014</td>
</tr>
</tbody>
</table>
4.5 Local Authority focus group meetings
These are meetings held with the City of Cape Town to update, brief and discuss the draft PMP with City Councillors and officials.

Table 5:

<table>
<thead>
<tr>
<th>Attendees</th>
<th>Purpose</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>City Officials</td>
<td>City Focal Point Meeting</td>
<td>22 May 2014</td>
</tr>
<tr>
<td>City Councillors and Officials</td>
<td>Councillors’ Special Briefing</td>
<td>27 May 2014</td>
</tr>
<tr>
<td>City Officials</td>
<td>City Focal Point Meeting</td>
<td>29 July 2014</td>
</tr>
<tr>
<td>City Officials</td>
<td>City Focal Point Meeting</td>
<td>07 August 2014</td>
</tr>
<tr>
<td>City Councillors and Officials</td>
<td>Councillors’ Special Briefing</td>
<td>15 August 2014</td>
</tr>
<tr>
<td>City Officials</td>
<td>Executive Director Bilateral</td>
<td>01 October 2014</td>
</tr>
<tr>
<td>City Officials</td>
<td>City Focal Point Meeting</td>
<td>13 November 2014</td>
</tr>
<tr>
<td>City Councillors and Officials</td>
<td>Councillors’ Special Briefing</td>
<td>20 November 2014</td>
</tr>
<tr>
<td>City Councillors and Officials</td>
<td>Councillors’ Special Briefing Workshop</td>
<td>04 December 2014</td>
</tr>
<tr>
<td>City Officials</td>
<td>City Focal Point Meeting</td>
<td>05 February 2015</td>
</tr>
<tr>
<td>City Councillors and Officials</td>
<td>Councillors’ Special Briefing Presentation</td>
<td>13 February 2015</td>
</tr>
<tr>
<td>City Officials</td>
<td>City Focal Point Meeting</td>
<td>23 April 2015</td>
</tr>
</tbody>
</table>

4.6. Public information sessions on Draft Management Plan
Park Management prepared a formal PowerPoint presentation and 15 A1 or A0 posters explaining the Park Plan revision process and content of the draft Park Plan. For the 10 advertised public information sessions all stakeholders had an opportunity to engage directly with Park management on the Park Management Plan. The initial set of dates for the information sessions from 3rd to 7th March had to be postponed on the 4th March to new dates in April due to the wildfires which raged through the Park at the time.

Table 6: Public information sessions held in and around the Park.

<table>
<thead>
<tr>
<th>Venue</th>
<th>Date and time</th>
<th>Number of Stakeholders that attended</th>
</tr>
</thead>
<tbody>
<tr>
<td>SANParks Cape Research Centre, Upper Tokai Road, Tokai.</td>
<td>03 March 2015 (09h00 – 12h00)</td>
<td>11</td>
</tr>
<tr>
<td>Hout Bay Library, Melkhout Crescent, Hout Bay</td>
<td>03 March 2015 (15h00 – 18h00)</td>
<td>0</td>
</tr>
<tr>
<td>Rocklands Minor Hall, Cnr Spine &amp; Park Roads, Rocklands, Mitchell’s Plain</td>
<td>13 April 2015 (18h00 – 20h00)</td>
<td>0</td>
</tr>
<tr>
<td>Fish Hoek Municipal Hall, Central Circle, Fish Hoek</td>
<td>14 April 2015 (09h00 – 12h00)</td>
<td>11</td>
</tr>
<tr>
<td>Cape Town Central Library, Drill Hall, Darling Street, Cape Town</td>
<td>14 April 2015 (14h00 – 17h00)</td>
<td>6</td>
</tr>
<tr>
<td>Simon’s Town Museum, Court Road, Simons Town</td>
<td>15 April 2015 (10h00 – 13h00)</td>
<td>9</td>
</tr>
<tr>
<td>Roman Catholic Church, Pokela Road, Masiphumele</td>
<td>15 April 2015 (16h00 – 19h00)</td>
<td>1</td>
</tr>
<tr>
<td>Newlands Conference Room, Newlands Forest Station, Union Avenue (M3)</td>
<td>16 April 2015 (16h00 – 19h00)</td>
<td>18</td>
</tr>
<tr>
<td>Edith Stephens Nature Reserve, Govan</td>
<td>17 April 2015 (10h00 – 13h00)</td>
<td>0</td>
</tr>
</tbody>
</table>
Table 6: Public information sessions held in and around the Park.

<table>
<thead>
<tr>
<th>Venue</th>
<th>Date and time</th>
<th>Number of Stakeholders that attended</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mbeki Road, Philippi</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site B community hall, Khayelitsha Sulani Drive (opposite Site B SAPS)</td>
<td>18 April 2015 (09h00 – 12h00)</td>
<td>0</td>
</tr>
</tbody>
</table>

4.7: Documentation dissemination and feedback to stakeholders

The draft Park Plan was made available at the following public venues.

Table 7 Locations that the Draft Park Management Plan was available for public viewing.

<table>
<thead>
<tr>
<th>Item</th>
<th>Action</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Draft Park Management Plan for Comment placed in park offices</td>
<td>Kloof Nek office, TMNP Boulders visitor centre, TMNP Tokai Manor office, TMNP</td>
<td>16 February 2015</td>
</tr>
<tr>
<td>Draft Park Management Plan for Comment placed on SANParks Website.</td>
<td>Internet Link</td>
<td>16 February 2015</td>
</tr>
<tr>
<td>Draft Park Management Plan for comment was made available at the ten public information sessions.</td>
<td>Information Sessions</td>
<td>See Table 6</td>
</tr>
<tr>
<td>Revised Draft Park Management Plan &amp; Comments and Responses Report available to stakeholders</td>
<td>The documents will be available on the SANParks Website once approved by SANParks Exco. They will be made available to registered stakeholders by email and internet link</td>
<td></td>
</tr>
<tr>
<td>Dissemination of finalised Park Management Plan and comment and response document</td>
<td>The documents will be available on the SANParks Website once approved by the Minister. They will be made available to registered stakeholders by email and internet link.</td>
<td></td>
</tr>
</tbody>
</table>
5. Stakeholder comments

5.1 General responses to key comments

All comments received on the draft TMNP PMP are listed in this report. 36 submissions were received comprising 492 comments. Of the comments received, there were certain recurring themes in the various comments. These repeated themes are: My Activity Permit, recreational activities within the Park, the Park Forum and Park communication. General responses have been prepared on these themes, which are provided below to clarify SANParks’ approach to these common themes.

5.1.1 The “My Activity” Permit System

Numerous comments were submitted regarding ‘My Activity’ permit system for TMNP:
- Viewed as an access permit rather than a permit to undertake an activity
- Appropriateness for an ‘open access’ park
- Enforcement of the ‘My Activity’ permit
- Use of the income from the sale of the permit
- A management tool or income generator
- Highly administrative system
- Legality in terms of the Heads of Agreement
- Affordability

General Response:

The TMNP is managed as both a National Park and World Heritage Site to conserve this globally recognised biodiversity hotspot. It is in this context that SANParks accommodates a multiplicity of recreational activities and a vast number of recreational users within the Protected Area while protecting the natural and cultural environment for current users and future generations.

In response to this challenge TMNP developed, through a series of various public processes, Environmental Management Programmes (EMPs) for recreational activities such as dog walking, hang and paragliding, sport/rock climbing, horse riding and mountain biking as the management framework to manage these diverse, recreational activities in the Park that have a cumulative impact on the environment. The recreational EMPs are also prepared in the context of the Park's Conservation Development Framework (CDF) which was developed from the outset of the Park in consultation with all stakeholders including the City of Cape Town.

These EMPs generally include an overview of the current status of a recreational activity and a brief summary of impacts and issues; an environmental policy; a strategic approach to respond to impacts and issues; guidelines for implementation of the EMP; maps of the approved routes, areas and entry/exit points; a permitting system and a Code of Conduct.

The EMP’s identify the need for the designated recreational users to obtain activity permits, respect the rules and regulations of the Park, abide by the respective codes of conduct, undertake their activity with care and consideration for other users and protect and conserve the natural and heritage resources of the Park.
These EMPs introduce a code of conduct for each recreational activity to promote best practice and appropriate behaviour by Park users so as to limit impacts on the environment and supporting infrastructure and reduce potential conflicts between recreational users (e.g. bikers, dogs, horses).

The respective activity permits, sold as “My Activity Permit” can be purchased at the Tokai sales office and the Cape Town Tourism offices across the City. The baseline cost of an activity permit is pegged against the individual Wild Card rate which covers use of the Park for that activity as well the impacts associated with the activity.

It should be noted that TMNP is part of SANParks, a national organisation which manages 21 National Parks around the country and whose primary mandate is conservation. Income that the Park generates is used to fund SANParks including such conservation activities in the Park such as invasive alien plant clearing, fire management, veld rehabilitation and soil erosion etc. The contributions from sale of the Activity Permits help sustain the National Park which forms part of this system. The funds allocated to TMNP for conservation activities are far in excess of the money raised by the activity permit system.

Recreational events on a commercial basis are permitted through a different system which requires permits, an Events Environmental Management Plan to be in place and are charged accordingly.

The Activity permit is not linked to or a guarantee of, safety in the park. SANParks has a dedicated team of visitor safety officers who patrol the Park but it still remains an area entered at one’s own risk. Purchase of the activity permit is a legal requirement and not an assurance that the area is secure. Generally, it is advised that recreational users should undertake their activity in a group to provide safety in numbers.

It should be noted that Activity Permits are not access cards but permits to undertake certain high impact recreational activities in the TMNP. The Protected Areas Act and Regulations make provision for the management authority to introduce such permits in order to manage, monitor and mitigate the impacts of the activities. Activity permits are in terms of the “Regulations for the Proper Administration of Special Nature Reserves, National Parks and World Heritage Sites” which are promulgated in terms of Section 86 of the NEM:PAA. Activities listed are outlined in Sections 30, 35, 49 of the Regulations are required to be permitted by the management authority.

The Activity Permit is applicable on all land managed as part of the Park notwithstanding the particular ownership of the property. The Activity Permit system is not in conflict with the Heads of Agreement between the SANParks and the City of Cape Town as firstly, it is a legal requirement in terms of NEM:PAA and secondly, it is not an access card.
SANParks will constantly work towards improving the efficiency in the administration of the activity permit system.

Enforcement of the Permit system is both by compliance with NEM:PAA and adherence to a signed Code of Conduct which also requires a measure of self-regulation ensuring the integrity of the Park and the continued enjoyment of the recreational activity.

5.1.2 Recreational Activities / User Groups
- Recreational users are not tourists
- Separate objective from Tourism needed

General Response:
On review of the comments, SANParks agrees that a separate objective under the Responsible Tourism Programme is warranted. This has been included in Sections 5 and 10.4.

5.1.3 TMNP / Park Forum / stakeholders
Numerous comments were made regarding the Park Forum. These include:
- A Park Forum needs to be revived
- A representative Forum
- Partnership approach
- Mandatory in terms of HoA
- City / councillor representation
- Community representation
- Decision making role of a representative forum
- Dialogue between park and stakeholders

General Response:
A wide range of stakeholder forums exist (for fire, marine, user groups, research, safety, etc.) through which the Park engages the different sectors of the public. The Park Forum alone cannot achieve this to address the diverse needs of the community. It must be noted that the Park Forum was never a decision making body, but a consultative forum on behalf of the community. It is the intention of Park management to support a renewed park forum as a broad consultative community forum. See Section 10.5.
5.1.4 Park Communication

Numerous comments were made regarding the Park Communication. These include:

The need for continual, interactive, responsive, pro-active on:
- Park Issues
- Park Decisions
- Internal communication to staff

General Response:
On review of the comments, SANParks agrees that a separate communications objective under the Effective Park Management is warranted. This has been included in Sections 5 and 10.6.8

5.2 Individual comments

All comments received on the draft TMNP PMP are listed in this report. 36 submissions were received comprising 492 comments. Comments are listed verbatim with no changes. In the Responses to the comments provided below, reference to the sections, programmes and actions in the PMP refer to both the Draft PMP dated February 2015 and the Revised Draft PMP dated July 2015 unless otherwise stated.

<table>
<thead>
<tr>
<th>Comment / issue</th>
<th>1. A Pollock</th>
<th>E-mail: 17 February 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>We have been testing a new system of dealing with dog poo in TMNP, especially where car parks exist. This system is called composability and it uses a new, cellulose-based material that completely breaks down with the dog poo over some weeks in a ‘composter’ unit that is strategically placed on known dog poo routes. It will render the poo and bag to compost free of odour during this process. No human intervention is required after the dog walker deposits the bag &amp; poo in the unit.</td>
<td></td>
</tr>
<tr>
<td>Response:</td>
<td>The Park supports efforts that address and mitigate the impacts of recreational users in the Park such as the one proposed.</td>
<td></td>
</tr>
<tr>
<td>1.2</td>
<td>We are testing a mountain bike route inside the TMNP fence parallel to Rhodes Drive so as to give MTB riders safer transit From Cecilia Car Park to Constantia Neck. The proposed route is little used by walkers currently.</td>
<td></td>
</tr>
<tr>
<td>Response:</td>
<td>The opening of new routes, for all recreational EMP Activities, is done in conjunction with the stakeholders as part of the on-going review of the respective EMP’s.</td>
<td></td>
</tr>
<tr>
<td>1.3</td>
<td>Lighting the tunnel from Orange Kloof to Camps Bay using solar powered LED</td>
<td></td>
</tr>
</tbody>
</table>
lights to enable this historic tunnel to be used and appreciated by walkers.

*Response:* Limited access to the area is by a special permit for Orangekloof. The tunnel is part of this restricted area.

<table>
<thead>
<tr>
<th>1.4</th>
<th>The park is aware of an App for a smart phone which is called MySOS. This App was created for users who get into trouble and need assistance. It is free and users of TMNP should be encouraged to take smart phones with them as the App keeps them in touch with help/assistance.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><em>Response:</em> Noted, the Park is investigating the suitability of a number of ‘Safety Apps’.</td>
</tr>
</tbody>
</table>

### 2. C Cozien  E-mail: 18 February 2015

<table>
<thead>
<tr>
<th>2.1</th>
<th>I would like the issue of crime within TMNP, particularly with regard to the safety of My Activity permit holders.</th>
</tr>
</thead>
</table>
|     | Table 2 under section 5.6 of the TMNP draft management plan lists the following as negative aspects of open access areas:  
• No income from users of open access sections, and  
• Crime spills over from city into open access areas  
The first point is only partially correct. I say this because many My Activity permit holders access TMNP at so-called open access points (e.g. Wa Pad, Rhodes Mem, Tokai) but pay to do so through the annual My Activity fee.  
The second point is indeed correct, and something that My Activity permit holders are directly impacted by, in that we have paid an fee to use TMNP recreationally, but are limited in our ability to access the service we have paid for because of lack of security in TMNP.  
I am told that over 1000 My Activity users access Tokai Plantation over any given weekend. Mountain bikers represent a huge percentage of My Activity users and are a valuable source of conservation funding for TMNP.  
The statement in table 10 under section 5.6 that the My Activity card is not widely supported is concerning. Are there a lot of riders found without My Activity permits? If so this should be addressed as matter of urgency. All mountain bikers should hold a valid My Activity permit because their impact on the environment costs SANParks money to manage. |
|     | *Response:*  
See General Response 5.1.1 |

### 3. Tokai District Riding Association  E-mail: 18 February 2015

| 3.1 | On page page 77, *Eucalyptus Lehmannii* is listed in the box. But the new NEMBA AIS regs actually list it as *Eucalyptus Conferruminata*, as "Lehmannii" was apparently mis-applied to some trees in SA and I gather they never were Lehmannii.  
Page 204 of annexures - *E. Lehmannii* issue again. |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><em>Response:</em> Noted and corrected</td>
</tr>
<tr>
<td>3.2</td>
<td>On page 170 of the Annexures, I am not entirely sure what is meant by: &quot;Horse Riding Trails (Varying facilities)&quot; that is listed as not appropriate to TMNP. Does this have a definition somewhere that I missed.</td>
</tr>
<tr>
<td></td>
<td><em>Response:</em> Noted and corrected</td>
</tr>
<tr>
<td>3.3</td>
<td>On page 183 of the annexures, in item 52d, I think that should be &quot;on&quot; not &quot;of&quot;</td>
</tr>
</tbody>
</table>
3.4 | Page 191 of the annexures. Map 3. I fairly sure that the 5th item in the key is meant to read "South African National Biodiversity Institute" no "South African Botanical Institute"

   Response: Noted and corrected

3.5 | Page 195, map 7 + page 196 Map 8 of annexures. I am not convinced that the Tokai Braai Site blue circle is accurately positioned - it looks too close to Orpen Road, versus being correctly placed adjacent to Upper Tokai Road

   Response: Noted and corrected

4. J Houdet | E-mail: 21 February 2015

4.1 | The draft Management Plan is silent on proper monitoring and restoration plans for all threatened species (individual budgets and associate targets)

   Response: The Park Management Plan provides for broad high level objectives, the detailed planning for monitoring and restoration of threatened species and their habitats are written in lower level working plans. The Species of Special Concern Monitoring Programme (See Section 10.2.3) deals with all threatened taxa in the Park, a guideline monitoring documents is available and all threatened species have been listed and prioritised for monitoring and rehabilitation in a paper published in the Koedoe Journal, Rebelo et al. 2011. A Restoration and Rehabilitation Plan (See Section (10.2.5) have been written for the Park with details of habitat rehabilitation and also species re-introductions where necessary. For particular species SANParks follows the National Biodiversity Management Plans for Species, these include the Penguin, Bontebok and Cape Mountain Zebra plans.

4.2 | The draft Management Plan is silent on habitat / vegetation health or condition status – monitoring and evolution over time (to show actual impact of fire and alien species programme)

   Response: This level of detail for monitoring and research on habitat change and post-fire impacts are in lower level plans. The SANParks Cape Research Centre (CRC) has a Research Strategy which looks at habitat change over time and the CRC is working with universities to monitor the long term trends in landscape change and climate impacts. Numerous research and monitoring programs are underway and new ones are being rolled out.

4.3 | The draft Management Plan is silent on details of current ecological heath of biodiversity in each park section and the short, medium and long term targets.

   Response: This links in with the query 4.2 above and is answered in the CRC quarterly reports on the Biodiversity Monitoring Programme for SANParks. There are 9 programmes which are looked at for each National Park (and sections within a park). These are: Alien and Invasive species, Species of Special Concern, Biodiversity Mechanisms (fire, herbivory etc.), Habitat degradation and rehabilitation, Habitat representation and persistence, Climate and Climate Change, Resource Use, Disease and Fresh Water and Estuarine Systems. Within each of these programmes there are monitoring guidelines and priorities for each park as well as targets that have to be met by both SANParks Scientific Services department and Park Management.
### 5. L van Helden  
**E-mail: 06 March 2015**

5.1 As a nature lover and recreational user of TMNP, I have reviewed the draft management plan and am very happy with its scope and the thorough contemplation of all factors related to park management. The park is obviously in good hands and I would like to commend those who worked on this plan.

**Response:** Noted

5.2 Although I realise that there are capacity issues, in the future I would like to see more policing of the park, especially in the marine protected areas. While both hiking and diving in the Simon’s Town and Cape Point areas, I frequently see illegal fishing happening.

**Response:** Currently management of the TMNP MPA is jointly implemented by Marine Coastal Management, City of Cape Town and SANParks. Future management of the MPA is outlined in Section 10.2.7 of the Draft Plan – Marine Management Programme. The Actions in the Safety and Security programme in Section 10.6.7 of the Revised Draft Plan.

5.3 Crime in the park is also an issue for me, as I often walk alone and so am restricted to walking in high-traffic areas during weekends for my own safety. I would appreciate practical measures to increase personal safety in the park, as I'm sure would your officials.

**Response:** See the Actions in the Safety and Security programme in Section 10.6.7 of the Revised Draft Plan.

### 6. A Pollock  
**E-mail: 07 March 2015**

6.1 Proactive alien vegetation control on the slopes of TMNP? We cannot let aliens hold our Peninsula to ransom again!

**Response:** Alien vegetation management in the plan is outlined in 10.2.2 of the Revised Draft Plan.

### 7. Friends of Lion’s Head  
**Letter: 28 March 2015**

7.1 We feel that the management plan is well written and covers all aspects of park management.

**Response:** Noted

7.2 Page 37 Item 5.3 We as Friends of Lion’s Head are involved in helping tourists becoming environmentally conscious of the necessity of keeping Lion’s Head and environs pleasant and sustainable for all.

**Response:** Noted

7.3 Page 53 We note that TMNP is interested in obtaining land to extend the park on Lion’s Head and Signal Hill. Are there any specific land purchases proposed.

**Response:** Section 8.2 of the Revised Draft Plan refers to land consolidation of outstanding public land in the Lion’s Head Signal Hill area.

7.4 Page 56 The development of Signal Hill and Kloof Nek is a priority and we as Friends of Lion’s Head would like to participate in the planning thereof.

**Response:** Noted

7.5 Page 58 Considering the volume of traffic going up Lion’s Head, the path is in need of constant maintenance. A considerable sum will be required to achieve this.

**Response:** The operational plan makes provision for the maintenance of the
path this is scheduled for the 2015/16 year.

<table>
<thead>
<tr>
<th>7.6</th>
<th>Page 59</th>
<th>Item 9.1.9 Alien clearing. Extensive alien clearing is done on a rotation basis on Lion’s Head. However there is significant regrowth and more frequent attention is required.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><em>Response:</em> Alien clearing is scheduled for Lion’s Head in the 2015/16 year with frequent follow ups planned.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7.7</th>
<th>Item 9.2.1 One of the key improvements at Lion’s Head is to provide adequate toilets at the parking area at the entrance to the jeep track. At present there are signs directing tourists to the TMNP offices about 500 metres away. This is not satisfactory for the start of the walk up Lion’s Head. The surrounding bush is covered in faeces.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><em>Response:</em> Toilet facilities at Lion’s Head will be addressed through the planning for the Signal Hill summit and environs. Temporary toilets are in place during the festive season and a Park team has been established to clean surrounding bushes.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7.8</th>
<th>Page 62</th>
<th>Item 9.4 As mentioned above, better sewage disposal at the entrance to the jeep track is required.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><em>Response:</em> See response 7.7</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7.9</th>
<th>Page 70</th>
<th>Item 10.2 Regular block burning of the area is necessary for the propagation of fynbos and to avoid extensive fires such as that in March 2015. The request of ignorant local residents to avoid prescribed burns must be overridden. We agree with the sentiments set out on page 72.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><em>Response:</em> Noted</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7.10</th>
<th>Page 79</th>
<th>Management of alien vegetation. We agree with a 2 year cycle of alien removal. At present the cycle of removal on Lion’s Head is considerably longer than 2 years.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><em>Response:</em> The removal of alien clearing is still the 2 year cycle and has not changed. Care is taken where removing vegetation can lead to erosion.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7.11</th>
<th>Page 83</th>
<th>We agree that special attention should be given to the renosterveld on Signal Hill.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><em>Response:</em> Noted</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7.12</th>
<th>Page 90</th>
<th>Security. As stated one of the potential risks to tourism is crime on the mountain. A few years ago rangers with dogs were a common sight. We have not seen any recently. In view of recent attacks the dog patrols should be reintroduced on the popular tourist routes.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><em>Response:</em> Dog Patrols are frequently undertaken in the Lion’s Head area and the teams undertook training to increase their patrols. See the Actions in the Safety and Security programme in Section 10.6.7 of the Revised Draft Plan.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7.13</th>
<th>Page 92</th>
<th>We can assist in providing and coordinating customer feedback.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><em>Response:</em> Noted, the offer is appreciated and will be followed up.</td>
<td></td>
</tr>
</tbody>
</table>

<p>| 7.14 | Page 101 | More innovative ways of financing maintenance on Lions Head are |</p>
<table>
<thead>
<tr>
<th>Page</th>
<th>Comments</th>
</tr>
</thead>
</table>
| 7.15 | Page 106: As stated previously, increased maintenance of the paths on Lion’s Head is required.  
**Response:** The operational plan makes provision for the maintenance of the path this is scheduled for the 2015/16 year. |
| 7.16 | In the mission statement, one of the main objectives is preservation of fynbos. After the pines were harvested at Constantia Nek, the fynbos emerged from seed and seemed vibrant. Now however, there is significant regrowth of pine trees. What is the long term plan for that area?  
**Response:** The area will be managed as per the Tokai and Cecilia Management Framework (as revised). |

8. Sue Smith  
**Email:** 30 March 2015

| 8.1 | Page 24: Organogram refers – why is visitor safety, which applies across the park, located under the area north? In other words, as VS operates across the park why is it not indicated as a separate unit reporting directly to the park manager?  
**Response:** This anomaly is intentional and the result of the greater need in the Northern Section of the Park for a dedicated Visitor Safety team; due to the proximity of the city and 24 hour openly accessible nature in this area. In the Central and Southern section’s visitor safety is integrated into other ranger functions. |

9. P van Helden  
**Email:** 15 April 2015

| 9.1 | My comments do not include any proof reading, eg typos, spelling, grammar or otherwise and follow the document in its arrangement, ie by page or topic. These comments, if TMNP wishes to take note of them, should then take translation in later sections of the document, for implementation.  
**Response:** Corrections will be done. |
| 9.2 | P18: TMNP has 4 charged access points. In my opinion, this number should be increased. TMNP/SANParks cannot survive without increased income. I am aware that this may occasion public complaints, but after closure of Silvermine, it is perhaps a good time to reopen S East at full cost, same as S West. Also consider Tokai or others.  
Park Entry Points, including pay points are dealt with in Section 4.1.4 of Annexure 3 (Park Zoning and CDF). The introduction of any new pay points will be subject to the relevant approval procedures. |
| 9.3 | P19: Section 2.12.11: I am far from convinced that one should state it so clearly that the Park needs to facilitate access of poorer communities. This implies excluding others at least by omission. It is from the wealthier communities that conservationists or at least philanthropists are historically (global experience) quite likely to emerge. These youngsters need as much exposure if not more. It is assumed that they can visit with families: this is rarely the case in my experience.  
**Response:** Noted |
| 9.4 | I also think that economic benefit does not flow to the poorer communities only by... |
direct engagement but also to the poorer communities indirectly by virtue of
tourism opportunities and the indirect impact that has on employment. I think this
should be clearly stated.

Response: Agreed. The Responsible Tourism Programme addresses this
concern. See Section 10.4 of the Revised Draft Plan.

9.5 The park works with “youth at risk”. This is laudable. However, it has been shown
very clearly that enhanced opportunities for the gifted pays outstanding dividends
over the long term. I think this is a vital opportunity that is missed in SANParks
overall and in this instance in TMNP.

Response: Noted

9.6 P30 section 5.4: change “beliefs” to “Values”? I also think that the document is
rather vague in most places. Of course it will become impossibly long and limiting
if too much detail is given and lock SANParks to given limiting statements. But an
example is the 5th bullet point here, which talks about ecosystem goods and
services. I think it would be very useful if this was defined with some examples.

Response: These are high level ‘operating values’ set by SANParks at
corporate level as a guide to operations in all National Parks.

9.7 P31 table 1, section 1 under “negative”: add “introduction of aliens from
neighbours”


9.8 Section 3: under negative: Poaching and exploitation in take zones implies this is
not a true MPA. The MPA is not effective owing to its small size and
fragmentation.

Response: The TMNP MPA comprises a consolidated 1000km² ‘controlled
zone’ and 6 ‘restricted / no-take zones’ to address these challenge. (see Map
3 in the Revised Draft plan)

9.9 P32 section 5: Under negative: Development pressure could cut off connections
between sections of TMNP, eg north/south


9.10 P46 section 7.1: In my opinion, there is a need for more pay access points and to
get Silvermine East and West on a par.

Response: Response: Noted. Park Entry Points, including pay points are dealt
with in Section 4.1.4 of Annexure 3 (Park Zoning and CDF).

9.11 Section 7.2: the restricted areas noted should match those mentioned in 6.2.6

Response: Checked, areas do correspond.

9.12 P49 section7.9: I would be very wary of this paragraph. One could read it that it is
TMNP intent to formalise community use of the park, which I think would be a
disaster.

Response: Noted, see Section 10.2.4 for the actions around formalising
community use of natural resources in the Park.

9.13 P54 section 8.4: in my opinion, the fragmented MPA is a disaster. We need a
continuum, even it is just the Cape Point part. Of course that will result in a drop in
gate and permit income, but in the long term it will benefit "surrounding
communities" in terms of improved fishing take next to the zone. (see also p 57
section 9.1.3).

Response: The TMNP MPA comprises a consolidated 1000km² 'controlled
zone' and 6 'restricted / no-take zones' to address these challenge. (see Map
3 in the draft plan)

9.14 TMNP has problems with some aspects of the City and province and private
individuals who would rather sell for profit and realise "development

Response: Noted

9.15 I object most strongly to any suggestion that TMNP could be used by any religious
group for any ceremonies, such as baptism, cleansing rituals or worship. None of
this was traditionally done in TMNP as far as I am concerned. (Of course, it
depends on how far back one wishes to go to define tradition). Should TMNP
decide to allow this, then it must be permit driven at high cost. One can already
see the environmental degradation in many places from such activities. It also
opens the path for collection of natural products (theft in reality).

Response: Noted, see Section 10.3, Cultural heritage management, sub-
objective Intangible Heritage outlines the actions related to the spiritual
significance of the Park to people.

9.16 Likewise, I object most strongly to any notions of a sport facility, motor cycle trails,
a luxury boutique hotel (the city is full of them) or clay pigeon shooting. The later
activity has been shown to cause serious lead pollution problems (from pellets) in
water creatures, quite apart from any other effects. I am aware that sometimes
one may use pellets that are not lead, but this does not negate my comments in
their entirety. Perhaps this may be acceptable in the quarry, but nowhere else.
Likewise, I totally oppose any ideas of a health spa, a gym or Wellness centre.
Similarly, paint ball, a Laundromat (unless directly at the Wash house) or a sports
bar. These things have no place in a natural area and if allowed in, will simply lead
to creep towards more urban activities unsuitable for a natural area.

Response: Useful comments on the potential activities listed in the Product
Development Framework guidelines are noted. For example only
motorcycling on tar roads in the Park, as currently permitted, is viewed as
appropriate. Clay pigeon shooting would only be applicable in the quarries
where currently shooting ranges operate. Likewise for paintball. A health spa,
gym or wellness centre may be considered in suitably designated visitor sites
in the high intensity leisure zones. These would all be subject to more detailed
local planning and required approvals.

9.17 Annexure p143 para 1.3.4: the remote core zone: no publicised activities such as
an adventure race should ever be allowed. This is not allowed in the wilderness
zones of eKZN parks, which I think is the correct decision. This zone should be
used for hiking, birdwatching and only nature activities of this type. Adventure
racing causes environmental degradation (and pollution sometimes), even if only
erosion from high impact path travel.

Response: Noted. The possibility of trail running events, with limited
participant numbers, under strict permit conditions may be considered -
‘adventure race’ has been corrected to ‘trail running’ in the Revised Draft Plan.

10. Western Province Athletics (WPA) Letter: 29 April 2015

10.1 Page 20: Socio Economic context:
The Two Oceans Marathon is organised by a non-profit company under the auspices of Athletics South Africa and Western Province Athletics. Other events under the auspices of WPA that take place partially or wholly in TMNP are:

- **16km** Table Mountain Race organised by Varsity Old Boys Club: From Constantia Nek, up the service road, round the dams and back down. Approx 200 persons. Has taken place for more than 30 years. Organised as a charity event on behalf of SANParks.

- **15km** Manor House Run organised by Southern Striders Athletic Club. Starts and Finishes at Porter School. Has been organised for more than 20 years. 1000 participants. Race profits donated to charity.

- **15km** Tokai Forest Run organised by Foresters Athletic Club. Starts and Finishes at Tokai picnic area. Has been organised for more than 20 years. Organised as a charity event for Victoria Hospital Children’s ward. In 2014 this event was not held due to the levy imposed by SANParks. The hospital was therefore denied its annual donation of approx R50 000.

- **80km** Puffer Ultra run organised by Fish Hoek Athletic Club. Starts at Cape Point and finishes at the Waterfront. 200 participants. Has been organised for about 20 years.

- **21km** Landmarks Race organised by WP Cricket Club Athletics section. Occurs mainly in the roads of Rondebosch / Mowbray but utilises the tar road up to Rhodes Memorial which falls within the TMNP managed property. Approx 2000 participants. Has been organised for about 20 years. Annually donates hundreds of soft toys to the Red Cross Children’s War Memorial Hospital through its “Run with a Teddy” appeal.

Although the Trail Association of WP is affiliated to WPA, none of the trail events held in the park fall directly under WPA.

### Response

All events which happen in the Park are as a result of a direct approach by an event organiser to secure a date and route within the Park. No link or affiliation to a sporting body is required.

### 10.2

Several clubs affiliated to WPA arrange occasional social runs in or through sections of the park such as Cecilia Forest. These are informal and are relatively small, have no entry fee, and no arranged infrastructure. The main emphasis is safety in numbers from a crime and injury perspective.

### Response

Noted

### 10.3

In order to bring order to the sport, WPA would like TMNP to work through sport federations when approving events related to that sport. At present there is a free-for-all attitude amongst event organisers which makes it impossible to plan competition calendars, implement standards, coordinate a funding model for the sport and maintain discipline.

As things stand now anyone may approach TMNP/City to stage a running event. This results in unmanaged competition for dates and routes. If WP Athletics (or its affiliate TrailWP) could be recognised as the gate-keeper for applications for running events it would improve matters significantly.

### Response

Events in the Park are not in competition to the WPA event calendar. Many of these events are purely social in nature and should not be
viewed as competition for the WPA Association as they are not road events. These events are not qualifying events either and hence do not impact WPA. Furthermore, the Park event calendar operates on a first come first serve basis and is not limited to trail running but encompasses all types of events and hence can’t give trail running preferential date allocations.

**10.4 Page 97 Charity Donations**

Currently events that raise funds for conservation route those donations to the Honorary Rangers because in that way the funds can be utilised in the local park. Our understanding is that any donations to SANParks are sent to the national coffers. We believe that the TMNP management plan should reflect that charity donations derived from events in TMNP will be retained for use in TMNP. If that means diverting all charity donations to Honorary Rangers then that should be local park policy. The users want OUR money to be spent on OUR park!!

**Response:** All events are billed an event fee for holding an event in the Park. Should an event organiser choose to make a donation to the Park over and above the event fee such donation is noted in terms of the Public Finance Management Act. Should an event organiser wish to make a donation to the SANParks Honorary Rangers, such donation will be managed in terms of their policy and procedures.

**10.5 Section 11: Costing:** provides reasonable detail on the Expenditure Budget but provides no breakdown of how Income is to be derived. We appeal for the single line in the Income Budget to be expanded to give greater transparency to the source of income and the expected growth – both in terms of numbers of visitors/users as well as tariffs. In 11.2 it is implied that TMNP income will be milked to subsidise the national operating budget.

**Response:** Table 11 (Revised Draft Plan) in Section 11.2 has been updated to show the high level income streams.

**10.6**

In light of the above it is therefore alarming that the Net Income surplus is budgeted to increase from R1.4 to R63.6 million over 5 years without any indication of how that margin is to be generated. From what we have experienced in the last two years it appears that the local residents and recreational users of the park will be faced with ever escalating usage fees to meet this budget. We object to this most strongly and demand that increased income be as a result of visitor growth rather than increasing the burden on the existing (local) users and recreational events.

