

**POLICY FOR TiptIMPOSE USE
OF THE C E P E I I SULIt**

VOLUME 3: REPORT ON PUBLIC

eaucy FOR TIC'S OSE USE OF THE CAPE PENINSULA

VOL

PORT ON PUBLIC ■ UT

**This report is accompanied by:
VOLUME 1 ^p Main Report
VOLUME 2 - Appendices**

PROJECT LEADERS:

**R.F. Fuggle
W.R. Siegfried
J.P. Raimondo**

PROJECT COORDINATORS:

**S. Lane
R. Wynberg
M. Cosijn**

**University of Cape Town
11 July 1994**

6°V\$ ea^{BS}ia 4640
|| 11111 011 11 11

VOL 3: REPORT ON PUBLIC

T L E O F C O N T S

I. RESPONSES TO THE DRAFT POLICY REPORT

- 1.1 Main Points Raised in Response to the Draft Policy Report
- 1.2 Statistical Summary of Responses to the Draft Policy Report
- 1.3 List of Respondents
- 1.4 Summary of Main Points Raised in Meetings Held on the Cape Flats

2. CHRONOLOGICAL EVENTS in THE PUBLIC PARTICIPATION PROCESS

3. COMMENTS RECEIVED IN RESPONSE TO THE DRAFT POLICY REPORT

4. LIST OF INTERESTED AND AFFECTED PARTIES

5. CIRCULARS

6. COMMENTS RECEIVED FROM INTERESTED AND AFFECTED PARTIES PRIOR TO THE DISTRIBUTION OF THE APRIL 1994 DRAFT POLICY REPORT

Part A: Comments Received from Interested and Affected Parties on the CPPriE Policy Investigation

Part 13: Comments Received from Planning and Private Land-owning Groups within the South Peninsula.

7. PUBLIC PARTICIPATION ASPECTS OF THE MULTI-PURPOSE USE OF THE CAPE PENINSULA: REPORT ON MEETINGS HELD ON THE CAPE FLATS

H

POL(3)

1. RESPONSES TO THE DRAFT POLICY REPORT

1.1 MAIN POINTS RAISED IN RESPONSE TO THE DRAFT POLICY REPORT

The proposals contained in the April 1994 Draft Policy Report received overwhelming public support. This is evidenced in Section 1.2, which lists the statistics obtained in response to the questionnaire circulated with the Draft Policy Report.

Extremely useful comments were recorded by a range of organisations and individuals. On the basis of such comment, major variations have been made to the recommendations of the final report. Many minor variations which were suggested have been incorporated in the text of the document.

Main points raised related to the nature of the authority; the implementation of the policy; the extension of the boundaries; and the functioning of the Perimeter functional area.

In the first instance, concern was expressed that another level of bureaucracy was being created through the establishment of the Cape Peninsula Heritage-Area Authority. The fact that this body is intended as a single purpose authority was poorly understood, as were the structures to ensure accountability. Several respondents raised the point that the policies proposed in the report, with regard to creating entirely separate legislation and a new authority, might not be feasible given South Africa's present backlog of legislative reforms, and lack of secure funding for nature protection. It was suggested by a range of organisations and people that it may be expedient for the National Parks Act to be amended to incorporate the criteria described in this report. The recommendations of this report have been adjusted to incorporate this possibility. Suggestions that more prominence be given to the proposals to seek World Heritage Site status for the Cape Peninsula have been addressed.

Concern was additionally expressed that the implementation of the policies contained in this report might be retarded by bureaucratic inertia. In response to this concern, a recommendation has been made that the premier of the Western Cape appoint an expert and representative group to ensure that the report's recommendations are given due consideration, and are guided through the political processes that will be required to give them effect.

Many interested and affected parties were confused as to the boundary changes recommended in the Draft Policy Report. The accommodation of marine and coastal environments within land-based functional areas in particular was questioned. A Marine functional area has been added to the final report in order to accommodate different management strategies required for marine and coastal environments. Thus five functional areas are now proposed: Remote, Quiet, Marine, Leisure, and Perimeter.

There was a lack of clarity amongst the public as to jurisdictions within the Perimeter functional area (termed the Transitional area in the Draft Policy Report). The different powers which the Cape Peninsula heritage-Area Authority would have in different functional areas has been clarified in the final report.

While the recommendations of the Draft Policy Report received a remarkable degree of support from those who commented on it, it is worth noting that public attendance at public meetings was generally poor. This can probably be attributed to the fact that the investigation was of a policy nature, and thus less tangible and relevant than issues of a local nature (see Sections 1.4 and 7). Other factors contributing to the low levels of public interest were the pre-election timing of the investigation; the vast range of initiatives and competing issues taking place in the Cape Metropolitan Area; low levels of awareness among the public about the geographical area and the issues concerning it (see Sections 1.4 and 7); and the fact that public meetings were advertised via circulars to interested and affected parties, and only to a limited extent in local newspapers.

1.2 STATISTICAL SUMMARY OF RESPONSES TO THE DRAFT POLICY REPORT

In total, 90 interested and affected parties responded using the form provided with the Draft Policy Report (see pages 1.74.23). The following analysis is a summary of the responses received. The detailed comments which accompanied these responses, as well as other comments received, are recorded in Section 3 of this volume.

Rating of the PRINCIPLES on which PROPOSED POLICY is based

1% No Rating
80% VALID
8% PARTLY VALID
11% INSUFFICIENT

Rating of the PRIMARY CONCLUSIONS of this investigation

6% No Rating
64% VALID
12% PARTLY VALID
18% INSUFFICIENT

Rating of the PRIMARY RECOMMENDATIONS of this investigation

7% No Rating
53% APPROPRIATE
22% PARTLY APPROPRIATE
2% INAPPROPRIATE
16% INSUFFICIENT

Rating of the CONCLUSION CONCERNING BIOLOGICAL DIVERSITY

10% No Rating
77% VALID
6% PARTLY VALID
7% INSUFFICIENT

Rating of the MOTIVATION CONCERNING BIOLOGICAL DIVERSITY

9% No Rating
77% ADEQUATE
10% PARTLY ADEQUATE
4% INADEQUATE

**Rating of the RECOMMENDATIONS concerning BIOLOGICAL
DIVERSITY**

12% No Rating
54% APPROPRIATE
15% PARTLY APPROPRIATE
3% INAPPROPRIATE
16% INSUFFICIENT

**Rating of the CONCLUSION concerning CULTURAL & SCENIC
DIVERSITY**

9% No Rating
75% VALID
8% PARTLY VALID
1% INVALID
7% INSUFFICIENT

**Rating of the MOTIVATION concerning CULTURAL & SCENIC
DIVERSITY**

9% No Rating
74% ADEQUATE
12% PARTLY ADEQUATE
5% INADEQUATE

**Rating of the RECOMMENDATIONS concerning CULTURAL &
SCENIC DIVERSITY**

9% No Rating
68% APPROPRIATE
12% PARTLY APPROPRIATE
1% INAPPROPRIATE
10% INSUFFICIENT

**Rating of the CONCLUSION concerning JURISDICTIONAL
BOUNDARIES**

11% No Rating
79% VALID
6% PARTLY VALID
2% INVALID
2% INSUFFICIENT

**Rating of the MOTIVATION concerning JURISDICTIONAL
BOUNDARIES**

10% No Rating
75% ADEQUATE
8% PARTLY ADEQUATE
7% INADEQUATE

**Rating of the RECOMMENDATIONS concerning JURISDICTIONAL
BOUNDARIES**

11% No Rating
57% APPROPRIATE
13% PARTLY APPROPRIATE
6% INAPPROPRIATE
13% INSUFFICIENT

Preferences for a NAME for the Area

22% No Preference Indicated
63% CAPE PENINSULA HERITAGE AREA
3% CAPE PENINSULA GROWTH MANAGEMENT AREA
3% CAPE PENINSULA MANAGEMENT AREA
3% CAPE PENINSULA MOUNTAIN SYSTEM
8% CAPE PENINSULA PARK

Rating of the CONCLUSION concerning FUNCTIONAL AREAS

11% No Rating
72% VALID
10% PARTLY VALID
2% INVALID
5% INSUFFICIENT

Rating of the MOTIVATION concerning FUNCTIONAL AREAS

9% No Rating
79% ADEQUATE
9% PARTLY ADEQUATE
3% INADEQUATE

Rating of the RECOMMENDATIONS concerning FUNCTIONAL AREAS

12% No Rating
50% APPROPRIATE
23% PARTLY APPROPRIATE
2% INAPPROPRIATE
12% INSUFFICIENT

Rating of the CONCLUSIONS concerning FUNCTIONS AND POWERS

10% No Rating
71% VALID
11% PARTLY VALID
2% INVALID
6% INSUFFICIENT

Rating of the MOTIVATION concerning FUNCTIONS AND POWERS

10% No Rating
70% ADEQUATE
18% PARTLY ADEQUATE
2% INADEQUATE

Rating of the RECOMMENDATIONS concerning FUNCTIONS AND POWERS

7% No Rating
57% APPROPRIATE
21% PARTLY APPROPRIATE
9% INAPPROPRIATE
6% INSUFFICIENT

Rating of the IMPLICATIONS OF IMPLEMENTING THE RECOMMENDATIONS

10% No Rating
60% VALID
17% PARTLY VALID
3% INVALID
9% INSUFFICIENT

Does the report fulfil the brief for this study?

15% No Rating
17% NO
68% YES

Is the report sufficiently comprehensive? (with appendices)

15% No Rating
14% NO
71% YES

Is the report accurate?

17% No Rating
6% NO
77% YES

Are the recommendations of the report practicable?

16% No Rating
20% NO
64% YES

FORM FOR COMMENTS ON THE DRAFT POLICY FOR MULTIPURPOSE USE OF THE CAPE PENINSULA

The purpose of this form is to help you record your comments on the Draft Policy document in a structured way. Use of the form will in turn facilitate our collation and response to the comments received.

Instructions

The form comprises two parts. We would be grateful if you could complete both Part A: Comment on Sections of the Draft Policy, and Part B: General comment on the Draft Policy.

Please return your comment form, before 3 June 1994, to:

CPPNE Project
Environmental Evaluation Unit
University of Cape Town
Private Bag
7700 Rondebosch Fax: 650 3791

Thank you for commenting on the document.

NAME:
ADDRESS:
PROFESSIONAL AREA OF EXPERTISE:
ORGANISATION REPRESENTED (if applicable):
ADDRESS OF ORGANISATION (if applicable):

TEL: PAM

PART A
COMMENTS ON SECTIONS OF THE DRAFT POLICY

Please feel free to concentrate your comment on those Sections of the report about which you are most knowledgeable, interested or concerned.
Where the space allocated to a particular answer is insufficient, please continue your comment on a separate sheet of paper, and attach it to the form.

**SECTION 3: PRINCIPLES UNDERPINNING THE PROPOSED
POLICY (PAGES 27-28).**

*Six principles underpin the proposed policy, namely
sustainability, equity, efficiency, participation,
accountability and adaptability.*

**1. HOW WOULD YOU RATE THE PRINCIPLES ON WHICH THE
PROPOSED POLICY IS BASED?**

valid
partly valid

invalid
insufficient

If 'partly valid' or 'invalid', what should be changed?

If 'insufficient', what should be added?

SECTION 4.1 PRIMARY CONCLUSIONS AND RECOMMENDATIONS (PAGES 29-30).

**I. HOW WOULD YOU RATE THE PRIMARY CONCLUSIONS OF
THIS INVESTIGATION?**

valid

invalid

partly valid

insufficient

If 'partly valid' or 'invalid', what should be changed?

If 'insufficient', what should be added?

**2. HOW WOULD YOU RATE THE PRIMARY RECOMMENDATIONS
OF THIS INVESTIGATION?**

appropriate

inappropriate

partly appropriate

insufficient

If 'partly appropriate' or 'inappropriate', what should be changed?

If Insufficient', what should be added?

SECTION 4.2: BIOLOGICAL DIVERSITY (PAGE 31).

PLEASE RATE YOUR LEVEL OF KNOWLEDGE ABOUT THIS ISSUE.

very knowledgeable
somewhat knowledgeable

not knowledgeable
unsure

Section 4.2.1: Conclusion concerning biological diversity (page 31).

The richness of the Bora and fauna in the Cape Peninsula is extraordinary by local national and international standards. South Africa thus has both a national and an international obligation to ensure that the highest level of protection is accorded to the biological diversity of the Cape Peninsula. This obligation is of particular relevance- since South Africa has recently signed the international Convention on Biological Diversity.

HOW WOULD YOU RATE THE CONCLUSION CONCERNING BIOLOGICAL DIVERSITY?

valid
partly valid

invalid
insufficient

If "partly valid" or Invalid', what should be changed?

If "insufficient', what should be added?

SECTION 4.2.2: MOTIVATION CONCERNING BIOLOGICAL DIVERSITY (PAGES 31-35).

HOW WOULD YOU RATE THE MOTIVATION CONCERNING BIOLOGICAL DIVERSITY?

adequate

inadequate

partly adequate

If 'partly adequate, what should be changed?

If *inadequate, what should be added?

Section 4.2.3: Recommendations concerning biological diversity (pages 35-37).

PRINCIPLE RECOMMENDATION:

Any changes to land- water and air in the Cape Peninsula should be regulated in such a way as to maintain and where possible and appropriate, enhance the area's Ha, biological diversity.

HOW WOULD YOU RATE THE RECOMMENDATIONS CONCERNING BIOLOGICAL DIVERSITY?

appropriate

inappropriate

partly appropriate

insufficient

If 'partly appropriate or 'inappropriate, what should be changed?

If 'insufficient', what should be added?

**SECTION 4.3: CULTURAL AND SCENIC DIVERSITY
(PAGE 38).**

PLEASE RATE YOUR LEVEL OF KNOWLEDGE ABOUT THIS ISSUE.

very knowledgeable
somewhat knowledgeable

not knowledgeable
unsure

Section 4.3.1: Conclusion concerning cultural and scenic diversity (page 38).

The use of the exceptional cultural and scenic assets of the Cape Peninsula is not being optimised. Inappropriate development is reducing the area's visual quality.

HOW WOULD YOU RATE THE CONCLUSION CONCERNING CULTURAL AND SCENIC DIVERSITY?

valid
partly valid

invalid
insufficient

If 'partly valid' or 'invalid', what should be changed?

If 'insufficient', what should be added?

Section 4.3.2: Motivation concerning cultural and scenic diversity (pages 38-40).

HOW WOULD YOU RATE THE MOTIVATION CONCERNING CULTURAL AND SCENIC DIVERSITY?

adequate

inadequate

partly adequate

If 'partly adequate', what should be changed?

If 'inadequate', what should be added?

Section 4.3.3: Recommendations concerning cultural and scenic diversity (pages 40-41).

PRINCIPLE RECOMMENDATION:

Use of the Cape Peninsula should be managed so as to enhance societal benefits and minimise the loss of the area's cultural and scenic diversity.

HOW WOULD YOU RATE THE RECOMMENDATIONS CONCERNING CULTURAL AND SCENIC DIVERSITY?

appropriate

inappropriate

partly appropriate

insufficient

If 'partly appropriate' or 'inappropriate', what should be changed?

If 'insufficient', what should be added?

SECTION 4.4: JURISDICTIONAL BOUNDARIES (PAGE 42).

PLEASE RATE YOUR LEVEL OF KNOWLEDGE ABOUT THIS ISSUE.

very knowledgeable
somewhat knowledgeable

not knowledgeable
unsure

Section 4.4.1: Conclusion concerning Jurisdictional boundaries (page 42).

The jurisdictional boundaries of the Cope Peninsula Protected Natural Environment are not optimal for realising the proposed policy.

HOW WOULD YOU RATE THE CONCLUSION CONCERNING JURISDICTIONAL BOUNDARIES?

valid
partly valid

invalid
insufficient

If 'partly valid' or 'invalid', what should be changed?

If 'insufficient', what should be added?

**Section 4.4.2: Motivation concerning jurisdictional boundaries
(pages 42-43).**

**HOW WOULD YOU RATE THE MOTIVATION CONCERNING
JURISDICTIONAL BOUNDARIES?**

adequate

inadequate

partly adequate

If 'partly adequate', what should be changed?

If Inadequate, what should be added?

**Section 4.4.3: Recommendations concerning jurisdictional
boundaries (pages 43-44).**

PRINCIPLE RECOMMENDATION:

The area at present called the Cape Peninsula Protected Natural Environment should be expanded to include the surrounding seas and urban hinge_ and become known as the Cape Peninsula Heritage Area.

**HOW WOULD YOU RATE THE RECOMMENDATIONS
CONCERNING JURISDICTIONAL BOUNDARIES?**

appropriate

inappropriate

partly appropriate

insufficient

If 'partly appropriate' or 'inappropriate', what should be changed?

If 'insufficient', what should be added?

NAME OF AREA: pages 9, 13 and 43

PLEASE INDICATE YOUR PREFERENCE FOR A NAME FOR THE AREA:

Cape Peninsula Heritage Area

Cape Peninsula Development Control Area

Cape Peninsula Growth Management Area

Cape Peninsula Management Area

Cape Peninsula Mountain System

Cape Peninsula Park

If you have any other suggestions, please give these to us with reasons for your choice:

SECTION 4.5: FUNCTIONAL AREAS (PAGE 44).

PLEASE RATE YOUR LEVEL OF KNOWLEDGE ABOUT THIS ISSUE.

very knowledgeable	not knowledgeable
somewhat knowledgeable	unsure

Section 4.5.1: Conclusion concerning functional areas (page 44).

The Cape Peninsula has a great variety of physical, ecological and social carrying capacities, ranging from areas which can tolerate and should be developed for intensive use, to those which cannot tolerate as much disturbance and should be managed as wild nature protection areas. Use and management objectives in the Cape Peninsula Protected lYatural Environment currently bear little relation to carrying capacities - neither in the sift-specific context nor in a peninsula wide context.

HOW WOULD YOU RATE THE CONCLUSION CONCERNING FUNCTIONAL AREAS?

valid	invalid
partly valid	insufficient

If 'partly valid' or 'invalid', what should be changed?

If 'insufficient', what should be added?

PLEASE RATE YOUR LEVEL OF KNOWLEDGE ABOUT THIS ISSUE.

very knowledgeable
somewhat knowledgeable

not knowledgeable
unsure

Section 4.6.1: Conclusions concerning authority functions and powers (page 52).

The Management Advisory Committee of the Cape Peninsula Protected Natural Environment does not have adequate powers to implement the proposed policy in its present area of jurisdiction, let alone in the expanded Cape Peninsula Development Control Area. Existing public authorities have other primary interests and would be distracted from implementing this policy. No single public authority would obtain the run support of all stakeholders in the Cape Peninsula for the purposes of managing use of the Cape Peninsula Heritage Area.

HOW WOULD YOU RATE THE CONCLUSIONS CONCERNING AUTHORITY FUNCTIONS AND POWERS?

valid
_____ partly valid
If 'partly valid' or 'invalid', what should be changed?

invalid
insufficient

If 'insufficient', what should be added?

Section 4.6.2: Motivation concerning authority functions and powers (pages 55-57).

HOW WOULD YOU RATE THE MOTIVATION CONCERNING
AUTHORITY FUNCTIONS AND POWERS?

adequate

inadequate

partly adequate

If 'partly adequate, what should be changed?

If Inadequate, what should be added?

Section 446.3: Recommendations concerning authority functions and powers (pages 58-59).

PRINCIPLE RECOMMENDATION:

A single statutory authority, provisionally called the Cape Peninsula Heritage-Area Authority- should be created by national legislation to act as the custodian of the Cape Peninsula- and to promote enhanced nature-orientated multipurpose use of the area.

**HOW WOULD YOU RATE THE RECOMMENDATIONS
CONCERNING AUTHORITY FUNCTIONS AND POWERS?**

- appropriate

inappropriate

- partly appropriate

insufficient

If 'partly appropriate' or 'inappropriate, what should be changed?

If Insufficient', what should be added?

**SECTION 4.7: IMPLICATIONS OF IMPLEMENTING THE
RECOMMENDATIONS (PAGES 59-63).**

Implementation of these recommendations should allow for effective and efficient execution of a uniform set of policies to manage the use of the Cape Peninsula Heritage Area. This in tans should achieve competent management, facilitate protection of biodiversity. enhance visual quality, promote recreation opportunitis, protect human Iffie and property in and adjoining the Heritage Area, optimise water catchment potential and ensure that the public has a vested interest^{III} managing the protection and use of the Cape Peninsula Heritage Area.

**HOW WOULD YOU RATE THE IMPLICATIONS OF
IMPLEMENTING THE RECOMMENDATIONS?**

valid

invalid

partly valid

insufficient

If 'partly valid' or 'invalid', what should be changed?

If 'insufficient', what should be added?

PART B
GENERAL COMMENT ON THE DRAFT POLICY

1. DOES THE REPORT FULFIL THE BRIEF FOR THE STUDY?

yes

no

If 'no', please give reasons for your answer.

2. IS THE REPORT SUFFICIENTLY COMPREHENSIVE, TAKING THE APPENDICES INTO CONSIDERATION?

— yes

— no

If 'no', please give reasons for your answer.

3. IS THE REPORT ACCURATE?

yes

no

If 'no', please give reasons for your answer.

4. ARE THE RECOMMENDATIONS OF THE REPORT PRACTICABLE?

yes

no

If 'no', please give reasons for your answer.

5. DO YOU HAVE ANY OTHER COMMENTS ON THE REPORT WHICH YOU WOULD LIKE TO RECORD?

yes

no

If 'yes', please elaborate.

1.3 LIST OF RESPONDENTS

The following lists the individual and, where relevant, organisation represented who responded to the Draft Policy Report. Respondents are listed in order of the date at which the response was received. The date set for comments to be received was the 3 June 1994.

3.04.94	Q Manson-Kullin CJ van der Spuy; Representatives; LLANDUDNO LOCAL COUNCIL
20.04.94	Mr PM Adams
20.04.94	Mr L Jooste
28.04.94	Mr D Wightman
4.05.94	Ms O Abrahams
4.05.94	Mr JN Butterworth; Chemist; SERINA KAOLIN (Pty) LTD
5.05.94	Prof JR Grindley
5.05.94	Mr OH von dem Bussche; Regional Forestry Manager, Western Cape; SOUTH AFRICAN FORESTRY COMPANY (Ltd)
6.05.94	Mr P Dennehy
6.05.94	Mrs J Welsh; Public Relations Manager; GOLDEN ARROW BUS SERVICES
9.05.94	Mr Z Erasmus
10.05.94	Mr L Walter; Representative; FISH HOEK RESIDENTS ASSOCIATION
16.05.94	Dr J Kane-Berman
16.05.94	Mr N Malherbe
16.05.94	Mr LG McEwan; Chairman; LAKESIDE/MUIZENBERG RATEPAYERS ASSOCIATION
16.05.94	Mr WH Thomas
17.05.94	Mrs NJ du Rand
20.05.94	Mr CB Mitchell
23.05.94	Mr C Adams
23.05.94	Mr I Gerrard
24.05.94	Mr PM Adams
24.05.94	G de Wet; Member of the University Planning Unit; UNIVERSITY OF CAPE TOWN
24.05.94	Dr D Sleigh
24.05.94	Mr S Townsend; member; CAPE INSTITUTE OF ARCHITECTS
24.05.94	Dr BW van Wilgen; Representative; CSIR FORESTRY SCIENCE AND TECHNOLOGY
25.05.94	Mr R Hunt
27.05.94	Mr All Fourie
30.05.94	NATSOC
1.06.94	Councillors P Landen and V Kabalin; Councillors; FISH HOEK MUNICIPALITY
1.06.94	Mr JB Marais; Town Clerk; SIMON'S TOWN MUNICIPALITY
1.08.94	Ms M Thesen; Chairman; FRIENDS OF THE CAPE OF GOOD HOPE NATURE RESERVE

- 1.06.94 Mrs B Walker; Representative; WARD 4 RATEPAYERS' ASSOCIATION
- 2.06.94 Prof Q Branch
- 2.06.94 Mr ND Geldenhuys; Executive Director: Southern Parks; NATIONAL PARKS BOARD
- 2.06.94 Mr P Gray
- 2.06.94 Mr J Hale; Representative; SWARTKLIP ALIEN VEGETATION ERADICATORS
- 2.06.94 Mr TF KEANE; Representative; FISH HOEK ALIEN VEGETATION CONTROL GROUP
- 2.06.94 Mr B Kopfer
- 2.06.94 Mr L Liebenberg
- 2.06.94 Ms S Louw
- 2.06.94 Messrs Lutsch, Coetzee, Cowan
- 2.06.94 Dr DM Richardson; Acting Chairman NOT FORMAL MAC RESPONSE; CPPNE MAC SCIENTIFIC SUB-COMMITTEE
- 2.08.94 Mr EJ van der Horst
- 3.06.94 Ms C Burgess
- 3.06.94 CHIEF EXECUTIVE OFFICER; ; LOCAL COUNCIL OF CONSTANTIA VALLEY
- 3.06.94 ENVIRONMENTALIST SOCIETY (ENSOC)
- 3.06.94 Mr JM Fudge
- 3.06.94 Ms S Howes
- 3.06.94 INSTITUTE OF LANDSCAPE ARCHITECTS
- 3.06.94 Dr LAW MacDonald; Representative; SOUTHERN AFRICAN NATURE FOUNDATION
- 3.06.94 O.C. NAVAL BASE, SIMON'S TOWN
- 3.06.94 Mr DN Rousseau; Representative; HIKING FEDERATION OF S.A. (WESTERN CAPE REGION)
- 3.06.94 Ms GM Russell
- 3.06.94 SMITSWINKEL BAY RESIDENTS' ASSOCIATION
- 3.06.94 THE CHAIRPERSON OF RLCG; ; REDHILL LANDOWNERS CONSERVATION GROUP
- 3.06.94 The Secretary; TABLE MOUNTAIN AND SILVERMINE NRAB
- 3.06.94 Ms P van der Spuy; Representative; SOUTH AFRICAN TOURISM BOARD
- 6.06.94 Prof GB Brundrit; Representative; FRIENDS OF SIMON'S TOWN COASTLINE
- 6.06.94 Mr M Callaghan
- 6.06.94 Mr L Coelen
- 6.06.94 Mr L de Waal
- 6.06.94 Dr M Euston-Brown
- 6.06.94 Mr J Fowkes
- 6.06.94 Mr B Qasson
- 6.06.94 Mr J Glazewski
- 6.06.94 Messrs J Levy and L Coelen; REPRESENTATIVES; MOUNTAIN CLUB OF 5015111 AFRICA
- 6.06.94 MR B Oberholzer
- 6.06.94 CA Rose; Representative; SOUTHERN AFRICA ROADS FEDERATION
- 6.06.94 AN Starke

**6.06.94 Mr J Stegmann; Trust Chairman; WPPPA TABLE MOUNTAIN
BIKEPATH TRUST**

6.06.94 Mr E Tilanus

6.06.94 Mr D Wheeler

7.06.94 Dr OW Davis

**7.06.94 Mr P le Roux; Environmental Manager; SOUTH AFRICAN
FORESTRY COMPANY (Ltd)**

**7.06.94 P Salter; Representative; SIMON'S TOWN FLORA
CONSERVATION GROUP**

**7.06.94 Mr JA van Wyk; Regional Representative; DEPARTMENT OF
PUBLIC WORKS**

7.06.94 Whitelaw; Representative; CAPE BIRD CLUB

**8.06.94 Dr P Blignaut; Representative; BLIGNAUT AND
ROMMELAERE**

8.06.94 CAPE PROVINCE MOUNTAIN CLUB

8.06.94 CITY OF CAPE TOWN: CITY PLANNER

8.06.94 Mr tl Gold

8.06.94 Ms S Hustwick

8.06.94 Mr DJ McDonald

8.06.94 Mr C Sullivan; Chief Executive Officer; WCRSC

8.06.94 D Thomas

8.06.94 Mr W van Warmelo

8.06.94 Ms P Wormser

9.06.94 Mr J Hallinan

9.06.94 V Marincowitz

**9.06.94 Messrs J Levy and L Coelen; ; MOUNTAIN CLUB OF SOUTH
AFRICA**

**9.06.94 Ms L Robinson; for REGIONAL MANAGER, WESTERN CAPE;
NATIONAL MONUMENTS COUNCIL**

9.06.94 SIMON'S TOWN RATEPAYERS' ASSOCIATION

10.06.94 P Ivey

10.06.94 H Taylor

**13.06.94 ASSISTANT DIRECTOR ENVIRONMENTAL MANAGEMENT; for
Director General; DEPARTMENT OF ENVIRONMENT AFFAIRS**

13.06.94 Prof D Dewar

13.06.94 Ms D Salters

13.06.94 Mr D Stechman

13.06.94 Prof F Todeschini

14.06.94 KOMMETJIE ENVIRONMENTAL AWARENESS GROUP

16.06.94 Dr J Gardner; Chairman; CAPE WETLANDS TRUST

20.06.94 Mr JE Avis

**20.06.94 Mr K van Huyssteen; Representative; UNIVERSITY OF
STELLENBOSCH, GEOGRAPHY DEPARTMENT**

**29.06.94 Mr R Saunders; Co-convenor, Conservation sub-committee;
MOUNTAIN CLUB OF SOUTH AFRICA**

30.06.94 Mr P le Roux

**08-07-94 Ms M.J. Morris; Representative; PENINSULA MOUNTAIN
FORUM**

**08-07-94 Mr Andy Gubb; Representative; WILDLIFE SOCIETY OF
SOUTHERN AFRICA**

**08-07-94 Dr Louis Botha; Chief Director; SEA
FISHERIES, DEPARTMENT OF ENVIRONMENT AFFAIRS**

1.4. SUMMARY OF MAIN POINTS RAISED IN MEETINGS HELD ON THE CAPE FLATS (See Appendix 7 for a detailed report)

The following is a summary of points raised during meetings held in the Cape Flats to discuss the Draft Policy Report. The summary has been prepared by Ms Farieda Khan, of the Environmental Advisory Unit, University of Cape Town. A detailed account of these meetings is presently being prepared by the Environmental Advisory Unit. This report will be circulated to all libraries as well as participants at the meetings once complete.

All the meetings held on the Cape Flats had certain common elements, and highlighted certain common problems:

Firstly, the majority of the people who attended had no problems with the draft policy, accepting; in the main, the principles upon which it was based, and the recommendations which were put forward. However, this should *be* seen in the context of the fact that most people had not read the document prior to the meeting.

Secondly, it was clear that many people were not familiar with many of the geographic areas discussed, or issues raised in the report. Several speakers mentioned that they had never visited Cape Point, because it was too expensive to enter the reserve; while others admitted that they were unclear about the issues raised in the report, and were thus unable to respond. Some speakers suggested holding public meetings after an initial meeting at which the issues had been explained. Other speakers maintained that more than one meeting was necessary in order for the issues raised to be properly discussed within their organisations.

Thirdly, most speakers at the meeting were concerned about the fact that the report dealt only with the Cape Peninsula, and did not address the many serious environmental and development problems on the Cape Flats. This perceived shortcoming angered several speakers. Even though it was pointed out that there were other studies which would provide guidelines for the future development of the Cape Metropolitan

Area, members of the public remained dissatisfied, feeling that an integrated plan for the whole of the Peninsula and the Cape Flats should have been dealt with simultaneously. Members of the public felt that the identification of the Cape Peninsula as a 'special' place, the Cape Flats was once again being ignored and neglected just as it had been under the old dispensation.

Fourthly, the principle of public participation was overwhelmingly endorsed. It was clear that members of the public expected to be consulted, and to be fully involved in planning proposals. Notwithstanding the abovementioned problems, many speakers expressed their interest in the issues raised and were eager to know more about environmental and development issues affecting the Cape Metropolitan Area. Several speakers also expressed the hope that these meetings were just the beginning of an ongoing process which would keep the public informed of projects affecting them.

Fifthly, while a tremendous amount of effort had gone into organising the public meetings in an attempt to ensure good attendances, the generally low attendances were an indication that additional, or different strategies are required. The distances that residents of Mitchells Plain and Khayelitsha had to travel even to reach a central venue within the area, definitely affected attendance at those meetings.

