



deVilliers Brownlie Associates

Cape Peninsula National Park

Draft Conservation Development Framework and Associated Maps

Comments and Responses Report Synthesis of Written Submissions and Responses by Settlement Planning Services and South African National Parks

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Client: South African National Parks

deVilliers Brownlie Associates

**Professional Services in
Environmental Planning and Management**

**21 Menin Avenue
Claremont 7708
South Africa
Tel/Fax • 27 21 6744263
email • dbass@icon.co.za**

Executive Summary

Settlement Planning Services (Setplan) were appointed by South African National Parks (SANParks) to prepare a Conservation Development Framework (CDF) for the Cape Peninsula National Park (CPNP). The CDF is required in terms of the Integrated Environmental Management System developed and adopted, after extensive public participation, for the CPNP.

In November 2000, the draft CDF with five associated maps was made available for scrutiny by interested and affected parties.

This report synthesises the 151 written comments received on the draft CDF and presents Setplan's and SANParks' responses to the comments, for consideration in finalising the CDF.

A number of **general comments** were submitted, not necessarily dealing with the draft CDF, as follows:

- Broad support for, and positive feedback on the draft CDF.
- The consultation process associated with the draft CDF.
- Financial sustainability of the CPNP in relation to the draft CDF proposals.
- The relationship between CPNP and SANParks policy.
- Management of the CPNP, with particular focus on the need to foster meaningful relationships with local communities, the public and interest groups through ongoing consultation, involvement and participation.
- Comments on the document and maps.

Comments on the draft CDF were many and varied, and were directed at most sections of the draft CDF. A significant proportion of comment targeted the management of the Park / City interface, whilst others focused on the different use zones and visitor sites, the management of river systems, cultural heritage considerations, the planning principles and non-invasive vegetation. A substantial number of comments focused on the Activity Guidelines (Annexure A), more specifically on the issue of walking dogs in the CPNP.

The suggestions and comments have added value to the planning process and are responded to in this report by Setplan and SANParks. In responding to the comments, a number of key actions are highlighted which need to be initiated, namely to:

- Prepare the final draft CDF, giving due consideration to the comments received and the responses to these comments, as set out in this report.
- Submit the final draft CDF to the Park Committee for recommendation to the SANParks Board, via the SANParks Directorate, for approval.

- ❑ Once approved, make the CDF available in libraries, publicise its availability to interested and affected parties, and prepare a summarised version of the CDF report in an easily accessible format.
- ❑ Proceed with local area planning studies in terms of the Integrated Environmental Management (IEM) procedure, complying with environmental, heritage and other relevant legislation, to upgrade and rehabilitate the designated visitor sites on a prioritised basis.
- ❑ Initiate consultative processes to prepare an environmental programme and Code of Conduct for each of the various recreational activities undertaken in the Park, starting with dog walking and mountain biking activities as priorities.
- ❑ Prepare a Heritage Resources Management Plan to address the concerns regarding the conservation and management of heritage resources in the Park.

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Introduction

1. Background

On 1 May 1998, the South African National Parks (SANParks) was awarded guardianship of the proposed Cape Peninsula National Park (CPNP). The new Park was officially proclaimed in the Government Gazette of 29 May 1998.

The SANParks prepared a draft Development Framework (DDF) for interested and affected party (IAP) comment in May 1998. Numerous (134) comments were received from IAPs on the DDF, many of which were highly critical.

In early 2000, Settlement Planning Services (Setplan) were appointed by SANParks to prepare a document explaining the process to be followed by SANParks in preparing a Conservation Development Framework (CDF) for the CPNP. This CDF is required in terms of the Integrated Environmental Management System (IEMS) developed and adopted, after extensive public participation, for the CPNP.

The resulting draft document, entitled "Towards a Conservation Development Framework for the Cape Peninsula National Park", dated June 2000, was made available for public comment. In addition, a series of six "Synthesis Maps" presenting a synthesis of up to date information was made available for comment. Comment on the report and maps was used to inform the preparation of the draft CDF and associated maps.

The draft CDF (including associated maps) were made available for scrutiny by IAPs on 11 November 2000. Advertisements notifying IAPs of the availability of the document were placed in the Athlone News, Atlantic Sun, Constantiaberg Bulletin, False Bay Echo, Plainsman, Sentinel News, Southern Mail and Southern Suburbs Tatler on 9 November 2000. In addition, advertisements were placed in the Weekend Argus and Die Burger on 11 November 2000. A number of newspapers and radio stations covered the release of the draft CDF and its contents. Two copies of the draft CDF were placed initially in 10, and later 11, local libraries within the Cape Metropolitan Area. The draft CDF was also available for scrutiny on the CPNP's website. Copies of the draft CDF were made available on request.

A deadline for submission of comment, namely 9 December 2000, was stipulated. However, extensions to this deadline were granted until 19 December on request.

2. Purpose of this Report

The purpose of this report is to:

- ❑ Synthesise comments which were submitted in writing on the draft Conservation Development Framework and associated maps.
- ❑ Present responses to the comments, prepared jointly by Setplan and SANParks.

3. Approach to the Synthesis of Comments

deVilliers Brownlie Associates were responsible for synthesising the comments. Comments have been grouped in two main sections, namely:

Section A: General comments on the Draft Conservation Development Framework and related matters.

Section B: Specific comments on sections of the Draft Conservation Development Framework and associated maps.

The following approach was taken to the synthesis of comments:

- ❑ Comments with a similar theme, or targeting a specific issue or concern, were grouped together.
- ❑ No attempt is made to present each individual comment. However, sample comments are cited to illustrate a group of comments.
- ❑ Reference is made to the source of a particular comment or group of comments, to enable parties to check that their comments have been recorded. The numbers in parentheses in the text provide the reference numbers of specific IAPs who submitted written comment, as listed in Addendum 1.
- ❑ Detailed comments are not reflected. However, reference is made to the nature of detail contained in the original comments. These comments will be made available for scrutiny at SANParks' offices in Meadowridge, on request.

Setplan's and SANParks' response to comments is given in each section of this report. Responses are cross-referenced using a letter and comment number as given in the text; eg "Response B3.5" refers to the response to a specific comment on the draft CDF in Section B, numbered 3.5.

4. Principal Comments

4.1 Comments Received

Addendum 1 contains a numbered list of parties who submitted written comment on the Draft Conservation Development Framework (hereinafter the CDF) and maps. A total of 151 submissions were received, comprising :

- 122 submissions from individuals or groups of individuals.
- 18 submissions from non-government organisations (NGOs), alliances or coalitions of NGOs.
- 4 submissions from government departments, quasi-government departments, local authorities or government bodies.
- 5 petitions, one being part of an NGO submission.
- 1 submission from a museum.
- 2 submissions from representatives of professional institutes.

4.2 Focus of Comments

The main comments are presented below as either general comments on the draft CDF, or as comments on specific sections of the draft CDF and associated maps.

4.2.1 General Comments

There were a number of general comments as follows:

- Positive feedback.
- Consultation process.
- Financial sustainability.
- CPNP and SANParks policy.
- Management of the CPNP.
- Comments on the document and maps.

4.2.2 Draft Conservation Development Framework

Comments focused on the following issues. Sections given in parentheses refer to sections in the draft CDF:

- Executive Summary.
- Introduction (Section 1).

- ❑ Management Specifications (Section 2).
- ❑ Situational Analysis (Section 3).
- ❑ Management Alternatives (Section 4).
- ❑ Conservation Development Framework (Section 5).
- ❑ Conclusions and Recommendations (Section 6).
- ❑ Activity Guidelines (Annexure A).

Section A

General Comments on the Draft Conservation Development Framework

This section contains six groups of general comments, addressed in separate sections. The comments relate to:

1. Positive feedback.
2. Consultation process.
3. Financial sustainability.
4. CPNP and SANParks policy.
5. Management of the CPNP.
6. Comments on the document and maps.

1. Positive Feedback

- a. Highest praise deserved for the SEA approach followed; report is well constructed and easy to read, and it rates as one of the best – if not the best – draft planning document encountered (144).
- b. Generally a good document, correct course of action by drafting a CDF following on the CPNP Policy, moving in the right direction (143).
- c. Aims and purposes of the document seem to be satisfied (14).
- d. Congratulations on an excellent document which will certainly meet the vision of “a Park for all, forever” if properly applied (47).
- e. Great improvement on the Draft Development Framework, more effort has gone into refining use zones and identifying appropriate improvements to visitor sites and access points (50).
- f. Generally an impressive document. It pulls together and integrates meaningfully a large body of work and breaks new ground, for example with the Park/City interface (59).
- g. A reasonable attempt to address the complexities of conservation in an urban park (67).

- h. All Capetonians will welcome the general concept behind the proposals (68).
- i. Very good framework document that takes into account the majority of issues (107).
- j. Generally a coherent and well put together document (128), which builds on documents and information obtained over the years (140).
- k. As a statement of good intentions there is little amiss (139).
- l. Comprehensive and well drawn up in the main (141).
- m. Concepts, principles and policies underlying and proposed in the CDF are strongly supported (148).
- n. Congratulations: The document is impressive; comprehensive and covers a great deal of ground (123).
- o. Proposals are sound and practical, rationale underpinning the CDF, criteria and weighting applied to management areas and use zones is supported, excellent analytical and conceptual work gone into the document (149).
- p. Step in the right direction; principles are largely endorsed (151).

2. Consultation Process

Comments on the consultation process focused on consultation in preparing the draft CDF, notification of IAPs, and accessibility of the draft CDF, the time allowed for comment, and consultation in the broader planning process.

2.1 Consultation in Preparing the Draft CDF

- a. Bodies consulted in framing the draft don't include the key user groups (115).
- b. Comments made on previous draft documentation not addressed (143).
- c. Pleasing to note that concerns and observations raised over the last year have been addressed in the draft CDF (149).

2.2 Notification of IAPs of the Availability of the Draft CDF

- a. As a property owner and resident, should have received direct formal or registered correspondence inviting personal comment (33, 125). How will this absence of formal notification affect the validity of administrative actions taken subsequently, and can these decisions be challenged in terms of the Constitution. (33)

- b. Draft report isn't publicised enough to enable people to know about it, let alone comment on it (34, 48, 86, 101). Couldn't CPNP publicise their plans on the notice boards at entrances to forests (90)?

2.3 Accessibility of the Draft CDF

- a. Documentation wasn't freely or easily available (140) outside libraries (146).
- b. Problems with accessing the draft CDF from website (15, 44, 50, 140, 146).
- c. Why weren't copies made available to those who commented on the DDF? (15).
- d. Draft CDF was not made available in the Blaauwberg area (131).
- e. Pity copies of the draft CPNP couldn't be purchased (115).

2.4 Time for Comment

- a. Time given too short (140). Need extension on time for comments until after the holiday period: The proposal envisages granting a wide range of powers to CPNP management in its implementation, which – since some proposed actions seem to constitute radical restrictions on the time-honoured way which people have enjoyed the mountain – need to be carefully thought through (115).
- b. Appreciate cost of delays and need for Park to complete this process, but believe that a better product could be produced if more time for comment and discussion (143); this time of year is particularly difficult to canvass constructive comment given the start of the holiday season (140, 143).
- c. Rondebosch library only had copies of the draft CDF from 29/11/00, leaving less than 2 weeks in which to comment; this is inadequate (102).
- d. Closing date for comments should be deferred until CPNP Heritage Resource Group has presented their findings to relevant interest groups on heritage resources and made allowance for discussion and debate, and until such time as the revised draft of the Heritage Resources Synthesis Map and accompanying study and report of this Group has been reviewed by the Heritage Committee of the Cape Institute of Architects (133).

2.5 Broader Process

- a. Would be useful to have a diagram showing how the CDF fits into the broader process relative to Policy and Strategic Management Plan (149).

Response to Comments on the Consultation Process (2.1-2.5)

- 2.1a. *The need to prepare the CDF was identified and prioritised in the public process followed to develop an integrated Environmental Management System (EMS) for the Park. Extensive and protracted consultation took place in this process and all parties who participated were written to and invited to make inputs into the CDF process.*
- b. *The concerns previously raised on the Draft Development Framework (DDF) in 1998 were addressed in the IEMS policies and the "Towards a CDF" report.*
- c. *Noted.*
- 2.2a. *As the CPNP is surrounded by thousands of property owners it is, unfortunately, impractical to notify everyone individually when a framework planning study – which confers no legal rights - is undertaken. To initiate the CDF process and invite interested and affected parties to participate a background information document was produced ("Towards a CDF"), 1400 letters were sent out in June 2000 to all those on the CPNP data base, and a media campaign was undertaken. In November 2000, with the release of the draft CDF, a comprehensive media campaign was undertaken again to publicise the availability of the draft CDF and invite comment. As part of this campaign, letters were sent to all who responded to the June 2000 invitation, advertisements were placed in The Argus, Die Burger and community newspapers, press releases were issued, articles placed in ParkNews, and the Park's website was also used to notify interested and affected parties.*
- b. *It is acknowledged that all reasonable opportunity must be provided for all interested parties to participate in the preparation of the CDF; it's believed that such opportunity has been allowed for in the current process.*
- 2.3 *The draft CDF report is expensive to reproduce as it is a lengthy document incorporating colour maps. Attempts were made to make the report accessible to the public as cost effectively as possible (see "Background" section of this Report). Problems were unfortunately experienced by some people in downloading the CDF file from the CPNP website due to the large size of the file. In future we will endeavour to simplify the downloading of files off the Park's website. In addition, to improve communication, an abbreviated 'popular' version in the format of a black and white brochure will be made available.*
- 2.4 *The CDF is prioritised in the CPNP's Strategic Management Plan for the period 2000 – 2004. Finalisation of the CDF is necessary to facilitate remedial actions at priority sites within the Park. Accordingly, the CDF was programmed to avoid unnecessary delays and ensure that the comment period took place before the end of year holiday season. A 4-week period was provided for commenting on the draft CDF and, on request, an additional 2 week extension was granted. This comment period exceeds the statutory 3 week comment period in the Land Use Planning Ordinance. Given these circumstances, and taking into consideration the quantity and quality of comment received on the CDF, the time provided is seen as reasonable.*

2.5 *In the final CDF report a diagram will be included that shows how the CDF fits into the broader process relative to Policy and Strategic Management Plans.*

3. Financial Sustainability

3.1 A fundamental flaw in the draft CDF is the CPNP's financial sustainability. The draft CDF closes down options for commercial development in the park in circumstances where opportunity costs and risks of doing so are undetermined. It is believed essential that **all** possible options for achieving financial sustainability should be kept on the table for careful consideration; it is not the moment to decide which development options – if any – should be pursued (59).

To explain: ecological sustainability is meaningless without financial sustainability. Financial sustainability could conceivably be achieved (59) by:

- Increasing entry tariffs at existing pay points (problematic).
- Generating significant income from more commercial operations within the Park.
- Depend on increased and continual support from government at all levels (uncertain).
- Sell a significant number of season tickets to Capetonians as a contribution by citizens.
- Significantly increase number of visitors through pay points.

Long term security is best served by a mix of these, and perhaps other approaches. If CPNP management accept the majority view that visitors insist on free open access except at existing pay points and are against commercial development within the park, the main options seem to be to increase visitor numbers through pay points and to sell season tickets. For season tickets to become a realistic option for sustainability, need to increase by 100 000 units p/a; at 300 000 per year no additional revenue sources would be needed (59).

3.2 Seems to be a shift away from financial independence; is this so (116)?

3.3 Yet to see some of the alternative ways of raising money being addressed, eg visitor/tourist taxes, WWF funds, donations, etc (15).

3.4 Principle of revenue generated by CPNP being used to cross-subsidise national parks elsewhere needs to be negotiated (107).

3.5 SANParks is the caretaker of a national asset, not the owner of a franchise to exploit a national asset. SANParks is paying large sums of money on staff and consultants' theorising while "not a single cent" is being spent on path

maintenance, which is one of the most pressing problems (15, 139). If they don't have the money to look after the asset they shouldn't have taken on the job (15).

Response to Comments on Financial Sustainability (3.1-3.5)

3.1 *Agree with the need for the CPNP to be financially sustainable, and concur that ecological sustainability is inextricably tied to financial sustainability. This issue was extensively debated in the public process leading to the adoption of the CPNP's first Management Policy. The Park's Management Policy, which forms the basis on which the draft CDF was prepared, clearly states the consensus position adopted on this topic. It is not the intention of the CDF to re-open this debate. As stated in Chapter 2 of the draft CDF, the CDF sets out to contribute to the financial sustainability of the Park. The development of tourism and recreation facilities at suitable sites within the Park is but one of a range of income generation strategies currently being pursued by CPNP management (see Response A3.3 below).*

Following the Strategic Environmental Assessment (SEA) approach, the draft CDF does indeed close down options for commercial development throughout the Park. Using the "limits of acceptable change" methodology, the draft CDF argues that commercial development appropriate to the ethos of a National Park is necessary and desirable at many of the existing tourism, recreation and utility sites within the Park. Given the number of under-utilized sites within the Park, the broad range of commercial options that could be pursued at many of these sites, as well as the limited capacity of CPNP, the draft CDF argues that there is no justification now, or for the foreseeable future, for the 'green fields' development of new commercial sites within the Park.

It is important to note that developments at existing visitor sites are also motivated on the basis of the provision of improved facilities and amenities and the rehabilitation of degraded sites, and not only as commercial ventures.