**Response:** Table 11 (Revised Draft Plan) in Section 11.2 has been updated to show the high level income streams.

**10.7**

Currently the participant fee for events is R60. If the stated 10% inflation rate is used then the per user fee will rise to R97 in 5 years! In addition to user fees, SANParks is also coming up with multiple other fees on organisers such as EMP monitors, vehicle access fees, gate fees, security fees, etc etc etc. This is going to result in access to events in TMNP being out of reach of a large percentage of the community. Sport in the park will become elitist. Events in TMNP provide participants with the opportunity to experience nature in a safe and organised manner, which they would probably never do by themselves.

**Response:** Access to open areas of the Park to walk, hike and trail run for recreational purposes, remains free of charge and this is the case 365 days of the year. However the legislation that governs the SANParks requires any organised / commercial event to be permitted with the payment of appropriate fees.
| 10.8 | The recently updated City of Cape Town sport and recreation policy specifically targets community participation in events, but the TMNP pricing policy is working in direct opposition to this aim. Government in all three spheres spends millions of Rands each year encouraging people (particularly young people) to exercise regularly to remain healthy (and out of trouble) so it is counter-productive and wasteful for one part of government to make running races so expensive that people can’t afford to participate and so negate the efforts of other parts of government;  

*Response:* Access to open areas of the Park to walk, hike and trail run remain free of charge for recreational purposes 365 days of the year. The Park encourages all people to access the park for this purpose. Participation in events is something completely different and is charged for. WPA has a maximum fee it allows its affiliated clubs to charge for events. Sponsors are used by most event organisers who operate within the park to cross subsidise short falls. |

| 10.9 | TMNP will from time to time need the support of the public to prevent the encroachment of developments impacting negatively on the TMNP. Nothing makes people more enthusiastic defenders of the integrity of the TMNP than having experienced and appreciated the joy of being in the Park.  

*Response:* Agreed |

| 10.10 | If the charges to stage an event continue to increase at their current rate, it will see running events in the park disappearing as they will not be viable. We have already seen the popular Foresters Tokai Forest run cancelled in 2014 for this reason. Others could well follow. So instead of reasonable income, SANParks will get NOTHING from running events.  

*Response:* Noted |

| 11. Trail Running Association of the Western Province (TrailWP) Letter: 29 April 2015 |

| 11.1 | Page 33. Attribute 10: The trail running community relates strongly to attribute 10 as recreational users. There are several groups of runners that meet regularly (weekdays and weekends) on a social basis to run on the mountain trails. This is mainly for safety in numbers both as regards crime as well as risk of injury.  

*Response:* Noted |

| 11.2 | Page 58 9.1.7 Movement network upgrade: The organisers of trail running events that take place in the park are prepared to cooperate with TMNP to assist with maintenance of paths – particularly those utilised by a particular event.  

*Response:* Noted |

| 11.3 | Page 63 9.2.4 Greater Newlands A new trail run organised by Two Oceans Marathon Association in conjunction with Energy Events is to utilise the old zoo venue. We believe this venue has great potential as a hub for both trail and mountain biking and would be interested in interacting with TMNP on this project.  

*Response:* Noted |
11.4 Page 89  10.4 Responsible Tourism Management
We would request that this programme be split into two distinct groups: Tourism and Recreation.
We believe that the needs of these groups are significantly different. Tourism reflects a visitor to the region while the recreational user is normally a local resident. We believe that the programme should recognise this. Several of the programmes in Section 10 refer to Tourism and Recreation as separate user groups.

Response: See General Response 5.1.2

11.5 Page 91 Revenue Growth: We urge TMNP to differentiate clearly between the different user groups when driving revenue growth. Film makers and other commercial operators should be charged very different rates to recreational users and organisations that stage recreational events for community or charity benefit. This statement is applicable to several sections where tariffs are mentioned.

Response: The fact that an event is raising money for charity is noteworthy. Access to open areas of the Park to walk, hike and trail run for recreational purposes, remains free of charge and this is the case 365 days of the year. However the legislation that governs the SANParks requires any organised / commercial event to be permitted with the payment of appropriate fees.

11.6 The trail running community would support an Activity card structure if the loyalty shown in taking out such a card was reflected in user benefits such as reduced charges for staging organised trail running events.

Response: Activity Permits are required to permit high impact recreational activities undertaken by individuals in the Park. Activity Permit cannot be used as substitute for participating in events in the Park. Access to open areas of the Park to walk, hike and trail run for recreational purposes, remains free of charge and this is the case 365 days of the year. However the legislation that governs the SANParks requires any organised / commercial event to be permitted with the payment of appropriate fees.

11.7 Page 96  10.5 Constituency Building
In order to bring order to the sport, TrailWP would like TMNP to work through sport federations when approving events related to that sport. At present there is a free-for-all attitude amongst event organisers which makes it impossible to plan competition calendars, implement standards, coordinate a funding model for the sport and maintain discipline.
As things stand now anyone may approach TMNP/City to stage a running event. This results in unmanaged competition for dates and routes. If TrailWP (or WP Athletics to which we are affiliated) could be recognised as the gate-keeper for applications for running events it would improve matters significantly.

Response: Events in the Park are not run in competition to the WPA event calendar. Many of these events are purely social in nature and should not be viewed as competition for the WPA association as they are not road events. These events are not qualifying events either and hence do not impact WPA. Furthermore, the Park event calendar operates on a first come first serve basis and is not limited to trail running but encompasses all nature of events and hence can’t give trail running preferential date allocations.

11.8 The trail running community is quite close knit and is generally self-regulating. By
far the majority of trail running is conducted on a social / recreational basis (as opposed to organised events) so we would appeal to the management plan to recognise the social trail running groups as key stakeholders.

*Response*: The Park encourages all recreational user groups to mobilise themselves into recognised representative groups and to interact with the park and share recommendations and opinions in a constructive manner.

**11.9 Page 97 Charity Donations**

Currently events that raise funds for conservation route those donations to the Honorary Rangers because in that way the funds can be utilised in the local park. Our understanding is that any donations to SANParks are sent to the national coffers. We believe that the TMNP management plan should reflect that charity donations derived from events in TMNP will be retained for use in TMNP. If that means diverting all charity donations to Honorary Rangers then that should be local park policy. We want OUR money to be spent on OUR park!!

*Response*: Donations to the Park are noted in terms of the Public Finance Management Act. Should an event organiser wish to make a donation to the SANParks Honorary Rangers, such donation will be managed in terms of their policy and procedures.

**12. Friends of the Dog Walkers Email: 04 May 2015**

**12.1 Section 5.6 item 10.**

Please specify exactly the legislative requirement for imposing recreational permits into s 24 NEMA. Which of the NEMA acts? Which activities exactly have been identified by the minister as requiring authorisation from the competent authority and does this include walking with a dog? Which is the competent authority, in this case is it TMNP?

*Response*: Recreational permits (Activity Permits) do not fall under section 24 of NEMA which lists activities that may have a negative impact on the environment are listed and commencement of those activities cannot being unless a formal Environmental Authorisation is obtained.

Activity permits fall under the “Regulations For The Proper Administration of Special Nature Reserves, National Parks And World Heritage Sites” which are done in terms of Section 86 of the NEA: Protected Areas Act.

Activities listed are outlined in Sections 30, 35, 49 of the Regulations.

SANParks in the Management Authority of the Table Mountain National Park.

**12.2 The use of recreational permits is not widely supported and limited understanding of concept and administration not user friendly**

*Response*: See General Response 5.1.1

**12.3 The signage at certain entry points advising of requirement for permits, does not specify where or how to get permits, eg locality of purchase points, requirement to bring photos etc. Not sufficient to put small note on the board with park website. Not everyone has access to internet.**

*Response*: Information on Park signage is constantly being updated as signs are replaced. Additional information is available from Park field offices and
| **12.4** | These permits have been justified as a management tool. In practice the objectives of park funding and management have become separated. The original intention to hand a leaflet with pertinent information re dog walking with the permit has been abandoned. It is not reasonable to expect new permit holders to search on your website for further information.  
*Response:* The information / pamphlet is available from Park Field Offices and can be e-mailed to the permit holder when purchasing the Activity Permit. |
| **12.5** | Management of dogs and their handlers. The EMP for walking with dogs as agreed between TMNP and FDW includes a number of provisions that have been abandoned and ignored by TMNP’s dog group. eg, No minutes taken by Park members at stakeholder meetings (FDW take our own minutes), such meetings are no longer scheduled and much of the EMP has been abandoned by TMNP except in so far as it suits local area managers.  
*Response:* The Walkers Accompanied by Dogs EMP is still valid and operational. The required meetings need to be held. |
| **12.6** | Section 9 concept Development Plan  
No mention of Tokai Arboretum. FDW have asked repeatedly but in vain for dogs to be allowed in the Arboretum. When the Tokai area management plan was put out for public comment FDW asked for its inclusion in dog walking areas and there was not one objection from any other park users but although the Arboretum was included in the Dog EMP as a possible location for dog walking dogs were still excluded.  
*Response:* Areas available for various EMP activities are reviewed as part of the EMP for that activity. For the Tokai Arboretum, the Tokai and Cecilia Management Framework is an additional informant to dog walking areas in the Tokai area. |
| **12.7** | 9.2.6. Silvermine dam access for dogs to swim. The limited area allowing dogs to drink and cool down on the southern side of the dam is much too small and having to share it with visitors without dogs leads to conflict. An increased picnic area should not prevent enlarging the dog area.  
*Response:* A detailed site layout will be considered as and when the picnic area is established. |
| **12.8** | Information Management Programs  
10.6.5 Database of Park information make all information available to public on your website as soon as possible. Particularly your financial reports. Also minutes of all stakeholder meetings.  
*Response:* SANParks has developed a Manual in terms of the Promotion of Access to Information Act (PAIA) which is available to the general public on its website and the public is encouraged to make use of PAIA mechanism to access information. |

**13. Zandvlei Trust**  
**Email:** 06 May 2015

| **13.1** | Item 2.12.4 Fresh Water Ecosystems:  
There is no mention of the Sand River Catchment system, at all, it flows through the Constantia Valley and part of the Cape Flats into the Zandvlei estuary. All the catchment streams and rivers originate in the TMNP flowing into the Sand River Catchment and therefore TMNP is a key role player. The Diep River has its source above Kirstenbosch and flows to Zandvlei 15 kms away as an example. |
The Sand River Catchment Forum has been operating since 1998 (with all the key role players represented) and meeting in the TMNP Research Centre offices in Tokai for the past couple of years. It has representatives from TMNP attending the meetings. See the website for the participants minutes and more information.

*Response:* Noted. There are a number of freshwater ecosystems in TMNP and the plan addresses these in a holistic manner although specific mention is made of Source to Sea. Addressed in Section 10.2.6 in the Draft Plan.

<table>
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<tr>
<th>13.2</th>
<th>Zandvlei Nature Reserve is a recognised City of Cape Town, Estuary Nature Reserve with a Management Plan. The estuary management plan was developed under the Zandvlei Estuary Management Forum (ZEMF) for the CAPE Estuaries Programme. A Zandvlei Protected Areas Advisory Committee has been appointed to succeed the ZEMF and is about to start its work. Just examples to indicate there is and has been a good continuous working relationship and co-operation between local authority and civil society organisations in this area of concern. Zandvlei is the remaining viable estuary on the False Bay coastline.</th>
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<tr>
<td>13.3</td>
<td>Section 5. Purpose and Vision. &amp; Section 10. Strategic Plan Why is there no reference to developing biodiversity links / corridors across the Cape Flats to the Koegelberg Biosphere and other mountain areas to the north east of TMNP? Here I am referring to the bigger picture, beyond the TMNP boundaries. After all it is a declared World Heritage Site. Could TMNP become an isolated entity if the biodiversity corridors are cut off by suburban development without sufficient natural area corridors (stepping stone reserves) to link to these mountain areas for genetic diversification and movement for all fauna and flora. There are depts within the City of Cape Town working very hard to develop, maintain and expand these corridors for all biodiversity needs.</td>
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<td>14.</td>
<td>The Mountain Club of South Africa - Cape Town Section Letter: 08 May 2015</td>
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### Response: Noted

**14.2** Page 33, Section 5.6, Park Key Attributes
We trust that the MCSA is one of the ‘recognised recreational user groups’ referred to in Item 10, as well as one of the ‘Specialist groups which contribute to managing the Park’ in Item 12.

*Response:* Noted, the ‘user groups’ refers to the type of recreational activity undertaken in the Park e.g. mountain biking, climbing, etc.

**14.3** We note that Item 10 also recognises the difficulties and significant inefficiencies inherent in the Activity card system. We suggest that TMNP should re-think the concept and only apply it where it can be successfully and cost-effectively administered, such as for filming and commercial activities rather than for the local masses who have freely used the TMNP area for recreational purposes for very many years.

*Response:* See General Response 5.1.1

**14.4** Page 37, Section 5.7, Item 5.1, Stakeholder Management Objective
Our experience is that communication with the Park has often been problematic, and that the facilitation of ‘mutually beneficial dialogues with stakeholders’ requires serious attention. We believe that progress with the ‘stakeholder engagement mechanisms’ referred to on page 95 under Section 10.5 Constituency-building will be beneficial all round.

*Response:* See General Response 5.1.4

**14.5** Page 107, Section 10.6.7, Safety and security programme
We suggest that there should be more emphasis on surveillance, foot patrols and related measures to pre-empt and reduce the opportunity for criminal activity, rather than on managing negative media reports on crime.

*Response:* Noted, this suggestion can be carried through to the Action for updating and reviewing the Safety and Security Plan for the Park in Section 10.6.7.

**14.6** Page 136, Annexure 3, Park Zoning
We are particularly concerned with the proposed Park Zoning in relation to rock-climbing activities and comment as follows:

On page 164, Table 17b is a list of Park Recreational Activities with a footnote reading ‘The highlighted activities are/will be subject to EMPs compiled in consultation with the relevant organised user groups’.

The list distinguishes between various modes of rock-climbing, namely:

**Sport Climbing** (climbing on specific bolted crags in areas zoned for the purpose)
- We attach a copy of the for which an EMP was settled in 2000, in terms of which the MCSA has continued to manage sport climbing on TMNP’s behalf ever since. An Activity permit is required but when Activity Permits were introduced it was agreed that, in view of the work done by the MCSA, card-carrying members of MCSA would be exempt from this requirement.

**Bouldering** - MCSA has been working with TMNP on a draft EMP since 2012. No Activity permit is required.
Traditional and Free Climbing - As recorded in para 1.3 of the EMP, after consultation in 1997 it was agreed that traditional and free climbing would not be included in the EMP as they have no more environmental impact than walking, while all climbers should of course be committed to the environmental concerns inherent in the EMP. No Activity permit is required.

Activity permits were introduced under the 2005 Regulations for National Parks promulgated under the NEM:PAA, Regulation 30(a) of which provides that written permission is required to engage in ‘the sport of climbing rock faces’. It was accepted that this referred only to sport climbing.

In 2013 TMNP made a unilateral attempt to require Activity permits for traditional climbing. MCSA engaged with TMNP, the attempt was withdrawn and we received assurances that there would be proper consultation with us on the matter. We engaged with the TMNP in April 2013 asking six specific questions to which we requested answers before we engage in the required consultation process. To date we have had no reply to this letter.

Response: See General Response 5.1.1

14.7 We are accordingly concerned to see that on page 182, Annexure 5, Internal Park Rules, para 49, Special Use Permits it is proposed that an Activity permit be required for ‘climbing on, hanging from or abseiling down rock faces’. This is far wider than the present position or indeed than the NEM:PAA Regulations, and requires proper consultation before it goes any further.

Response: Noted, The Internal Park Rules are currently in draft form.

14.8 Page 175, Table 18b, Products and Services
We record that at a public information meeting one of our members asked why ‘Wilderness Search and Rescue’ was not ticked as appropriate in Remote Core zones. Assurance was given that while Search and Rescue teams would not generally be permitted to conduct training or practice sessions in Remote Core zones, they can of course carry out actual rescues there.

Response: Agreed.

14.9 We also record that, on another query in the light of certain rumours, assurance was given that it is not intended to restrict traditional climbing on the crags below the Upper Cable Station.

Response: Issues between Park concessions and recreational users need to be managed to mitigate use and safety issues.


15.1 I was surprised by the complexity of the challenges involved in managing TMNP and I was impressed with the commitment and dedication of the TMNP Management present at the Information Session. The Draft Park Management Plan is an extremely detailed and well thought out document. Clearly a lot of effort has gone into its compilation.

Response: Noted

15.2 However it is clear that it (the plan) has been based on a format that is applicable
to a “typical rural” National Park. And as such it is lacking in some aspects:

- TMNP is differs from other South African National Parks in that it is surrounded by a City.
- The Park neighbours are not a few hundred rural farmers. Rather there are the over 3.5 million inhabitants of the City.
- The inhabitants literally work and live in the shadow of Table Mountain. The mountain, and hence TMNP is a feature in the day to day life of all of those citizens.
- While most are happy to view the mountain from below, a few chose to walk on it on occasions. Noting the very large number of people living close to the mountain, if only a small fraction of those people visit the mountain, this will result in a large number of visitors.

This Management Plan must take note of this and specific provisions must be made to cater for the inhabitants of Cape Town. If this is not done, there is the risk of the Park literally being overrun by local residents in an uncontrolled manner.

Response: The format of the Park Management Plan is prescribed by the Department of Environmental Affairs. The challenges and risks of non-gated access areas and the urban edge are detailed throughout the Revised Draft Plan.

15.3 We were informed during the presentation that about 10 000 Annual Activity Permits are currently in issue. Many of the permit holders are regular visitors, like myself, who enter the park weekly or more regularly. There are obviously more visitors who purchase day permits as well as those visitors who participate in “activities” but neglect to purchase a permit. This represents a very large number of “Activity” visits. Activity visitors are usually local residents who have a close association with the Park. Many others are guests of local residents who visit to share the experience of the mountain. Thus Activity visitors represent a large, enthusiastic, knowledgeable, non-seasonal group of repeat visitors.

In the proposed management plan, “activities” are covered by the “responsible tourism” management program. This also includes the management conventional tourists. Many of those visitors are not from Cape Town, only visit the Park once, have limited time to spend in the Park. These tourists represent a very different customer group and have very different requirements and aspirations to local Activity Visitors.

Thus I suggest that a separate “Sustainable Activity Management Program” should be incorporated into the Management Plan, in parallel with the “Responsible Tourism Management Program”. This would allow the better focus on the management of Activities in the Park for the benefit of the Park itself, more efficient Park management and better control of potential ecological impact.

Response: See General Response 5.1.1 & 5.1.2. Responsible Tourism is an internationally recognised set of principles with SANParks has adopted and it engages all aspects of a business. See Section 10.4.

15.4 In particular, while a very large number of Activity visits are undertaken, there are over 3.5 million residents in Cape Town. If just 5% of these become regular “Activity visitors” and visit the Park on average, 10 times a year each this represents 1.75 million visits per year. The Park has “open boundaries” and the common perception amongst many Capetonians is that they are entitled to walk into the Park, together with their dog or fishing rod etc. and they are not aware of the requirement to have a permit, nor appreciative of why this might be
requirement. I suggest that the “Sustainable Activity Management Program” is required to educate visitors, promote the Park and most importantly ensure that visitors have an understanding of the sensitivity of the ecology of the park. Through this, the ecologically of the Park can be protected from the potential threat of damage from 3.5 million close neighbours.

Response: The Park has an Environmental education programme which is targeted at the youth and is successfully bringing over 30,000 into the Park annually. This programme does get extended to adults patrons when the opportunity arises. It is agreed that education is the key to the sustainable preservation the Park for future generations.

15.5 I suggest the following points as objectives for this Management Program:
1 Communication Program for Activity Permit Holders:
   - Recording the Activity interests of all permit holders when permits are issued.
   - Maintaining a database of e-mail addresses, grouped by Activity interests etc. This must be done in a responsible manner with regards to future “POPI” legislation.
   - Regular communications, eg monthly news-letters, focused on card holders specific interests.
   - “Just in time” communications and announcements in response to circumstances and events in the Park.
   - Signposting is a sensitive issue within the Park. However the current practice is often too little sign posting and too late.
   - Signposting should be augmented with information distributed on regularly updated web sites and posted at entry points and distributed at permit sales points.
   - This information should be Activity specific and kept up to date.

Response: See General Response 5.1.1 & 5.1.4. The Park has a database of all Activity Permit holders and it is already kept in line with POPI legislation.

15.6 2 User friendly permit sales:
   - Annual permits should be sold at more locations and during wider office hours. On-line renewal of annual permits should be implemented, if not the complete sale of new annual permits.
   - Day permits sold at more locations. Such as service providers at Rhodes Memorial, The Cable Car, Tokai Tea Room etc.
   - Day permits should also be sold via 3rd parties such as cycle shops and Activity tour operators

Response: See General Response 5.1.1

15.7 3. Sensible pricing of Activity Permits.:
In the past we have seen the prices of some Activity fees increased by up to 50% with no warning. This has raised huge resentment from the effected parties and I suspect a significant increase in the number of persons engaging activities without paying.

If permits are priced in a responsible manner with user acceptance, a far higher number of permits will be sold. This will result in higher revenue and an inclusive
permit holder base. On the contrary, if the past pricing practices are repeated, it may lead to an attitude of civil disobedience, in a similar manner to what has happened with the Gauteng E-Tolls.

The Park has “open borders” and would be very vulnerable in such a situation. The loss of revenue would be overshadowed by the potential ecological damage.

Consideration should be given to:
- The effects of Activity pricing on specific users. No Capetonian should be excluded from any Activity within TMNP due to their inability to afford the required permit.
- Provision should be made for discounts for scholars, students, families and groups from previously disadvantaged areas to enjoy the activities on the mountain.

Specifically I suggest:
- **i)** Activities for children under the age of 12, accompanied by a paying parent, should be free of charge.
- **ii)** Activities for children between 12 and 18 years, as well as full time registered students, should be half price.
- **iii)** Family tariffs should allow spouses and dependent children to participate in activities for half price.
- **iv)** Provision should be made for educational groups and underprivileged, development groups to participated in activities at reduced rates.
  - Price increases should be kept in line with inflation and communicated to permit holders ahead of time.
  - Details of pricing should be communicated to Activity users together with motivation for the prices charged.
  - The costs of participating in an Activity within TMNP should not be significantly higher than the cost of participating in a similar Activity in another area, like a Cape Nature reserve or on privately owned land.

*Response:* See General Response 5.1.1

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<tr>
<th>15.8</th>
<th>4 Co-operation with representative groups:</th>
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<tr>
<td></td>
<td>- The Park should keep a register of representative user groups. Together with contact details, like web sites, records of their affiliations, constitutions etc.</td>
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<td>- The Park should actively communicate with such groups representing and organising various activities.</td>
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<td>- Purchasers of permits should be informed about groups who represent their specific activities.</td>
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<td>- Representative groups should be encouraged to educate their user bases with regards to the sensitivities of the ecology of the Park.</td>
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*Response:* See General Response 5.1.2

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<th>15.9</th>
<th>5 Management of the Interaction between Activity User Groups:</th>
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<td>- The Park should provide a platform for the communication between user groups.</td>
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<td>- On occasions the park management may have to arbitrate between user groups when conflicts arise.</td>
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*Response:* Noted and see General Response 5.1.2

| 15.10| 6 Activity groups should be encouraged, and enabled, to police their own members: |
– By their nature activities take place over a wide area of the Park, at different times of the day.
– It is beyond the scope of the Park personnel to “police” all of the Activity visits that occur in the Park.
– User groups should be encouraged to educate their own members.
– A system of “volunteer marshals” could be considered to enable Activity members to control their peers.

Response: The EMP’s makes provision for the activity user groups to self-regulate their activities.

15.11 7 Co-operation with 3rd party organisations with regards to the development of facilities for activities. There are many interest groups who would be prepared to fund projects in the Park to facilitate activities. For example, for the construction of cycling paths or combined hiking/cycling/horse riding trails. But funds for these projects can only be released with the co-operation, planning and permission from the Park.

Response: Sponsorships and donations are addressed as per the Public Management Finance Act. Voluntary maintenance of trails and paths is already co-ordinated and encouraged in the Park.

15.12 8 Security of Activity users:
– There has been a history of attacks and muggings on visitors in the Park.
– The Park should co-operate with security interest groups, such as neighbourhood watches.
– Systems should be implemented for the rapid communication of security incidents with interest groups and service providers providing active security and monitoring services. These groups often facilitate rapid communications with Police to facilitate the arrest of suspects.
– The total costs of providing security should not be borne directly by the Park. Security arrangements are already a part of daily life in the City. There are already neighbourhood watches, private security services, municipal law enforcement and national police patrolling the City. The Park should co-operate with these security providers to help control crime that overflows into the Park boundaries.

The Park should facilitate a “neighbourhood watch” organisation consisting of Activity visitors and other regular visitors to help monitor security in the Park.

Response: Noted, these suggestions can be carried through to the Action for updating and reviewing the Safety and Security Plan for the Park in Section 10.6.7.

15.13 Section 11 (Budget and Cross Subsidization of Parks) of the Management Plan deals with the Park Budget. This section of the plan is regarded as inadequate. While it does outline various elements of expenditure and an overall income budget, no detail is given at all with regards to the sources of income for the Park.

Response: Table 11 (Revised Draft Plan) in Section 11.2 has been updated to show the high level income streams.

15.14 I note, with particular concern, from the Finances Table 10 on page 116 that SANParks anticipate an annual surplus from TMNP which will reach R65 Million by the year 2020. The inhabitants of Cape Town already pay local, provisional and
national taxes. This paragraph implies that the inhabitants of Cape Town who make use of our mountain will be “taxed” to fund the SANPark overheads and other Parks. As the residents of Cape Town and the City Council have no direct control over the management of the Park, this represents taxation without representation.

Response: Table 11 (Revised Draft Plan) in Section 11.2 has been updated and shows that Park income is primarily gained through tourism.

| 15.15 | If SANParks envisage any “cross subsidization” between TMNP and head office overheads and other Parks, the whole issue of finances must be handled with openness and sensitivity. Thus this management plan should require of TMNP to publish a budget for the park on an annual basis. This should indicate:
  1 Major sources of income:
    - Entrance fees paid by visitors to the major access controlled facilities.
    - Income from the Cable Car operator, hotels and tour operators within the Park.
    - Sales of Activity permits and day permits.
    - Income from commercial activities like film making.
  2 Major expense items:
    - Staff costs.
    - Equipment costs.
    - Cost of alien vegetation control and fire management.
    - Cost of land acquisition.
  3 Surplus or shortfall returned to or funded by SANParks.
  4 Financial details of other activities in the Park funded externally to SANParks such as:
    - Fire management arrangements.
    - Alien vegetation eradication projects.
Financial contributions to projects by third party interest groups, like the construction of cycling trails.

Response: SANParks has developed a Manual in terms of the Promotion of Access to Information Act (PAIA) which is available to the general public on its website and the public is encouraged to make use of PAIA mechanism to access information.

| 15.16 | Cycling activities in the Park can be broadly categorized into two groups:
  1 Sport Mountain Biking:
This implies a race against fellow cyclists and/or against the clock. This normally involves cyclists racing downhill on specialist cycles wearing protective gear over courses that are constructed with features to challenge the cyclists. Obviously this Activity is not compatible with other users, like runners and horse riders, on the same track at the same time. Sport cycling can involve some climbing and level cycling too. There is scope for this Activity in the Park, typically in the previously forested areas. It is a high profile Activity that will attract many visitors as well as organised events, like the Cape Epic, which is currently one of the most prestigious Mountain Biking events in the world. I know there are ambitions to construct (and reconstruct) a network of cycle tracks, many of which will be devoted to sport cycling. This will take considerable time, but I hope that these materialize eventually and that when they do, other users will respect those tracks which are designated for cycling use only.

  2 Touring Mountain Biking:
A more gentle form of cycling is to use a mountain bike as a means to visit remote regions of the Park. This is very rewarding form of exercise and it is more time
efficient than hiking, enabling the cyclists to see more of the Park within the available duration of a visit. This can easily take part alongside other users like runners and horse riders. But it requires a mind shift from cyclists in that they must give respect for fellow Park users a higher priority than any speed/time objectives. There are many parts of the Park, particularly areas that are designated as “Remote Visitor Use Zones”, that could be opened for this type of cycling. Many of these could be opened with short lead times. For example, the jeep track from Constantia Neck up to the dams, jeep tracks in Silvermine east of Ou Kaapse Weg and jeep tracks in Cecelia Forest above Rhodes Drive. There are many other routes where combined cycle/horse riding/hiking tracks could be constructed in an ecologically friendly manner. Many cyclists and horse riders alike dream of a route that circumvents Table Mountain.

In order for these two forms of cycling to exist side by side, cyclists and other mountain users will have to be made aware as to what behaviour is required of them in different parts of the Park. This is part of the proposed Activity Management Program.

**Response:** These are useful and interesting ideas and suggestions which can be carried through to the review of the respective recreational EMP.


16.1 Much of the content of the PMP is entirely understandable and is easily supported. Thus the Remote Core, Remote, Quiet, and Low Intensity Leisure zones are logical and supported.

**Response:** Noted

16.2 As is acknowledged by the PMP, TMNP is an open access park, to which the City of Cape Town’s residents have enjoyed unhindered access for more than 100 years, prior to SANParks involvement. Thus the popular entry points to the Park, such as Kloof Nek and the Pipe Track and environs, Signal Hill, Deer Park and Tafelberg Road, the area around Rhodes Memorial and Mount Pleasant, Newlands Forest Station, Cecelia car park, Constantia Nek, and the east Silvermine area, amongst many others, have been freely accessed and enjoyed, as a right, by the citizens of Cape Town for general recreational purposes, primarily walking and running, for many decades.

**Response:** Noted

16.3 Activity Cards & Clause 17 of the Heads of Agreement.

The objection that many citizens have, relates to the PMP requiring “activity cards” or “special permits” to be carried for certain normal recreational uses in these areas. For decades folk have taken their exercise in these “Quiet zones” accompanied by their children and family dogs, because it is something families enjoy doing, and now also as a perception of some additional personal security, given the level of criminality on the mountain.

Clause 17 in the original Heads of Agreement with the City, specifically stated that no new charges could be raised in relation to the City’s residents using the Park, without the specific agreement of the City of Cape Town. This clause was inserted in order to prevent the Park’s new guardians imposing entry fees on the City’s
citizens, who are the owners of the land that has been voluntarily incorporated into the Park. The Cape Town municipality, i.e. the ratepayers, still own 15,500 ha.s of the Park’s declared area of 20,700 ha.s – (SANParks own figures). i.e. 75% of the declared Park area remains in City of Cape Town ownership, and thus belongs to all who live in the City of Cape Town.

The requirement for each member of a family to purchase their own individual “activity card or special permit” in order to walk the same family dog/s in these high frequented recreational areas is clearly ridiculous, and is in conflict with the spirit of Clause 17. By calling for a “special permit” in no way disguises the fact that SANParks is raising an entry fee on Cape Town’s citizen without the City’s approval. While it is true that some of these general areas were, and are, not in City ownership, the citizens have always enjoyed free access to those areas.

Response: See General Response 5.1.1

16.4 The PMP acknowledges (pg 33-10) that “activity cards are not widely supported”, and “there is a limited understanding of the concept”, and “activity card administration is not user friendly”.

Hence, given the difficulties, and significant inefficiencies, inherent in the activity card system, as recognised by the PMP, TMNP needs to reconsider the concept.

“Special permits &/or activity cards” should only be required where they can be successfully & efficiently administered, which would include for commercial activities in the Park, such as filming, advertising & tour guiding for commercial gain. The key phrase being for “commercial gain.”

Further, given TMNP’s limited resources, staff could be better used patrolling to prevent criminal activities, rather than chasing individuals to check whether they are carrying a dog walking, or similar, permit.

It is recognised that there needs to be a level of control of domestic animals within the boundaries of the Park. This could be more efficiently achieved by recognising “dog walking” as an acceptable activity in the “Quiet” & “Low Intensity Leisure” zones, and by only requiring permits in the Remote zone, and by prohibiting dogs entirely from the Remote Core zone, for example. These issues need to be more fully debated with the local residents, if SANParks hopes to have an acceptable system that can be successfully implemented.

Response: See General Response 5.1.1

16.5 The Safety and Security programme. - Page 107 - Section 10.6.7

While recognition is given to the current levels of criminal activity within the TMNP, such as muggings, and, in one instance, murder, the emphasis in the PMP appears to be on managing the associated negative media reports that are the result of such criminal activity, rather than promoting, for example, more wide spread foot patrols, and related pre-emptive activities, within the Park, which might reduce the opportunity for such criminal activity to occur. In this regard, the example of the Ezemvelo KZN Wildlife Parks Board’s system of frequent ranger foot patrols could be studied to some significant benefit.

Response: Noted, this suggestion can be carried through to the Action for updating and reviewing the Safety and Security Plan for the Park in Section 10.6.7.
16.6 The Table Mountain National Park Management Plan has much in it that will be support by most visitors to the Park. There will be better buy in to the PMP’s implementation by the City’s residents who use the Park on a regular basis if more attention is given to the needs of the local residents on a variety of fronts.

Response: Noted

16.7 There is an unfortunate perception that one of SANParks major objectives is to “tax” the users of the TMNP for as much money as is possible, as is admitted as much on pgs 89 & 90 of the PMP.

Response: The bulk of income in the Park is sourced from tourism and concessionaires. See Section 11.2.

16.8 Clearly TMNP has to raise funds where they can so as to finance & protect the TMNPark itself, and to help SANParks generally. However, there needs to be a better balance between the need to raise funds and recognising the rights of all of Cape Town’s residents to enjoy this unique, to South Africa, “open access” Park.

Response: Noted.

16.9 I trust that there will be further opportunities to take this discussion forward before the Park Management Plan is adopted.

Response: In terms of the generic SANParks’ consultation process, comments are all responded to in writing and concerns addressed and the Draft Plan is reviewed accordingly and submitted to DEA for approval by the Minister.

16.10 Many users to the TMNP on a regular basis hold full or partial “Wild Cards”, they are already voluntarily contributing financially to SANParks. Thus it is not about the small charge that I am objecting to, it is the principle of having to carry a piece of paper when I am exercising, as is my right, on the lower slopes of the mountain. There needs to be a better system.

Response: Noted

17. Table Mountain Watch Email: 08 May 2015

17.1 The re-establishment / rejuvenation of the TM National Park Forum is vital to successfully achieving the objectives outlined on Page 108 (Safety and Security Programme) during the period envisaged.

Table Mountain Watch would request the appointment of a formal representative(s) on the Forum (for Mountain Users in general):
- to head up and coordinate Security related inputs and initiatives that affect all Mountain Users (groups and/or individuals)

An undertaking to do so should be documented in the final plan under the appropriate section for the Park Forum – and alluded to in the Safety and Security section at least.

Response: See General Response 5.1.3.

17.2 Table Mountain Watch requests the inclusion of a “Sub-Objective” stating:
- “… To develop a pro-active and sustainable Crime Prevention Strategy in conjunction with all Mountain Users (Groups and Individuals)…”
- The ‘Safety and Security Programme’ makes no mention of working together with mountain users and stakeholders to focus on particular
Crime Prevention initiatives. The Park Forum (see Point One) would be the ideal channel to enable this partnership approach.

**Response:** Noted, this suggestion can be carried through to the Action for updating and reviewing the Safety and Security Plan for the Park in Section 10.6.7.

**17.3 Table Mountain Watch requests the further inclusion of a “Sub-Objective” stating:**

- “… To develop a suitable bi-directional alerting / notification process using modern communication methods and systems which would be activated immediately a contact crime occurs”
- This process should be jointly owned (Mountain Users / TMNP Visitor Safety) and carefully managed according to agreed criteria and operating procedures, with its primary focus being the urgent and immediate alerting of people who may be in harm’s way, as well as a call to assist with spotting and reporting perpetrators who may still be in the area.