Finally, it is evident that the apartheid legacy of poor education has contributed in large measure to the high levels of ignorance about environmental issues among black communities demonstrated at the meeting. This once again highlights the need for environmental education aimed at adults, as well as the youth, in black communities. In addition, the cumulative effect of the Group Areas and Separate Amenities Act (abolished in 1991), has resulted in widespread unfamiliarity with many parts of the Cape Peninsula. These problems present obstacles to the involvement of previously marginalised communities, and will have to be dealt with if black communities are to become fully involved in public participation in the future.

The following recommendations are made:

- **Public meetings should incorporate a strong education component, and ensure that the issues are fully, but clearly and simply explained.**
- **Local issues and problems must receive prominence, or, at the very least, be integrated into the agenda of public meetings.**
- **More than one public meeting to discuss a particular issue should be held.**
- **More than one venue within large settlements and townships should be utilised for public meetings.**
- **Tap into the existing support base of community organisations such as civic associations and community institutions such as schools and libraries, by utilising part of their meetings or official hours.**

Despite the problems identified during this series of meetings on the Cape Flats, the meetings themselves were highly successful, in that the full participation of the audience was secured. This may be attributed to the relaxed atmosphere, the familiarity of the venue, as well as the fact that the meetings were conducted very informally. Members of the public were also encouraged to speak in their home languages. Thus, despite the fact that several members of the public were at first reluctant to speak, saying that they did not know enough about the issues involved, most went on to speak their minds.

2. CHRONOLOGICAL EVENTS IN THE PUBLIC PARTICIPATION PROCESS (February 1993 June 1994)

(compiled by the University of Cape Town)

Event: Press statement released by the University of Cape Town to local newspapers (South, The Cape Times, The Argus, Die Burger) announcing the commencement of the investigation, and the need for public involvement.
Date: 02-03-93

Event: Internal workshop of the Environmental Evaluation Unit and the Environmental Advisory Unit to develop an initial list of policy elements.
Date and venue: 05-03-93 at the University of Cape Town.

Event: Initial meeting with Cape Nature Conservation and Land Development Coordination of the Cape Provincial Administration (CPA) to identify policy elements and issues of concern.
Date and venue: 12-03-93 at the offices of the Cape Provincial Administration.

Event: Initial meeting with the City Engineer, Town Planning and Parks and Forests Branch of the Cape Town City Council to identify policy elements and issues of concern.
Date and venue: 12-03-93 at the offices of the Cape Town City Council.

Event: Initial meeting with the planning, engineering and forestry sections of the Western Cape Regional Services Council to identify policy elements and issues of concern.
Date and venue: 12-03-93 at the offices of the Western Cape Regional Services Council.

Event: Initial specialist workshop to refine policy elements. Present were specialists in environmental planning, urban planning, tourism, recreation and archaeology.
Date and venue: 23-03-93 at the University of Cape Town.

Event: Circular #1 was sent to I&APs to provide background information on the project, and to obtain their comment on the following: a draft overarching vision for the management of the CPPNE; a draft list of factors requiring the formulation of policy guidelines; information on the process and estimated timing of the project; and a list of organisations being consulted.
Date: 22-04-93

Event: Personal interviews with representatives from local councils in the Cape Peninsula, local environmental organisations, local authorities, tourism organisations, business, squatter communities, managers of the Cape Peninsula, civic organisations, national conservation organisations, recreational organisations to identify issues of concern.
Date and venue: 26-28 April 1993 at the Environmental Evaluation Unit, University of Cape Town.

Event: Press release from the Management Advisory Committee about the preliminary and provisional findings of the 'Table Mountain' study.

Date: 13-05-93

Event: Legal Workshop, in conjunction with Advocate Kahn to discuss terms of reference and to determine criteria to assess possible legal instruments for managing the use of the Protected Natural Environment. Representatives from Attorney General's Office, Cape Town City Council, Western Cape Regional Services Council, Cape Provincial Administration, National Parks Board, Environmental Law Association, and South African Parliament were present.

Date and venue: 28-06-93 at the University of Cape Town.

Event: Internal workshop of the Environmental Evaluation Unit and Department of Environmental and Geographical Science to refine policy elements gathered to date.

Date and venue: University of Cape Town.

Event: Circular #2 was sent to 234 I&APs to provide those who did not receive Circular #1 with some background information; to inform I&APs of the responses to Circular #1; to address some of the concerns raised; to present I&APs with the preliminary findings of the project; to elaborate on the process being followed by the University of Cape Town; and to inform I&APs as to how they could contribute further. Responses were received over the following months (see Volume 2, Appendix 13).

Date: 20-07-93

Event: Meeting with the Cape Town City Council Town Planners to discuss the City Bowl Growth Management Strategy.

Date and venue: 22-07-93 at the offices of the Cape Town City Council.

Event: Presentation of the UCT CPPNE investigation to the Manager's Forum.

Date and venue: 28-07-93 at Kirstenbosch Botanical Gardens.

Event: Presentation of the investigation to the media by UCT EXCO.

Date and venue: 30-07-93 at the Environmental Evaluation Unit, University of Cape Town.

Event: Radio announcement that a meeting would be held on 03-08-93 at the University of Cape Town to inform the public about the project and to respond to any queries.

Date: 30-07-93

Event: Media release reporting on the meeting held with the media by UCT EXCO on 30-07-93, announcing the public meeting on the 03-08-93 and calling for public input into the policy.

Date: 30-07-93.

Event: Workshop to review visual assessment of the Cape Peninsula. Present were specialists in environmental planning, landscape architecture, town and regional planning and black environmental perceptions.

Date and venue: 04-08-93 in the Environmental and Geographical Science Department, University of Cape Town.

Event: Public meeting and presentation of progress with the investigation.

Date and venue: 03-08-93 at the Environmental Evaluation Unit, University of Cape Town.

Event: Meeting with the Regional Services Council, Van Niekerk, Klein and Edwards, and Zille Shandler Associates to discuss the coordination of different planning projects commissioned by the Regional Services Council, in the Cape Peninsula.

Date and venue: 18-08-93 at the offices of the Regional Services Council.

Event: Meeting with the Redhill Landowner's Conservation Group. The consultants were given a guided tour of the Southern Peninsula by the Group to show the environmental problems.

Date and venue: 18-08-93 at Redhill.

Event: Presentation about the investigation to the South Peninsula Environment Forum

Date and venue: 25-08-93 at Fish Hoek Town Hall.

Event: Straw Dog Draft 4 produced and circulated to exco and specialists.

Date: 06-09-93

Event: Workshop for non-governmental organisations and interested individuals to review cultural-historical specialist reports. Present were specialists in town planning, cultural landscapes, history and archaeology, and representatives from National Monuments Council, Simon van der Stel Foundation, Cape Historical Society and South African Archaeological Society.

Date and venue: 25-09-93 at the University of Cape Town.

Event: Workshop for non-governmental organisations and interested individuals to review biophysical specialist reports on the Cape Peninsula. Present were specialists in botany, zoology, geology, geology, ornithology, herpetology and entomology, and representatives from the Wildlife Society of Southern Africa, Botanical Society of Southern Africa, Habitat Council, Simon's Town Flora Conservation Group, Mountain Club of South Africa, Cape Bird Club and Cape Wetlands Trust and University of the Western Cape.

Date and venue: 09-09-93 at the Environmental Evaluation Unit, University of Cape Town.

Event: Meeting with Van Niekerk, Klein and Edwards, and Zille Shandler Associates to discuss overlaps between this investigation and the South Peninsula Sub-Regional Structure Plan commissioned by the Western Cape Regional Services Council.

Date and venue: 13-09-93 at the University of Cape Town.

Event: Meeting with the Cape Town City Council Town Planners to discuss the relationship of the University of Cape Town's policy to the possible expropriation of the cableway by the City Council.

Date and venue: 16-09-93 at the offices of the Cape Town City Council.

Event: Meeting with representatives of the Cape Town City Council's Urban Conservation Unit to discuss urban fringe area control.

Date and venue: 21-09-93 at the Environmental Evaluation Unit, University of Cape Town.

Event: Meeting of the Recreation Sub-committee of Management Advisory Committee to discuss footpath policies.

Date and venue: 23-09-93 at the offices of Cape Town City Council.

Event: Meeting of the Finance Sub-committee of MAC to clarify their terms of reference in view of UCT's project.

Date and venue: 28-09-93 at Cape Nature Conservation, Cape Provincial Administration.

Event: Talk given on 'Conservation of Table Mountain' at annual half-day seminar of the Institute of Municipal Engineers of Southern Africa.

Date and venue: 27-10-93 in Bellville.

Event: Guided tour of Orangekloof Nature Reserve by the Parks and Forests Branch of the Cape Town City Council to point out practical management issues.

Date and venue: 11-11-93 at Orangekloof Nature Reserve.

Event: Workshop to further explore legal and administrative models to manage use of the CPPNE. Present were representatives from the Victoria and Alfred Waterfront Company and Cape Nature Conservation and Environmental Conservation section, and specialists in environmental planning, management consultancy and environmental law.

Date and venue: 17-11-93 at the University of Cape Town.

Event: Circular #3 was sent to 234 I&APs to inform them of the anticipated dates that the draft, popular and final reports would be made available.

Date: 29-11-93

Event: Circulation of *'Internal Draft Policy for Managing the Protection and Use of the Cape Peninsula Mountain Chain'* to specialists to comment **on.**

Date: 10-12-93

Event: Circular #4 was sent to 234 I&APs to give the new schedule for public participation, and to explain the delay in the production of the draft reports.

Date: 28-01-94

Event: Circular #5 was sent to 300 I&APs providing the dates and venues for the public presentations; what the draft report would consist of; and how I&APs could provide their input to the draft report.

Date: 28-03-94

Event: Production and distribution of the popular report in English, Afrikaans and Xhosa to 80 public libraries (all public libraries and tertiary institutions in the Cape Metropolitan Area).

Date: 09-04-94

Event: *'Draft Policy Report for the Multipurpose Use of the Cape Peninsula: Volume I: The Main Report and Volume 3: The Kahn Report'* distributed to the 350 I&APs and to 80 libraries (all public libraries and tertiary institutions in the Cape Metropolitan Area).

Date: 09-04-94

Event: Articles in *Weekend Argus*, 'Expansive plans for Fairest Cape' and

'UCLvs eco-report hits the streets next week', outlining the report contents and giving dates and venues of public meetings.

Date: 09/10-04-94

Event: 'Draft Policy Report for the Multipurpose Use of the Cape Peninsula: Volume 2: Appendices' distributed to 80 libraries (all public libraries and tertiary institutions in the Cape Metropolitan Area).

Date: 26-04-94

Event: Press releases in the *Southeaster*, the *Plainsman* and *City Vision* about the public meetings to be held in Khayelitsha, Langa, Mitchell's Plain and Athlone.

Date: 01-07 May 1994

Event: Meeting with Managers Forum to clarify and obtain comment on the Draft Policy Report. 19 attended.

Date and venue: 09-05-94 in the Conference Room, the Newlands Forest Station.

Event: Meeting with the public about the Draft Policy Report. 2 people attended from the Llandudno Local Council.

Date and venue: 09-05-94 at the Hout Bay Museum.

Event: Meeting with private landowners about the Draft Policy Report. 6 people attended.

Date and venue: 10-05-94 at Fish Hoek Senior High School.

Event: Meeting with 11430s about the Draft Policy Report. 6 people attended

Date and venue: 11-05-94 in Zoology LT2, University of Cape Town.

Event: Circular #6 was circulated to 300 I&APs to remind them of meetings on 23 and 24 May 1994, and that comments should be submitted by 3 June 1994.

Date: 13-05-94

Event: Meeting with the public about the Draft Policy Report. 27 people attended.

Date and venue: 14-05-94 at Alexander Sinton High School, Crawford.

Event: Meeting with landuse planners. 6 people attended.

Date and venue: 16-05-94 in Zoology LT2, University of Cape Town.

Event: Announcement of public meeting at Ocean View in the *Cape Times*.

Date: 17-05-94

Event: Meeting with the public about the Draft Policy Report. 16 people attended.

Date and venue: 18-05-94 at Ocean View Civic Centre, Ocean View.

Event: Meeting with the public about the Draft Policy Report. 5 people attended.

Date and venue: 21-05-94 at Civic Hall, Langa.

Event: Meeting with the public about the Draft Policy Report. 6 people attended.

Date and venue: 21-05-94 in Plicro flail, Eastgate, Mitchell's Plain.

Event: Meeting with the public about the Draft Policy Report. 8 people attended.

Date and venue: 23-05-94 in Lecture Theatre 8, Cape Technikon.

Event: Meeting with the public about the Draft Policy Report. 30 people attended.

Date and venue: 24-05-94 at Claremont Civic Centre, Claremont.

Event: Meeting with the public about the Draft Policy Report. 4 people attended.

Date and venue: 28-05-94 Site 13 Hall, Khayelitsha,

Event: Meeting with the public about the Draft Policy Report. 15 people attended.

Date and venue: 01-06-94 Thembani J.P. School, Langa.

Event: Meeting with the public about the Draft Policy Report. 9 people attended.

Date and venue: 01-06-94 Langa Library, Langa.

3. COMMENTS RECEIVED IN RESPONSE TO THE DRAFT POLICY REPORT

The comments below are those recorded in the data-base up until 30 June 1994. Comments received thereafter are attached as separate documents.

PRINCIPLES ON WHICH PROPOSED POLICY IS BASED

The principles are basically **urban and political in character. One of the most striking aspects of the Peninsula is its contrast - open and wild areas adjacent to urban and developed areas. The principles are fine for developed, or partly developed areas, but do not sufficiently relate to the wild areas. I feel that the word "contrast" should be included, or another word which would underpin the wild character of much of the area should be added.**

(Mr PM Adams)

I am not sure it is practical to have sets of goals and target dates. These are likely to relate mainly to the removal of alien vegetation. In some areas, like Sandy Bay, there is so much of it that I doubt it is worthwhile removing it. Besides, the area is still beautiful.

(Mr P Dennehy)

Responsible use should include a statement to the effect that such use should not affect the sustainability (3.1) of the natural resources.

(Mr Z Erasmus)

Need to add integrity, integration, security and probably more. This list should not be finite.

(Mr B Oberholzer)

Inadequate recognition of the CULTURAL values/component underpinning your stated principles and, indeed, most of the reasoning and conclusions.

(Mr S Townsend; member; CAPE IIY5TITTITE OF ARCHITECTS)

I would propose that three additional principles be added: 3.7 IRREPLACEABILITY (If there is such a word). The natural assets of the Cape Peninsula are unique (e.g. endemic plants and birds, particular landscapes) and cannot be re-created elsewhere (or from elsewhere). 3.8 IRREVERSIBILITY: It must be accepted that once certain changes are allowed in the land use of the Cape Peninsula these are often irreversible (e.g. natural ecosystems are completely lost). 3.9 GRADUALISM: The point needs to be made that sometimes in the long term view a proposed activity/development which in itself is not really damaging in the Peninsula will have to be rejected because it will set a precedent for a chain of similar actions.

(Dr JAW MacDonald; Representative; SOUTH AFRICAN NATURE FOUNDATION)

PARTICIPATION: cannot only be left to landowners and residents. Experts and education specialists need to be well represented. I feel that although public opinions and rights are essential, the public needs guidance from experts and education specialists.

(Ms 5 Howes)

3.3 Change term 'efficiency' to 'effectiveness' Wherever the term 'management' is used, the term 'development' should be also included e.g. 'the effective management and development of the use of the Cape Peninsula'.

(Pis C Burgess)

Paragraphs 3.4 to 3.6 are extremely important but as I see it the effective devolution of power, both fiscal and plenary, is crucially important. If a look is taken at the despoliation of the mountain chain it will be seen to be the result of mainly FATCAT development and the enormous sums of money being thus negatively invested are not contributing in any meaningful way to the economic/sub-economic housing needs. And because 3rd Tier Government has no teeth it is able to hide behind 2nd Tier reasoning that 2nd Tier will over-rule local decisions and equally well if the 3rd Tier does make an extremely unfortunate decision usually in favour of some FATCAT development 2nd Tier will wash its hands of the issue and piously say - it does not wish to interfere in the 3rd Tier decision-making. A classic game of cat and mouse. The political battle for the devolution is still to be fought and hopefully won before we can even begin to think we have a democratic dispensation.

(Mr TF KEAIYB; Representative; FI511 HOER ALIEN VEGETATION COIYTROL GROUP)

'Financial viability is a crucial element of the 'efficient use of financial resources' and is not highlighted in the report.

(Messrs J Levy and L Coelen; REPRESENTATIVES; MOUNTAIN CLUB OF SOUTH AFRICA)

3.3 Efficiency:

Effective management can only be implemented and sustained by the use of a formal management system. I suggest that an 'Environmental Management System' code of practice such as BS7750 or equivalent be employed to control and monitor all of the criteria that will form part of the overall long-term management requirement.

(Mr P Gray)

1. Transparency should be a principle.

2. Environmental education is neglected in the principles.

(P Salter; Representative; SIMON'S TOWN FLORA CONSERVATION GROUP)

More should be said about the mechanisms of adaptability - without well delineated mechanisms for reviewing adaptability, could undermine the strength of the final policy.

(Dr GW Davis)

The principles are well recognised in environmental planning but are sometimes contradictory e.g. safeguarding for future generations - is this an attainable goal in the face of development? 'Public Participation' - good principle but we need to know the degree or 'validity' of public comments:- Who is the public - weighting of professionals/experts.

(Mr E Manus)

Sustainability is the most critical. Equity, efficiency and accountability are very important. Participation is essential. Adaptability as a principle is queried. Other principles need to be included: sustainability should serve as the guiding principle. Equity of access to a vulnerable environment cannot be unconditional. Subscribing to a code of responsible use is essential. Efficiency can only be achieved by direct assumption of responsibility i.e. no blanket contracting out, but a clear line of communication and accountability between authority and workforce. Accountability also implies that funds are not used inefficiently, e.g. through bureaucratic and technocratic empire building without being overly concerned with day-to-day management issues. Participation should include a mechanism whereby inefficient or irresponsible office bearers are obliged to face criticism from public and be liable to both political confrontation and judicial procedures leading, in extreme cases, to removal from office. Adaptability should always be possible, but not at the expense of transparency; eg. changes should happen as a function of the TEM procedure, not via clandestine maneuvers as we believe has sometimes been the case with the COOHNR Advisory Board. Principles that need to be included are transparency (see above) stewardship-consciousness and environmental education. Ideally, the consciousness of stewardship would entail a set of sentiments, attitudes, duties and responsibilities that the actions of all managers, caretakers and users need to be imbued with, so that present and future generations can exercise their right to enjoy this heritage site in its optimal condition. Education and interpretation leading to a love and understanding of the Peninsula's natural environment and the sustainable use of its resources should underly all undertakings and be made available to both users and workers.

(THE CHAIRPERSON OF RLCG; REDITILL LA1YDOW1YERS CONSERVATION GROUP)

How would non-Capetonians be able to participate - would it be only at national level, now that the 9 regional governments have come into being? If the Cape Peninsula is considered a national asset, how would interested persons/parties outside the Western Cape be able to provide input - only at the national parliamentary level?

(Ms CM Russell)

1. Cultural values are not sufficiently incorporated.
2. Social values regarding the law and administration (and the fact that the law exists) of land and development etc. are not incorporated.

(CITY OF CAPE TOWN: CITY PLANNER)

The six principles are acceptable.

(Mr C Sullivan; Chief Executive Officer; WCRSC)

You are putting in place more and more structures that confuse and undermine... We want the public to be involved more fully - not boffins that are impractical.

(Ms S Louw)

Sustainability should be broadened to include 'any policy will be based on a sound ecological understanding of the ecosystems and biota concerned'.

(P Ivey)

Although I think the principles are valid, I would like to see: 'EQUITY' extended to include some element of 'JUSTICE' - the recognition of the need for redress.

'EFFICIENCY' - I would like to see spelled out in more detail along with 'ACCOUNTABILITY'. What elected local government bodies will be involved and how will they connect with regional/national structures.
(Ms D Salters)

PRIMARY CONCLUSIONS OF MIS INVESTIGATION

Have we not got enough information available for a management plan to be drawn up? What further information is needed?
(Mr PM Adams)

If most of the Peninsula, as described, is to be defined as the Cape Peninsula Heritage Area, does the basis of this definition not mean that Robben Island, as a sensitive and culturally rich area, should be included? i.e. both areas managed under the same legislation, ultimately, by the same organisation, for the same objectives.
(Mr Z Erasmus)

Too great an accent on protection, rather than sustainable usage increase management, which is very much a future 'fait accompli'; 5x Tourism increase in next 10 years.
(Mr N Malherbe)

Too much accent on protection, rather than sustainable usage increase management. Great increase in tourism anticipated in the area under the jurisdiction of the Cape Peninsula Heritage (Authority).
(Mr C Adams)

- 1. Apart from the problem of divided control, insufficient funds is also a serious handicap.**
- 2. Inclusion of the entire area (p13) is not realistic. Urban fringe areas should be excluded and controlled through formal land use plans by local authorities.**
(Mr ND (Ieldenhuys; Executive Director: Southern Parks; NATIONAL PARKS BOARD)

While the issue of the 'plethora of controlling authorities having jurisdiction' is identified, the conclusions and recommendations do not adequately address the problem. This issue should be more fully addressed, especially in the light of the proposed larger area, which will include even more controlling authorities.
(Mr B Kopfer)

The last of the four primary conclusions should be de-emphasised related to the other 3: it is not adequate knowledge which is preventing us from coming up with adequate management measures for the Cape Peninsula. For example we have known since the 1940's that aliens threaten the natural areas - what we have lacked is the will and the where-with-all to achieve effective central campaigns. A qualifying phrase is needed e.g. 'although in general information is not the major limitation to effective management'.
(Dr LAW MacDonald; Representative; SOUTHERLY AFRICAN IYATURE FOUYDATIOIY)

Pig 2 (p 13) does not include the Peninsula's richest cultural areas - the Harbour; Rondebosch, Mowbray, Claremont, Wynberg, Constantia, Tokai, Muizenberg residential areas. I am worried that this indicates a conclusion that the natural environment is more important than the cultural environment. Also why are the wetlands and waterways of Rondevlei, Sandvlei and Seekoevlei excluded. All the areas that have been excluded on Pig 2 are the best areas to educate from, by that I mean they provide much educational material.

(Ms S Howes)

1. Is there any reason why Sandvlei and the Westlake wetlands are not included as part of the CPTIA. Surely they are areas of conservation and development (recreational and ecological) value and certainly link directly to the mountain chain.

2. Lack of public awareness of the importance of environmental issues generally in SA.

(Ms C Burgess)

As primary findings I find these too superficial to be useful.

(Prof G Branch)

1. Not enough emphasis on 'environmental degradation' e.g. Pollution (waste, contamination, industrial and vehicle smoke and gases).

2 Indiscriminate development.

(Mr P Gray)

Areas already developed or scheduled for development should be excluded from future P.N.E. Concentrate on the unspoilt areas.

(Mr Ed' van der Horst)

1. The Western and Northern boundaries are not clear.

2. We do have regulations for urban expansion and control of alien biotic invasion.

Where have they gone wrong?

(Mr J Stegmann; Dust Chairman; WPPPA TABLE MOUNTAIN BAEFPRTH TRUST)

Management guidelines accepted by administrator in 1988 which were not implemented should be implemented now as an interim measure.

(P Salter; Representative; SIMON'S TOWN FLORA CONSERVATION GROUP)

I believe the conclusions should reflect more closely the underpinning principles, in general they are far too vague. The conclusions seem okay, but in #2 I think it is necessary to relate the threats of increasing population and urban expansion to underlying socio-economic conditions to emphasize the link between human and environmental welfare.

(Dr OW Davis)

I would recommend re-phrasing conclusion 4.1.4 It may be correct that existing information is inadequate but this is the *same* excuse the USA is using not to act on global warming. A positive statement which ends 'further data is required to improve these plans' may prevent authorities from avoiding responsibility. A conclusion could be that - given population pressure in a rapidly expanding metropole, failure to act now may mean that deterioration will become irreversible or irrecoverable.

(Mr J Fowkes)

An agency, which should ensure that the recommended policies are actioned, should be positively identified and 'charged' with the task.

Comment:

The study report could be treated with a 'thank you, now please go away' response. One cannot rely on the public for compelling the report's implementation.

(Mr W van Warrnele)

No mention is made re: established and existing cultural landscapes nor sociocultural environments.

(D Thomas)

1. The criteria for inclusion of certain areas are unclear: topographical, political, controlling authorities?
2. The unique coastline from Camps Bay to Changer Bay certainly forms part of the natural heritage of the area.
3. Amend either the name 'CPHA' or adjust the boundaries to reflect this. Are we dealing with the whole Peninsula cultural landscape or just a portion thereof? The name should reflect this.

(Ms S ffustwic.k)

I'm not sure that the existing information base is inadequate. Perhaps it is just a question of centralising it(?) Apart from this query, primary conclusions VALID.

(Mr If Gold)

Conclusions could have emphasised that the fundamental threats and obstacles to the administration of the CPPNE include the abuse and neglect of our natural heritage by its very custodians. The most serious hindrance to effective management has been the lack of the responsible authorities' commitment to the protection, conservation and care of the CPPNE and the lack of political will to implement legal and other constraints which are actually in place.

(THE CHAIRPERSON OF RLCCI; ; REDHILL LANDOWNERS CONSERVATION GROUP)

1. p30 (The existing information base). There is sufficient information! The problem is that it is not readily available - it is all over the place and much is in people's heads. What is required is a brain storming session followed by collation of the data into an easily retrievable format. In this respect there is already an extensive CIS based databank at Forestek.
2. How the management of, in particular, 'transitional areas', would be carried out, appears not to have been considered at all.
3. The historical process of settlement (occupying and using the landscape; urban development, agriculture, forestry) seems not to be understood.
4. Agree boundary of CPPNE requires modification, but inclusion of major parts of the urban fabric is NOT ACCEPTABLE AND THEREFORE OPPOSED, as per figure 2 page 13 of main report, because:-

- Inadequate explicit and rational argument provided;
- Lack of objective evidence for extending boundary into urban areas;
- Controls proposed for CPPNE are totally inappropriate for urban areas, where built form and future dev. criteria need to be addressed;

- Inadequate consultation with residents and local authorities;**
- **Impact on existing legal rights will inevitably delay and complicate efforts to implement improved planning and management of current CPPIIE;**
Existing laws (e.g. Seashore Act, Sea Fisheries Regs, LUPO) may not be adequate and the mere substitution of control by a new authority may not achieve the desired goals;
 - **Expansion of area of operation does not necessarily imply optimal management - need sound management policy and its enforcement.**
- (CITY OF CAPE TOWN: CITY PLANNER)**

Unregulated urban expansion - Page 29 To refer to unregulated urban expansion is incorrect. A legal framework exists within which urban expansion takes place. It would be preferable to refer to inadequately regulated urban expansion.

(Mr C Sullivan; Chief Executive Officer; WCRSC)

Human population increase? - Humans should be seen as part of the environment, not separate. Societal benefits - Only whites will be able to benefit from the use/development of the peninsula.

(ENVIROIYMENTALIST SOCIETY (EIYSOC))

The focus of this study should be changed, as the Primary Conclusions are "Mountain" based, and create a certain bias to the conclusions.

(V Marincowitz)

Fundamental threats should be broadened to include: 'lack of public knowledge about the importance of the Cape Peninsula as a world resource. It is very important to educate both leaders and general public.

(P Ivey)

More focus on push to declare Peninsula a World Heritage Site. Tourism needs to be carefully balanced with sustainability of the environment.

(KOMMETJIE EIYVIROIYMENTAL AWARENESS GROUP)

The CPPNE idea is good but just as important for preservation are natural corridors in the built environment and along the coast within municipal areas. A proper MOSS Scheme is needed in Simon's Town (and other urban areas).

(Mr D Steclzinan)

1. As finally defined (may be extended to include Robben Island, and, Diep River systems)

2. 'info base inadequate' - PROBLEMATIC - some facets can be planned for.

(Mr JE Avis)

re: 'fundamental threats', add:

- (¹) inappropriate, or inappropriately designed or located recreational and/or touristic facilities - e.g. current plans at Cape Point.**
- (ii) Squatting - particularly if not sited 'out of site and if basic services (particularly sewerage) are not provided.**
- (iii) Release of raw sewerage into inshore coastal waters**
- (iv) Littering - which should become heavily punishable (and policed) offence.**

(v) Inappropriately sited (e.g. flout Bay - Llandudno area) and/or designed (e.g. Disa Towers at foot of Tabel Mountain) buildings or building expansions.
(Mr K van ffuyssteen; Representative; UNIVERSITY OF STELLENBOSCH - GEOGRAPHY DEPARTMENT)

Any management plan and management structures must come out of elected, not appointed, bodies broadly representative of local people - residents' groups, interest groups as well as political parties.
(Ms D Salters)

PRIMARY RECOMMENDATIONS OF TIM INVESTIGATION

I believe the saying 'Why protect an area to the exclusion of people'. However, I am suspicious that 'public review' could go too far to the point of losing 'sustainability. We must be reasonable but sustainability is paramount. A comprehensive fire protection system (far more firebreaks) must be above all the most important single factor. Such a plan also needs public scrutiny. The last lot did not work.

Alien vegetation, public participation, etc are important but must be secondary to fire fighting. The biggest single factor in the firefighting procedure will have to be the speed to the point of ignition. I did years of forestry firefighting. Any fire caught within 10 minutes of starting can usually be swiftly controlled. Detection is No 1. We cannot live with any system, which will take more than 10 minutes to arrive for action. P.S. This can be achieved.
(Mr D PVIghtman)

A campaign to enhance awareness of what an asset the Cape Peninsula is, is not necessary. Most people know it.
(Mr P Dennehy)

Utilise management structures in place (UTNE), and alter, rather than set up a whole new CPPNE snowboye
(Mr N Malherbe)

The consultants, I believe, now need to spell out a plan of action for the study area to take the initiative further - in our *life-time*
(Mr B Oberholzer)

The nature area is a resource and should be treated as such. It has value and that value can be increased/decreased depending on actions or lack of actions by man. The cost/benefit of all actions should be identified. This includes income, direct and indirect, and also downside effects.
(Mr CB Mitchell)

N.B. Proviso: that duplication of present structures be avoided. Rather expand on existing structures and include all stakeholders i.e. communities.
(Mr C Adams)

Inadequate appreciation (or examination) of the implications of the management processes suggested/implied.
(Mr S Townsend; member; CAPE INSTITUTE OF ARCHITECTS)

Because of the national and international importance of the area, as identified by this study, as well as the policy, objectives and current strategy for its future, the proposals from this study should not only be considered by the Premier of the Western Cape, but also by the National Parliament and Legislation, with final decision by the latter. This should be based also on public review and consultation process which formed part of your study.

Urban fringe areas surrounding CPPNE would be better controlled through formal and acceptable landuse plans, arrived at providing buffer areas and acceptable development adjacent to the CPPNE. This is the task of the local authorities/metropolitan authorities in close consultation/agreement with the CPPNE authority.

(Mr ND Geldenhuys; Executive Director: Southern Parks; NATIONAL PARKS BOARD)

Consideration should be given to setting up an Intermediate Body immediately to commence management of the Cape Peninsula Heritage Area whilst this Draft Policy is being studied and debated.

(Mr Alf Fourie)

If the attainment of this single critical objective is impeded - for instance over dispute over fringe areas, the jurisdictional boundaries, private land etc., we would suggest that these are aspects which could be held over for attention after an Authority is in place.

Even the CPPNE as presently delineated could serve as a beginning under the umbrella of an Authority set up by enabling legislation and able to negotiate the purchase of land, raise funds and build up public confidence, etc.

(Mr J Ifale; Representative; SWARTYCLIP ALIEN VEGETATIOIY ERADICATO.RS)

The Premier of the Western Cape should appoint an Interim Management Committee to ensure that the UCT recommendations are implemented speedily. This Management Committee to report to the Premier.