3.2 *See Response A3.1 above.*

3.3 *CPNP are pursuing a range of income earning strategies, inclusive of the following internal sources: concessions, gate takings, season tickets, film permits, other permits, sale of non-sustainable resources (e.g. timber from commercial plantations), sale of other goods and services (e.g. information, curios). External sources of finance include: donations, Table Mountain Fund, Local Authority grants, Global Environmental Facility, French Grant Funds, National Parks Trust, Ukuvuka, Working for Water, IDC Soft Loans, etc.*

3.4 *Cross-subsidisation is as per SANParks policy and was extensively debated in the IEMS process.*

3.5 *For the 2001-2002 financial year, budgeted expenditure for path maintenance, alien clearing and signage is R4.2m, R12m, and R0.6m respectively. Less than 5% of the Park's operational budget is spent on consultants.*

4. CPNP and SANParks Policy

- 4.1 Frequent reference is made to SANParks' policy which appears to come from Pretoria. Omission of that policy or extracts from it detracts from the credibility of the draft CDF (67). People are worried that the Park is actually being run from Pretoria along the lines of a "non-people" park, and that overtures from Capetonians are meaningless (105).
- 4.2 With reference to CPNP's policy on tahrs, and use of Scoline, it's regrettable that no animal welfare organisations participated in the formulation of the draft "policy report", as animals are involved, and that no reference is made to other environmental or constitutional law (91) [Details of such legislation is included in comment].
- 4.3 CPNP shouldn't lose sight of their responsibility to protect flora and fauna while upgrading and providing facilities to please tourists (92).
- 4.4 No knowledge of CPNP Management Policy and have no access to it (67).
- 4.5 CPNP policies used to award tenders for alien clearing are a cause for concern (86).

Response to Comments on CPNP and SANParks' Policy (4.1-4.5)

- 4.1 *The policy references in the draft CDF are to the CPNP Management Policy which was not formulated in Pretoria but locally, following an extensive public consultation process in 1999.*
- 4.2 *Animal welfare organisations were extensively consulted during the drafting of Park policy. A copy of the legal review regarding other legislation affecting the Park can be obtained from the CPNP.*
- 4.3 *Agreed, see CPNP Management Policy.*
- 4.4 *CPNP Management Policy was formulated on the basis of extensive and protracted consultation with local stakeholders. The Policy can be downloaded from the Park's website. A popular version of the Policy will be made available by the end of January 2001.*
- 4.5 *Standard procedures are followed in the awarding of tenders.*

5. Management of the CPNP

- 5.1 Concerns about SANParks managing the CPNP:
- a. Concerned that CPNP is seen more as a National Park than as an extension of the Metropolitan Open Space System, and that there is “over-management” in unnecessary ways. Rather use few specific rules or signage to solve problems, not additional restrictions (106, 115).
 - b. Inappropriate for SANParks to be involved with Table Mountain in any way; it’s a wilderness area, not a park. Since SANParks have taken control, there has been an increase in vandalism, non-invasive alien trees have been cut down, tahrs have been slaughtered, signs have been changed and have misled visitors, security on the mountain has deteriorated (114).
 - c. The UCT study (1994) recommended amendments to the National Parks Act, which haven’t been enacted. SANParks is thus not really the appropriate authority for the Peninsula’s Nature Area; their Act has been designed for operating in remote, under-populated areas (144).
- 5.2 Accept the role of CPNP management as contained in the draft CDF. But measures to realise the objectives should be subject to the principle that management is there to control the park for the use of the public; traditional access to the park is not a privilege but a right (115).
- 5.3 SANParks needs continuously to pursue a meaningful relationship with local public, communities and NGOs through consultation and participation, and be transparent (115, 143, 145):
- a. If the Park is to be a “park for all, forever”, then the top-down management approach is a poor tool. Tension around the CPNP “civilian” committee epitomises tensions around weak public participation. CPNP’s insensitive management of its filming facilities in Noordhoek, ignoring local residents’ needs, for example, is counter-productive (57).
 - b. Should be consultation on a continuous basis with hikers, not just the Mountain Club; CPNP should encourage the formation of a single body or federation of groups representing hikers’ interests (129).
 - c. Top management must be prepared to meet with and encourage people who want to work with them to make the park work by offering constructive criticism and advice; members of the public must be allowed to assist to be “a park for all”; this does not seem to be happening (105).
 - d. CPNP need to take cognisance of users’ priorities – why start off with a negative, hugely alienating function (controls over dogs) rather than ensuring public safety which must be a top priority, followed by littering, defacing nature, etc (105).

- e. Growing concern about CPNP's dictatorial attitude, autocracy, lack of openness, honesty and transparency, and lack of involvement of public in decision-making (86, 91, 101); felt that top management is following their own agenda not the people's wishes (86, 92, 105). [Details about lack of transparency and honesty given in comment, with specific reference to tahrs (91) and dog walking (101).]
- f. Many of CPNP's recent actions – taking sangomas to Orange Kloof, taking criminals on mountain hikes - have raised concerns (86). Since Richtersveld Community court action against SANParks, SANParks have espoused a participatory approach to conservation; recent events on the mountain suggest that CPNP aren't fully committed to community involvement; this won't be allowed (118).
- g. SANParks should hold a public meeting to explain its agenda to Park users, and why some facilities and entry points have been closed without explanation (115).
- h. SANParks are urged to get involved in the re-negotiation of the Noordhoek Structure Plan to work on a shared vision for the affected area (57).

Response to Comments on Management of the CPNP (5.1-5.3)

- 5.1a. *SANParks' mandate is to manage national parks. The IEMS and CDF are specific tools to determine how the CPNP is managed.*
 - b. *An extensive public process led to the establishment of the CPNP.*
 - c. *Subsequent to the UCT report, the promulgation of complementary legislation has considerably reduced the need for amendments to the National Parks Act (e.g. Veld and Forest Fires Act, National Environmental Management Act, Amendments to the Agricultural Act).*
- 5.2 *Refer to CPNP Management Policy.*
- 5.3a. *The Park needs to address these issues sensitively.*
 - b. *Noted.*
 - c. *Agreed, the Park has a number of initiatives to address this shortcoming (e.g. fire fighting volunteers, eco-guide volunteers).*
 - d. *A wide range of management activities are being addressed by the Park. The issue of dogs is a minor component of the CDF report.*
 - e. *Disagree. The widely publicised IEMS Policy process directly involved over 1200 organisations and a large number of individuals over a one-year period, costing over R1m. Considerable additional resources have been spent in a range of consultative programmes involving the public.*

- f. See Response A5.3e.*
- g. No entry points in the Park have been closed without explanation (e.g. Rhodes Memorial and Silvermine).*
- h. Noted.*

- 5.4 There should be consistent implementation of rules; no relaxation of rules by any one official (131). Concerned that CPNP doesn't have the staff to enforce its rules in relation to the CDF (116).
- 5.5 Officials need to be sensitive to the fact that they could be seen as threatening if they approach walkers, especially women, since a uniform is no guarantee of good faith (105).
- 5.6 Rangers don't need to patrol the park and guide visitors; this is a waste of resources. Fine for keeping out squatters, bark strippers, alien plant clearing, watching cars at car parks. But no number of rangers can guarantee the safety of CPNP users who should rather rely on friends, dogs and cellphones (106).
- 5.7 Are security volunteers recognised (143)?
- 5.8 Agree that management needs a framework, but CDF should guard against being too prescriptive; it should be flexible to be adapted as needs are shown over time (143).
- 5.9 Not sure of local authorities' roles and ways of interacting with CPNP (123).
- 5.10 CPNP should make private landowners of mountain land tow the line in applying conservation principles (129).
- 5.11 Recent review of investment in the CMA shows that development has followed the market and not the MSDF. How will the CDF succeed where MSDF has not? If proposals of this nature can't be implemented, they should not be reflected (150)?

Response to Comments on Management of the CPNP (5.4-5.11)

- 5.4 *Noted. Disagree that staff are the only means of enforcing rules (e.g. volunteers, outsourcing to private security companies, etc).*
- 5.5 *Noted.*
- 5.6 *Disagree – Park rangers are required to fine transgressors. See also Response A5.4.*

5.7 Yes (e.g. honorary rangers).

5.8 Agreed; CDF is a framework with a 5 year horizon.

5.9 The principle of co-operative governance applies (e.g. Bilateral Forum).

5.10 SANParks does not have legal authority unless private land is contracted in.

5.11 There is a fundamental difference between the MSDF and the CDF: The CDF will primarily be used by Park management to guide conservation and development initiatives on land under their jurisdiction. The MSDF, on the other hand, attempted to guide the development of land throughout the metropolitan area which is under multiple private and public jurisdictions.

6. Comments on the Document and Maps

6.1 Comments on the document:

- a. The document is too vague (50) and not particularly user friendly (101).
- b. Report does not go far enough in formulating practical, achievable measures to realise the CDF (151).
- c. The draft proposals are too technical and conceptual for the public to follow. In contrast, Annexure A is easy to understand and has thus attracted most attention. CPNP should give the public a clearer and simpler exposition on the actual restrictions it has in mind (115).
- d. Layman's description of geology and scenery is more appropriate elsewhere. The geological description on the CPNP website is "woefully incorrect" and should be amended (14).
- e. Terminology should be consistent: City of Cape Town, CTM administration, SPM administration, CMC administration (128).
- f. Population of the city of Cape Town is 3 million, not 4 million (128, 150).

6.2 Comments on maps and mapping:

- a. Photocopies maps in black and white can't be read (116).
- b. Map 1.3: Study Area. Blank areas on the map aren't explained (151).
- c. Need map showing CPNP boundaries and Urban Edge, differentiating between use zones and different interfaces, heritage areas and use zones outside the Park (149).
- d. Should not indicate the urban edge, but rather the edge of urban development since a statutory urban edge doesn't exist (149).

- e. Places highlighted on maps should have place names, Head Office should be shown (149).
- f. Proposals for, and existing development at areas currently not managed by SANParks aren't clear on maps (149).
- g. Severe limitation to map at such small scale; resulted in a very limited analysis (149).
- h. Road and transport linkages should have been mapped (149).
- i. Need, in each zone, to identify elements to be conserved, and conservation measures; such elements should be mapped at roughly 1:10 000 scale to be useful (149).
- j. One of the largest, easily mapped conservation elements is missing from maps, namely trees; this is a serious omission in the cultural landscape mapping and should form a significant layer on the CDF (149).

Response to Comments on the Document and Maps (6.1-6.2)

6.1 *It is interesting to note the varied comments made on the document (a-f). Some commentators were of the opinion that the document is too vague, whilst others found it too technical. These different opinions are indicative of the wide spectrum of CPNP stakeholders who have varying interests and backgrounds. In finalising the CDF, note will be taken of the specific comments and suggestions made on the document, and we will strive to make it understandable to all the different CPNP stakeholders. In addition, a concise brochure on the CDF will be prepared as a popular version of the more technical CDF report.*

6.2a. *In the planned CDF brochure, a reproducible black and white version of the CDF map will be prepared.*

b. *A light tone was used to designate the urban areas which, when photocopied, appeared as white. This deficiency will be addressed in the final version.*

c. *The CDF baseline and draft maps are purpose-made to show specific information and proposals. Due to overlap of spatial information, a map - as requested - will be difficult to read.*

d. *The GIS includes data on the existing outer extent of urban development and thus it is possible to show this information on the maps. We are of the opinion, however, that it is preferable to show the delineated and agreed Urban Edge, notwithstanding the fact that it currently has no statutory status.*

e. *Noted.*

f. *Towards reconciling the interface between the Park and surrounding landholdings, the CDF map only reflects proposed Use Zones for this area.*

- g. The CDF covers a vast geographic area. A scale of 1:75 000 (A1 length sheet) proved the most practical for including mapping in the document and is considered adequate to show the requirements of a spatial framework at metropolitan scale. The scale of the mapping can easily be changed, however, given the use of a GIS in its preparation.*
- h. Road and transport linkages were mapped as part of the set of synthesis maps produced as informants to the CDF's preparation. These maps formed part of the June 2000 "Towards a CDF" document.*
- i. As part of subsequent local area planning studies, more detailed mapping will be produced where appropriate.*

Section B

Specific Comments on the Draft Conservation Development Framework

This part of the Comments and Responses document presents comment on 30 different aspects addressed in the draft CDF, covering all the main sections of the draft CDF, as follows:

- ❑ Section 1 synthesises comment on the Executive Summary of the draft CDF.
- ❑ Section 2 synthesises comment on the Introduction (Section 1 of the draft CDF).
- ❑ Sections 3-7 synthesise comment on the Management Specifications (Section 2 of the draft CDF).
- ❑ Sections 8-11 synthesise comment on the Situational Analysis (Section 3 of the draft CDF).
- ❑ Sections 12-15 synthesise comment on the Management Alternatives (Section 4 of the draft CDF).
- ❑ Sections 16-18 synthesise comment on the Conservation Development Framework (Section 5 of the draft CDF).
- ❑ Section 19 synthesises comment on the Conclusions and Recommendations (Section 6 of the draft CDF).
- ❑ Sections 20-30 synthesise comment on the : Activity Guidelines (Annexure A of the draft CDF).

The section numbers given in parentheses in each heading below refer to the target section of the draft CDF.

1. Executive Summary

- 1.1 The planning principles presented here don't appear in the main body of the draft CDF; is this an oversight (128)?

Response to Comments on the Executive Summary (1.1)

- 1.1 *An abridged version of the planning principles was included in the Executive Summary and a more comprehensive version in section 2.7 of the main body of the report.*

2. Introduction (Section 1)

- 2.1 With Reference to the Background:
- a. Need to state that CDF emanates also from SANParks policy (67).
 - b. 1998 proclamation: Need a truly representative advisory committee between CPNP and local authorities, as emphasised in the Heads of Agreement document (67). What process is involved in "co-operative governance between SANParks and local authorities; what are the spheres of responsibility (149)?
 - c. Urban Edge study was never completed an/or approved (67, 149). Developers believe it isn't a significant or inhibiting factor. It remains open to manipulation by politicians (67).
 - d. Should take account of CMC's "Development Control Guidelines in Flood Prone Areas (June 2000)" with regard to wetlands and rivers (148).
 - e. Should incorporate Infrastructure Management Plan currently being prepared (150).
 - f. Support Marine Incorporation (116).
- 2.2 With Reference to the Aims and Objectives of the CDF:
- a. Agree with the objectives of the draft CDF (140, 146).
 - b. Need additional objective: "To identify elements, areas, themes, landscape patterns and qualities for conservation" (149).
 - c. In terms of CPNP Management Policy, the CPNP "shall seek to integrate planning and development...by producing an overarching CDF for the Park...". That is but one of the aims of the CDF: It should be about managing the landscape and conserving and enhancing elements/areas that are significant in the cultural landscape (149).

- 2.3 With reference to the Study Area:
- a. Noordhoek wetlands should be included in the CPNP; it is an urgent local priority. Ongoing management problems along the wetland fringes aren't being adequately addressed by the local authority or Cape Nature Conservation (57).
 - b. Transfer of the northern section of the Noordhoek beach only, ignoring the southern section, is a source of tension. Since CPNP has had control over this sector of the beach there has been an alarming increase in attacks on walkers, surfers and horse riders on the southern sector. If this is how a park for the people works there is little chance of buy in from local residents (57).
 - c. Land suitable/zoned for development on the edges should be purchased and held for swaps with privately owned land in the CPNP (124).
 - d. No mention is made of the rights of private landowners within the boundaries of the ever-expanding CPNP. It's critical that these rights be recognised and included by specific mention in the CDF (123).
- 2.4 The Legal Status of the CDF refers. Will local authorities be represented on the CPNP Committee and so be able to participate in approving the CDF (149)?
- 2.5 The CDF preparation process refers. Need more information on the CPNP's internal approval process and by what criteria the CDF will be evaluated for approval (149).

Response to Comments on the Introduction (2.1-2.5)

- 2.1a. *The CDF emanates from CPNP Management Policy as stated in the draft CDF.*
- b. *A new Park Committee has been appointed by the Minister of Environmental Affairs and Tourism and fulfils this role. The Bilateral Forum and other committees promote co-operative governance.*
 - c. *Noted.*
 - d. *Noted.*
 - e. *Information currently not available but will be incorporated in future CDF review.*
 - f. *Noted.*
- 2.2a. *Noted.*
- b. *This will be addressed in the CPNP Heritage Resources Management Plan.*
 - c. *Noted.*

- 2.3a. *We agree that it is desirable to include the Noordhoek wetlands in the CPNP. There is an on-going initiative to realise this objective.*
- b. *Noted, incorporation will address these issues.*
- c. *Where appropriate private land is being contracted into the CPNP. Where funds are available land is being purchased.*
- d. *Private land is incorporated into the CPNP by mutually agreed contractual arrangements between SANParks and the land owner.*
- 2.4 *Local authority councillors are represented on the Park Committee.*
- 2.5 *CDF will be submitted by Park Management to the Park Committee for consideration. On the basis of CPNP Management Policy the Park Committee will make their recommendation to the SANParks Board via the SANParks head office Directorate. The SANParks Board will consider the CDF for approval in terms of SANParks Management Policy.*

3. Ecological Specifications (Section 2.3)

3.1 Alien Vegetation

3.1.1 General

- a. If trees are to be removed, should be done in stages so that large areas aren't bare (118).
- b. Need more education of the public regarding alien trees (141).
- c. Alien control must be seen as a recurrent task, not a one off (139).
- d. Would support management of pockets of alien vegetation for recreation purposes (150).
- e. Should read "management *and conservation* of non-invasive alien plants *and exotic trees particularly in significant cultural landscapes or where these are significant contributors to the sense of place or genius loci*" (149).

3.1.2 Commercial Plantations

- a. Commercial plantations can accommodate significantly larger concentrations of people and activities, as referred to in "low intensity leisure zones". They are valuable especially in the heat of summer, providing shade. Why are Safcol and SANParks intent on eradicating these plantations (67)?

3.1.3 Removal of Non-Invasive Alien Trees

- a. Management of Newlands Forest doesn't appear to distinguish between "invasive aliens" and "non-invasive aliens"; non-invasive aliens are being ringbarked/removed, and priceless heritage (eg camphor trees) is being destroyed. When there are so many invasive cluster pines and other plant pests, why are such trees being targeted? Should be stopped immediately (71).
- b. CPNP has given assurance that oaks and pines wouldn't be removed without full public involvement – dispute that there has been full public involvement and am unaware of a policy to remove all aliens (71).
- c. Removal of non-invasive alien trees, particularly in fringe areas near the urban edge needs to be handled with care; it's high profile as far as the public's concerned. Perhaps apply model used in Newlands Forest to other areas of the CPNP; where forest split into a lower zone where aliens left alone unless very good reasons for their removal, and upper zone where aliens are removed with few exceptions (141).
- d. SANParks need to take into consideration the cultural and recreational value of some non-invasive trees, particularly to give shade (106, 118). Should leave shady areas in Newlands, Cecilia, Rhodes Memorial, Silvermine for users, especially groups braaing (106).