Further notification would then include the use of various media platforms to communicate salient details to ensure an appropriate measure of mountain user awareness and education as to how to avoid such conflicts.

**Response:** Section 10.6.7 has an action that aims at exploring technology to address crime risk in the Park, which would include the above.

**17.4 Development of Signal Hill:** This idea and proposed development is very much welcomed as it will ultimately eliminate or displace the current criminal element in the area. Equally though there needs to be a similar initiative planned for the Higgovale Quarry general area. This area has become neglected to a large degree and is attracting opportunistic criminals and bad elements. TM Watch would like to see mention that this area will be investigated and that suitable solutions will be sought – to ensure the area is addressed over the next 5 to 10 years. Failing to do this will see the criminal elements displaced from Signal Hill / Lions Head and even Rhodes / Deer Park gravitate towards this area.

**Response:** The Higgovale Quarry site has been assessed does not lend itself to an immediate alternate use. The area forms part of normal operational area integrity.

**17.5 Table Mountain Watch would like to see the broader vision of the park (TMNP and even for SANParks) include the words or the vision statement:** …… “We see a Park that will be safe and secure for all of its visitors ……” in the current Park Mission.

**Response:** Noted: “this intent is covered by … ‘excellence in management…”’ in the current Park Mission.


**18.1** The equestrian user group has historically had use of large areas of the park, predating the proclamation of the TMNP, in areas including Constantia, Tokai, Noordhoek, Hout Bay and the South Peninsula around Kommetjie, Redhill, Scarborough and Glencairn. Horses were used in the Park first as a means of transport, and then riding became a recreational pursuit, both for enjoying nature and training for competitive equestrian sport.

**Response:** Noted.

**18.2** The Tokai Riding Club is the entry to formal equestrian sport, through the Western Cape Equestrian Federation, provincial sports confederation and ultimately falling under SASCOC and the Department of Sport and Recreation.
The club makes use of a facility directly on the border of the Lower Plantation and draws members from the greater Tokai and Constantia areas. Access to the grounds is via the bridle paths in the Park. There are approximately 125 horses in immediate area and the facility has some 60 members. It is the home base of the Tokai branch of the Pony Club, part of an international youth development movement.

Response: Noted

| 18.3 | The purpose of the Park (Section 5) is “To ensure the development of a prosperous, healthy, culturally rich and scenically attractive Cape Peninsula for the benefit of all residents and visitors and the optimal use of the area’s unique set of natural and cultural resources... Fuggle, 1994.”

We submit that the equestrian community resident on the borders of the Park should benefit from use of the Park to the greatest extent possible within the parameters of environmental sustainability, and that restricting existing and possible futures rights to use the Park should not be done lightly and only with sound motivation in consultation with the equestrian stakeholders and users.

Response: Noted, SANParks is not aware of any such rights that equestrian users have in the Park.

| 18.4 | Point 10 in Section 5.6 refers to conflict between user groups. This is could be mitigated through better enforcement of the activity permits for all groups and a better understanding of the needs of the equestrian user group for space set apart from dog walkers and intensive mountain bike activity. The administration and issuing of permits used by horse-riders also needs to be handled more professionally. The permit system should be better communicated to the residents of Cape Town, who are the regular users of the Park for recreation.

Response: See General Response 5.1.1

| 18.5 | The Tokai Riding Club supports the management plan in all aspects that promote the sustainable use of the Park for horse-riding purposes. This activity is confined to existing trails and management tracks and it is submitted is a low-impact one, compared with other recreational uses. Nor does it require visitor facilities.

Response: Noted. Recreational activities impact on the environment to varying degrees but the cumulative impacts are a concern. See Key Actions in Section 10.2.1.1 of the Revised Draft PMP that address the management of impacts by recreational users.

| 18.6 | Regular use of the Park can also contribute to the general safety and security for users, and enforcement, as horse-riders can cover large distances with a good vantage of unlawful or possibly criminal activity.

Response: Noted

| 18.7 | The Tokai Riding Club supports the use zones and the inclusion of horse-riding as an activity in all but the Remote Core areas. In terms of future development, and to ensure that equestrian activity can continue within a densifying urban environment, we would urge greater linkages between riding areas, along management tracks and roads, across the Park.

Response: Noted. This would need to be addressed in the EMP review for
horse-riding.

18.8 Such an equestrian trail would contribute to potential growth of equestrian tourism operations and trail rides, allowing more people to appreciate the biodiversity of the TMNP from horseback.

*Response:* Noted. This would need to be addressed in the EMP review for horse-riding.

18.9 Tokai: In the wake of the devastating fire in the plantation areas on the slopes above the Manor House, the equestrian community would like to be consulted about, and involved in, rehabilitation of the tracks in the horse-riding areas.

*Response:* Noted. This will be addressed in the Tokai track rationalisation planning process (see Section 9.2.7 of the Revised Draft PMP.

18.10 The Tokai Riding Club supports the plans for the Tokai Manor House precinct plan (Section 9.1.5) and urges more rapid progress on developing the equestrian area within this plan to consolidate and support equestrian use of these areas. This should be done in consultation with equestrian stakeholders, in particular the Tokai District Riding Association, so that development in this node is accessible to the wider equestrian community on an inclusive basis.

*Response:* Noted.

18.11 Rationalisation of existing management tracks (Section 9.2.7) should not limit the area and length accessible to horse-riders, as short routes that are not linked to form coherent circular trails become unviable for horse-riding.

*Response:* Noted. This will be addressed in the Tokai track rationalisation planning process.


19.1 Mountain biking is spelt either as 2 words or one. Never hyphenated.

*Response:* Noted

19.2 Section 2 – Legal Status

The word ‘healthy’ is used 9 times in the entire management plan, and when used, refers to the ecosystem. The Plan needs to recognise the very important contribution that the Park is making to the overall public health of the residents of the City of Cape Town. With the prevalence of obesity and the expected pressure the issue will place on government health departments’ worldwide, the issue of public health enjoys a much higher profile in similar management plans around the globe.


19.3 Section 5.6 (2. Open Access)

The open access statement is misleading as activity permit holders need to pay for access. In many cases the user has to pay to access non-structured/non-rewarding opportunities. Modern recreational users rarely complain to pay a fee to enjoy a rewarding opportunity.

*Response:* See General Response 5.1.1

19.4 Section 10.4 Responsible Tourism management

The focus of preparing/planning for tourists should be less concerned about attracting tourists and the effect of the economy on their financial ability to visit a
Table Mountain is a ‘bucket-list’ destination of world travellers. They will come.

Plan for your local residents and tourism will follow. The move to activity based/experiential tourism should be an indicator that quality product is required.

This means quality trails, maps, access hubs and peripheral services like equipment rental, transport and guiding.

Recreation experienced an explosion during the 2008 recession as people focused on local, healthy attractions. Mountain biking, despite the potentially prohibitive cost of the activity, saw its largest growth spike during a worldwide recession. Similar for trail running.

Whistler resort in Canada is North America’s largest skiing and mountain bike destination. 85% of visitation to this park is from with 1h30 travel, emphasising the fact that your ‘tourist’ is primarily a local.


19.5 Section 10.4 Constituency building

The plan focuses primarily on generating new constituents while being fairly silent on building the relationship with existing users. Citizens who use the Park for health/recreation purposes might not do so primarily for environmental/biodiversity appreciation but certainly become the custodians of green space over time.

The cultivation of Green Space Appreciation amongst existing and new recreational users should be a core focus of the plan and the easiest way to do this is to provide the playground that encourages higher visitation, especially in the non-core areas of lower biodiversity status. The Lower Rhodes Memorial precinct is a good example of an area that can accommodate a lot more low-impact activity by providing a more rewarding trail experience.

A percentage of users of these ‘buffer’ facilities will progress to venture into areas of higher biodiversity and a more core nature experience. From a management point of view the Park will rarely see its core biodiversity areas become overcrowded as these sites, in most cases, require considerable exertion due to the topography of the park.

The conversion of recreational users to stewards should be seen as a ‘low hanging fruit’ opportunity.

Response: Noted. Addressed in the Stakeholder management objective in Section 10.5 of the Revised Draft Plan and in the Responsible tourism enhancement objective in the Revised Draft Plan.


The writer is in effect, the “last man standing” of the TMNP Forum which was instituted more than 10 years ago. While the Forum as such is moribund, the
writer as Acting Chair (after the resignation of the previous Chair), has endeavoured to keep the lines of communication with the Park management open in order to allow for at least some more or less informed input into the various issues surrounding the management of the Park.

**Response:** Noted

### 20.2

There is one overriding issue that is absolutely key to improving the management of the Park and the conservation of the heritage – both “natural” and human - that is Table Mountain. This one overriding issue is communication. Communication, in all its manifestations, is vital to the smooth running of any enterprise and particularly the TMNP with its multitude of stake holders and “interested and affected” parties.

**Response:** See General Response 5.1.4

### 20.3

**Internal communication**

This is demonstrably lacking. Decisions taken by senior management do not always seem to be communicated down the line to the field personnel who interact with mountain users and the general public. A case in point is the well-established norm that “traditional” rock climbing is not a permit-bearing activity. This has been the subject of discussions on a number of occasions since the incorporation of the Park but still climbers going about their business are hassled by rangers who do not know or understand the difference between the various facets of rock climbing.

**Response:** See General Response 5.1.4

### 20.4

**Ranger communication**

This raises the point of informing the rangers as it is appreciated that the multicultural nature of the ranger force and (no doubt) the turn-over of staff, that not all the rangers at any one time can understand everything. However, the offer has been made now on several occasions, to run small workshops for the field staff such that they may understand and appreciate the various activities that are carried on in the Park. This would make for much better relationships between the rangers and the mountain users. As things stand, the ranger corps is largely viewed by the public as an adjunct to the police forces and while this is a necessary facet of their activities, they should – and could – be so much more than that. This has to be put down to a lack of training although it is appreciated that recruiting rangers from the Eastern Cape rather than, say, the more “local” communities does serve to exacerbate this problem.

**Response:** See General Response 5.1.4

### 20.5

**“Public” communication**

SANParks has a fine product in the Wild Card and TMNP has a very useful adjunct in the “Cape Town Card”. However, communicating the value of these to the public in Cape Town has, in my view, failed lamentably. The idea of a “Park for all, for ever” is beyond admirable but unless the word is out there in the communities – notably, the disadvantaged areas away from the immediate vicinity of the urban edge – then that all-inclusive concept will fail. I fully appreciate the difficulty in spreading the good word but if minds are applied – and perhaps not just the TMNP Managers’ minds – then possibly there may be a positive outcome.

**Response:** See General Response 5.1.4

### 20.6

**Activity Cards**

Another, absolutely vital area of communication concerns the Activity Cards – the permits which allow for activities deemed to have an (environmental) impact on the Park. Hiking, scrambling and traditional rock climbing are deemed to have a
zero impact and anything over and above these activities requires an Environmental Management Plan (“EMP”) and attracts a permit. The concept is reasonable – the implementation is not good. Again, the communication around the Activity Cards is extremely poor and misunderstandings and misconceptions are rife. A large majority of the mountain using public view these cards simply as a money-making scheme to satisfy Pretoria – indeed, the pressure upon the Park management to satisfy Pretoria’s norms is intense, I am told. While there has been some consultation with user groups over certain of the cards, this can only work if the user group has a more or less formal organisation that can speak for the majority of participants. This works moderately well for some activities but for other, e.g. dog walking, mountain biking, there are just too many users who are not associated with the relevant associations. For example, there are thousands of dog walkers who utilise various areas of the Park and it is safe to say that the majority do not have a “permit”. This is largely down to communication. Additionally, when there are organisations prepared to co-operate with the Park management, e.g. bouldering, to the extent of preparing (and paying for!) an EMP, one would expect that the Park would at least acknowledge these efforts and be somewhat appreciative. But what happens! A deafening silence!

Response: See General Response 5.1.1

20.7 TMNP Forum
The Forum was set up with the best of intentions – of this there is no doubt. However, the attempt at being all-inclusive certainly did not work. There was a core of individuals – perhaps four or five who kept the Forum active and tied to keep it relevant but the idea of 17 people on a committee... Doesn’t work. The few really active members – did some very useful work – notably interacting with middle and senior management and assisting in the recognition of strategic issues.

However, as time went by the numbers dwindled even further and eventually, to all intents and purposes, I was the only active member utilising the Forum’s name and “clout” in order to at least comment on issues such as tariff increases.

Currently, this is the situation and it obviously has to change. The Forum is, I believe, a statutory requirement of all National Parks and to have one of the premier Parks in South Africa – and one within the city limits largely – without a Forum to interact with the Park management is nothing short of ludicrous.

Some desultory conversations with Park management over the last two to three years revealed a broad consensus that the Forum, as it was conceived, was not viable and that an alternative needs to be found. Various proposals have been put forward i.r.o. this but the silence from the Park has been deafening. One is left with the impression that the Park management views the Forum as superfluous.

Response: See General Response 5.1.3

20.8 Bi-lateral communication
This is a critical part of the Park’s management in that it deals with the relationship with the City. There are bi-lateral meetings every so often (quarterly?) and these are supposed to be a feedback – from both sides – in order that certain common issues and opportunities can be worked out. That this is not functioning well, is illustrated by the fact that recently, a public meeting was held (at which nine
councillors were present) in order to discuss the various issues that the public (mainly mountain users) deemed to be significant. If the bi-laterals were functioning properly – and if the Forum was active and informed – this meeting may well have been superfluous. Obviously, this is a two way thing and the City also needs to play its part and communicate better.

Response: Noted.

20.9 In attempting to address some issues for various groups over the last year and in the course of this I was writing to the Park management. I eventually ended up sending the same e-mail (with some additions) for eight months! I never even had an acknowledgement.

Response: Noted.

20.10 I would also like to point out a fact that I generally raise at any meetings concerning the Park that we should remember that the Park does not belong to SANParks, nor to the Park management but to all the people of South Africa. We look after it for our children.

Response: Noted.


21.1 Fire Management:
The recent fires across the peninsula in particular the devastating fires of March April 2015 which swept from Muizenberg to Hout Bay and came perilously close to jumping the neck at Constantia Neck gave us huge cause for concern and it is as a direct result of discussions with the executive of the CPOA of which I sit on the executive that I make these comments.

Response: Noted

21.2 The CPOA is extremely concerned at the state of Fire control measures and wishes to bring this matter as SERIOUS concern to the attention of the management of SANPARKS and more specifically the TMNP management. We read that past attempts to clear and burn adequate firebreaks were unsuccessful due to “concern from local residents that their washing might get soiled”. Sir, we regard that as a completely unacceptable level of engagement and reaction. Firebreaks of adequate proportions and constant maintenance are REQUIRED to protect your asset and the assets of your neighbours. Having regard to section 10.2.1.2 (I believe) dealing with fire prevention measures, it is unclear as to the IMPLEMENTATION PLAN that should be both detailed and comprehensive, a matter I regard as imperative.

Response: The response of vegetation to fire is reasonably well understood by the general public, but the use of fire for conservation purposes remains controversial and people usually raise objections every time prescribed or stack burning operations are carried out within the wildland urban interface. TMNP has prepared a prescribed burning program for the Park and the programme determines and prioritises areas for prescribed burning on an annual basis. Also, please take note that TMNP prepares and maintains the circum-peninsula fire break network on an annual basis and the method of preparing is not by burning but by brush cutting. The complaint received is therefore not applicable to the clearing of fire breaks as such but refers to prescribed and stack burning operations due to the inconvenience caused by the smoke.

21.3 The firebreaks along the side of the forest (Plantation) adjacent to the TMNP throughout the region and in particular along Rhodes drive are completely
inadequate and likewise the road reserve maintenance, while you may suggest that the latter is not your concern I disagree and I believe the level of engagement with your counterparts in Roads dept is ineffectual and a worrisome concern. You should be forcing them to adhere to acceptable levels of alien vegetation control and clearing on both sides of the road reserve to assist you where the fire break cannot of necessity reach your required cleared width or specifications. This bears on the issue of COMMUNICATION to be dealt with presently.

**Response:** According to the National Veld and Forest Fire Act (101 of 1998) every owner on whose land a veldfire may start and spread from must prepare and maintain a fire break on his/her boundary. The Act is not prescriptive in terms of the width of fire breaks and it is therefore for the landowner’s discretion as to what the width should be (taking into consideration the prevailing wind, vegetation, terrain, etc.). TMNP in developing and maintaining the circum-peninsula fire break network has decided to clear most fire breaks to a width of ±20 meters. The fire break referred to (along Rhodes Drive) is however not maintained by TMNP but by Cape Pine, the forestry company responsible for the harvesting of Tokai plantation. The clearing of road verges is a City responsibility and TMNP has no jurisdiction over the clearing and maintenance of road verges within the boundaries of the City of Cape Town.

### 21.4

The cross mountain firebreaks NEED to be both redesigned and strengthened and widened to prevent the type of catastrophic loss to your own asset and neighbouring properties as was most recently observed. The current plan does not come close to addressing the detail of a comprehensive plan that provides the city and its residents with comfort.

**Response:** The cross mountain fire breaks have been abandoned in the early 1990s due to their ineffectiveness, especially during major fires. Fire breaks are not designed to stop fires but to slow down/stop the spread of a light surface fire, to serve as a line of defence from which to work and back-burn if necessary and also to facilitate the movement of men and equipment during fire-fighting operations. The circum-peninsula fire break network has replaced the outdated cross mountain fire breaks and was designed to protect life and property on the wildland urban interface against wildfires.

### 21.5

**ALIEN vegetation control:**

Many of the above comments apply equally here and it’s the pervasive nature of the alien vegetation within the TMNP that is a great concern. You have handed over the removal of the pine forest plantations but what about the Blue-Gums which are mostly located along mountain water courses and sap the valuable water. No discussion on their removal is evident. This is a gross omission and needs addressing. If you took what many people regarded as a perfect asset (the cool sweet smelling pine plantations) out, how do you justify not dealing with the Blue Gums?

The removal of the pine plantations was ostensibly to allow for Fynbos to re-establish, but Zero management of that process is afoot I note as I live directly adjacent to such a section. I am extremely concerned that when the Fynbos does burn as it must every 7 – 10 years, my property and my neighbours will be under extreme threat. There are NO fire hydrants along Rhodes dive in the area in question. Again I argue that as you took the unilateral decision to remove the +/-70
year old pines and replace that with fynbos, you should engage with the relevant departments concerned to ensure that fire hydrants are accessible and suitably marked as a fire will at some stage break out and will need resources to control its effects.

Response: The decision to phase out the plantations was taken by the then DWAF. This was outsourced to a private company to be harvested over a 20 lease period. The gums currently form part of the plantation area to be harvested in terms of a harvesting schedule. The City of Cape Town is responsible the provision of fire-fighting services to the urban areas.

21.6 Communication and TMNP access cards go hand in hand. Here regrettably I must state that it is my personal opinion that you have failed dismally, by your own admission at the meeting held at Newlands forest. Nothing short of a total rethink and redesign of the entire communication strategy and implementation plan will suffice.

Here I take as an example that you claim to have advertised adequately, I fail to believe that only a dozen (if indeed there were that many) Cape Town residents or concerned citizens present at the meeting, your staff and some apparent management from up country made the room look more full than the reality was of attendance. I am told it was the same elsewhere.

Why you did not sent an email, sms it interact with the 10,000 card holders, they are within your captive market range..... a missed opportunity to receive both positive and negative comment on the TMNP management plan....

The argument that there is a legal requirement (for activity permits) does not wash, sign boards giving helpful information and advice and bearing a disclaimer is more than adequate, and use the public media to engage with the people who want to use the mountain always stressing that “you should take good care of yourself and others” If some lawyer states it’s a necessity, get another lawyer! That just smacks of corporate stagnation and not innovative thinking, I’m sorry to say.

Response: See General Response 5.1.1

21.7 Geological engagement: (but read biological, environmental, Zoological, natural water ways......)

As a geologist and a fellow member of the GSSA, we are very proud of the mountain and the number of fine articles that have been written on the “koppie” and its intended educational role. Engage please and you will find both willing and able and mostly KEEN assistance which can and should be used to your advertising benefit. Not surprisingly at least two of the members of the public present at the meeting were/are geologist and active on the Mountain issue(s).

Engage with active groups and you may be pleasantly surprised at the warmth of response. The runners, Horse riding fraternity, cyclists and mountain bikers who want to use the mountain and an equally proud and active groupings, you should try a different approach to the Top Down “We state you will do the following or else!” approach.

Response: Agreed, TMNP continues to interact with a range of stakeholders and recreational user groups.

22.1 2.12.11 p19- how much fund raising is done in support of developing youth and in providing environmental education?

**Response:** Fundraising for Youth Development and EE programmes is done all year round and also as and when the need arises. The fund-raising is done at two levels:
1. National - where the funds raised are for all the parks throughout the country. An example is Kids in Parks where the funds are distributed to 10 participating parks per annum and in 2014/15 R1,797,368 was made available.
2. At the Park level – where funds are raised specifically for Youth development and EE programmes at TMNP. For example Honorary Rangers and Volunteer groups have fund-raised in cash and in-kind for Junior Rangers and EE facilities such as Peoples’ Trail Hut and Sunbird Centre.

22.2 Park organogram p24 -there are nine functional areas reporting to the Park Manager. Does this overload the Manager and, if not, can he/she still function effectively?

**Response:** The Managers of the functional areas operate as a team with the Park Manager, thereby improving efficiency.

22.3 4 p26 - publicise the Honorary Rangers programme

**Response:** Noted

22.4 5.3 p29 – threats to conserving and preserving unpolluted water sources should be included in the key high biodiversity risks.

**Response:** Agreed, Draft Plan updated.

22.5 6.7 p39 – add “with the participation of interested and affected stakeholders”. SANParks cannot effectively police the Park – it is too open for criminals not only to enter but to hide in. The SAPS and trained volunteers with mountain skills can reduce the number of criminal acts, especially after usual working hours.

**Response:** Noted, this suggestion can be carried through to the Action for updating and reviewing the Safety and Security Plan for the Park in Section 10.6.7.

22.6 7.9 p49 – research is needed on the reasons for and extent of theft of material for medicinal purposes and on how to educate the communities in sustainable harvesting

**Response:** The Resource Use Programme (Section 10.2.4) outlines the activities wrt harvesting from the Park, of which research is key component.

22.7 10.5 p95 – in addition to Specialist Forums and other groups, re-establish the TMNP Forum with its broad range of constituencies with varied skills, experience and interests as a general contributor to activities. This could also serve as a source of volunteers for many of the Park's programmes. A number of organisations run outreach programmes for youths and linking in with these would benefit the youths and the organisations. The plan acknowledges that the main challenge is Park capacity and funding, and volunteers do provide ways for meeting this challenge.

**Response:** See General Response 5.1.3.
| 22.8 | 10.6.5 p104 – in addition, conduct periodic surveys of users such as tourists and user groups such as tour providers to discover trends that will inform planning.  
*Response:* Agreed, in the Draft Plan the Responsible Tourism Programme within the Service Quality has Objective has the sub-objective to “Conduct appropriate research to understand and address visitor and recreational users expectations” |
| 22.9 | 10.6.7 p107 – see comments on 6.7 above  
*Response:* See response to 22.5. |
| 22.10 | 10.2.1.3 p74 – road kills could be reduced through displaying public signage, eg “leopard toads cross here!”  
*Response:* Signage within the road reserve falls within the ambit of the City of Cape Town. The Park does frequently liaise and recommend a range of appropriate signage for the Park. |
| 22.11 | 10.2.5 p83 – the environment, especially in heavily-trafficked areas such as Newlands Forest, is degrading at an alarming rate, so the budget may need to be readjusted to allocate more funds for rehabilitation  
*Response:* Allocation of rehabilitation budget is reviewed annually in line the priorities identified in the Park’s rehabilitation programme. |
| 22.12 | I am in support that traditional and free climbing can take place in remote core areas.  
*Response:* Noted |
| 22.13 | Thanks to the TMNP team for a well-thought out, comprehensive and well-presented plan and annexures  
*Response:* Noted |

**23. Hout Bay and Llandudno Heritage Trust**  
**Letter: 09 May 2015**

**23.1** The origins of the Table Mountain National Park (TMNP) go back to the Table Mountain Hey Commission of 1978, and its report of recommendations for the preservation of the then entire Cape Peninsula Protected Natural Environment (CPPNE), from the Table Mountain chain right down to Cape Point; which at the time was visionary. The initiative ultimately resulted in a significant document in 1998, the “Heads of Agreement” (HOA) which was the cornerstone of the vision agreed by the City, the South Peninsula Municipality, the Province, and SANParks, which led to the establishment of the TMNP.  
We suggest that the HOA document should be referenced in Section 2 of the current TMNP Plan and links to the original document made available to the public and that an understanding and interpretation of the HOA should preface the assessment of the Parks Management Plan. We appreciate that as the HOA is probably somewhat outdated, some sort of amendments may be required and suggest that the current Management Plan process would be the ideal time to initiate such improvements in discussion with the City and the Western Cape Province.  
*Response:* Subsequent to the various studies referred to, the establishment of the Park was initiated by the national Cabinet resolution referred to in section 2.3 of the draft Plan. The Heads of Agreement with the City of Cape Town is also referenced in Section 2 and will be amplified to reflect its intention.  

**23.2** Since the Park’s creation several TMNP reports & management related plans
have been published, based on a five year cycle, setting out the Park’s intentions for short medium and long term projects; the intention being to further conserve the Park’s assets and develop sensitively planned visitor attractions and destinations. We understand that such developments are subject to many conservation rules required by Acts of Parliament and International conventions.

*Response:* Noted

### 23.3 The Park’s relationship to the City of Cape Town

The Cape Peninsula is unique for several reasons; its geography, geology, flora, fauna, and its climatic conditions. It either has urban pockets surrounding it, or borders on the ocean. For these reasons it is unique amongst South Africa’s national parks and reserves. As an Urban Park it is dependant for its services on Cape Town and the surrounding communities through which visitors are channelled. Hence the City, the Park and the abutting communities are inextricably linked.

The TMNP is dependant to a large extent on tourism for its revenue. The abutting communities at the southern end of the Park are also dependent on tourism but, unfortunately, little, if any, direct cooperation would appear to take place between them and the Park. We suggest that it would be desirable for much greater cooperation to exist between the TMNP and its neighbours and that the management plan should include positive steps to this end.

*Response:* This is a good suggestion and addressed in section 10.4 of the Draft Plan under the Responsible Tourism Product management objective and the Action “actively engage with tourism role-players to promote the Park.”

### 23.4 Financial disclosure.

Whilst some abbreviated estimate budgets for future years’ expenditure are shown, little if any information is at present disclosed regarding the financial status of the Park. This secrecy is unfortunate for the bulk of the TMNP’s land area was provided by the City of Cape Town and the people of Cape Town provide the TMNP with the bulk of its visitors. We firmly believe that the management of Cape Town’s most important asset needs greater financial transparency towards its users. A comprehensive annual financial report, dealing solely with the TMNP and not consolidated with SANParks’ other activities and properties, would be a valuable builder of public support for the TMNP’s activities.

*Response:* SANParks has developed a Manual in terms of the Promotion of Access to Information Act (PAIA) which is available to the general public on its website and the public is encouraged to make use of PAIA mechanism to access information.

### 23.5 Conservation of Natural Heritage and Alien control

In general we agree with the natural heritage conservation policies adopted by the Park and compliment the TMNP’s staff for the excellent conservation work that has been done within the Park. However, whilst the boundaries of the Park are clearly defined, the ecological boundaries cannot be defined and thus spill over into the abutting Urban Communities and vice versa. Virtually all the invasive aliens in the Park were planted or have come from the abutting communities.

We know that the TMNP coordinates and works with the City of Cape Town on
alien vegetation control projects on both sides of the Park’s boundaries with the aim of ensuring the long term conservation of the Peninsula’s ecological integrity, and we applaud this initiative. However, as we are sure you are aware, the City’s resources for clearing alien infestations is woefully limited and we urge the Park to take action by every possible means to defeat this menace to the ecological integrity of the Peninsula mountain chain. We suggest that road reserves and river corridors should be particular target areas. The process of clearing infestations and the costs will continue unless greater cooperation is established.

We further suggest that the recent promulgation of the Regulations for the National Environment Management Biodiversity Act (NEMBA) makes the present an appropriate time to synchronise effort for combined action to be taken in invasive alien plant control with the Park leading the campaign, with the help of the local authorities, to ensure community compliance with the requirements of the NEMBA.

The Management Plan mentions a list of 239 identified alien plant species. Using the “Pareto Principle” or 80:20 rule, it should be possible to identify the 20% (48 species) which are the most prolific and dangerous invaders and publicise them in abutting communities via a website containing pictures and descriptions of the plants concerned. This information is probably already available at local Universities.

However, we suggest that coordination and promotion by the TMNP would be the most effective way to get the message across.

In addition, NEMBA lists invasive mammals including Grey Squirrels (Sciurus Carolinensis) which have become a common pest in Hout Bay. They have most likely migrated from the Parks previous pine plantations and appear to be having a serious impact on the local birdlife. As the problem emanated from the Parks property the problem needs to be addressed with their help.

Response: The extent of the problem is noted and control of alien species is addressed in Section 10.3.3.5, the Alien and Invasive Species programme of the Draft Plan.

23.6 Conservation in abutting communities, Rivers and Corridors
The advantage to the Park of gaining the full cooperation of communities regarding invasive aliens could be very substantial, as it appears that 25% of the Park’s budget is spent on alien control projects.

As a “Quid pro quo” the Park could encourage and engage in invasive alien projects in the abutting communities. We believe it essential that the TMNP also involve itself in the conservation of the rivers rising in the Park’s upper reaches which then flow through communities to the sea. Naturally such a process will require co-operation between the City, the Province and the Park as well as the relevant communities.

The various seasonal tributaries (e.g. Hout Bay’s river tributaries flow east and west) form natural corridors for birds and small mammals to traverse valleys, providing a contiguous route from one side of the Park to the other (Hout Bay Valley). The collapse of line fish populations around the Peninsula is mainly due to the destruction of wetlands and river estuaries by engineered interventions and pollution. Many of the Peninsula’s river estuaries at one time hosted fish nurseries of anadromous fish which supplied food to larger species higher up in the food chain. The Hout Bay River still hosts mullet (harders) which via trek netting provided local fishermen a living income until a few years ago. It makes
environmental sense that, where possible, functional “Fish Nurseries” be conserved in or out of the Park to serve adjacent Marine Protected Areas (MPAs).

Response: The importance of rivers and wetland on the Cape Peninsula is recognised in the Draft Plan in Section 10.2.6, the Freshwater Programme and Map 2. The City has a dedicated Invasive Alien Species Unit to undertake these tasks and SANParks co-ordinates closely with them. TMNP has an ongoing alien clearing programme to restore river systems within the Park.

23.7 Environmental Control Officer
Hout Bay has an urgent need for an on-site official who can attend to environmental issues within Ward 74 communities. This would obviously be a City appointment. Duties would include liaison with the TMNP, City and Province on environmental related matters. Such a person should also be represented on the TMNP Forum. Hout Bay has many environmental “hot-spots” which left to fester will continue to become greater headaches for the authorities.

Response: Noted

23.8 Conservation of Cultural Heritage
The Cape of Good Hope was the birthplace of Cape Town, established for its international strategic location to help secure trade between East and West. As the oldest surviving formal settlement in the country, it is understandable that the City could have more early-heritage sites than any other city in South Africa. Unfortunately destruction frequently follows development and many valuable heritage sites have already been lost for that reason. Nevertheless, a number of heritage sites still remain around the Cape Peninsula and some of them, including ones of International significance, once under the control of local municipalities or the Province, became incorporated into the Park in 1998.

It is understood that the TMNP’s World Heritage status was proclaimed for its Natural Heritage and that special conditions and legislation must be adhered to for the status to remain. However, the Cultural Heritage sites in the TMNP do not appear to have special status under the Park’s UNESCO agreement. The only observed reference to “cultural heritage” in the HOA would appear to have little significance.

However, the Park as well as all government, private bodies and individuals in South Africa are subject to the National Heritage Resources Act - No 25 of April 1999 (NHRA) which did not exist at the time when the HOA agreement was signed. This Act sets out the rights and duties of the TMNP towards the heritage sites within its borders in the following terms:

Rights, duties and exemptions of State and supported bodies
9. (1) All branches of the State and supported bodies must give heritage resources authorities such assistance in the performance of their functions as is reasonably practicable.
(2) All branches of the State and supported bodies must, on the request of a heritage resources authority, make available for its use and incorporation into its data base any information which it has on record on heritage resources under its control: Provided that the body supplying such information may set out conditions regarding the disclosure and distribution of such information by the heritage
resources authority.

(3) Each State department and supported body must— (a) maintain and conserve the heritage resources under its control in accordance with standards and procedures set out in regulations by SAHRA in consultation with the Department of Public Works; (b) submit annually to SAHRA a report on the maintenance and development of such resources.

**Response:** As noted in Section 10.1.3 of the draft plan, the CFRPAWHS is a natural site in terms of its unique biodiversity and outstanding ecological and biological processes. In addition the Park is subject to the NHRA.

### 23.9 Declaration of intent to gain WHS Cultural Heritage status

It is clear that TMNP’s management is alive to its responsibilities in terms of the NHRA, for section “11.1 Expenditure budget” of the Management Plan states that “significant cultural heritage resources” will have to be acquired to address cultural heritage sites. Most unfortunately however, later in the Plan it is indicated that the TMNP will not be able to fund such resources for at least five years. This further delay is most regrettable as little has been done in the 15 years of the Park’s existence, to date, to protect and maintain the fabric of the heritage sites within the Hout Bay area, resulting in their significant deterioration – the Cape climate is not kind to hastily constructed 18th century buildings. If another 5 years are allowed to pass before any preservation work on heritage sites is done, it will mean that 20 years will have elapsed before the Park addresses its outstanding legal obligation to conserve/develop/restore its cultural heritage sites, some of which could have considerable potential as tourism destinations providing benefit to the community as well as the Park.

The financial constraints under which the TMNP operates are appreciated but we submit that they do not absolve Park management of their responsibility to future generations of South Africans to prevent the destruction of their heritage. Furthermore, this admission of continuing neglect does not bode well for the success of the Park’s application to UNESCO for World Heritage status for its Cultural Heritage. (5.6.4) of the Management Plan).

The National Heritage Resources Act allows for Community Participation in sect 42 where it states that Heritage Agreements can be arranged between the owner, the relevant heritage authority and a community based conservation body. In many cases the heritage sites are on state owned land or public open space. Hence, by means of such an agreement and under a Community Banner, money could be raised to fund projects from private sources.

In general the “local lore” is in the hands of community residents and local museums. We suggest that local knowledge and expertise are vital components to produce a successful partnership between the City, Park and the Heritage Authorities in management and financial terms for all parties and that Heritage Agreements should be used to achieve these ends.

**Response:** Funding for heritage management and projects is an on-going challenge for all protected areas. However, over the past plan period TMNP did make some progress with heritage projects in securing the Tokai Manor and the upgrade of upper Tokai Road, the upgrade of Rhodes Memorial restaurant and Roundhouse restaurant and landscape. Capacity is required in TMNP to deliver on the heritage responsibilities which are currently lacking. This is acknowledged in Section 10.6.4, Human Capital Development Programme that this capacity needs to be developed.
The application referred to in Section 5.6.4 of the draft plan is to SAHRA for national heritage status for the Park in terms of the NHRA. It is not for cultural WHS status to UNESCO as stated.

Regarding the idea of partnerships with community based organisations, please see Section 10.3 of the Draft Plan with the action under the Heritage Institutional Capacity objective to “Explore partnership opportunities to assist in achieving and implementing best practises and projects in heritage management”.