(The Secretary; ; TABLE MOUNTAIN AND SILVERMIYE NRAE)

The recommendations should be balanced against the most urgent needs of the area. The idea of a strategic implementation programme should perhaps be explored e.g. 1st step - effective management/control of existing CPPNE area. 2nd step - setting in place an interim Administration and Control Authority (concurrent with above) 3rd step - The above Authority to pursue the idea of a Cape Peninsula Heritage Area (see comment on Part B no 5).

The existing functions of the CPPNE MAC (page 1.2 of Appendix 1) and the management guidelines as accepted in 1988 (p 3.6 of Appendix 3) would seem to be adequate as provisions - the problem would seem to lie with the inability to act upon them which would seem to rest solely with the MAC - possibly through lack of support from above in the CPA to impose guidelines upon Local Authorities.

PART B NO 5

In the meantime, the need for effective management and control within the existing CPPNE Area is so urgent that serious thought should perhaps be given to strategising the recommendations by firstly setting up an Interim Heritage Area Authority to take

over full administrative management and control only of the existing CPPNE area - plus minor required investigations and negotiations to extend its control over the full Heritage Area as currently proposed.

The recognition of the need to consider the Cape Peninsula as an ecological entity (marine to mountain) is commendable as this is essential to ensure effective management and control of what is rightly termed a heritage area of international importance.

I do however, consider that it will be a complex and very time- consuming process to gain support for the full recommendations from the various local and government organisations administering the existing urban areas; let alone the severance of the catchment areas from the eastern riverine systems and the arbitrary northern and eastern boundaries of the proposed Heritage Area. I could see an enormous amount of negotiation needing to take place with the respective local authorities and the future metropolitan authority before any form of consensus will be reached on these issues.

In the meantime, the need for effective management and control within the existing CPPNE Area is so urgent that serious thought should perhaps be given to strategising the recommendations by firstly setting up an Interim Heritage Area Authority to take over full administrative management and control only of the existing CPPTIE area - plus minor required investigations and negotiations to extend its control over the full Heritage Area as currently proposed.

(Mr P J Callaghan)

P30 Primary recommendations - last paragraph... enhance awareness and acceptance amongst the public in general'.

(Councillors P Landen and V Ifabalin; Councillors; FISH HOEK MUNICIPALITY)

- I. Implementing the reports recommendations will require an Act, as the report points out. The report has been commissioned by the Administrator (now the Premier, I presume). The consultants could explore the possibilities of the report requiring President-in-Council approval, given that it requires an Act and will involve central government finance (and that Table Mountain is a national, if not international asset). Should the Premier decline to accept the report's recommendations, the consultant's exploration could be justified.
2. The report could include a request that, in the interim before decision, a moratorium be placed on all development proposals.
3. The Premier should be requested to decide on the report's recommendations within a relatively short period of time, say 6 months. This would benefit the moratorium proposed in 2 above.

(Mr D Wheeler)

The fourth recommendation should be added to the effect that ' the current STATUS QUO must not be allowed to continue in the interim phase before the recommendation of this report can be implemented. In the interim period an EXECUTIVE AUTHORITY should be outside of any of the excessive management control of the ineffective CPPNE-MAC ADVISORY BODY. This interim authority must be tasked with ensuring these recommendations are implemented.

(Dr LAW MacDonald; Representative; SOLITHERY AFRICAN YOUTH VRE FOUNDATION)

As primary findings I find these too superficial to be useful. The recommendations are politically correct but hardly inspiring as a set of correct steps that need to be taken.
(Prof G Branch)

It is unlikely that the Premier of the Western Cape Region would give this report a higher priority than for example the National Parks Board would.
(Mr L Liebenberg)

They fail to address the important point of areas which are ecologically sensitive and also subject to intense pressure from an eco-tourism point of view.
(Whitelaw; Representative; CAPE BIRD CLUB)

1. The way in which the first primary recommendation is worded gives the impression that the consultants and hence the public must automatically accept any changes made by the Premier - this is unacceptable.
2. The probability of all those involved in controlling and managing the use of the Cape Peninsula of adopting the policies with immediate effect is unlikely given the 'bureaucratic' nature of the organisations involved. It would be better to recommend that a specific task force or interim body be established with a mandate to implement the recommendations during a specific period - particularly regarding the formulation of the 'Statutory' body. Other items may have to be addressed on a priority basis whether financial and skill resources available.

3. We believe an action plan is essential to ensure that the proposals are progressed.
(Messrs J Levy and L Coelen; REPRESENTATIVES; MOUITYTAIY CLUB OF SOUTH AFRICA)

1. A structured campaign should be part of an agreed management plan and must include local authorities/municipalities.
2. Halt/Moratorium on any developments unless they follow professional recommendations IEM etc.
3. 'Minimise environmental losses' is too soft - suggest environmental degradation e.g. pollution etc.
4. PLEASE PLEASE focus on the OLYMPICS as incentive for action.
5. No time scales recommended! This is vital for the implementation of action plans and more importantly the revision and implementation of legislation.

(Mr I' Gray)

Revise PIN boundaries first.
(Mr EJ van der Hoist)

Add 'cultural' to the last sentence of the 1st recommendation. It is important to include cultural resources in the recommendation to ensure that they are placed on an equal footing to natural resources and receive proper consideration in the management of the CPPriE.

(Messrs Lutsch, Coetzee, Cowan)

I would like to see embodied in the recommendations a strong statement that the creation of the single statutory authority should take place within a given timescale once it has been presented to the Western Cape Premier. I would suggest that the necessary legislation be introduced to the national assembly within 12 months and

should be enacted within 6 months thereafter. Alternatively, the Western Cape Assembly should at least require the existing bodies of the CPR= to act within the policy recommendations with immediate effect with the view to full adoption through the national legislation within 3 yrs maximum.

(AN Starke)

Until such time as a new management authority is in place, 1988 guidelines should be implemented immediately. Specific recommendations re: inclusion of Botha's Camp, Cilencairn Mountain, Simon's Town Waterfall area should be made. World Heritage status for Peninsula should be sought.

(P Salter; Representative; SIMOIY'S TOWN FLORA COIYSERVATIOIY GROUP)

Sustainability, equity and efficiency are hinted at, but the remaining three seem not to be embedded in the recommendations at all.

(Dr (2W Davis)

'Maximise societal benefits - minimise environmental losses'(p.30) - How about:

'Maximise environmental benefits and minimise societal losses'?

Turn the concept of 'people first' on its head - help to get across that the environment is the basis from which societal good comes must be treated as such. etc...

To avoid this document becoming just another in a long line of policies it needs to be followed up. Implementation needs to be ensured.

(Mr E Tilanus)

1. "Should be adopted with immediate effect' should be emphasized - time is running out

2. The link between societal benefits from a well-managed environment both at the economic and spiritual levels should be highlighted.

(Mr DJ McDonald)

NO mention is made re: established and existing cultural landscapes nor socio-cultural environments.

(D Thomas)

First paragrah should read: "...This is to contribute to a prosperous, healthy, historically rich and scenically attractive Cape Peninsula'.

(Ms S ffustwick)

Recommendations are not appropriate in that:- (A) the proposed policies will take considerable time to be implemented. Recommendations which are implementable in the short term are essential: the problems that this study should be addressing are not merely of an academic nature; the threats continue to impact negatively on the bio diversity and scenic beauty of the Peninsula. The following proposals need to be included to address ongoing problems:

- i. The boundaries of the CPPN should be extended to include the coastal and marine environment from Camps Bay to Muizenb erg as well as land at Botha's Camp and other areas of conservation importance which will serve to optimise the boundaries of the natural environment and facilitate conservation management of natural ecosystem;

The Western Cape Premier, having the powers and duties of the former Administrator, should issue a directive (which he is empowered to do in terms of the Environment Conservation Act) that all development and subdivision proposals for land within the CPPNE be required to undergo the IEM procedure, as well as other relevant directives, and that these be registered on the title deeds of properties within the CPPNE,

That the Premier use the further powers vested in him by the Environment Conservation Act and withdraw the control and management of publically owned land within the CPPNE from the various local authorities and assign them to Cape Nature Conservation and Museums. The rationale behind this proposal is that the Kahn Working Group's assessment makes it clear to us that only CNC&M qualify for such functions and moreover that CNC&M is the only body whose functions are exclusively related to conservation and interpretation and also that it is the only body that employs marine as well as terrestrial scientists and conservation officers. It is also this Province which is the official custodian of the natural environment. (Kirstenbosch Gardens, Klawer Valley and other land which the Kahn Working Group accepted ought to remain under the control and/or management of various authorities should be excluded from this directive),

iv. The Premier should seek funds from Parliament and with the concurrence of the Minister of Finance render financial aid to CNC, to be used solely for the CPPNE for management, restoration and education/interpretative facilities.

(B) The 'primary recommendations' contained in this report appear to stem from an attempt to give status and importance to the area's function as a tourist and recreational amenity as well as a Heritage Site deserving of protection and conservation. What needs to be established is a clear hierarchical ordering of policy imperatives within which management for sustainable use can be developed. Allowing the immediate needs of tourism to dictate the directions of management could result in sustainability being irrevocably jeopardized.

(C) The report neglects to recommend that World Heritage Status for the Peninsula be sought.

(D) Inadequate attention is devoted to the need to make the Cape Peninsula Heritage Area the venue for special educational and interpretive facilities designed to awaken an understanding and respect for the resources and uses of the natural environment.

(THE CHAIRPERSON OP RE,CG; REDHILL LANDOLVIYERS CONSERVATION GROUP)

Unavailability of Vol. 2 of your report when we went through this document was a major drawback.

(Ms GPI Russell)

1. A proper understanding and fuller statement of how the CPHAA would work, particularly in developed parts of the City, is needed.

2. No mention of financial restrictions.

3. Additional primary recommendation: If the principle of sustainability is to underpin the proposed policy, then it is vital that implementation of policies is based on the

best available scientific data. It is thus essential that the compilation and administration of a CGS based information system becomes a primary recommendation. Without it, the implementation of the majority of the policies will be impossible and scientifically unsound.

4. p30 (Use of the Peninsula) There would be conservation areas where this would not apply.

5. p30 (A properly structured ...) Reword: A properly structured and co-ordinated campaign

(CITY OF CAPE TOWN: CITY PLANNER)

Page 30 - In the first recommendation cultural resources should be included i.e. the area's unique set of natural and cultural resources.

(Mr C Sullivan; Chief Executive Officer; WCRSC)

Recommendations should be broadened so as to include the greater metropolitan area. As it is, the Peninsula is owned mostly by whites. Why should blacks on the Cape Flats support a policy that is clearly aimed at saving fynbos and scenic views which are basically in the backyards of whites?

(EIVIRONMEIYTALIST SOCIETY (EISOC))

The report has been well thought out and prepared and we are in agreement with the summary of recommendations. Some method or methods/procedures must be put in place to ensure that the report is not merely acknowledged and then put away to gather dust. Immediate and early action must be taken on many of the recommendations, particularly in the light of the very rapidly growing population of the Western Cape areas which abut on the Cape Peninsula which is its natural and obvious recreational area.

(SIMON'S TOWN RATEPAYERS' ASSOCIATION)

Only the 'mountain' viewpoint is discussed.

(V Marincowitz)

Use of the Cape Peninsula should be managed on a sustained basis, adhering to a plan which is based on sound ecological principles

(P Ivey)

MOSS Schemes needed to maintain and restore natural corridors in urban areas.

(Mr D Stechman)

ADD ongoing maintained information system is needed to formulate ongoing and refined plans.

ADD an implementation commission/committee/working group be established to give effect to this report.

(Mr JE Avis)

It is inadequate to make the recommendation 'a damage limiting exercise' p.30 line 18 and 19. The recommendation must be far more positive. The environmental losses can and must be reversed (see p.41 line 1 where you talk about restoring cultural sites).

(Dr J Gardner; Chairman; CAPE WETLANDS TRUST)

To provide a model for a holistic approach to environmental and social needs such that the quality of life is enhanced for all while our demands on the environment are diminished by a major shift to conservation of resources, use of alternative technology, reduction of sources of pollution.

(Ms D Salters)

What is hidden behind the term 'maximum societal benefits': 'controlled' bark stripping, 'controlled' squatting, 'restricted' housing developments?

(Mr I le Roux)

CONCLUSION CONCERNING BIOLOGICAL DIVERSITY

p. 36 Alien vegetation should be defined.

What about oaks, pines?

(Mr LC McEwan; Chairman; LAKESIDE/MUIZENBERG RATEPAYERS ASSOCIATION)

This aspect is not understood or appreciated by the general public.

Much needs to be done in the way of education and public awareness campaigns. Perhaps this aspect could be more fully addressed.

(Mr B Kopfer)

After the word 'richness' in the first phrase should be added 'and uniqueness' - it is this aspect which confers the irreplaceability of the Cape Peninsula natural ecosystems (more so than its richness which is equalled by other areas within the fynbos biome). I believe this issue is so important it needs stressing in the main conclusion.

(Dr LAW MacDariald; Representative; SOUTH AFRICAN NATURE FOUNDATION)

It is my belief that it is almost too late to save the situation as far as biological diversity is concerned. A good example is the Fish Hoek area where housing in the wetlands and sandhills has done tremendous damage.

(Mr 4. IM Fudge)

It does not take account of the high population density which will increase inevitably.

A principle should be established as to management of water resources for development in relation to conservation.

(Whitelaw; Representative; CAPE BIRD CLUB)

Documentation required to support your statements.

(Messrs Lutsch, Coetzee, Cowan)

Mention should be made of area of fynbos flora already lost in the Peninsula. Feasibility of restoration of fynbos flora to previously dense stands of alien vegetation, in time, requires more emphasis.

(P Salter; Representative; SIMOLY'S TOWN FLORA CONSERVATION GROUP)

The flora is certainly rich, but not the fauna - inclusion in the statement undermines its veracity.

(Dr GIV Davis)

Emphasize that biological diversity cannot be protected in areas zoned for convenience by factors other than its protection.

(Mr E Manus)

While the slopes of the mountain were historically covered by fynbos/indigenous vegetation, certain slopes have become altered landscapes with planting of alien stone pines, gums, vineyards, orchards etc and now constitute a significant element of the character, history and aesthetic/imagery of the cultural landscape. Biological purists should tread lightly in this regard.

(Ms S Hustwick)

The rarity and diminutiveness of the Cape Floral Kingdom in global terms (being only 0,04% of the world's surface and of which an area of 60% is said to have been lost since Van Riebeeck) appears to be overlooked. The fact that it is indeed possible and feasible to restore even dense alien stands to fynbos is not given sufficient weight. Appendix p. 14.16 to 23 on biodiversity is excellently done, among the best sections of the Report. But the Coastal and Marine Environmental Policy (p14.33) is hopelessly insufficient. We suggest that CNC Marine officers are contacted for advice.

(THE CHAIRPERSON OF RLCG; • REDHILL LAIYDOWNERS CONSERVATION GROUP)

What does the 'International Convention on Biological Diversity mean to the layman? Does it mean that rules and restrictions are going to be imposed on us by an overseas international group? I fear that we are going to be locked into something that could take away our present freedom to use and have recreation on our mountain.

(Ms S Louw)

The conclusion does not give sufficient emphasis to the dire situation faced by many critically rare species. The need for conservation of these species and the responsibility of both the authorities and the public to conserve them needs more emphasis.

(P Ivey)

More emphasis is needed on the uniqueness of Cape flora.

(KOMMETJIE ENVIRONMENTAL AWARENESS GROUP)

Set as it is a metropole, severe thereats require special measures.

(Mr JE Avis)

Existing plantations on very steep slopes should not be replaced after clear felling e.g. top compartments of Cecilia and Tokai. These compartments are usually not economical to exploit in any case.

(Mr P le Roux)

MOTIVATION CONCERNING BIOLOGICAL DIVERSITY

Needs to be more specific

(Prof JR Grindley)

It is not only the vegetation which promotes fires. Climatic factors also have a major influence, as well as topographical features.

(Mr Z Erasmus)

More emphasis should be placed on the benefits of the Cape Peninsula to the residents of the Cape Metropolitan Area.

(Mr R)

Inadequate regarding appreciation/understanding of the cultural and historical processes that have impacted on the environment and how these should be addressed.

(Mr S Townsend. member; CAFE INSTITUTE OF ARCHITECTS)

1) In the final section on 'threat status' (pp34-44), the phrase 'seriously threatened' needs to be qualified to show how uniquely high the level of threat is on the Cape Peninsula relative to areas of comparable size elsewhere in the biome or elsewhere in the world.

2) The impacts of alien invasions (e.g Argentinian ants, European Starling) needs to be mentioned here also.

(Dr IAN MacDonald. Representative; SOUTHERN AFRICAN NATURE FOUNDATION)

Fauna - invertebrates and birds are mentioned. Special motivation must surely be made in regard to threatened species: frogs and chameleons come to mind. A top motivating factor concerning biological diversity would, for me, be to ensure that threatened species of flora and fauna are not allowed to become extinct.

(Ms S Ifowes)

Many more examples should be given.

(Mr XI Fudge)

The public and the authorities need to be able to equate the value of this particular concern with other current concerns in SA (e.g. sanitation, housing, education etc.) Therefore some form of monetary or other scale of comparison needs to be adopted or used to form the basis of priority choices.

(Ms C Burgess)

Could add the fact that in terms of marine biota the Peninsula stands astride two major biogeographic provinces and is ideally placed for a reserve at the end of both.

(Prof CI Branch)

COMMENTS: p33 paragraph 7 - The total tourist expenditure in the Western Cape in 1992 comprised R1.6 billion.

(Ms P van der Spuy; Representative; SOUTH AFRICAN TOURISM BOARD)

1. No mention of the 'remnant' forests.

2. Can you substantiate the validity of traditional medicines?

(Mr P Gray)

On page 33: The biological and physical.....

The Cape Peninsula is not a great producer of natural products - natural stands of forest would only support very low levels of harvesting for traditional medicine or wild flowers. Food?? Aid is primarily alien species.

(Dr OW Davis)

Emphasize that Biological diversity cannot be protected in areas zoned for convenience by factors other than its protection.

(Mr E Ti/anus)

The language used is correct but possibly not appropriate if the document is to be used for a lay audience. e.g. 'endemic'; 'faunal'; 'faunal endemicity' - all these terms are not in the glossary.

(Mr J Powkes)

This section is well-presented, particularly the placing of the Cape Peninsula and its importance into a global context, without losing sight of the local and national issues.

(Mr DJ McDonald)

1. Query the 'reduced stream flow' (p34) This can be caused by indigenous as well as alien plants.
2. Query the 'unwise modification to rivers, streams and wetlands' (p34) This depends to a large extent on the viewpoint adopted.

(CITY OF CAPE TOWN: CITY PLANNING)

Page 34 - Because of the extensive development on AND THE MORE INTENSIVE USE OF THE CAPE PENINSULA ...

(Mr C Sullivan; Chief Executive Officer; WCRSC)

There are a few very specific statements here (e.g. 15 'hot spots', p 31), and also some very generalised statements (e.g. 'tourism largely attributable to'; 'There is a school of thought which considers..'; 'fires occur very frequently and cause considerable damage'). I realise that one can't pepper a report such as yours with author refs. - nor quote precise figures - but I have heard some doubts expressed about the validity/adequacy of some of these statements. I think it would help to counter these objections if some general indication of source could be indicated, as has been done elsewhere by quoting S.A. Birdlife International (top p.32) and the International Convention on Biological Diversity, for instance. I noted with interest that only one paper (Richardson et al on plant and animal invasions) from The Ecology of Fynbos (ed. Cowling 1992) has been quoted in the bibliography (App 2). The paper on plant diversity and endemism by Cowling et al on pp 62- 112 is particularly relevant to part 4.2 of your Report.

(H Taylor)

I do not like this word 'PROTECTED areas'. It means take away and restrict public from using it.

(Ms S Louw)

Further comparison of SA vs the rest of the world or Cape Floral Region vs other areas would serve to emphasise the uniqueness and the threat facing the flora of the Cape Peninsula.

(I' Ivey)

RECOMMENDATIONS CONCERNING BIOLOGICAL DIVERSITY

I would only like to comment on the proposed policy with regard to 'Biological Diversity' on page 37, line two and three which reads: 'Do not allow the expansion and replanting of existing alien forest plantations.' Even though I support 'not to allow

expansion', it is definitely not acceptable not to allow 'replanting' of existing alien plantations. The commercial production of timber in an environmentally acceptable manner, will enhance the landscape and tourism and is regarded as very important to supply renewable raw material to the local industry. Replanting in an environmental acceptable manner must therefore be allowed.

(Mr 011 von dem Bussche; Regional Forestry Manager, Western Cape; SOUTH AFRICAN FORESTRY COMPANY (Ltd))

PAGE 37: 1st paragraph: 'Do not allow the expansion and replanting of existing alien forest plantations' - no further expansion is in order - no replanting of existing plantations is HOT supported.

PAGE 36: last paragraph ".. all aliens plants that have been found to be invasive..°

- could you change to ".. all declared weeds and alien invaders..'

- this would specifically address the relevant species.

- others could be addressed by applying for registration

(fir P le Roux; Environmental Manager; SOUTH AFRICAN FORESTRY COMPANY (Ltd))

Not all alien plants found to be invasive, or known to invade elsewhere, should be systematically eradicated. Some stone pines, for example, should be kept.

(Mr P Dennehy)

A programme of controlled burns should be introduced whereby the fynbos does not become senescent. Small manageable compartments of 200ha should be created. Compartments should be planned in such a way that they serve as fire protection/control/management units.

(Mr Z Erasmus)

With this influx of low-income and no-income residents *in* the Peninsula, the value of alien plants for firewood must be recognised. If all are eradicated as recommended, this will be a disaster as the next source of firewood will be indigenous plants. Some form of wood-lot system, or other cheap source of firewood, should form a specific recommendation for investigation.

(Mr L Walter; Representative; FISff ffOEK RESIDENTS ASSOCIATION)

p. 37:

par 1: What about the Tokai forests?

par 3: Top priority

par 4: How feasible is this?

(Mr LO McEwan; Chairman; LAKESIDE/PWIZEIYLIERG RATEPAYERS ASSOCIATION)

Just don't come across TOO flexible please!

(Mr WI! Thomas)

Recognise up front that a visitor invasion is in the making - domestic, and overseas led, and have to engineer methods of taking visitors through the ecosystem with least effect thereon; raised walkways, rail tracks *etc.*

(Mr N Malherbe)

Too general and sweeping as a statement - reads more like a goal rather than a recommendation.

(Mr B Oberholzer)

With the onset of the anticipated increase in tourists the general infrastructure must be upgraded i.e. toilets, refreshment points etc.

(Mr C Adams)

For the same reasons given for 4.2.2, viz: Inadequate regarding appreciation/understanding of the cultural and historical processes that have impacted on the environment and how these should be addressed.

(Mr S Townsend; member; CAPE IIYSTITLITE OP ARCHITECTS)

The recommendations should be adapted for each of the proposed functional areas. As they stand at present, the recommendations apply mainly to the 'remote' and 'quiet' areas. e.g. alien vegetation is a major source of fuel and building material for disadvantaged communities and should be 'managed' rather than eradicated in certain areas.

(Mr B Kopfer)

Consideration should be given to include in the jurisdictional boundaries, Robben Island, all rivers from source to mouth and all wetlands and vleis.

(Mr All Pmule)

Suggest the following addition to the Principle Recommendation 'Any changes or actions which will or are likely to result in changes to land.'

(Mr PI Callaghan)

I do not think that it is wise to mention 'enhancement' of the biological diversity in the main recommendation on the topic. This is almost universally interpreted by a lay audience as an invitation for the introduction of alien species to an area. (Even though I know full well that was not intended by the reports's authors). If the authors insist on maintaining the concept in the conclusions then the final sentence of the 3rd bullet on page 36 should be altered as follows:

'Where feasible and desirable, re-establish populations of native species that have become locally extinct from the area' (re-introduce is an inappropriate and incorrect term).

(Dr IAW MacDonald; Representative; SOUTHERN AFRICAN NATURE FOUNDATION)

I feel that the geophysical environment should not only include the mountain and uninhabited areas. Human-induced disturbances in urban areas need to be looked at: the number of pets, especially cats (predators) that people have. A plethora of latter (cats) means a threat to garden birds, reptiles, amphibians and other creatures that delight the urban dweller.

NB: NO MENTION OF EDUCATION. Surely this is the best way to reach the public.

(Ms S Howes)

Extend Cape Point Nature Reserve to cover protection of all marine biota in representative agreed upon sections of the reserve.

(Prof CI Branch)

**Proposed Executive Body must have suitably qualified expertise in evaluating planning and socio-economic issues in order to achieve credibility
(INSTITUTE OF LANDSCAPE ARCHITECTS)**

COMMENTS: The local authorities need to inform communities about the importance of the environment.

(Ms I' van der Spuy; Representative; SOUTH AFRICAN TOURISM BOARD)

The average South African has nominal or no understanding of the nature of life support systems. You will have to shock people into awareness. My group has been involved in alien vegetation control for about 20 years and we have cleared, really cleared, about 100ha of dense hakea and *Acacia Cyclops* infestation on Elsie& Peak. The recovery of the fynbos has been spectacular but only a pitifully few of the local residents are really aware of the need to preserve our flora. I also have grave doubts as to whether or not Local Councils and Municipalities have any greater degree of awareness.

(Mr TF Ifeaiye; Representative; FISH HOEK ALIEN VEGETATION CONTROL GROUP)

Not enough emphasis has been placed on the creation of a proper management information system. The use of a Database, with a set of baseline data, constantly being updated will allow managers to measure performance/progress. The data base must include data relating to vegetation, soil, fires, footpaths, boundaries, financial, etc.

(Messrs J Levy and L Coelen; REPRESENTATIVES; MOUNTAIN CLUB OF SOUTH AFRICA)

Suggest sub-headings of recommendations, e.g. Geophysical, Water, Fire, Floral, Faunal etc.

(Mr P Gray)

May be difficult to implement?

(Mr J Stegmann; Trust Chairman; WPPPA TABLE MOUNTAIN BIKEPATH TRUST)

WATER: Rawson and Jackson reservoirs in Klawer Valley not mentioned in report. Form part of Simon's Town Catchment area. Alien vegetation should be cleared.

AIR: Helicopter landing rights in sensitive areas should be prohibited.

GEOPHYSICAL: Only official motorised vehicles (when necessary) should be allowed in natural areas. Users of mountain bikes, horses, other erosion-causing practices should pay for upkeep.

N.B. We support recommendations regarding small scale fishing enterprises.

(P Salter; Representative; SIMON'S DOWN FLORA CONSERVATION GROUP)

Page 36:

Fire management deserves a bit more attention - it's (as is pointed out) a tricky problem and a source of tension between human and ecosystem needs.

Invasiveness in other parts of the world *need* not imply invasiveness in the C.P.

I would however question alien invasive management being made the 'principal focus' for the next 10 years. Human abuse of natural systems if not properly managed could cause more devastation.

Page 37 - 2nd last point:

Promotion of codes of conduct should be extended to many more active education/information centres designed to captivate local and overseas tourists. Kloof Nek/Cableway a case in point - visitors should spend their 6 hours of queuing in user-friendly and educational activity rather than littering the environs and resenting the mountain for their discomfort.

(Dr C7W Davis)

There is no marine policy.
(Mr E Manus)

1. Under 'forest plantations' page 37, consider control of logging. If they are to become a recreational opportunity as primary use we don't want them cut down? Qualify with 'alien' forests to avoid any confusion.
 2. Under 'alien plants eradication' page 36, draw attention to alien aquatic vegetation. Most people will read the text as refering to land plants.
- (Mr J Fawkes)*

All of the points are valid and important, but to my mind the control and if possible eradication of alien invasives (mainly plants) is central to many of the other recommendations being implemented and effective.
(Mr DJ McDonald)

Identify need for state policy changes such as the autonomy currently afforded Dept. of Forestry to plant forests without a conservation ethic.
(D Thomas)

1. Hope that 'systematic eradication' won't include stone pines and gum trees.
 2. Management of urban growth in relation to needs of conservation needs more attention. The building line is continually subject to pressure for rezonings and development. The legal ramifications of development control and management need particular attention.
- (Ms S trustwick)*

Management of urban growth needs more focus; development pressure on mountain, interface and higher has, and will continue to increase in future. The legal ramifications of development control and management need particular attention.
(Mr If Gold)

We support the recommendation re small scale fishing enterprises.

WATER: The Rawson and Jackson Reservoirs in the Klawer Valley are not mentioned in the Report. They are important catchments for Simons Town. Simon's Town dams catchment area need greater protection. Alien infestation reduces run-off and therefore substantially cuts down available water. Costs of alien clearing and follow-up in catchment areas should be included in water costs. The river estuary through the Admiral's garden in Simons Town has been disregarded. We agree with the recommendation that inland water needs greater protection and with the need for establishing green corridors.

AIR: Heavy air pollution on still days is already too high urgent measures should be taken to reduce it significantly. Air space also needs protection; measures need to be introduced whereby aircraft are obliged to obtain permission to fly over sensitive areas, eg. the Reserve, and then only under certain stipulated conditions. Helicopter landing rights should be prohibited in the natural environment and should be strictly controlled in the urban fringe. Fines should be imposed on unauthorized low-flying aircraft.

FIRE: Overly frequent fires (a serious threat to biodiversity) can be curtailed by better fire-fighting practices, for example by changing the policy of fighting fires only once buildings are threatened to a policy whereby fires are also fought when veld that was burnt less than 10 years previously is threatened. The Report does a fine job on fire-management policy issues. We would like to see more emphasis on fire fighting communication and co-ordination.

GEOPHYSICAL: Motorised vehicles in the natural environment should be prohibited. If horse-riding, mountain bikes and other erosion inducing practices are allowed, these categories of users should pay for the upkeep of the paths. These activities should of course be prohibited in Primary Natural Areas. Heavy penalties of regulations designed to prevent erosion. It should also be specifically recommended that the IEM procedure is mandatory for any proposal relating to Utility Sites.

EDUCATION: In addition to the code of conduct and the programme designed to promote it, priority should be given to educational/interpretive centres which aim to install a love of the natural environment with special reference to fynbos. It is also essential that the environmental education programme be introduced at as early a stage as possible in schools. There should be close liaison between the conservation authority and the Western Cape education authority on the content and implementation of these programmes.

(THE CHAIRPERSON OF RLCG; REDHILL LANDOWNERS CONSERVATION GROUP)

Spelling of 'principle SHOULD BE 'PRINCIPAL'

(Ms GPI Russell)

1. It is alarming that so little attention has been paid in this section to the issue of managing and directing urban growth and development.
2. If the recommendation beginning Any changes to land is to be effectively implemented it will have to be supported by a well thought out and relatively sophisticated strategy. The processes of urban growth and development are generally extremely complex. They reflect a range of political, economic, institutional, legal and cultural factors. Directing and managing these processes is likely to be one of the single-most important and challenging tasks facing the CPHA. At the very least careful attention has to be paid to the existing legal and institutional determinants of growth, especially in so far as they are founded in rights and interests that are protected by law, including zoning schemes protected by the Land Use Planning Ordinance, 15 of 1985.
3. p41 (Guide urban and infrastructural development). It should however be pointed out that this area warrants considerably more detailed thought than it is given even in section 4.3.3. In addition it should be noted that the reasons for managing growth are considerably more extensive than simply aesthetics.
4. p35: (Protect the geophysical environment) A number of broad statements are made in this paragraph. They have potentially far reaching consequences which need to be investigated more fully. For instance, the meaning of 'undesirable construction activities' must be established. Does it mean particularly detrimental developments or is it simply 'changes to land ...' (sic) as referred to later in the paragraph. The requirement that any such 'changes' require an EIA, and need desirability analysis and 'environmental management plans or contracts' appears to be excessive, especially when seen in light of existing statutory controls. The city's

planning and land management resources will be stretched well beyond their capacity in the implementation of Reconstruction and Development projects over the next few years. It will be unreasonable to require so rigorous an approval process for all 'changes to land' that fall within the proposed CPHA.