Response to Comments on Ecological Specifications (3.1.1-3.1.3)

The ecological specifications set out in Section 2.3 of the draft CDF are sourced from the CPNP Management Policy.

3.1.1a. Noted, but often not practical or cost effective.

- b. Agreed.*
- c. Agreed.*
- d. Agreed where appropriate, but not invasive species.*
- e. Refer to CPNP Management Policy.*

3.1.2 Agree where appropriate, but plantations will be consolidated to address scenic and ecological impacts.

3.1.3a. *Refer to Newlands Forest Management Plan.*

b. *This assurance was not given, but refer to CPNP Management Policy.*

c. *Noted.*

d. *Noted.*

3.2 Fauna

3.2.1 Reintroduction of Indigenous Fauna

- a. The park is known for its floral richness, not fauna (67, 143). Would be a waste of time and money to try to rehabilitate the CPNP from a faunal perspective and reintroduce locally indigenous fauna; being in a city, it can't support fauna to the degree of other parks; existing fauna comprises mostly nocturnal and "survivor animals" (67).
- b. Re-introduction of fauna could encourage hunting and poaching (116).
- c. Re-introduction of fauna will be problematic; should be vigilant against creating new stresses and causes for conflict between users and the conservation imperatives (143).

3.2.2 Removal of Alien Faunal Species

- a. "Humane removal of problem alien faunal species" refers. There is much opposition to killing of tahrs on Table Mountain, and many calls for an alternative, humane solution. There is inconsistency in the interpretation and implementation of maintenance of biodiversity and "humane" removal of alien fauna [details provided in comment] (91). No evidence of damage caused by tahrs in CPNP. Eradication of tahrs is xenophobia, not science, and is extremist and absolute. All life forms have intrinsic value, not just indigenous life forms. Why not control their numbers in a humane, rational, way rather than eradicate them (91, 92)? There are humane and cheap alternatives to using Scoline which would be more humane (92) [details given in (91)].
- b. Most damage and threat to biodiversity is caused by humans and alien vegetation; this should be CPNP's priority, not tahrs (91, 92).

3.2.3 Migration Route for Animals

- a. Should be a vision for a migration route for animals from Cape Point to Table Mountain. Land swaps and land acquisitions should be catered for to clear existing built development on such route (124).
- b. Animal underpasses should be built under existing roads; City of Cape Town should be asked to plan for these underpasses whenever road construction takes place (124).

Response to Comments on Ecological Specifications (3.2.1-3.2.3)

- 3.2.1a See CPNP Management Policy. Fauna refers to all fauna not only large mammals.
- b. Disagree, see Response B3.2.1a.
 - c. See Response B3.2.1a.
- 3.2.2a This issue has been addressed in a separate forum between SANParks, CPNP Management and the relevant IAPs.
- b. The Park is involved in a range of management activities.
- 3.2.3a Noted.
- b. Noted.

4. Cultural Heritage Specifications (Section 2.4)

- 4.1 Need to define “cultural landscape” and “cultural heritage” resources. The term cultural landscape is a useful concept for approaching analysis of the mountain; should incorporate history, contemporary use and value, and potential value. Brief to HLG should have included a broad approach to cultural landscapes not only cultural resources (149) [motivation and details given in comment].
- 4.2 Include “managing *and conserving* non-invasive alien plants within the historical *and contemporary context* of the landscape”(149).
- 4.3 Potential conflict between cultural heritage and ecological specifications regarding alien plants; need to establish process to resolve conflict (149).
- 4.4 Include “*identification and conservation* of cultural heritage resources”; there’s no reference to conservation of resources, only “nurturing” (149).

- 4.5 With regard to making benefits of cultural heritage conservation available to “surrounding communities”, suggest re-word to “constituent, affected, relevant or stakeholder communities” (150).

Response to Comments on Cultural Heritage Specifications (4.1-4.5)

The cultural heritage specifications set out in Section 2.4 of the draft CDF are sourced from the CPNP Management Policy. CPNP have prepared a provisional heritage resources synthesis map as part of the CDF process and have undertaken to prepare a Heritage Resources Management Plan.

- 4.1 *Noted. This issue will be addressed in the Heritage Resources Management Plan.*
- 4.2 *Noted. The specifications were defined in the CPNP Management Policy; a public process in which the City of Cape Town participated. The CDF is not the appropriate process to amend CPNP Policy.*
- 4.3 *Agreed. The Heritage Resources Management Plan will address this aspect.*
- 4.4 *Noted. See Response B4.2.*
- 4.5 *Noted. See Response B4.2.*

5. Scenic Resource Specifications (Section 2.5)

- 5.1 “Scenic integrity” means different things to different people; it’s a sound ideal but how’s it to be interpreted (123)?

Response to Comments on Scenic Resource Specifications (5.1)

The scenic resource specifications set out in Section 2.5 of the draft CDF are sourced from the CPNP Management Policy.

- 5.1 *Agreed that it is a subjective term. The visual implications of prospective developments at designated sites will be considered where appropriate as part of Environmental Impact Assessments and/or Heritage Impact Assessments as required.*

6. Visitor and User Specifications (Section 2.6)

- 6.1 Improved facilities would have to be paid for by monies collected at entry points. How would this be effected (102)?

- 6.2 Who decides what is “affordable access”, it means different things to different people (102)? Need to take into account inequities in money values of SA residents and tourists (107).
- 6.3 Improved access to facilities and affordability should be included as a principle for redressing imbalances (149).
- 6.4 What is meant by “world-class” service and facilities (116)?

Response to Comments on Visitor & User Specifications (6.1-6.4)

The Park visitor and user specifications set out in Section 2.6 of the draft CDF are sourced from the CPNP Management Policy.

- 6.1 *As explained in Response A3.3, there are a range of Park income sources. However the outsourcing of facility and service provision will lead to the upgrading of visitor sites.*
- 6.2 *Season tickets (Go Green Card) have been introduced to cater for local Park users.*
- 6.3 *Agreed; this is a major thrust of the CDF's proposals.*
- 6.4 *We understand the term to mean standards favourably comparable to those found in other countries.*

7. CDF Planning Principles (Section 2.7)

- 7.1 Planning principles are confusing, some are not principles at all. Once principles have been identified, policies should follow, and then specific proposals should be identified [examples given in comment]. This sequence is not clear in the report (149).
- 7.2 With regard to visitor management, need to take account of the fact that residents will often pass through gates and should not be considered as easy pickings for revenue collection (123).
- 7.3 Request additional principle dealing with no fragmentation of at least the statutory conservation area (144).
- 7.4 (ii)“Biodiversity Conservation”. Amend to “Protect the entire statutory Cape Peninsula’s Nature Area from (further/new/additional) intrusive impacts”; need to protect and modify land use at sites not yet known to be sensitive, irrespective of where they occur (144) [motivation given in comment].

- 7.5 (iii)"The Park Community". Suggest add to first bullet "Where, as a result of the implementation of conservation and development initiatives, individual(s) are disadvantaged or likely to be disadvantaged, steps to mitigate these effects will be proposed by the CDF after consultation with the affected parties" (66) [Background and motivation for the suggestions given, with reference to Millers Point being classified as a 'High Volume Visitor Site' and possible removal of the "park-homes".]

Response to Comments on CDF Planning Principles (7.1-7.5)

- 7.1 *In finalising the CDF, an attempt will be made to avoid confusion.*
- 7.2 *Noted. See Response B6.2.*
- 7.3 *Agreed. See draft CDF, Section 2.7.2.*
- 7.4 *Noted. Given the Peninsula-wide scope of the CDF, the principle has been worded accordingly.*
- 7.5 *Disagree. Mitigation may or may not be necessary depending on specific legal rights of those affected.*

- 7.6 (iii)"The Park Community". Need to see much improved communication between management and the broad community. Agree the need to empower communities environmentally and economically, but subject always to the primary object of conservation and environmental awareness; economic upliftment can't be allowed to detract from environmental imperatives (143).

- 7.7 (iv)"Cultural and Heritage Conservation":
- a. Assumption in this section and (v)"Conservation Planning and Development", that heritage sites can absorb substantial visitor numbers and are not subject to capacity constraints is worrying. Should note as a principle that, as part of EIA or HIA procedures "*capacity constraints which exist with regard to historic sites, will be mitigated by appropriate management procedures and due recognition of the importance of the resource and the limitations of its capacity to absorb visitor impact*" (149).
 - b. Biodiversity principles are possibly not "in contrast to" cultural and heritage conservation principles, but an integral part (151).

- 7.8 (vi)"Visitor Management":
- a. Strong support for accommodating large scale commercial visitor facilities in urban areas, not in CPNP, and for identifying existing structures within the Park for accommodation of visitor facilities rather than "greenfields" development (143, 144).

- b. Principle to place high order, large-scale commercial facilities outside the CPNP should be given higher profile in the draft; should appear in the Executive Summary and be enshrined in the ethos of the CPNP (123).
- c. Use "location" of visitor facilities rather than "accommodation"; latter implies tourist accommodation (149).
- d. Amend bullet "Target cultural precincts...be established *within the framework of protection and conservation of the Park's cultural (landscape) resources*" (149).
- e. Insert new bullet "Conduct EIAs to assess impacts of proposed development" (149).

7.9 (vii)"Park-City Interface".

- a. The Park/Urban Edge discussion needs attention from more than the perspective of use zones and the four principles set out. What of scenic considerations relative to the edge, integrating ecological and cultural heritage and the use zones (147)?
- b. Add bullet "Afford appropriate protection to significant cultural landscapes along the Park/City interface (149).
- c. Why only protect historic rural villages on the eastern escarpment; what about Hout Bay, Noordhoek and others where landscapes are cherished (151)?
- d. All vegetation should be managed, not just alien vegetation (151).
- e. Amend bullet "Integrate fireinterface *being careful to conserve those elements of the cultural landscape essential to the character of the landscape/area, eg Stone pines, oak trees, etc*" (149).

7.10 (viii)"Awareness, Education and Training".

- a. Amend to include natural resources "Raise awareness of and promote community involvement in the understanding of natural resources (biodiversity, ecological processes) and the cultural history relevant to the CPNP (144) [motivation given in comment].
- b. Can't emphasise enough; keep educating the public and increase their involvement in management. Don't feel there's enough attention given to environmental awareness of broad public and users; need to use the depth and wealth of the traditionally involved and concerned community with raising involvement and awareness of the new, previously less involved community which we want to integrate into the Park (143).

7.11 "Legal and Institutional Requirements". Are EIA and HIA the only tools required or are Zoning Scheme amendments needed (149)?

Response to Comments on CDF Planning Principles (7.6-7.11)

- 7.6 *Agreed.*
- 7.7a. *Disagree, no such assumption is made. The necessary EIAs and HIAs, as part of local area planning, will address this concern.*
- b. *Agreed.*
- 7.8a *Noted.*
- b. *Noted; sufficient status is given to this view in the report.*
- c. *Disagree, appropriate tourist accommodation may be necessary at certain visitor sites, as determined through local area planning processes.*
- d. *Agreed.*
- e. *Agreed in the following form: “to undertake, where required, EIAs and HIAs to assess impacts of proposed developments”.*
- 7.9a. *Agreed. Additional principle to read: “Manage the Park – City interface with due consideration to scenic attributes, and an integrated approach to the conservation of cultural and ecological resources.”*
- b. *Agreed to additional principle as proposed.*
- c. *Agreed. Amended principle to read: “Afford protection to historic rural landscapes throughout the peninsula (e.g. Eastern Escarpment, Hout Bay, Noordhoek, etc).*
- d. *Noted.*
- e. *Agree. See Response B7.9b.*
- 7.10a. *Agreed to amend as proposed.*
- b. *Agreed.*
- 7.11 *Zoning Scheme amendments are not required within the Park.*

8. Significance of the Cape Peninsula and Roles of the CPNP (Sections 3.1 and 3.2)

- 8.1 Surrounded by a city, there is industry, international harbour and airport, corporate headquarters, defence headquarters and facilities, etc (143).
- 8.2 Challenge faunal importance of the Cape Peninsula; not aware of any unique fauna in the area (67, 143).

- 8.3 Too little consideration given to the CPNP's unique role as a "leisure for the City dweller" resource (101).
- 8.4 The Park also has a symbolic, spiritual, religious role (151).

Response to Comments on Significance of the Cape Peninsula and Roles of the CPNP (8.1 to 8.4)

- 8.1 *Noted.*
- 8.2 *See World Heritage Site application for details of the unique faunal biodiversity in the Cape Peninsula.*
- 8.3 *Noted.*
- 8.4 *Agreed. Will include reference to the spiritual role of the Park.*

9. Visitors and Users of the CPNP (Section 3.3)

- 9.1 Congratulations for undertaking visitor survey in time for incorporation in CDF (144).
- 9.2 Are survey results truly reflective of the user profile, and were sufficient facts and detail obtained; eg were seasonal fluctuations addressed (143)? How were visitor statistics obtained; regular walkers weren't questioned (102)?
- 9.3 Reference to 4.7 million visitors per year is misleading and out of context. Need to know how many people simply walk in the Park after deducting the high intensity, paypoint areas (67).
- 9.4 Need to appreciate that there are generally no options to private motor cars to access the CPNP at present when evaluating the findings of the visitor/user survey – 87% private motor car; CPNP not on public transport or shuttle routes (150).
- 9.5 "Visitors" gives the impression of people from out-of-town. There is tremendous use of the CPNP by people who live in Cape Town, to the extent that it's so much part of the lifestyle of Cape Town that it could be seen as a "cultural activity" (97).
- 9.6 Perhaps differentiate between "mass" tourism and smaller groups or individual tourists (116).
- 9.7 Should the number of visitors to CPNP include Kirstenbosch visitors; doesn't this skew actual numbers (150)?

- 9.8 The maps on land use and “the plan” seem to underestimate use of the northern portion of the CPNP and usage of the upper table and the southern, western, and eastern slopes by people on foot, horse and bicycle (97).
- 9.9 Uncertainties which should be addressed with traditional users about the future of existing infrastructure on the mountain (107). The Mountain Club of SA currently has the use of a hut close to the reservoirs on top of Table Mountain. There are 3 other huts used by Scouts, Western Province and Cape Province Mountain Clubs; continued use of these huts – most of which have historical value - should be subject of discussion [suggestions given in comment] (140).
- 9.10 Walkers and dog-walkers seem to be grouped together in the profile of local users. Need to produce relevant figures for different areas in the light of treating them differently (Annexure A): How many dogs per person, points of entry, frequency of walking, etc (67).
- 9.11 Implications of lower income groups rating their Park experience lower than higher income groups important. Need to encourage local people to enjoy the CPNP (143); suggest education trails to encourage appreciation of nature and adventure. Silvermine River corridor could play a role (144).
- 9.12 With regard to the popular sites:
- a. Only 7 popular sites reflected on the map and described, but 8 are mentioned in the text (67, 128, 150). Similarly, reference is made to a further 10 sites visited, where 11 are indicated (128, 150).
 - b. Signal Hill should be differentiated from Lion’s Head as they cater for different uses (116). Find it hard to believe that Lion’s Head isn’t one of the popular sites; at full moon up to 700 people visit at one time (146).
 - c. Kloof Nek is a parking and transfer area, not a destination. Suggest rather state that the Pipe Track and/or Lion’s Head are the popular areas, not Kloof Nek parking (140, 146).
 - d. Black dots should have names for clarity (149, 151).
 - e. Section 3.3.2 refers to CPPNE; what’s the significance of the CPPNE to those within it (123)?

Response to Comments on Park Visitors and Users (9.1-9.12)

9.1 *Noted.*

9.2 *Statistically the sample on which the Park visitor survey is based yields results with a margin of error of 2.7% at the 95% confidence level. Over a one-year period the survey was conducted on 500 “count days”, 11 hours per day at 70 points of entry.*

- 9.3 *Reference to 4.7 million refers to visits, not visitors. Information on the number of people who use the Park for walks was provided in Section 3.3 of the draft CDF. Annually, some 2.16 million people use the Park for walks, many of them being multiple users.*
- 9.4 *Agreed. The thrust of the CDF is to address this problem.*
- 9.5 *See draft CDF Section 3.3.1.*
- 9.6 *Noted. A useful suggestion for follow-up surveys.*
- 9.7 *Whilst Kirstenbosch is not managed by CPNP, it is informative to assess its patronage relative to other attractions along the Peninsula mountain chain. Many people access the Park via Kirstenbosch.*
- 9.8 *Future Park visitor surveys will refine the information on visitor usage patterns presented in the draft CDF.*
- 9.9 *SANParks will discuss these issues with the relevant organisations.*
- 9.10 *Whilst the draft CDF did group together walkers and dog walkers in the profile of local users, it is possible to dis-aggregate these sub-groups using the survey data. Overall, dogs were surveyed as being present on 18% of Park visits, but the results vary significantly depending on the area. For example, 60% of walkers in Newlands Forest were accompanied by a dog. All survey data on dog walking will be used to inform the preparation of a Code of Conduct for walking with dogs in the CPNP.*
- 9.11 *Agreed. CDF's priority visitor site actions designed to address this aspect.*
- 9.12a. *Agreed. Confusion arises from Table Mountain Cable Station being illustrated on the map as one site, whereas in the survey the Upper and Lower Cable Stations are recorded as 2 sites. This will be sorted out in final CDF.*
- b. *Agreed; Lions Head to be designated a destination in the final CDF.*
- c. *Agreed. Report will be amended to show that Kloof Nek currently functions mainly as a transit site.*
- d. *Agreed.*
- e. *In establishing the CPNP, the Government mandated SANParks to seek the incorporation of appropriate conservation-worthy land, public and private, within the designated CPPNE, into the CPNP. Public land is proclaimed as National Park through agreement with relevant authorities; private land may be incorporated as a "contractual" National Park on a willing buyer-willing seller basis.*

10. Ecological Considerations (Section 3.4)

- 10.1 Little is said about conservation measures in the report; no mention of elements to be conserved in, or conservation measures in, use zones (149).
- 10.2 With regard to fauna:
- a. Why isn't mention made of the faunal history of the Park which runs as a significant thread through the conservation proposals (67)?
 - b. Explain "several faunal groups exhibit high levels of species richness and endemism" (67).
- 10.3 Path maintenance – in many different areas of the mountain, both in high density recreation areas and on climbing routes [examples given in comment] is essential; CPNP do an excellent job of path making but then leave the finished work to decay (139).
- 10.4 Extensive horse ranches in the Noordhoek valley could be seen as a type of farming. The high concentration of horses has a potential to impact on the wetland biota. The draft CDF doesn't cover these aspects in enough detail (57).
- 10.5 River systems:
- a. Should include "inappropriate hard engineering methods for flood control" to the list of threats to streams, rivers, wetlands (148).
 - b. Should define specific ecosystems which are special or unique; such as Hout Bay River system from mountain crest to estuary/coast [detailed motivation in comment] (145).
 - c. Rivers flowing through urban areas should be considered for Protected Natural Environment status, eg Disa and Silvermine Rivers (144).
 - d. Hout Bay River system, wetlands and catchment should be designated as ecologically sensitive and included on Map 2 (148).
 - e. Noordhoek wetlands should be included as a riverine corridor. The wetlands present some of the most unspoiled lowland coastal fynbos in the peninsula. Papkuilsvlei is described as a "jewel in the valley" and is the best preserved example of this sort of seasonal vlei this side of the Hottentots Holland Mountains (57).
 - f. Wetlands and streams, although recognised as significant, are excluded from areas designated as "ecologically sensitive". CDF should accord urban edge or Protected Natural Environment status to these areas, since green corridors are under pressure to develop (143).