23.10 **Hout Bay’s local important Heritage Sites**
The Pareto Principle mentioned earlier should also be applied to the Cultural heritage sites to ensure that they are identified and detailed plans put in place to systematically protect and restore them. Three such important heritage sites historically associated within Hout Bay and which are now included in the National Park, have significant International importance and could be developed as Heritage Tourism Destinations. It would benefit the Park and the local community as a whole if they were urgently and properly developed/restored and thereafter maintained.

**Response:** This proposal can be addressed in terms of Section 10.3 of the draft plan with the action under the Heritage Management objective to “identify, prioritise and prepare heritage conservation plans for key heritage sites”.

23.11 **Further Tourism Potential.**
The history of Hout Bay and that of the TMNP are inextricably tied. The lifeblood of the TMNP is largely tourism. Hout Bay is also largely dependent on tourism for income. It has a large unemployment problem and desperately needs to find sustainable employment opportunities related to its environment. The lack of job creation is the biggest security threat to Hout Bay’s and TMNP’s visitors, and this is rooted in poverty and uncontrolled immigration into one of Cape Town’s most attractive potential tourism destinations, located on the No 1 Tourism Artery of South Africa. Virtually all of Cape Town’s major tourist operators use Hout Bay as part of their Peninsula tours, though the potential has been severely curtailed since the remodelling of Chapman’s Peak Drive which has resulted in large buses only being able to pass North South on their way to Cape Point. This handicap is significant and needs to be understood.

**Response:** Noted

23.12 **Shared Table Mountain National Park – Hout Bay Tourism presence.**
We believe that the TMNP could gain dramatically from agreements with local tourism Information centres. Occupying 75% of the Peninsula but having very little “presence” outside the Park does not help to build a public image or increase the number of visitors to the Park. Agreements with shops and tourism outlets could benefit both the Park and the local communities. For instance, the effort needed to acquire a TMNP Wild Card is daunting. It should be possible to buy one at any number of outlets around the Peninsula. Modern on-line Point-of-Sale systems could process applications in a few minutes and suitable reliable partners could be found in each abutting community, who could provide information and brochures etc. The possibility of a Marine Gateway (9.1.3) could also be the catalyst for a
Table Mountain Park permanent presence at a point (such as Hout Bay) where large numbers of visitors arrive daily.

Response: The Wild Card is a SANParks corporate product which is being developed as primarily an online product and hence sales outlets have been reduced to one site in the Park in Tokai to serve clients without computer access.

Section 10.4 of the Draft Plan, the Products and Services Promotion objective, addresses Park promotion and marketing.

The proposal for ‘marine gateways’ will be investigated with the City who manage the key sites.

23.13 TM Forum and Ward participation.

At the time of the Park’s formation, early negotiations with the public and the then Cape Peninsula National Park, resulted in the formation of a public Forum whose committee was tasked to interface public interest with the Parks Administration. Initially it performed successfully but gradually it declined and today it is virtually non-existent. Sadly the Forum recipe was not particularly successful and for some reason it did not survive, hence the resuscitation of the Forum in its original form would probably be unwise.

However, there is a good case for the “Forum” to be revived in a slightly different form. The Park is delineated by the City’s adjacent Ward Boundaries i.e. Wards 54, 57, 62, 69, 71, 74 and 77; each having City Council representation at Subcouncil and Ward levels. We suggest that it would be beneficial to all concerned if at the Ward level a delegate to represent the area abutting the Park could be nominated by the local NGOs interested in conservation issues. The delegate would represent the relevant community interests and serve on the Forum Committee. In addition it may be sensible to include the ex-officio membership of the Subcouncil Chairmen, the Mountain Club of SA and the local chairmen of the very active and successful Neighbourhood Watch Organisations.

Response: See General Response 5.1.3.

23.14 Fire prevention and community participation.

Fires occur in Hout Bay at an alarming frequency during the summer months. They are invariably man made and caused by carelessness or delinquent juveniles. One local incident recently required the deployment of five helicopters and a spotter aircraft for +/- 5hrs, the cost of which must have been +/- R500,000 or more. One of the difficulties in fighting these fires as rapidly as possible is finding a local source of fresh water (other than sea water) so that the helicopters can quickly fill their buckets.

A comprehensive Wetland and River Plan for Hout Bay could easily accommodate an area of open water which would be easily and safely accessed by water-bombing helicopters, reducing the risk to lives and property presently posed by these summer fires. The implementation of a Hout Bay River Management Plan could be the catalyst to create an area of open water (Fire Pool). The implementation of a fire Management Plan in Hout Bay in sympathy with the Park’s Management Plan could be the answer to this matter.

Clearly, in the light of the recent large scale fires along the Table Mountain Chain, it is important that cooperation between the Park, City and the Province is finely tuned. However, there is also room for community participation in the matter and
particularly education and policing with respect to fire risks.

Response: Section 10.2.1.2, the Integrated Fire Management Programme of the Draft Plan addresses fire management in the Park. The Fire Management agreement between the Park and City co-ordinates the respective and joint activities and responsibilities in this regard. Establishing new infrastructure as a water source for aerial fire fighting within the City will need to be addressed by the City of CT.

23.15 Additional active City, Park and Community Participation.
The National Heritage Resources Act does in fact encompass Natural Heritage areas and landscapes as well as heritage sites. It also allows for Community Participation in sect 42 of the Act which states that Heritage Agreements can be arranged between the owner, the relevant heritage authority and a community based conservation body. Extract from NHRA as follows:-

“Section [42] Heritage agreements
(1) (a) SAHRA, or a provincial heritage resources authority may negotiate and agree with a provincial authority, local authority, conservation body, person, or community for the execution of a heritage agreement to provide for the conservation, improvement or presentation of a clearly defined heritage resource: Provided that the consent of the owner of such resource must be given.”

In many cases the heritage sites are on state owned land or public open space and hence by means of such agreements and under a Community Banner money can be raised to fund projects from private sources. In general the “local lore” is in the hands of community residents and local museums. Local knowledge and expertise are vital components of a successful partnership with the City, Park and the Heritage Authorities. At the moment, the law would appear to be erroneously applied to stop communities from conserving heritage sites on state owned land. If necessary, efforts must be made at a ministerial level to facilitate Heritage Agreements, failing which we will see the heritage sites in the Park slip away completely. It is unacceptable that the TMNP should defer the conservation of its heritage sites for another five years when it may or may not have the funds and resources to address them. We are already at the eleventh Hour.

Response: Noted

23.16 Chapman’s Peak Drive
The Park must be complemented on the extensive networks of laterite paths which have recently been constructed in the Tokai Forest (plantation) and Tokai Manor area. The paths are fine examples of simple facilities that can be constructed for the benefit of tourists and residents. The paths contrast strongly with the dangerous sidewalks on Chapmans Peak Drive (CPD) the reconstruction of which were promised during the redevelopment phase of work done to reopen the Pass subsequent to the great fire of 2000.

The HB Heritage Trust participated in the Environmental Monitoring Committee and the contractor/Provincial Roads Dept agreed (in writing) to construct suitable and safe side-walks from Hout Bay to the Toll Plaza. This empty promise never materialised. Chapman’s Peak Drive, in its entirety, is within the TMNP and is the first point at
which tourists and visitors (entering from the Atlantic seaboard) experience the Park. However, large numbers walk along the CPD road surface or fragmented sidewalk. This is a very dangerous situation as the road winds and frequently obscures the vision of motorists and pedestrians alike. We would urge the TMNP, City Tourism Development and the Provincial Roads Dept to fulfil this long outstanding promise the full details of which can be viewed at http://www.houtbayheritage.org.za/page95.html.

Response: This comment is noted. It must be recognised that CPD is a Provincial Main Road and the responsibility of the PGWC. The footpaths are within the road reserve and a Provincial responsibility.

23.17 Annexures

Minimal embedded comments are made within the original draft PDF files and marked “HBHT “. The principle ones relate to the neglected status of Hout Bay’s Forts which are now seriously decaying or being vandalised. We would like to discuss the matter in a joint meeting with the “Owners” of the sites the City of Cape Town and SANParks to find a solution which would ensure that the Forts are conserved and developed into “Mixed Use” Heritage Tourism destinations as per Annexure 3 Table 14. The Annexure 3 Tables 15a, b & c are mainly repetitions of the tables shown in previous iterations of the CDF plans of previous 5yr periods and are basically expanded “wish lists” with few exceptions.

More precise planning is needed and an indication of the stage at which each project has reached with guestimate target end dates. This sort of superficial project management cannot succeed. The table below from the 2001 CDF should be compared with the corresponding tables in Annexure 3 and by comparison the progress over more than 10 years can be deduced.

Response: Noted. Implementation of the Visitor Site proposals is subject to more detailed planning, regulatory approvals and available funding.

23.18 We find the stated rules regarding levies and charges for entry unacceptable at this stage without serious interactive discussion with the Park and the City, accompanied with complete financial disclosure of the previous period’s income, expenditure and reserves.

Response: SANParks has developed a Manual in terms of the Promotion of Access to Information Act (PAIA) which is available to the general public on its website and the public is encouraged to make use of PAIA mechanism to access information.

23.19 We appreciate and welcome the opportunity to work with the Table Mountain National Park to develop a successful management strategy, implementation plan and time-table acceptable to the key stakeholders.

Response: Noted

24. L Wheeler    Email: 09 May 2015

24.1 According to the advert in the Southern Suburbs Tatler about the availability of the document no mention of Observatory or Rondebosch libraries was made. This is a pity as they are close to public transport, free parking and have integrated communities of young people. What about Diep River, Retreat, Milnerton, de Noon, Table View, Parklands etc ?

Response: Noted, the selection of the 14 libraries encompassed a wide range of accessible locations.

24.2 The Newlands venue was not convenient for people who do not have private
| 24.3 | Of concern is the term “international trends” in tourism. We must keep our individuality and uniqueness so that a visit is something different and special and that “nature” is the main consideration and experience.  
*Response:* Noted. See Section 5.2, Park Mission and Vision which emphasises ‘the unique natural, historical, cultural and tourism’ aspects of the Park. |
| 24.4 | Entrance costs at Cape Point are far too high for the average South African especially when one considers the cost of transport to get there. At least one Sunday a season it should be opened free of charge to South African citizens.  
*Response:* Cape Point entrance for South Africans is free during National Parks week every year. The WILD Card and My Green Card provide very affordable access into Cape Point. |
| 24.5 | Signage concerning speed in the Park must be displayed at frequent intervals along the roads. We were most concerned to see numerous people driving fast in the Cape Point Reserve to the detriment of several tortoises. Camera operated speed traps may be useful tools as the culprits could be fined on exit.  
*Response:* The Traffic Department is responsible for enforcement on the above road. |
| 24.6 | A lot more outreach to disadvantaged communities is needed, especially for the young teenagers. Extensive collaboration with various organizations such as the Mountain Clubs, Scouts, Churches who are already involved with such groups would help spread the load and help encourage others to get involved.  
*Response:* Noted. The People and Conservation Department manage a number of Outreach programmes in TMNP. Two educational centres, an overnight trail, dedicated buses and outreach permits reach about 30,000 people per year; largely, but not restricted to youths. Additional Youth Development occurs via youth employment programs, internships and the junior rangers. The Park will explore opportunities to host existing youth development programs already active in the community. Lastly, training is integral to all Job Creation programs. This is detailed in section 10.5, Constituency Building Programme. |
| 24.7 | A Park Forum made up of citizens from various walks of life is urgently needed.  
*Response:* See General Response 5.1.3. |
| 24.8 | Strong action needs to be taken with owners whose properties border the park concerning the removal of invasive vegetation and the maintenance of firebreaks  
*Response:* Although SANParks has no legal mandate outside of National Parks the applicable legalisation is being implemented by various authorities, i.e. CoCT and DEA. The circum-peninsula firebreak is maintained annually. See Key Actions in Section 10.2.1.2 of the Revised Draft Plan. |
| 24.9 | The new closing date was not given. Why make the closing date a Saturday? Many people only have the weekend to
| 24.10 | It is a pity that there is not a summary of the document.  
Response: A summary document can be considered once the Plan has been approved. |
| 24.11 | The Glossary – Responsible tourism should also contribute in an ethical manner to local economic development and the natural environment.  
Response: Addressed in the Local Socio-Economic Development and Empowerment objective and the Responsible Tourism Product management objective in Sections 10.4 and 10.5 of the Revised Draft Plan respectively. |
| 24.12 | Fauna – a list should have been included  
Response: Species lists, for both fauna and flora are available on request from the SANParks Cape Research Centre as over 3,000 species are too cumbersome to be listed in the Park Plan. |
| 24.13 | Socio-economic context – Youth programs need to be expanded. Schools should be encouraged to give input into the plan. Workshops which could also include the communities could be held. This would help with future buy in to the Park. The department of education should be involved. The process and outcomes should be widely publicized and a fund for the youth programs should be set up. (This model could be extended into all regions for their specific Parks.)  
Response: The review for the Draft Plan is run as a public process. This issue is addressed in the Youth Development objective in Section 10.5 of the Draft PMP. |
| 24.14 | More information or a list should have been given re the 60 “recreational events”. Racing through the Park is not really conducive to the ethos of the Park. The Cycle Tour & the Two Oceans Marathon which get international attention and seem not to be that intrusive are exceptions.  
Response: The events are likely to change over the next 10 years, thus a listing would become outdated. All events are permitted and controlled as outlined in Section 10.4 |
| 24.15 | Fig. 1 The Park organogram is difficult to read especially the green writing and therefore is not very helpful. Fig.2 Likewise  
Response: Noted, see updated figures in Revised Draft Plan. |
| 24.16 | 5:6 Park key attributes –  
2 Open Access – It is not correct to say that there is no income from users of these areas as many of them are tax and or rates payers. More advertising of the Park facilities and may also encourage more financial contributions. Wild cards are not marketed extensively enough.  
Response: Correct. These areas are free of access charges. Agreed, Marketing the Parks’ Products and Services is in Section 10.4. |
| 24.17 | 4 Rich in Cultural Heritage - Is it wise and fair to grade sites?  
Response: Grading of heritage sites is required in terms of the National Heritage Resources Act. |
<table>
<thead>
<tr>
<th>24.18</th>
<th>7: Visitors facilities and activities – Table 2 Use Zone – What does LIL mean?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Response</strong>: Low Intensity Leisure.</td>
<td></td>
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<thead>
<tr>
<th>24.19</th>
<th>7.6 Administrative facilities – Table 3 – What does LIL mean?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Response</strong>: Low Intensity Leisure.</td>
<td></td>
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</table>

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<thead>
<tr>
<th>24.21</th>
<th>7.9 Community Use – What steps are being taken to control the harvesting of medicinal plants, fish etc?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Response</strong>: Addressed in the Resource Use Programme Objectives in Section 10.2.4 of the Revised Draft Plan.</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>24.22</th>
<th>9:1:3 Establish TMNP Marine Gateways – An excellent idea. There are some excellent sites which incorporate estuaries, wetlands and rivers. eg. Fish Hoek. Glencairn, Muizenberg/Lakeside etc. However, the building of more infrastructures within the Park should be strictly limited. Local communities must be consulted and partnerships developed. The Glencairn environmental group GEESE have considered a similar project and have considered raising funds to buy the Glencairn Hotel.</th>
</tr>
</thead>
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<tr>
<td><strong>Response</strong>: Noted.</td>
<td></td>
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<thead>
<tr>
<th>24.23</th>
<th>9:1:2 Cape of Good Hope Upgrade – What are the new tourism opportunities?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Response</strong>: New tourism opportunities envisaged for the Cape of Good Hope will be subject to further, more detailed investigation.</td>
<td></td>
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</table>

<table>
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<tr>
<th>24.24</th>
<th>9:1:4 Groote Schuur Estate – The Lion’s Den at the Zoo site could be converted into a theatre, a museum displaying items related to the park, a lecture theatre etc. A shuttle service like that of the University could be arranged. Could the gates then to Rhodes Memorial be kept open later. I remember as a child what a delight it was to be taken to see the City lights from there at night.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Response</strong>: Gate times are set for environmental, safety and security reasons.</td>
<td></td>
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<table>
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<tr>
<th>24.25</th>
<th>What is meant by “mosaic paths”?</th>
</tr>
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<tbody>
<tr>
<td><strong>Response</strong>: Some of the pathways in the area are made of mosaic tiles.</td>
<td></td>
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</tbody>
</table>

<table>
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<tr>
<th>24.26</th>
<th>9:2:4 Greater Newlands – This is a well-used area so please see that a good example is set by removing the invasive ivy and moth catcher vine. Some simple signage to educate people in this regard is needed. What happened to the quagga project? Could it not be reinstated in the paddocks as before? Likewise the wildebeest? Notices and secure high fencing should be enough warning to people.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Response</strong>: Wildebeest are not indigenous to the Peninsula and were moved off to make way for the re-introduction of indigenous game species. The quagga project is still ongoing.</td>
<td></td>
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</table>

<p>| 24.27 | 9:3 Communication Routes – When upgrading roads could traffic calming bumps could be put in. The speed at which people travel down the Cape Point road is totally unacceptable. |</p>
<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>24.28</td>
<td>10:2:1:3 Fauna Management Programme – Please erect more simple and clear signs on roads warning of animals eg. tortoises, leopard toads, porcupines etc crossing.</td>
<td>Traffic calming measures are included in new road upgrades.</td>
</tr>
<tr>
<td>24.29</td>
<td>10:2:2 Alien or Invasive Species Programme – Could volunteers not be used as well as paid workers? This could encourage more people to get involved with the park and their home environments and some free entries could be their payment / reward.</td>
<td>Noted and a number of these are in place. SANParks, however has no jurisdiction over City Roads and road reserves.</td>
</tr>
<tr>
<td>24.30</td>
<td>10:3:3:5 Indicators of Progress and Success etc – What is meant by “historical distribution” when referring to extra-limital species.</td>
<td>Its known distribution of a species.</td>
</tr>
<tr>
<td>24.31</td>
<td>10:3 Cultural Heritage Management – To minimize the risks and challenges bring in outside organizations whose members have special interests and expertise to help preserve and maintain the sites and if necessary run the sites and act as guides. They may also contribute finances.</td>
<td>Noted. Addressed in the Institutional Capacity objective in Section 10.3 of the Draft Plan.</td>
</tr>
<tr>
<td>24.32</td>
<td>10:4 Responsible Tourism Management – no mention is made of income for research and management of fauna and flora etc. Maybe donations could be sought for special projects from visitors using collection boxes and pamphlet appeals. Wild cards need more promotion. Lectures and guided walks would also help to bring in extra money and could help with promotion of wild cards. Holders could attend lectures, walks etc with a discount. the visitors experience unique and special. Do not over commercialize.</td>
<td>Noted.</td>
</tr>
<tr>
<td>24.33</td>
<td>10:5 Constituency Building – Some excellent ideas but do prioritize the establishment of a Park forum, development and volunteering. What are recreational working groups? The environmental experience needs to develop a wonderment, love and nurturing of “nature”.</td>
<td>See General Response 5.1.2 and 5.1.3.</td>
</tr>
<tr>
<td>24.34</td>
<td>10:6:4 Human Capital Development Programme – “Human capital” is an awful, degrading term. Could not the word “staff” be used? Training needs to be on going and multi-tasking developed particularly with the staff doing the menial work. On a visit to part of the battery / fort at Hout Bay we were most impressed by the confidence and knowledge of one of the workers not only about invasive plant control but also about the history of the area. The encounter certainly enriched our visit.</td>
<td>Noted. Staff training is addressed in Section 10.6.4.</td>
</tr>
<tr>
<td>24.35</td>
<td>10:6:5 Information Management Programme – The data could also be useful for researchers in various fields outside the parks employ.</td>
<td>Noted</td>
</tr>
</tbody>
</table>
24.36 10:6:6 Infrastructure Management Programme – The “tourism product” must be at the best possible “appropriate” standard. New infrastructure should be kept to the minimum within the Park and if possible put on the edge of the Park.


24.37 10.6.7 Safety and Security Programme – Some fauna and flora populations could also become threatened. Co-operation with private security companies and civic organizations should also be considered especially on the edges of the Park.

Response: Noted, this suggestion can be carried through to the Action for updating and reviewing the Safety and Security Plan for the Park in Section 10.6.7.

24.38 11. Costing – Introduction – Table 6
Spending over a quarter of the budget on alien and invasive species seems very high in relation to the amount spent on other nature conservation issues.

What is “habitat representation”? What does world heritage management involve and why is it a separate item?

Response: The Alien and Invasive Species programme (See Section 10.3.3.5 in the Revised Draft Plan) is a core conservation programme as alien vegetation is a major threat to biodiversity and the integrity of the Park and is a very labour intensive programme. Habitat representation ensures that a diversity of habitats are included and maintained within the Park. World Heritage Management is a separate item to ensure that the Park meets the UNESCO World Heritage Site management requirements to safeguard the integrity of the Cape Floristic Region Protected Areas World Heritage Site, see section 10.1.3 of the Revised Draft Plan.

24.39 Annexures: Please show the rivers in blue on maps.


24.40 Thank you for a comprehensive report, written and set out in an easy to read style.

Response: Noted


25.1 PMP review cycle
Some aspects of the PMP need to be reviewed frequently; particular those aspects of the plan that deal with visitors/users of the park, surrounding properties and stakeholders, such as communication, security, access and user activities.

The current review cycle of 10 years is far too long and not appropriate, and should be shortened considerably or alternatively allow for interim review and adjustment on a more frequent basis, not exceeding 3 years.

Response: As the PMP is a high level plan, the review cycle has been set by SANParks at 10 years. However the various lower level plans can be reviewed on a shorter review cycle as necessary (See figure 2).
### 25.2 Accountability to stakeholders

The very specific location of the park in a densely populated metropolitan area requires that all aspects of TMNP activities, policies and procedures that relate to or impact on the “citizens of Cape Town” (this obviously includes the local government) need to be identified and accounted for specifically. The City’s Heads of Agreement with TMNP obligates TMNP to undertake regular reviews. These have not been forthcoming annually. Furthermore, assessments of the PMP that were done, such as the recent June 2014 Assessment has not been shared with the “citizens of Cape Town”.

Nor are the shortcomings and recommendations contained in this recent assessment incorporated in the draft PMP (2015-2025).

The PMP needs to include very specific requirements with regard to performance monitoring and giving account not only to SanParks and applicable statutory requirements, but also to the “citizens of Cape Town”, openly and transparently. This obligation should be included in the PMP.

**Response:** Independent assessment reviews of the respective PMPs have been undertaken when the PMP required review i.e. in 2005 for the first (2000) PMP and in 2014 for the second (2008) PMP. The review documents were made available to the City and to stakeholders through the then Park Forum and through the stakeholder workshops of the current review.

The recommendations of the 2014 assessment of the 2008 PMP were incorporated into the current PMP, e.g. better integration of monitoring into Biodiversity Management, improving the limited heritage capacity in the Park, re-establishing a Park Forum.

Performance monitoring of the Park as a Protected Area is undertaken by DEA as part of the bi-annual METT assessment.

### 25.3 Public Consultation process

Attendance at the public information sessions held by TMNP on the PMP, as part of the public participation process, was not adequate to ensure good quality and representative input. This was partly due to poor communication and not utilizing “user information” available to TMNP to canvass public opinion. Furthermore the PMP document, as well as the information session, did not provide to the public the relevant information on the very important and essential relationship between TMNP and the City of Cape Town (which represent the “citizens of Cape Town”). This relationship needs to be fostered.

But above all, the current process which relies on the public reading and then providing written comment on a 200+ page document, some of it quite technical, can and will never provide TMNP with the true opinion, wishes and views that the “citizens of Cape Town” have and hold.

A different public participation approach is required; one that canvasses public opinion more easily and frequently. The PMP should include actions to formulate and implement such a different approach.

**Response:** The public engagement process is consistent with that used by SANParks for the review of all National Park PMPs. Although the PMP is a high-level document, it was preceded by a series of dedicated, capacity building workshops with organised stakeholders on the Desired State of the Park and the Biodiversity, Heritage, Tourism and People and Conservation high level, sub-objectives and key actions. The City was identified as a key...
stakeholder and dedicated PMP workshops and meetings were held with the City in preparing the Plan.

The placement of the PMP report on the SANParks and City’s website, hard copies in 17 libraries and the 10 public information sessions held across the city provide the means for general public input and comment to the Draft Plan.

25.4 “The park within a city”

TMNP was created through the consolidation of a large number of areas, mainly municipal land, previously administered by the City of Cape Town, South Peninsula Municipality, Cape Nature, etc with the intent of “ensuring the preservation of such biodiversity and management of the area in its entirety and in perpetuity for the benefit of all the people of the Cape Town Metropolitan Area, the country and the world”.

There is inadequate recognition in the PMP and its programmes that TMNP is unique and that it hence requires unique and different approaches in terms of public participation, communication, stakeholder management, and actual elements of the PMP.

While the PMP takes very detailed cognizance of the specific fauna and flora, it fails to apply similar diligence to the park users, and it particular the activity users.

A modified approach to engaging with the public on the planning (PMP and all other related management plans), the park management and day-to-day operational interaction is required – an approach that is different to standard schema utilized for the other national parks is required and should be pursued.

*Response:* The TMNP is managed as a national Protected Area in terms of the NEM:PAA like all other national PAs. However, the management of the TMNP and the development of the Draft Plan have been adapted to the City context. Examples of this can be found in the stakeholder workshops, Park Zoning, recreational EMPs, etc.

Regarding Recreational Users, see General Response 5.1.2

25.5 Separate stakeholder category and dedicated focus for Activity Users

Currently Activity Users and local residents (the “citizens of Cape Town”) are the largest user group that frequent the park, and are likely to grow proportionately. Yet they are grouped together with domestic and international tourists.

This has resulted in inadequate focus, and based on the feedback and comments at the recent info sessions, the communication and interaction with this group is not well managed and the cause of considerable unhappiness and friction. Part of the problem is that these interactions are managed by personnel with nature conservation skills, rather than people skills.

Here is small sample of issues that are simply not being addressed appropriately, taking the mountain biking activity as an example:

- Mountain biking is one of the fastest growing recreational activities and probably exceed hiking activities, yet the park access and facilities are still very much oriented towards the traditional walking/hiking user. The
The current activity management plan for mountain biking is more than 12 years old.
- Various passionate and sensible appeals have been made to retain some shade and replant in areas where the forest has been systematically removed. The recent official response is that to replant trees is futile as they will be destroyed by future fires anyway. Access after hours in the dedicated biking areas is prohibited after sunset.
- A number of existing and established jeep tracks in Tokai are simply not maintained anymore, with the result that they are invaded by alien vegetation and eroded, and will very shortly deteriorate to such an extent that they will become unusable for both walking and cycling.
- Plans as per the 2002 MTB EMP to create a path linking the whole peninsula have still not been implemented, and work on circular cycling loop in Cecelia, amongst others, is yet to commence.
- The income from mountain biker activity card fees is substantial yet cyclist only see an ever increasing number of prohibition signs and poorly maintained tracks. (In comparison Cape Pine, and other conservancy areas such as Bottelaray are able to provide a far more extensive and better mountain biking experience (Cape Pine permits: R 25 day permits / TMNP entrance to Tokai costs R 60).
- Despite numerous attacks on mountain bikers, the TMNP website chooses only to warn hikers and walkers of these risks.
- For well over ten years has cycling on various “prohibited” routes, both during the day and at night, been known to and tolerated by SanParks, yet when the recent clamp down started, not a word of reason or warning on the TMNP website to the cycling community – only hefty fines, ambushes, arrests and criminal records.
- The issue of the legitimacy of the Activity Card in terms of the heads of agreement with the Cape Town local authorities is not being acknowledged, openly debated and resolved, and has resulted very unpleasant confrontations, fines, ambushes by TMNP law enforcement, criminal records and the like – a very poor example of constituency building and management.

As is evident from recent consultation undertaken by the City of Cape Town, similar sentiments have been expressed by activity user codes.

To ensure that the local residents and users expectations and needs are appropriately catered for and managed, it is strongly recommended that the PMP introduces a separate and dedicated PMP Programme.

This PMP programme should contain plans to established a separate functional unit within the TMNP management structure, staffed with appropriately skilled manager and staff, and numerous plans and initiatives that will give effect to this portfolio. These plans need to include the (re-)establishment of active User forums to facilitate the interface with the various local park users.

Response: See General Response 5.1.1 and General Response 5.1.2.

The suggestion for a separate recreational functional unit within TMNP management structure is noted. However, management of the Park areas and sections follows an integrated approach with Area Managers and rangers managing conservation, tourism and recreation in an integrated manner.
It is known that there are considerable friction points and disputes between TMNP and the City of Cape Town (the official representatives of the “citizens of Cape Town”). The PMP does not acknowledge these disputes, does not identify the issues, and contains no proposals/plans to resolve these.

As an example: the reported outstanding response to City’s submission of a revised Heads of Agreement to TMNP is a case in point.

Resolution of these issues are critical to ensuring that the commitments made between SanParks and “the citizens of Cape Town” when TMNP was first established, are realized and honoured for the benefits of particularly the citizens of Cape Town. Furthermore they are critical to ensure that the interactions between TMNP and the local residents and local park users are constructive, and the park experience is positive and beneficial.

Hence plans on how and when to deal with these issues need to be contained in the PMP.

Response: SANParks agrees that it is vital to have constructive relationships with key stakeholders. SANParks has formally responded to the City’s proposal for a revised Heads of Agreement. The issue regarding the revision of the Heads of Agreement is being addressed at SANParks Executive level.

Regarding the Park Forum, See General Response 5.1.3.

25.7 Conflict between statutory requirements and the concept of a “park within a city”

Besides the issue raised in item 1.4 and 1.6 It appears that there are conflicting requirements of the various statutory legislation applicable to National Parks, including TMNP, and the requirements in the management and day-to-day operation that are needed to give effect to the reality of TMNP, as “a park within a city”.

These conflicts have manifested themselves in various ways, such as inappropriate law enforcement and fines/criminal records for minor transgressions, the prescription of the Activity fee, the inability of re-investing Activity card income into the respective activities, seemingly arbitrary user restrictions, and many more.

TMNP management often indicate that their hands are tied, and that they need to comply with this or that legislation, and hence they are not able to respond in a more flexible, accommodating and appropriate manner.

All these hinder the desired state of providing and maintaining a park “for the benefit of all the people of the Cape Town Metropolitan Area”, amongst others. A concerted effort is required to resolve all conflicting requirements. These should be identified explicitly in the PMP and its related programmes.

Response: Regarding the Activity Permit, See General Response 5.1.1, Regarding recreational users See General Response 5.1.2.

The Desired State for the TMNP, as a Protected Area within a city, is set out in Section 5 of the Draft Plan (Purpose and Vision) and was work-shopped with stakeholders as part the public engagement process.
| 25.8 | Many of the programme details (key actions and indicators) contained in the PMP are too generic and do not provide adequate information to enable meaningful comments on the planned actions and the desired outcome/deliverables. And consequently the monitoring and assessment of actual performance against the PMP is not possible.  
It is suggested that instead of the “Indicator”, that the “Desired outcome” for each PMP item is stated in the PMP, and wherever possible, that a measure of the outcome is included.  
For example provide a measure of what is to be achieved, such as “reducing the average fynbos age from 35 to 25 through planned burns”, or “increase the current capacity to fight mountain fires from 150, by 25 each year for the next ten years”.  

*Response:* SANParks has decided upon a “family look” for management plans across all parks. This is based on the guidelines for the development of a management plan, as issued by the Department of Environmental Affairs, as well as lessons learnt over the past couple of years. The indicator in the table is the directly linked to the action.

| 25.9 | Furthermore it is impossible to trace the cost of specific PMP projects and investments detailed in the PMP to the financial planning information provided. One of the reasons is presumably that the plan period is too long. Hence a further reason to provide for more frequent reviews of the plan.  

*Response:* The management plan has a 10 year horizon. This timeframe has been set by the SANParks Board. The costing of the management plan follows the guideline for developing a management plan, as issued by the Department of Environmental Affairs. Stakeholders should note that the costing cannot be interpreted as a detailed budget. The purpose of the costing is to inform the management authority and stakeholders of the financial resources required to implement the various programmes contained in section 10 of the management plan. We acknowledge that the 10 year horizon does pose a challenge.

| 25.10 | The PMP has not explicitly responded to the Findings and Recommendations identified in the (internal) Assessment of the 2008-2013 PMP undertaken in June 2014. The findings and recommendations need to be added to the PMP, as a minimum.  

*Response:* The recommendations of the 2014 assessment of the 2008 PMP were incorporated into the current PMP, e.g. better integration of monitoring into Biodiversity Management, improving the limited heritage capacity in the Park, re-establishing a Park Forum.

26. MT Crawford  
**Email: 08 May 2015**

| 26.1 | I don’t recall seeing anything in the document about the use of the mountain for education, specifically school children’s nature education. As a child I recall school outings in Silvermine. My children were taken on schools outings to several of the points currently in the Park, among them the facilities in the Cape Point Nature Reserve overnighting in the huts on the north side of Da Gama Peak.  

*Response:* The Park’s Environmental Education Programme is outlined in Section 2.12.11, Socio-economic Context and Section 10.5 Constituency Building programme which covers the scope of the programme and the facilities available.

| 26.2 | 4.1.2 - one of the traditional uses of the Rhodes Memorial site for Cape Town residents is for post wedding photos - not mentioned in the document (My son even got married there!)
<table>
<thead>
<tr>
<th>26.3</th>
<th>Under Visitor Site Proposals - Rhodes Memorial does not seem to be mentioned. We hope this site will be kept as is - a free access point to Table Mountain!</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Response:</strong> Rhodes Memorial has been identified as a mixed use visitor site in Table 24a.</td>
<td></td>
</tr>
<tr>
<td>26.4</td>
<td>Nothing re security on the mountain? Shouldn't this come into the plan especially with the occasional incidents which we have seen reported periodically. These seem to fluctuate in number in certain years.</td>
</tr>
<tr>
<td><strong>Response:</strong> Section 10.6.7 for the details of the Safety and Security programme.</td>
<td></td>
</tr>
<tr>
<td>26.5</td>
<td>Postal Services is seen as &quot;Not Appropriate&quot; under Products &amp; Services. However, as a stamp and postmark collector I am aware that there have been special post boxes at both the top of Table Mountain and Cape Point (and Kirstenbosch), where visitors, may post cards or envelopes and which then receive a special postmark commemorating their visit to these sites. At one stage one also used to be able to buy postage stamps at these venues. I hope these facilities will remain!</td>
</tr>
<tr>
<td><strong>Response:</strong> The postmark and stamp service has been suspended by the South African Postal Service. One can post a letter at both Cape Point and Table Mountain via the facilities offered by the concessionaire, but the letters is posted from the closest local post office.</td>
<td></td>
</tr>
<tr>
<td>26.6</td>
<td>Annexure 5 - 25/26/49 - I see ROAD bike riding is prohibited in the Cape Point National Park. I also remember seeing an announcement re this a year or so ago in the press. My wife &amp; I used to, once or twice a year, enjoy riding by road bike into the park. We rode right down to the point parking area as well as doing the circular route. If motorbikes are allowed on the roads in the park I see absolutely no reason why bicycles which are much more eco-friendly (which the Park management claims to promote), are not now allowed!</td>
</tr>
<tr>
<td><strong>Response:</strong> Cycling in the Park is permitted in terms of the recreational EMP which designates the routes and areas open to cycling.</td>
<td></td>
</tr>
<tr>
<td>26.7</td>
<td>A while ago the cycling fraternity in Cape Town (supported by the Pedal Power Association and other MTB associations) were hoping for a route on the mountain which would enable cyclists to cycle from the city bowl, via MTB paths along the front of Table Mountain, Devils Peak, the side Table above Newlands and Constantia Nek, through to Tokai - and maybe even beyond. This would be an amazing facility for both local cyclists and tourists. Can this please be put in the plan as a goal, even if long-term?</td>
</tr>
<tr>
<td><strong>Response:</strong> The revision and establishment of new recreational routes is undertaken in the revision of the EMP for the activity. Section 9.2.4 notes that the suitability of linking recreational activities between Constantia Nek and Rhodes Memorial needs to be investigated.</td>
<td></td>
</tr>
<tr>
<td>26.8</td>
<td>I'd like to state that I don't support anything which would increase the number of</td>
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“formal entry points” to Table Mountain at the expense of the “minor” or “local” entry points. Ratepayers of Cape Town have traditionally had local entry points onto the mountain to hike or walk dogs and the number of these should never be reduced. (I don’t see anything in the document proposing this, but I would like to put this on record!)