5. **p36 (Protect all inland waters) Advocates the maintenance of river corridors and water catchment areas from crest to coast. The main report does not explain why for example Zandvlei wetland system which arises largely in the Peninsula Mountains is not included in the proposed heritage area.**
6. **p36 (Reduce the risk) Revise to read - Reduce the fire risk to people, the natural environment and property**
7. **p36 (Following commissioned research) The final sentence ends "... should be the principal focus of management for the next 10 years". This is an impossible task. If aliens become the principal focus nothing else will get done in the Peninsula. This has to be seen against other priorities and the need for considerable additional funding. What is required is a set of priorities of what is obtainable and can be sustained without increasing the management load exponentially. This recommendation does not take cognisance of the fact that most of the dense unmanageable alien infestations are on private land.**
8. **The top paragraph on page 36 which discusses water and water catchments should include 'inappropriate urban development' in the second sentence which lists activities which affect the water quality and volume of water. Although the first statement 'all inland and coastal waters' does include aquifers/groundwater, perhaps these should be specifically mentioned. A final comment: the paragraph ends by saying 'Initiate rehabilitation ...' this is a blanket statement, perhaps some prioritisation of rivers most suited to being rehabilitated should be conducted.**
9. **p37 (Maintain agricultural production). The point is a good one but it is important to understand the economic pressures on existing farmers. 'Capping' agricultural expansion could have a range of unanticipated consequences, particularly on land values, and these could well have negative implications for environmental management. Vineyards may be part of the cultural landscape but if they 'creep' up the mountain then they cause negative visual impacts.**
10. **p37 (Draw up a code of conduct) How practical is this? This could be applied to natural areas, but what about residential areas? Education, leading to a pride in the heritage, would be more appropriate. The definition of Cape Peninsula obviously becomes important here. As it currently stands this paragraph is meaningless or, at least, absurd.**
11. **p37 (Investigate the feasibility) The report should lay greater emphasis on the advantages of World Heritage Status. The relevant Appendix merely lists the conditions but does not motivate the far reaching advantages that this status would give the area.**
12. **p37 (Utilise existing forest) The statement 'do not allow expansion and replanting of existing alien plantations' is contradictory. These are commercial plantations. If they are clearfelled then they must be replanted. This recommendation should be reviewed to read: 'The existing alien forest plantations should be reviewed to**

determine their environmental and visual impact and the recreational role. Limits should then be set for areas of commercial plantations which will **be subject** to normal forestry operations, existing plantations that should be removed for conservation and visual reasons and those that should be managed for recreation.'
NB: Both of the above point to the need for a Visual Resource Management Plan.

13. p37 (Protect the Marine) Revised to read ... Co-operate with the existing agencies to co-ordinate the protection of the coastal and marine environments ie The new authority will not take over existing functions.
14. CSIR Forestek GIS System. On page 20 of the main report (Vol 1) fleeting mention is made to a computer based system for the Cape Peninsula. The system known as the Catchment Management System (CMS) is in fact an extremely powerful management tool and will become essential to the future scientific management of the Peninsula Mountain Chain. Of particular importance is the very comprehensive GIS data base for Table Mountain which is now being expanded to Constantiaberg/Silvannine and is currently being finalised for the Cape of Good Hope Nature Reserve. The GIS data base and the CMS deserve more than a fleeting mention. They will play a vital role in the future management of the Peninsula Mountains.

(FROM 'COMMENTS ON APPENDICES')

VOLUME 2: APPENDIX 14 PART A - PHYSICAL FEATURES AND WATER

Page 14.7

Wetlands are presently insignificant in attenuating floods on the mountain or elsewhere in the Peninsula. Their role is being overstated in the report. The dams, as well as the weired (sic) vleis, do of course have considerable attenuating effects. Agreed that basic planning has allowed encroachment into many river corridors, making canalisation the only engineering solution to flooding.

Page 14.8

The Water Act is already being used to control point source pollution in Cape Town. Discharges of polluted effluent and wastewater are already prohibited. The problem is the diffuse pollution mainly off streets and gardens for which no practical solution has been proposed in this Utopian policy.

Staffing and funding restrictions are also a major problem in controlling numerous low level incidents of pollution, e.g. by fanners, gardeners and buildings.

Page 14.9 #4: It is not considered practically possible or economical to reduce all flood peaks and significantly limit transfer of silt and debris from section to adjacent section. This is only economical in special cases (e.g. Zandvlei or Devil's Peak).

#5: Re-establishing natural watercourses would require MUCH more land, unless each house was required to spend several THOUSAND rand on attenuation tanks, etc. How does alien vegetation increase catchment runoff?

#8: Inventories and monitoring will require staff and funds not presently available.

#9: Inventories and monitoring will require staff and funds not presently available.

Page 14.10: Air Pollution Prevention Act 45 of 1965 should read Atmospheric Pollution Prevention Act No 45 of 1965. This should follow through the text.
Guidelines

(1) Establishment of new scheduled industries. Valid

Comment: It is noted that isolated industrial areas are covered by the plan and a scheduled industry is registered in the Hout Bay area. Although scheduled industries are generally accepted to be large scale industries and major polluters, it must be borne in mind that they can also be very small eg. lead recovery from batteries.

(2) Partly Valid

Change to:

The smoke and dust control provisions of the Atmospheric Pollution Prevention Act should be made applicable to all the areas of jurisdiction of local authorities within the Cape Peninsula Heritage Area. (The Cape Peninsula Heritage Authority should facilitate the joint application from all local authorities within the Cape Peninsula to the Minister of Health).

Comment: The local authority areas of Cape Town, Western Cape Regional Services Council, Fish Hoek and Simon's Town are declared smoke control areas and will cover the area in question.

Dust Control areas have been declared by the Cape Town City Council and Western Cape Regional Services Council. This would partly cover the area in question.

(3) Invalid

Change to: The Cape Peninsula Heritage Area Authority should liaise with the local authorities within the boundaries of the Peninsula to rigorously enforce the provisions of the Atmospheric Pollution Prevention Act.

Comment: The authority to enforce the Act will rest with the local authorities.

(4) There is a need to control activities in the Air Space.
Helicopters, microlights, etc. frequently violate civil air regulations on low flying. This disrupts the 'wilderness' experience of users. There will also be a need to control commercial 'flips' of helicopters wishing to land in the mountains.

The future use of fixed wing aircraft for fire control should not be rejected out of hand. There may be a future need for landing strips for fixed wing fire bombers with the relevant infrastructure within 10 minutes of flying time of the Mountains.

(5) p 14.11

There is a serious overlap and contradiction with Fire Brigade Services Act (99 of 1987) and the Provisions of the Forest Act for Fire Control Committees. This needs to be investigated urgently.

(6) p 14.13 para 3

The CMS system developed by Forestek is an outstanding tool for achieving this, it should be implemented as soon as possible.

(7) p 14.13 para 5

Private landowners should be represented on the Fire Control Committee.

An additional responsibility should be the conduction of vigorous public education programmes as outlined in para 17 (p 14.15)

(8) p 14.15 para 17

Politicians and other decision makers also require education! Their ignorance on controlled burning severely hampers these operations.

(9) The possibility of utilising fixed wing water bombers should be re-investigated. See reference elsewhere.

(10) Why is no real reference made to fire in the main document (Vol 1)?

VOLUME 2 : APPENDIX 14: PART B - BIOLOGICAL DIVERSITY

MARINE AND COASTAL ENVIRONMENTS

Extensions of CPPNE boundary to below LWM may be difficult from the point of view of marrying the proposed National legislation for the CPHAA with the many other existing Acts/Ordinances applicable to the coastal areas (Sea Shore, Transport, Environmental Conservation, Nature Conservation, etc.)

In principle, it would be desirable to exercise some control over pollution, erosion sources, land use, infrastructure and built form, but the CP Heritage Area Authority would not be the most appropriate body to do that, as it is unlikely to have the resources required to do so.

In principle, the protection of 'crest to coastline' scenic landscapes is desirable, but is not practical in many areas. Specific 'crest to coastline' landscapes which are relatively undeveloped/undisturbed should rather be identified where it would be feasible to implement control measures.

(CITY OF CAPE TOWN: CITY FLAIYIER)

The manner in which information on the Peninsula's natural resources, management actions, and important events (such as fires) is handled is fundamental to the success or failure of management of the area. As such I believe it needs to be written into policy. As you are aware (and as recorded in your Main Report, pages 18 and 20), we are currently developing GIS-based management system aimed at recording, storing, retrieving and analyzing environmental information for the purpose of supporting management decisions. While this development is recognised in your draft policy document, it is not discussed further.

It is simply not possible to make sound decisions on the management of the Peninsula in the absence of information. Some easily observable examples include the fact that, although an enormous amount of money and effort has gone into attempts to control alien invasive plants, no-one is in a position to assess whether these efforts have been effective, that despite many suggestions that the fire regime has been altered, no hard evidence exists whereby it would be possible to analyze trends; and although it is well known that many accessible map of their distribution, that would make it possible to identify threats to these species, exists. And so on. Clearly, there has to be some attempt to create and maintain a database of relevant information if the management of the Peninsula is to be placed on anything like a rationale basis. This is a fundamental point that I would like to see expressed clearly in the policy document. I would not like it to be seen as simply an 'independent initiative' as it is phrased in your draft report.

The possibility of proclaiming the Peninsula as a World Heritage Site has been mooted, and the advantages of such a step are obvious and substantial. The success of any attempt to get the Peninsula proclaimed as a World Heritage Site depends on a sound basis for its management as a first and essential step. This in turn, depends on the maintenance of a database to underpin management decisions. By addressing this fundamental need prominently in the policy document, the chances of success in getting the management of the area on a sound footing should improve substantially.

I will also make further inputs into the comments on the draft report throughout the Scientific Advisory Subcommittee of the UTNE MAC, of which I am a member. From the CSIR's perspective, I only wish to discuss the database issue with you in detail.

Another small point that we would like you to consider changing is the way you present our name. The CSIR formally changed it's name from 'Council for Scientific and Industrial Research' to 'CSIR', in other words the acronym is now our name. The 'Council for Scientific and Industrial Research' does not exist any more. The GIS system is being developed by the 'CSIR Division of Forest Science and Technology', our preferred name.

(Dr .13W van Wilgen; Representative; CSIR? FORESTRY SCIENCE AND TECHNOLOGY)

(NOT to be taken as a formal response from the MAC)

1. DATA MANAGEMENT

We refer here to the recommended policy on page 14.56 of Volume 2, which deal with the establishment of a database under the heading 'Research'. We have listed a number of suggestions for the improvement of this section.

- 1.1 We agree with the general guidelines, particularly points 3 and 4, but feel that these should be placed under a separate heading of data management, equal in rank to other issues dealt with, and not hidden under 'research'. The reason for this is that data management is fundamental to the sound management of the area, and is not only a research issue. It is simply not possible to make sound decisions on the management of the Peninsula in the absence of information. Some easily observable examples include the fact that, although an enormous amount of money and effort has gone into attempts to control alien invasive plants, no-one is in a position to assess whether these efforts have been**

effective. Despite many suggestions that the fire regime has been altered, no hard evidence exists whereby it would be possible to analyse trends. Although it is well known that many endemic and rare plant and animal species occur on the Peninsula, no easily accessible map of their distribution, that would make it possible to identify threats to these species, exists. And so on. Clearly, there has to be some attempt to create and maintain a database of relevant information if the management of the Peninsula is to be placed on anything like a rational basis. This is a fundamental point that needs to be expressed clearly in the policy document.

1.2 On page 30 of Volume 1, the conclusion is made that 'the existing information base for the Cape Peninsula is inadequate at present for the formulation of a detailed and comprehensive management plan'. However, this point is not carried forward to the main recommendations, also listed on page 30. It is our opinion that the establishment of a centrally co-ordinated, standardised database and an information management system based on this is central to a vision for the systematic, scientific management of the CPPNE. As such it needs to be stated up front, with the main conclusions and recommendations of the study.

1.3 In all of the sections that deal with details of the geophysical and biological environment, fire, vegetation, alien plants, afforestation, biodiversity, fauna, agriculture, management and land ownership, prominent cross-reference need to be made to the section dealing with the database, giving the minimum data needs. For example, for fires it would be necessary to record the boundaries and date of the fire as a minimum requirement.

2. FIRE MANAGEMENT

We refer here to the policy described on pages 14.12 and 14.13 of Volume 2. We have listed a number of suggestions for the improvement of this section.

2.1 The policy statement on page 14.12 calls for a reduction in 'the fire risk to people and property. This should be expanded to include the risk of inappropriate fires to the ecosystems of the Peninsula (such as fires at very frequent intervals, or fires in dense stands of alien plants).

2.2 There is a very important need to develop a sound policy with regard to the management of the urban fringe, and to cover development in fire-prone areas. For example, certain types of buildings, houses and structures are simply inappropriate in, or juxtaposed with, fire-prone ecosystems. One thinks here of wooden buildings, thatched roofs, dense vegetation around buildings and so on. Policy should either ensure that developments of these kinds are not allowed, or clearly place the risk with the developer. Such developments should not be brought about at the expense of sound ecological fire management policies. It is similar to the principle that houses are not built on flood plains. Certain areas should be zoned as 'fire risk areas', and developments in these areas should be governed by legislation or clearly be undertaken at the risk of the developer.

2.3 There is legislation that will inhibit the sound fire management of the Peninsula's ecosystems. Examples include the restrictions regarding air pollution, and the need for permits to burn within zones declared as 'no fire' zones in terms of

Forest Act at certain times of the year. While these can be overcome, a clear policy directive is necessary for the reference of the authorities in this regard.

2.4 There is a conflict between the provisions of the Forest Act (122 of 1984) and the Fire Brigade Services Act (99 of 1987) with regard to the 'protection of negligence' clause mentioned under point 5 on page 14.15. This arises when areas are proclaimed as fire protection areas under both acts (as is the case in some areas on the Peninsula), and will inhibit the sound ecological fire management of the areas. This needs to be clarified in the policy document.

2.5 While we agree that the powers of the existing Cape Peninsula fire Control Committee could be transferred (point 5 on page 14.15), it should be pointed out that this committee is to all intents and purposes defunct, and the needs exists to resurrect it before it's powers can be transferred anywhere.

3. ALIEN PLANTS

We refer here to section 1.1.2 in Appendix 14, Part B: Biological Diversity (starting on Page 14.19).

3.1 The meaning of the first sentence of the policy statement ('Following commissioned research...') is unclear. It may be construed as meaning that further basic research on alien plant is required, which was not what was meant. It is suggested that this sentence be replaced by 'Following the urgent collation of existing knowledge, a systematic plan for alien plant control should be formulated'.

3.2 The word ERADICATION should be replaced throughout the report by the word CONTROL - the 'eradication' of alien plants is an unrealistic aim and creates unreasonable expectations:

3.3 The policy statement should emphasize that the systematic control plan should cover the whole CPPNE (ie. that there should NOT be separate prioritization for areas under the control of different authorities).

3.4 The last sentence of the policy statement on pl 14.21 reads '...alien invasive plant eradication (sic) should be ONE of the principal foci of management over the next 10 years'. In section 4.2 of the summary document this sentence was modified to read that alien plant control should be THE principal focus of management. The committee recommends that the former CONE of the principal foci' be retained and used throughout the report.

3.5 The policy statement should include the aim of removing known invaders from gardens within the CPPNE.

4. AFFORESTATION AND AGRICULTURE

4.1 Section 4.2.3 (6th pointer, page 37, Vol. 1) and Appendix 14, Part B, 1.1., Afforestation pp 4.25027 (Vol. 3). All existing forest plantations should be assessed as to environmental impact, including financial viability, visual impact and intrusion into core (remote and quiet) areas.

Question: If SAPCOL withdraws from limber production in the CPPNE, which public body will manage these plantations, and what policy must be followed?

4.2 We suggest that the word 'replanting' (2nd line of the Policy) be removed.

4.3 Section 4.2.4.: (7th pointer, page 37 Vol 1) and Appendix 14, Part B, 1.1.4 Agriculture and Grazing 1427-1428 (Vol 3):

4.3.1 Nothing is said about change hi crops/ methods - which could affect visual attributes.

4.3.2 Wild flower harvesting should be assessed but as it is currently seen to be non-sustainable, should now be prohibited on public land and discouraged on private land.

4.3.3 Wild flower farming is seen to be potentially dangerous unless strict controls over genetic material can be exercised by the authority.

4.3.4 No infrastructural developments such as clearing of land, roads etc. should be allowed until an overall development plan is approved by authority.

(Dr DM Richardson; Acting Chairman NOT FORMAL MAC RESPONSE; CPPNE MAC SCIENTIFIC SUB-COMMITTEE)

Page 35 - In the first recommendation to reduce visual intrusion should be included i.e. ... to restore eroded or disturbed areas to ensure that they do not represent a hazard to people and property and to reduce visual intrusion.

(Mr C Sullivan; Chief Executive Officer; WCRSC)

Biodiversity is important but socio-economic conditions shouldn't be seen as a threat to it.

(ENVIRONMENTALIST SOCIETY (ENSOC))

Excellent! - especially the stress on urgency of eradication of alien invasives (bottom p.36).

(If Taylor)

Principal recommendation should be: 'To enhance the area's rich Biological Diversity'. Birds should be encouraged and re-introduced to Cape Point and other places, and trees and berry bushes cultivated and planted at scenic spots. At Cape Point week-end huts should be built for the public

(Ms S Louw)

More effective fire management need be applied. Also focus on faunal management. Classic example - we need better signage/law enforcement as regards feeding of baboons. This is a battle I have been fighting for the last 2 years without any joy. We need to have a comprehensive management plan for the baboons.

(HOMMETJIE ENVIRONMENTAL AWARENESS GROUP)

Please emphasise the WHOLE Cape Peninsula not only the CPPNE.

(Mr D Stechman)

2nd finger: significance needs to be introduced e.g. the proposed impoundment at Maylands above Simon's Town will reduce water quantity - is it significant?

5th finger: 'Following commissioned research' - not absolutely necessary, rather have 'Using available information and, where necessary, relevant research,..'

°Something could be said about stormwater management systems

Cross-references between report and Appendices could help (check appendix Numbers and page numbers)

(Mr JE Avis)

p. 57 include 'developers' - they must have a code of conduct in all areas of the CPHA. There are enough existing development rights to literally destroy a large section of the remaining diversity. Use incentives and penalties for all developments from now on - not in 2 years time. Sound pollution controls required now. Air pollution - protect air quality on which all CPHA life depends. eg UCT Brown Haze Project - exhaust emission control *etc.*

(Dr J Gardner; Chairman; CAPE WETLANDS TRUST)

(i) Again more specific mention should be made of the deleterious effects of littering, and steps to combat it.

(ii) Bottom of p36: Eradication of invasive plants certainly ought to be a principle objective, but surely not the principle focus? Equally important (if not more so), in our view, would be the prevention of IRRETRIEVABLE changes due to urban encroachment, scattered development (touristic or otherwise) and squatting.

(Mr If van Huyssteen; Representative; UNIVERSITY OF STELLENBOSCH - GEOGRAPHY DEPARTMENT)

Some changes that have already been made may need to be reversed. Particularly water management and solid waste management. The question of 'light pollution' - the move to reclaim the night sky is one of growing concern in Europe. It doesn't quite fit in this section but it should go somewhere as a consideration in the amount and type of lighting allowed.

(Ms D Salters)

CONCLUSION CONCERNING CULTURAL & SCENIC DIVERSITY

p. 38 final paragraph - should get more prominence.

p. 40 recreation - many paths on the mountain are badly eroded.

p. 40 public transport - very important need.

(Mr La McEwan; Chairman; LAKESIDE/MUIZENBERG RATEPAYERS ASSOCIATION)

To 'optimise' beauty is on the fringe of rape.

Development often leads to the reduction of 'visual quality'.

(Dr D Sleight)

Man's intrusion has not been only negative but in many cases has added qualities to the area that help to attract and create scenic diversity.

(Mr CB Mitchell)

The national and international importance of this natural feature and landmark in the landscape should also be mentioned.

(Mr ND Geldenhuys; Executive Director: Southern Parks; NATIONAL PARKS BOARD)

Rather use the words 'impairing' or 'worsening' the areas visual quality, rather than 'reducing'.

(Mr J Hale; Representative; SWARTKLIP ALIEN VEGETATION ERADICATORS)

I thought this section was absolutely excellent! Well done!

(Dr IAW MacDonald; Representative; SOUTHERN AFRICAN NATURE FOUNDATION)

I think that despite certain inappropriate developments, the Cape Peninsula has escaped largely unspoilt, and that most of its beauty is being optimised. We do not want to turn it into a Disneyland.

(Ms S Ilowes)

Examples of visual quality should be given.

(Mr JAI Fudge)

We believe that the words 'use' should be 'POTENTIAL' and 'optimal' should be 'REALISED'

(Messrs J Levy and L Coelen; REPRESENTATIVES; MOUNTAIN CLUB OF SOUTH AFRICA)

Add the following to the conclusion:

.... and destroys important cultural assets*.

(Messrs Lutsch, Coetzee, Cowan)

Examples of inappropriate developments should be mentioned as well as appropriate developments for comparison.

(Mr L de Waal)

Very little awareness of the cultural history of the Cape Peninsula among the general public. Many sites of cultural significance being overgrown, particularly by aliens.

(P Salter; Representative; SIMON'S TOWN FLORA CONSERVATION GROUP)

Use of 'optimised' - implies exploitation - reservations about the wording of the first half of the statement.

(Mr E Manus)

Visual 'impact assessment' as a method of evaluating the worth of landscapes has not enjoyed prominence in RSA. This should be integrated into any research effort which seeks to put value to the cultural and scenic diversity of the Cape Peninsula.

See: The Visual Landscape of the Indian Peaks Area, Colorado front range, USA.

IL Baumgartner 1983. Mountain Research and Development 3(1) 13-25.

(Mr DJ McDonald)

Cultural assets are not necessarily only Historic.

(D Thomas)

Inappropriate development is reducing the area's historical and visual quality and is reducing the special sense of place (on a small scale).

(Ms S ffustwick)

Lack of care and commitment in regard to protection and conservation as well as outright degradation and abuse by untutored users is continuously damaging and even destroying many of our scenic assets.

(TIM CHAIRPERSON OF RLCO;; REDITILL LANDOWNERS CONSERVATION GROUP)

1. Report seems to imply that cultural significance only applies to certain sites, notwithstanding the motivating statements.

2. The magnificent scenery of the Cape Peninsula is the most marketable asset that the Western Cape has. If tourism is to be the main source of foreign exchange that it is predicted to be, then it is absolutely essential that the preservation of the scenic diversity of the Cape Peninsula be one of the prime objectives. It is an asset that can be quantified in financial terms.

3. Why is the policy in Appendix 14 (p14.39) different to the one in the main report?

4. The statement '... guide urban and infrastructural development' is too unspecific - easy to say, but how would it be implemented?

(CITY OF CAPE TOWN: CITY PLANNER)

MOTIVATION CONCERNING CULTURAL & SCENIC DIVERSITY

Page 40, paragraph 1, line 1. '...sites is more problematic.'

Add 'It is necessary here to emphasize the importance of sites and monuments other than those related to 'white elitist memorials to apartheid' and sites which could promote the concept of a healthy, multi-cultural nation-building society in South Africa and to those visiting the country.'

(Ms G Abrahams)

Some specific problems need to be suggested.

(Prof JR Grindley)

I don't think the few masts that have been erected 'severely undermine the visual integrity of the Cape Peninsula'.

(Mr P Dennehy)

Recreation, and relaxation, should always be seen in conjunction with education. Environmental Education should be a major function of the body entrusted with management.

(Mr Z Erasmus)

Address visitor facilities more urgently - could destroy before master -plan in place.

(Mr N Malherbe)

More specific data on tourist numbers and the benefit that they and their spending power brings to the region.

(Mr CB Mitchell)

Must address visitor facilities with a view to supplying the demands of tourists.

(Mr C Adams)

Page 39: Re-write last sentence 'For these reasons...' the majority of residents are likely to ask 'what jobs? what wealth?' Suggest 'x number of jobs will be created for every 1000 extra tourists'. Trickle -down effect.

(Mr R Hunt)

Need greater recognition of the way that the landscape is shaped and re-shaped, used and neglected, seen and remembered.

(Mr S Townsend; member; CAPE INSTITUTE OF ARCHITECTS)

The last point on improved public transport should be expanded upon. In my view, the Internal combustion engine' is responsible for the greatest onslaught on the cultural and scenic diversity, in the form of pollution, (many farms), roads and parking.

(Mr B Kopfer)

Except - as mentioned before, why have the areas that contain cultural treasures not been included in the area demarcated in Fig 2.

(Ms S Howes)

More specific information should be given.

(Mr JM Fudge)

COMMENTS: More information should be available on the fauna, flora and geographical importance of the area.

(Ms P van der Spuy; Representative; SOUTH AFRICAN TOURISM BOARD)

A sense of urgency must somehow be injected into the minds of the councillors and municipalities. The grading system of towns must be revised because the present system produces a bias in favour of developers, because more houses et. al. means higher municipal involvements. There are a few Qalahads among the Town Clerks.

(Mr TP KEANE; Representative; FISH HOEK ALIEN VEGETATION CONTROL GROUP)

Include for buying back property development/use rights already conferred.

(Mr J Stegmann; past Chairman; WITPA TABLE MOUNTAIN BIKEPATRIOT TRUST)

A note should be added in which sites 'currently acknowledged as being of cultural significance' do not have their protection reduced 'as South Africa's perception of its past changes'.

(Mr W van Warmelo)

Cultural assets are not necessarily only historic.

(D Thomas)

The paragraph 'Other structures and remains...' focuses on individual elements only - what of patterns of development and unique streetscapes and buildings, grids etc, in which the 'schools, mosques, churches, cemeteries' are located - i.e. context is also important. Section 4.3.2:

- The quality of historic urban areas is being eroded through inappropriate or insensitive development and redevelopment.

The urban-rural fringe is not fixed and requires metro-wide agreement on freezing it in certain strategic points. The type of devt. that occurs on the urban-rural fringe is often inappropriate.

Historic/symbolic/aesthetic vistas and relationships are obliterated or denuded by insensitive devt.

Vistas from scenic routes are denuded through insensitive devt. There should be a visual resource management plan which will encompass all recommendations and lay down stringent guidelines for the preservation of this asset.

Scenic drives regulations should apply to the whole peninsula. Key vistas require protection.

(Ms 5 ffustwick)

1. Need greater awareness of process of history, of settlement, of human activity over the centuries (and into the future)
2. What is meant by cultural has not been adequately defined. There is a need to research public opinion on, for instance the stone pines on Table Mountain. The maintenance of these 'artificial' landscapes is extremely expensive - can this high cost be warranted? Another example is the vineyards in the Constantia Valley. These may be cultural in the valley, but when they go right up the mountainside they become visually intrusive. Where there is a clash between cultural and scenic, then scenic values should take preference.

(CITY Of CAPE TOWN. • CITY FLAIYIYER)

We need Robben Island as a tourist place of interest.

(Ms 5 Lougv)

Somewhat vague and general.

Marincowitz)

RECOMMENDATIONS CONCERNING CULTURAL & SCENIC DIVERSITY

It is pleasing to see that scenic, cultural and aesthetic values have been given a prominent place in the report. It is not currently fashionable to include values, dreams or emotions in planning reports even though it is due to such 'subjective' and 'non-scientific' matters such as our collective emotional values that the Peninsula Mountains (including Table Mountain) have not already been built all over, and for no other reason. It is suggested that the emotional and aesthetic factors could be given even more prominence in the report. Other environmental factors such as water relations, erosion, species preservation, fire etc. are usually controllable (given the necessary inputs) and should be regarded as subsidiary to and supportive of the subjective factors and not visa versa. The writers of the report are to be commended for not relying solely on environmental arguments to support hidden subjective *values*.

(Mr FM Adams)

Page 41, paragraph 1, line 1.

Add 'Make provision for costs to ... identify, maintain' etc. This is necessary especially since it is acknowledged that presently unappreciated sites will require protection.
(Ms O Abrahams)

GENERAL COMMENT: Our plantation assets are currently being used extremely for unstructured recreation. We intend to change this towards a more focussed nature, tourism and educational experience and would thus participate in any related action plan.
(Mr P le Roux; Environmental Manager; SOUTH AFRICAN FORESTRY COMPAIYY (Ltd))

I have read your 'Draft Policy for Cape Peninsula' and I think this is wonderful project and I do agree with all your suggestions re this Policy. I would like to suggest that you get children involved in this project as soon as possible. You should get sponsors like Eskom & the different Motor Manufacturers to sponsor trips for the children to these places like Sancob, the Paarden Eiland wetlands, the Rietvlei Reserve, etc. The firms can use this as advertisements by issuing caps or whatever to the children what the 'natural environment' is, and how we must preserve it. But don't leave it for the people in 'high places' to decide when it is to be done. By then a whole lot of damage will have been done to our environment. Children must grow up with the feel for nature, and that they can only get by going to nature and learning what preservation entails. Best of luck with your 'Policy'
(Mrs PIJ du Rand)

p. 41 final paragraph - very important; more prominence.
(Mr LO McEwan; Chairman; LAKESIDE/MUIZENBERG RATEPAYERS ASSOCIATIOIY)

Recognise enormity of visitor influx effect as a matter of urgency.
(Mr N Pralherbe)

Too broad - more like a goal than a recommendation.
(Mr B Oberholzer)

The economics of the issue needs to be carefully investigated and taken into account.
(Mr CB Mitchell)

Recognise the enormity of visitor-influx effect as a matter of urgency, including that of squatters.
(Mr C Adams)

Provision should be made for nature conservation staff to be trained/educated/developed under the auspices of the new authority.
(Ms M Thesen; Chairman; FRIENDS OF THE CAPE OF GOOD HOPE NATURE RESERVE)

Emphasis on tourism should not 'lead' development as it appears to be doing at present in the Cape Town City Council area. Tourism is only one of the aspects of development and should not predominate to the detriment of permanent residents.
(Mrs B Walker; Representative; WARD 4 RATEPAYERS' ASSOCIATION)

As a longer term goal, I would like to see a recommendation for the construction of a public transport system, starting from the south (Nature Reserve) and gradually moving northwards, which would make the use of private motor vehicles unnecessary.

(Mr B Hopfer)

Again: the role EDUCATION can play in this has been overlooked.

(Ms S Ilowes)

Examples of past problems should be given.

(Mr IN Fudge)

COMMENTS:p41 paragraph 4

Recreational and tourism activities and developments should not only be regulated by a system of functional areas but should also be developed within a tourism management plan for the area. The tourism management plan should form part of a management plan for the Peninsula Heritage area.

(Ms P van der Spuy; Representative; SOWff AFRICAN TOURISM BOARD)

The term 'social benefits' needs clarification e.g. the American consumerist lifestyle is incompatible with the principle of sustainability. A good quality of life does not require over- consumption of energy and resources.

(Mr L Liebenberg)

Who are the 'certain users' who are going to pay? Is this not somewhat elitist?

(Mr R Saunders; Co-convenor, Conservation sub-committee; MOUNTAIN CLUB OF SOUTH AFRICA)

The words 'PROTECTED NATURAL ENVIRONMENT (or alternative name) should be added after 'CAPE PENINSULA'.

(Mr EI van der fforst)

Local communities must share directly in the benefits of tourism and the proposed Cape Peninsula Heritage Area. These benefits must trickle down as far as possible - even to the poorer communities on the Cape Flats.

Although the Integrated Conservation Development Projects (ICDP) concept is mainly applicable to rural areas, it can also be applied to the CPHA and even on a wider scale. Therefore the integration of conservation and community development projects that will benefit as many communities within the Greater Cape Town area as possible must be seen as a priority.

The report correctly states that practically no area is devoid of cultural significance. It is therefore necessary, that the overall management of objectives for each of the four functional areas include a statement providing for the protection of cultural resources in each of the four areas.

(Messrs Lutsch, Coetzee, Cowan)

The WPPFA bikepath proposal is seen by us as being consistent with these principles.