- 10.6 Many primary dunes already built on, many under threat. Would help to conserve remaining primary dunes and associated beaches by giving them some form of protected status (148).
- 10.7 Number of sensitive areas aren't recognised due to prior mismanagement; CDF should have a principle/clause recognising the potential sensitivity of and area (143).
- 10.8 Boundary between the "Urban" zone and the "Quiet" and "Peri-Urban" zones along the green Hout Bay River corridor should be given Urban Edge status in the CDF (148) [motivation included in comment].
- 10.9 Specific plant colonies aren't addressed in the draft CDF (143).
- 10.10 Need educational notices explaining to parents and children that tadpoles are protected and shouldn't be removed from rivers (100).

Response to Comments on Ecological Considerations (10.1-10.10)

- 10.1 *The draft CDF sets out a city-wide spatial framework within Park management will initiate and co-ordinate diverse conservation and development activities. The specifics of these activities is beyond the scope of the CDF.*
- 10.2a. *Faunal history of the Park is beyond the scope of the CDF.*
- b. *See 1994 UCT study, 1996 CSIR study (both referenced in the CDF) and the application for World Heritage Site status for the Cape Floristic Region.*
- 10.3 *Agreed. An ongoing path maintenance programme is being implemented.*
- 10.4 *Agree that draft CDF does not cover in detail the impact of horses on Noordhoek wetlands biota. Suggest that such detail is best addressed in a local area study and not in an overall metropolitan spatial framework.*
- 10.5a. *Noted.*
- b. *Map will be amended.*
- c. *Noted.*
- d. *Map 2 only illustrates ecologically sensitive areas in the CPPNE.*
- e. *Agreed. See Maps 2 and 3.*
- f. *See Response B10.5d.*
- 10.6 *Noted.*
- 10.7 *Agreed. This principle will be incorporated into the CDF.*

10.8 *Noted. Whilst the CDF can make such a proposal, CPNP has no jurisdiction over this land. For planning purposes, the Urban Edge was used as defined in the CMC study.*

10.9 *Beyond scope of CDF.*

10.10 *Noted.*

11. Cultural Heritage Considerations (Section 3.5)

- 11.1 Did the HLG include landscape architects, urban designers and town planners, who would be essential to cultural landscape analysis (149)?
- 11.2 Section is incomplete: deals with identification only, not how significant sites are to be treated in CDF or how criteria and overlapping of criteria increase significance (149).
- 11.3 What criteria are used for including areas as heritage areas, and what's the significance of their inclusion (123, 149)?
- 11.4 The most extensive conservation element, the stone pine layer of analysis which occurs across various zones, is not reflected. This is a serious omission in the cultural landscape mapping (149).
- 11.5 Although the Planning Principles and stance regarding integrating ecological and heritage conservation are admirable, Map 2 raises many questions; conceptual, substantive and procedural. The report is too telegraphic and thin in presenting the argument and there is not enough evidence to support what's advanced (147).
- 11.6 Map 2 is an improvement on the map previously on the CPNP website. But the listing of 29 heritage areas in the absence of a conceptual framework is debatable. What of the cultural icons represented by entire scenes of parts of the CPNP (147)?
- 11.7 Need to cover mining heritage; important that these sites be preserved. Suggest include Hout Bay manganese mine above East Fort, Lakeside Quarry above Boyes Drive, Strand Street Quarry and Vredehoek tin mine above the Disa Park Flats (co-ordinates given) (14).
- 11.8 East Fort Complex is of great interest as a Military Heritage Site; possibility exists of it being incorporated into an "overall solution for Chapman's Peak Drive" by creating a Military Trail from the Castle to Cape Point, featuring amongst others East Fort, West Fort and Apostle Battery (145, 148). The

manganese mine above the Fort and remains of the jetty below, which served the mine, could be included with the Fort as a "Destination" (148).

- 11.9 West Fort is of similar significance to East Fort; should be incorporated into the coastal strip of land running from that point along the coast to Seal Island and ultimately restored provided no insensitive development (145). West Fort should be restored as a destination for visitors and included in the list of Heritage Areas (148).
- 11.10 Could add Kirstenbosch, West Fort (Hout Bay) and Maclears Beacon to list of Heritage Areas (151).
- 11.11 From Map 1 it seems that Miller's Point and Castle Rock are included, but the listing excludes the latter (123). Smitswinkel Bay is included but not Castle Rock; they are both residential in nature but different in character (123).
- 11.12 Concerned that Noordhoek Wetlands aren't noted as heritage/archaeological sites. There are three main sites in the area (details given in comment) and a network of middens and fossil sites in the valley. Trails here should cover archaeological aspects too, not just flora and fauna (57).
- 11.13 Welgelegen burial ground refers:
- a. Burial place of van Reenen and Mostert families and their descendants, on Erf 28002, Groote Schuur Estate, a provincial heritage site, is described under "heritage areas" No 4, Groote Schuur Estate; the cemetery is described as "Rhodes Estate" on Map 1 (4).
 - b. It was reserved for inclusion into the CPNP, so SANParks is responsible for upkeep as from 27/7/00. Concerned about maintenance policy and plan for this erf, and ownership/management of adjoining property where a dam was recently constructed, which appears to be a high volume usage area (4).
 - c. No property boundaries of Erf 28002 Groote Schuur or the servitude described in Govt Gazette 4/4/97 shown on Map 1; require demarcation thereof (4).

Response to Comments on Cultural Heritage Considerations (11.1-11.13)

11.1 *The HLG comprised architects, urban planners, urban historians and archaeologists. They consulted with a multi-disciplinary Reference Group in formulating their inputs to the CDF process, inclusive of all the required skills.*

11.2 *Detail sought by commentator will form part of CPNP Heritage Resources Management Plan, and will be addressed through local area planning.*

- 11.3 *The HLG used the definitions as set out in the National Heritage Resources Act 25 of 1999.*
- 11.4 *Detail sought by commentator will form part of CPNP Heritage Resources Management Plan.*
- 11.5 *Noted.*
- 11.6 *Detail sought by commentator will form part of CPNP Heritage Resources Management Plan.*
- 11.7 *Noted. Will form part of CPNP Heritage Resources Management Plan.*
- 11.8 *An interesting proposal. Should be noted in final CDF, taken up in Heritage Resources Management Plan, and the subject of a local area detail study.*
- 11.9 *Agreed. Will be designated a mixed use site in CDF, although not under CPNP management.*
- 11.10 *Noted. Will be addressed in CPNP Heritage Resources Management Plan.*
- 11.11 *Noted. Will be addressed in CPNP Heritage Resources Management Plan.*
- 11.12 *Noted. Will be addressed in CPNP Heritage Resources Management Plan and through local area planning.*
- 11.13 *Noted. Will be addressed in CPNP Heritage Resources Management Plan.*

12. Opportunities and Constraints (Section 4.1)

- 12.1 Opportunities: The Park provides access for plant enthusiasts and experts to a unique floral environment of global significance (128).
- 12.2 Constraints: It's mainly upper income development pressure for well located land rather than land shortages per se which result in pressure on the mountain (128).

Response to Comments on Opportunities and Constraints (12.1-12.2)

- 12.1 *Agreed. See draft CDF 3.2(v).*
- 12.2 *Noted.*

13. Appropriateness of Use Zones (Section 4.3)

- 13.1 Use zones are appropriate on which to base land use within the CPNP and address City/Park interface issues (101, 107).
- 13.2 Objection to zoning; it is not the task of SANParks to zone private land (125).
- 13.3 Inconsistency between current zoning schemes and proposed use zones is recognised and can be addressed by the Metropolitan Zoning Framework study, a current City of Cape Town initiative (128).
- 13.4 Discussion is problematic and quite inconclusive in dealing with the heritage component. The concepts of zones and experiences leading to permissible activities on the one hand, and spatial frameworks delineating the significant order of organisation of space and place structurally, visually and in terms of relative significance on the other hand, don't mesh easily. A more holistic methodology needs to be devised (147).

Response to Comments on Appropriateness of Use Zones (13.1-13.4)

13.1 *Noted.*

13.2 *CPNP, as the custodian of an internationally significant but fragile conservation area, has the right to put forward proposals for what it sees as sustainable land use along the Park fringes. These proposals do not grant or take away the rights of surrounding property owners. The proposals are included in the draft CDF as the basis for further discussion and debate with surrounding property owners and local authorities. The draft CDF recognises that others may have a different perspective on the topic. The CDF's Use Zones are fundamentally different to local authority Zoning Schemes, as defined in the Land Use Planning Ordinance. The distinction is explained in Section 4.3 of draft CDF.*

13.3 *Noted.*

13.4 *Concern of commentator noted. Suggestions on what is a "more holistic methodology" would be welcomed.*

14. Channelling Visitor Access into the Park (Section 4.4)

- 14.1 The draft CDF looks at the number of visitors to the Park. There are also implications that there are impacts associated with the number of visitors. With most of the CPNP designated as "remote", there will be constraints to human activity. There is a concern that in the longer term there could be alienation of citizens from the mountain resulting from the conservation

ideals. Suggested that an attempt should be made to address the issues of numbers accessing the Park, and what would be desirable in future, if only at a broad level of intent (128).

- 14.2 Challenge assumption that improved access would mean increased use; many disadvantaged people or communities living next to or near CPNP don't use the Park; they are just not outdoor types (116).
- 14.3 Public transport links to CPNP essential to promote access for all user groups; CPNP, local authority and relevant bodies to pool resources around this issue (150). Inadequacies of the public transport system in relation to addressing the needs of the majority of the city's inhabitants, needs to be addressed (128).
- 14.4 With regard to access:
- a. Access permits could be introduced should certain areas become overused (101).
 - b. Access to popular sites (eg Boulders) has been restricted by charging high tariffs not affordable to all; is this the best way to promote sustainable use (150)?
 - c. What about increasing user groups but attaching more importance on a fee system; income generated could be used for job creation (150)?

Response to Comments on Channelling Visitor Access into the Park (14.1-14.4)

14.1 *Acknowledging that the CPNP comprises a largely open access system, the approach to visitor management proposed in the draft CDF is not to define a specific carrying capacity for the Park. The draft CDF advocates the setting of performance standards, or what are also referred to as the "limits of acceptable change", as the means by which to manage visitor numbers. These standards need to be measured and monitored. SANParks will strive to maintain the quality of the remote experience and will investigate ways to reduce impacts, enhance the human experience and maintain the natural and scenic environment in remote areas. Where the limits of acceptable change are exceeded then appropriate remedial action needs to be taken by Park management.*

14.2 *Noted.*

14.3 *Agreed. Should be recommendation of final CDF to inform metropolitan transport planning.*

14.4a. *Noted. See Response B14.1.*

b. *Disagree. Season tickets (Go Green Card) allow for affordable access to locals.*

c. *Noted.*

15. Models for Managing the Multi-Purpose Use of the Cape Peninsula (Section 4.5)

- 15.1 Figure 3 in Section 1.5 indicates that “alternative scenarios” would be used to inform use zones, visitor sites, park/city interface; alternatives aren’t apparent in the draft CDF (150).
- 15.2 Biosphere Reserve: south of Silvermine there’s no room to accommodate the core/buffer/urban zones; the urban edge abuts the core conservation area (143, 144).
- 15.3 How are the administrative mechanisms in various zones and outside the boundaries of the Park to be run and who’s going to set them up (149)?

Response to Comments on Managing the Multi-Purpose Use of the Cape Peninsula (15.1-15.3)

- 15.1 *In the preparation of the draft CDF, a number of Use Zone and Visitor Site alternatives were explored with Park management, staff and the CPNP Planning Steering Committee . All of these iterations are not documented in the draft CDF.*
- 15.2 *Noted.*
- 15.3 *CPNP and the new Unicity (City of Cape Town) are responsible for setting up the required administrative mechanisms and allocating responsibility for their implementation.*

16. Use Zones (Section 5.2)

- 16.1 ***Purpose of Use Zones as a Management Instrument (Section 5.2.2):***
 - a. Agree with management perspective; that management is not about managing the number of visitors but about managing the users and their impacts on resources (140, 146).
 - b. Excessive regimentation of recreational zones would be inappropriate and unpopular [details given in comment] (101).
- 16.2 ***Overview of Use Zones (Section 5.2.4):***
 - a. Don’t believe that Orange Kloof and the lower part of Disa Gorge should be totally off-limits (“restricted access areas” on Map 3). They are ecologically sensitive, but some controlled access, eg by special permit, should be allowed. In particular, access for walkers to Disa Gorge via the jeep track from Constantia Nek is desirable (50).

- b. Hout Bay River “green corridor”, made up of “Peri-Urban” and “Quiet” zones in the lower reaches of the river, shown as much too narrow, less than 50% of total, on Map 3; need larger scale more accurate maps (148).
- c. Suggest introduce a Sport Zone category for Sport Climbing, Paragliding, Abseiling, etc (107).
- d. The Metropolitan Zoning Framework study (CMC Administration initiative) will investigate how these Use Zones can be accommodated (128).
- e. draft CDF states that rock climbing can take place in “Remote” zone; would like confirmation that it could also take place in “Quiet” and “Leisure” zones (eg Lion’s Head sandstone and granite) (140, 146).
- f. In favour of providing signage at entry points and key decision points; signs should be kept to a minimum in remote and quiet zones (140, 146).
- g. Lease areas: Seems to be no reference to lease areas in the CPNP, eg wastewater and waste management, and other management related activities. Such areas should be zoned as such and environmental management standards should be stipulated (140). Need to ensure that lessees comply with CPNP standards and conditions; suggest local authority comments on proposed TOR and conditions for prospective lessees (150).

Response to Comments on Use Zones (16.1–16.2)

16.1a. *Noted.*

b. *Noted.*

16.2a *Agree. Access to Orangekloof by permit arrangement only.*

b. *Agreed. Map will be amended to show correct ‘footprint’ of Hout Bay green corridor.*

c. *Disagree that an additional Sport zone is appropriate, given that the zones relate to the experiential qualities to be maintained in different areas of the Park. What is needed, however, is the demarcation of suitable areas for different sporting activities within the CDF Use Zones, as well as guidelines, codes of conduct and permits where relevant.*

d. *Noted.*

e. *Agree that it could take place in Quiet and Leisure zones. For approved localities refer to Sport Climbing Environmental Management System.*

f. *Noted.*

g. *Noted. These areas are being addressed by the CPNP Infrastructure Management Plan.*

16.3 **Remote Zone (Section 5.2.4i):**

- a. Support access into this zone on foot only (148). Suggest that mountain bikes should not be allowed in remotes zones, even along designated cycle routes, since this activity would be in conflict with the definition and stated objectives of this zone (47).
- b. No mountain bike in this zone except on clearly designated cycle routes (144, 148), with the proviso that public/interest groups are consulted in their designation (148).
- c. Dog walking should be permitted along at least some of the designated cycle routes (148).
- d. Definition seems arbitrary. What is remote about the Western Table or the back Table with all its visitors (67); the back Table is accessed by a wide road (136)? Most of the “remote” areas include areas in which the public presently walk dogs and are well utilised for recreation (75, 89, 136).
- e. How can one keep an area “wild” while encouraging recreational and educational opportunities for thousands of people to visit it (92)?
- f. Should be a “remote” zoning extending from Cape Point to Table Mountain to give effect to an animal migration route (124).
- g. Question whether Fish Hoek to Muizenberg mountain area should be designated as “remote” at the urban interface, since this is arguably a high access area, particularly due to Boyes Drive. In line with what is designated elsewhere (eg Hout Bay) and what is stated in the text, the interface should include a “Quiet Zone” (128).