Response: Park Entry Points, including pay points are dealt with in Section 4.1.4 of Annexure 3 (Park Zoning and CDF). The introduction of any new pay points will be subject to the relevant approval procedures.

27. Far South Peninsula Community Forum (FSPCF) Letter: 08 May 2015

27.1 We endorse the submission made by the Hout Bay and Llandudno Heritage Trust. They share much in the way of common experience, knowledge of and concern for the part of physical Cape Town managed by SANParks and often reference to Hout Bay could be replaced accurately by the Far South Peninsula

Response: Noted

27.2 The management plan is generally well written and intended

Response: Noted

27.3 Regular block burning is necessary for the propagation of fynbos and to avoid extensive fires such as that in March 2015. The request of ignorant local residents to avoid prescribed burns must be countered as proposed.

Response: Noted. Addressed in the Key Actions in Sections 10.2.1.2 of the Revised Draft Plan

27.4 In agreement with a 2 year cycle of alien removal.

Response: Noted.

27.5 As stated one of the potential risks to tourism is crime on the mountain. In addition to more frequent and visible patrols we endorse educational initiatives to inculcate a broad and inclusive appreciation of these huge open spaces we are so privileged to live close to and to foster the realization that in addition to health and recreational benefits the area represents a very significant part of our economy.

Response: Noted. Addressed in the Key Actions in Sections 10.6.7 of the Draft PMP

27.6 Assistance can be given in providing and coordinating customer feedback.

Response: Noted.

27.7 With reference to the newly acquired (properties on the) Roodeberg mountain range:

- Vagrants sleeping on the mountain is a serious issue. Regular sweeps of the mountain should be done to ensure that this activity is minimised.
- Fire breaks. SANParks should monitor the properties which abut them to ensure that these properties are clear of alien vegetation and also have a fire break. Some Capri and De Oude Weg properties are examples.
- More private land owner agreements with a view to protection of buffer zones should be encouraged.
- Civil society’s assistance in protecting our natural heritage should not be inhibited by red tape.

Response: Noted and the relevant operational managers have been informed and follow-up operations are in place.

27.8 While sensitive upgrading of the picnic site at Silvermine dam and the use of Groot
Silvermine Homestead as a visitor centre are supported, focus on such areas should not be at the expense of other areas like Peers cave which suffers from vandalism and needs better protection.

*Response:* Noted.

27.9 What is allowed to happen on World Heritage Site buffer properties holds a significant threat for the future of the World Heritage Site. These numerous properties are in integral part of the Peninsula’s remaining natural environment, also the globally significant conservation area and should enjoy special levels of planning protection as envisaged in the World Heritage Convention Act. SANParks is often called on to be an interested and affected party in rezoning and sub-divisional applications and should use its influence and mandate to oppose any tendency to undermine the conservation of such national natural state assets. In this regard we support the purpose of the Department of Environmental Affairs to develop an Environmental Management Framework for the whole of the Cape Floristic Region.

*Response:* Noted.

27.10 A fully functional joint forum of shared ownership is needed to deal with issues of common interest such as private landowners’ responsibilities, ecological corridors, combatting poaching, dog walking and the effective management of extended public works projects (EPWP) like Coastcare. This would facilitate better communication, higher levels of trust and increased collaborative action in caring for our mountains and reducing thoughtless human impacts. We trust that some of these and comments from other civic bodies will be taken into consideration before the plan is finalized.

*Response:* See General Response 5.1.3.

27.11 Baboons are mentioned only once in the plan. We feel that such a charismatic species, so identifiable with the southern peninsula experience, deserves more attention. The current “management” approach is unambiguously anthropogenic with the culling option often being preferred.

*Response:* The plan deals with species holistically and not on an individual level. Addressed in the Key Actions in Section 10.2.1.3 of the Revised Draft Plan.

27.12 There is some attempt to explain the fee structure and how funds are distributed nationally. However the complaint that we often hear is that entry tariffs are prohibitively expensive and even with the green card system end up being elitist and exclusive. It is not in the interests of the park’s integrity for the “free”, no fence entry options becoming the default points of access because of affordability issues.

*Response:* Noted. Addressed in the Key Actions in Product and Services Promotion objective and the Equitable Access objective in Section 10.4 of the Revised Draft PMP.

27.13 The activity card system for dog walking needs to be overhauled so that more than one person can walk the same animal at different times.

*Response:* See General Response 5.1.1
27.14 Thank you for the opportunity to comment and we trust that there will be more frequent dialogue between the SANParks management and representatives of the many thousands of Far South residents who value the mountain chain.

Response: Noted.

28. Table Mountain Bikers Letter: 08 May 2015

28.1 2.12.10 Tourism, page 18

What the Management Plan says:
“development, while addressing the high demand for making the Park accessible to residents to accommodate a wide variety of lifestyle-based outdoor and recreational activities.” …” the overall trend seems to indicate that the vast majority of visitors to the Park are local residents,”

Comment: The Management Plan does not differentiate between “local” recreational users and “out of town” visitors. Both groups have different expectations and use the Park in a different way.

Suggestion: Create a separate user category for residents of Cape Town that make use of the Park on a frequent and regular basis. Local residents can’t be classified as tourists. They have different requirements and place different demands on the Park. Resources are prioritised for tourist destinations within the Park it seems. Tourists come into the Park, make use of the facilities and leave. Any residual issues or damage are not for the “account” of the tourist. The local residents, if they participate in an activity within the Park, are required to comply with guidelines, such as compiling an Environmental Management Plan (EMP) for their respective activities, may be confined to certain areas within the park and are subject to the carrying of a permit and associated controls. To call these Park users “tourists” is not correct.

Response: See General Response 5.1.2

28.2 2.12.10 Tourism, page 18/19

What the Management Plan says:
“Recreational users currently engage in activities on a regular basis such as walking, hiking, walkers accompanied by dogs, mountain-biking, trail running, horse-riding, mountain climbing, etc. Due to this large number of users (more than 1.5 million) there is significant investment required for developing and maintaining footpaths, access points, parking areas and infrastructure.

Comment: Locals are the largest visitor group to the Park and when engaging in activities such as mentioned above, are levied a fee in form of the Activity Permit.

Suggestion: If a fee is levied and the Plan suggests that a “significant investment” is required, the permit fees should be used for the tasks outlined above. This should be expanded on in the Management Plan. How much of the permit fees, levied from recreational users engaging in an activity, is invested in maintenance? What are the amounts raised through activity permits? Why are these not shown in the budget?

Response: See General Response 5.1.1

28.3 Section 5: Page 30

What the Management Plan says:
2. Open Access. Negative: No income from users of open access areas

Comment: This is not a correct statement.

Suggestion: Activity Permit holder pay to use open access areas. I would like to stress this point as the Park is generating income from permit holders in all areas where they are allowed to perform the activity.
Response: Correct. These areas are free of access charges. See General Response 5.1.1

28.4 What the Management Plan says:
10. Varied Recreational usage. Negative: Conflict between user groups

Comment: The traditional user groups that enjoy unfettered access to the mountain can’t expect to enjoy this type of access in perpetuity, to the detriment of other, growing user groups. If the Management Plan is revised so that it is relevant to the current times, then it must also be recognised that a user group like the cyclists are growing in numbers, yet being restricted to tiny areas where the concentration of such numbers is having an impact on the environment. Not because cycling damages the environment more than any other recreational activity (this has not be scientifically proven beyond a reasonable doubt), but due to the fact that other user groups seemingly have the clout to prevent cyclists from accessing and sharing other areas in the Park. Based on the Park Zones (as laid out in Section 6 of the Plan), there is significantly more recreational space available to cyclists than is currently open for cycling. If the Zone mentions cycling as an acceptable activity within that Zone, why is not being considered? A Mountain Bike EMP has been in place and ratified by Parks Management, since 2002 and the current Park Management Plan has recognised cycling as an activity and has specifically mentioned it as acceptable in almost all of the Park Zones. Cyclists have fulfilled the Park’s requirement, yet cyclists have not been able to access other areas in the Park. This has to be addressed and access made easier.

Response: Noted. Areas and routes are designated through EMP’s for the various recreational activities and are reconsidered as the EMP’s are reviewed.

28.5 What the Management Plan says:
Section 8: Park Consolidation

General Comment & Question relating to the Activity Permit

The Activity Permit is enforced throughout the Park. There are areas within the Park where it is not clear whether a permit is required or not. I specifically refer to the mountain biking activity. On the trails above the City Bowl, no reference is made on official signage that an activity permit or a day permit is required for cycling. At no access point does the signage indicate this. The pictograms show cycling as a legal activity in the area.

This creates confusion amongst visitors that are not familiar with the activity permit system. They are not able to purchase a day permit anywhere in the City Bowl. The San Parks website does not refer to Table Mountain MTB Trails when it mentions where Activity permits for cycling are required.

Not all of the land within the Park belongs to San Parks. Is the activity permit enforceable on all land or only on land actually belonging to San Parks? This is not made clear anywhere in the Management Plan.

The status of the activity permit system is also not addressed anywhere in the
Management Plan. We do not have any information about how much money is raised though the permit system. We have no indication of where the money is being spent. The activity permit is a levy raised from recreational users within the boundaries of Table Mountain National Park, yet the funds are not directly re-invested in the Park.

This is a shortcoming in the permit system and needs to be addressed. If the activity permit is unique to this this park only, then it needs to included in detail in the Management Plan as it is a tool used to “manage” certain activities within the Park.

Response: See General Response 5.1.1

28.6 Section 9. Development nodes

Comment: Mountain Biking should be recognised when looking at development nodes. A number of activities (non-permitted) are mentioned, but not cycling. Mountain Biking should form an integral part of further development as it is a recreational activity that is growing in leaps and bounds and has significant tourism potential.

Response: Agreed.

28.7 Communication:

It should be specifically mentioned in the Management Plan that SANParks has to communicate effectively, timeously and in detail with its user groups. As locals living on the Park boundaries and making use of this resource, we currently feel like we are taken for granted and not respected by SANParks. Communication around crime is slow, lacking detail. As an active user group, cyclists have established efficient communications networks, mainly via social media, but also through newsletters and group messaging systems. We pick up information virtually in real time and share it amongst the community we serve to keep them informed. We have offered our channels of communication to Park Management, but the offer is not being taken up. We communicate responsibly and non-sensationalist. We put out the facts as and when we receive them. Sometimes time is of the essence to catch criminals. We feel that San Parks need to include a section in the Management Plan that makes a commitment of effective communication with the users of the Park. We feel this is owed to us.

Response: See General Response 5.1.4

29. CityROCK Indoor Climbing Email: 09 May 2015

29.1 This is an interesting document, very high-level, too high-level. There is very little wrong with the overall strategy for TMNP. However, this document is lacking in daily operational management details such as policing, law enforcement, revenue collection from different users, user management in general.

Response: Operational detail can be found in the various Lower Level Plans as indicated in the Revised Draft Plan.

29.2 Responsible Tourism sections (page 38 and page 89 onwards), and Effective Park Management (pages 41 and 98 onwards).

On page 93 of the Plan it states: "In order to implement Responsible Tourism and achieve the strategic
development of the Park, the following tourism objectives have been identified. A detailed lower level plan will be developed to guide this programme.”

My organisation would very much like to part of the consultation process of this plan.

Response: The review of the Responsible Tourism lower level plan will be open for stakeholder input.

29.3 Distorted and Unfair Revenue Collection
The park is trying to extort money from various easy target user groups. Wild Cards, Green Cards, etc. It seems that the park is really going after easy prey. Climbers and bikers mostly. The ones that easily stand out. Why don’t hikers pay a usage fee? Why don’t the millions of Cable Car visitors pay a usage fee? Maybe they already do, just charge them another R5 extra, which will be a tiny increase for them? Or charge the cars that drive to Signal Hill an entrance fee? Hikers going up Lions Head? As opposed to charging the active Cape Town users serious money. The rationale often given is that cyclists, are users that need to be managed. The Park puts ZERO money back into the sports that it collects revenue from. This is not very equitable and in fact discriminatory. Remember the saying “No taxation without representation.” That is exactly what TMNP management does with many user groups.

Response: See Table 6 in Section 11 for reinvestment of funds into the Park.

29.4 Policing is fairly useless.
The actual law enforcement officials are despondent, often seriously overweight, and unable to catch anyone. They sit on the shadows under trees. When incidents are reported, TMNP rarely responds, or not at all. Crime hotspots are not the parking lots, but remote areas.

Reports of poaching are totally ignored. Often one sees four rangers walking or driving around together, as opposed to best practices of individual or two people, doubling or quadrupling the visibility of law enforcement.

In the Higgovale Quarry, climbers are regularly harassed by Law Enforcement officials. “It's a drug dealers hotspot, the neighbours complain, bladibla”. Climbing is 100% legal in the quarry, the law enforcement officials should enlist the cooperation of climbers, make them their eyes and ears, instead of harassing them.

Yet park policing finds the resources to harass innocent cyclists or climbers, asking for permits, or threatening them with arrest when practicing their sport. TMNP should work cooperatively with law-abiding user groups in making the park safer, not harass them or try to extract revenue from them.

SandyBay, a regular crime hotspot, is rarely patrolled. TMNP law enforcement does not cooperate with the Llandudno residents, Hout Bay Neighbourhood Watch, ADT Security. A holistic approach would go a lot further.

Response: The law enforcement strategy has been reviewed, patrols regularly
changed to focus on hotspots. Rangers have received dog training skills to improve their crime fighting initiatives. Technology will be used to enhance enforcement activities. Close working relationships with other law enforcement agencies for cooperative crime fighting operations and responses. See the Actions in the Safety and Security programme in Section 10.6.7.

29.5 P20: "Two mega-sport events in the City..."
The park engages with the Cycletour and the 2 Oceans? That engagement is not very constructive. These 2 events are held entirely on tar roads that are not managed by the park. Last time I heard that TMNP management were unhappy about the Cycletour and its impact on road closures, being rather uncooperative, selfish and rather myopic in its attitude towards Cape Town’s biggest tourist event.

After the recent fires, almost all the rock climbing areas are now closed. A lot of these areas were not affected by the fires, yet TMNP management issued a blanket closure decision. There was no consultation with climbers. There is no communication with user groups whatsoever. Climbers arrive at a crag to find the areas cordoned off, and are threatened with arrest for trespassing.

Response: Noted. The appropriate operational managers have been informed and regular follow-up actions are in place.

29.6 P88: MPA: Reports of poaching in the MPA are totally ignored by TMNP.

Response: Noted. The appropriate operational managers have been informed and regular follow-up actions are in place.

29.7 Human capital development programme. The park has this as a stated objective. Pages 38 and 102. TMNP employs some top rate individuals. But sadly in my interaction with TMNP staff, many people working for TMNP require a lot of development. From the Park Manager that is often out of touch with reality, to the Park spokesperson that loves spin-doctoring and is hostile towards the media, to the hugely overweight rangers that couldn’t catch a fly - human capital at TMNP requires a lot more attention.

Response: Noted. The Park continues to undertake on-going staff improvement programmes.

30. South African Association of Stills Producers (SAASP) Email: 11 May 2015

30.1 The relationship between our members and the park has been strained of late as the perception amongst our members exists that the park will do everything in its power to rather decline an application than approve it.

We have been told outright that the park prefers dealing with events rather than film shoots because the events often sponsor goods in addition to the location fee. We realize that it is National policy that all funds generated go into a communal budget and as such the section rangers would never see the benefit of allowing a film shoot because the location fee is not allocated directly to that section. The fees we pay however are not insignificant – up to R20 000 per shoot day. This has meant that section rangers only see us a potential liability rather than an asset.

Response: See response 30.4

30.2 We have asked the park management on several occasions for the site specific regulations for each of the sites under the park’s control pertaining to filming and this has not been provided to us. We are aware that the ECO companies charged
with managing us have these site specific regulations but have been told they may not distribute them to our industry. This has resulted in our members not being aware of what is and what is not allowed at each location and often they then apply for something not allowed and are told too late that their application has been denied. We also get the impression that these regulations are being withheld from us specifically for the purpose of section rangers being then able to change the goalposts mid stream should they feel like doing so.

Response: See response 30.4

30.3

The management plan speaks to events and film as an asset and recognizes us as stakeholders but unfortunately in practice this is not the case. The staff at the permitting office (only one permitting officer for the whole country) is less than competent, often rude and obstructive. We have had several attempts over the years at constructively engaging with the park but we are only met by the hospitality manager who basically just tells us this is how it is, deal with it. Any attempts to engage with senior management have been met with silence.

Response: See response 30.4

30.4

Our industry really wish to have a better working relationship with SANParks, we have the opportunity to expose your park to the world through the various formats in which we work. Unfortunately we continue to be seen as an irritation and a liability and we request constructive engagement at senior management level to build on this relationship.

Response: The demand for Film and Events to have a platform in the Park has grown substantially over the last five years. How SANParks engages with both film and events is however seen through the same lens, that of conservation. The platform provided is within the parameters of a National Park which is managed in terms of the mandate based on conservation and the preservation of the Park’s world renowned biodiversity. This in turn is informed by the relevant legislation.

A number of requests have to be turned down because by authorising these requests SANParks would be in direct conflict with its own mandate. There is a growing appreciation from both sectors of this concept and SANParks commends everyone involved for getting the message out there about the privilege of filming in a national park.

SANParks has internal parameters which are used as decision making tools to guide the TMNP permit office on what is permissible and what not. These guideless are regularly updated based on learning’s as to what works in the scope of the Park and where there could be more flexibility. All applicants who are unsure of location conditions are welcome to contact the permit office (telephonically or via email) prior to completing their application form to ensure that they don’t apply for a site or location that would not be authorised. The permit office would then be able to guide an applicant as to how to submit an application that has a substantial chance of success upon submission. The opinion that filming is an inconvenience is inaccurate and would be better stated as filming is an additional revenue stream which needs to happen within the overall conservation mandate of the SANParks.

The decision making around permit approval is not linked to the allocation of
revenue to section rangers cost centres. All revenue earned in TMNP is redirected at year end to Head Office and used for the operational budget of all 21 national parks. SANParks welcomes all revenue streams coming into the park and those wishing to engage, including the filming community. SANParks does receive donations from a variety of sources and some of these are from event organisers who may repair a section of boardwalk or repair a footpath through the honorary ranger programme. These donations made via the Honorary Ranger programme are reported in our financials in line with the Public Finance Management Act and properly documented. They do not influence any decision making processes and are largely a reflection that many event organisers wish to reinvest in the Park especially around the section of Park that event utilises as the event is annually repeated occurrence.
SANParks welcomes the submission of new filming proposals but can’t accommodate all of them for a variety of reasons: these would vary and could be as simple as the site is already reserved on the day, to the special effects are not suitable, to the environment or the location is environmentally sensitive and can’t be considered or the crane is not suited to the habitat it is proposed to be operated in. All SANParks decisions are framed by what is in the best interests of the environment.

The TMNP permit office does cover the whole country however The Kruger National Park has its own permit department. Due consideration is to be given to the fact that the film industry is always looking for the shot to make each specific project special and by the very nature of this premise it would mean pushing the boundaries which in turn can result in conflict when applications are denied. The permit office operates in the best interests of the Park and hence the permitting rules are not as flexible as the industry may desire.

Relationship building is a vital cog in the operation of a Park so closely located to a city. The TMNP park forum is being reinstated and a voice in this forum will offer an opportunity to make recommendations and air opinions in a constructive environment.

### 31. Tokai District Riding Association (TDRA) Email: 11 May 2015

<table>
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<tr>
<th>31.1</th>
<th>The TDRA has a proven track record of working proactively with SANParks to help manage the bridle paths and trails that are used by horse riders. We have also forged good relationships with other user groups and stakeholders such as the Province and Cape Town City Council who have partnered with us in repairing trails and paths on the Green Belts.</th>
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<td><strong>Response:</strong> Noted</td>
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| 31.2 | The purpose of the Park (Section 5) is, “To ensure the development of a prosperous, healthy, culturally rich and scenically attractive Cape Peninsula for the benefit of all residents and visitors and the optimal use of the area’s unique set of natural and cultural resources...” (Fuggle Report, 1994) Horses and horse riding has existed in Tokai for decades. Many of our existing riders grew up in Tokai and remember the flower farms and dairy farms that made up the area. Horse riders are invested in ensuring the ongoing equestrian use of the Tokai Park. It also makes good economic sense to keep riders in the area. Research commissioned by the TDRA and conducted by a forensic auditor in 2012, estimated that riders in the area generate over R8 million per annum. This includes service providers such as feed merchants, vets, farriers, manure |
collectors and other equine health professionals. We submit that the equestrian community based on the borders of the Park should continue to benefit from the use of the Park to the greatest extent possible within the parameters of environmental sustainability. Restricting existing and possible future rights to use the Park should not be done lightly and only after extensive consultation with TDRA and other equestrian stakeholders.

*Response:* SANParks is not aware of any such rights that equestrian users have in TMNP.

| 31.3 | Comment on section 5.6 / point 10 refers to conflict between user groups. The TDRA has worked hard to foster good relations between different user groups. We were scheduled to hold a joint bike rider/equestrian event in late March but this was postponed after the devastating fires which have had such a huge impact on the area. Managing user conflict is top of the TDRA’s agenda and key to this is the establishment of clearly demarcated trails for separate users. In the past, riders had areas that were strictly off-limits to mountain bikers but with the increased number of cyclists in the area, these areas have become blurred - and this is often where conflict arises. To this end the TDRA insists that all members have activity permits and we ask that our members abide by the rules of the Park – which means riding only in areas designated for horses. Compliance is not always easy to achieve when it is clear that other user groups are flouting the rules, without any repercussions.

TDRA has shown commitment over the years to working with SANParks to map horse trails and maintain the trails that we use in order to reduce environment impact. We believe that more could be done by authorities to better manage trail usage in order to help reduce user group misunderstandings and conflict. One area where there can be much improvement is the provision of adequate and robust signage that can’t easily be removed by other user groups with their own agendas for how access in the Park should be provided.

*Response:* Noted. This will be addressed in Tokai by the track rationalisation planning process (Section 9.1.5). This issue is also addressed in Section 6: Zoning and Annexure 3: Park Zoning and CDF indicates zones for recreational use as well as in the Key Actions in Section 10.4 in the Draft PMP. Annexure 3: Park Zoning and CDF indicates zones for recreational use.

| 31.4 | Section 5.6 / point 11 deals with economic drivers. It must be noted that the equestrian community in Tokai is a powerful economic force. Riders generate over R8 million per annum. Our contribution has been noted above, but it must be stated that we provide employment and also influence property values in the area which has a direct impact on the rates collected by the City of Cape Town.

*Response:* Noted.

| 31.5 | Section 5.6 / point 12 looks at the wide stakeholder base and sense of ownership. Equestrian use predates the National Park by decades and many riders have lived and ridden in Tokai for generations. We are deeply invested in remaining active stakeholders in the Park and are actively participate in supporting SANParks in their endeavours to manage the area.
31.6 **Comment on section 6 (Park Zoning)**
The TDRA submits that riding is an ‘outdoor natural’, low-intensity leisure activity but that has a major advantage to eco-tourism in that riders do not require visitor facilities or extensive built infrastructure to carry out their activities. Being outdoors enthusiasts, riders also have a vested interest in ensuring that the Park remains a valuable resource for outdoors activities and is protected from being affected by the ever-pressing demands from developers to encroach on available open space.

An extensive network of bridle trails that are maintained by TDRA together with SANParks would drastically reduce any potential impact to the Park. Trails do ideally need to be interconnected and clearly sign posted to reduce user group conflict and help prevent people riding off trail. Riders can positively contribute to the safety of the Park as we are able to cover greater distances and have a better vantage point than walkers and cyclists.

The TDRA supports the use zones and the inclusion of horse-riding in all by the Remote Core areas. To ensure the ongoing inclusion of horse riding, we would like to see greater linkages between riding areas and increased access control.

It must also be stated that many riders are also cyclists and dog walkers in the area, so the commitment to the ongoing management of the Park is deeply ingrained in TDRA members on a number of different levels.

**Response:** Noted.

31.7 **Section 9.1.5 the Tokai Manor Precinct upgrade.** The TDRA supports the upgrading and development in this area. We urge more rapid progress on the development of the arena, as this will consolidate equestrian usage. TDRA is dedicated to the ensuring that any equestrian node is accessible to the wider community on an inclusive basis and managed in the spirit of an NGO.

**Response:** Noted.

31.8 **The rationalising of existing tracks (Section 9.2.7) should not limit the trails available to horse riders. Short routes that are not linked are not viable for horse riders.**

**Response:** Noted. This will be addressed in Tokai by the track rationalisation planning process.

### 32. Kommetjie Heritage Society  
**Email: 11 May 2015**

32.1 **Management of property in the Cape Peninsula Protected Natural Environment (CPPNE) and Buffer Zone of the Cape Floral Region Protected Areas World Heritage Site (CFRPAWHS).**

We are very concerned that properties which fall outside of the area of the TMNP but within the CPPNE and/or proclaimed Buffer Zone of the Table Mountain portion of the CFRPAWHS, are not covered by any Management Plan, including the current Management Plan of the TMNP.

**Response:** Noted.

32.2 **We have been consistently informed by officials of the TMNP that they have no jurisdiction over properties outside the TMNP. This is despite the fact that much of the property falling into the buffer zone of the TMNP is protected either by being proclaimed part of the buffer zone of the CFRPAWHS (and hence protected by the**
World Heritage Convention Act) and/or forms part of the CPPNE (and is hence protected by NEMPAA). This is contrary to the proposal made by the National Parks Board in 1995 to manage the whole Cape Peninsula Protected Area (CPPA).

Response: SANParks only has the legal mandate to manage properties declared or managed (in terms of a formal agreement with the owner) as part of the TMNP whether these are in the designated WHS core or buffer zones. However, SANParks has no jurisdiction over other properties in the WHS buffer zone.

32.3 The recent fires in the TMNP have demonstrated how the lack of a management plan to deal with properties in the buffer zone of TMNP can compromise the best of management plans for the TMNP.

Response: Noted. Therefore the need to formally consolidate these properties into the TMNP as set out in the land consolidation strategy.

32.4 Management History of the CPPNE, CPPA and TMNP

Before the proclamation of the Cape Peninsula National Park, various authorities and bodies were responsible for the management of the 3 proclaimed nature reserves (Table Mountain, Silvermine and Cape Peninsula). In addition to these nature reserves, a Management and Advisory Committee (MAC) existed to manage all land within the greater CPPNE, which incorporated conservation worthy public and private land on the Cape Peninsula.

In June 1995, the Table Mountain and Peninsula Advisory Committee was established by the Minister to:

“To advise and make recommendations on the appropriate legal Framework to create a single statutory Cape Peninsula Authority for the Future management of the Cape Peninsula Protected Natural Environment and/or to advise on any other structure for such management”

This Committee recommended the creation of a single Authority to control the all properties within the CPPNE; and that the CPPNE at the time should be considered to be the minimum area for the total conservation area which they termed the Cape Peninsula Protected Area (CPPA).

In September 1995, the National Parks Board submitted a proposal to the above Table Mountain Advisory Committee to become the single statutory authority to manage the total CPPA.

This proposal accepted the management by the National Parks Board of the total CPPA, including the complexities of including public and private land; it also accepted that the then boundaries of the CPPNE would form the minimum boundary for the CPPA.

Regarding the question of land use planning within the CPPA, the proposal undertook to “develop mechanisms to draw up and implement a land-use planning framework driven by conservation motives”. In conclusion, the National Parks Board’s proposal stated the following: “It is proposed that through a process in which stakeholders and public alike can participate, a national park be established on the public and private land and sea of the Cape Peninsula where protection of natural features and recreational public use are dominant factors.”
The CPPNE MAC was therefore disbanded in June 1996, which paved the way for the development of the Cape Peninsula National Park under the management of the National Parks Board.

**Response:** The comment and concern is noted. The mechanism to manage other land in the CPPNE is through the TMNP Land Consolidation Strategy (see section 8 of the draft PMP) which guides the incorporation of properties into the Park. To date the Park is 84% consolidated. The outstanding 16% comprises State, municipal and private land. As properties are consolidated in the Park, they are brought under the dedicated management and protection of the national park.

32.5 **Legal Status supporting the Environmental protection of properties in the CPPNE and/or Buffer Zone of the CFRPAWHS**

Properties in any World Heritage Site, including its buffer zone should be managed in terms of an Integrated Management Plan. This requirement is set out in Chapter IV of the World Heritage Convention Act, 1999. In addition para 103 – 107 of the UNESCO Operational Guidelines for the Implementation of the World Heritage Convention describes the required management of buffer zones to proclaimed World Heritage Sites. Para 104 of the Operational Guidelines states the following:

“For the purposes of effective protection of the nominated property, a buffer zone is an area surrounding the nominated property which has complementary legal and/or customary restrictions placed on its use and development to give an added layer of protection to the property.”

Properties included in the CPPNE are protected in terms of the National Environmental Management Protected Areas (NEMPAA) Act. In 1989, all nature areas which had been declared in terms of the 1967 Physical Planning Act were declared as Protected Natural Environments in terms of the Environmental Conservation Act, (Act No 73 of 1989). The Cape Peninsula Nature Area accordingly became the CPPNE. In 2003, the NEMPAA Act was promulgated. Section 28(7) of this Act states:

"An area which was a protected environment immediately before this section took effect must for purposes of this section be regarded as having been declared as such in terms of this section." It therefore follows that the whole of the CPPNE, and not just the TMNP is fully protected as a Protected Area in terms of NEMPAA.

Properties protected by NEMPAA are excluded from the City of Cape Town Zoning Scheme. The City of Cape Town zoning scheme regulations state the following:

As from the commencement date as published in the Provincial Gazette, these zoning scheme regulations apply to all the land under the jurisdiction of the City of Cape Town, including land lawfully assigned to or reclaimed by the City of Cape Town. These zoning scheme regulations do not apply to protected areas where all aspects of the management of the protected area and activities within it are regulated by:

a) the provisions of the National Environmental Management: Protected Areas Act, 2003 (Act 57 of 2003); and/or
b) the National Environmental Management Biodiversity Act, 2004 (Act 10 of 2004);
c) regulations under these Acts; and
d) approved management plans implemented by the management authority in such areas, which areas are specifically indicated on the approved zoning map.

The implication of the above is that no property which is protected by NEMPAA can be rezoned or considered in the City Zoning Scheme for zoning. This should include all properties in the CPPNE.

Development of properties in the World Heritage Site are defined as Core in terms of the City of Cape Town Spatial Development Framework as well as the Southern District Plan. The Southern District Plan which is published in line with the City of Cape Town Spatial Development Framework provides the designation “Core 1” to all properties in the TMNP as well as Buffer Areas in the World Heritage Site. The District Development Guidelines for all properties in Core 1 includes the following description:

5. Further subdivision of these areas should generally be discouraged and consolidation encouraged.

7. New development inside of the urban edge that potentially impacts on areas of high biodiversity importance should only be considered under exceptional circumstances or where social and economic imperatives merit consideration of development in parts. Such development should then be sensitive to biodiversity considerations affecting these areas.

Strategy on Buffer Zones for National Parks. This document was recently published to specifically provide additional protection in the buffer zones immediately surrounding National Parks and Protected Areas. Page 2 of the Strategy states the purpose of a buffer zone is to “Protect important areas of high value for biodiversity and/or to society where these extend beyond the boundary of the Protected Area”.

Promulgation of the CFRPAWHS in the Government Gazette. Government Gazette 31832 dates 30 January 2009 delegated the Authority in terms of the World Heritage Convention Act to the Director General of the Department of Environmental Affairs and Tourism and not to SANParks. The Gazette then meticulously lists all the properties (Core and Buffer) that form part of the CFRPAWHS. It is important to note that ONLY the Table Mountain Section of the World Heritage Site included a buffer zone. This was done as a result of specific recommendations by the IUCN regarding the management of the CPPNE. The IUCN recognised the threat that urbanisation would have on the World Heritage Site stating the following:

“This growth poses the most significant challenge to the long-term integrity of the area, particularly through increasing pressures for access and urban development, and an increasing incidence of human induced fire.” The report noted that there was no overall management plan for the CPPNE, but noted that a draft management plan for the whole of the CPPNE was under preparation as at Feb 2000. The IUCN Report under the paragraph Boundary Issues made the following specific recommendations:

“The urban edge needs to be clearly defined and legislation enforced.”

“The CPPNE includes a buffer area to the core zone. Activities in the buffer zone...
"must be managed to minimise impact to the core zone."

Response: Noted.

32.6 Problems currently experienced with lack of any Management Plan for the CPPNE and/or Buffer Zone

It would be reasonably expected with all the above legislative restrictions policies and guidelines in place, the management of all properties within the TMNP, CFRPAWHS (both Core and Buffer Zones) and CPPNE would be assured. However, this is simply not happening. Various environmental groups are currently frustrated at the apparent disregard for the legislation by land owners as well as City and Provincial authorities. To make matters worse, SANParks on one hand are refusing to take any action on properties outside of the TMNP (particularly regarding the control of alien vegetation), but then they are getting involved in doing deals with property owners inside the CPPNE and or Buffer Zone of the CFRPAWHS resulting in them lifting their environmental objection against such developments and thus paving the way for such properties to be sub-divided and developed.

The following specific areas need to be urgently addressed:

All properties outside the TMNP but in the CPPNE and/or Buffer Zone fall exclusively under Provincial jurisdiction
All of the checks and balances which were put in place over many decades to ensure protection of the CPPNE have been set aside, and indeed many have never been put in place.

- There is no authority to manage the CPPNE or CPPA as recommended by the Table Mountain and Peninsula Advisory Committee. So effectively, the MAC of the CPPNE was disbanded but never replaced by any authority as recommended.
- The Integrated Management Plan as required by the World Heritage Convention Act has never been developed. This is the duty of the Director-General of the Dept of Environment, who had 6 months after the gazetting of the CFRPAWHS in Jan 2009 to put such an Integrated Management Plan in place.
- The Management Plan for the CPPNE as described in the IUCN report has never been finalised.

Property development and political pressure has taken precedence, with the ruling authority in the Western Cape under immense pressure to deliver housing as well as to encourage economic growth in the region.

As things currently stand, all environmental applications regarding properties in the CPPNE and or Buffer Zone of the CFRPAWHS are decided upon by the Department of Environmental and Development Planning, which falls under the Provincial Government of the Western Cape.
Although EIA reports follow a legislative process, Rate Payer Bodies, NGO's and the public feel this to be a waste of time as all such applications are simply being pushed through disregarding all legitimate objections.

The potential for corruption in this process is enormous. Simply stated, a land-owner who owns land in the CPPNE and/or Buffer Zone in the CFRPAWHS finds the land is currently zoned ‘Rural’ or ‘Agriculture’. As a result, the land has very little commercial value. However, should the same land be subjected to a
successful EIA for development, gearing in the value of the land can be enormous. So for example, we have a piece of land near Kommetjie in the Buffer Zone currently zoned Agriculture. The land is totally unsuitable for agriculture, and is rated as CBA1a and CBA1b (the highest ratings for Biodiversity). As it stands, the land is worth perhaps R2-3m. However, should the EIA be successful, it will be subdivided into over 100 residential plots, escalating the value of the property to more than R100m. With donations to political parties still a non-disclosable transaction, it is not inconceivable for such a donation to ‘promote’ the approval of the application at the political level.