(Mr J Stegmann; Trust Chairman; WPPPA TABLE MOUNTAIN BIKEPATI1 TRUST)

N.B. Protect not only visual but also cultural sites, when development takes place.

(P Salter; Representative; SIMOIY'S TOWN FLORA CONSERVATION GROUP)

RATHER:

Use of the Cape Peninsula should be managed so as to enhance the area's cultural and scenic diversity and minimise the loss of societal benefits'
(Mr E Manus)

'Identify, maintain, MANAGE, and if necessary restore sites, AREAS, and landscapes (both urban and rural). There is a tendency for authorities to allow themselves to be bulldozed by developers' proposals to the detriment of our natural areas. So much in the name of progress destroys our heritage. Take a firm line regarding the preservation of our 'wilderness' OR 'natural' areas.

(Ms S ffustwick)

- 1. Urgently need visual resource controls/strategy.**
- 2. Societal benefits must not be maximised at the expense of hardcore scientific preservation of the natural environment.**

(Mr ff Gold)

Archaeological sites needs to feature more prominently when promoting cultural heritage qualities.

(THE CHAIRPERSON OF RLCG; REDITILL LANDOWNERS CONSERVATION GROUP)

Page 41: 'free access' to, e.g. sites of religious significance. This must NOT be to the disadvantage of the biodiversity of that area, or leading to physical degradation of the area. Re: the urban fringe: The guidelines to visual quality are so weak; there is no power to stop developers continuing to do whatever they like re building style as long as they conform to the current zoning. There should be controls on visitor behaviour in all four areas of use.

(Ms GM Russell)

- 1. p41 (Identify, maintain ...)
This should be reworded - Identify and after investigation, if deemed necessary, maintain and restore ...**
- 2. The last sentence of this paragraph refers to religious sites. This is difficult to apply where Rastafarians are concerned - everything is religious to them. There is a need for control - the controversy around the peace poles is a good example. This sentence should read - 'Ensure free access for worshippers to existing sites of recognised religious significance.**
- 3. Not only 'sites and landscapes' should be mentioned. Whole conservation areas (Special areas) exist and should also be mentioned.**
- 4. p.41 (Guide....) Change the last sentence to read 'Produce guidelines for managers and developers describing measures to be taken to reduce the visual impacts of desirable change and routine management activities'.**
- 5. GENERAL There should be a Visual Resource Management Plan which will encompass all recommendations and lay down stringent guidelines for the preservation of this vital marketable asset.**
- 6. Add a recommendation that the Cape Town City Council's Scenic Drives Regulations be extended to the whole Peninsula.**

(FROM 'COMMENTS ON APPENDICES')

VOLUME 2 : APPENDIX 14 : PART C CULTURAL AND SCENIC FEATURES

1. AESTHETICS

It is important to emphasise that the visual uniqueness of an area can be very rapidly destroyed, within a generation. Parts of the Spanish and Californian coasts are examples of such destruction.

**3 Recreation and Tourism
Page 14.43, para 4**

Would strongly support the opinion expressed in para 4 °In order to protect the Cape Peninsula 'ie in respect of multiple use and specically designated functional areas. Would however prefer to see the word "sustain° replace the word 'protect'.

Page 14.43, para 5

The tourism figures quoted for 1993 appear to be virtually identical to our estimation of visitor numbers for 1992. If they have used City Planners Department (CP) figures both the year must be corrected as well as the area receiving these visitors. CP estimation was for the Central Statistical Services defined area of the Cape Peninsula - which consists of the area from Cape Point to Mills River. The figures quoted for the Cape Metropolitan Area either for 1992 or 1993 would be slightly higher than those that are provided.

Page 14.44, para 4 previous page continued

Similarly CP estimation of direct tourism spend in the Cape Peninsula (see above) was R1.6 billion for 1992. Estimations of regional tourism stats for 1993 have not been seen to date.

Page 14.44, para 2, line 8

Would strongly support the opinion in the sentence 'It is thus important to improve the management systems and facilities to promote tourism in the Cape Peninsula, whilst ensuring that the environmental features of the area are not undermined'

Page 14.44, para 3

Would support the sentiments expressed under the heading 'Policy

Page 14.45, Guideline 2

A programme of education and possibly promotion through schools should go hand in hand with publicising and enforcing the revised code of conduct.

Page 14.51, Guideline 5

If the entire area is to be managed in a holistic manner, consideration should be given to the major entrances described ie Kloofnek, Silvermine Nature Reserve, Constantia Nek, Newlands Forest should conform to some common architectural elements.

Page 14.51, Guideline 7

'Provide convenient and fair access to the Cape Peninsula public facilities and resources for all residents and visitors, subject only to their subscribing to a code of conduct of responsible use.'

It is not possible to agree with the above ie ... only subscribing to There may come a time in the foreseeable future when it may be necessary to levy a user fee for the use of these facilities.

Page 14.52, Guideline 9

Would not restrict the investigation of a levy / payment to equipment based recreational activities but would expand its brief to include all users of the area.

Page 14.52, Guideline 10

There is a problem with the definition of the Cape Peninsula as used throughout the document (see below). In Fig 2 pp 15 Vol 1 Main Report, the Cape Peninsula is defined as the same area as the Cape Peninsula Heritage Area. If this is the case then it could be argued that all the money generated in the Cape Peninsula should be returned to the Cape Peninsula Heritage Area Authority.

Would also argue that the investigation into levies (see Guideline 9 above) not be restricted only to those who materially profit from the use of the natural and cultural resources.

Page 14.53, Guideline 14

Strongly support the concept of, supporting local job creation in the tourism industry but that this should be expanded to include local employment and job creation initiatives within the Heritage Area ie local unemployed labour to assist with clearing alien vegetation etc.

(CITY OF CAPE TOWN: CITY FLANIYER)

I refer to Appendix 14 Part C: Cultural and Scenic Features page 14.51:

Under point 5 it is stated that information facilities should be developed at major entrances to leisure areas. While this may be appropriate for some areas it may not be for others. The decision where to place such facilities needs to be undertaken with a sound understanding of how visitors interact with the area they are visiting to ensure these facilities are located strategically and will capture the largest possible audience. As well intended as information facilities are one must never lose sight of the fact that many people will shun such offerings and therefore every effort should be taken to place them where they will be most convenient and likely to be utilized.

(Mr J ffallinan)

Drawing up a code of conduct is not sufficient to correct conduct, some method of policing in a cost-effective manner is necessary.

(F Ivey)

Tourism should be adjusted to suit the natural environment - not vice versa.

(Mr D Stechrnan)

Change 'after commissioned research' to 'using relevant information'

(Mr Jff Avis)

Visitors to 'remote' and 'quiet' areas would be limited, or at least their impact would be limited, by providing very minimal facilities (or none) in those areas. Restaurants/shops etc should be set in areas more appropriately developed for tourists e.g. not at Cape Point.

(Ms D Salters)

CONCLUSION concerning JURISDICTIONAL BOUNDARIES

A greater degree of clarity on clearly demarcated boundaries is required. The MDF initiative backed by sufficient legal enforcement is required.

(Mr C Adams)

It would be useful if examples could be cited.

(Mr JM Fudge)

The extension of the area of operation does not necessarily imply optimal management - rather, an appropriate management policy with strict enforcement will ensure successful implementation of the policy.

(Ms S ffustwick)

The expansion of the jurisdictional area does not necessarily imply optimal management; rather enforceable, sound management policy is required.

(Mr II Gold)

The extension of the area of operation does not necessarily imply optimal management - it is rather management policy and its enforcement that will ensure successful implementation of the proposed policy.

(CITY OF CAPE TOWN. • CITY FLAIYYER)

Most of the people that will be using the Peninsula come from the Cape Flats and thus developments on the Peninsula should be coupled with that on the Cape Flats. Therefore the boundaries should be expanded to include the greater Cape Town area.

(EIYVII?OIYPIEIYTALIST SOCIETY (ffIYSOC))

I strongly object and do not like this title of Heritage area.

(Ms S Louw)

These boundaries are a mess!

(V Matincowitz)

The attempt to include the entire peninsula may result in never ending delays retarding the implementation of other recommendations.

(Mr F le Roux)

MOTIVATION concerning JURISDICTIONAL BOUNDARIES

Agree with the concept of a more holistic °Heritage Area but from a management point of view we need separate 'sub-plans" for marine, mountains, etc. Each receiving specialist attention but being part of a whole.

(Mr D Wightman)

p. 4 final paragraph - keep Sol Kerzner off Robben Island!

(Mr LC McEwan; Chairman; LAKESIDE/MUIZENBERG RATEPAYERS ASSOCIATION)

A more than bold concept!

(Mr N Malherbe)

The question of jurisdictional boundaries will probably be THE most vexed question to be addressed in the study as this is where interests collide and conflicts arise.

It will be essential to have a declaration of spheres of interest by the CPPNE authority where this overlays with local authority boundaries and/or interests.

The spheres of interest will include factors such as:

Environmentally sensitive areas threatened by urban encroachment - (to be defined).

Catchments likely to be adversely affected by urban development or inappropriate agricultural practices.

Scenically intrusive developments.

Management and jurisdictional questions relating to the scale and proximity of development.

It will also be essential to have a defensible position beyond which absolutely no development is permitted. The defense of this line will however be strongly affected by the success of defences and strategies in the grey area between the hard line and present urban development.

MDP is currently examining edge conditions and could contribute constructively in this area.

(Mr C Adams)

Should expand to include:

(1) Cultural components of city and harbour

(2) Natural drainage systems of rivers and vleis.

(INSTITUTE OF LANDSCAPE ARCHITECTS)

Areas already developed, or scheduled for development should be excluded.

(Mr EJ van der Horst)

Subject to comment on Recommendations concerning Jurisdictional Boundaries.

(Mr JA van Wyly Regional Representative; DEPARTMENT OF PUBLIC WORKS)

It is unclear why outlying areas such as Rondevlei and Robben Island are mentioned for possible inclusion, when the more immediate areas such as the coastal area from Camps Bay to Granger Bay have been excluded.

(Pis S ffustwick)

Statutory and legal implications appear to be missing(?) The existing and future role of currently-legal authorities is not addressed.

(Mr if Gold)

We are in full agreement that marine and coastal environment needs to be included in the CPPNE, that present PNE boundaries are not optimal, and that urban and industrial growth be directed away from areas of notable ecological tourist and recreational value.

(THE CHAIRPERSON OF RLCO;• REDHILL LANDOWNERS CONSERVATION GROUP)

- 1. One of the City's Parks & Forests officials was involved in determining the boundaries and understands the motivation. However the document does not 'sell' the idea, therefore this section should be carefully reworded.**
- 2. No addition proposed. We do not share the view that jurisdictional boundaries should be extended insofar as it relates to the legal position as it affects existing rights. It should be noted that controls, however inadequate, already exist eg Seashore Act, Sea Fisheries Regulations, LUPO and the mere substitution of these controls by the suggested new Authority may not achieve the desired goals.**
- 3. There seems to be a totally inadequate understanding of what authorities do - what functions they can/could be responsible for and what 'jurisdiction' means to those authorities.**
- 4. p42 (The Cadastral lines ...) This motivation should emphasise the prime importance of the visual qualities to the future of the tourist industry in the Western Cape. If we destroy this asset by inappropriate development within the adjoining urban area, then we will destroy an industry with its peripheral influence on the Regional Economy. The Cape Peninsula mountains can create jobs in the tourist industry.**

(CITY OF CAPE TOWN• CITY PLANNER)

The built-up environment should also form a major part in the boundaries because a Euro-centric view in South Africa of the environment is not acceptable.

(ENVIRONMENTALIST SOCIETY (ENSOC))

Not complete and somewhat biased in favour of a 'mountain' approach.

(V Marincowitz)

Okay, but CPHA also cuts across 'crest to coastline'

(Mr JE Avis)

RECOMMENDATIONS CONCERNING JURISDICTIONAL BOUNDARIES

- 1. Expropriation or other means of acquiring private land is mentioned in several places as a possible option**

Virtually everyone who has much to do with the Peninsula mountains comes to regard the original granting of land by the State to private individuals as a great mistake and a terrible pity. This is particularly true of most subsequent subdivisions which have made land holdings even more financially non-viable unless used for residential purposes. It is assumed that the reversion to public ownership must

have been considered by the team and that the financial costs of acquisition scared them off.

It is nevertheless felt that this option could have been given more prominence and that ways of achieving such acquisition could have been explored. The original unfortunate mistakes should not be given tacit approval.

2. The 'transitional' or urban fringe areas

It is understandable that the impact of the fringe urban uses on the CPPNE should be recognised and correct that an effort should be made to tackle the problems and seek to gain some control over developments in the fringe areas. However, the method adopted raises some questions.

- a. Firstly, some form of planning control over one or two blocks from the boundary and any adjacent or nearby public open space would be generally accepted but the inclusion of the whole of eg. Fish Hoek, Muizenberg, Kalk Bay and Simons Town including their business is questionable on the claim that they affect the remote CPPNE area.
- b. Secondly, to suggest that these authorities should complete zoning schemes within a year is likely to bring the response that they already have perfectly satisfactory zoning schemes in place, and queries as to under what authority their zoning are being questioned, and if changed in any way, who will pay for any claims which may result.
- c. Regarding provisions for fire, flood and subsidence protection, it is not clear how these will work in practice. Are the relevant authorities to brain or drain the mountainous areas adjacent to their urban developments? Are such actions to stop at their jurisdictional areas or proceed beyond them?
- d. Proposed changes should be subject to TEM. If all urban areas are included, this statement assumes that inclusion of all changes in zoning. Where there is a structure plan in existence, land use changes will already have been taken into consideration and will have been passed by the Department of Environment Affairs. Only where a suggested change conflicts with the structure plan or involves an activity as mentioned in Notice 172 of 1994 (under section 21 of the Environment Conservation Act, 1989) should an IBM assessment be necessary. While a rezoning in, say Main Road, Muizenberg cannot be regarded as relevant, not only rezonings, but any development on the fringes is extremely relevant and should be submitted to some sort of aesthetic committee.

(Mr PM Adams)

A caveat could be added about the danger of protecting so much to such an extent that vast amounts of time and effort are spent on justifying every proposed development. This can slow or stunt development, at least some of which is better than leaving the area untouched.

(Mr P Dennehy)

If you include Robben Island and Rondevlei - what about Rietvlei?

(Mr Z Erasmus)

As the principal recommendation will probably take considerable time to process, inclusion of the entire length of the Silvermine river within this CPPNE should be handled as a separate exercise as a matter of urgency. This has been publicly requested by residents of Fish Hoek. The Silvermine is the only river in the Peninsula to survive in a near natural state, and the lower reaches are under considerable urban pressure. Map on p.52 should show entire river as 'QUIET AREA'.

(Mr L Walter; Representative; FISH HOEK RESIDENTS ASSOCIATION)

'Heritage; sounds rather old-fashioned - but I don't have a better word to offer!

(Mr WII Thomas)

Not enough detail. For the protection of development on Robben Island it should definitely be included.

(Mr N Malherbe)

Agreed, but a clearer demarcation of the natural and urban environment, rural and urban, based on inherent suitability and existing uses, needs to be made - and then tested.

(Mr B Oberholzer)

The area called CPPNE should be expanded by means of well defined defensible boundaries. A soundly motivated case to achieve this must be presented which addresses the concerns mentioned in 4.4.2.

(Mr C Adams)

Historical buildings to the west of the Salt River - Muizenberg line should be included. Suggest Heritage area is moved east to this line.

(Mr If !Turk)

Add: 'Relationships, responsibilities and relative decision-making abilities of the CPHA authority and the various other authorities are not spelled out and (I think) not clearly understood.'

(Mr 5 Townsend; member; CAPE INSTITUTE OF ARCHITECTS)

We think areas such as Princess Vlei, Zeekoevlei, Rondevlei, Black/Liesbeeck system, Paarden Island, Rietvlei etc should also be included either by expanding the boundaries or by declaring certain 'outlying areas' as included; ideally also Robben Island.

(Ms Pf Thesen; Chairman; FRIENDS OF THE CAPE OF GOOD HOPE IYAMIRE RESERVE)

It is unrealistic to include the entire Cape Peninsula in the proposed control area. The natural/semi-natural areas should be included in the proposed new control area (as proposed), but the urban fringe areas should be excluded and controlled by the Local Authorities, but within the zoning of formal acceptable structure plans and coordinating structures.

I have serious problems with some of the conclusions and recommendations in your report as follows:

- 1. The inclusion of the urban fringe area into the control area seems to be unrealistic. Control over structures and extension to the urban area should be undertaken by formal land use zoning plans, undertaken through the normal accepted procedures**

for structure planning, and based on the input from the authority managing the central control area, The real objective in dealing with the urban threat to the core area is certainly to determine what land use can and cannot be allowed, and associated infrastructure, and not to deal with minor matters of a highly technical nature and of large volume associated with normal urban town planning and administration. Alternatively the legal instrument for the controlling authority could specify this and make provision for its use in any land use planning activity of any local authority.

2. Your conclusion and recommendations regarding a management authority need revision. Whilst your report highlights the importance on a national and international level of the natural and cultural attributes of the area, you recommend that a new authority be established to manage the area, without considering alternative existing authorities. This fragmentation of authorities should be avoided and should also be seen against the background of the Government's recently-formulated policy on categories of protected areas as stated in Government Gazette No. 15726 of May 1994 and associated management authorities. Our own assessment of the merits of the Cape Peninsula Mountain Chain area, as well as the assessment in your report, very clearly spells out that it fulfills all the relevant criteria as a national asset and should therefore be declared as a national park, for management by the National Parks Board.

In conclusion I would like to state that the recommended functions and powers which you spell out on pages 58 and 59 of your report can all be undertaken within the existing legal framework and strategy of the National Parks Board and is already implemented at various other locations in the country. I can provide you with more details should you require this.

(Mr ND Geldenhuys; Executive Director: Southern Parks; IYATIO1YAL PARKS BOARD)

The position of private landowners, especially within the 'remote' and "quiet" functional areas needs to be addressed, as they will lose current rights to build etc. Also as mentioned before, the issue of multiple controlling authorities need to be more fully addressed. The current situation is inefficient and leads to "buck-passing" and paralysis. The proposed expansion should therefore depend on finding a solution to this problem, otherwise a smaller, more manageable CPPNE may be more appropriate.

(Mr B Kopfer)

Yes, it should be expanded but, more urgently, is the need to include the as yet undeveloped 'urban' areas in the CPPNE, e.g. South West of Simon's Town and the area South of Camps Bay.

(Mr PI Callaghan)

Rivers are amongst the most inadequately understood and inefficiently managed systems. I would emphasise the river corridors, since they are among the most neglected and complex systems (biodiversity, engineering, jurisdictional), yet have large potential for enhancing the quality of human life (recreation, human-natural environment interaction) and encouraging biodiversity. Natural and human-made wetlands should also be included since they are important adjuncts to rivers systems.

(Mr D Wheeler)

I would like to see included in the proposed area (only in so far as their management would then be integrated into the larger 'natural area management plan') the very

important patches of natural vegetation persisting on the flats of the Peninsula: e.g. Kenilworth Race Course, Rondebosch Common, Rondevlei, etc. From a biodiversity conservation perspective it is highly desirable that they too come under the jurisdiction of the proposed Cape Peninsula Authority.

(Dr IAW MacDonald; Representative; SOUTHERN AFRICAN NATURE FOUNDATION)

Urban areas should be included because of their cultural richness. So should the wetlands and vleis.

(Ms S Howes)

I support the recommendation strongly. It should have happened a long time ago. It must be implemented immediately. It is almost too late - our mountains and wetlands are already partly destroyed.

(Mr JM Fudge)

Sandvlei and Westlake Wetlands need to be included.

(Ms C Bingess)

Should expand to include:

- (1) Cultural components of city and harbour.
- (2) Natural drainage systems of rivers and vleis.

(INSTITUTE OF LANDSCAPE ARCHITECTS)

1. Any developments by any State/Govt/Provincial dept within any given jurisdictional area MUST not be given arbitrarial 'go-ahead" without the scrutiny and approval of ALL PARTIES within such jurisdictional area, e.g. Prisons, Highways, Police, Defence etc. (legislation required)

2. Crests, ridge lines to be left as open space i.e. no selfish domination of view sites.

(Mr P Gray)

Areas already developed, or scheduled for development should be excluded.

(Mr EJ van der Horst)

The scale of Figure 2 (page 3) is inappropriate to determine the recommended jurisdictional boundaries and therefore input in this regard is withheld.

(Mr JA van Wyk Regional Representative; DEPARTMENT OF PUBLIC WORKS)

Include, specifically: Botha's Camp, Cllencairn Mountain, Simon's Town Waterfall.

(P Salter; Representative; SIMON'S TOWN FLORA CONSERVATION GROUP)

Boundaries of study area should include systems which are inextricably tied to the Peninsula mountain chain e.g. rivers, movement routes. The acquisition of additional land needs to be addressed.

(Mr E Manus)

Need to emphasize the holistic inclusion of all parts of the Cape Peninsula as a functional ecosystem - i.e. mountains and sea: 'Coast- to-crest'l a vital concept.

(Mr DJ McDonald)

"Urban fringe": It is unclear how much of the urban fringe has been included. What criteria decide that only a narrow strip of urban development be included. Certainly the entire City Bowl is part of the Peninsula's heritage.

(Ms S ffustwick)

However, practicalities are crucial to the success of this proposal. Statutory and legal implications appear to be missing(?) The existing and future role of currently-legal authorities is not addressed.

(Mr II Gold)

The present CPPNE status should be maintained but the area should be expanded to include marine and coastal environments, river corridors and Robben Island. This PriE together with the demarcated urban fringe should be declared the Cape Peninsula Heritage Area. We are in full agreement with the IEM procedure being adopted for development proposals in the CPHA.

(THE CHAIRPERSON OF RLCO; REDHILL LANDOWNERS CONSERVATION GROUP)

1. The practical, financial and staffing requirements to achieve all the objectives within the extended boundary need to be carefully considered.
2. p44 (Proposed changes) Environmental impact assessments must include visual impact assessments. (p24, para 1 and Section 4.4.3: p44, para 2)
3. The comment that all changes to land which contravene policies arising from the report should be subject to an environmental impact assessment is extreme and unreasonable, particularly in relation to other priorities facing all public authorities in the region. Land use changes occur at a multitude of scales, not all of which should necessarily be subject to EIA procedures directly. Rather, one would see these procedures included at a 'higher level in a planning process which would, amongst other things, prescribe criteria for deviation at lower levels.
4. A uniform set of management controls should be established and such controls should be exercised by one body. However, the appropriate body should be the mooted Metropolitan Council, for, inter alia, the following reasons:
 - i) This Council will be fully representative of the community;
 - ii) it will also control functions such as town planning; and
 - iii) it will probably have funds.
5. While accepting that the entire Cape Peninsula requires "special protection", a policy for the CPPNE and simply extending the boundary across urban development, roads and into the sea is not the most appropriate way to achieve this.
6. It is recognised that the boundary of the CPPNE requires modifications to recognise environmental factors, rather than simply cadastral factors; but to include major parts of the urban fabric is not acceptable.
7. Of paramount concern is the extension of the existing boundary of the CPPNE to a possible boundary of the 'Cape Peninsula Heritage Area' (CPHA), as per fig.2, page 13. This appears to have been proposed without adequate explicit and rational argument and is opposed. The reasons are:
 - a) lack of objective evidence for extending the CPPNE into urban areas, which are subject to a series of other legislation, such as LUPO and Planning Schemes.

b) controls proposed for CPPNE are totally inappropriate for urban areas, where built form and future development criteria need to be addressed.

c) inadequate consultation with existing residents in these areas, and similarly with existing local authority structures.

(CITY OF CAPE TOWN: CITY PLANNER)

(NOT to be taken as a formal response from the MAC).

1. Are there any scientific reasons for excluding from the proposed Cape Peninsula Heritage Area (CPHA) certain riverine systems that originate within the existing CPPNE area, eg the Liesbeek and Sandvlei systems?

2. Robben Island should be included in the proposed CPHA.

3. The proposed CPHA Authority should not supercede the existing authority's jurisdiction of the marine environment, but should control or regulate any changes to existing uses of the marine environment and promote its sustainable use.

(Dr DM Richardson; Acting Chairman NOT FORMAL MAC RESPONSE; CPPIYE MAC SCIENCE/TYPIC SUB-COMMITTEE)

Pages 43 and 44:

The proposed extended boundary of the LNE through the urban fringe is considered to be arbitrary and not founded on agreed criteria. It is important that the proposed boundary be established in a democratic and participatory manner and be based on agreed criteria. The process should be inclusive rather than exclusive. It is accordingly suggested that the proposed boundary amendments should not merely be established in consultation with the proposed Park Authority and the proposed Metropolitan Authority, but also with the affected existing and future local authorities. The process must also make provision for public hearings.

It is not only the marine boundary that requires further detailed investigation but also the boundary through the urban fringe and the river corridors.

(Mr C Sullivan; Chief Executive Officer; IlfiCRSC)

Boundaries should be expanded to include the greater Cape Town area. Because any plan for the peninsula cannot be considered/seen in isolation from the metropolitan area.

(ENVIRONMENTALIST SOCIETY (EISOC))

Not complete and somewhat biased in favour of a 'mountain' approach.

(V Marincowitz)

Could you provide clarity about the following:

Does the CPPNE boundary go up to the LWM? If not, does the boundary go to the HWM? If it is to the HWM then what happens to the area between the boundary and the LWM.

(P Ivey)

Expand to include areas needing actual physical management surrounding areas needing development controls can be tackled through existing legislation or with amendments.

(Mr JE Avis)

Provided that we still manage to maintain local democratic accountability in any structures that arise.

(Ms D Salters)

The attempt to include the entire peninsula may result in never ending delays retarding the implementation of other recommendations.

(Mr P le Roux)

CONCLUSION CONCERNING FUNCTIONAL AREAS

Most of the Peninsula settlements such as flout Bay, Noordhoek etc. are only half developed on present zoning, and already they give the feeling of being developed to near their 'carrying capacity. The numbers of houses, and presumably roads, are set to double. It is not clear to me where further increases in carrying capacity can be made without ruining the area. Increased density in Simonstown/Muizenberg where there is access to good public transport could be considered, but this would be at the expense of the present character and ambience of these areas.

(Mr PM Adams)

1st sentence O.K.

CPPNE was never requested and had no study on area demarcation. Kindly delete 2nd sentence, as it leaves the wrong impression completely. Not necessary to making conclusion.

(Mr N Malherbe)

This is a flawed statement - traditionally the optimum areas for development were built on, the best soils were farmed and the catchment areas conserved - they followed the inherent 'carrying capacity to some extent - modern development, it is true, tends to be less discriminate.

'Carrying capacity' as a concept is not an exact science - It depends to some degree on design sensitivity and management efficiency. Unfortunately, economics is usually the main factor today in determining carrying capacity, (and political expediency) rather than ecological determinants.

(Mr B Oberholzer)

I feel strongly that you are on the right track on this issue.

(Mr B Kopfer)

The Smitswinkel Bay area does not completely fit into any area. It has characteristics of quiet, remote and leisure categories, with no potential for any of the 'envisaged facilities for a leisure area'. It includes areas that will tolerate no disturbance at all, i.e. rare flora, steep slopes, as also scenic disturbance.

(SMITSWIPMEL BAY RESIDENTS' ASSOCIATION)

Above statement is not sufficiently specific. There should be a stipulated exclusion of heavy or dense industrial development together with informal and mass housing.

(Cl Manson-Kidlin / GI van der Spuy; Representatives; LLA1YDUDNO LOCAL COUNCIL)

Suggest adding the following to 4.5.1: There is in addition, often an inappropriate usage of the land where the inherent determinants for correct usage have been disregarded.

(Mr PI Callaghan)

Transitional areas should be treated very carefully as most of the environmental damage is being done in these areas.

More examples are needed to give more background to the classifications. The whole matter is inclined to be up in the air.

(Mr JM Plidge)

The issue of carrying capacity is a useless one - open to personal value judgement.

(Prof G Branch)

No mention of the finite limit carrying capacity of human habitation (Residential) that needs to be established, not just the effects.

(Mr I' Gray)

Over-critical and negative. Delete last sentence.

(Mr EJ van der Hoist)

We feel that more clarity required regarding "canying capacity in natural areas. Heavy use or traffic in natural areas can only lead to degradation, eventually.

(P Salter; Representative; SIMON'S TOWN FLORA CONSERVATION GROUP)

I believe that this is the correct direction but probably a lot more detail is needed especially in transitional and leisure zones. Also 'remoteness' as measured by proximity of metropolitan noise and visual pollution is not necessarily a good measure - there are areas on the face of T.M. which could well be regarded as remote.

(Dr OW Davis)

Air rights, landing rights need addressing.

(Mr E Manus)

Fully support!

(Mr 1Y Gold)

The report claims that some areas can tolerate intense human use. What cannot be denied, however, is that no natural area can sustainably tolerate intense human use. Areas subjected to substantial and protracted impact cease to function as natural ecosystems. Rampant development and uncontrolled use will, in a short space of time, destroy most of the natural environment and scenic beauty of the Cape Peninsula and will radically lower the quality of life of inhabitants and tourists. Admittedly, devising a system of functional areas is a fairly good tool for ensuring the sustainable use of the natural resources of the Peninsula.

(TIDE CHAIRPERSON OF RLCO; REDFILL LANDOWNERS CONSERVATION GROUP)

An area which is heavily disturbed may be able to 'carry more intensive use e.g. areas which have low density housing may be able to have more intensive housing. However, Kirstenbosch Gardens may also be able to have high density housing but is it

appropriate. Is it not important to include a measure of whether the development is appropriate or not? This is probably dealt with in functional areas.
(P Ivey)

Development without impact assessments continue to happen.
(KOMMBWIE ENVIRONMENTAL AWARENESS GROUP)

The last sentence 'Use and management objectives-nor in a peninsula wide context' - TRUE especially where there are many opportunities of cramming many people into a facility where revenue (or profit) can be made.
(Mr D Stechrnan)

MOTIVATION CONCERNING FUNCTIONAL AREAS

1: No master plan exists - quite adequate
4: Recognise size of perceived aggravation leading **up** to 2004 and respond appropriately.
(Mr N Malberbe)

'Insensitivity of use per se, is not an adequate measuring cup - qualitative, as well as quantitative criteria apply - not all development is destructive.
(Mr B Oberholzer)

A successssful bid for the Olympic Games will result in increased tourism and this would have a detrimental effect on the environment if there is bad management or scenic features, etc.
(SMITSWINIfEL BAY RESIDENTS' ASSOCIATION)

Above statement is not sufficiently specific. There should be a stipulated exclusion of heavy or dense development together with informal and mass housing.
Manson-Ifullin / GI van der Spuy; Representatives; LLANDUDNO LOCAL COUNCIL)

Suggest adding to the second paragraph of 4.5.2: 'Inappropriate forms and intensities of use..'
(Mr M Callaghan)

Much more detail is required - more examples needed.
(Mr JM Fudge)

1. p45, paragraph 4 - The situation will not only be aggravated by the successful bid for the Olypics, but would also be aggravated by other big events. The decision taken by the government (local) to develop tourism as one of the important functions of the Western Cape will also play an important role.
2. The establishment of functional areas will also make decision- making and management of the area much easier. Clear guidance will then be available on what is expected of the area. This comment can also be seen as a motivation to establish functional areas.
(Ms P van der Spuy; Representative; SOUTII AFRICAN TOURISM BOARD)

Over-critical and negative. Delete last sentence.

(Mr EJ van der Horst)

No provision is made to link the patchwork of areas.

(Mr Manus)

The false economy created by a successful bid for the Olympic Games in the long-term, is I believe, cause for concern. The pros and cons of such an event should be 'fleshed out'.

(Mr 134.1 McDonald)

The Cape of Good Hope Nature Reserve has an approved management plan that integrates nature protection, recreation and other uses. It is therefore suggested that the first paragraph be amended to read as follows:-

Other than the Cape of Good Hope Nature Reserve the Cape Peninsula nor the and other human uses.