Response to Comments on Use Zones (16.3)

16.3a. *Noted.*

b. *Noted.*

c. *Noted.*

d. *The Remote Zone is made up of the relatively isolated areas of the CPNP where one’s interaction with other Park users should be significantly less frequent than in the rest of the Park. The area around the Upper Cable Station has been designated a High Intensity Leisure area given the scale of visitors. Their impact is relatively confined to the Cable Station however. It is recognised that there are infrastructural facilities and access roads that intrude into the so-called Remote Zone. Nonetheless management actions should focus on mitigating against their impacts towards the preservation of a sense of remoteness here. The zones represent the desired conditions, not necessarily the current status.*

- e. *The draft CDF proposes concentrating recreational and educational activities in appropriate and accessible designated areas in order to retain some relative remote areas within this Park within a city.*
- f. *Agree that it would be desirable to have a continuous Remote Zone extending from Cape Point to Table Mountain. Unfortunately historical urbanization patterns have resulted in 'islands' of nature areas along the Peninsula. The CDF strives to improve the continuity of ecological systems along the Peninsula and also from the mountain down to the coast.*
- g. *Noted, but debatable. Difficult to define absolutely, but in this area walkers rapidly experience the remoteness shortly after leaving the road.*

16.4 **Quiet Zone (Section 5.2.4ii):**

- a. Endorse the requirement for non-motorised access only (47).
- b. How can criteria "areas in close proximity to urban development" be used to determine if area's a "Quiet Zone" (149).
- c. The sentence "limited and appropriate development in keeping with the natural and cultural qualities of the area" on its own is meaningless. Must demarcate areas suitable for additional development and define "limited, appropriate and in keeping with the natural and cultural qualities" for each demarcated development area to allow meaningful EIAs and participation by NGOs (144).
- d. Amend last para: "From the Park's perspective...new developments of *the above listed facilities that should be provided* in the Quiet Zone. Following...development *to accommodate only the above-mentioned facilities* in keeping with....localities" (149).
- e. Object to Plateau Road/Perdekloof area falling within "quiet" zone; does not reflect the legal zoning, actual use or aspirations of landowners, residents or stakeholders (98, 125). Suggest rather simply map it as "private", or map according to legal zoning, stating the predominant or conditional uses as defined in the Zoning Regulations, or map as "agricultural", since this is the closest fit to the legal zoning [eg Bonne Attente Farm is the oldest farm in the South Peninsula (125)] and best matches the current usage and future aspirations; many members having expressed interest in tourism and related facilities (98).
- f. Why omit the area from Newlands Forest to Cecilia, including Kirstenbosch (67)?
- g. Horse riding and mountain biking: how can they be allowed in this zone, while dog walking is not? Such activities are far more impactful and noisy (105).

- h. The “quiet” zone in the south Peninsula is very small and can’t accommodate these uses without severe negative impact; horse riding and mountain bike trails must be clearly demarcated (144).
- i. Policy on new developments – which encompass a wider range of possibilities - should be applied with care and understanding, and in the spirit of partnership; most of the residents have been part of the heritage for a long time and cherish its beauty (123).

Responses to Comments on Use Zones (16.4)

16.4a. *Noted.*

- b. *Where the Park abuts urban development the Quiet Zone serves as a transitional area between the built and natural environment.*
- c. *What is limited and appropriate development will vary in nature from area to area and needs to be resolved through local area public planning processes.*
- d. *Disagree. Other facilities not listed may be appropriate and will be considered as part of local area planning processes.*
- e. *The CDF’s zoning system is fundamentally different from the local authority Zoning Scheme, as defined in the Land Use Planning Ordinance. See Response B13.2.*
- f. *Newlands and Cecilia Plantations, both modified landscapes, are zoned Low Intensity Leisure areas. Kirstenbosch, accommodating some 600 000 visits a year, is zoned High Intensity Leisure. The areas in between are all Quiet Zones. These zonings we see as being consistent with the zoning criteria set out in the draft CDF.*
- g. *The draft CDF does not propose restricting dog walking in the Quiet Zone, and horse riding and mountain bikes are only allowed along designated routes.*
- h. *See Response B16.4g above.*
- i. *Agreed.*

16.5 Low and High Intensity Leisure Zones (Section 5.2.4iii and iv):

- a. Safety and security perceived to be lacking (116).
- b. With regard to “Low Intensity Leisure”, need to tease out “sympathetic developments”: insert “related to the above-mentioned facilities” (149).
- c. Opposed to concept of tourism development within the “Low Intensity Leisure” zones used by locals; recommend that no tourism facilities be allowed at sites patronised by local users (144).
- d. Perdekloof Picnic Area: Only activities are braaing and activities part of a braai outdoors; not varied types of activities as given in Table 1 (144).

- e. Inconsistency in inclusion or exclusion of parking areas for high intensity leisure zone beaches on Map 3: Hout Bay and Llandudno Parking excluded whilst Noordhoek, Scarborough and Koeel Bay included (148).
- f. Sandy Bay should be designated as a "Quiet" zone and not developed as a "Leisure" zone; plenty of alternative leisure beach sites in close proximity (148).
- g. High intensity areas should be monitored for pollution from litter and sewage to allow effective controls (146).
- h. Need for "rest and bush camps" questioned: seems to be in conflict with findings of visitor and user survey and Management Policy (149).

16.6 **Other Zones (Section 5.2.4v):**

- a. Special Preservation zones excluded from revised Use Zone Map and CDF; how will conservation of special sites, including ecologically significant sites, be catered for (148, 150)?

Response to Comments on Use Zones (16.5-16.6)

16.5a. *Noted*

- b. *Disagree, as other appropriate facilities may be required as determined by local area planning processes.*
- c. *Noted.*
- d. *Noted. The predominant activity will be picnics/braais. The optimum use of existing facilities to be determined through local area planning processes.*
- e. *Only beach parking areas in or immediately adjacent to the Park are included on the map.*
- f. *The designation of Sandy Bay and other beaches under SANParks management as Low Intensity Leisure Zones in no way implies that they should be "developed". The zoning reflects the dominant usage.*
- g. *Agreed.*
- h. *Disagree with the commentator's interpretation of the findings of the visitor survey. "Rest and bush camps" are fully consistent with the ethos of a National Park, provided that they are appropriately sited.*

16.6 *Management of Special Preservation sites (e.g. Boulders, Cape Point) will be treated within the context of local area management plan.*

17. Park Visitor Sites and Access (Section 5.3)

17.1 Table 1:

- a. Need clarity on whether the scale of patronage used to determine the “high”, “medium” or “low” categories in Table 1 used preliminary findings of visitor and user surveys, or was based on estimated future patronage (148).
- b. Surely sites with high habitat sensitivity rating should not have a low/medium priority rating for action (150)?
- c. Sites are identified as cultural precincts but ranked in terms of habitat sensitivity only; some of the most visually and architecturally sensitive sites are thus ranked moderate-low. This approach is challenged. Need to insert additional column rating in terms of cultural sensitivity (149).
- d. Need to develop criteria for rating sensitivity in terms of the overall vision and policy for the Park (149).
- e. Table 1 focuses on the facilities without sufficient indication of an intention to rehabilitate both the natural and changed environment (143).

17.2 Not clear why overnight tourist accommodation is proposed in the “High Intensity Leisure” zone; seems inappropriate in light of visitor and user survey findings. All proposals in draft CDF must satisfy Vision, Policy and Management Plan which arose from the IEMS process (149) [motivation provided in comment].

17.3 Suggest area around Noordhoek office is designated an entry area into Silvermine valley. There are access paths from Kalk Bay/Muizenberg plateau down to this valley and it seems sensible to make this circuit available. The impact on the area would be minimal and locals routinely remove alien seedlings; this relationship should be encouraged (57).

17.4 Anthony Hall Martin said that all required infrastructure would be situated in existing facilities surrounding the park; no new infrastructure would be built within the Park. The public wants to hear that there will be no more facilities built in the Park. All this must be written in law (15).

17.5 Suggest that development at gateways should be limited; informal trading only allowed at major gateways and be strictly controlled (107). Selling of curios and refreshments should only be allowed by licensed persons in specially designated areas (131).

- 17.6 With regard to general management of visitor sites and areas:
- a. Strict penalties or fines should be imposed on speeding motorists in the CPNP (131).
 - b. Adequate parking should be provided away from traffic to make it safer for visitors with young children or dogs or using wheelchairs (101).
 - c. Independently run car guard systems should be encouraged, like at Cecilia Forest, in view of the incidence of theft and break ins (49).
 - d. Should be a row of women's toilets and washbasins with say 3-4 small children's toilets, built in separate areas from men's toilets, with the former in the safest possible position (100).

Response to Comments on Park Visitor Sites and Access (17.1-17.6)

- 17.1a. *The primary ranking of sites was done according to existing patronage patterns, with the exception of the following sites which were identified as having the potential for increased patronage above their current levels: Zoo Site, Tokai Manor Precinct, Millers Point, Lion Battery, Magazine Site, The Glen, Mt Pleasant, Smitswinkel Forest Station, and The Homestead. This aspect will be made more explicit in the final CDF.*
- b. *Priority ratings were determined taking into account the following: natural and built environmental condition, visitor usage patterns and impacts, location, intensity of usage, prior commitments, etc.*
 - c. *The CDF identifies heritage areas and the Heritage Resources Management Plan will rate cultural sensitivity.*
 - d. *Noted. Refer to CSIR report on ecological sensitivity which was appended to the 1996 Use Zone Map in which these criteria are defined. See Response B17.1c for cultural sensitivity ratings.*
 - e. *Noted. See draft CDF 1.2(iii).*
- 17.2 *See Response B16.5h.*
- 17.3 *Noted. Silvermine homestead serves as a regional headquarters and provides for Park management services. It will remain an informal public access point to the Silvermine valley and surrounds.*
- 17.4 *No such undertaking was made. The draft CDF is explicit concerning the establishment of new facilities in the Park (i.e. at existing sites only and where appropriate to the ecological, cultural and scenic qualities of the precinct). In terms of infrastructure it is agreed that it is not desirable to locate new infrastructure in or through the Park.*

17.5 *Agreed.*

17.6a. *Agreed. Where SANParks has this authority.*

b. *Agreed.*

c. *Agreed.*

d. *Noted.*

17.7 Destinations (Section 5.3.2i):

- a. Lion's Head at full moon should be a "destination" (116).
- b. [Section 5.3.2.i] Signal Hill doesn't need toilets as Kloof Nek toilets are 5 minutes away by car (116).
- c. East Fort is given as a low volume destination in Table 1. It would provide an excellent medium volume entry point for the west side of the Constantiaberg-Chapman's Peak range, doubling with its role as a "destination" [motivation provided in comment] (148). If upgraded, and used as a "gateway" it could be incorporated into a heritage trail (145). Chapman's Peak is in the CPPNE; could upgrade East Fort and establish a toll facility as a private/public partnership (143, 145).
- d. West Fort is worthy of development as a destination, would make excellent low volume transit point for a coastal path round the Sentinel to Sandy Bay (148).
- e. Re-think proposals at Boulders (121) [details given in comment].
- f. Problems related to Upper Cableway Station need to be resolved (107).
- g. East Fort should be addressed in the CDF as a Special Site, with community input (143).

17.8 Mixed Use Sites (Section 5.3.2ii):

- a. Range of functions listed includes "accommodation"; accommodation is only offered at Soetwater and none of the other destinations. Is this a typo or proposal? Should be stated that "accommodating visitors" is referring to provision of day facilities not sleeping facilities (149).
- b. CPNP shouldn't even be considering entering the Hotel Industry unless on a separate account and legal entity. However, the metro is short of medium to low cost holiday accommodation which could be located in places such as Smitswinkel bay Forest Station and Perdekloof (67).
- c. [Section 5.3.2.ii] CPNP should acquire Kloof Nek if it's not already part of CPNP (116).
- d. Support detailed assessments for extension of facilities; support notion that high order, large-scale commercial development should be outside the CPNP (123, 143).

- e. Buffels Bay is intensively used; how can it have “unrealised potential”? Any further development would spoil and degrade it (144).
- f. Object to curfew at Rhodes Memorial; should be at 7pm in winter and 8pm in summer to suit Cape Town conditions, not simply in line with all national parks in SA (106).
- g. “Resolving planning issues requires an assessment of context and not isolated sites. EIA and HIA processes provide for reconciliation of ecological, cultural and social imperatives and resolution of planning proposals”. Explain! Experience is that EIAs tend to assess impacts of specific proposals on specific sites; seldom look at context unless planning proposals contain clear, unambiguous guidelines (144).

17.9 Transit Sites (Section 5.3.2iii):

- a. Need to consider that parked cars attract “car guards” or criminal opportunists (116).
- b. Re-open the braai areas of Newlands Forest and Silvermine; charge users for use of the braai and spend it on security; fine litterers (115).
- c. Sandy Bay Nek parking: expansion would facilitate increased leisure use at Sandy Bay (143).
- d. Parking area at Sandy Bay Nek should not be expanded; it’s likely to become a picnic and leisure site in its own right, is on a commanding view point, subject to substantial sand drift. Suggest consider developing a transit parking site lower down on the east side of the ridge near entrance to Kronenzicht residential development (148).

17.10 Leisure Sites (Section 5.3.2iv):

- a. How can a leisure site be contemplated in Silvermine North when elsewhere it’s classified as “remote” (67)?
- b. Not clear whether SANParks is going to manage access to leisure/amenity areas and/or make people pay (149).

Response to Comments on Park Visitor Sites and Access (17.7-17.10)

17.7a. *Agreed.*

b. *Disagree. This is a high volume destination and results of visitor survey indicate that proper toilets are required here.*

c. *Agreed that East Fort has under-utilized potential and that its future is tied to the resolution of re-opening Chapmans Peak. Will be noted in final CDF.*

d. *Agreed. Although West Fort is not under CPNP management, this proposal will be noted in final CDF.*

- e. *Noted.*
 - f. *Agreed.*
 - g. *See Response B17.7c.*
- 17.8a. *To clarify the issue, the draft CDF proposes overnight accommodation at appropriate Mixed Use Sites in facilities that are consistent with the ethos of a National Park. Which of the Mixed Use Sites and what form the accommodation should take will be determined through local area planning processes.*
- b. *Noted. The future of Smitswinkel Forest Station and Perdekloof is subject to local area planning studies.*
 - c. *Kloof Nek is already part of CPNP.*
 - d. *Noted.*
 - e. *Noted. Future subject to local area planning process.*
 - f. *Open pedestrian access here remains. Closure of gate will be reviewed as part of local area planning.*
 - g. *Noted. CDF provides overall Park context and local area planning must consider sites in their surrounding context.*
- 17.9a. *Agree. Only car guards accredited by SANParks are permitted to operate within the CPNP.*
- b. *Silvermine is now open again but Newlands braai area is not within the CPNP.*
 - c. *Noted. Being addressed through local area planning.*
 - d. *See Response B17.9c.*
- 17.10a. *Silvermine North is an existing long established picnic area and therefore designated Low Intensity Leisure.*
- b. *The CPNP is largely an open access system and will remain as such aside from the existing pay points. However, certain facilities and amenities may be outsourced in terms of CPNP and SANParks policy and therefore access to or use of these may incur a charge.*

18. Managing the Park / City Interface (Section 5.4)

- 18.1 Report does not go far enough in formulating practical, achievable measures to realise the CDF, including the holding of the urban edge (151).
- 18.2 Agree with City/Park interface zoning but small scale of the plan precludes evaluation (107).

- 18.3 Strongly support proposals, principles, management objectives, and proposed action programmes (148).
- 18.4 The draft looks only at the urban side of the boundary with regard to managing the interface, except for the last bullet of point 2.7(vii). Should address, immediately within the CPNP, control of vegetation height and type (low burning biomass potential), firebreaks, access (safety and park user movement), linkages with MOSS (128).
- 18.5 Linkages with other initiatives such as the Spatial Development Framework and Scenic Drives Study, as well as future Urban Edge and Zoning studies, should be explicitly recognised (128). The CDF should be an informant for the Unicity (City of Cape Town)'s Structure Plans (124).
- 18.6 CDF is commended for its attempt to integrate its vision with that of MSDF, CMOSS, Urban Edge study and other planning guidelines (143).
- 18.7 The adequacy and appropriateness of the supporting road network to the park should be addressed (128).
- 18.8 Great variability in use around the edge of the park with respect to what it interfaces with is not adequately recognised. The edge includes uniquely different environments; "remote" areas are a lot less remote in some areas than in others. This variability can't be realistically reflected on a map (eg Map 3) but should maybe be covered in the text (128).
- 18.9 Not enough clarity on the relationship between the CPNP and private landowners and the interface zones, and how best to manage (150).
- 18.10 Should be a moratorium on all future developments close to the CPNP. Specific protest against the continued threat to what is soon to be the CPNP by commercial and residential development extending high up on the mountainside in the Hout Bay and Noordhoek (just past Silvermine) areas (37).

Response to Comments on Managing the Park – City Interface (18.1-18.10)

18.1 Noted. Detailing management mechanisms for the Urban Edge is primarily a local authority responsibility and is being addressed by the Ukuvuka Interface Study currently underway.

18.2 Noted.

18.3 Noted.

18.4 Noted. See Response B18.1.

- 18.5 *Agreed. These linkages will be made more explicit in the final CDF.*
- 18.6 *Noted.*
- 18.7 *Noted. CDF will inform metropolitan transport planning.*
- 18.8 *Noted. Variability of the Park's urban interface will be made more explicit in final CDF.*
- 18.9 *Agreed. The draft CDF's Park interface guidelines serve as a point of departure for subsequent discussion and debate with surrounding land owners and the local authority.*
- 18.10 *Noted, but CPNP has no legal mandate to effect this.*

18.11 With regard to Conservation Villages:

- a. Need to define a "conservation village" (150). The term is value-laden and inaccurate; recommended terminology is "historic precinct" (149).
- b. Need to ensure that conservation villages aren't used as an attractive alternative to high income groups (150).
- c. If Scarborough and Muizenberg qualify for Conservation Village status, could Llandudno be considered (67)?
- d. Recommend that Noordhoek should be made a Conservation Village to maintain the rural ambience and allow a more significant green corridor between Silvermine/Noordhoek Peak/Chapmans Peak area and the wetlands. Could provide a good opportunity for urban park management (57).
- e. Hout Bay should be designated as a Conservation Village; contains Kronendal Farm, wetlands and reedbeds, Fishing Community and Fishing Museum, Museum [detailed motivation given in comment] (148).

18.12 No reason to encourage farming activities in the CPPNE, concerned about developing extensive smallholding areas (143).

18.13 Concerned about preoccupation with activities outside the CPNP; heritage conservation principles within the boundaries of the Park aren't being adhered to (149).