There is no counter balance to this threat, and as NGO’s, we have no recourse to prevent this. Although we have absolutely no evidence that this type of practice is occurring, there are a number of environmental bodies currently considering an approach to the Public Protector to have this potential investigated, and to ask her to recommend remedial actions to prevent such a threat.

A number of recent Environmental applications have been approved in the CPPNE and or Buffer Zone including the following:
- Protea Ridge (Remainder of Farm 948, Kommetjie)
- Portion 2 of Farm 1024, Simonstown (Partridge Point)
- Remainder of Erf 61, Glencairn

All these properties are in the Buffer Zone and or CPPNE. In the case of Partridge Point, it is also inside the Marine Protected Zone as well as outside of the Urban Edge.

The City of Cape Town has recently abandoned the 2001 Urban Edge Study. In November 2014, the City of Cape Town placed the 2001 Peninsula Urban Edge Study on the list of policy documents that are to be withdrawn. The IUCN made a specific recommendation that the urban edge needs to be clearly demarcated. The withdrawal of this policy makes it so much easier for properties in the CPPNE and or Buffer Zone to be rezoned, as they can be considered to be within the Urban Edge. Such a decision could indeed bring into question the Integrity of the TMNP as part of the CFRPAWHS. This decision has to be seriously questioned.

Deals negotiated between Property Owners and SANParks Officials. We note with great concern that SANParks are now also involved in negotiations with land owners regarding the development of properties in the CPPNE and or Buffer Zone. This process is described on page 52 of the First Draft Management Plan for TMNP. We note and share the frustration that certain land owners in the CPPNE with development objectives and not conservation goals, are to be considered for some development rights after taking into account: “initial risks to SANParks such as alien clearing costing and requirements”. We are concerned that such land owners are deliberately allowing the spread of aliens and degradation of their environmentally sensitive properties in order to persuade SANParks to come to some kind of negotiated arrangement. In terms of the table on page 53, who decides which category such a property falls into? And is there some kind of peer review or process to ensure the outcome is acceptable to all parties, including the affected community who are not party to such a negotiation? In one such case where Kommetjie Heritage was involved, SANParks had originally objected to the proposed development at Protea Ridge in
Kommetjie. However in a meeting at SANParks offices on 27 August 2013, the EAP Doug Jeffrey as well as the Botanical Specialist for the EAP met with SANParks officials to discuss a ‘preferred’ alternative. This alternative included the recommended development of 40% of the property listed as CBA1a on condition that the balance of the CBA1a land be ceded to TMNP.

The case was obviously denoted as category 5 case providing “Substantial Enhanced Rights” subject to Planning and Environmental Approval. However in this case, the major obstacle to the environmental approval by the Provincial Authority was the SANParks objection. So we have a perfect circular problem ie that the Environmental Approval is subject to SANParks agreeing to the EIA and the SANParks approval is subject to Environmental Approval from the authority. So if we can only convince SANParks of the merits of the case, the approval will be forthcoming! What makes this case more distressing is that in our opinion, the property should have been placed into category 2 which is defined as: “Priority land with development threat. High conservation status, iconic landscapes, isolated, exercise of existing rights likely to have high impact.” This property forms part of the Protea Ridge corridor which was identified as a strategically important corridor to join the Northern and Southern portions of the TMNP; and that such corridor should be at least 300m wide to ensure its viability. The deal struck with the developer will result in the corridor being now less than 300m wide. The property is also entirely categorised as CBA1a and CBA1b from a critical biodiversity classification.

Development of Gated Complexes. Almost all the recent proposed developments in the CPPNE and or Buffer Zone are for gated and electrified up-market residential complexes. This creates a number of issues:

- One of the unique attributes of the TMNP is its openness to the public. However, this attribute is being compromised with these gated complexes bordering on the TMNP and cutting the public off. As a result, the general public are starting to change their attitude towards the park as being exclusively for the affluent.
- The management of fire is significantly impeded by the electrified fences bordering the natural areas. It can be clearly seen that the recent firefighting effort had little to do with saving or controlling the fire in the natural areas, but more to do with protecting property in areas where such properties should never be built in the first place.
- The new Chapmans Bay development at the foot of Ou Kaapse Weg shows the 3m high electrified fences that are being erected right around the property and cutting the property off from the public and the natural area behind it.

Control of Alien Vegetation. The various environmental groups in the Cape Peninsula are very frustrated by the lack of action by owners of private and public property in the Buffer Zone or CPPNE to clear alien vegetation. We have written letters and emails to owners as well as authorities without any response. Again SANParks say they cannot get involved, nor can they send any of the alien clearing teams onto these properties to clear the alien vegetation. It is clear from the recent fires that fires are often started on the fringes of the Park and in the buffer zone where such aliens are abundant. This renders the fire breaks quite ineffective since the fire will have reached an intensity of heat and spread before even reaching the Park.
In conclusion, we offer the observation that a number of developments have been approved within the buffer zone and CPPNE which can have significant impact on the management of the TMNP in a number of areas including:

- Exclusivity of properties surrounding the TMNP
- Cutting the public off from the TMNP, both physically and visually
- Fire management
- Degradation of critically sensitive environmental spaces
- Threat to the Integrity of the World Heritage Status

Response:
SANParks is not involved in ‘deals with property owners’ to pave the way for properties to be inappropriately developed. The Park consolidation strategy (Section 8.2) outlines 5 consolidation mechanisms in table 4.

The TMNP Land Consolidation Strategy is responsive to the particular context of land on the Peninsula and consolidation decisions take into account such criteria as location in relation to the CPPNE and Urban Edge, the governing environmental and land use acts, structure plans, spatial plans, etc. of local and provincial authorities, visual impact, ecological concerns (e.g. fauna, flora, and hydrology), etc.

For example, in line with the strategy, SANParks has over the past 15 years consistently not supported applications for development on many submissions in the CPPPNE, outside the urban edge or on conservation worthy land, which were deemed inappropriate in terms of the consolidation categories. These include the following properties; Zone C, Fish Hoek - residential development, Oudekraal - residential development, Erf 60, Simons Town - residential development, Erf 1 Simons Town – residential development, Erf 4870, Hout Bay – hotel, residential development, CF 1020 Ptn 1&2 - residential development, CF 948 - residential development, etc. Objections to the development of portion 7 of Oudekraal adjacent to Camps Bay involved over 10 years of court litigation by SANParks, City and HWC to overturn the proposal to develop a residential estate on the property.

SANParks’ comments and objections are carefully motivated to ensure impacts are addressed and, where appropriate land is secured for conservation by inclusion in the Park. It should appreciated that, SANParks views / comments on development proposals are only one consideration as there are many others the approving authorities needs to take into account. For example where SANParks has strongly objected to a development proposal the authority (Province) has approved the plan (ie CF 947 Dassenberg, Erf 61 Simons Town). In another instance where SANParks did not object (Erf 3477, Hout Bay) the Authority partially authorised the proposed development. It is therefore incorrect to claim that with SANParks support an authorisation can be granted.

Notwithstanding the view that the CPNNE is a PA and currently excluded from the zoning scheme, the City is still processing land use applications for private
The Integrated Management Plan for the CFRPAWHS, as required by the World Heritage Convention Act, is currently being put in place. The approach of DEA is: To ensure the development of a joint Integrated vision and objectives for the entire World Heritage Site with detail provided in individual Protected Area Management Plans (PAMP’s) and ensure that the respective PAMP’s (as required in terms of NEM: PAA) for the entire World Heritage Site are consistent, integrated and aligned into a broad Integrated Management Plan (IMP) which will serve as guiding tools for decision-making and resource allocation.

The City has not withdrawn the Urban Edge which now forms part of the City’s approved SDF.

SANParks have never used the existence of alien vegetation on a property as a basis for “some kind of negotiated arrangement”. The City (ito its by-laws) and DEA (ito NEM:BA) are responsible for legal compliance regarding alien vegetation. Steps are again underway to address this situation and SANParks has indicated to the City and DEA, properties with invasive alien vegetation that impact on the Park.

**32.7** We recommend that the proposed Management Plan for the TMNP should either include properties within the buffer zone and/or CPPNE into the TMNP Management Plan or to recommend appointment of a parallel statutory advisory body such as a Local National Park Committee to develop a specific management plan to cover these properties.

**Response:** Recommendation is noted. However, legally SANParks can only manage those properties in the Buffer area that fall under its jurisdiction.

**32.8** **Management of Heritage Resources within the TMNP**

There are a number of different heritage resources within the TMNP which require management and specific budget for their maintenance and restoration:

- Physical Heritage (eg Aqueduct, Rhodes memorial, Block House, Cable Way)
- Cape Floral Kingdom
- Grave sites
- View Sites
- Archaeological sites
- Geological Sites
- Cultural traditions

We are concerned there is no specific budget for the maintenance of these heritage resources. We understand that all funds collected at gates and for permits are centralised at SANParks in Pretoria and then allocated nationally to all Parks. However, heritage resources require a different form of funding and cannot rely on the normal national budgetary process. It may be appropriate to establish a separate Conservation Body under the jurisdiction of Western Cape Heritage to oversee the heritage resources with the TMNP. We would recommend that they be given a separate budget distinct from the budget to run the park. We would be willing to assist in the setting up and running of such a heritage body. One particular observation is that there is currently no signage regarding the World Heritage Status within the TMNP. We would appeal that the World Heritage emblem as a minimum be placed on every entry sign into the Park. Generally, the public are unaware of the World Heritage status, many thinking that it is Table
A significant effort will be required on public education regarding the World Heritage status.

*Response*: Noted. With regards the suggestion for WHS signage on TMNP signs will be carried forward into the revision of the signage manual in Section 10.4 Responsible Tourism Programme - Product and Services Promotion objective.

### 33. N Holderness  Fax: 08 May 2015

**33.1** A more positive relationship with the City of Cape Town, both officials and politicians, needs to be developed. SANParks and City are both charged with governance responsibilities to civil society and a working relationship that is not dependant on personalities is essential.

*Response*: This is a requirement of the Heads of Agreement and is addressed in the Stakeholder Management objective in Section 10.5 of the Draft PMP.

**33.2** The system of paid access cards should be simpler. Currently it is confusing, expensive and not easily accessible.

*Response*: See General Response 5.1.1

**33.3** More regular meetings with civil society and informative discussions with civil society, organisations, schools, ratepayers and residents’ associations would be valuable. Personal interactions by officials, however time-consuming, is more valuable and builds better relationships.

*Response*: See General Response 5.1.1

### 34. Newlands Residents Association (NRA)  Written: 16 April 2015 (Stakeholder Meeting)

**34.1** The NRA has an interest in development of the Old Zoo site. There is a worry that there is a greater need for Parking for UCT, rather than a restaurant too close to a noisy freeway, with no views (pine tree downhill from the De Waal Dr). Rhodes Memorial (Tea Room) is wonderful and needs no competition, restaurant wise and views wise.

*Response*: The Groote Schuur Estate and the Zoo site (Section 9.1.4) are being considered for appropriate use such as interpretation, food and beverage, commercial and shared parking with UCT forms part of the plan.

### 35. S Nicks  Email: 11 May 2015

**35.1** The document is an enormous and comprehensive piece of work and the staff involved in compiling it are to be congratulated.

*Response*: Noted

**35.2** Format – while the printing ease of having all of the maps in annexures at the end is appreciated this makes comparing the text and maps unwieldy. Thought should be given to integrating the maps into the text

*Response*: SANParks has decided upon a “family look” for management plans across all parks. This is based on the guidelines for the development of a management plan, as issued by the Department of Environmental Affairs, as
well as lessons learnt over the past couple of years. At this point in time, it’s SANParks’ view that all the relevant maps will be presented as an appendix.

35.3 Section 2 – “objectives” are usually measurable. These “objectives” are more like statements of intent; i.e., principles or goals;

**Response:** Correct, the stated high level objectives and supporting objectives listed in Section 5 are intended to support a long-term Desired State of the Park and are phrased as such. The various programmes in section 10 provide the measurable component that will ensure we achieve the objectives and ultimately the high level objectives.

35.4 P 35 2 (2.1) Consideration should be given to extending the Eco-system services objective to include the role of TMNP to act as a carbon sink for the abutting City of Cape Town, rather than trying to restore it as a stand-alone pristine wilderness with no ecological relationship to the abutting urban settlements. This may result in the need to keep more of the higher biomass tree species, particularly non-invasive alien forests, than would be the case if TMNP was a wilderness 300kms from the city such as the Cederberg;

**Response:** Consideration has been given that the role that fynbos national parks can have as playing a role as carbon-sinks. These studies have found them to be Carbon-neutral due to the frequent fires that occur.

35.5 P 37 4 it would be useful to introduce the notion of how an upper limit to a responsible tourism strategy might be determined, e.g with regard to trails – to encourage their usage to the point where maintenance is no longer affordable

**Response:** Limits of acceptable change are introduced for the tourism sites and product through the Conservation Development Framework visit zones, summarised in Table 22 (Revised Draft Plan).

35.6 P 37 5 TMNP SANParks is sometimes criticised for having poor stakeholder relations. In some instances this may be due to unreasonable expectations and behaviour of visitors and abutting owners. However, it may be useful for an objective (or goal or principle) relating to customer service to be included under 5. This could lead to an improvement in the personable behaviour of visitor interface staff to visitors, response to telephone calls and other enquiries, etc; - many of which are measurable – e.g. some restaurant chains and banks have quality control survey monitors on the desks of customer interface staff;

**Response:** Page 93 there is a sub objective around the continual enhancement of customer service standards which aim to address the above.

35.7 P 41 – 6.2.1 areas identified for remote core and their usage – generally in agreement;

**Response:** Noted

35.8 P 41 – 6.2.2 areas identified for remote and their usage – generally in agreement;

**Response:** Noted

35.9 P 42 – 6.2.3 areas identified for quiet and their usage – generally in agreement;

**Response:** Noted

35.10 P 42 – 6.2.4 areas identified for low intensity leisure – generally in agreement –
however, the recreational activities such as hiking, walking with dogs, mountain biking, etc. identified in the previous areas should also be mentioned here unless these are intended to be node related rather linear related activities – e.g. picknicking in one spot as opposed to hiking along a trail;

**Response:** It is the intent that Low Intensity Leisure area are nodal, as opposed to the linear nature of the listed recreational activities, which in Table 26b (Revised Draft Plan) are seen as suitable in certain location under managed conditions.

35.11 P 42 – 6.2.5 – areas identified for high intensity leisure – generally in agreement – however, these also appear to coincide with the main entry precincts to TMNP and will include car parking and possibly the start and finish areas for events – trail running, endurance horse riding, MTB races etc;

**Response:** Events require special permits that would manage these activities within a High Intensity Leisure Zone.

35.12 Map 7 – visitors use zones – what does the large area of brown around Wilschutsbrand refer to?

**Response:** Noted, this will be corrected.

35.13 P 48 Table 2 – footpaths, management tracks, roads – presumably “EMP activities” refers to walkers with dogs, horse riders, MTB. However, it would be useful to make these activities explicit as it is not clear that “EMP activities” in fact refers to them.

**Response:** Noted, Table refers to Table 26b (Revised Draft Plan)

35.14 P 48 Table 3 – no mention is made of the Devils Peak forest station homestead;

**Response:** It forms part of the Devil’s Peak Quarry site.

35.15 P 48 Table 3 – does “conservation” include interpretive centres or only “visitors centres” such as at Buffelsfontein. There is a need for a visitors/interpretive centre in all the main sections of the park, especially Devils Peak and Table Mountain, possibly at Mount Pleasant, and at Cecilia;

**Response:** ‘Conservation’ refers to the operational function of the Park and where these are located. The need for additional visitor centres will be assessed as part the development and implementation of the Parks interpretation plan.

35.16 P 56 9.1.1 consideration should be given to a bridge over the Kloof Nek intersection to provide a direct connection between Lions Head and Signal Hill and Tafelberg Road. It should accommodate at least pedestrians, cycles and public transport from possible parking garages and public transport access in the Kloof Nek parking lot. This bridge could be an iconic structure such as those of the architect/engineer Santiago Calatrava. MTB facilities, bike washing etc. should be considered at the parking lot

**Response:** This is a City of Cape Town issue and the Park is being consulted.

35.17 P 57 9.1.4 the Rhodes Mem parking area and/or the Zoo site should have MTB...
facilities such as bike washing. If this is linked to a coffee shop synergy for successful concessions such as between Listers and the Tokai MTB parking area can be created;

Response: Various facilities and services could form part of the upgrade of the area.

35.18 P 58 9.1.5 the role of MTBs in the Tokai Manor Precinct should be mentioned as this activity is probably one of the largest users, especially of the upper parking lot and Listers tea room. It would be interesting to know how many MTBers, as well as other trail users, pass through this precinct in the way that the number of visitors to Boulders is noted elsewhere in the draft PMP ;

Response: Noted. This is addressed in the Tokai Manor Precinct Plan.

35.19 P 59 9.1.8 if the intention is that Cecilia/Constantia Nek should achieve a similar status to some of the other park entry points such as Rhodes Mem/Groote Schuur and Tokai this should be stated in this section as the PMP’s term is for 10 years and this could easily be achieved during this time;

Response: The plans for the Constantia Nek upgrade are captured in Section 9.2.3

35.20 It is accepted that excessive MTB single tracks can have a negative impact on biodiversity conservation. However, there are substantial roads, never mind jeep tracks in many of the areas listed in section 9.2 which could be used by different trail users and consideration should be given to this.

Response: Roads, tracks and footpaths for the different recreational activities are determined and reviewed thought the EMP for the activities.

35.21 P 59 9.2.1 City Bowl – mention should be made of the importance of connecting walking, running and cycling trails in TMNP to sidewalks and cycle paths in the City Bowl;

Response: Interfacing with the City’s non-motorised network happens across the Park though the designation of the visitor sites and various access points.

35.22 P 59 9.2.2 Atlantic Seaboard – consideration should be given to a cycle path/MTB trail above Victoria road which could provide both a recreational and alternative commuter mode function for traffic between Hout Bay and Cape Town CBD;

Response: The majority of the area falls outside of the Park as is in private ownership.

35.23 60 9.2.3 Back Table – consideration should be given to sharing of particularly the road routes by MTBs and other trail users in this area;

Response: Roads, tracks and footpaths for the different recreational activities are determined and reviewed thought the EMP for the activities.

35.24 60 9.2.4 Greater Newlands – trails users such as runners, horse riders and MTBs should be specifically mentioned with respect to the linking of recreational activities between Constantia Nek and Newlands Forest;

Response: This section references all recreational activities which need to be investigated. The entire area is not under SANParks management.

35.25 P 60 9.2.6 Silvermine; “ and to promote recreational links… including trail running
and mountain biking"

Response: Links with the City’s non-motorised network happens across the park though the designation of the visitor sites and various access points.

35.26 P 61 9.2.7 Tokai: “investigate the rationalisation of the plantation management tracks and recreational routes – to accommodate trail runners, walkers with dogs, horse riders and mountain biking - to inform phased implementation.”

Response: The proposed rationalisation study referred to in Section 9.2.7 will cover the various user groups as identified in the study.

35.27 P 61 9.2.8 Noordhoek Wetlands – ecological corridor to contain trails for linear recreation – walkers with dogs, trail runners, mountain biking and horse riders;

Response: Additional recreational activities through the sensitive wetlands would have to be assessed as part of the revised EMP for the activities.

35.28 P 61 9.2.11 Cape of Good Hope – alternative trail access points from Scarborough vicinity/Klaasjagersberg rather than just the main entrance near Smitswinkel Bay;

Response: A number of alternative entry points have been considered, but none have found viable in the short to medium term.

35.29 P 61 9.3 Communication Routes – Tafelberg Road must be mentioned here. It is not clear why this iconic route and pedestrian promenade is being allowed to decay to the extent that it is – each year this process continues to add millions of rand to the deferred maintenance bill;

Response: Tafelberg Road is under the management of the City of Cape Town.

35.30 P 68, as per comment 3 above, consideration should be given to TMNP’s ecosystem service role as a carbon sink to the increasingly densifying City of Cape Town that abuts its eastern boundary, and the extent to which higher biomass species such as forest should be retained to assist with role as different to low biomass fynbos;

Response: Consideration has been given that the role that fynbos national parks can have as playing a role as carbon-sinks. These studies have found them to be Carbon-neutral due to the frequent fires that occur.

35.31 P 77, point of digression – Table 5. Have SA taxonomists reclaimed the Acacia genus for rooikrans, wattle, blackwood and port Jackson?

Response: No.

35.32 Offset or priority principles – the various objectives ( or goals or principles) and programmes of the PMP will, on occasion, result in conflict between one another. Consideration should be given to a priority rating or off-set mechanism that will enable these conflicts to be addressed when they arise;

Response: SANParks mandate is Biodiversity management which is its priority objective.

35.33 P 89 Responsible Tourism – it will be useful to have more clarity on the concepts used in this section, i.e. TMNP has been breaking even since 2009
**Response:** Yes.

35.34 Does this mean that since this time all surplus revenues have gone to SANParks national?

**Response:** Yes, as explained in Section 11.2

35.35 What costs and/or investment is included in “breaking even”?

**Response:** All direct Park related costs are included, but excludes special projects project funding such as alien clearing, infrastructure, etc.

35.36 Does this only apply to operating costs?

**Response:** Yes.

35.37 What happens if TMNP wants to invest in a development program relating to one of its objectives?

**Response:** Question is unclear. Relevant PFMA and Treasury guidelines are followed.

35.38 Is “breaking even” achieved through various user groups financing the operating and investment costs of their own particular activities while gate and entrance monies, fees from Cape Pine and possibly National Government transfers, EPWP, W for W etc. are used to fund non-revenue generating activities. Safety and security, alien clearing etc.?

**Response:** Partially, See section 11.2 for income sources.

35.39 Where does the activity card revenue go – into maintenance costs created by the different activities?

**Response:** See General Response 5.1.1

35.40 Does Responsible Tourism incorporate the concept of maximum carrying capacity for various user groups and activities?

**Response:** The CDF defines limits of acceptable to Use Zones and Visitor Sites. See Table 22 (Revised Draft Plan).

35.41 P 91 Responsible Tourism Program – suggest there is a set of objectives – which should be able to be quantified – to promote the use of TMNP by different activity user groups up until acceptable carrying capacities for that activity are reached – with respect to bio-diversity and other objectives;

**Response:** Agreed, See Section Biodiversity tourism monitoring (10.2.1.1 Functional ecosystems programme).

35.42 P 93 “To analyse and review pricing, to optimise financial returns” this sub-objective needs to be unpacked so that exactly what is meant by “optimise financial returns” is understood. See points 32 – 38 above;

**Response:** Noted.

35.43 P 106 new developments must: as far as possible use existing roads and tracks and disturbed sites with no green field developments – provides clarity with regard to developing new trails. However, new single track networks branching off roads or jeep tracks should not be unreasonably excluded.

**Response:** All new Park infrastructure will require compliance with NEMA regulations, including new reactional routes.
<table>
<thead>
<tr>
<th>Page</th>
<th>Section</th>
<th>Notes</th>
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<tbody>
<tr>
<td>108</td>
<td>35.44</td>
<td>Safety and security section is felt to be a bit thin, especially when the current levels of threat, particularly in the northern section and recently above Tokai, are taken into account;</td>
</tr>
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<td></td>
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<td><strong>Response:</strong> The Actions in the Safety and Security programme in Section 10.6.7 of the Revised Draft Plan.</td>
</tr>
<tr>
<td>110</td>
<td>35.45</td>
<td>Expenditure budget - It would be useful to analyse the various cost items in terms of national and international benchmarks – for instance personnel costs shouldn’t exceed a certain portion of the budget;</td>
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<td></td>
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<td><strong>Response:</strong> Expenditure budgets are in line with SANParks and National Treasury standards</td>
</tr>
<tr>
<td>113</td>
<td>35.46</td>
<td>very unusual to show income as a %-- suggest this convention is changed;</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Response:</strong> Figures are not presented as percentages in this section or in the table</td>
</tr>
<tr>
<td>113</td>
<td>35.47</td>
<td>1.2 CDF guiding principles – realised this is an already approved document but would like to suggest that 6th bullet point included “wide range of unique opportunities AND ACTIVITIES for experience and solitude;”</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Response:</strong> 6th bullet already includes ‘activities’ as part of ‘recreation’</td>
</tr>
<tr>
<td>154</td>
<td>35.48</td>
<td>Table 13 Summary of use zone characteristics, Column 6 Type of Activities, mentions hiking, walking, running explicitly and again it is felt that “EMP activities” is too implicit a reference to MTB, walking with dogs and horse riding;</td>
</tr>
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<td></td>
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<td><strong>Response:</strong> The term is ‘recreational EMP activity’ which are referenced in Table 26b (Revised Draft Plan) and are too numerous to be named in the summary</td>
</tr>
<tr>
<td>162</td>
<td>35.49</td>
<td>Neither the terms, hiking, trail running, MTB, walking with dogs, horse riding nor EMP activities are mentioned in the Low Intensity and High Intensity leisure areas. It is believed they should be as most of these activities will start in these TMNP zones;</td>
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<td></td>
<td><strong>Response:</strong> See Table 26b (Revised Draft Plan) for suitability of recreational activities with the visitor zones</td>
</tr>
<tr>
<td>162</td>
<td>35.50</td>
<td>Table 16 Movement Network. NMT and PT should be mentioned under transit route and tourist roads where applicable as cyclists, runners, walkers and possibly bus passengers will be using these routes. Indeed, this should be encouraged in the PMP in keeping with world trends in this direction;</td>
</tr>
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<td></td>
<td></td>
<td><strong>Response:</strong> Interfacing with the City’s non-motorised network and public transport happens across the Park though the designation of the visitor sites and various access points.</td>
</tr>
<tr>
<td>162</td>
<td>35.51</td>
<td>Table 17a Services and infrastructure, MTB facilities should be mentioned in the relevant cells in this table;</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Response:</strong> Table 26a (Revised Draft Plan) is a Tourism Product of which the product category is ‘non-motorised activities’ with the overall Tourism</td>
</tr>
</tbody>
</table>
Framework. MTB is listed in the recreational products in table 27b (Revised Draft Plan).

35.52 | P 164 Table 17b Park Recreation Activities (sp) generally supported
- **Response:** Noted

35.53 | P 182 49) special use permits. It is believed that the use of these for MTBs requires considerable review ranging from identification of cyclists (e.g. number boards) code of conduct for MTBers, enforcement, use of revenue for trail maintenance and development, etc.
- **Response:** See General Response 5.1.1

35.54 | P 184 – No explicit conditions for mountain biking, unlike walkers with dogs 51) and horse riders 52) why is this?
- **Response:** The listed explicit conditions are those relevant to the specific activity

**36. F Dwyer Letter: 04 May 2015**

36.1 | While it is important that plans such as this are made and consultation with various stakeholder taken in to account, it must be recognised that significant changes can take place over a period of five years and the plan should have sufficient flexibility to adapt to changes in circumstances.
- **Response:** See Response 36.28 for combined response.

36.2 | Mechanisms should be in place to communicate and where appropriate consult with, stakeholders on an on-going basis. I believe that one of the major shortcomings in the past has been the TMNP apparent reluctance to communicate with the public.
- **Response:** See Response 36.28 for combined response.

36.3 | Of particular importance is communication with regular users of the Mountain. This applies to organised hiking clubs & associations, tourism organisations and authorities and particularly specialist guides and operators who promote the use of TMNP facilities and have an above average knowledge of Table Mountain and its environment.
- **Response:** See Response 36.28 for combined response.

36.4 | There is no recognition by TMNP of the specialist nature of guiding hikes or the benefits brought to TMNP by promoting the overnight trails to tourists (both local & overseas). It is not a field in which the larger tour operators have an interest.
- **Response:** See Response 36.28 for combined response.

36.5 | There is no recognition by TMNP of the specialist nature of guiding hikes or the benefits brought to TMNP by promoting the overnight trails to tourists (both local & overseas). It is not a field in which the larger tour operators have an interest.
- **Response:** See Response 36.28 for combined response.

36.6 | … that recognition is given to the fact that there are many more Table Mountain users on the Mountain at any one time, than TMNP rangers and other staff. The eyes and ears of hikers, professional or otherwise, be used to provide feedback on environmental issues, path maintenance, illegal / suspicious activities and other security issues, people living / sleeping in the Mountain, fire dangers etc. Formal channels of communication need to established to allow this to take place.
- **Response:** See Response 36.28 for combined response.
<table>
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<tr>
<th>Section</th>
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<tr>
<td>36.7</td>
<td>While it is acknowledge that TMNP cannot communicate directly with each individual coming on to the Mountain, better and more direct communication with the hiking clubs, MCSA, community organisations active in this field and professional guides, with regard to changes in rules, access, path maintenance and security. &lt;br&gt;&lt;br&gt; <strong>Response:</strong> See Response 36.28 for combined response.</td>
</tr>
<tr>
<td>36.8</td>
<td>TMNP and SANParks are to be congratulated on the establishment of the tented camps and the overnight accommodation at Overseers Cottage and Olifantsbos. The feedback and comments from my clients who have used use these facilities are unanimous, they are unique and world class. Many of these people have hiked all over the world and there are not many facilities that compare. This compliments the natural views and environment of Table Mountain. &lt;br&gt;&lt;br&gt; <strong>Response:</strong> See Response 36.28 for combined response.</td>
</tr>
<tr>
<td>36.9</td>
<td>The recent fires notwithstanding, it is a pity therefore that it has not been possible to establish the Hoerikwaggo Trail as a through walk. The number of enquiries that we are getting for this trail has increased substantially and over time it is likely that it would become recognised as one of the great trails of the world. This is not likely to happen quickly and under current circumstances, not likely to happen at all. &lt;br&gt;&lt;br&gt; <strong>Response:</strong> See Response 36.28 for combined response.</td>
</tr>
<tr>
<td>36.10</td>
<td>I note that no mention is made of the trail at all in draft plan. &lt;br&gt;&lt;br&gt; <strong>Response:</strong> See Response 36.28 for combined response.</td>
</tr>
<tr>
<td>36.11</td>
<td>Until recently (before the fires) the information on the TMNP web site was incomplete and misleading. The information on the current web site, while factually accurate, give the impression that clients can’t hike on any sections of the trail, which is likely to lead to abandoning any plans to do even short sections. &lt;br&gt;&lt;br&gt; <strong>Response:</strong> See Response 36.28 for combined response.</td>
</tr>
<tr>
<td>36.12</td>
<td>For a long time the trail was promoted through a web site that led to company that had offered the trail in the past but was not longer offering the trail at all. This appeared to have been officially sanctioned by TMNP. &lt;br&gt;&lt;br&gt; <strong>Response:</strong> See Response 36.28 for combined response.</td>
</tr>
<tr>
<td>36.13</td>
<td>No recognition is given by TMNP and SANParks to the smaller specialist operators, whether it is for promotion of the overnight facilities or hiking in general. It is unlikely that the large mass tour operators have an interest in this field and it therefore has little representation at official level. &lt;br&gt;&lt;br&gt; <strong>Response:</strong> See Response 36.28 for combined response.</td>
</tr>
<tr>
<td>36.14</td>
<td>Complaints / comments / compliments are currently handled by a generic feedback form that is sent to all people making bookings. The questions posed on these forms are very often irrelevant to tour operators using the facilities more frequently than the public. For example there is never hot water in the kitchen at Oranekloof (and more recently at Smitswinkel) this has been highlighted a few times on the feedback form and nothing is done. &lt;br&gt;&lt;br&gt; <strong>Response:</strong> See Response 36.28 for combined response.</td>
</tr>
<tr>
<td>Paragraph</td>
<td>Description</td>
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| 36.15     | When problems do occur at the overnight facilities, they are usually handled well by the staff, but where the problem is beyond the authority or ability of staff there does not appear to be a management level to which the complaint or problem can be escalated, particularly at the time.  
Response: See Response 36.28 for combined response. |
| 36.16     | From a customer service point of view, tour guides and small operators are under the impression that they are an unimportant components  
Response: See Response 36.28 for combined response. |
| 36.17     | The recent fires should give TMNP to re-think the way this trail is marketed and promoted.  
Response: See Response 36.28 for combined response. |
| 36.18     | The Hoerikwaggo Trail paths and overnight facilities should be recognised as a potential foreign tourist draw card and that hiking in the TMNP be recognised and managed as a tourist activity.  
Response: See Response 36.28 for combined response. |
| 36.19     | The Hoerikwaggo Trail as an entity should be shelved as a complete product until it can be done as a continuous through walk.  
Response: See Response 36.28 for combined response. |
| 36.20     | The current facilities should continue to operate in the current way, self-catering under the management of TMNP, but that recognition is given to tourist operators and guides who offer various services relating to hiking and overnight accommodation, including logistical support, trail organisation and catering.  
Response: See Response 36.28 for combined response. |
| 36.21     | The TMNP should lists guides with recognised qualifications and interacts with the Registrar of Tourist to establish what qualifications are required to guide on the Mountain.  
Response: See Response 36.28 for combined response. |
| 36.22     | The Registered Mountain guides should establish a Mountain Guide association that can speak on behalf of the Mountain guides and with whom TMNP can communicate and interact.  
Response: See Response 36.28 for combined response. |
| 36.23     | A more direct communication line needs be established for complaints / problems / compliments etc. specific to tour operators and tour guides.  
Response: See Response 36.28 for combined response. |
| 36.24     | An operational management level should be established to which a problem can be escalated when the issue is beyond the control of the on-site staff.  
Response: See Response 36.28 for combined response. |
| 36.25     | Attention needs be given to some of the small, but recurring problems at the overnight facilities.  
Response: See Response 36.28 for combined response. |
| 36.26     | The overnight facilities on the Cape Point Trail are in serious need of attention and up-grade, particularly the toilets and showers at the Protea / Restio facility and the |
### 36.27 Security

- I refer to the letter sent to TMNP signed by a group of professional guides, to which not acknowledgement or response has been received which highlights:
  - a deep concern at the recent attacks on cyclists, hikers and other mountain users that have taken place in the Vlakkenberg area of Table Mountain, as well previous incidents in Kommetjie, Kalk Bay, on Lions Head and Devils Peak among others.
  - that the safety of our clients are at serious risk and are faced with a dilemma as to what extent to warn them of that risk. While we can advise and try to avoid certain hot spots, we do not regard ourselves as security personnel and we do not wish to market our services for security reasons.
  - As the current mandated managers of TMNP, SANParks carries the main responsibility for user experience in the Park. Considering how SANParks fails to respond to Table Mountain user needs and how reluctant they are to engage and rely on those with actual Mountain experience, it is clear that they are failing in their duty.
  - In spite of the assurances of TMNP that there are rangers patrolling the mountain, very few have ever come across active patrols. While policing is not regarded as the primary function of TMNP we emphasise our belief that this should be co-ordinated by TMNP, working with the City of Cape Town and the Western Cape Government, with a high level of police involvement.
  - Statistics clearly show that the lowest number of incidents took place when there was a dedicated police unit responsible for Table Mountain. If the police are unable to provide this function then it should be outsourced to a private security company financed by the Province, the City and Table Mountain National Park. We think that community police forums and neighbourhood watch groups of all areas bordering the Park have a lot to offer.
  - Hiking is a major tourism draw card for the City and the region. The Hoerikwaggo Trail tented camps and Overseer’s Cottage accommodation, are world class facilities drawing rave reviews from tourist. Our clients consider that the hiking trails are breathtaking, but it is only a matter of time before there is a serious incident on the mountain involving a visitor. This will not only be a setback for hiking as a tourism activity, but for Cape Town, the Western Cape and South African tourism as a whole.