(Mr C Sullivan; Chief Executive Officer; WCRSC)

2nd item - RE: scenic features: what about those huge ugly notice boards placed by WCRSC along the 'Scenic Drive' from Simon's Town to Smitswinkel Bay? 4th item - RE: Olympic Games: This will be a further burden on the natural environment.

(Mr D Stechman)

RECOMMENDATIONS CONCERNING FUNCTIONAL AREAS

Overnight facilities: From the table, Leisure Area, Reasons for Classification:

In view of the location of the study area in the Metropolitan region and the abundance of urban developments all round and throughout the Peninsula, it is questionable whether there is a need for overnight facilities in the CPPIIE area itself. The introduction of overnight facilities, even if carefully controlled, should rather be seen as the thin edge of the urbanisation wedge which carries behind it a development force which is usually administratively difficult or impossible to resist in the long term. Overnight facilities should rather be encouraged in already urbanisation adjacent areas by means of adjustments to existing residential zonings.

(Mr PM Adams)

p.46. Do we require 2 years for the preparation of a masterplan?

It is hoped that the Leisure nodes shown on Plateau Road and Red Hill Road are envisaged as 'Low'. Picnic areas there is a need for. Overnight accommodation should not be pressed into the middle of a nature area which is easily reached from nearby urban centres. Other urban functions such as nurseries, potteries, curios, tourist nick-nacks, jazz concerts etc. should be removed from the area. So should the squatters who work in surrounding urban areas which find it easier to leave them "agter die butt" than to provide for them.

(Mr PM Adams)

The term 'transitional' could be misleading. 'Settled' is a possible alternative. Transitional may be a more appropriate name for the 'QUIET' area, which provides a transition between 'remote' and the more used areas. The entire Silvermine River should be included in the 'QUIET' area. (see 4.4.3)

(Mr L Walter; Representative; FISH HOEK RESIDENTS ASSOCIATION)

1. Expand number of High Leisure Nodes. Constantia Nek etc.
2. Remote/Quiet Area - User Pay.
(Mr N Malherbe)

I'm surprised that the marine portion of the proposed C.P. Heritage Area stopped at about Bakoven and did not extend northwards as far as Mouille Point (see Pig 2, p 15).

- (a) This area has two types of coastline
 - (1) the large granite boulders, domes and headlands and
 - (2) the wave-cut platform bevelled across the Malmesbuiy Shales and hornfels.
- (b) The famous intrusive contact between the Cape Granite and the Mahnesbury Shales.
- (c) The particular part of the coast is heavily used for recreational purposes such as bathers on the relevant beaches, fishermen on the rocks, scuba-divers off Mouille Point and board-surfers also off. Mouille Point (near Granger Bay Technikon College).
- (d) Dolphins are quite common off Mouille Point.
(Mr I Gerrard)

'Transitional' is too vague and underestimates the value of outstanding historical/cultural sites and settlements. Agriculture should exist in right of its own - conjures up 'ruralness' and openness - even nature!

Over-simplified to have only 4 categories - there are overlapping zones, as well as gradients - and corridors (scenic routes). This section of the report, of all the sections, seems to lack proper 'planning' input/expertise, and therefore lacks sophistication.
(Mr B Oberholzer)

Expand the number of high-leisure nodes i.e. Constantia Nek. Identify remote/quiet areas. Use of user-pays and permit system to have low volume and minimal disturbance, yet financial aid to sustain management.
(Mr C Adams)

1. Should quarries and mining be placed under 'utility sites'? Would a municipality run a mine or quarry to benefit residents?
2. Structure plan should be in place in time to allow for pre-1997 Olympic requirements concerning infrastructure.
(Mr I? Hunt)

Excellent. With respect to the Red Hill area, I enclose a copy of my final input to Cape Provincial Administrator regarding the identification for land for the Redhill community, as we now feel that a portion of Redhill should be declared a 'transitional' area to accommodate this community.
(Mr B Kopfer)

Air space infringements had not been addressed. The Committee was adamant that no commercial helicopter landing sites should be permitted.

(The Secretary; TABLE MOUIYTAIN AND SILVERVIIIYE IYRAB)

The Smitswinkel Bay area is wrongly classified (See comment 4.5.1)
(SMITSWIILIFFEL BAY RESIDEIYT5' ASSOCIATIOIY)

Tabulation does not provide for sufficient categories e.g. Llandudno as a 'Transitional Area' has none of the facilities listed.

(Ct Manson-KuLlin / CI van der Spuy; Representatives; LLANDUDNO LOCAL COUNCIL)

'Transitional' should rather be termed 'urban'. The depiction of the Leisure areas on the plan should be confined to existing formal recreation areas. Quiet areas should be broadened to allow for the acknowledgement of certain existing inconsistencies (e.g. Smitswinkel Bay) and also the possibility of including leisure areas within it (subject to strict adherence to EIA's) - for example those indicated along Plateau Road in Red Bill Road.

(Mr M Callaghan)

Par too little 'leisure' has been allocated (both low and high) to accommodate public, local and overseas tourism.

(Councillors P Landen and V Ifabalin; Councillors; FISH HOEK MUNICIPALITY)

- 1. Access control nowhere mentioned. Vitally important.**
- 2. Cleansing services not mentioned.**
- 3. Limited mountain-biking is mentioned in 'Quiet' areas. I should like to see mention of cycle paths in Transitional and Leisure Areas. In high density areas these are needed for the community (especially school children), and in low density areas for the serious sports cyclists and the leisure cyclists. If not paths at least wide shoulders on the roads.**

(Ms S Howes)

Examples should be given - up in the air.

(Mr JM Fudge)

Keep ideas as simple as possible to start off with. It is too complicated - couldn't 'quiet' and 'remote' areas be combined - in essence they are serving the same function. Fig 6 is impossible to read due to toning. Please use different symbols (lines/cheques/dots/etc.) in future.

(Ms C Burgess)

The study area is of immense diversity and limiting it to four categories subjects it to broad generalisations (loss of opportunities).

(INSTITUTE OF LANDSCAPE ARCHITECTS)

COMMENTS: p53 paragraph 4

The goal for each functional area should not only be to protect people and property from risk, but also to maintain and if necessary enhance the landscape that made the Western Cape and in particular the Peninsula well known.

(Ms I van der Spuy; Representative; SOUTH AFRICAN TOURISM BOARD)

The issue of real property rights in terms of the above recommendation is not clear.

(CHIEF EXECUTIVE OFFICER; ; LOCAL COUNCIL OF CONSTAIYTIA VALLEY)

The proposed system of functional areas is supported in concept, but is considered too crude to deal with the reality that exists in the Cape Peninsula. The system of functional areas/zoning is considered the most fundamental management tool in the report. As such we consider it absolutely essential that further investigation of this aspect be carried out and must include expert input and extensive public involvement before it is finalised. For example, 'Transitional' areas need to be between rural and urban and may contain areas requiring 'remote' type of protection.

All existing facilities in the Remote and Quiet Area must be evaluated via the IEM procedure to decide for example:

- whether they are really needed
- whether there are better alternatives
- what ultimate closure and rehabilitation should apply.

(Messrs J Levy and L Coelen; REFRESEIYTATIVES; MOUIYTAUY CLUB OF SOUTH AFRICA)

NOISEI

The MCSA is concerned that there is not enough emphasis on how noise pollution will be controlled - specifically:

1. Aircraft, Helicopters, Microlights etc..
Recommend investigate minimum flight height above land surface over CPTIA.
Helicopters must be permitted to take part in rescue missions, and to practice therefor.

2. Radios, shooting ranges.

(Messrs J Levy and L Coelen; ; MOUNTAIN CLUB OF SOUTH AFRICA)

Max. carrying capacity of human habitation/development to be set/established.
(Mr P Cray)

Should apply to future TNE' or 'Heritage Area only.
(Mr al van der fforst)

Does the principle make allowance for the proposed bike-path?

(Mr J Stegmann; Trust Chairman; WFPPA TABLE MOUNTAIN BIKBFATH TRUST)

Both Quiet and Leisure areas incorporate many major transportation corridors and should therefore allow for their expansion subject to appropriate EIAs. This should be indicated under Development Rights and Envisaged Facilities in Table 1.

(CA Rose; Representative; SOUTHERN AFRICA ROADS FEDERATION)

page 48, under 'Reasons for Classification':

- Remote Area: should read '.... is capable of withstanding ONLY limited human use WITHIN DESIGNATED RESTRICTIONS'
- Quiet Area: should read '.... is capable of withstanding SOMEWHAT greater human use WITHIN STATED LIMITS'.

(AN Starke)

1. Protection of natural ecosystems where activities subject to strict policy of sustainable use.
2. Minimise impact of urban fringe on natural areas.

3. We recommend, too, that Functional Areas, in UCT's and van Niekerk, Klein & Edwards' South Peninsula Sub-Regional Plan bear the same names and descriptions.
(F Salter; Representative; SIMON'S TOWN FLORA CONSERVATION °ROM

There is not much distinction between remote and quiet areas. Quiet areas are very similar to 'low' leisure areas. Biosphere concept of no-go, protected, permit-only for remote areas needs to be considered. Utility sites (quarries, mining, effluent outfalls, refuse dumps) in remote and quiet areas does not correspond with policy objectives - i.e. rehabilitation of past human activity - if the category is not ammended, it will be open to too much interpretation. The two halves of the mountain chain make no provision for movement corridors or °green* links - e.g. Hout Bay/Constantia Nek - the link is broken. So too with Fishhoek/Sun Valley/Kommetjie. There is no provision for 'no development' areas - should include remote and quiet areas.

(Mr E Manus)

If proposed area extends into the sea should not reefs, rock pools etc. form part of the descriptions under 'Type of Habitat' on page 49?

Also use 'Diving' page 50.

(Mr J Fawkes)

From what database has the Figure 6 Schematic been derived? Management should be cast in the form of 'A structure plan/growth management strategy' - 'Masterplan' is prescriptive and outmoded as a term.

(D Thomas)

Would like to see how these zones fit in with existing legislation and property rights. What are the legal and financial implications?

(Ms S flustwick)

IMPLEMENTATION SUCCESS is crucial. Much work needed to remove legal constraints, and financial. Need hardcore no-go conservation areas regardless of what society currently desires. Responsibility for long-term protection of natural assets must not be left entirely to transient beings.

(Mr If Gold)

We would propose that the CFA should have two overarching functional areas:

- i. the protected natural environment where the priority would be to protect natural eco-systems and where activities would be subject to a strict policy of sustainable use, and ii. the urban fringe where the priority will be to minimise impact on the PNE (including the present UTNE plus areas that are under consideration for incorporation).

We recommend the proclamation of four functional areas for the PNE, namely: Primary Natural Area, Conservation Worthy Area, Low Leisure Area and High Leisure Area. The Urban Fringe should have two functional areas: Low Density (eg. Scarborough, fringes of Fish Hoek & Simons Town) and High Density (eg. Fish Hoek Central Business Area).

This Report's 'remote' and 'quiet' area as designated on the map are too fragmentary. The South Peninsula Sub-Regional Structure Plan's 'Primary Natural Area' and 'Conservation Worthy Area' as depicted on their map constitutes a more secure Spatial Framework visualisation.

Managing, protecting and preserving eco-systems will be more efficient the more unbroken the area is eg how the 'Primary Natural Area' is depicted in the Sub-Regional Plan. The names for functional areas suggested in the Report are considered infelicitous: only Low Leisure and High Leisure are acceptable. VKE's Southern Peninsula Sub -Regional Structure Plan has more appropriate names. It is also not sensible that the same area should have a different name or whimsically conceived, they have to be seriously and unambiguously zoned in adaptability^o would be quiet inappropriate. Referring to the map, what in essence is the difference between Remote and Quiet? At IUawer one finds transitional right in the middle of Remote, with no Quiet in between! NB. Neither 'remote' nor 'quiet' refer in any way to the biodiversity status of the areas thus categorised. On the whole we are in agreement with the following:

'overall management objectives'

'development rights'

'method of access into area' (but strongly opposed to jeep tracks in 'quiet area')

'envisaged recreation & tourism activities' (but mountain biking and horse riding must be properly controlled and only allowed in areas where policing mechanism are in place to ensure that users don't stray from the paths and are obliged to pay for maintenance of these paths. We are also not persuaded of the appropriateness of granting blanket permission for formal or informal trading in 'leisure areas'.

'envisaged facilities' (but no litter bins in 'quiet area' of Southern CPPNE - people should be made conscious of the need to remove their own litter; also baboon and strong winds will cause litter to be dispersed over the entire area;

'taps and ablution facilities should only be provided where water is available on the spot in 'leisure area'; only single chalets or 'eco-cabins' which provide some kind of wilderness experience to users to be provided; strongly the kinds of elaborate accommodation that can be, and is, provided in the urban fringe:

'the area should retain a distinctive character that sets it apart from 'citified' norms and values). Hiking trails with overnight stops should be available in Transitional and Leisure Areas Only. 'REASONS FOR CLASSIFICATION' - 'quiet area', as depicted in the Southern CPPNE is by no means less remote from the Metropole than 'remote area', although it's true that the former area is generally alien infested it is restorable, and priority should be given to its full rehabilitation so that more of it could go into the highest conservation category, 'remote' greater human use would decrease its conservation potential and impact negatively on the eco- systems of the 'remote areas' in the Southern CPPNE. 'INTENSITY OF USE' - leisure area in the Southern CPPNE should be **restricted to 'LOW LEISURE'**, so that intensity of use should only be moderate.

(THE CHAIRPERSON OF RLCG; ; REDHILL LAIDOWNERS CONSERVATION GROUP)

The broad principles for environmental control as stated in your Draft Policy for Multipurpose Use of the Cape Peninsula, are agreed with. Additional comments by the South African National Defence Force (SANDF) on the Draft Policy are stated below:

The SANDF is a major user of land, air and sea in the Cape Peninsula area. Although the SANDF is firmly committed to meeting its environmental obligations the nature of military activities necessitates periodic noise and to a lesser extent, air pollution.

Increased vehicular, air and maritime movement are carefully co-ordinated and controlled to reduce any adverse impact. Current activities are essential and continuation thereof is critical. Any future policies of the use or management of the Cape Peninsula will have to take cognizance of this fact. No policy should be considered which could impede military operations or in peacetime reduce the efficiency of force preparations to unacceptable levels. Environmental issues which could interface with the activities of the SANDF will of necessity have to be discussed by the interested and affected parties prior to formulating policy.

Environmental Impact Assessment - The recommendations in your report would make Environmental Impact Assessments (EIA's) obligatory for new SANDF activities. However, regulations with regard to obligatory EIA's are presently being prepared by the Department of Environment. Affairs for certain activities of the SANDF, which in any case would enforce the same principles. SANDF Environmental Contribution - The SANDF, particularly the SA Navy has made a substantial positive contribution to environmental conservation in the Cape Peninsula for example, protection of rare plant species, alien plant control, erosion control, policies on marine pollution and restrictions on maritime movements in False Bay with regard to the protection of whales.

(O.C. IYAVALE BASE, 'SIMON'S TOWN')

Comments re functional areas, especially the urban fringe. Existing problems we have come across, especially - the City Bowl and Signal Hill areas of the mountain are:

Dumping, Littering, Erosion. Loss of indigenous plants.

Pollution by humans (using the fringe as a toilet, to put it politely). Little respect for nature - eg. harassment of invertebrates like scorpions (overturning of stones to capture these). Haphazard and unplanned fires. Waste of resources on cutting firebreaks which serve little purpose. Overnight camping and squatting ('bergies').

Uncontrolled growth of known invasive alien plants (especially by property owners on the very boundary of existing reserve). Drinking and bottle-smashing. Dagga-smoking. 'Lurking and loitering' - the fringe presents cover for opportunist house-breakers, burglars, and other criminals. Trampling of veld, by inter alia - cyclists, hang-gliders, plane-fliers, short cutting walkers. Lack of security - your emphasis on safety seems to overlook the needs of women walkers and nature lovers. You seem to worry more about people falling off cliffs than people being attacked, especially women. Men can usually walk alone in safety; women need to be in pairs at least, or have a dog for a measure of security. There seems to be a male sexism (and an anti dog attitude) that overlooks the outdoor needs of women.

So another problem is the lack of a 7-day week patrol of the urban fringe.

The use of fire as a management tool is accepted provided it is planned researched and properly controlled. The general public needs to be educated in this respect.

Job Creation: Paths (maintenance or construction), signage, clearing of invading plants; harvesting fire wood from cleared areas (and clearing of beaches of

driftwood and recyclable materials); anti-erosion projects - are merely some ideas for job creation.

Invasive alien plants: This serious problem needs to be urgently addressed. Most people seem to be aware what needs to be done it is past time that action by dedicated squads (not just a few volunteer hack groups) was taken.

Informal Settlements/squatters/bergie camps: The great dangers providing services, especially water, at visitor/tourist sites would be the attraction for 'informal settlers'.

Security: Unfortunately, where tourists and visitors tend to gather so do opportunists like pick pockets, muggers etc . Likewise, vandals seem to be drawn to such places - smashing of signs, benches, graffiti, etc. Security must be a 24 hours, 7 day a week presence - visitors must be safe and feel safe. Nor must it be forgotten that the geology, flora and fauna must be kept safe also.

Provision of Services: I would urge that services be provided only at existing degraded (which must of course be improved) sites. For example, make Kloof Nek a major site for parking, toilets, refreshments and other visitor services - do not seek new sites or extend Lion's Rump (only 4 minutes drive away).

Noise Pollution - Helicopter flights for sight seeing (non emergency flights) should be banned! - not only in quiet and remote areas.

Mountain hikes: Should be allowed only on a few well specified routes with surfaces able to withstand the wear and tear. The same goes for horse riding.

Cheap accommodation for back packers: Since the mountain area is really readily accessible from the city and suburbs, camp and tent sites should not *be* allowed.

Question: How will the intensity of prescribed use be monitored and kept within permitted/desirable levels?

(Ms ON Russell)

The report is very comprehensive and commendable - also the manner in which you went about it. I even like your 'functional areas'.

Access control and enforcement should be important issues in the next phase of the investigation.

(Dr P Blignaut; Representative; BLIGIYAUT AND ROMMELAERC)

1. **The principle is sound. There will have to be considerable refinement of the categories before they can be implemented, however.**
2. **The remote and quiet areas imply the need to define a core conservation area. The ultimate goal should be to ensure that these two areas ultimately receive higher legal conservation status such as Nature Reserve.**
3. **The legal implications of existing development rights, zonings, etc. need to be exhaustively investigated.**
4. **Insufficient consideration has been given to the meaning of 'management' etc., particularly of the 'transitional areas'**

5. The suggestion that 'functional areas' be added to existing land use categories is considered to be impractical and the legality of these proposed 'functional areas' needs to be thoroughly investigated vis-a-vis the Land Use Planning Ordinance and the Constitution.
6. p46, (An area specific masterplan) It is recommended that area - specific masterplans be prepared for functional areas within two years of the Peninsula Heritage Area Authority's formation. On page 53, (Relevant authorities) of the same section, it is recommended that authorities in Transitional' areas should complete (or review?) Zoning Schemes for these areas within one year of the Authority's formation. This does not make sense. By definition, the preparation of indicative and directive control measures should be preceded by planning. Zoning Schemes cannot be completed or reviewed fully prior to completion of planning.
7. The impact of policy recommendations on existing use rights in terms of Zoning Schemes should be fully explored. Rights cannot be removed willy nilly, even if deemed desirable, without the payment of compensation.
8. Should the CPHAA be constituted as a separate local authority', the Council can continue to administer the Zoning Scheme and National Building Regulations and Building Standards Act, 103 of 1977, in this area on an agency basis.
9. Controls proposed for CPPNE are totally inappropriate for urban areas, where built form and future development criteria need to be addressed.
10. Inadequate consultation with existing residents in these areas, and similarly with existing local authority structures.
(CITY OF CAPE 7191V/Y: CITY PLAIYIYER)

(NOT to be taken as a formal response from the MAC) FUNCTIONAL AREAS:

The concept of zoning the Peninsula into functional areas is fully endorsed by the Scientific Sub-Committee. However, a considerable amount of thought still needs to be put into various aspects. These issues could have major administrative constraints and consequences if not addressed prior to the final document being published:

1. Each area needs a concise definition.
2. The set of criteria upon which the zones are distinguished in the document are open to many interpretations (eg what is a physically fragile area?). To be meaningful each area needs to be carefully circumscribed. This circumscription needs to be based on a set of rules which will form a rational basis for authorities to use as their term of reference.
3. The information in the draft report does not reflect how the map showing different functional areas was derived. It is suggested that no map be published in the final document. A map reduced to A4 size can not reflect the areas accurately and this could lead to many controversial disputes and misunderstandings.

To point out the importance of the above-mentioned two points it could, for example be interpreted from the document and the map that a cable car

system could be constructed at Smitswinkel Bay since the area falls within a 'Leisure Zone'. This area belongs to a private individual and it would be very difficult to prevent such an individual from going ahead with developments should the document be put forward as it is currently presented.

4. The information upon which the schematic area map is based needs to be fleshed out, preferably at a meeting where all contributors of the information elucidate their reasons for their specific classifications. This could facilitate the circumscription of the criteria (mentioned in point two) and the set of rules upon which the different areas are classified.
5. There can be no lucid synthesis of collated information without the aid of computerized analyses. The information should therefore be put on a Geographic Information System (G15) which would allow for definite boundaries to be drawn between functional areas, based on all the relevant information (see also our comment under DATA MANAGEMENT {section 1 of this report}).
6. If the original brief was to highlight core conservation areas, it should be spelled out more explicitly that 'remote' and 'quiet areas' enjoy this status primarily because of this reason.
7. It is imperative that sufficient attention be given to the whole issue of the privately owned land within core conservation areas.
8. The overall impression is that all future development will have to be subjected to an environmental impact assessment. There should be some distinction between, for instance, the construction of a hiking trail in the Cape of Good Hope Reserve and the construction of a holiday resort along Chapman's Peak Drive. Clearly the above-mentioned scenarios would require different types of assessment.

(Dr DM Richardson; Acting Chairman NOT FORMAL MAC RESPONSE; CFPNE MAC SCIENTIFIC SUB-COMMITTEE)

1. Both reports make no mention of the relationship between the proposed masterplan and other levels of plans prepared under the ambit of the Physical Planning Act (125 of 1991) and the Land Use Planning Ordinance (15 of 1985). Clarity in respect of this relationship is considered necessary. Will the masterplan fall within the ambit of national, regional and metropolitan planning frameworks? In this regard it is suggested that alternative case studies be investigated such as the Lake District National Park in Britain. The Park's relationship with the Cumbria County Council and the Department of Environment merits careful valuation.
2. The reports refer to the need for Local Authorities to prepare a local plan, which is a comprehensive and detailed zoning plan, in consultation with and requiring the approval of the park authority. Do those areas of local authority jurisdiction falling within the proposed park boundaries fall under the ambit of the Land Use Planning Ordinance (15 of 1985)? If so, what are the relationships between the Park Authority, the Provincial Government and the Local Authorities and what are the procedural requirements?

3. The two years allowed for the preparation of the masterplan are considered to be inadequate. Although the statutory steps to be taken in the preparation of the masterplan have not been stipulated it is assumed that provision will be made for adequate public participation in the planning process which is extremely time consuming particularly in environmentally sensitive areas. It is perhaps more realistic to allow for a period of thirty months.
4. Categories of Functional Areas - Page 46: The four categories of functional area are acceptable with the possible exception of the transitional area. It may well prove necessary within the transitional areas to draw a distinction between established built up areas and those areas that interface directly with the other functional areas. The nature of the controls required and the extent of the delegation from the Park Authority could well differ within the 'transitional' area. This proposed distinction within the transitional area could well await and form part of the proposed study of the functional areas to establish their effectiveness.
5. Transitional Areas - Page 53: The proposal that Zoning Schemes for the 'transitional' areas be prepared by Local Authorities within one year of the formation of the Park Authority is not considered to be practical. A more realistic period of time would be 30 months as motivated in the case of the masterplan above. In addition if the revision of the Zoning Schemes are to be in conformity with the masterplan then they should not be finalised until such time as the masterplan is approved. Zoning Schemes already exist for the 'transitional' areas. As such it would be more appropriate to refer to the revision of Zoning Schemes.
6. Schematic Map in Figure 6 - Pages 52 and 53: It is considered important that the schematic map on Page 52 be presented in a more diagrammatic form. This will avoid creating the impression of being accurate as well as avoiding the creation of false expectations that may not be realised. It would appear that in the compilation of the map too much emphasis has been placed on existing development. Of particular concern are the proposed 'leisure' areas along the major routes (eg. Plateau Road). These should not be shown at this stage but rather await the more detailed investigation.

It is suggested that the marine line around Karbonkelberg be changed from 'Quiet' to 'Remote'.

7. Summary Descriptions of the Four Types of Functional Areas - Pages 47 to 51:

Reasons for Classification: Remote Area - Page 48 Movement corridor requires explanation. Is it an important corridor for biotic movement?

Reasons for Classification: Leisure Area - Page 48 The Statement In separate low leisure (no overnighing) or in high leisure (basic overnighing)' is not consistent with envisaged facilities such as chalets and restaurants.

Development Rights: Transitional Area - Page 49 The requirement that development rights may only be exercised subject to an environmental impact assessment is not considered to be realistic or practical in respect of the existing built-up areas within the 'transitional' area. This matter is discussed in further detail above (Item 4.5.5).

Envisaged Recreation and Tourism Activities: Quiet Area - Page 50 Other than diving, other water related activities need to be added such as fishing, surfing and other craft sports related to water.

- **Envisaged Facilities: Leisure Area - Page 51** Cableway companies should be replaced with Tourist Transit Facilities.

(Mr C Sullivan; Chief Executive Officer; WCITSC)

But... In table 1 (p.50) is it necessary to include under Transitional Area, the items Agriculture and Forestry when they are already mentioned in the sentence 'Activities permitted include....'? First sentence of second paragraph on p.53 might read better: 'include in their structure plans, provisions to minimise risks to developed areas such as fire, storms, floods and land subsidence.'

(II Taylor)

1. **Beaches that fall within Transitional Areas could be marked as Leisure Areas, eg. Muizenberg, St James, Fish Hoek, Simon's Town and Flout Bay. This is motivated by the fact that management objectives for beaches are consistent with those outlined for leisure areas.**
2. **Marine reserves in the Cape Peninsula could be specified on the map. These areas are accessible to the public but there are restrictions on the harvesting of intertidal resources. A list of the marine reserves in the Peninsula is attached.**
3. **There should be recognition of a likely future increase in demand for leisure areas, associated with improving public transport systems which will facilitate access to the Peninsula for Cape Flats' residents. In addition, socio-economic upliftment of disadvantaged communities in the Cape Metropolitan Area may contribute to increasing leisure time and increasing demand for leisure facilities.**

*(ASSISTANT DIRECTOR EMVIROJYME/ITAL MANAGEMENT; for Director General;
DEPARTMENT OF ENVIRONMENT AFFAIRS)*

The time limit of two years appears excessive as a large amount of the work in deciding functional areas has been done.

p.48 Leisure Area - 'resilient and disturbed terrain' - I presume you mean resilient or disturbed areas. How does one define resilient? Very few areas are resilient to urban development or other human activities. Areas disturbed by alien vegetation encroachment could be rehabilitated, yet other areas may not be possible to rehabilitate.

Transitional Area: 'Activities which could negatively affect the value of the CP could be extended'. What exactly does this mean? From which viewpoint does one give a value to the CP, the developers, the miners, the environmentalists, the tourists or the authorities?

p.49 Remote & Quiet Area - type of Habitat should include: Renosterveld, Beaches, etc..

(P Ivey)

Fig 6 p52: False Bay Coast: Less of these coasts should be 'transitional', rather low leisure or quiet, i.e. all Simon's Town Coast South of and including Seaforth Beach and

Simon's Town Coast North of Marine Oil Refiners up to and including the existing marine reserve between Elsie's Point and Jager Walk (Fish Hoek). At least 50% of Fish Hoek Beach to be left natural i.e. no more impact on the dunes, no more removal of seaweed. 'Utility' sites will need very close monitoring.

(Mr D Stechman)

The categories and elements need a comprehensive investigation to establish whether they are appropriate or all inclusive e.g. another (site specific) category should be 'Rehabilitation Sites'. Congratulations on including a map, but perhaps at this level, the final document should rather omit.

(Mr JE Avis)

Categories are too broad and also unclear in fig 6.

(Dr J Gardner; Chairman; CAPE WETLANDS TRUST)

Recommendations excellent, but proposed names for 4 types of 'functional areas' a bit strange/not appropriate; why not link up with established terms such as WILDERNESS, NATURAL, RECREATIONAL and DEVELOPMENT AREAS? 'Transitional' sounds meaningless - and imagine putting up a visitors' notice 'You are entering Cape Point/Signal Hill Quiet Area' Going for the unique/new names sounds fine but rather pointless and self-defeating if it means ignoring an established/common parlance and saddling the public with unknown terms lacking 'punch' and more likely to give rise to hilarity than to be instantly recognizable and thus to be taken seriously/accepted.

In Table 1 (p. 50 - 'Envisaged Recreation and Tourism activities') no mention made of ANGLING: Surely not to be excluded from Remote/Wilderness and Quiet/Natural Areas?

(Mr K van Juysssteem; Representative; UNIVERSITY OF STELLENBOSCH - GEOGRAPHY DEPARTMENT)

This seems to me a very useful way of structure planning (both in the thinking and in the physical sense) in this area.

(Ms D Salters)

It is not (yet) clear to me why either the new Province or a Metropolitan Authority would not - quite naturally - take over such a function - especially where authority, funding, staffing are critical issues.

(Mr WI! Thomas)

Not adequate powers nor funding.

(Mr N Malherbe)

Change last sentence to read... 'No single public authority SHOULD obtain the full support of all...'

(Dr D Sleight)

Depending on the 'legal teeth' and sufficient funding for effective management of the assets.

(Mr C Adams)

The principles and proposals are worthy of support but the following matters need to be clarified:-

- (a) It is regarded as a weakness to put the whole of the proposed Cape Peninsula Heritage area as shown on Figure 2 of Volume 1, under the control of a single authority.
- (b) The control over all State land is a cause for concern, especially in view of the fact that a major proportion of Simon's Town is non-private land.
- (c) The issue of ownership and how re-allocation would be achieved needs to be resolved.
- (d) Simon's Town Council confirms its willingness to relinquish control only for the purposes of management of the natural environment.
- (e) Should control over the management of the natural environment be relinquished who would be funding functions such as eradication of alien vegetation and making fire breaks?
- (f) the relationship between the 'custodian' and local authority needs to be resolved.
- (g) The proposals do not address the fragmented authority for False Bay.
(Mr JB Marais; Town Clerk; SIMON'S TOWN MUNICIPALITY)

What is meant by a public authority?

(Mr ND Geldenhuys; Executive Director; Southern Parks; NATIONAL PARKS BOARD)

I am not convinced that the last sentence is valid. If these authorities are responsible to their publics and if this proposal to create a single executive authority is accepted as desirable by the public then I think it highly likely that, in a democratic society, they will give 'their full support' to a single public authority. I maintain that the most appropriate single public authority that exists in South Africa is the National Parks Board. I believe that the possibility of this authority taking over the statutory authority for the Cape Peninsula needs to be more exhaustively analysed (however I have only read Vol 1 of the Report).

(Dr JAW MacDonald; Representative; SOUTHERN AFRICAN HERITAGE FOUNDATION)

It is true that no single public authority would obtain the full support of all stakeholders. Comments implementation has been a disaster and there have been no real policies to implement.

(Mr JPI Fudge)

Different local authorities have different areas of interest. The Growth Management and Development Plan for Constantia/Tokai clearly illustrates a conservation bias which supports the basic policy of the document. The question of powers and functions is amplified in the covering letter.

(CHIEF EXECUTIVE OFFICER; LOCAL COUNCIL OF CONSTANTIA VALLEY)

There is uncertainty at the level at which the Authority will be pitched. Reference is made to an Act of Parliament, also acceptance of the report by the Premier of the region at present. There is no authority that has sole authority. It is probable that until finality is gained as to who will be responsible, the report could be in limbo. Is there current legislation under which input would be implemented in the present or revised form ?