18.14 Concerned about the following; transparent, negotiated policy on these aspects of CPNP needed if the privileged few are not to hijack the park:

- a. The creep of agriculture into the CPPNE and beyond the urban fringe; particularly vineyards in Noordhoek, Red Hill area and planned in Fish Hoek at the four-way stop (57).

- b. Private nature reserves becoming the exclusive refuges of the rich and privileged (57).

Response to Comments on Managing the Park – City Interface (18.11-18.14)

18.11a. *Terminology used as defined by City of Cape Town (South Peninsula Administration) as used in the draft South Peninsula Spatial Framework. For example, Scarborough is a long established Conservation Village.*

b. *Noted.*

c. *Noted, local authority responsibility for designation of Conservation Village.*

d. *See Response B18.11c.*

e. *See Response B18.11c.*

18.12 *Noted. Final CDF will make distinction between farming activities inside and outside the CPPNE.*

18.13 *Noted.*

18.14a. *Noted.*

b. *Noted.*

18.15 Table 2 refers:

- a. Much attention is given to the Farming Use Zone; the Urban Zone is at least as important and deserves comparable attention or reference to other initiatives or tools (128).
- b. No mention of farming in the Peninsula Urban Structure Plan (formerly the 1988 Guide Plan); no reason to either encourage or condone potentially harmful farming activities anywhere inside the Nature Area. Even if land's zoned "agriculture" or "rural", rights are negated by constraints of the Structure Plan (144).
- c. Peri-Urban Use Zone, Management Objective (I). Action needed to protect stream corridors, seepage areas and wetlands on the urban edge and in peri-urban areas. Also need stronger control of indiscriminate road and track construction on private and public land in this zone to combat increased access and suburbanisation (151).
- d. Peri-Urban Use Zone, Management Objective (ii), Principle (i): This point is grammatically incorrect and makes it difficult to understand. The urban edge study recommended that extensive residential smallholdings be included inside the edge and primarily agricultural smallholdings be excluded (128). Strange to include smallholdings, farmstalls and rural areas within the urban edge (149).

- e. Peri-Urban Use Zone, Management Objective (ii): Promotion of any area for a use inconsistent with Structure Plan is dangerous; CPNP must identify those business areas where tourism development/cottage industry is suitable as part of this process (144).
- f. Urban Use Zone, Management Objective (i), Containment of the Urban Zone, Action/Programme required (iii): Should refer to containment of residential development and intensification within the urban zone, and specifically the corridors (128).
- g. Urban Use Zone, Management Objective (ii), Forestry of urban-rural linkages. "Forestry" seems inappropriate here (128).
- h. Urban Use Zone, Management Objective (ii) Forestry of urban-rural linkages. Management Mechanism. Should include reference to the Draft Peninsula Urban Edge Study (1999).
- i. Urban Use Zone. Should address a number of other issues, namely (128):
 - Fire protection of buildings and properties along the interface (appropriate materials and planting)
 - Visual considerations to maintain the scenic quality of the interface (appropriate architecture, density, landscaping, location and alignment of roads, orientation).
- j. All use zones referred to in Table 2 could be managed through the zoning scheme regulations and related policies. The Metropolitan Zoning Framework study (CMC Administration initiative) will investigate how this could be achieved (128).
- k. Update responsible party column to be in keeping with the Unicity (150).

Response to Comments on Managing the Park – City Interface (18.15)

- 18.15a. *Noted.*
- b. *Noted.*
- c. *Noted.*
- d. *Noted.*
- e. *Disagree, not the responsibility of SANParks.*
- f. *Agreed.*
- g. *Table should read "fostering", not "forestry". Will be amended.*
- h. *Table should read "fostering", not "forestry". Will be amended.*

- i. Noted.*
- j. Noted.*
- k. Agreed.*

19. Recommendations (Section 6.2)

- 19.1 Need clarity on the process to be followed in future to resolve the key issues identified during this exercise. Would like reassurance that the process would involve public participation and joint problem-solving (140).
- 19.2 Need specific recommendations for action to initiate and implement negotiations with planning authorities and private landowners regarding development initiatives adjacent to the CPNP (148).
- 19.3 Has Setplan received feedback from CPNP after the Response Report was issued in August 2000 after the "previous draft CDF", and how can public access this feedback (105)?
- 19.4 Landowners on the boundaries of the CPNP need to be consulted (116).
- 19.5 With regard to the finalisation of the CDF:
 - a. Will there be further opportunity to give input before the CDF is finalised (86)?
 - b. The Comments and Responses report should be a public document, available for public scrutiny (123, 144).
 - c. The draft CDF should be amended to reflect the comments and responses from Setplan, and then made available to the public for further comment before being finalised and sent to SANParks for approval. Without this step there would be accusations of inadequate consultation (123).
 - d. IAPs who submitted comment should receive a copy of the Comments and Responses Report (67, 86).
 - e. Should use public libraries near the CPNP like Sea Point, Camps Bay, Vredehoek, Kloof Street as sites for providing documents for public comment as City Hall library is difficult (116).
 - f. Suggest lodge a copy of future reports on the CPNP for inspection at the Mountain Club of SA's offices in Cape Town; nearly 2000 members whose input would be valuable (140).
 - g. Marine Incorporation Study should be made available for public comment before finalising the CDF (123).

- h. Should use the CPNP website to communicate the status of the draft/CDF (123).
 - i. Approved CDF should be made available for public scrutiny prior to SANParks' approval process, and public should be encouraged to raise any concerns with SANParks before approval date (144).
 - j. The approved CDF should be made available to the public, who should be advised on how to obtain copies (144).
- 19.6 Please note that a new organisation has formed in the southern South Peninsula representing a majority of stakeholders and landowners; should be consulted in future (98).
- 19.7 The Marine Component should include estuaries, which should be awarded Protected Natural Environment status (143).
- 19.8 Need to draw on local expertise and input from affected communities, not only consultants, to achieve an holistic view (143).
- 19.9 Many of the proposals in the CDF urgently need to be implemented to control inappropriate development. Urge that discussions and negotiations should be initiated as soon as possible with planning authorities so that official planners can be persuaded to take into account CDF principles (148).
- 19.10 A serious effort should be made to involve all recreational users in drawing up and finalising management plans for the various activities covered in the Annexure, before their implementation. The goodwill generated by the effort CPNP has invested in obtaining feedback from the people of Cape Town will be lost if management ignore this feedback when putting these plans into place (50).
- 19.11 Suggest call a meeting of the Friends of Newlands Forest and concerned Forest users to iron out differences between SANParks and public and forming an effective force to report to SANParks on activities of the "real culprits", such as bark strippers, muti gatherers, poachers, etc (100).

Response to Comments on CDF Recommendations (19.1-19.11)

- 19.1 *Noted. The CDF approval process is explained in Response B2.5. Local issues will be addressed through local area planning incorporating public participation.*
- 19.2 *Agreed. Will be included in final CDF.*
- 19.3 *"Towards a CDF Comments and Responses Report" prepared with inputs from Setplan and CPNP. Report available at public libraries and on the Park's website.*
- 19.4 *Noted.*

- 19.5a. *The CDF preparation process was set out in the June 2000 "Towards a CDF" report. The CDF approval process is explained in Response B2.5.*
- b. *Agreed.*
- c. *See Response B19.5a.*
- d. *Copies will be placed in public libraries, on the Park's website and emailed to those IAPs who provided email addresses. All IAPs who submitted written comment on the draft CDF will be notified of the release of the Comments and Responses Report.*
- e. *Agreed.*
- f. *Agreed.*
- g. *To date the Marine Incorporation Feasibility Study has informed the CDF and the intention is for this to be an ongoing interaction.*
- h. *Agreed.*
- i. *Approved CDF will be posted on the Park's website.*
- j. *Agreed.*
- 19.6 *Noted.*
- 19.7 *Noted.*
- 19.8 *Noted.*
- 19.9 *Noted.*
- 19.10 *Agreed.*
- 19.11 *Noted. Should be taken up through the local area forum.*

20. Section 1 of the Activity Guidelines (Annexure A) : Overarching Principles

20.1 General comments:

- a. The guidelines in "Appendix A" are so broad that the Park management can virtually do what it wants (50).
- b. What's the relationship between the main document and the Annexure prepared in 1996 – would these Guidelines form part of the CDF (115).
- c. What about film shoots, squatting, the cableway? No mention made here (116).

- d. Doesn't stipulate procedures for managing recreational activities, who will monitor impacts, deal with problems, etc. Expand Annexure A to explain what is meant with formal management mechanisms (146).
- 20.2 Self-policing refers. Self policing and voluntary compliance is naïve (116, 144). Need visible patrols especially along the urban edge (116); CPNP and its responsible users deserve policing of irresponsible people by management (144).
- 20.3 Integrated Environmental Management Procedures refer. Recent steps at Cape Point (CONCOR turning the information booth into a curio shop and enlarging buildings without public participation, authorisation of building plans or CPPNE permit) undermine commitment to these procedures (144).

Response to General Comments on the Activity Guidelines : General Principles (20.1-20.3)

20.1a *Noted.*

- b. *The activity guidelines do form part of the CDF. Whilst these guidelines serve as a broad basis for undertaking recreational activities in the various use zones, more detailed management programmes and Codes of Conduct are required for each activity as is stated in the Park's management policy (see Objective 6d)ii). SANParks is committed to preparing such programmes and Codes of Conduct, with the interested and affected parties, for each activity on a prioritised basis.*
- c. *These are not considered as user recreational activities.*
- d. *See Response 20.1b above. CPNP policy requires the preparation of specific management programmes and Codes of Conduct for each activity which will deal with these issues which will be undertaken on a prioritised basis.*

20.2 *Agreed.*

20.3 *SANParks is required to submit building plans to the local authority for approval and to obtain relevant CPPNE permits.*

21. Section 5.1 of the Activity Guidelines (Annexure A) : Walking

- 21.1 The definition of walking refers:
- a. Section 5.1 be expanded to cover Running/Jogging for enjoyment, as well as Walking, since they occur on the same paths, roads and tracks (2).

- b. "Walking" includes scrambling, in terms of the definition used (139, 140). Would be useful to differentiate between these two groups, since the scramblers are going off-path (140).
 - c. There are a large number of routes on the mountain which fall between walking and traditional climbing routes, which could be called scrambling routes; people should not be prohibited from using these routes as many give access to the main, traditional rock climbing areas (50, 140). It's possible to identify these routes so they can be adequately monitored; Mountain Club of SA could assist in monitoring and managing (140).
- 21.2 Use of radios, and music, be prohibited in the CPNP (140, 143); radios have been banned for years on the mountain by consensus (107).
- 21.3 Code of Conduct should make reference to the size of groups. Groups should not be so large as to cause a nuisance to other users (2).
- 21.4 The management principles should include education as to potential hazards of walking on the mountain, amongst others:
- a. Eco-friendly signage should clearly mark the main routes, and should include aspects of safety, eg dry weather hazard signs, particularly at the start of the more difficult/remote routes (2, 80).
 - b. Contingency plans should be prepared and included in the management plan; to cover accident, lost persons (etc) (2).
- 21.5 The proposal to restrict walking to designated formal footpaths and/or close off informal tracks is inappropriate (34, 50, 60 141). Reducing the number of paths and restricting hikers to these paths will result in the paths being overcrowded, will take away the wilderness experience and prevent people enjoying the freedom of the mountain (34, 60). Rather treat them in the same way as scramble routes and focus on monitoring and management with assistance from NGOs (141). Is "keep to the paths" to be advice or a rigid rule; if the latter, how will it be enforced? How to distinguish between a road, a path and a track? Who may leave paths and under what circumstances (139)?

Response to Comments on the Activity Guidelines : Walking (21.1-21.5)

- 21.1a. *Agreed. This will be dealt with in the Code of Conduct to be drawn up for walking in the CPNP.*
- b. *Noted. SANParks' official policy remains that walking in the CPNP is on designated footpaths only.*
 - c. *Noted. See 21.1b above.*
- 21.2 *Agreed.*

21.3 Noted. See Response 21.1a above.

21.4a. Agreed

b. Agreed.

21.5 Noted. See Response 21.1b.

22. Section 5.2 of the Activity Guidelines (Annexure A) : Walking with Dogs

SANParks' Response to Comments on the Activity Guidelines : Walking With Dogs (22.1-22.6)

The issue of walking with dogs in the Cape Peninsula National Park has emerged as a significant and complex one in the light of public response to the draft CDF. As can be seen from this report, numerous comments were submitted; some comments were critical of the draft CDF and SANParks, but many provided constructive and useful suggestions as to ways of addressing the issue, in terms of management options for different areas, controls on dog walkers and dogs, a code of conduct, as well as ideas on a way forward.

In response to this effort, SANParks commits itself to undertaking a structured public process during this year, dedicated to addressing co-operatively the issue of walking with dogs in the Park. The objective, as required by the CPNP management policy, is to prepare an environmental programme and Code of Conduct for this popular activity.

People walking with dogs, as well as other walkers, will be accommodated in the Park in areas with different management requirements; options for management could include areas where leashes are required, areas where dogs walk under the control of their owners or dog-free areas. In the interim, until the public process has run its course, the status quo will remain. People walking with dogs in the CPNP are called on to keep their dogs under control at all times, keep them on a leash when and where appropriate, remove dog excrement, and avoid sensitive areas, picnic areas, etc.

This report clearly sets out the comments received - those in support of restrictions, those in opposition to restrictions and the numerous suggestions for controlling dogs. SANParks is committed to taking these issues and suggestions forward in a participatory process involving the key players, so that a workable and long-term solution to walking with dogs in the CPNP can be reached; acceptable to both SANParks and the public.

22.1 Support for Prohibiting or Restricting Dogs in the CPNP

22.1.1 The proclamation of a national park has forced Capetonians to surrender their special perceptions of what the mountains mean to

them and a number of “traditional rights” have had to be foregone in the interests of the Park; dog walkers are only one such group of people. Dog walkers have no rights at present and a compromise on the non-admission of dogs could create a precedent and bestow a right where none was intended (112).

- 22.1.2 Don't believe that dog owners will change their behaviour in the CPNP: dog excrement litters public paths in Newlands Forest; dog owners blatantly ignore rules about dogs in Kirstenbosch (112).
- 22.1.3 The areas where dogs are allowed should be restricted. For example, they should continue not to be allowed on the upper slopes of Tokai Forest (137).
- 22.1.4 Acknowledge that there are people who fear or dislike walking where dogs are present, and that their excrement is a problem (144).
- 22.1.5 Would support a ban on dogs in remote areas (138).

22.2 Opposition to Restricting Dogs in the CPNP

- 22.2.1 Recent authoritarian steps taken towards people walking dogs in parts of the CPNP, and the erection of signs prohibiting dogs in some areas (eg Black Hill) before the CDF has been formalised, despite assurances that policy decisions would only be made after finalisation of the CDF, has caused tremendous groundswell of ill-feeling (105, 115, 129, 141).
- 22.2.2 Statement by CPNP that a specific process would be embarked on to consider the dog issue is most welcome (143).
- 22.2.3 Proposals that all dogs should be on leads at all times, and the impression that the SANParks may severely restrict access for dogs to areas of the mountain (including above the 150m contour line and remote areas), are objected to and challenged (3, 5-13, 16-35, 38-43, 45, 46, 48, 51, 52, 54-58, 60-65, 67-70, 72-90, 93, 94, 100-103, 105, 106, 108-111, 113, 115-120, 122, 126, 127, 129, 130, 132, 134-136, 138, 141, 142, 150). Dog-walking is not mentioned in the activities envisaged for the “Remote” and “Quiet” use zones. Statements by CPNP management that it denies intending to ban dogs from remote areas seem to be at odds with the draft CDF (115).
 - a. Dogs have traditionally and legally been allowed on the public open space of the mountain and should continue being allowed here (9, 20, 38, 40-42, 45, 52, 55, 56, 58, 60, 62, 63, 65, 68-70,

74, 79, 86, 88 89, 94, 103, 106, 110, 115, 118, 135, 144); particularly given the increasingly few alternative areas to walk dogs (11, 27, 31, 35, 79, 85, 113, 127, 142).

- b. Rates and taxes-paying, law-abiding citizens have the Constitutional right to enjoy the natural resources of the area in which they live. Refusing access to dogs or unreasonably restricting such access would discriminate against an age-old activity and take away established rights and heritage (33, 67, 70, 82, 86, 90, 92, 94, 100, 108, 115, 122, 127, 130, 132). SANParks gave a guarantee that access for public would not be restricted, that existing rights wouldn't be taken away (116) and this applies to people with dogs (106, 113, 115). The last thing that's needed is unenforceable, unpopular and unjustifiable bylaws (68).
- c. The reasons for eroding the few liberties that dog-walkers still have are ridiculous (16). Should guard against removing existing practices and rights if they don't impact seriously (143). Surveys and research conducted don't determine whether visitors were accompanied by dogs, it's thus impossible to determine accurately the needs and preferences of visitors and, consequently, management proposals are flawed (132). Why penalise the majority of people to serve the interests of a few (25, 64, 89) or to deny all dogs freedom of movement because of a few isolated incidents (101, 132)? How can it be a "park for all, forever" if access to dog walkers is denied (90, 122).
- d. The guidelines are more appropriate to the management of game parks or game reserves like Kruger, not a unique area set in the middle of a city with 4 million people who rely on it for leisure and pleasure, to escape the city, and recreation, and who have walked dogs on the mountain for many years (3, 21, 35, 63, 65, 72, 74-76, 80, 89, 90, 92, 100, 106, 115, 118, 119, 132, 134, 142, 150). The CPNP is not a wilderness or pristine area; such a purist approach, "eco-fundamentalism" is damaging (45, 109, 118).
- e. With reference to the last paragraph of Section 5.2.2 of the draft CDF, could restricting dog walkers be justified (67)? What sound and scientific justification and/or statistics are there for such action (82, 83, 89)?
- f. Since one of the criteria used to delineate "remote areas" is minimal visual contact with other users, allowing dogs into remote areas won't detract from the remoteness or naturalness (75).