**Response:** See Response 36.28 for combined response.

### 36.28 The hiking community and particularly the professional hiking and climbing guides could play a significant role in assisting the TMNP in many aspects of managing hiking trails, overnight facilities, security and more. Without recognition, a good and regular line of communication and a spirit of co-operation this is not likely to happen.

**Response:** The TMNP Management plan is updated with consultation and input from all interested stakeholders. The Plan is made available on the SANParks website for comment, public sessions were held across the City of Cape Town and the plan was made available at a variety of libraries.
throughout the city. Notice of the public information sessions were placed in national and local newspapers. Consultation is necessary to make this an inclusive plan representing all interest groups. It is agreed that much can change during the life span of a plan and hence the plan is a high level plan which speaks to objectives for the coming years.

To keep the channels of communication open the Park Forum will be reinstated as a tool to engage with a variety of stakeholders and offer those stakeholders the opportunity to input opinions and recommendations on current and future operations and developments in the Park. Likeminded individuals are welcome to establish associations which can represent their concerns through a chairman. The need for recognised tour guides is acknowledged and hence entry through pay points requires a valid western cape or national tour guide card. A directive from SANParks head office is awaited on whether specialist guides need to register to operate on the mountain. Currently the legal position is as long as you hold the relevant tour guide paperwork you can guide visitors on the mountain. In the interim SANParks has instituted the commercial permit which you currently hold which allows you to operate a portion of your business in the Park.

For up to date communications we refer all visitors and recreational users to front page of our website where all pertinent current information is uploaded and can be assessed. The Communications department is also available to provide comment on any story that might be of interest.

The trail accommodation in its current format is under review and various options are being considered.

The actual trail itself remains a testimony to the vision to be able to walk from the Cape Point tip to the top of Table Mountain. There are two sections of the original trail that traverse private landowners land which prevents a through route as originally envisioned. It is agreed that does not prevent a shorter trail being walked or an alternate routing being used.

The website as referred to in your comments refers to the accommodation as Hoerikwaggo tented camps. The website is currently not reflecting information about the trail due to the fact that the fire has damaged more than 2 days of the trail and hence the trail itself is currently not being sold as a trail. It is agreed that the system is due a rethink.

Jenman Safaris who previously sold the trail for SANParks no longer do so. They did however register the Hoerikwaggo.co.za a domain name and this has in the past created confusion which has hopefully now been rectified.

The tented accommodation is considered good value for money and is catered to a market who wish to use it for overnight accommodation. It is agreed that these camps are indeed set in some beautiful locations within the Park. With this in mind, commission rates for booking accommodation within the SANParks portfolio are negotiated at Head Office and are based on annual bookings across all 21 parks and not just on a per park basis. Commission structures are based on a sliding scale and can only recognise rand value. Recognition of all operators is thus just not possible and hence SANParks introduced a 5% discount for online bookings.

The comment is acknowledged about the generic feedback forms and SANParks is in process of investigating a system that allows for more site specific questionnaire to be sent out.

With reference to complaints that are not resolved on site, the SANParks policy is to complete the guest questionnaire and you will receive feedback as a result, you may contact the Hospitality Services Manager for the Park for a response, should a response still not be forth coming you can then direct your issue to the Park Manager for resolution.
Your comment on the Cape of Good Hope Hiking trail accommodation has been referred for investigation.

Your safety concerns are noted. Entering any national park is done at your own risk. It is recognised that non-gated areas of the Park do lend themselves to criminal activity. To this end a visitor safety team patrols the Park with the purpose of ensuring area integrity. Information on suspicious activity can be supplied to the visitor safety team based at Kloofnek.


<table>
<thead>
<tr>
<th>37.1</th>
<th>Heads of Agreement:</th>
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<tr>
<td></td>
<td>An updated legal framework and negotiated Head of Agreement with the City of Cape Town needs to be in place. The establishment of the Table Mountain National Park was proclaimed in terms of the Apartheid era National Parks Act 1976. Since proclamation, new more progressive affecting the TMNP has been promulgated. This new and entire legislative regime needs to be taken into account especially as it can foster a number of exciting co-operative opportunities.</td>
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*Response:* The National Parks Act was repealed by the National Environmental Management: Protected Areas Act 57 of 2003, effective from 1 November 2005 (NEM: PAA). The Heads of Agreement provided for the change of legislation. The Heads of Agreement defined “the Act” to mean “the National Parks Act (57 of 1976) or such successive legislation in terms of which it is amended or repealed.” SANParks continues to manage national parks under its control in terms of NEM: PAA and other applicable environmental legislation.

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<th>37.2</th>
<th>Partnership:</th>
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<td>Whilst good working relationships between South African National Parks and the City exist with regard to a number of aspects, this relationship can be further improved upon by including the principles and processes that ensure pro-active management of the city-park interface. Matters such as joint marketing, events and tourism, sports and recreation, prevention of land invasion, baboon management, environmental education, job creation, and small business development all stand to be enhanced through collaboration efforts.</td>
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*Response:* Noted. Co-operative governance is dealt with in various meetings / forums that are currently in place.

<table>
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<th>37.3</th>
<th>Inter-governmental engagement:</th>
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<td>Structured inter-governmental engagement is necessary to ensure that this working relationship continues to develop. Considerable benefit will accrue not only to South African National Parks and the City, but importantly to the protection of the park itself, the people of South Africa, as well as international visitors, through greater cooperation.</td>
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*Response:* Noted

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<th>37.4</th>
<th>Public Engagement:</th>
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<td></td>
<td>The re-establishment of forums through which the general public can be more involve in decision making “To maintain and support a vibrant Park Forum” is cited in the existing 2008-2013 TMNP (plan) and yet this has not yet been implemented,</td>
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which is of concern to the City.

Response: See General Response 5.1.4

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<th>37.5 Safety:</th>
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<tr>
<td>The City regards the safety of park users as a pressing concern which requires greater emphasis within the 2015-2025 Park Management Plan.</td>
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Response: The safety of Park users and visitors are of huge concern to SANParks and is thus included as a separate Safety and Security Programme (Section 10.6.7).

<table>
<thead>
<tr>
<th>37.6 Affordability and Accessibility:</th>
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<tr>
<td>Affordability and accessibility of the park, particularly to Cape Town’s disadvantage communities, is crucial in achieving the Mission Statement: ‘A Park For All, Forever’. Clear interventions are required to overcome the boundaries of cost and safety which prevent many Cape Town citizens from enjoying the Table Mountain National Park - our city’s premier environmental and recreational resource.</td>
</tr>
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</table>

Response: About two thirds of the National Park remains non-gated and free of access charges to visit the National park. Only four pay points exist and for these points the Park has developed an affordable access card for local residents (My Green Card), especially those from disadvantaged communities. The Park is investigating means to improving distribution of these cards in disadvantaged communities. The can be purchased at all Cape Town Tourism offices. The greatest cost of accessing the Park lies in the cost of transport to the Park.

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<tbody>
<tr>
<td>38.1 Section 1: Applicable legislative and policy prescripts with which the draft plan is either partially compliant or non-compliant:</td>
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</table>

Response: The object of a management plan is to ensure the protection, conservation and management of the protected area concerned in a manner which is consistent with the objectives of NEM: PAA and for the purpose it was declared.

Section 41(2) of NEM: PAA provides that the park management plan must contain at least seven elements, one of which is a co-ordinated policy framework. A co-ordinated policy framework was prepared for all national parks under the management of SANParks in 2006, as amended.

There is no requirement in NEM: PAA that the Management Plan should have a legislative compliant matrix.

38.2 The Constitution

The plan should be guided broadly by the provisions of Section 24 of the Constitution which provides as follows: Everyone has the right to an environment that is not harmful to their health or well-being: and to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that prevent pollution and ecological degradation, promote conservation, and secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development. The draft plan deals extensively with issues of environmental conservation but bears little reference to the sustainable development imperatives enshrined in Section 24, which are stated to include the use of natural resources whilst promoting justifiable social
and economic development.

The plan does not deal adequately with broad based socio-economic issues, referring only to employment opportunities created via the Expanded Public Works Programme and youth programmes. These are initiatives are laudable but not sufficient to discharge the socio-economic responsibilities of SANParks towards surrounding communities.

Response: NEM: PAA was promulgated as a result of the progressive realisation of the environmental right contained in section 24 of the Constitution and it is aligned to the Constitution.

The Park Management Plan is informed by NEM: PAA and meets the requirements. Therefore Park Management Plan is guided by the provision of the Constitution.

SANParks main objective is conservation. The other objectives in support of conservation and government goals may be progressively realised taking into account SANParks’ financial status. SANParks may only include in the Park Management Plan objectives that are achievable rather than drawing on all objectives for sake of inclusiveness but unable to deliver.

38.3 Legislation pertaining to the role of local government

In terms of Schedules 4B and 5B to the Constitution, local government is mandated to fulfil a range of governance roles, most of which have relevance to management of matters within the park and surrounds. These include the firefighting services, local tourism, building regulation, municipal public transport, municipal planning, municipal public works, pontoon, jetties, piers and harbours, stormwater management, trading regulations, water and sanitation services, beaches, outdoor advertising, cleansing, licensing and control of food outlets, parks and recreation, public places, refuse removal, and traffic and parking.

These governance functions of local government confer authority and are executable everywhere except where specifically excluded by statute. This has been made clear in recent Constitutional Court cases Thus the City has a range of governance responsibilities which it must carry out inside the park and in the interface zone between the park and the greater metropolitan environment. The plan should acknowledge these responsibilities and propose ways in which they may be aligned with and carried out alongside park management functions.

Response: SANParks acknowledges that a local authority is mandated in terms of the Constitution to perform the functions as listed above, within its jurisdiction. Part A Schedule 4 lists the functional area of municipalities and excludes national parks, botanical gardens and marine resources.
The management and development of national parks is an exclusive functional area of the national government and therefore outside the local authority’s mandate. SANParks is mandated to manage national parks in terms of NEM: PAA and is authorised therefore to perform the functions as listed above in national parks.

### 38.4

Besides the Schedule 4B and 5B functions, local government has statutory responsibilities in terms of the Constitution to promote a safe and healthy environment and to promote social and economic development.

The existence of the constitutionally mandated functions and responsibilities of local government referred to above make it imperative that the draft plan be premised on the principle of participatory governance. This is particularly so in the context of the TMNP, which is situated inside and is directly contiguous to the metropolitan environment. The draft plan reflects the City as an ordinary stakeholder with whom it engages prior to making decisions. It should be restructured to allow for a greater participatory role by the City, both in high level policy and strategy formulation and in key operational areas.

**Response:** The management and development of national parks is an exclusive functional area of the national government. SANParks is mandated to manage national parks in terms of NEM: PAA. As a key stakeholder, the City of Cape Town is engaged on issues of common interest that will have an impact on the City of Cape Town.

### 38.5

**Environmental management imperatives stipulated in the NEMA principles**

The following principles contained in Section 2 of NEMA are binding on all organs of state tasked with management of the environment, and are particularly relevant to the management of national parks:

1. **Section 2(4)(d):** Equitable access to environmental resources, benefits and services to meet basic human needs and ensure human well-being must be pursued and special measures may be taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination.

The draft plan does mention the need to make special provision for access to the park by previously disadvantaged communities, but no detail is provided as to how this will be achieved. Access to environmental resources, benefits and services encompasses more than just affordable access into the park via its entry points; it also encompasses deriving social and economic benefits from the park. The draft plan does not contain sufficient assurance that local communities will begin to derive such benefits during the term of operation of the plan. It is stated that particular attention will be given to ensuring participation by marginalised communities, communities with specific concerns and communities that have contractual rights in the park. It is not stated how this will be achieved. This should be spelt out.

**Response:** Section 41(2) of NEM: PAA provides that the management plan must contain at least .... (f) “where appropriate, the implementation of community based natural resource management”. This sub – section (f) is not mandatory despite the peremptory opening in sub – section. This is outlined in Section 10.2.4.

### 38.6

1. **Section 2(4)(j):** The participation of all interested and affected parties in environmental governance must be promoted, and all people must have the
opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured.

The draft plan makes reference to the public participation process undertaken in the process of its preparation. With regard to public participation processes going forward, it refers in a somewhat perfunctory way to stakeholder engagement that will be undertaken. The plan should provide an assurance that future public engagement processes will be compliant with Section 2(4)(j), i.e. there must be an element of capacity building with regard to public participation, and special provision must be made for participation by vulnerable and disadvantaged groups.

**Response:** The Park Management Plan is drafted in terms of NEM: PAA and meets the requirements of NEM: PAA as contained in section 41. See Annexure 2 of the PMP and figure 1 of this report.

<table>
<thead>
<tr>
<th>38.7</th>
<th>1.3.3 Section 2(4)(h): Community well-being and empowerment must be promoted through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means.</th>
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<td></td>
<td>The plan indicates that endeavours are currently being made to empower and educate youth. However there is no indication of any such endeavours being undertaken in respect of the wider community.</td>
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<td><strong>Response:</strong> The Park uses a number of facilities and interventions towards effective community empowerment and environmental education. See response 24.6.</td>
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<thead>
<tr>
<th>38.8</th>
<th>1.3.4 Section 2(4)(k): Decisions must be taken in an open and transparent manner, and access to information must be provided in accordance with the law.</th>
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<td></td>
<td>It is imperative that major management decisions pertaining to the park should be taken openly and transparently. The plan should spell out how this will be achieved.</td>
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<td><strong>Response:</strong> The Park Management Plan is drafted in terms of NEM: PAA and meets the requirements of NEM: PAA as contained in section 41.</td>
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<td></td>
<td>SANParks has developed a Manual in terms of the Promotion of Access to Information Act (PAIA) which is available to the general public on its website and the public is encouraged to make use of PAIA mechanism to access information.</td>
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<tr>
<th>38.9</th>
<th>1.3.6 Section 2(4)(o): The environment is held in public trust for the people, the beneficial use of environmental resources must serve the public interest and the environment must be protected as the people’s common heritage.</th>
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<td></td>
<td>The draft plan should be focused more clearly on serving the interests of the community of the surrounding city and the preservation of the park resources as part of their heritage. It should acknowledge that the park is primarily a public resource held in trust and that commercial beneficiation imperatives</td>
</tr>
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are secondary.

Response: Section 3 of NEM: PAA provides that in fulfilling the rights contained in section 24 of the Constitution, the State through the organs of state implementing legislation applicable to protected areas must act as the trustee of protected areas in the Republic. SANParks, as an organ of a state, is performing its task in furtherance of governments' obligations in respect of the environment and more specifically its national conservation/protected areas responsibilities as provided for in the NEM: PAA.

Section 50(1)(a)(i) of NEM: PAA provides that “the management authority of a national park, nature reserve and world heritage site may, despite any regulation or by-law referred to in section 49, but subject to the management plan of the park, reserve or site

(a) carry out or allow

…

(ii) an activity in the park, reserve or site aimed at raising revenue;

……

(2) An activity allowed in terms of subsection (1) (a) or (b) may not negatively affect the survival of any species in or significantly disrupt the integrity of the ecological systems of the national park, nature reserve or world heritage site.”

The commercial activities in a national park is informed by the Park Management Plan and taking into account the provisions of section 50(10(a)(2) of NEM: PAA.

38.10 Environmental management imperatives stipulated in the NEM: Protected Areas Act

1.4.1 The definition of “management”: “management”, in relation to a protected area, includes control, protection, conservation, maintenance and rehabilitation of the protected area with due regard to the use and extraction of biological resources, community-based practices and benefit-sharing activities in the area in a manner consistent with the Biodiversity Act.

The draft plan deals with control, protection, conservation, maintenance and rehabilitation of the park, but there is no reference to extraction of biological resources, community-based practices and benefit sharing activities. Thus the draft plan’s conceptualisation of management is not fully aligned to the Act.

Response: See Section 10.2.4 for the Resource Use Programme.

38.11 1.4.2 Section 2(f) (objects of the Act): (f) to promote participation of local communities in the management of protected areas, where appropriate.
The draft plan does not propose a vehicle or mechanism for the participation of the local community in the management of the park. This is a significant omission.

Response: The Draft Plan will have an associated lower level plan for Stakeholder Engagement (See Section 10.5 Constituency Building Programme – Stakeholder Management Objective and see General Response 5.1.4

38.12 1.4.3 Section 3 (trusteeship by the state): In fulfilling the rights contained in section 24 of the Constitution, the State through the organs of state implementing legislation applicable to protected areas must- (a) act as the trustee of protected areas in the Republic: and (b) implement this Act in partnership with the people to achieve the progressive realisation of those rights.

The draft plan does not contain any proposals for the implementation of the Protected Areas Act in partnership with the people.

Response: The Park Management Plan is drafted in terms of NEM: PAA and meets the requirements of NEM: PAA as contained in section 41 of the Act. See Section 10.5, Constituency Building of the Plan.

38.13 1.4.4 Section 17 (purpose of protected areas) includes the following: The purposes of the declaration of areas as protected areas are- ...

(j) to manage the interrelationship between natural environmental biodiversity, human settlement and economic development;

(k) generally, to contribute to human, social, cultural, spiritual and economic development.

There is no mention in the draft plan of mechanisms to manage the relationship between the biodiversity of the park and human settlements and economic development. The draft plan also does not propose mechanisms to contribute to human, social, cultural, spiritual and economic development in the surrounding communities.

Response: The purpose of the Park is stated in Section 5.1 and is aligned to Section 20 (purpose of a national park) of the NEM:PAA.

38.14 1.4.5 Section 39(4): A management plan must take into account any applicable aspects of the integrated development plan of the municipality in which the protected area is situated.

There is no reference in the draft plan to the City of Cape Town’s IDP imperatives. These are particularly relevant in the context of TMNP given that it is embedded within the metropolitan area. In particular the IDP imperatives of ‘opportunity city’, ‘caring city’ and ‘well-run city’ are relevant.

Response: Noted – the draft plan will be revised to include reference to the City’s IDP. Section 10.1.2 Mainstreaming Biodiversity Programme has a specific action to “Participate in City and Province SDF and IDP processes”.

38.15 1.5 The Buffer Zone Strategy for National Parks, 2012

This strategy lays down mandatory objectives and processes pertaining to the governance of the interface area between national parks and surrounding areas
and communities. It is particularly relevant to the governance of the Table Mountain National Park, given that the park is embedded in a metropolitan environment, and thus there are ongoing cogent governance issues arising in the interface.

Surprisingly, there is no reference to the strategy in the draft plan. Aspects of the strategy which should be dealt with in the plan are outlined below.

The following goals enunciated in the strategy are particularly relevant in the context of the management of the TMNP and a reference thereto should be incorporated into the draft plan, together with detail as to how they will be attained.

Response:
SANParks has reviewed the applicability of the governments’ “Strategy on Buffer Zones for National Parks” for the TMNP and has determined that the optional additional buffer zones is currently not considered necessary for the proper conservation and effective protection of the Park and its objectives. See Sections 6.2.7 Park buffer zone and Annexure 3: Section 6.

38.16 1.5.1 Goal 1: Develop and introduce appropriate strategies, mechanisms and incentives to integrate national parks areas into the broader ecological and social landscape, and encourage conservation in adjacent private and communal areas.

It is particularly significant that it is mentioned under this goal that buffer zones for national parks must be identified in all park management plans. This is a significant omission in the draft plan.

Response: See Response 38.15

38.17 1.5.2 Goal 2: Support and promote activities adjacent to protected areas that are compatible with and which complement the objectives of the protected area. There is no reference in the draft plan to support and promotion of such activities.

Response: See Response 38.15

38.18 1.5.3 Goal 3: Discourage development in areas in which biodiversity and ecological function would be adversely affected. Under this goal the need is emphasised for collaboration between the three spheres of government with regard to land use issues in the buffer zone.

The draft plan makes no reference to such collaboration.

Response: See Response 38.15

38.19 1.5.4 Goal 4: Conserve and make sustainable use of biological resources in the buffer zone and avoid or minimise adverse impacts on the biodiversity of such areas. Under this goal it is mentioned that park management authorities should promote conservation stewardship in areas surrounding parks.

The draft plan makes reference to acquisition of conservation — worthy land for inclusion into the park, but does not consider stewardship incentives.

Response: See Response 38.15

38.20 1.5.5 Goal 5: Support the development of community based biodiversity management initiatives as part of a broader set of approaches to land use planning and developing local sustainable development strategies. Under this goal the need for partnerships with communities and municipalities is emphasised.
Also, alignment with the IDP of the local municipality is stated to be imperative. There is no reference to this in the draft plan.

**Response:** See Response 38.15

| 38.21 | 1.5.6 Goal 6: Promote the development of partnerships between the management authority, other conservation authorities, community organisations, non-governmental organisations and private entrepreneurs for purposes of planning and managing the use of resources within the national park buffer zone, and optimising benefits for local people. Under this goal, integration of the national park and its buffer zone into the spatial development framework and the IDP of the municipality are emphasised. In particular it is stated that the development of national park fora is encouraged. Reference is made to joint ventures with communities and agreements for the supply of goods and services from local sources. None of these issues are addressed in the draft plan. **Response:** See Response 38.15 |

| 38.22 | 1.5.7 Goal 7: Enhance the capacity of communities residing in or adjacent to protected areas to participate in protected area management through providing appropriate training and education, and through recognising local expertise and traditional institutions. Reference is made in the draft plan to the use of EPWP funding to create jobs within the park. However there is no reference to the provision of training and education and the recognition of local expertise and traditional institutions. **Response:** See Response 38.15 |

| 38.23 | 1.5.8 Goal 8: Take steps to avoid or minimise damage caused to people by wildlife. In the TMNP context, the most prevalent incidence of wildlife emanating from the park causing damage to humans is baboons. The draft plan refers only to the participation of SANParks in intergovernmental groups dealing with baboon management. No reference is made to steps taken to minimise or reduce damage caused by baboons. This is a particularly cogent issue in the present context given that the park is unfenced. The strategy requires that animals escaping from the park must be captured or otherwise dealt with to serve the public interest and avert danger. No mention of such initiatives is made in the draft plan. **Response:** See Response 38.15 |

| 38.24 | 1.5.9 Goal 9: Improve benefit flows to people in and around protected areas. In terms of this goal, park authorities are obliged to procure goods and services from surrounding areas and employ personnel from these areas. In addition they are enjoined to facilitate joint venture schemes and develop infrastructure which serves the park and the surrounding community. Furthermore they are required to promote co-management agreements where appropriate, and to designate areas in the park for sustainable resource use. In addition they are required where appropriate to facilitate the development of compensation agreement with those... |
who have lost access to resources or have suffered damage caused by wildlife.
The draft plan makes no mention of benefit flows to surrounding communities.

Response: See Response 38.15

38.25 Note - The draft plan does refer to buffer zones, but only as conceptualised in the World Heritage Convention should be distinguished from buffer zones in terms of the Buffer Zone Strategy for National Parks, 2012. In S6.2.7 of the draft plan a ‘Park Buffer Zone’ is identified and referred to as a World Heritage Site (WHS) buffer. The World Heritage buffer zones are areas within the park which are not identified as bearing core World Heritage resources. Thus the identification of these zones does not fulfil the requirements of the Buffer Zone Strategy.

Response: See Response 38.15

38.26 The Integrated Development Plan of the City of Cape Town (IDP)
As mentioned above, Section 39(4) of the NLM: PAA requires that a park management plan must take into account applicable aspects of the IDP of the local municipality. There is no reference to the City’s IDP in the draft plan.

This is a significant omission and a loss of opportunity to pursue governance synergies.

Response: Noted – the draft plan will be revised to reference the City’s IDP.

38.27 1.7 The Cape Peninsula National Park Management Policy (2000)
The draft plan should include the management themes contained in this policy, and if not including these themes directly, should be able to ensure that all the principles and policies of the policy are addressed. The policy is still valid and applicable. No reference is made thereto in the draft plan. It is important that a diagram be included indicating that the Park Management Plan is one component of the Operational Environmental Management System determined by the Heads of Agreement, informed by the Management Policy, so that the public understand the overarching process and do not see the management plan in isolation.

Response: The 2000 Park Policy has been superseded by a national SANParks Co-ordinated Policy Framework which is applicable to all national parks is outlined in Figure 2. This approach provides for the Operational Environmental Management System referred to in the Heads of Agreement. Figure 2 will be improved its clarity and intent.

38.28 Section 2: Aspects of the current Heads of Agreement with the City which are not adequately carried forward into the draft plan

2.1 Access Charges
Clause 17 of the Heads of Agreement deals with the imposition of charges for access to the park. It provides that the consent of the City is required for the levying of new charges at entry points where free access was previously allowed. It provides furthermore for the referral to the National Park Committee of any recommendations regarding levying of charges. The contractual commitments of SANParks with regard to access charges as stated above should be reflected in the draft plan.

Response: Noted, this will be referenced in the plan, see Section 2.3 of the PMP

38.29 2.2 Contractual commitment to mutual consultation. Clause 20.3 requires that both
parties must, at the request of the other, enter into bilateral discussions on matters of mutual interest.

This contractual commitment should be mentioned in the draft plan.

**Response:**
Noted, this will be referenced in the plan, see Section 2.3 of the PMP

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<th>Section</th>
<th>Description</th>
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<tr>
<td>38.30</td>
<td>2.3 Aspects of the HoA dealing with environmental management</td>
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<td>Section 13.2 of the HOA provides that “an independent body shall be appointed annually by the National Park Committee to review and evaluate the administration and management of the park by the South African National Parks.”</td>
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<td>Section 13.3 provides that “the review shall be based on the Operational Environmental Management system.”</td>
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<td></td>
<td>Section 13.4 provides that “The SANParks shall afford to the reviewing body such access to information and facilities as may be reasonably required in order to carry out the review.” This provides for transparency and accountability with regard to SANParks’ financial statements, a constitutional imperative.</td>
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<td>Section 13.5 provides that “The costs of the review shall be borne by the local authorities, in equal shares.”</td>
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<td>Section 13.6 provides that “The independent body conducting the review shall prepare a written report which shall be furnished to all the parties to this agreement and shall be made available for publication”.</td>
</tr>
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</table>

A reference to these provisions should be made in the plan, and a commitment should be given to future adherence thereto, or alternative proposals relating to the environmental management process in co-operation with the City.

**Response:**
Noted, this will be referenced in the plan, see Section 2.3 of the PMP

It should be noted that SANParks is performing its obligations in terms of the Heads of Agreement in that Independent assessment reviews of the respective PMPs have been undertaken when the PMP required review i.e. in 2005 for the first (2000) PMP and in 2014 for the second (2008) PMP. The review documents were made available to the City and to stakeholders through the then Park Forum and through the stakeholder workshops of the current review. The reviews mentioned above were undertaken by SANParks at its own initiative.

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<th>Section</th>
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<tr>
<td>38.31</td>
<td>2.4 The importance of a park forum</td>
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<td>The draft plan does not mention the possibility of re-establishing a functional park forum to facilitate dialogue between the park and external stakeholders. The Heads of Agreement refers to a National Park Committee, which currently does not exist. It is a stated imperative in the existing TMNP plan 2008-2013 “to maintain and support a vibrant park forum...” The lack of reference thereto in the new draft plan is a significant omission.</td>
</tr>
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It is mandatory in law that stakeholders be kept continually engaged with SANParks. A park forum or committee is required in order to fulfil this obligation. This forum or committee could contribute to participatory and transparent
governance via establishment of an auditing body to review the administration and management of the park annually or bi-annually.

| Response: See General Response 5.1.4 |

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<tr>
<th>38.32</th>
<th>3.1 Park Context, Purpose, Planning and Zoning</th>
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<tr>
<td>3.1.1 Park Context</td>
<td>There is insufficient attention given to the particular contextual uniqueness of the Park. This includes the very close locational relationship and inter dependence between the City and the Park, and the implications thereof. This covers impacts &amp; risks, policy alignment, institutional co-operation etc. The draft plan does not take into proper consideration that the Table Mountain National Park is the most important nature reserve in the City of Cape Town and simultaneously the foremost public open space recreational amenity for its citizens and visitors alike to use and enjoy. The role of the park as part of the matrix of urban open spaces is not mentioned or considered. While the City of Cape Town believes that SANParks can estimably conserve the nature reserves’ biodiversity, ecology, and scenic attributes, it is of concern that the manner in which the Park is proposed to be managed is similar to the management of controlled access national parks that are not located within city contexts. The City of Cape Town’ s Table Mountain National Park needs different parameters in order to ensure that it continues to function as part of the City’s Metropolitan Open Space System and Biodiversity Network, rather than as an isolated nature reserve. In fact the Fuggle Report of 1994 suggested that it may be expedient for the National Parks Act to be amended to incorporate the criteria described in that policy aimed at managing a park in an urban peninsula context.</td>
</tr>
<tr>
<td>Response: TMNP is foremost, a national Protected Area and World Heritage Site and is not a “nature reserve” as defined in NEM:PAA or a “public open space”. The Parks’ urban context is recognised in Sections 2.1 to 2.12 and in Section 5.6 Park Key Attributes where the “A Park within a city, a city within in a Park” is acknowledged through the various key park attributes (eg ‘non-gated access’; ‘recreational amenity’ etc.).</td>
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<tr>
<th>38.33</th>
<th>3.1.2 Purpose and Vision</th>
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<td>In Section 5 of the draft plan it should be stated that the park is governed by the principles contained in all relevant legislation, not just the NEM:PAA. Relevant legislative management principles should be spelt out and not just referred to, so that the stakeholders can understand what these principles are.</td>
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<td>Response: In terms of NEM:PAA The objective of a management plan is to ensure the protection, conservation and management of the protected area concerned in a manner which is consistent with the objectives of this Act and for the purpose it was declared. The Park Management Plan is drafted in terms of NEM: PAA and meets the requirements of NEM: PAA as contained in section 41. The Park Management Plan must be read in conjunction with SANParks co-ordinated policy framework.</td>
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<th>38.34</th>
<th>3.1.3 Planning Frameworks</th>
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<td>In Section 3 of the draft plan, where reference is made to the Protected Areas Planning Framework, reference should be made to broader planning frameworks applicable to the park and surrounds, in particular:</td>
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</table>
3.1.3.1 The City of Cape Town Zoning Scheme

It should be made clear in the draft plan that the term ‘zoning’ is used in the plan in the context of an internal management tool, and does not represent zoning as per the legislation governing land use, and is not a substitute for such zoning. Currently the TMNP as a spatial entity does not feature in the City’s current Integrated Zoning Scheme (2012). This is still to be addressed. Mention of this should be made in the draft plan. Specific reference should be made to the need for park internal ‘zoning’ to be determined in conformity with the City’s Integrated Zoning Scheme, and the need to achieve such integration going forward. The need for an intergovernmental consultative process with regard to land use issues within and outside the park, should be stated in the draft plan. In particular, where intensity of use of parts of the park increases, this should be planned in a consultative manner with the City, since the City has to manage traffic impacts in the adjoining areas. Similarly, an increase in visitor numbers in any particular part of the park will impact on delivery of services, for example water and sanitation.

Response:
Protected Area ‘zoning’ is requirement of NEM:PAA and thus has legal status as stated Section 1 of Annexure 3.

Section 3 of the draft plan refers to the SANParks’ Co-ordinated Policy Framework which “…encompasses the institutional, ecological, economic and social environment for park management..”; “…is a requirement of NEM:PAA” and is “…intended to give guidelines to the management of all national parks managed by SANParks”. (SANParks Co-ordinated Policy Framework Pg. 4)

Section 41 (2) (g) of NEM:PAA stipulates that protected areas must have, as part of their management plan “a zoning of the area indicating what activities may take place in different sections of the area, and the conservation objectives of those sections”.

Protected area zoning is therefore a legislative requirement and not only an ‘internal management tool’.

Section 6 has been amended to clarify the status of protected area ‘zoning’ as distinct from municipal land use zoning and the need for intergovernmental consultation with regard to land use issues.

3.1.3.2 Spatial planning instruments

In Section 2.8 of the draft plan, it should be stated that the park falls within the City of Cape Town and is bound to take into consideration its IDP (Integrated Development Plan), which includes the City Spatial Development Framework and the District Spatial Development Plans for Table Bay District and South Peninsula District.

Response: Noted - the City context will be acknowledged in the revision of the draft plan

3.1.4 Municipal Planning and building regulations

Municipal Planning and building regulations and Building Regulations and Municipal Planning are areas where local government has executive authority. Given this position, building plans for all structures within the Park must be submitted to the City. The Spatial Planning and Land Use Management Act and
the City of Cape Town Municipal Planning By-law will take effect by 01 July 2015 and the draft plan should deal with the implications thereof.

Response: Section 41(2)(g) of NEM: PAA provides that the management plan must contain at least “a zoning of the area indicating what activities may take place in different sections of the area, and the conservation objectives of those sections, provided that in a marine protected area, the zoning must not conflict with a zoning in terms of section 48A(2)(a)”.

The management and development of national parks is an exclusive functional area of the national government. SANParks is mandated by the Minister to manage national parks in terms of NEM: PAA.

NEM: PAA explicitly provides for the zonation of the national parks in terms of section 41. Section 7 of NEM: PAA provides that (1) In the event of any conflict between a section of this Act and-

   (a) other national legislation, the section of this Act prevails if the conflict specifically concerns the management or development of protected areas;

Section 41 of NEM: PAA will prevail over the Spatial Planning and Land Use Management Act.

Section 156 of the Constitution provides for the municipal power and functions; and it provides, inter alia, that:

“(3) Subject to section 151(4), a by-law that conflicts with national or provincial legislation is invalid. If there is a conflict between a by-law and national or provincial legislation that is inoperative because of a conflict referred to in section 149, the by-law must be regarded as valid for as long as that legislation is inoperative”.

The City of Cape Town Municipal Planning By-law is therefore invalid. The above has been previously pointed out to the City of Cape in the SANParks comments on the Municipal Planning By-laws.

3.1.5 Concept Development Plan:
Section 9 of the draft plan states that recommended sites have been screened for suitability in terms of the Park’s Conservation Development Plan and the Responsible Tourism Product Matrix. This is only legally compliant if these documents have been informed by the correct legal principles, and developed in consultation with stakeholders, interest groups and the City of Cape Town.

The current Conservation Development Framework was not formulated through the process as stated in this objective, and consequently contains proposals for some undesirable, unneeded developments that would not enhance the integrity of the ecological, cultural and scenic resources of the park.

Theme 5 of the Management Policy, 2000. (Conservation Planning and Development) provides a useful framework with regard to development within the park, which should be brought forward into the current draft plan. It states the goal “to ensure that physical conservation planning and development of the Park maintains and enhances the integrity of ecological, cultural and scenic resources,
enables the financial sustainability of the Park, and is integrated and co-ordinated with the development and planning of the surrounding Cape Metropolitan Area. “This goal would be achieved by objective 5a of the policy which is worded as follows: “to plan proactively and strategically, in collaboration with relevant local, provincial and national authorities and stakeholders for any potential development within, or affecting, the Park. Park Management, together with relevant local, provincial and national authorities, shall seek to integrate planning and development in areas of their respective control by producing an overarching Conservation Development Framework for the Park through a participative holistic planning process involving stakeholders, which would assess the need and desirability of proposed development.”

Response: Please note the sites have been ‘screened’ in terms of SANParks internal processes and not ‘scoped’ in terms of a NEMA procedure. Section 1.4 of Annexure 3 refers to the development of and continuity between the original 2001 CDF, the revised 2006 CDF and this revision. Each cycle of revision, including this one, has been done with public engagement in terms of NEM:PAA.