(Alhitelaw; Representative; CAPE BIRD CLUB)

EXCEPT the word existing should be inserted between the words no and 'single' on the 7th line.

(Messrs J Levy and L Coelen; REPRESENTATIVES; MOUNTAIN CLUB OF SOUTH AFRICA)

I am of the opinion that CPA Nature and Environmental Conservation would obtain the full support of all stakeholders.

(Mr JA van Wyk. Regional Representative; DEPARTMENT OF PUBLIC WORKS)

Cape Nature Conservation have the expertise in conservation and are an indispensable part of a management authority.

(P Salter; Representative; SIMON'S TOWN FLORA CONSERVATION GROUP)

The last sentence - I do not agree:

If the CPIIA is to be managed properly, then a single public authority must be established, and through negotiation gain full support. It can be done with patience and care. The proposed CPHA Authority can and must do this.

(Mr W van Wannelo)

The relationship, structurally, functionally, of the proposed authority is critical, particularly in its composition, accountability, funding, effectiveness.

(Mr H Gold)

Valid but insufficient:

CNC's primary interest is conservation and interpretation, which makes it a indispensable component of the managing authority.

(THE CHAIRPERSON OF RLCG; ; REDHILL LANDOWNERS CONSERVATION GROUP)

The track record of the existing authority seems to confirm this conclusion.

(Ms GM Russell)

1. Provision must be made for some pyramid of authority. The environmental authority must not have total veto over the other authorities, eg. flood control.
2. p54 ('Existing public authorities in implementing the proposed policy.) Whilst this statement is viewed as a partly valid comment, the report has not proven conclusively that the existing public authorities have displayed either a lack of commitment to, or allocated insufficient funds for the maintenance and enhancement of the areas under their relevant domains. Credit for this should at least be given. It is, however, accepted that in the foreseeable future such public authorities will be under considerable pressure to give greater priority to the basic infrastructural needs of the broader community.
3. It is debatable whether current legislation for regulating development activities which impact on the CPPNE has in itself proved ineffective (Section 1: page 14, paragraph 3). What is lacking rather, are appropriate management structures and explicit policy to achieve the goals outlined in the report. The same comments apply to the conclusion concerning jurisdictional boundaries (Section 4.4.1: page 42).

(CITY OF CAPE TOWN; CITY PLANNER)

Rationalisation of management proposed by the Kahn Commission suggests that two authorities might be possible if each had a designated area of authority - CCC north and WCRSC south could be acceptable. It is important that a single authority be in charge of the Cape Peninsula Area but the question of ownership and implementation of a single management plan a number of govt. authorities will be difficult. If all state land was managed, even owned by a single authority, it would be the best solution. This issue is complex but needs to be attempted.

(P Ivey)

1st section - add resources to powers

2nd section - what about metropolitan government operating with new primary authorities?

(Mr JE Avis)

MOTIVATION CONCERNING FUNCTIONS AND POWERS

More attention should be paid to the necessity for a coordinated public transportation system.

(Mrs J Welsh; Public Relations Manager; GOLDEIY ARROW BUS SERVICES)

Must have adequate funding to implement its task.

(Mr IY Malherbe)

Needs to have the balance of economics included. What does it cost and how is it to be funded.

(Mr CB Mitchell)

To enable the authorities to implement a sustainable and professional plan they must have sufficient power to generate funds on an ongoing basis.

(Mr C Adams)

Excellent.

(Mr B Hopfer)

The idea of an interim heritage area/authority should perhaps be introduced: In the meantime, the need for effective management and control within the existing CPPNE Area is so urgent that serious thought should perhaps be given to strategising the recommendations by firstly setting up an Interim Heritage Area Authority to take over full administrative management and control only of the existing CPPNE area - plus minor required investigations and negotiations to extend its control over the full Heritage Area as currently proposed.

(Mr M Callaghan)

- (1) In part 2 of the criteria on p56 I would like to see the additional principles I have put forward earlier in my comments on Section 3 included again.
- (2) In the final motivation on p57, I am not convinced that the National Parks Act does not adequately meet these criteria.

Such an authority must have HIGH PUBLIC PROFILE and must have TEETH! It must be staffed by active, dynamic, influential people. It must have access to the latest communication technology, and must be seen to be active and EFFECTIVE. It must not become a place that is 'opaque and where people can bury themselves in their own private research. EXCELLENT PUBLIC RELATIONS must be maintained.

(Ms S Howes)

Municipal thinking is that the current owners have an inherent right to rezoning, an inherent right to make a profit out of a speculative investment. (It would enhance the towns grading and therefore officials enrolments).

I do not believe that an inherent right to rezoning exists. It would seem that despite changed and evolving perceptions of the environment we are shackled by the attitudes

prevailing from the Rinderpest and some few will be allowed to make substantial profits of development recognised inimical to South Africa and indeed the world. That is surely unacceptable.

(Mr TF MAIM Representative; FISH ITOEI C ALIEN VEGETATION CONTROL GROUP)

There is uncertainty at the level at which the Authority will be pitched. Reference is made to an Act of Parliament, also acceptance of the report by the Premier of the region at present. There is no authority that has sole authority.

It is probable that until finality is gained as to who will be responsible, the report could be in limbo. Is there current legislation under which input would be implemented in the present or revised form.

(Whitelaw; Representative; CAPE BIRD CLUB)

1. Emphasis should be placed on conserving most of the +/- 130,000 Ha of land within existing PNE.
2. Set aside say 1% of this for high volume tourism to generate income.
3. The mere formation of a section 21 company will not solve any problems without the cooperation of the majority of affected parties.
4. Private Landowners are scarcely mentioned in your report.

(Mr EJ van der fforst)

'The situation has militated against one authority successfully fulfilling a custodianship...'. In view of my previous note, the term 'possibly' could be inserted in this sentence.

(Mr JA van Wylk; Regional Representative; DEPARTMENT OF PUBLIC WORKS)

As long as authorities are correctly or properly informed **on** environmental influences affecting their decision.

(Mr L de Waal)

Composition of Authority must be more clearly spelled out - i.e. what departments., what private and community sectors.

(F Salter; Representative; SIMOIY'S TOWN FLORA CONSERVATION GROUP)

We need a structure that can be set up soon - not a body that takes years to get going.

(Mr ff Gold)

Criteria central to selecting an authority as stated in the motivation fails to mention the 'criteria applicable to management authority/ies for CPPNE' as stated in the Kahn Report, which we believe is essential if the CPPNE or CPHA is to be managed efficiently and successfully. The Cape Peninsula Heritage Authority should also at the very least include the Peninsula Mountain Forum and major private landowner and resident associations. Tom Keane's passionate declaration (p. 13.77) is relevant here: 'The powers to protect the environment must be entrenched in the constitution of a federal government and devolved to metropolitan level, so that the will of the community cannot be thwarted by officials removed from, insensitive to, and uncaring about, the deeply felt needs and wishes of the public'.

The motivation also misrepresents some facts, for instance Scarborough Local Council has not had any authority or function in the CPPNE. Also the WCRSC has been the authority in the largest part of the Southern CPPNE and could have produced effective and efficient management in, for example, 'control of wild fires' and 'the use of the fire as a management tool'. Its planning could also have been sounder.

(THE CHAIRPERSON OF RLCG; REDHILL LANDOWNERS CONSERVATION GROUP)

- 1. This section is extremely difficult to comment on. The following are, however, comments made by field managers in the Cape Peninsula. The proposal creates a new administrative structure which will take considerable time and effort to establish. It is a very long term solution. There will have to be many interim stages (such as is happening with the current changes in National Government) before reaching the final goal. The complications of negotiating with existing landowners, authorities, trade unions, the uncertainties of job retention will all require considerable skill, time, money and unlimited drive to resolve. How will we get there?**

WHAT WE NEED IS A ROAD MAP, CAR AND A DRIVER PLUS FUEL.

The Consultants should strongly recommend to the Western Cape Premier how they would see their dream being realised - or else it will gather dust.

- 2. p55 (Many of the Consequently, the authorities concerned) Viewed as partly adequate, however, the assumption that economies of scale have not been possible is hardly capable of being levied at large organisations such as the R.S.C., the C.P.A. and the City Council.**
- 3. There is a noticeable absence of comment on potential DISECONOMIES of scale which should perhaps be more appropriately described as DUPLICATION of resources especially staff, equipment and premises which occur from the establishment of a further 'ad hoc' body. The existing public authorities can at least claim multiple use and spread of areas of operation for much of their resources. Under the circumstances a cautionary note to the above effect should be included.**

(CITY OF CAPE TOWN CITY PLANNING DEPARTMENT)

Need and Desirability Analysis (Page 24)

In terms of current planning legislation applicable to the study area, namely the Land Use Planning Ordinance (No.15 of 1985) the consideration of need in the assessment of development applications is specifically excluded. Assessment is based solely on desirability.

It is however accepted that it may well be necessary to include the assessment of need in respect of development applications located within this area of outstanding natural beauty.

(Mr C Sullivan; Chief Executive Officer; WCRSC)

Section does not address the question of ownership sufficiently. Certain authorities could lease land that is managed as a nature/conservation area but the authority managing the area should have ownership thereof. Although the Kahn Commission does address this, often land is either assigned, allocated or re-allocated rather than ownership changing.

(F Ivey)

Page 57 part 5: 4th item - 'discretionary' - I fear this can lead to abuse e.g. an individual or developer getting more favourable treatment through having the 'right connections'.

(Mr D Stechman)

No exploration of Metropolitan government

(Mr JE Avis)

RECOMMENDATIONS CONCERNING Furicnorts AND LOWERS

Name of authority should be °C.P. Park Authority, not ° - Heritage Area Authority' as suggested in question.

(Mr L Jooste)

Let's hope this Authority will have real authority!

(Mr W Mcfwan; Chairman; LAKESIDE/MUIZEIYEERG RATEPAYERS ASSOCIATION)

Too vague as to what it can/should really do.

(Mr Wli Thomas)

1. By Provincial legislation of Cape Government (remembering perhaps World Heritage Site - National Requirements)

Utilise and expand current administering infrastructure instead of total 'NEW' untried administration. Wealth of knowledge!

(Mr N Malherbe)

The report as a whole appears to be comprehensive and adequate and these comments are confined to a paragraph 4.6.3 which concern authority and powers.

The institution of a single statutory body to act as custodian for the area is a desirable and vital step. However, the chapter is vague on its powers. In particular our view is that it is vital that the body have the power to set and implement a regional structure plan (a la Adirondack Park) It should have the power to approve and/or veto developments which are proposed by the local authorities within the area. For example, it would be able to override the Simon's Town local authority regarding the approval of the proposal to construct a hotel at Redhill. This is central to many of the planning and development proposals in the peninsula area. However this proposal has ramifications for existing laws e.g. Land Use Planning Ordinance (Cape) (LUPO).

Secondly, the report does not adequately canvas the policy ramifications of the area falling under the National Parks Board (the legal aspects have been reviewed). The area is, and is punted to be, a national asset with the whole of the motivation to give the area an international status, for example a Worls Heriatge Site. The administering authority should accordingly logically be a national body such as the National Parks Board. The Western Cape does not historically have a record of an assertive and effective conservation body. It is submitted that the Job would be better done by a national authority.

In addition, the National Parks Board has the administrative infrastructure in place to raise funds and carry out other functions. Historically it has been criticised for being establishment orientated, but recently it has changed this image dramatically by consulting and getting involved with community issues.

It is thus submitted that while a single statutory body is laudable, the National Parks Board could adequately fulfil the objectives underlying this proposal under the National Parks Act and its existing infrastructure.

(Mr J Glazewald)

Generally a strong aspect of the report.

(Mr B Oberholzer)

Allow for diversity.

(Dr D Sleigh)

Economics to be included.

PROPERTIES IN ABUTTING AREAS:

While recognising the need for some form of control, this should be done via existing control measures within local authorities. We don't want another level of scrutiny and approval and time-wasting endeavours.

(Mr CB Mitchell)

National funding is required to protect our natural heritage and funds invested in appropriate regional and metropolitan authorities. Create a new operating structure (retain present aspects which are of use) to meet new proposed responsibilities.

(Mr C Adams)

General Question:

What happens to the people who are presently undertaking this function/part of this function?

(Mr R Hunt)

The assumptions regarding powers and functions are perhaps not imaginatively (or realistically) enough thought about. It seems that your notions of how government actually works are a little idealistic/hopeful. As a result your proposals are simplistic (and, I'm afraid doomed to fail dismally). A little imagination about co-ordination and recognition of the difficulties of communication between (many) authorities could perhaps lead in a fruitful direction.

(Mr S Townsend; member; CAPE INSTITUTE OF ARCHITECTS)

(We are not qualified to comment on legal aspects). The functioning of the Board of Trustees, Liaison Committees etc. seems sketchy. Public accountability is not clear. What 'teeth' will the Liaison Committee have? How will it be constituted

(Ms IV Thesen; Chairman; FRIENDS OF THE CAPE OF GOOD HOPE NATURE RESERVE)

1. Alternative existing controlling authorities are not mentioned or considered.
2. It is unrealistic to propose yet another authority to be formed given the existing large number of authorities and fragmented control in environmental matters.
3. The National Parks Board already have the structural, organisational, legislative and financial independence needed for the recommended authority, as well as the liaison mechanisms to include all relevant parties.

(Mr ND Geldenhuys; Executive Director: Southern Parks; NATIONAL PARKS BOARD)

How are the existing controlling authorities affected? Is the new authority a 'super' authority or will it replace existing authorities in certain areas e.g. the Western Cape Regional Services Council. Note: I have not yet read Appendix 8.

(Mr B Kopfer)

I support the recommendation that the management of the CPHA should be an Act of Parliament. I support the idea that there should be a public hearing of all people nominated for the Board of Trustees of the CPHA, similar to the SABC.

(Mr All Fourie)

We think that you are to be commended on a fine Draft Policy document which leaves little room for criticism. The recommendations on page 58/59 have some similarity to the structure of the British National Trust, long held in regard by the British.

As a group concerned with the mountains and activities related thereto, we see as fundamental to the long-term wellbeing of our mountain chain the creation of an independent Authority charged with overall responsibility for this. We are convinced that there is no satisfactory alternative.

(Mr J Hale; Representative; SWARTKLIP A1JEN VBOETATIO1Y ERADICATORS)

Recommend that the criteria be set to ensure that the Board appointed to implement the report must consist of those with the necessary skills and from those who represent the public.

The intentions regarding Section 21 Articles should be clearly spelled out as the Companies Act had not been drawn up with environmental matters in mind.

The mechanism for the purchase of private land for incorporation into the reserve had not been addressed.

(The Secretary; ; TABLE MOUITYA1Y AND SILVBRMINE NRAB)

The idea of an interim heritage area/authority should perhaps be introduced - as enlarged upon in the comments in Part B no 5.

(Mr PI Callaghan)

Appointments to the board of Executives should be made after public hearings. Appointments to the Liaison Committee should be made by an equitable formula after nominations by the majority of the body concerned being present.

(Mr D Wheeler)

I am not sure whether there is any real likelihood of such a new statutory authority being created. At least within a realistic short time period. I fear this recommendation to create a totally new statutory authority might end up consigning the Cape Peninsula to another decade plus of the currently unsatisfactory STATUS QUO. However, my recommendation for the additional 'primary recommendation' in Section 3 is that we go for a National Park.

(Dr LAW MacDonald; Representative; SOUTHERY AFRICAN NATURE FOUNDATIO1Y)

I acknowledge the desirability of having ONE controlling body. My fear is that it may end up having TOO much power and autonomous control. Input/assistance/control by educators?

(Ms S Howes)

'Enhance nature-orientated multipurpose' - very long winded and unclear - what about 'holistic' use of the area or 'sustainable multipurpose' use of the area.

(Ms C Burgess)

Appropriate - subject to adequate funding and status. Given that the CPHA has public support, sufficient funding and professional credibility it is fine. The process must ensure that the status of the Executive body is entrenched at a national level and representative of scientific, planning and general public.

(INSTITUTE OF LANDSCAPE ARCHITECTS)

The establishment of the above-mentioned authority would certainly play a vital role to promote enhanced nature-orientated multi-purpose use of the area. But the role they are going to play and the level at which they are going to work should be carefully looked at. Aspects that must be looked at are:

- duplication
- the role of the RSC and local authorities
- at what level applications for development are going to be looked at.

(Ms P van der Spay; Representative; SOUTH AFRICAN TOURISM BOARD)

We have been unable to discuss the Draft Policy for Multipurpose Use of the Cape Peninsula at an ANC National Task Group meeting before 3 June 1994. I would therefore like to emphasise that these comments are made in my personal capacity. Having been involved in co-ordinating the ANC Policy on Nature Conservation, I believe (regrettably) that nature conservation will enjoy a low priority over the next five years. My comments should therefore be seen within the broader political context of a changing South Africa. Tourists visiting the Cape Peninsula spend their money on hotels, restaurants, shops and on transport. Very little money is spent within the natural areas which could be used for conservation. Even if a tourist levy can raise substantial funds, it could be argued that such a levy should be spent on upgrading 'unsightly squatter camps', since squatter camps on the road to the airport probably has the biggest negative impact on tourism. Most tourists do not even know what alien vegetation looks like, so spending a tourism levy on invasive alien plants will have little beneficial impact on tourism.

The Amended Section 126 of the Constitution that defines the legislative competence of the Provinces, includes under Schedule 6: Housing, Education, Health Services, Welfare Services, Urban and Rural Development, Agriculture, Soil Conservation, etc. At provincial level, nature conservation will have to compete for funding with virtually all the most pressing socio-economic issues. Given the political realities I believe it is unlikely that nature conservation will enjoy a high priority for funding at local and provincial level.

Even at national level, I believe that restructuring the National Parks Board will not be the highest priority within the Reconstruction and Development Programme. It is unlikely that the national parliament would give a high priority to creating yet another statutory authority, especially if this would create a whole range of new statutory authorities for St. Lucia, Knysna etc. After all, this what the National Parks Board has been created for in the first place. The national parliament is not going to debate on how much money should be allocated to each of these competing statutory authorities. Whatever budget is allocated for nature conservation at

national level will be allocated to the National Parks Board, who will in turn allocate funds to the various National Parks.

In terms of competing for funding at national level, the National Parks Board would be able to make the strongest case, since the network of National Parks form the backbone of our tourism industry. Since tourism is one of the fastest growing industries and may well become the largest earner of foreign exchange, a strong case can be made for expanding the network of National Parks, which can be promoted internationally as a single package. The National Parks Board is also in a stronger position to raise funding from international sources.

It should further be noted that criticism of the management of National Parks may not apply to a new restructured National Parks Board. The ANC Policy on Nature Conservation proposes that National Parks should have Community Liaison Committees to allow for local public participation. National Parks will therefore become much more accountable to the public. Everything proposed in the Draft Policy for the Multipurpose use of the Cape Peninsula would in principle be possible under a new restructured National Parks Board.

It would also be more cost-effective to use an existing organisation than to set up an additional conservation body which would involve duplication of expenses such as offices, administrative staff, office equipment etc. Given the limited funding available for conservation, unnecessary duplication simply cannot be afforded.

I would therefore propose that the Cape Peninsula Management Area should be declared a National Park to be managed by a new restructured National Parks Board. Provision can be made in a Contractual National Park agreement that the National Parks Board should undertake to manage the Cape Peninsula Management Area in accordance with the recommendations of the Draft Policy for the Multipurpose use of the Cape Peninsula.

(Mr L Liebenberg)

These broad policies have implications for the Local Council in three areas and the implication themselves have not been clearly spelt out. In addition it must be pointed out that the document and its proposals would appear to *have* been produced without reference to the changing local government scenario: metropolitan government and fewer, more representative municipalities, thus reducing the existing multiplicity of local government structures. It is worth noting that the Draft Policy For Multipurpose Use of the Cape Peninsula; Kahn Working Group Interim Report also appears to ignore proposed change to local and metropolitan government.

1. JURISDICTION

The document proposes that an area larger than the present CPPNE be formed. This area known as the Cape Peninsula Heritage Area would fall under the custodianship of the Cape Peninsula Heritage Area and would include large portions of the Constantia Valley adjacent to the present CPPNE boundary, as well as the river corridors. The plan in the document is very vague but would appear to include at least all the farmland and adjacent urban areas. The plan does not show the river corridors but these are recommended in the text to be included. In short then, the statutory body would exercise certain control over part of the Local Area.

2. CONTROL

The authors of the report state that existing public authorities have primary interests other than protecting the Heritage Area. As such they propose that 'the authority must ... have the legal power - discretionary and regulatory - to control activities in the Cape Peninsula.'. In this regard it is recommended in the report that the authority 'should be empowered with legal competence to regulate the activities of land owners and management agencies in the Cape Peninsula Heritage Area in accordance with accepted policy. Nowhere in the document is the nature of the control spelt out or the procedural implications explored. The only reference to the nature of control that is stated in the report is:

'Proposed changes to the use and the management of land, water and airspace in public and private areas of the Cape Peninsula Heritage Area which contravene policies arising from this report should be subject to environmental impact assessments, including a need and desirability analysis, as well as environmental management plans or contracts, and should meet the objectives of functional areas'.

3. FINANCE

It is proposed that the Heritage Area Authority be funded by central, provincial and local Government as well as the private sector.

The above three areas clearly have implications for the Local Council however, the nature of these implications are impossible to ascertain from the document. The jurisdiction boundary is very poorly defined however it clearly covers areas which have existing rights in terms of existing Zoning Schemes and it's difficult to imagine how they will reconcile these rights with the proposed policy to the degree that conflict exists.

At the same time, within the Heritage Area, certain controls are proposed. These controls fall under the Heritage Area Authority but firstly the controls are not defined and secondly the procedure for implementing these undefined controls is not spelt out. Clearly there would have to be a means of referring applications to the Authority but when this is done, given that the present procedure is controlled in terms of Ordinance 15 of 1985, it's again difficult to determine. Furthermore, once the Authority has resolved one way or the other, it is not defined how this resolution will fit in with the resolutions of local, metropolitan and regional government. Finally in terms of control exercised by the authority, it is proposed that applications which contravene the policies in the document should be subject to an CIA (which one assumes would then be scrutinized by the Authority). The problem is that the policies

are so broad that any application within the Heritage Area would have to provide an EIA and be referred to the Authority. ie. With the Heritage Area, total control will vest with the Heritage Area Authority to the detriment of the local authority. In addition no provision is made for an 'appeal' process, should conflict arise between a local authority and the Heritage Area Authority. The final area of impact is finance. It is not specified what funds should be made available and by whom, nor is it specified what will be provided from these funds eg as the Heritage Area is provided to include river courses, it would be assumed that the Authority will fund the maintenance and development of the river courses as proposed in the riverine study (assuming they accepted the proposals as spelt out in this study).

A number of the above questions are answered in Appendix B of the policy document. The Appendices were only available by UCT. In particular, Appendix 8 - Preliminary Assessment of Legal and Administrative Options for Managing the Use of the Cape Peninsula, has been examined and is commented on below.

4. LEGAL AND ADMINISTRATIVE

This section of the report explores the legal means of establishing an authority and vesting control and management aspects in this authority particularly over land which has existing real rights in terms of existing planning legislation.

This section begins with the following general recommendations:
'GENERAL RECOMMENDATIONS'

The general recommendation made in this report is that a defined area be governed by a dedicated Act/statue with a single management authority with total management responsibility for the area'.

In terms of this recommendations, existing South African legal instruments are examined.

These include:

The Environmental Conservation Act (Act 73 of 1989) The National Monuments Act (28 of 1969)

The National Parks Act (57 of 1976)

The Mountain Catchment Areas Act (Act 63 of 1970)

Cape Nature & Environmental Conservation Ordinance (19 of 1974)

The Paarl Mountain Act (87 of 1979)

The Lake Areas Development Act (39 of 1975)

The problem with all of the above in relation to the Cape Peninsula Heritage Area as proposed is that while each may be of use in part, none are of total use and most importantly all have problems with existing planing aspects and existing real rights for property.

The authorities then do a comparative analysis with the Adirondack Park: New York State, USA. This leads to the following recommendations:

1. All state land in the Cape Peninsula Heritage Area Park could be declared 'forever wild' along the lines of New York State Constitution.

2. A 'conservation and development plane (a Master plan) should be established for the 'area'. This Master plan should effectively freeze land use and ensure that all future development is subject to the approval of the Park Authority (PA).
3. The establishment of the equivalent of the Local Land Use Programmes (Local Authority Plans). This will entail the PA overseeing local authorities as regards local land-use.
4. An equivalent of an Authority ought to be established, namely a management structure. This is referred to as the Park Authority (PA). The PA must have specific powers to:
 - i. draw up and approve the conservation and development plan, approve amendments thereto.
 - ii. approve local authorities land-use programmes insofar as they are pertinent to the overall functions of the PA.
 - iii. override and control matters which currently fall under national and provincial government departments and which would in the future fall under their regional and other equivalents.

A central theme is that this wide and ambitious objective can only be achieved by passing a dedicated Cape Peninsula Heritage Area Act which has as its underlying tenants:

- i. all development control, managerial and conservation functions be placed under a single responsible, powerful statutory body (the Park Authority) with the necessary powers to guide, oversee, co-ordinate, supervise, and ultimately control all activity in the Park.
- ii. that a regional land use zoning plan and map (the Master plan) be drawn up under designated criteria which provides the basis for the future land use development and conservation. Such a Master plan should dovetail with existing zoning schemes, subdivision rights and other local authority plans.

Within the Master plan area, Local Authorities must produce Local Plans. The Local Plans will be subject to the approval of the Park Authority.

It is the Council's opinion that the Legal and Administrative proposal for the Heritage Area have the most far reaching and dramatic affects on the Local Council. The net result would appear to be yet another authority within the Council's area of jurisdiction (including parts of the Valley) within which all aspects of town planning control are vested. It is questionable whether an authority dealing with the Peninsula as a whole would adequately deal with the intricacies of a local application.

When the RSC and earlier the Divisional Council were the controlling authority for the valley, these intricacies were indeed often ignored.

The proposal envisages an independent statutory authority with local authorities playing only a minor role. This is unacceptable as it is felt that the Heritage Area is embedded within the urban matrix of the city.

As proposed the Board of Directors is not sufficiently representative of local government and therefore lacks accountability. Only elected representatives of municipalities afford the necessary accountability to their communities.

The Cape Metropolitan Council and a greatly reduced number of municipalities could provide planning and management for the Heritage Area in place of an Executive Office without creating costly additional and duplicated bureaucratic structures. (It is estimated that the proposed Executive Office alone could cost between R3 and R5 million per annum purely in salaries and other operating costs).

A suggested management structure is outlined below:

BODY: PRIMARY POWERS AND DUTIES

BOARD OF TRUSTEES

15 Members elected by the Trust to act as custodian for the natural and cultural resources of the Cape Peninsula Heritage Area; Government - one national, two regional (tourism and to balance local, regional and environment) national interests, and ensure consistency in the Metropolitan Government - one implementation of Policy representing the Cape Metropolitan Council; Local Government - four representing municipalities in which the Trust area lies; Non-Government - one each from business and industry landowners, environment and recreation organisations; Co-opted Members - three experts who can be co-opted onto the board

EXECUTIVE OFFICE

Chief Executive Officer to co-ordinate the preparation small team, maximum four of Master Plans and detailed persons; Management Plans by the Local Authorities for the functional areas. It should be a relatively simple and cost effective exercise to establish such a management structure from within the soon to be formed new municipalities. Municipalities should ensure that the required expertise is available and offered for the tasks at hand.

(CHIEF EXECUTIVE OFFICER LOCAL COUNCIL OF CONSTAPITLA VALLEY)

The concept of funding from 1st Tier bugs the hell out of me as we haven't a federal form of government. Somehow the arrangement must be proof against political/ecomonic `schweinere. I would be far happier if funding could come from 2nd and 3rd Tier and private enterprise.

(Mr TF MAIM Representative; FISH 110Elf ALIEN VECILTATIOY CONTROL GROUP)

1. The word 'area and Authority' should be deleted and subsituted by the word Trust. The word 'Authority' gives an impression of ownership and hence control by the government, whereas the word 'Trust' implies ownership/control for the benefit of the people - 'CUSTODIANSHIP%
2. We do not believe that enough research has been done to recommend the legal nature of the controlling body and therefore reference to a Section 21 company should be deleted.
3. There should be a set of criteria established by which the selection of persons nominated by the different stakeholders can be judged. The development of the criteria must include PUBLIC PARTICIPATION and appointments should be subject to PUBLIC SCRUTINY.

(Messrs J Levy and L Coelen; REPRESENTATIVE'S; MOUNTAIN CLUB OF SOUTH AFRICA)

The reason given by Price Waterhouse for the choice of a section 21 company, imply that other legal bodies are deficient in material aspects.

There are many precedents, not only in SA but in the world, available which could be used as the basis for drafting suitable legislation to enable the 'management authority' to carry out its task efficiently and effectively with all the necessary legal powers and protection required. If necessary various aspects of the Companies Act could be incorporated, particularly the aspects of 'limited liability'.

The time and effort involved in drawing up a properly defined and suitable legislation for the 'management authority' for the Cape Peninsula would be justified rather than trying to bludgeon existing legal instruments to cover purposes for which they were never intended.

An examination of the Great Constantia Act, No 58 of 1993 highlights a number of issues, set out below, which would have to be carefully considered and provided for.

Issue:

objects of the Company would have to be clearly defined

drawing up suitable Articles of Association

the method of selecting the Board of Directors and its representation of the 'stakeholders'

creation of 'Liaison' and 'Executive' structures

the powers, duties and responsibilities of the directors

who will be the shareholders of the company and how will they become shareholders

how will the company take possession of all 'non privately' owned land in the 'defined' area. If the company does not own the land, it will be necessary to clearly spell out its obligations, etc. relating to its management of the land. The non ownership of the land could, in the future, enable 'local authorities' to take back and use the land for other purposes for which it is deemed necessary.

The company will have to be given the necessary powers to enforce the compliance with its policy relating to land use.

These are but a few issues that need to be thoroughly investigated. I believe that a special task group should be established to investigate all options and produce the draft for discussion and finalisation.

The task group should involve people with skills/expertise in various fields that would have to be covered by the legislation.

(Mr L Coelen)

1. It is not clear that the CPHA have the authority to have the final say over any controversial issue. Custodian sounds akin to caretaker, and perhaps the

Government landlord still has the final say. eg mining issue - split powers/responsibilities.

2. The body (EXEC office) must as duties draft up and work within an Environmental Management System and have auditing/monitoring functions.
(Mr P Gray)

Custodian of Heritage Area only.
(Mr EJ van der Horst)

The Executive Office of the proposed CPIIA authority must have a strong community development arm to promote the IDCP principle and therefore community development projects, e.f. handcraft/curio projects even outside the proposed CPHA and even among the poorer communities in the Greater Cape Town area. It must be possible for these communities to link these community development projects directly to the CPHA authority.
(Messrs Lutsch, Coetzee, Cowan)

Will it be possible for WPPPA to have a representative on the Board of the CPHA authority?
(Mr J Stegmann; Trust Chairman; WPPPA TABLE MOUNTAIN BIKEPATH TRUST)

I would support that recommendations are made as to the criteria that should be satisfied when persons are considered for appointment to the envisaged BOARD OF TRUSTEES. In other words they should not just be nominees but persons with relevant qualifications or experience and with an interest in the preservation of the CPHA.
(Aft Starke)

Authority appears top heavy, too elaborate. We do not like 'contractual agreements' to execute management activities. A clear line of accountability between policy-making and implementation is essential. All personnel need to be trained in conservation matters. Suggest an elected management board or committee for formulating policy, management strategy, budgetting. Activities open to public scrutiny. Board should include representatives from Peninsula Mountain Forum, False Bay Forum, major private Landowner groups, Cape Nature Conservation - who would be responsible for executing activities and working with private landowners. Non-specialist work contracted out only under strict CNC supervision.
(P Salter; Representative; SIMON'S TOWN FLORA CONSERVATION GROUP)

How will they be appointed to ensure that no vested interests are promoted. Guidelines need to be stipulated for the constitution of the body. The use of section 21 company is not ideal and other alternatives need further investigation.
(Mr E Manus)

The implementation section does not draw attention to the potential use of existing authorities/institutions to act as agents in carrying out policy. This may create unnecessary resistance from such authorities/institutions who fear losing 'territory'.
(Mr J Fowkes)

This recommendation is well stated!
(Mr DJ McDonald)

Ensure no duplication of functions. This authority will have to be in very close liaison with the metro local govt. structure on issues of legal, financial, developmental nature. Powers and duties would have to be clearly defined in its constitution.