- g. The attempt to classify “walking with dogs” as an activity separate from “relaxation and enjoyment” is inappropriate; many people walk/hike (etc) for enjoyment, with or without a dog (132).

22.3 Motivation in Support of Opposition to Restricting Dogs

22.3.1 *Profile of dog walkers:*

- a. Suburban families today consist of people and their dogs; people keep dogs for exercise, companionship and protection, and dog walking keeps dogs and people fit and happy - one of the essential elements, pleasures and relaxation of Cape Town life is walking dogs on the mountain (16, 22, 25, 28, 35, 38, 48, 58, 62, 63, 72, 73, 84-87, 94, 101, 106, 108, 113, 115, 120, 127, 134, 142, 144); about 75% of walkers and joggers are accompanied by dogs (132).
- b. Most dog walkers are nature lovers who enjoy, respect, commune with and look after the environment, contribute to conservation efforts and support the principle of protecting flora and fauna; they act as “eyes and ears” of the mountain (18, 23, 25, 26, 28, 32, 34, 38, 68, 70, 85, 90, 96, 115, 127, 134, 142).
- c. By far the greatest users of Newlands forest - rough estimate 80% - for walking dogs are women (60).
- d. Most people don’t keep their dogs on a lead as it’s impractical, unreasonable for long periods of time, and detracts from the pleasure and benefits of a walk (21, 31, 62, 83, 138, 141, 143).
- e. The vast majority of dogs off leads are well socialised and trained, under control, friendly and companionable, seldom if ever attack other dogs or people, or damage the environment (6, 10, 12, 21, 23, 25, 27-36, 40, 51, 52, 62, 63, 70, 72, 74, 77, 78, 80, 82, 85, 89, 94, 101, 103, 105, 108, 109, 111, 113, 115, 117, 127, 129, 134, 136, 143).

- f. Survey of dog walkers undertaken on 2nd and 3rd weekend in December 2000 (86) [Details provided in comment.]

Cecilia and Constantia Nek:

- 70% of walkers from Constantia Nek and Cecilia Forest had at least 1 dog with them.
- At least 80% of dogs were off leads.
- No dog fights or bad behaviour noted.
- Less than 10% objected to dog walking on the mountain, mainly because of fouling.

Tokai:

- Most people are either dog walkers or horse riders.
- Nearly everyone was pro-dog.
- All dog owners and individuals felt that dogs should be off leads but under control.

Silvermine:

- 10% of individuals objected to dogs on the mountain, and 10% neutral or undecided.
- 80% in favour of dog walking on the mountain.
- All dog owners and individuals felt that dogs should be off leads but under control.

22.3.2 ***Security:***

- a. Dog walking is synonymous with “protection” (136): Dogs are a deterrent against attack and provide security, particularly to the elderly and women (8, 16, 19, 24, 32, 33, 36, 60, 62, 73-76, 83, 86-89, 96, 101, 103, 113, 115). For people in wheelchairs or similarly challenged, dogs are relied on for protection (22). Given the current security problems, it’s more important than ever to have dogs for protection (3, 6, 16, 17, 19, 20, 22, 27, 29, 33, 51, 52, 55, 57, 58, 60, 65, 68-70, 77, 78, 80, 88, 94, 100, 102, 106, 107, 111, 116, 118, 119, 127, 129, 132, 135, 142, 144, 150); SANParks don’t have the capacity to patrol the mountain and make it safe (74, 94, 100). Since women seem to be the predominant users, their needs should be given special attention (60).
- b. The best deterrent to criminal activity is the presence of hikers, particularly with dogs; effectively the network of hikers that spreads over the mountain daily provides the conservation authority with free patrols against criminal elements (68).

22.3.3 **Problems with dogs on leads:**

- a. Dogs on leads often have behavioural problems, are often territorial and aggressive (6, 10, 12, 21, 30, 36, 61, 64, 70, 72, 74, 77, 78, 88-90, 93, 96, 109, 111, 113, 117, 132, 134) and it's widely agreed that dogs behave better off a lead (101, 105, 106).
- b. Dogs on leads don't get enough exercise, may be unhealthy and unfit; insufficiently exercised dogs are a nuisance to the neighbourhood and often have behavioural problems (6, 10, 12, 16, 27, 28, 60, 74, 86, 101, 113, 115, 132, 134); can't replace exercise on the mountain with suburban lead-led walks (142).
- c. On steep and rough terrain, dogs on leads can be dangerous and may cause owners to fall or lose their balance (3, 17, 32, 51, 70, 72, 76, 88, 89, 111, 132, 136, 144). Large dogs can cause back problems in owners through sustained pulling on leads (20).
- d. Dogs on leads have no choice but to defecate within the range of the lead and can't go off into the bush where people don't walk and where faeces biodegrade (105).

22.3.4 **Dogs causing environmental damage:**

- a. Dogs do little – if any – damage to vegetation and fauna if reasonably controlled by their owners; dogs and the average dog owner cause less damage and litter less than most casual human visitors who litter and cause fires and erosion, bark strippers, rock climbers, cavers, poachers, graffiti artists, bicycles or exotic invasive plants (3, 13, 16, 18, 19, 20, 23, 25, 30, 32, 33, 40, 41, 61, 64, 70, 72, 75, 79, 81, 82, 84, 85, 88-90, 93, 96, 101, 103, 105, 108, 111, 115, 117, 118, 120, 122, 127, 132, 136, 144). What scientific evidence is there that dogs disturb flora? (21, 32, 83, 127); they could equally act as efficient seed dispersers (83).
- b. Dog walkers should not be penalised for the few isolated incidents that could be caused by stray, roaming or unaccompanied dogs (17, 82, 89, 94, 115, 132).
- c. Need to weigh up the minimal amount of damage done by dogs with significant security and other consequences of banning dogs (102).
- d. What about the damage to fauna caused by domestic cats (116)?

22.3.5 **Consequences of restricting or prohibiting dogs:**

- a. Loss of the pleasure of walking with dogs would mean loss of independence, decline in health and fitness of owners and dogs (19, 38, 46, 62, 95, 101, 132). By denying dogs access to the mountain you are denying the people of Cape Town access to the mountain, and robbing them and their dogs of one of their main – and few – sources of pleasure (22, 24, 31, 35, 46, 52, 62, 63, 77, 78, 83, 84, 90, 95, 103, 113, 115); forbidding people walking with dogs in “remote” areas would prevent them enjoying most of the popular hiking routes in natural areas (89, 113). Ban dogs in the CPNP and one might as well ban ownership of dogs within the city limits (28); would create a miserly and ugly city in the name of correctness (119).
- b. Many people – especially single women - would be reluctant and scared to walk without their dogs, and would thus be deprived of the great pleasure of walking on the mountain (23, 26, 32, 48, 68, 74, 75, 77, 78, 83, 88, 89, 113, 129).
- c. The loss of regular exposure of dog walkers to, and consequent attachment to the mountain could lead to apathy about its future (115).
- d. It’s a concern that people who help conserve the mountain could find themselves effectively banned from that mountain (18, 23, 32, 96, 127). Volunteers who help clear alien vegetation in the CPNP might, if dogs are banned, choose to walk dogs elsewhere rather than go hacking (3, 29).
- e. Could generate immense ill will towards the conservation authorities which would be a great pity and detrimental to conservation (68); could alienate the community and future generations which would be counter-productive to the CPNP (88, 115).
- f. Wheelchair bound people would effectively be denied access to the mountain and a form of challenging recreation (22).
- g. Criminals would be favoured at the expense of law-abiding dog walkers; serious crimes go undetected whilst petty crimes are enforced on the generally law-abiding citizens (33, 68, 100, 115). SANParks would be liable for any and all damages resulting from muggings (69). Some people would feel it necessary to buy guns to protect themselves as a consequence (111).
- h. Unreasonable rules and regulations will encourage law-abiding citizens to break the law (68, 74, 105, 111); don’t believe such

regulations could be enforced (76, 138) and enforcement would be very expensive (111).

- i. All legal options would be explored to reinstate rights to walk dogs on the mountain, a civil defiance campaign would be initiated which would force law enforcement officers to choose between jailing senior residents who refuse to obey such regulations and to pay any fines for so doing, and giving up trying to enforce unjust laws (45).
- j. The vast number of dog walkers who feel dogs should be allowed on the mountain under strict control will insist on a survey of dog walkers if restrictions are imposed (86).

22.4 Suggestions for a Way Forward on the Dog Walking Issue

- 22.4.1 CPNP should concentrate on significant issues like erosion, aliens, poaching, crime, safety, lack of information, etc, rather than dog walking (86, 101); regulation of dog walking should focus on ensuring that dogs are accompanied, controlled and don't constitute a nuisance to other people or animals, not on restricting their movement on the mountain (130).
- 22.4.2 Need a survey of dog walkers, with proper statistics, both in winter and summer (67, 86), to obtain an accurate breakdown of user groups – the number of dog walkers should determine the size of the proposed areas to be allocated to them (93, 101).
- 22.4.3 Need meetings with public, dog walking fraternity and dog clubs, and to appoint a representative committee of stakeholders with whom the Park could communicate (67, 72, 75, 79, 101, 105, 106, 120). Befriend the dog-walking community (115).
- 22.4.4 In terms of the National Parks Act, could introduce regulations to allow dogs in the CPNP (144).
- 22.4.5 A code of conduct for dog walkers should be an integral part of a permit system for dog walkers (144). Dog trainers could help draw up such a code of conduct (143, 144).
- 22.4.6 The draft CDF admits dogs as a “concession”; the rights to walk dogs in the CPNP must be entrenched (101).

22.5 Suggestions for Controlling Dogs, a Code of Conduct

- 22.5.1 Need clarity on differences between a “lead” and a “leash”, the latter is believed to be correct in this context (136). Need clarity on the difference between “dogs should be on leads” and “a leash should be used at all times” (6).
- 22.5.2 Introduce a licensing, permit or pass system for dogs as a way of controlling access (23, 33, 38, 54, 57, 76, 79, 80, 82, 84, 87, 89, 100, 108, 115, 136, 143, 144) involving clear forms of identification for the dog - such as a name tag and contact phone number (100, 136) – and for the dog walker (144); money could be used for management as appropriate (76, 79) or to fund environmental education (143), if the costs of running such system don’t outweigh the benefits (82). Could register each offence against the permit and not renew permits after a number of offences or complaints (33, 100, 136). Also, could issue permits only to dogs up to date with vaccination certificates, especially rabies (33, 54, 101, 115).
- 22.5.3 Encourage Unicity to re-introduce dog licensing to control the number of “wild” dogs, and maintain the city park’s to reduce the concentration of dogs in CPNP (115).
- 22.5.4 Could consider limiting the number of dogs per owner to two (101, [“points to ponder” given in comment], 143, 144); not in packs eg maximum of 8 (150); need flexibility in setting limits on numbers of dogs per person since more dogs give greater security (78).
- 22.5.5 Dogs should be kept under control, supervised, and subject to a code of conduct at all times (6, 12, 17, 21, 22, 28, 32, 34, 36, 39, 46, 52, 55-57, 63, 72, 77-79, 83, 84, 86, 89, 101, 132, 136, 141, 144), but not necessarily on a lead.
- 22.5.6 Dog owners should always carry leads, and dogs should only be required to be leashed:
- a. When traversing high intensity leisure areas (21).
 - b. When passing through picnic/braai areas (21) (23).
 - c. When passing through transition areas like car parks and forest stations (21, 101).
 - d. When fauna are present (eg Rhodes Memorial) (21).
 - e. When horses are present (eg Tokai Forest) (21).
 - f. When asked to do so by a CPNP official or member of public (21, 101).

- g. If dog cannot be controlled without a lead and/or is vicious or dangerous (21, 86).
 - h. In extremely sensitive areas (16, 23).
 - i. In areas deemed “remote” (57).
 - j. In designated areas not covered by the above (21).
 - k. When crossing roads or in areas where there is vehicular traffic (30).
 - l. For safety reasons (51).
- 22.5.7 Dogs and their owners should give way for all other users (137).
- 22.5.8 Introduce legislation to deal with pack dogs who chase buck and vicious dogs who bite other users and their pets (63), spot fines for owners whose dogs damage the environment (33); unsupervised dogs need to be “dealt with” (72, 94).
- 22.5.9 Should provide a map to dog permit holders, clearly demarcating dog walking areas, dog free areas and leash free zones (143, 144).
- 22.5.10 Support Code of Conduct regarding responsibilities for dogs and accidents/injuries (21, 27, 75, 101). However, owners would be responsible for injuries under common law, so no regulations are needed by SANParks (106).
- 22.5.11 Taps and water troughs would be welcome (21, 51, 63, 136). However, they aren’t necessary as most areas have enough water in streams and responsible owners should carry water (75, 101, 106, 116, 132, 143).
- 22.5.12 Need to keep records of dog fights, damage, attacks or complaints, to allow thorough investigation, sound ‘blame’ and appropriate action (101, 115).
- 22.5.13 Owners should be responsible for cleaning up after pets on pathways; suggest signs and heavy fines for people who don’t clean up after their dogs (5, 16, 21, 23, 27, 28, 51, 72, 75, 79, 86, 89, 100, 101, 103, 105, 117, 134). Faeces off paths are broken down rapidly (72, 89, 103, 105, 113).
- 22.5.14 Garbage bins should be made available for dog droppings, within 100m from the parking areas, to encourage walkers to clean up after their dogs (5, 86, 89, 100, 115, 136); also strategically placed strong plastic bags to enforce cleaning up (100).

- 22.5.15 Should have more rangers or field staff, accessible to the public, amongst others to check on dog behaviour and enforce dog owner behaviour especially during peak times and along popular routes (62, 72, 100, 103).
- 22.5.16 Need education of the public and dog walkers, not regulation (75, 76, 86, 100, 101). Guidelines, code of conduct, or regulations regarding dog walking should be prominently displayed at access points (72) or made available to walkers in the form of attractive leaflets (115).
- 22.5.17 Should bring dog walkers on board as they could help – and would enjoy helping - manage the mountain, enforce the existing controls and report any problems to management (68, 70, 72, 79, 115, 129). Community organisations could help police dog walking to protect entitlements in particular areas (148).
- 22.5.18 Need agreement between private landowners and CPNP regarding policy on dogs; should secure co-operation of hikers with dogs in the area, not their hostility (129).

22.6 Suggestions for Dog Walking Areas

- 22.6.1 Dog free, leash-free and leash-only areas for dog walking should be demarcated in the CDF (144).
- 22.6.2 Specific areas of the CPNP should be designated for dogs to run freely and get exercise, provided that owners control their dogs off a lead (3, 5, 6, 7, 12, 28, 52, 53, 76, 105). The following traditional dog walking areas, at least, should continue to be allowed for walking dogs off a lead: Newlands Forest (5, 6, 12, 46, 76, 82, 101, 105, 138), Cecilia Forest (6, 12, 31, 46, 76, 105), Rhodes Memorial Estate (105), Silvermine (6, 12, 46), Noordhoek beach (57, 76), Kalk Bay Mountains (105), Tokai (138), including the major routes above the 150m contour (105).
- 22.6.3 No need to keep dogs out of remote areas; dogs should be allowed wherever walking is permitted in the CPNP on official public footpaths (21, 61, 135), on most of the mountain including the Front Table and the bulk of the Back Table (68) with the exception of core conservation areas like Cape of Good Hope Nature Reserve and Orange Kloof which have always been restricted areas (32, 42, 51, 57, 68, 76, 89, 90, 118, 126, 141, 144).
- 22.6.4 Distribute dog walkers as widely as possible to limit damage; don't confine to limited areas (115). If insufficient walking zones aren't

provided for walkers with and without dogs there'll be an over-concentration of people (101), "like wild animals caged in a zoo" (105). Unacceptable to restrict dog walking to plantation areas (115).

- 22.6.5 Accepted that there should be regulations controlling dogs in the CPNP (17), that dogs should not damage particularly sensitive areas (16, 27, 56) and will be excluded from high risk or ecologically sensitive areas (101), through appropriate steps (106). Clear guidelines and criteria should exist why dogs should not be allowed in certain area, and these areas should be identified; it's not sufficient to state that dogs "only allowed in designated areas" (21).
- 22.6.6 Areas designated for free-running dogs should exclude established picnic, braai and group recreation/function areas (7, 51, 144), and demarcated indigenous areas (107). They could easily be accommodated in disturbed landscapes (52), plantation or semi-plantation areas (107) and high activity areas (138).
- 22.6.7 Should look into areas for combined dog walking and mountain biking, eg Silvermine and Red Hill (75).
- 22.6.8 Should be allowed along designated routes in both the "Remote" and "Quiet" zones around Hout Bay, since no Low Intensity Leisure zones around Hout Bay for dog-walkers (148).
- 22.6.9 Provide short routes on smooth wide roads in the lower forest for old people and families with small children where dogs must be leashed (115).
- 22.6.10 Should consider making a percentage of campsites and overnight trails open to dogs so that dog owners can enjoy such facilities (113).

23. Section 5.3 of Activity Guidelines (Annexure A) : Braaing

- 23.1 Why no entry fee to braai areas, especially since one is proposed for picnic areas (116)?
- 23.2 No braaing, gas braaing, use of gas or any other stoves, except in specially demarcated areas (131).
- 23.3 No music should be allowed in these areas (144).

- 23.4 Why determine opening and closing times; don't become overly regulating. Can't we be more innovative; involve volunteers to ensure security (143)?

Response to Comments on the Activity Guidelines : Braaing (23.1-23.4)

- 23.1 *The introduction of a nominal charge for braaing in open access picnic areas is being considered at certain sites through appropriate public consultation, as a means to provide additional braaing opportunities under managed conditions.*
- 23.2 *Agreed. This is the current policy.*
- 23.3 *Agreed. This is the current policy.*
- 23.4 *Noted. Innovative management mechanisms need to be tested in upgrading picnic and braai areas.*

24. Section 5.7 of Activity Guidelines (Annexure A) : Concerts

- 24.1 Keep out of CPNP as there are numerous venues outside the park available (116).
- 24.2 Criteria for designation of concert sites are too sparse. Size of venue must be controlled, carrying capacity of the venue must be considered. Concerts should not be allowed where noise pollution could impact on "remote" or "quiet" zones (144).