38.38 3.1.6 Park zones and attributes
The identification of various “use zones” on page 40 of the draft plan for different levels of activities is worthy of support. However, the mapping of these zones is unclear and thus it is not possible to make meaningful inputs with regard thereto. The maps should include the underlying cadastral boundaries / streets in order to ascertain which areas are proposed for what activities. The broad categorisation of the zones on page 40 is confusing. For example a ‘close to nature’ experience sounds very similar to — if not identical to — an outdoor natural experience.

Response: The Visitor Use Zones are identified at a landscape not a cadastral level. That is the international norm. They have been mapped to a scale of 1:10 000 and are delineated by natural landscape features such as ridgelines, viewsheds, contours levels or by existing footpaths and tracks. Mapping at a cadastral level is not useful in the landscape context of a National Park as opposed to the urban context of the City’s zoning scheme. High resolution maps are available on the website as well as a high resolution A0 poster was available at the ten public information sessions.

38.39 With regard to remote zones, referred to on page 42, it is of concern that certain activities permissible in this zone core inappropriate. Solitude will be difficult to experience with mountain biking and horse-riding permitted.

Response: The plan states “relative solitude”. This zone has traditionally been frequented by multiple recreation users, such as hikers, trail runners, walkers with dogs, etc. along designated routes.

38.40 The appropriateness of drones, aircraft, helicopters and micro-lights in “quiet” zones is also questioned.

Response: The Quite zone is open to the sights and sounds of the City.
However, aircraft over and in the Park are managed through a permitting system.

38.41 With regard to high intensity leisure zones, the principle should apply of not having facilities which themselves are an attraction, but only providing facilities that enhance the user experience of the natural attraction while not detracting from the natural and scenic amenity or creating any adverse impacts. The Hoeikwaggo camps are an excellent example of this principle and thus commercialisation thereof should be limited.

Response: Facilities are an attraction and should be planned and managed to be appropriate to the context of the Park.

38.42 It is of concern to note that the high intensity leisure zones include numerous heritage sites, such as Lion Battery, Signal Hill Summit, the Magazine Site, Military Road quarry, Kloof Nek, Rhodes Memorial, The Round House in The Glen, Old Zoo Site, and Tokai Manor House. Further, the introduction of major activities into these areas can have negative impacts on the quality of experience of the users in the area who enjoy these areas for the sounds, sights and scents of nature, the heritage resources in their unique settings, and these sites can be transformed into high impact activities with negative visual impacts, impacts of noise, traffic, exhaust fumes, amplified music associated with functions such as wedding receptions, litter, and ecological impacts of additional people impacting on the area. Careful consideration by professional appropriate experts is required before seeking the upgrade of these developments.

Sixteen High Intensity Leisure Zones have been proposed, some of which are currently quiet areas that should not have loud music and traffic impacts, additional parking layouts, etc. imposed on the landscape.

Response:
The TMNP CDF identifies both ‘Visitor Use Zones’ and ‘Visitor Sites’ for the Park. These are all designated as ‘Visitor Sites’ in the plan according to current and envisaged role and volume for each site. (see Tables 24 a, b and c Revised Draft Plan).
Any changes to a site will need to follow due environmental, planning and heritage processes with approvals, authorisations as required. In this process, appropriate assessments will be undertaken with required specialist input.

38.43 It is noted that in the Products categories, it is deemed suitable by SANParks to locate 50 bed hotels in High Intensity Leisure Zones. This is not acceptable for a nature reserve which is surrounded by urban area capable of providing hotels and is also in conflict with the 2” paragraph of 6.2.3 which states “In all cases high intensity leisure zones should reflect the ethos and character of the park with higher order non-park related, urban facilities preferably accommodated within the urban areas”.

Response: As a National Park (not a ‘nature reserve’) within an urban context, a suitable Park zoned and designated site may be identified for accommodation of this nature. Due approval processes would need to be followed as required.

38.44 The zoning maps should be interfaced by maps of heritage resources, vegetation, adjacent land uses, and cadastral boundaries.
<table>
<thead>
<tr>
<th>Response: As the Plan needs to explicitly show the Park Zoning to be formally approved under NEM:PAA. Zones and land-use outside of the Park consolidation footprint, has been intentionally excluded. Cadastral boundaries are inappropriate at a landscape level.</th>
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<tr>
<td><strong>38.45</strong></td>
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<td><strong>Response:</strong> High resolution maps are available for download and were available at the ten Public Information sessions. The individual properties are listed in Section 2 of Annexure 1: Land Declarations</td>
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<td><strong>38.46</strong></td>
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<tr>
<td><strong>Response:</strong> Section 6.3.2 of the draft plan refers to ‘mixed use visitor sites’. The specific activities that are deemed suitable for such sites will be identified through local area / precinct planning for the respective sites. There are currently accommodation facilities at both Kloof Nek and Tokai Manor precinct.</td>
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| **38.47** | **3.2 Infrastructure and Services**

3.2.1 Operation, Maintenance and Upgrade of respective infrastructure

The City has concerns that relate to protection, operation, maintenance, rehabilitation and upgrade of its infrastructure within the park. A number of the proposed developments referred to in the draft plan are related to additional access points or improved access points and need to take into account impacts on the City side of each proposed development. |
| **Response:** Noted – the impacts of any proposal on the City will be addressed in lower level plans and discussions with the City. |
| **38.48** | From an overall traffic management aspect an integrated transport impact assessment (TIA) needs to be carried out for the whole park area and its access points from which a transport management plan is to be developed by TMNP for approval by the city. The draft plan should reflect the need for this. |
| **Response:** Traffic impact studies are undertaken as required in the planning of Visitor Sites developments. |
| 38.49 | With reference to 9.1.1 in the draft plan, re the Signal Hill-Kloof Nek Tafelberg Road upgrade. The proposed people mover study was originally proposed prior to the MyCiti public transport service having been provided, it is now possible for the public to travel from the City centre to Kloof Nek, and to the lower Cableway station via MyCiti. The people mover and the proposed visitor sites upgrades at the Strand Street Quarry, Lion Battery and the summit are all heritage sites that will require a notification of intent to be sent to HWC and SAHRA and will require extensive public participation. A Phase 1 HIA has been done for the Strand Quarry and associated quarries, and all the other sites will require the same to be done, given their heritage significance. It is recommended that the City work in partnership with SANParks and stakeholders on further developments in this area, in particular on plans to upgrade the Kloof Nek intersection to a traffic circle to alleviate congestion and collisions and enhance user safety. The signalised pedestrian crossing has successfully addressed pedestrian safety issues in the area alleviating the need for a pedestrian bridge. |
| 38.50 | Kloof Nek parking area upgrade is welcomed. Additional landscaping, tree planting and picnic areas would be appropriate. |
| 38.51 | On Signal Hill, the proposed mechanical people mover will require increased transport capacity provision which is not mentioned and requires further consideration by, amongst others, the City’s TCT directorate. |
| 38.52 | With regard to the proposed Cape of Good Hope upgrade, a transport management plan needs to be prepared for this location before the city can comment on the individual elements being proposed for Cape Point. |
| 38.53 | The Groote Schuur Estate upgrade would require the input of relevant professionals to ensure that the cultural landscape, biogeographic and socio economic elements are appropriately considered in the upgrade. A Phase 1 HIA would need to be undertaken with input from interested and affected parties and comment from the City, for approval by HWC and SAHRA, to inform any proposed upgrades. Any land use needs to be approved in terms of need and desirability. A Phase 2 HIA would be required to be undertaken once proposals have been developed, informed by the heritage indicators approved by HWC / SAHRA. With regard to the proposed Groote Schuur Estate upgrade, as part of the proposal to |
upgrade the old zoo site a transport impact assessment is required to be carried out.

Response: Noted – due process will be followed.

38.54 With regard to the proposed Tokai Manor Precinct upgrade, a TIA is required, as well as clarity on the time frames and as well as alignment with the city’s relevant master plans including its NMT master plan.

Response: Noted – this will be addressed through the implementation of the Tokai Manor Precinct Plan

38.55 With regard to Boulders Visitor Centre Upgrade, this venue and its proposed upgrade, and other TMNP venues that have large visitor numbers, need to be the subject of separate processes and must be highlighted as such in the draft plan. Measures to improve the parking capacity and other site specific issues need to be costed. None of these aspects are itemised in the draft plan.

Response: Noted – this will be addressed through local area planning

38.56 Cross-referencing is required between Section 9.1.7 (trails) and Table 16 (NMT routes and roads).

Response: Cross reference is already in place

38.57 On Atlantic Seaboard issues, reference is made to implementation of proposals for the Round House precinct and the upgrade of The Glen landscape and picnic areas. These need to be developed in partnership with surrounding communities, ratepayers associations, users of the area, with the City and with the heritage authorities. The volume of amplified music and impacts of traffic from events and functions, detracts from the quiet amenity of this tranquil area during such events. These types of activities are better suited to areas zoned for commercial activities inside the urban areas.

Response: SANParks has worked with local community groups such as Friends of the Glen and the Glen Advisory Body (in which the City has participated) on the future planning for the Glen and Roundhouse. Activities at the Roundhouse (e.g. functions) are managed in terms of the agreed concessionaire’s operational EMP.

38.58 With regard to the Back Table and Orange Kloof, heritage studies are required for the old Farmhouse and the Orange Kloof Homestead. One of these was inappropriately renovated with red brick flooring. It is not known whether Heritage Western Cape approval was obtained. The appointment of a heritage specialist will be essential to any proposals for these facilities and the precinct.

Response: Due process will be followed should any changes be envisaged for these sites. The Old Farmhouse was upgraded in 2000 under directions of the appointed heritage architects.

38.59 The draft plan fails to provide details of the Constantia Nek visitor site upgrades. It is not clear whether the provision of basic services include ablution facilities. The existing stone pines and other mature trees will need protection as part of the cultural landscape conservation.

Response: A concept plan for the upgrade and landscaping of the site has been prepared which includes provision of ablutions, structures for existing
traders, parking and maintenance of mature trees.

38.60 3.2.2 Transport Infrastructure
A public participation process is required as part of the planning process, alignment with the city’s IIP and IRT feeder systems is needed, and provision is to be made for MTB tracks, other tourist transport systems as well as shuttle services attached to remote parking areas.

Response: Noted

38.61 The Back Table access road (9.2.3) requires protection by way of a servitude being registered along its full length between Constantia Nek and the Woodhead and Hely-Hutchinson dams on Table Mountain. This process is the responsibility of the Water and Sanitation Department which department will arrange for the servitude diagram to be framed and the agreement drafted and signed between all affected parties as there are more than just two. Future operation and maintenance of this road will reside with the city.

Response: Noted.

38.62 Non-motorised transport — NMT — has been mentioned in a very limited manner but is an important form of access into and through the TMNP. Much of the NMT infrastructure that has been provided is inadequate and inappropriate and any future improvements need to align with the city’s NMT master plan and to comply with the Department of Transport pedestrian and cycle guideline requirements. A proposal received asks for a cycle path to be built to circumnavigate the mountain chain. Cycle tourism is now a provincial initiative led by the MEC and this needs to be included in the plan with allowance for additional infrastructure such a trail routes.

Response: ‘Non motorised’ routes such as biking and horse tracks in the Park are provided primarily as recreational routes rather than formal NMT infrastructure. Where appropriate these routes can align with City NMT routes and SANParks will co-ordinate with the City in this regard.

38.63 Throughout the draft plan reference is made to the type of use of areas and the extent of impact, etc. All this relates to the ability for the park visitors to gain access in one or other manner to the various areas. Access translates into some form of transport and transport requires some form of infrastructure. Successful nodes generate large volumes of visitors and in many instances the present transport systems are not adequate. The whole aspect of responsibility for the provision, operation, management and financing of transport infrastructure and systems adjacent to or serving the TMNP needs high level interventions. This is not identified in section 10 of the plan — strategic plan — as there are only the following five sub-objectives in table on page 106 listing the infrastructure programme being:
1. Ensure that infrastructure in the park is maintained to a desired state;
2. Ensure continual improvement of the park’s IT infrastructure to support operational requirements;
3. Ensure that all mechanical and electrical equipment is maintained to a desired state;
4. Regulate all unwanted structures and facilities;
5. Develop infrastructure maintenance capacity.

The draft plan appears not to make any provision in its assessment and proposals for issues related to increased traffic generation resulting from, or likely to result in
future from, increased activities in the park. This includes for existing areas such as the Boulders, Kloof Nek and the Groote Schuur upgrade area (pg. 57), as well as future areas (such as the ‘Quarry site’ in the city CBD) where the consequences of increased activity in park areas impacts on infrastructure systems in city areas adjacent to them. This has implications in terms of Transport Impact Assessments and will probably also require development contributions towards future infrastructure upgrades in these areas.

**Response:** Noted – this will be addressed through local area planning and ongoing co-ordination and consultation with the City. An Action to address this comment has been included in Section 10.6.6 Infrastructure Programme.

38.64 Section 7.10 of the draft plan relating to servitudes requires clarification by a map indicating the access right of ways, public roads, utility services, and communication infrastructure referred to in this section.

**Response:** The collation of servitudes, way-leaves, public rights of way, etc. is an on-going, long-term collaboration between the City and the Park. Currently a map detailing these in the Park is unavailable.

38.65 Section 11 — costing of transport and associated infrastructure

Table 8 on page 112 provides a high level indication of costs associated with various elements of infrastructure but no comment can be made as the detail behind the make-up of the summary table is not provided.

The amount of R 70.948 million may appear substantial, but, spread over five years, does not provide for much road and associated infrastructure. Four transport items which require funding support from the TMNP are the following:

1. Oukaapseweg/Silvermine road intersection;
2. Signal Hill/Kloof Nek/Table Mountain development including the Signal Hill Strand Street Quarry development;
3. Boulders visitor centre expansion;
4. Penguin protection — the TMNP should be encouraged to initiate a project to facilitate grade separated crossings for penguins in the breeding ground around Boulders to reduce the risk of penguin fatalities.

**Response:** funding support for infrastructure projects is done on a case by case evaluation.

38.66 3.2.3 Informal Settlements and Land Claims

Section 2.9 of the draft plan refers to land invasions, but without providing adequate detail. The extent of current land invasions into the park should be described, and supported by a map. Strategies for dealing with invasions should be addressed in the draft plan.

**Response:** Section 2.9 (Revised Draft Plan) deals with land claims in the Park of which there are currently none and unauthorised occupations in the Park.

38.67 3.2.4 Water Supply and Dams

An infrastructure element not mentioned in the draft plan is the Silvermine Dam where there is a dam safety concern and uncertainty of ownership of the dam wall, as the city does not make use of this water body as a source of water supply, the issue of decommissioning the dam and making it safe needs to be included in the draft plan.
<table>
<thead>
<tr>
<th>38.68</th>
<th>3.2.5 Electricity</th>
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<tr>
<td>The draft plan should reflect that operation of the city’s bulk water supply systems in the TMNP may impact on the TMNP freshwater programme. The integrity of the ecosystem may not be achieved as some of the operational requirements related to environmental flow allowances from the dams to downstream areas when dam flushing and water treatment plant discharges occur, may be exceeded.</td>
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<td><strong>Response:</strong> Silvermine Dam is managed in terms of the infrastructure clause outlined as per the HoA. Section 2.12.4 has been updated to include the dam infrastructure within the Freshwater ecosystem programme.</td>
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<th>38.69</th>
<th>3.2.6 Telecommunications</th>
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<tr>
<td>From a safety and security aspect improved telecommunication services are required. This could include both wired and wireless systems leading to requests for cell phone masts and optic fibre cable networks to be extended into or adjacent to the TMNP. This is not listed in any aspect of the draft plan.</td>
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<td><strong>Response:</strong> Telecommunications applications are assessed on a case by case basis.</td>
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<th>38.70</th>
<th>3.2.7 Disaster Risk Management Plans and Fires</th>
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<tr>
<td>Safety and Security for Visitors to the Park: All Safety and Security Role players should be involved in identifying risks and threats in the Park. Regular planning should be done to accomplish this to establish contingency plans to reduce the risks and increase the Safety of Visitors to the Park. Communication to the visitors is a vital part of safety and security. Monitoring mechanisms need to be put in place to see that the visitors are complying with the legislation applicable to the Park. The recent pandemic of fires has highlighted the need for functional Disaster Risk Management plans. Whilst access was made available the circumstances could have been different where more routes were closed to vehicles. The plan should indicate whether additional facilities envisioned within the TMNP to deal with similar types and sized events. Also, it should indicate whether there is an annual plan that is updated to manage access and evacuation of identified areas or communities.</td>
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<tr>
<td><strong>Response:</strong> All Disaster Management Agencies meet regularly under the direction of the City Disaster Management Dept. The Park engages with all fire management authorities at local, provincial and national levels. A number of partnerships and agreements are in place to ensure the readiness for large fire events. The Plan has an associated lower lever plan for Integrated Fire Management. This plan is due for review and it is noted that access and evacuation will be addressed in the review. See Section 10.2.1.2 Integrated Fire Management Programme.</td>
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| 38.71 | 3.2.8 General Infrastructure Requirements |
City of Cape Town infrastructure crossing and servicing the Table Mountain National Park (TMNP) is of vital importance to continued service delivery within the TMNP and to the City of Cape Town. This infrastructure comprises electrical reticulation — both above and below ground, sewer water and stormwater pipelines, dams, roads, parking areas, footways, pump stations, staff housing, slipways and boat launching ramps, tidal pools, reservoirs, treatment works and road reserves - proclaimed with and without boundary coordinates. Most of this infrastructure was in place prior to the establishment of the Cape Peninsula National Park before it was renamed Table Mountain National Park. This, and the importance of co-operative governance in managing the infrastructure in future, should be acknowledged in the draft plan.

Response: Noted. See Section 2.4.2 City of Cape Town Heads of Agreement.

38.72 3.3 Culture and Heritage Objective 5a(vii) provides that “Park Management shall, in consultation with local, provincial and national authorities and stakeholders, take proactive steps to conserve cultural heritage resources.” The TMNP provides an iconic image for sense of place within the city. It includes many cultural landscapes, areas of spiritual and religious significance, and aesthetic and scenic aspects which are valued by local citizens and tourists. There are a whole host of heritage sites - potential and declared - within the TMNP, which have not been conserved. Huge potential exists to work with a range of bodies, including the City of Cape Town, to develop exciting new tourism attractions related to the heritage resources of the park. The City of Cape Town’s expertise is available to SANParks to exploit the opportunities that exist. Reference should be made in the draft plan to these possibilities.

Response: Heritage assets are recognised in the draft plan in Section 2.12.9 and as a key attribute in Section 5.6.

The need to work with stakeholders is recognised in the Section 10.3 of the draft plan under the Cultural Heritage programme in the Institutional Capacity objective and set of actions. The City’s offer to assist is acknowledged and appreciated.

38.73 3.3.1 General Comments
Currently there is an unsatisfactory situation with regard to cultural heritage identification, mapping, protection, and management of cultural and heritage resources. The draft plan should commit to a Cultural Heritage Management Programme and include objectives in this regard. It should also provide for ongoing engagement with heritage authorities including SAHRA, HWC and the City.

Response: Section 10.3 of the draft plan under the Cultural Heritage programme in the Heritage Management objective addresses this concern.

38.74 The plan should contain more detail with regard to principles of World Heritage Site management. This should include detail of how such management will be undertaken in an interactive manner with heritage authorities.

Response: This issue is addressed Section 10.1.2 of the draft plan in the WHS management objective.

38.75 The draft plan should emphasise the need for compliance with the NHRA, and
with any agreements in place between the heritage authorities, with regard to the protection, identification and management of cultural heritage resources.

*Response*: Compliance with the NHRA is a legislative requirement.

<table>
<thead>
<tr>
<th>38.76</th>
<th>The draft plan should include an inventory of heritage sites within the TMNP, with their assigned grading’s, and a map.</th>
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<tr>
<td></td>
<td><em>Response</em>: See Cultural Heritage Programme Section 10.3 action to address this need.</td>
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<tr>
<th>38.77</th>
<th>Emphasis was made at the sector workshop on heritage of the importance of SANParks employing experts in cultural heritage aspects as part of the TMNP team, given that it is one of the four pillars of governance of the Park.</th>
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<tr>
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<td><em>Response</em>: See Cultural Heritage Programme Section 10.3 action under the Institutional Capacity Objective.</td>
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<tr>
<th>38.78</th>
<th>With regard to Cultural Heritage (ref. para 2.12.9 of the draft plan) it should be emphasised that the park contains a vast resource of cultural heritage sites which should be inventoried, graded. Mapped and managed for optimum benefit of the community.</th>
</tr>
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<td><em>Response</em>: See Cultural Heritage Programme Section 10.3 action to address this need..</td>
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<th>38.79</th>
<th>Section 5.3: Desired state of Table Mountain National Park</th>
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<td>In this section of the draft plan it should be emphasised that the desired state of the park should include an effective system of heritage resource management for the benefit of the community and tourists, with wide accessibility to facilitate enjoyment of these resources.</td>
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<td><em>Response</em>: See Cultural Heritage Programme Section 10.3.</td>
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<tr>
<th>38.80</th>
<th>Attribute 4 - Rich in cultural heritage It should be mentioned that the park itself is a valuable heritage resource with iconic international status and high spiritual value. With regard to its grading under the NHRA, it would be more accurate to state that the park has been identified as a Grade 1 heritage site by SAHRA, and its formal declaration as such is anticipated in the near future. Further, it should be stated that Table Mountain is a formally protected Provincial Heritage Site.</th>
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<td><em>Response</em>: See Cultural Heritage Programme Section 10.3.</td>
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<tr>
<th>38.81</th>
<th>3.3.2.3.2 Attribute 5 - Rich in scenic land- and seascapes. The link between scenic beauty and cultural heritage value should be stated.</th>
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<td></td>
<td><em>Response</em>: See Attribute Number 4 - Heritage</td>
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<tr>
<th>38.82</th>
<th>3.3.2.3.3 Attribute 12 - Wide stakeholder base and sense of (ownership) custodianship. It should be acknowledged here that there is currently no forum in place for engagement with stakeholders.</th>
</tr>
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<tr>
<td></td>
<td><em>Response</em>: Recommendation is not an attribute, but is acknowledged in Section 10.4. See General Response 5.1.1</td>
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<th>38.83</th>
<th>3.3.2.4 Section 6: Zoning</th>
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<td></td>
<td>It is recommended that heritage overlay zones be identified (similar to the overlay zones in the Cape Town Zoning Scheme) as a useful planning tool and management indicator. This however can only be done once a comprehensive survey of the Park’s heritage resources has been undertaken. These would serve as a tool for protection and judicious management of heritage buildings and resources, particularly those that are incorporated into park leisure zones.</td>
</tr>
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|       | *Response*: See General Response 5.1.1
**Response:** The heritage survey is addressed in Section 10.3 of the draft plan under the Cultural Heritage management programme. A heritage overlay zone can be considered in this exercise.

<table>
<thead>
<tr>
<th>38.84</th>
<th>3.3.2.5 Section 10: Strategic Plan, and Section 2.10: International Listings</th>
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<td></td>
<td>The responsibilities regarding World Heritage Site Management should be clearly delineated. The purpose of the WHS buffer zone should be explained. It should be confirmed that the WHS status of the park is more than a listing but a legal standing conferred by the World Heritage Convention Act, which formally adopted the World Heritage Convention into South African law.</td>
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**Response:** The status of the Park as part of the CFRPAWHS is acknowledged in Section 8.3 and Section 10.1.3 of the draft plan.

<table>
<thead>
<tr>
<th>38.85</th>
<th>3.3.2.6 Section 10.3: Cultural Heritage Management</th>
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<td></td>
<td>Cultural heritage management should be specifically aligned and linked to the Heritage Resource Management Plan. The need for restoration and repair of heritage assets must be emphasised. Methods should be stated to manage and overcome the challenges of resources falling into disrepair, vandalism, and lack of capacity and resources.</td>
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**Response:** Section 10.3, the Cultural Heritage management programme of the draft plan addresses the review of the HRMP. The HRMP addresses the more detailed management of heritage resources.

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<th>38.86</th>
<th>3.3.2.7 Annexures</th>
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<td></td>
<td>Annexure 6: Maps</td>
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<td>A map of the identified Grade 1 area should be included. A map of the Provincial Heritage Sites (PHS’s) within the Park should be included and should show the boundary of the Table Mountain PHS. A map of heritage resources which have been identified should be included, even if not currently complete. Cultural landscapes and heritage resources conservation plan: As there is a plan for development, equally there must also be a plan identifying cultural landscapes and heritage resources that are in need of restoration and/or conservation. These must be mapped and strategies assigned or upgrading and conservation, of equal importance to proposed new developments.</td>
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**Response:** See response 38.76 and Section 10.4, Cultural heritage management.

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<th>38.87</th>
<th>3.4 Tourism, Recreation and Education</th>
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<td></td>
<td>3.4.1 Getting the correct balance</td>
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<td>In Section 2.12.10: Tourism, the draft plan states that “due to its proximity to the City of Cape Town, the Park does not focus on the provision of tourism accommodation, but focuses on the promotion of its natural attributes.” This is a commendable position, but this is not reflected in the CDF which includes numerous accommodation opportunities, including 50 bed hotels.</td>
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**Response:** As a National Park, within an urban context, a suitable Park zoned and designated site may be identified for accommodation of this nature. Due approval processes would need to be followed as required.

| 38.88 | The Concept Development Plan is strongly oriented towards the implementation of |
new tourism products and activities. This focus should be shifted to achieve a balance between the interests of tourists and those of the local community.

*Response:* The overall intention of the Park Management Plan is to achieve balance between the many elements of park management. The Tourism Development Framework is not intended to list all tourism development that will take place. Rather it serves to make appropriate allowance for tourism development should such be identified to be in the interest of all parties.

38.89 In the tourism section only the main gateways and main tourism attractions are addressed. The Park needs to ensure that it has a balanced tourism base. It should also focus on cultural and historic tourism activities aimed at visitors.

*Response:* Noted.

38.90 The tourism base must mention the potential of other points of interest that can be developed in the longer term. Potential attractions include caves, water features, military history, mining history, historical and cultural routes, and medicinal plants.

*Response:* Noted.

38.91 3.4.2 The role of the Park in providing recreational opportunities: 3.4.2.1 Mission statements: Greater recognition should be afforded to the valuable role that the park plays as part of the city’s recreational landscape. Access to sport and recreational opportunities is important in building healthy, liveable, multi opportunity and inclusive communities. Increased recreational opportunities within the Park are essential in achieving the Mission Statement: ‘A Park for all, forever’.

*Response:* See General Response 5.1.2.

38.92 On page 28 of the draft plan one of the intentions of TMNP is stated as follows: ‘allow spiritual, scientific, educational, and recreational and tourism opportunities which are environmentally compatible’. The word allows should be changed to promote as these activities are key in realising the value of the Park for the citizens of Cape Town.

*Response:* “allow” is stated in Section 20(2)(c) of NEM:PAA

38.92 3.4.2.2 Research Audit of recreational facilities

On page 88 of the draft plan a research audit of heritage assets is listed as a key action. It would be beneficial if a similar audit could be conducted of recreational facilities such as hiking and cycling paths, climbing infrastructure etc.

*Response:* Noted

38.93 3.4.2.3 Engagement with recreational users

In the Sub Objective stated on page 92 of the draft plan, recreational users, visitors and travellers are all categorised together, this is inappropriate since the needs and expectations of recreational users are different from those of other visitors.

*Response:* See General Response 5.1.2

38.94 3.4.2.4 Facilitating the use of the park for youth development

This is listed as a Sub-objective on page 92 of the draft plan: The City’s Sport and Recreation department runs extensive youth development programmes throughout the city. It would be beneficial if this department was mentioned as a partner under the key actions associated with this section.

*Response:* See Section 10.5 Constituency Building Youth Development Programme.
### 38.95 3.4.3 Environmental Education

Environmental Education should be reflected on page 37 of the draft plan as a constituency building objective. A distinction should be drawn between an experience in the environment, and environmental education. The latter involves active learning and awareness rising.

**Response:** The Programme covers both aspects.

### 38.96 3.4.4 Pricing

The pricing structure should be addressed to look at ways to make the park affordable to local people.

A breakdown of the apportionment of funds to the various activities mentioned should be provided.

The pricing structure should be geared towards having tourists pay for tourism products, and should not favour having local users pay for the use of resources that have historically been available free of charge. Business principles which favour optimisation of financial returns and development of tourist facilities should not be allowed to overshadow the need to maintain access by the community to resources.

The draft plan expresses an intention to market and sell tourism products, facilities and activities to visitors and recreational users. Before implementation, this broad intention should be re-evaluated to assess the appropriateness of charging for a resource that is provided in nature and has historically been available for free.

**Response:** See General Response 5.1.1

### 38.97 3.4.5 Trails

TMNP has become extremely popular for mountain biking but the trails falling outside of the park generally do not permit this activity. There is a need for an investigation to assess whether it is possible to develop a seamless system where similar activities are permitted on the connecting trails of both TMNP and the surrounds. This investigation needs to cover a range of activities such as trail running, mountain-biking, canoeing and horse-riding.

**Response:** Agreed.

### 38.98 3.4.6 Activities deemed appropriate and inappropriate Tables 17a through to 18b review what uses and activities exist in the park currently and /or may (or may not) be considered appropriate in the park.

Those deemed appropriate include wellness centres, boutique lodges, conference lodges and hotels, mini-golf, sports bars, laundry facilities, fast moving consumer goods outlets, gas equipment hire, banks and apparel outlets.

Given the TMNP’s location within the city all of these land uses and activities can be accommodated within the existing adjacent urban area, thus preserving the natural amenity of the park.

The list of activities deemed inappropriate in the park should be reconsidered. In particular it is not clear why camping is deemed inappropriate whilst other forms of accommodation are not, and why bird hides is considered inappropriate.

**Response:** As a National Park within an urban context, a suitable Park zoned and designated site may be identified for accommodation of this nature. Due
<table>
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<tr>
<th>Section</th>
<th>Comment</th>
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| 38.99   | 3.4.7 Filming and events  
The draft plan should provide for alignment with the City's by-laws relating to filming and events.  

**Response:** Noted |
| 38.100  | 3.4.8 There is considerable potential to expand marine tourism and this option is mentioned in Table 18b. The draft plan should incorporate more detail as to how this will be achieved. Cognizance should also be taken of the Public's existing rights which should not be prejudiced.  

**Response:** This point is noted and will be accommodated within the new legal parameters for marine protected areas. |
| 38.101  | 4.1 General comments  
4.1.1 The ten year review period allowed for in the draft plan is too long for accountable management. This period is also not aligned to the agreed annual and five yearly review cycles provided for in the Heads of Agreement between SANParks and the City. Although the plan as a whole is for ten years, there should be at least a two-yearly periodic management review mechanism.  

**Response:** The ten year term for the park management plan does not preclude the review cycles agreed to. A two yearly review of certain deliverables can be investigated. |
| 38.102  | 4.1.2 The draft plan does not make reference to existing contractual agreements with the City relating to specific management focus areas such as fire, water, roads and electricity. These should be mentioned under the section dealing with existing contracts.  

**Response:** See Section 2.4.2 City of Cape Town Heads of Agreement |
| 38.103  | 4.1.3 In the description of the socio-economic setting of the park it is stated that wealthier, mainly white, communities live close to the park and poorer, mainly black, communities further away. This is incorrect as there are many informal settlements bordering on the park. This statement should be deleted.  

**Response:** Noted, the text will be adjusted. |
| 38.104  | 4.1.4 The draft plan should include a review of the current performance of the park relative to the 2008 management plan, and how the draft plan proposes to pursue or change developing trends in this regard.  

**Response:** The recommendations of the 2014 assessment of the 2008 PMP were incorporated into the current PMP, e.g. better integration of monitoring into Biodiversity Management, improving the limited heritage capacity in the Park, re-establishing a Park Forum. |
| 38.105  | 4.2 Planning related comments  
4.2.1 In Section 8.2.3 of the draft plan reference is made to supporting private property owners applying to enhance their development rights if they donate some of their land to the park. It should be made clear that SANParks is not the authority which is empowered to grant enhanced development rights, and that at best it can only indicate support for applications for such rights. This section as currently worded is likely to create false expectations on the part of property owners.  

**Response:** Section 8 of the draft plan, the Parks’ land consolidation strategy does not state that SANParks will support landowners to apply for enhanced approval processes would need to be followed as required.
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4.2.2 With regard to sites identified for high intensity leisure, there should be limits of acceptable change identified, in order to ensure that heritage resources and species of special concern are protected.

*Response:* Limits of acceptable change are introduced for the tourism sites and product through the Conservation Development Framework visitor zones, summarised in Table 22 (Revised Draft Plan).

4.2.3 With regard to the marine section of the park, insufficient detail is provided with regard to provision of access to the sea by communities traditionally undertaking fishing activities. There is similarly insufficient detail regarding the management of marine access points.

*Response:* Currently marine access sites are managed by the City of Cape Town. An associated lower level plan for the Marine Protected Area will address these issues and be more regularly updated as access points are negotiated with the City of Cape Town.

4.3 Biodiversity related comments

4.3.1 The organogram in the draft plan relating to conservation functions is anomalous. The South region is divided into Central and South, and the North region into Conservation and Visitor Safety. This must be corrected.

*Response:* This anomaly is intentional and the result of the greater need in the North for a dedicated Visitor Safety team; due to the proximity of the city and 24 hour openly accessible nature in the north. In the central and southern section’s visitor safety is integrated into other ranger functions.

4.3.2 The draft plan should contain more detail regarding linkages with the Cape Town Bionet, especially the coast to coast linkage along False Bay.

*Response:* Noted. The plan has been updated accordingly.

4.3.3 The draft plan contains a number of inaccuracies with regard to threatened floral and faunal species. The City’s Biodiversity Branch will gladly provide details of such inaccuracies identified by it.

*Response:* Noted. The City’s Biodiversity Branch has provided the details.

4.3.4 The draft plan should incorporate the provisions of the Management Policy, 2000, with regard to freshwater management. As currently worded the section of the draft plan relating to freshwater management does not provide sufficient detail.

*Response:* Noted

4.3.5 With regard to alien clearing, the draft plan should clearly specify that this must be done in a consultative way and must take into account the cultural and recreational amenity of individual sites. Also, invasive and non-invasive aliens must be clearly distinguished in the draft plan and dealt with separately.

*Response:* See Section 10.2.2, Alien and invasive species programme which specifies that removal of species from the Park is guided by published regulations in
38.113 4.3.6 The draft plan should not refer to the list of alien species contained in the Conservation of Agricultural Resources Act, as this has been superseded and updated by the list contained in the Biodiversity Act.

Response: It is acknowledge that the Alien and Invasive Species List published in 2014 is the contemporary alien species list, but as far as it is know the CARA regulations has not been repealed and are still enforceable.

38.114 4.4 Comments on financial management
4.4.1 The financial planning for the park should be premised on the basis that the primary income stream is from tourism rather than from local users. This principle should be enunciated in the draft plan.

Response: This is indeed the case. Less than 2% of Park income is derived from local recreational users.

38.115 4.4.2 The draft plan should provide a mechanism for financial transparency and accountability to all stakeholders including the local community.

Response: SANParks has developed a Manual in terms of the Promotion of Access to Information Act (PAIA) which is available to the general public on its website and the public is encouraged to make use of PAIA mechanism to access information.

38.116 4.4.3 Where the draft plan refers to possible future development within the park as a source of income, it should be acknowledged that such development is subject to approval processes under land use and building development legislation.

Response: Any development in the Park that requires regulatory approval, permission or authorisation, whether it’s a source of income or not, would be subject to applicable legislation and regulations.

38.117 4.4.4 The draft plan should include a mechanism for periodic financial review to ensure that management systems are cost effective and optimise use of resources.

Response: The national park is entirely subject to the Public Finance Management Act and will most likely be audit annually for compliance to the PFMA and SANParks procurement policy.

Ends.