Response to Comments on the Activity Guidelines : Concerts (24.1-24.2)

- 24.1 *Noted.*
- 24.2 *Agreed.*

25. Section 5.9 of Activity Guidelines (Annexure A) : Hang-gliding and Paragliding

- 25.1 Should include radio-controlled aeroplane flying here (116).
- 25.2 No vehicular access, and protection against soil erosion and trampling at take-off sites essential (116).

Response to Comments on the Activity Guidelines : Hang-gliding and Paragliding (25.1-25.2)

25.1 *Agreed.*

25.2 *Agreed.*

**26. Section 5.10 of the Activity Guidelines (Annexure A) :
Horse Riding**

26.1 Suggest modify code of conduct; horses shouldn't be the ones to give way. It should be a mutual understanding between users that they respect each other and give way (137).

Response to Comments the Activity Guidelines : Horse Riding (26.1)

26.1 *Noted. The detailed management programme for horse riding will address this concern.*

**27. Section 5.11 of the Activity Guidelines (Annexure A) :
Mountain Biking**

27.1 Mountain bikers should be allowed in the following areas using existing tracks: leading off Signal Hill, including those at the Noon Gun establishment; jeep track up Karbonkelberg; Black Hill between the crown of the Sun Valley-Glencairn Pass and Red Hill, possibly create a single link track from Plumb Pudding Hill in Rhodes Memorial to the road south of the Devil's Peak Forest Station. Such routes could allow commuters to ride off road for long stretches of the Peninsula which would be a big tourist draw [details and map provided in comment] (99).

27.2 With reference to Map 5 and Section 5.2.4 (Use Zones), felt that tracks which have been used for decades are now forbidden, and suggestions for a trail from Signal Hill to Clovelly or Black and Red Hill are cut by areas excluded from mountain biking (99). Object to any restriction on mountain biking beyond those historically in place (106).

27.3 People already cycle through the Glen; want to improve the path and curb damage. [Proposal has been circulated] (104).

27.4 No bike racing should be allowed (116).

- 27.5 Could charge an annual permit for mountain bikers to cover costs of erosion management (106, 116).
- 27.6 Single track biking is preferred to use of jeep tracks (106).
- 27.7 Current use and proposed sharing of paths not acceptable; should establish separate paths away from pedestrian use. If sharing is continued, need to restrict group numbers and grant right of way to those on foot (150).
- 27.8 What about having mountain bike patrols; cycling fosters better relations with other users [proposal has been circulated] (104).

Response to Comments on the Activity Guidelines : Mountain Biking (27.1-27.8)

- 27.1 *Noted. The detailed management programme for mountain biking will address this aspect.*
- 27.2 *Noted.*
- 27.3 *Disagree. Only limited support and significant opposition to mountain biking was expressed in the public consultation process for the Glen local area planning study.*
- 27.4 *Agreed.*
- 27.5 *Noted. To be addressed in the detailed management programme for mountain biking.*
- 27.6 *Noted. To be addressed in the detailed management programme for mountain biking.*
- 27.7 *Noted. To be addressed in the detailed management programme for mountain biking.*
- 27.8 *Agreed. To be addressed in the detailed management programme for mountain biking.*

**28. Section 5.13 of the Activity Guidelines (Annexure A) :
Orienteering**

- 28.1 Agree that orienteering is more appropriately carried out in disturbed and quiet areas; commercial forest plantations make more challenging routes than open fynbos. However, access to the few remaining plantations has become increasingly difficult (eg Newlands Forest). Park management should make an efforts to consult with orienteering clubs about appropriate areas (50).

Response to Comments on the Activity Guidelines : Orienteering (28.1)

28.1 *Agreed. The detailed management programme for orienteering will address this aspect.*

**29. Section 5.15 of the Activity Guidelines (Annexure A) :
Rock Climbing**

29.1 Classification too broad: climbing encompasses activities from easy scrambles and mild rock work to skilled and demanding climbs (139).

Response to Comments on the Activity Guidelines : Rock Climbing (29.1)

29.1 *Agreed. The detailed management programme for rock climbing, such as the Sport Rock Climbing environmental management system, will address this aspect.*

**30. Section 6 of the Activity Guidelines (Annexure A) :
Activities that Should Not be Permitted**

30.1 General Comments:

- a. No smoking except at designated areas (107); no matches or lighters (116).
- b. No downhill (Red Bull) runs on Kloof Nek Road (131).
- c. No commercial filming to be allowed (131).
- d. Endorse the requirement that no vehicular access be allowed into Remote and Quiet Zones. In line with this requirement, it is suggested that motorised para-gliding should not be allowed in the CPNP (47).
- e. No model plane flying, as currently allowed at Rietvlei Bird Sanctuary and Signal Hill (131).

30.2 Overflying of Aircraft:

30.2.1 Helicopter flights:

- a. Need to regulate helicopter activities for tourist and maintenance purposes, excluding rescue or emergency flights (150).
- b. Helicopter flights should be stopped in remote or quiet areas of the Park. Should be an offset of 2-5km from the mountainside

to reduce noise levels caused by echo and reverberation off the mountainside. Tourist helicopters aren't able to meet the National Parks Act' Regulations when they cross the mountain as they are required to fly more than 500m above ground level, which puts them into the flight space of jet aircraft where helicopters aren't permitted. Despite breaking the regulations, helicopters overfly the mountain all along the mountain chain to Cape Point, in summer involving 4-8 flights a day. Sound levels directly overhead increase from about 40dBA by 15-20dBA which meets the legal criterion of a noise disturbance (53).

- c. Number of helicopters overflying at any time should be controlled; hours should be negotiated with local users to coincide with times when few people are on the mountain (107, 140).

30.2.2 Need to specify no overflying by aircraft, including micro-lights and helicopters (116) below 500m above ground level (107, 140).

30.2.3 Should create 2 [-3] categories of overflying (53):

- a. Flights allowed : emergency services, fire control and CPNP management.
- b. Overflight banned, ban enforced, and 2-5km horizontal offset from CPNP boundary to reduce noise : tourism, commercial and private aircraft.
- c. [Overflight allowed : High flying jet aircraft to observe Civil Aviation Authority Regulations.]

Response to Comments on the Activity Guidelines : Activities that Should Not Be Permitted (30.1-30.2)

- 30.1a. *Agreed, but impractical to enforce.*
 - b. *Noted. Approval is a local authority responsibility and is subject to necessary Environmental Management plans being approved.*
 - c. *Disagree. Commercial filming is permitted subject to stringent permit conditions and on site environmental monitoring requirements.*
 - d. *Noted.*
 - e. *Noted.*

30.2.1a. *Agreed.*

b. *Noted; SANParks is committed to pursuing this issue with the Dept of Civil Aviation.*

c. *Noted.*

30.2.2 *Agreed.*

30.2.3a. *Agreed.*

b. *Noted, but cannot be enforced given current regulations.*

c. *Noted.*

Addendum 1

LIST OF INTERESTED AND AFFECTED PARTIES WHO SUBMITTED WRITTEN COMMENT ON THE DRAFT CONSERVATION DEVELOPMENT FRAMEWORK AND ASSOCIATED MAPS

List of Interested and Affected Parties who Submitted Written Comment on the Draft Conservation Development Framework and Associated Maps

| Ref No | Party | Organisation/s Represented | Enclosures |
|--------|--|--|---|
| 1. | Cathy Salter-Jansen | <input type="checkbox"/> Simon's Town Museum | |
| 2. | Chris Goldschmidt | <input type="checkbox"/> Western Province Athletics (Cross Country and Road Running) <input type="checkbox"/> Celtic Harriers Club <input type="checkbox"/> Cape Runners Against Gravity | |
| 3. | CM Merry | | |
| 4. | PM van Renen for van Re(e)nen and Mostert families | | <input type="checkbox"/> Letters to Miss van Renen: <ul style="list-style-type: none"> • Letter 28/7/00 Dept Public Works • Letter Dept Public Works & Land Affairs, 12/11/90 • Letter SAHRA, 24/10/00 <input type="checkbox"/> Article "Amid the Noise and Haste", Alumni Spring 1984 |
| 5. | Hazel Hill | | |
| 6. | Patricia Jeffery | | |
| 7. | Timothy Teale | | |
| 8. | Lita Jansen | | |
| 9. | Pam Merry | | |
| 10. | Julie Tobiansky | <input type="checkbox"/> Cape Province Dog Club | |
| 11. | Maryna Giliomee | | |
| 12. | M Gawith | | |
| 13. | Michael Wolfson | | |
| 14. | Doug Cole | | |
| 15. | Edward Tilanus | | |
| 16. | J Sandell | | |
| 17. | Alan Lighton | | |
| 18. | Marie Knight | | |
| 19. | Christine Carter | | |
| 20. | R Perl, Simon Perl, Mark Perl and A Weiner | | |
| 21. | Chris Goldschmidt | | |
| 22. | Anthony Koeslag | <input type="checkbox"/> Wheelchair hikers | |

**List of Interested and Affected Parties who Submitted Written Comment on
 the Draft Conservation Development Framework and Associated Maps
 (continued)**

| Ref No | Party | Organisation/s Represented | Enclosures |
|--------|-------------------------|--|------------|
| 23. | Bill Orton | | |
| 24. | S Bielen | | |
| 25. | Dagmar Davidson | | |
| 26. | J Rusconi | | |
| 27. | M. Heald | | |
| 28. | Lianda Martin | | |
| 29. | Ann Hillier | | |
| 30. | JT Hund | | |
| 31. | GM Walsh | | |
| 32. | Brian and Barbara Blyth | | |
| 33. | Marguerite E Bond-Smith | | |
| 34. | J De Gendt | | |
| 35. | Johan Koeslag | | |
| 36. | Ann Koeslag | | |
| 37. | Gerard Waterwitch | <input type="checkbox"/> Environmental Affairs for the First Nation Indigenous People of Southern Africa | |
| 38. | Chris and Elaine Walker | | |
| 39. | Vonna Hermans | | |
| 40. | H Begg | | |
| 41. | Erlank | | |
| 42. | Petition | <input type="checkbox"/> Signed by 6 individuals | |
| 43. | Petition | <input type="checkbox"/> Signed by 9 individuals | |
| 44. | Jeff Goy | | |
| 45. | George Ellis | | |
| 46. | Pauline Hall | | |
| 47. | Piet Erasmus | <input type="checkbox"/> Kommetjie Residents' and Ratepayers' Association | |
| 48. | R Connacher | | |
| 49. | Geoffrey Neden | | |

**List of Interested and Affected Parties who Submitted Written Comment on
 the Draft Conservation Development Framework and Associated Maps
 (continued)**

| Ref No | Party | Organisation/s Represented | Enclosures |
|--------|--------------------------|---|---|
| 50. | CL Merry | | |
| 51. | Peter JS Bacon | | |
| 52. | Roger Jeffery | | |
| 53. | JE Myers | <input type="checkbox"/> Fernwood Residents Association | |
| 54. | Sue Gouw | | |
| 55. | A Dunn | | |
| 56. | ATR Berry | | |
| 57. | Glenn Ashton | <input type="checkbox"/> Noordhoek Environmental Action Group | |
| 58. | Sally Louw | | |
| 59. | David Daitz | <input type="checkbox"/> Western Cape Nature Conservation Board | |
| 60. | DM Carter | | |
| 61. | C Myerson | | |
| 62. | Sylvia Hammond | | |
| 63. | Janet Holwill | | |
| 64. | Sue Liell-Cock | | |
| 65. | Philip Rosenthal | | |
| 66. | Mike Jesson | <input type="checkbox"/> Millers Point Homeowners' Association | |
| 67. | Neil van der Spuy | <input type="checkbox"/> Llandudno Civic Association | Comments on "Towards a Conservation Development Framework", dated June 2000 |
| 68. | Crook Family | | |
| 69. | Martin Molteno | | |
| 70. | Wendy Greenaway | | |
| 71. | Christopher Spottiswoode | | |
| 72. | Jonny Gevisser | | |
| 73. | Jeanette Walker | | |
| 74. | Rosalind Bean | | |
| 75. | Mandy and Mark Noffke | | |
| 76. | Cathy Williams | | |

**List of Interested and Affected Parties who Submitted Written Comment on
 the Draft Conservation Development Framework and Associated Maps
 (continued)**

| Ref No | Party | Organisation/s Represented | Enclosures |
|--------|--|--|---|
| 77. | Laura Czerniewicz | | |
| 78. | Ingrid Weideman | | |
| 79. | Moira Serrislev | | |
| 80. | Pat Bowerbank | | |
| 81. | Brian Byrne | | |
| 82. | Robin and Rea Borchers | | |
| 83. | Mandy, Maxine and Peter Wood | | |
| 84. | Dee Cooper Smith | | |
| 85. | Ian Alexander | | |
| 86. | Carol de Gendt, Corinne Merry, Phyllis Carter, Val Bennett, petition plus supplementary petition | <input type="checkbox"/> 2163 individuals interviewed while walking at Silvermine, Newlands Forest, Tokai, Constantia Nek and Cecilia. <input type="checkbox"/> Supplementary petitions signed by 53, 151 and 23 individuals. | Additional background information, survey results, and notes. |
| 87. | Debbie and Laura de Villiers | | |
| 88. | Lindsay Peel | | |
| 89. | P Reinecke | | |
| 90. | Ann Gamble | | |
| 91. | | <input type="checkbox"/> Friends of the Tahr | Petitions and letters from approximately 4000 individuals. |
| 92. | Ellen Fedele | | |
| 93. | Gill Weinberg | | |
| 94. | Martin Crawford and family | | |
| 95. | Lynne Moss | | |
| 96. | Denise Moody | | |
| 97. | Tom Roach | | |
| 98. | Ben Kopfer | <input type="checkbox"/> Good Hope Ecotourism and Conservation Organisation | |
| 99. | William Barker | | Map of proposed track from Rhodes Memorial to south of Devil's Peak Forest Station. |

**List of Interested and Affected Parties who Submitted Written Comment on
 the Draft Conservation Development Framework and Associated Maps
 (continued)**

| Ref No | Party | Organisation/s Represented | Enclosures |
|---------------|--------------------------------|-----------------------------------|-------------------|
| 100. | Sue Oppenheim | | |
| 101. | Phyllis Carter and Val Bennett | | |
| 102. | Hazel Campbell | | |
| 103. | Diane Callow | | |
| 104. | Philip Grutter | | |
| 105. | Kate Hopkins and Di Wilson | | |
| 106. | Philip Rosenthal | | |
| 107. | Peter and Jill Blignaut | | |
| 108. | Elizabeth Sole | | |
| 109. | Elsbeth Jack | | |
| 110. | Philip Lloyd | | |
| 111. | David Raphael | | |
| 112. | HJ Crankshaw | | |
| 113. | Vikki Draper | | |
| 114. | P Schoonraad | | |
| 115. | G Goncalves | | |
| 116. | GM Russell | | |
| 117. | Sally McConnell | | |
| 118. | Richard Hill and Monique Nauta | | |
| 119. | Allan Kaplan | | |
| 120. | Barbara Dale-Jones | | |
| 121. | DF Stechman | | |
| 122. | Carol de Gendt | | |
| 123. | Tom Lawless | | |
| 124. | Kenny Phillips | | |
| 125. | Coelle | | |
| 126. | Petition | ☐ 2 individuals | |
| 127. | Jill and Charles Chiappini | | |

**List of Interested and Affected Parties who Submitted Written Comment on
 the Draft Conservation Development Framework and Associated Maps
 (continued)**

| Ref No | Party | Organisation/s Represented | Enclosures |
|--------|-------------------------------------|---|---|
| 128. | Kier Hennessy | <input type="checkbox"/> CMC Administration, Spatial Planning Dept | |
| 129. | CJ Schutz | | |
| 130. | Richard Rosenthal | | |
| 131. | TR Pretorius | | |
| 132. | Graham Field | | |
| 133. | Jacque Cullis | <input type="checkbox"/> Cape Institute of Architects Heritage Committee | |
| 134. | Val du Plessis and Lorraine Collins | | |
| 135. | C Jansen | | |
| 136. | Jeanette Shapiro | | |
| 137. | Julia Wood | | |
| 138. | David Gretton | | |
| 139. | Bernard Wagener | | |
| 140. | JAA Goy | <input type="checkbox"/> The Mountain Club of South Africa, Cape Town section | |
| 141. | JAA Goy | <input type="checkbox"/> Friends of Newlands Forest | |
| 142. | Sue Davidoff | | |
| 143. | JL de Villiers | <input type="checkbox"/> Peninsula Mountain Forum, a network of organisations caring for the Peninsula Mountain Chain (list of member organisations provided) | Proceedings of the PMF Workshop on the draft CDF for the CPNP, 13/12/00 |
| 144. | Sandy Barnes and Alida Croudace | <input type="checkbox"/> Silvermine Valley Coalition (list of participating groups provided) | |
| 145. | Dave Cowley | <input type="checkbox"/> Hout Bay & Llandudno Heritage Trust | |
| 146. | Nicki Stevens | <input type="checkbox"/> Friends of Lion's Head | |
| 147. | Fabio Todeschini | | |
| 148. | Wendy Morgenrood | <input type="checkbox"/> Hout Bay Ward Planning Subcommittee | |

**List of Interested and Affected Parties who Submitted Written Comment on
the Draft Conservation Development Framework and Associated Maps
(continued)**

| Ref No | Party | Organisation/s Represented | Enclosures |
|---------------|--------------------------------------|--|-------------------|
| 149. | Sandra Hustwick | <input type="checkbox"/> Joint response from various branches [given], synthesised by Environmental Management Branch, City of Cape Town, Cape Town Administration | |
| 150. | Eileen Weinronk | <input type="checkbox"/> CMC Administration, Environmental Management Department | |
| 151. | Clare Burgess and Bernard Oberholzer | <input type="checkbox"/> Institute for Landscape Architects of South Africa | |