Ms 3 flustwick)

Who will CPHAA be accountable to? Powers, duties etc in relation to existing authorities, acts etc. needs clear definition. Relationships to proposed Metro Council needs to be addressed; critically/

(Mr IT Gold)

It is agreed that funding from central, provincial and local government sources should be guaranteed. Self-funding should be allowed, but the primary funding of a National Heritage Area should be the responsibility of national government. (Bed Levies for tourist and water levies for managing catchment areas are important funding sources). The Kahn Report's 'criteria applicable to managing authority is not given consideration in the recommendation of the UCT Report. Only a seriously drawn up - and seriously received recommendation of this kind will ensure that management is geared to sustainable utilization of the area. Unfortunately EEU's recommendations offer little hope of either improved or committed management on the ground - where policy either succeeds or fails. The proposed Authority is top heavy, too elaborate, and is almost certainly likely to be out of touch with what happens - and does not happen - from day to day. Management *activities* should not be executed by contractual agreement, a device open to endless buck passing - as we can testify. A clear line of accountability between policy-making and implementation is essential. All personnel need to be properly trained and educated in environmental conservation matters. We invite consideration of the following suggestions:

An elected Management Board/Committee that is responsible for formulating policy, management strategy and budgeting should be established, it will also have to be in close touch with day-today implementation, so that a culture that is contrary to its own environment and heritage values cannot develop among the rank and file of the work force. All its activities should be open to public scrutiny and the efficiency and effectiveness of work actually carried out should be subject to periodic public audits. Various methods of election should be investigated. One possibility is for various categories of interest groups (NCIOs) to elect a predetermined number of members. Candidates should be open to being questioned on their platform and their intentions. A mechanism for constituency-instigated disciplinary *action* should be set up.

One representative each from local, regional and national government could also serve on this board. This body could be an association not for gain and it would need to be a legal entity. All public land within the PNE must be places within the global custodianship of CNC&M, who will also be represented on the board and would be responsible for executing management activities (receiving all funding from the board for its activities in the CPHA) including working with private owners as under the Mountain Catchment Areas Act. Only specialist on conservation work should be contracted out - albeit under CNC personnel's supervision.

(Tiff CHAIRPERSON OF RLEG; REDHILL LANDOWNERS CONSERVATION GROUP)

It must be anticipated that there will be a power struggle between the existing CCC and WCRSC structures, both obviously key players. There may be major problems with accomodating current personnel. Where will the funds for salaries, admin. etc come from? What about the trade unions in CCC, already famous for resisting and blocking change in CCC structures like Parks/Forests, and recreational amenities?

Are there models of successful 'trusts' or management authorities that could be considered analagous elsewhere in South Africa, the Continent, or in the World? If so, could these models be useful in setting up the revised structures in the Cape Peninsula? It seems to us that the Cape Peninsula has always been managed on a reactive basis. A new management body would be expected to be pro-active - i.e. dealing with situations before they become problems or conflicts.

(Ms OM Russell)

On the question of the area of jurisdiction and the managing authorities, I do foresee some problems, however desirable your ideas may be.

I would prefer to see the area divided into two areas, 'A' and '13' with a joint executive custodian - 'Cape Peninsula Heritage Authority' - which determines overall policy for the management of the whole.

A 'Cape Peninsula Mountain Park':

LAND COMPOSITION: existing UTNE (extended in parts) and Marine Area adjacent to mountains.

OWNERSHIP: Land Heritage Trust - to take ownership over as short a period of time as possible.

MANAGING AUTHORITY: National Parks Board

B 'Cape Peninsula Heritage Area':

LAND COMPOSITION: Urban fringe, waterways in urban area, Robben Island, agricultural and un-developed areas adjacent to mountain but excluded from existing CPPNE.

OWNERSHIP: Mixed

MANAGING AUTORITY: Local Authorities

It is believed that this suggestion will promote the most rapid implementation of policy and not be held back by arguments over B. The Land Heritage Trust can acquire land from the owners in area B as time progresses.

I still believe that the National Parks Board represent the most effective and acceptable authority to manage the 'Mountain Park' - also because they are in place and it will take years to get a cohesive, effective, independent managing authority together.

(Dr F Blignaut; Representative; BLIGIYALIT AND ROPIKELAERE)

- 1. Who carries the political can for the CPHAA? Where does accountability lie?**
- 2. The composition of the CPHAA appears to be alarming, particularly the allocation of the various powers and duties to the different bodies. In the light of unclear lines of political accountability there would seem to be a risk of terminal inactivity, supplemented by duplication of functions. A critical question must be the appointment of the members of the Board. The post-April 27 restructuring of government at all levels will inevitably have implications for this process. There does not appear to be any attention paid to these issues in the report. Such an omission could prove fatal.**
- 3. What is meant by Masterplan? The connotations of this term are not necessarily encouraging. Does such a plan allow for the sort of flexibility required in land use decision-making that a fast-growing metropolis requires?**
- 4. While there is much merit in the idea of planning the built and natural area in a holistic way, the proposal to include the built environment abutting the CPPNE area in the Cape Peninsula Heritage Area (as per Fig 2) would not appear to be practical.**

It would appear that a more practical solution would be to declare a line between the built and natural environment and declare the natural environment to be the Heritage Area. At the same time, a technical committee could be established of representatives of the Heritage Area, Cape Town City Council and the WCRSC which could develop guidelines for developments on the edge or jointly review proposals for developments on the edge.

Further, by including the built environment as proposed in Fig 2, could jeopardise the proposal to declare the Cape Peninsula Heritage Area a World Heritage Site (see Justifications for Inclusion on the World Heritage List - Appendix 6)

- 5. Generally, this paragraph concentrates on the policy and planning aspects of a single statutory body; the execution of capital projects is more easily capable of being managed as external contracts supervised by the Authority's professional staff. The important, costly and more complex aspect of routine operational aspects are less clearly described. For this reason the classification 'partly adequate' is used.**

6. There seems little point in divorcing the policy planning aspects from the practical operational functions if the concept of a single statutory authority is to be seriously considered. In fact, it is potentially dangerous to separate the two in that policy decisions impact on operational costs and requirements. Much more clarity on this is required.
7. Equally, there seems little point in a new single authority concentrating on policy matters without having overall responsibility for financing its plans. To this end the report must be more specific in recommending from where the main source of funding should come. To assume loosely that the main funds will come from the State, regional and local government will result in either a play-off between the three or, more probably, the funding levels required will never be achieved. It would be better to recommend a specific main contributor with whom a procedure for communication is agreed in order to have greater certainty on funding levels. This may well be the Regional Government.
8. Local and higher government authorities already operate within the framework of existing legislation. The introduction of legislation overriding existing authorities can lead to confusion and degrade the role of such authorities e.g. the question to have a land based sewage purification works or a marine outfall can be adequately addressed under current legislation administered by all the authorities concerned. To have another authority with legal competence overriding a decision is not acceptable.
9. There is lack of objective evidence for extending the CPPNE into urban areas, which are subject to a series of other legislation, such as LUPO and Planning Schemes.

(FROM COVERING LETTER)...There seems to be a totally inadequate understanding of what authorities do, what functions they could be responsible for and what 'jurisdiction' means to those authorities, so we are concerned about: Desirability of proposed authority, its accountability and how it will work; Relationship to a future Metropolitan Council who may be better at controlling the urban fringe; How the authority will be established, and a timetable for this; Involvement of proposed authority only in POLICY PLANNING or TOTAL FUNCTIONAL MANAGEMENT - we think that playing the all-embracing overall planning role is probably most sensible since the practical experience and problems of routine operational management provide a much sounder base from which to conceptualise appropriate development and conservation plans (bearing in mind the above concerns)il Funding proposals for new authority are too general. The assumption that funding from all levels of government should be guaranteed (see para 4.6.3 page 58) ignores current pressures for funding by public sector. Recommend PROVINCIAL GOVERNMENT should be the prime source of funding. Levies etc. are likely to be competed for by many organisations associated with the tourist industry.

(FROM 'COMMENTS ON APPENDICES')

VOLUME 2: APPENDIX 8 - PRELIMINARY ASSESSMENT OF LEGAL AND ADMINISTRATIVE OPTIONS FOR MANAGING THE USE OF THE CAPE PENINSULA

Private landowners' rights include use and development rights granted under zoning schemes. These rights may not be taken away from their holders without the payment of compensation (section 19 of the Land Use Planning Ordinance, 15 of 1985).

These rights, together with the others suggested on page 8.5, obviously become an increasingly significant constraint when one looks at an area of land as extensive as the proposed Cape Peninsula Heritage Area.

A further point which should be made under the heading 'Constraints and Criteria' is the impact of section 28, the Property Clause', of the Constitution of the Republic of South Africa Act, 200 of 1993. This will certainly affect the capacity of a public body to control land use and development on privately-owned land but the precise nature and extent of its impact is currently unknown.

VOLUME 2 : APPENDIX 9

Part A of Appendix 9 page 9.4. The operational and accommodation expenses quoted seem very low.

In the conclusion on this section, the practical possibility of a new single statutory authority commencing initially with the capacity to plan, control, manage and finance the entire function is unlikely. Existing physical and human resources would need to be seconded, transferred, deployed etc. and the time-scale for success is likely to be lengthy. It may be advisable to recommend phasing the relevant functional responsibilities. The overall issue is likely to be the subject of debate at the Cape Metropolitan Negotiating Forum when the Report is finalised as it clearly impacts on local authority structures and responsibilities.

Part 13 of Appendix 9 page 9.7 'there is no reason to believe that the funds NECESSARY to manage '

This is an optimistic statement. The desires of a spending body are usually classified as necessities but are usually only viewed at from an affordability point of view by the funding source. A more appropriate phrase might be: "there is no reason to believe that a SATISFACTORY level of funding

Part C of Appendix 9 page 9.11

Charges against the rate base are likely to be more effective under a restructured local government in the Western Cape by targeting the proposed Metropolitan Council. This would be seen as more equitable in that the resource is broader and would reflect the overall breadth of opportunity to benefit from the Heritage Area.

Indirect and direct tourist levies do (see also Part A Appendix 9 page 9.5) offer a secondary source of revenue but claims against many of these sources will also be made by the Tourism Development Authorities (eg.Captour).
(CITY OF CAPE TOWN• CIT FLAIYIER)

Jurisdictional Authority - Page 8.54 and 8.55

It is not clear from the reports whether Local Authority boundaries will continue to cover the entire area under consideration (Vol 2 Part D P 8.54). The report states that the Park Authority should have primary legal responsibility for designated 'Remote', 'Quiet' and 'Leisure' functional areas as well as for 'Sites of Special Interest' and 'Utility

Sites' within these functional areas. It goes on to say that the authority should have jurisdiction over all activities in these areas.

Accordingly it would appear that the area of jurisdiction of Local Authorities would be restricted to the 'Transitional' functional areas.

It is important that the matter of jurisdictional boundaries is clarified as the implications could be significant particularly for the Park Authority. For example if certain areas do not fall under the jurisdiction of Local Authorities does this mean that the Park Authority would provide the normal Local Authority functions such as maintenance of utility services, refuse collection, scrutiny of building plans etc.? If this is the case then the impact on the resource requirements, particularly financial and manpower, of the Park Authority would be significant.

Powers and Duties - Page 8.57

Generally greater clarity between the roles of the Park Authority and those of the Local Authorities need to be presented. In addition some indication of the procedural aspects governing the relationship between the Park Authority and the Local Authorities should be presented.

In respect of the 'transitional' areas it is assumed that if spatial development plans and development applications are in conformity with the Park Authority policy, they need not be referred to the authority for approval. If this is the case will the Local Authorities concerned have the discretion to decide what conforms to policy and what does not? In cases that do not conform to policy the reports give no indication as to what the procedural requirements are.

Conflict Resolution Mechanism

There is no indication in the reports as to how conflicts or disputes between the Park Authority and Local Authorities as well as individual applicants are to be resolved. Provision should be made for an appeal procedure so as to avoid having to resort to the civil courts in order to resolve disputes. Such a procedure is not only time consuming but costly.

Delegation of Powers

Provision should be made in the proposed Act to enable the Board of Trustees to delegate their powers to both the Executive Office and to Local Authorities should they wish to do so.

The Body - page 8.57

Board of Trustees

Each Local Authority who has jurisdiction within the proposed Park Area should be entitled to have a representative on the Board. This would be in addition to a representative from the proposed Metropolitan Council. Accordingly the number of Board Members will have to be increased.

Executive Office

Until such time that there has been clarity in respect of jurisdictional boundaries, functions and duties of the park Authority it is not considered possible to determine the manpower requirements of the Executive Office.

Finance - Page 58

The report states that funding from central, provincial and local governments should be guaranteed. No indication is however given as to the basis on which these funds will be determined. Will it be by negotiation or will it be defined in the proposed Act? The report should clarify this matter.

Until such time as there has been clarity in respect of jurisdictional boundaries, functions and duties of the Park Authority it is extremely difficult to determine the financial requirements of the Park Authority.

(Mr C Sullivan; Chief Executive Officer; WCRSC)

A single authority controlling the entire Western Cape should be established. A branch of this authority should be entrusted with environmental matters. The only recommendation that ENSOC supports fully is that of a single authority.

(ENVIRONMENTALIST SOCIETY (ENSOC))

If a single authority such as National Botanical Institution, CCC, or RSC had sole control, ownership of remote, quiet, and leisure areas and a sufficient budget to run these areas surely one can do away with the establishment of another potentially hamstrung bureaucracy. The CCC, WCRSC, or CIIC&M are better placed to maintain the Cape Peninsula than some new authority. To control the Peninsula, one of these bodies needs :

- Authority,
- Finance,
- Further expertise,
- Staff infrastructure.

(F Ivey)

What greater Cape Town does need is for another "authority" to be established, especially on which could draw on a vast experience of local authorities/new metro authority. Most of the envisaged functions are essentially able to be provided by local authority and metropolitan authority, with exception of 'national' (or Provincial check status) legislation. Local franchise not explored. Adirondak Park structures, well explored, is not taken to its logical conclusion and no reasons given for this neglect.

(Mr JE Avis)

The authority's powers must override LUPO. Existing development rights must be overridden if in conflict with the proposed policy. Penalties for illegal development or activities should be increased dramatically. Funding from NOOs: unwise to specify names of organisations in your report. Too many opposing views on the Board of the Authority will lead to its collapse. The solution is to employ a strong business-minded individual to bridge differences eg David Jack, Jay Naidoo.

(Dr J Gardner; Chairman; CAFE WETLANDS TRUST)

The motivation and recommendation re authority functions and powers seem well thought through and - if implemented - point to a vastly improved administrative

superstructure for the purposes as specified. However, while we do not pretend to any expert or necessarily full knowledge of the issues at stake and/or of the legal possibilities, requirements and constraints involved, we would nevertheless hazard a **THREEFOLD SUGGESTION** for your consideration in this regard.

- (i) **The proposed 'Heritage-Area Authority' should in our view be A PART OF or A DEPARTMENT IN the new metropolitan-wide local authority, rather than being an independent statutory authority ('a separate legal peron') outside it (yet inside a part of its area of jurisdiction). The latter arrangement would seem to us to be setting the scene for endless squabbles re power and aims and development proposals between two such powerful but inevitably COMPETING authorities.**
- (ii) **Within the future metropolitan-wide local government the 'Heritage Area Authority' ('Department'?) should have the FINAL SAY on all development or planning proposals, land use decisions, etc. WITHIN THE AREA in question. All decisions and proposals of other departments in the metropolitan government which pertain to this area, as well as of the lower-level authorities within it, will thus be subject to approval by the 'Heritage Area Authority' (In the proposals as set out on pp 58 and 59 of the main report, it is not quite clear to us how the proposed independent authority will be able to exercise overriding powers with regard to the actions of lower-level local authorities within its (the (CPHAA's) area of jurisdiction).**
- (iii) **Linking up with earlier comments regarding the NAME for the area in question, there is a feeling amongst SOME in our Department that the area should be called 'The Cape Peninsula National Park' rather than the 'CP Heritage Area'. Whilst it is realised that a 'World Heritage Site:' in fact indicates a higher level of protection status than a (mere) national park, the fact of the matter is that the former term is not commonly known amongst the general public, politicians, local authority officials and laymen whom one wishes to persuade to support the idea of a special conservation zone, in the future Cape Metropolitan Authority area. As previously indicated, it seems likely that to many such persons the term 'Heritage Area' would have overtones of the battlefield and other human relics which are to be earmarked for preservation - or, alternatively, of an area where the general public is not really wanted. 'National Park', on the other hand, is an instantly recognised and widely accepted term with the principle focus on the protection of the NATURAL ENVIRONMENT for the enjoyment of the PUBLIC - which surely is the case here? Also - is there any reason why the area cannot be described (in promotional literature, etc.) as the 'Cape peninsula Park - a World Heritage Site'?**

As to getting the National Parks Board so far to lend its support - and hence the name - to such a plan, this will certainly call for innovative thinking and (presumably) special legislation to set a structure which is in fact a department (though of a special kind) of the future metropolitan government, but in which (amongst others) the National Parks Board will be involved - though merely as one party/interest group amongst many, none of which must be allowed to dominate (p 56).

(Pk If van Ifuyssteen; Representative; UNIVERSITY OP STELLENBOSCH - GEOGRAPHY DEFARTME1YT)

This is my main area of concern; I accept the need for a body which can take a broad view and has powers to act. I am unhappy about the Board of Trustees - Appointed by whom? Answerable to whom? I think the role of the 'Liaison Committee' is too weak and too peripheral. The whole thing could finish up as yet another top-down bureaucracy. More thought needed here.

(Ms D Salters)

IMPLICATIONS OF IMPLEMENTING THE RECOMMENDATIONS

Control over Government and particularly military and naval developments is required. We need a mechanism or structure to ensure better liaison with the SADF and other Government Departments.

(Mr PM Adams)

Why replace the current bureaucracy with another? The Board of trustees and the executive office are the only requirements. The liaison committee's function, as well as the private and public sector partners needs, should be met on the Board of Trustees. Operating agents function via the executive office.

(Mr Z Erasmus)

Valid, but pretty broad and probably over-ambitious.

(Mr WII Thomas)

1. The overlap with existing municipalities/local councils, particularly in the 'transitional' areas is still not clear.
2. The need for the new authority to not merely rely on subsidies (hand-outs) is important - it will be vulnerable to play to the tune of the agency providing the funding. It must therefore be to some extent self-sufficient - and able to justify its existence and size (number of staff) in economic terms.

(Mr B Oberholzer)

Concerned about the reference to Transitional areas control - the properties should be controlled by one authority only, and that is the local authority for the area.

(Mr CB Mitchell)

You seem to be creating more room for bureaucratic competitive conflict than ever - and at great cost.

(Mr S Townsend; member; CAPE INSTITUTE OF ARCHITECTS)

Valid for the long term but a short term strategy is possibly required to ensure immediate and effective management/control within the existing CPFT1E area - ideally adjusted to include undeveloped 'urban' areas in the UTNE e.g. South west of Simon's Town and the area South of Camps Bay.

(Mr M Callaghan)

While appreciating the broad value of the report, what isn't addressed is the question of access criteria/control regarding the functional areas. The fourth point takes up the 'framework, criteria and standards for management programme..', but access is fundamental to the area and deserves separate attention.

Under 'Achieve complete management.' it would be fair to add under '..improving the cost-effectiveness of the use of public funds..':
'-applying a graduated system of charges between and within the functional areas for the use of the areas'.

(Mr D Wheeler)

BUT only valid if (a) the single statutory authority does come into being (either the CPHA Authority or new Cape Peninsula National Park) and (b) if it does so rapidly.

Possibly the word 'facilitate' (line 4) should be replaced by 'ensure' - let us be confident that it will be an effective management system that is implemented by such an Authority.

(Dr IAW MacDonald; Representative; 'SOUTHERN AFRICAN NATURE FOUNDATION)

1. Facilitate protection of biodiversity - by EDUCATION
2. Enhance visual quality - get working groups of public involved -clean-ups; alien hacking etc.
3. Enhance public., vested interest:

- * as above (2.): see public are involved

- * Consider COMMUNITY SERVICE for infringements of CPIIA laws/codes of behaviour

- * Improving access yes, but some form of access CONTROL must be implemented.

(Ms 5 Howes)

Optimal use of water catchment potential is very important, especially in the river dune areas but also in other dune areas in the mountain catchment areas.

(Mr JM Fudge)

This only spells out part of the implications and again has not considered for example the issue of real property rights within the 'area', together with the issues covered in the attached letter.

(CHIEF EXECUTIVE OFFICER; ; LOCAL COUNCIL OF CONSTAITTIA VALLEY)

The lack of any reference to potential development nodes with relation to the CPPPIE makes it very difficult to implement. With all due respect the 'remote' is misleading and until areas for development are accommodated (which surely the increasing population will need), implementation will be difficult.

(Whitelaw; Representative; CAPE BIRD CLUB)

The changes to a number of the recommendations as set out in the previous pages would have to be amended etc.

(Messrs J Levy and L Coelen; REPRESENTATIVES; MOUNTAIN CLUB OF SOUTH AFRICA)

Criteria and standards for management programmes should be within a code of practice for management systems.

(Mr P Gray)

Add to the 2nd implication:

'Achieve competent management by..... biodiversity, AND CULTURAL RESOURCES'.

(Messrs Lutsch, Coetzee, Cowan)

We doubt that the currently recommended authority structure would lead to required levels of efficiency and speed of action. A more streamlined, mean, organisation is desirable.

(P Salter; Representative; SIMON'S TOWN FLORA CONSERVATION GROUP)

Additional implication is ability to raise funds outside the government structure to enhance the ability of the authority in execution of its task and to implement user-pays policies.

(Mr J Fowkes)

There is a need for a value system which respects established socio-cultural and socio-economic patterns.

(D Thomas)

The CPHA Authority's responsibilities/powers/functions and abilities to deal with other authorities and with private property owners must be investigated and made explicit.

(Ms S Hustwick)

CPHAA's powers/functions/responsibilities and capabilities to deal with both other authorities and private landowners must be explicitly defined.

(Mr fir Gold)

As can be seen we are sceptical whether the Report's recommendations will eventuate in effective management. The authority should be structured with greater emphasis on realistically attainable levels of efficiency, so that the philosophy and values of holistic planning and management of the natural terrestrial, coastal and marine environment and that of the urban edge can be realised.

(THE CHAIRPERSON OF RLCG; ; REDHILL LANDOWNERS CONSERVATION GROUP)

It is strongly recommended that the consultants include a recommendation to the Premier that he appoint a Commission to investigate and implement these proposals. If this document is given to the existing MAC or Nature Conservation the report will gather dust on the shelf.

- 1. The CPHAA's responsibilities/powers/functions and abilities to deal with both other authorities and with private property owners must be considered and spelled out at least in principle.**
- 2. The extended area does not necessarily provide any meaningful increase in the water catchment areas but otherwise the proposals to optimise water catchment potential are acceptable.**

(CITY OF CAPE TOWN• CITY PLANNER)

The area under consideration is mostly white-owned or occupied.

Therefore any recommendations affecting only those white areas should not be considered at all, or further developed.

(ENVIRONMENTALIST SOCIETY (ENSOC))

Would have liked to see the legal* and statutory implications spelt out very clearly in this section too. It should be quite clear that the authority has the power/status to sue and be sued in terms of implementation or non-implementation of the final agreed policies and sub-ordinate rules and regulations put in place to manage the area.

(CAPE PROVINCE MOUNTAIN CLUB)

But...

p.61, point 2 of paragraph 'Enhance the visual quality...': In "Transitional areas" I would strongly urge revising the 152m contour downwards to the existing upper limit of suburban development, especially in the case of the southern suburbs of Simon's Town (Froggy Farm - especially - and Murdock Valley), to ensure the inclusion of this 'grey area' in the Quiet Area (+1-300 - 500m in width?). It should be a candidate for special protection - e.g. in your scheme, a 'Site of Special Interest'.

(H Taylor)

The question of ownership needs to be more thoroughly addressed. Management and ownership should go together. I feel that it is imperative that all state land be consolidated under a single owner. The various departments should be approached to ensure this consolidation. The 152m contour has been a useful guideline in the past and can be used to prevent the gradual encroachment of transitional zone onto leisure/quiet/remote zones.

(P Ivey)

'Public has a vested ...' I believe some ratepayers/residents' organisations (and even some environmental committees) become swamped with people not interested in the natural environment and whose main interest is development and making money.

(Mr D Stechman)

Mechanism for implementation needs addressing.

What Greater Cape Town does not need is for another 'authority' to be established, especially one which could draw on a vast experience of local authorities/new metro authority. Most of the envisaged functions are essentially able to be provided by local authority and metropolitan authority, with exception of 'national' (or Provincial - check status) legislation. Local government franchise not explored. Adirondack Park structure, while explored, is not taken to its logical conclusion and no reasons given for this neglect.

(Mr JE Avis)

COMMENTS RECEIVED TOO LATE FOR INCLUSION IN THE DATA-BASE

**WILDLIFE SOCIETY, WESTERN CAPE BRANCH COMMENTS ON THE
DRAFT POLICY FOR MULTIPURPOSE USE OF THE CAPE
PENINSULA (represented by Andy (Tubb))**

- i. **Public Participation Process:** The process has been fairly good, given the number of I&APs, the size of the 'Public' and the dimensions of the task (time-scales, geographical extent, complexity of issues). However:
 - Categories of I&AF's separated.
 - Thus, category scoping had limited focus (windows).
Too much informing, too little participation.
Options somewhat limited?
Public participation staggered, not a continuum.
 - Public participation in final document? (Resubmit)
 - Public participation in next steps? i.e. policy framework to development of Management Plans.
 - Needed more public participation at the Social Sciences level throughout the project.
 - Possible more public participation at youth level.
Does the 'Team' feel that a) involvement outside workshops and public meetings was adequate? b) involvement of disadvantaged communities throughout the process was adequate?
More continuous media coverage.
 - Regular surveys of users in site.
 - A regular 'update' newsletter.
 - Regular fieldtrips (good areas, poor areas, problem areas).
2. **The Kahn Working Group Interim Report is very poor, Not much has been resolved. Even the natural split (social and environmental) between Southern and Northern Peninsula (with regard to interim control and management) has not been recognised. The report reflects power struggles between various authorities, especially the RSC and CCC. Neither have a good management track record. The principle of a single authority, a single policy and uniform management objectives has been lost.**
3. **Whatever 'Management Advisory Committee' comes into being, must be accountable, transparent and respected by all. It must be representative of the people and take cognizance of their needs. Members must not be 'fashionable' names but must be appointed by, and answerable to, a constituency. Members must be organisations, not individuals.**
4. **World Heritage Site Statue? Yes, but too soon. We must first get our act together.**
5. **The extended PIPE boundary an excellent ideal**
6. **Connection across Noordhoek -Fish Hoek Valley poor.**

7. Fundamental threats should include a) historical land rights b) economic (development) greed of the few affluent c) inefficient, unaccountable and irresponsible local authorities)poor decision-making).
8. Document lacks information on optimum carrying capacity.
9. There is an intrinsic weakness in the functional area 'Transitional Areal. Tighten up and split into two. Pity about the lack of co-ordination here between this study and the South Peninsula Sub-Region Plan.
10. Lack of Policy Statements in the following areas:
 - Air Space Policy ('Fly-over' and landing)
 - Marine Environment Policy (plus functional areas)
 - A policy pertaining to the purchase of private land and assessment of pre-1956 land rights and land use zonings.
 - All proposed developments must be adequately advertised, have full public participation and follow the IEM procedure.
 - Informal settlements and low-cost housing?
11. The final document must find its way to Parliament and be thoroughly debated. An appropriate commission appointed to carry the recommendations forward i.e. Specific Action Plans.
12. Links with Cape Flats and importance of these rivers and associated green belts must be emphasised.
13. Develop and extended PIPE RD? (next phase?).
14. Recommendations should be backed up with examples. Divide recommendations (subdivisions) into short, medium, etc.
15. Holistic extension of PIPE into formal urban goodl
16. Funding should be drawn from public and private sector alike.

**PENINSULA MOUNTAIN FORUM COMMENTS ON THE DRAFT POLICY FOR
MULTIPURPOSE *USE* OF THE CAPE PENINSULA (represented by M.J. Monis)**

We refer to the report on the 'Draft Policy for Multipurpose use of the Cape Peninsula' which has been prepared by the ECU. The Peninsula Mountain Forum (PMF) committee would like to congratulate the ECU on the way in which this study has been conducted in terms of the principles of IEM. It is pleasing to see a sound approach to such an important issue, that of developing an integrated and comprehensive policy for the Cape Peninsula.

We believe that the management of this area is of prime importance and support the recommendation that a single statutory authority *serve as* a custodian in this regard. Should an existing organisation fulfill this role, such as Cape Nature Conservation or National Parks Board, consideration needs to be given to the mechanism whereby public participation can be maintained (eg addressing of public concerns, involvement

in monitoring or management activities or data collection). This could be achieved through, for example, the setting up of communication structures such as a working group which includes public representatives, that meets on a regular basis. If, however, a new management body is formed then the notion of including some representatives from public bodies is appropriate.

Furthermore, the custodian needs to provide an undertaking to the general public that sound environmental management practices will be followed. This may be achieved through the formulation of a policy statement or charter, for example, and performance against this should be assessed and made public. The public should also be involved in the policy or charter formulation. An important issue that needs to be addressed in this regard is the requirement for environmental studies for new developments; the lack of such a requirement by a managing authority is evidenced in the controversy over the Cape Point Nature Reserve development. Transparency in terms of decision-making by the managing authority/custodian is paramount and a commitment in this regard must be made.

The formation of an association not for gain as per section 21 of the Companies Act (61 of 1973) is of interest. This concept is also being considered in terms of the tourism industry, which has also experienced constraints in achieving effective management because of the number of bodies involved. This idea warrants further exploration.. Should you wish to obtain additional information on the tourist industry approach, this can be done through the working committee on local and regional issues of the Cape Town Chamber of Commerce and industry.

We trust that these comments are of interest to yourselves and we wish you every success in completing this study.

DOES THE REPORT FULFIL THE BRIEF FOR THIS STUDY?

An attempt should be made to provide all interested parties with copies of volumes 2 and 3.

(Pk Z Erasmus)

Brief was to sustain mountain under an ever growing demand. Not enough accent on complexity of second half of statement.

(Mr Pt Malherbe)

Partly: The original terms of reference were modified and the emphasis subsequently placed on the type of authority required.

Difficult to determine whether the original brief has been fulfilled, as much of the information gathered has been left out.

The recommendations and policies seem a little vague and open ended - the politicians are looking to the 'experts' (UCT in this case) to come up with firm proposals.

The public participation effort has been impressive and is important in the drawing up of a strategy and plan - but freeform participation with no concrete proposals on the table will yield little.

Despite these comments, I felt that the report was concise, well-ordered and lucid - and that the really important issues are being addressed.

(Mr B Oberholzei)

Not enough reference to the economics of the matter is included.

(Mr CB Mitchell)

Two areas of serious concern arise. There is a clear and understandable environmental bias to the report. This will however not make the issue of human pressure in the form of tourism and invasion by disadvantaged communities go away. This crucial issue is hardly addressed at all.

Tourism must be much more positively and proactively addressed. It is a threat if poorly managed and irreparable damage is caused. An opportunity to generate essential revenue if used well.

Invasion by squatters is a real and growing threat. The history of Rio and other South American cities is a stark warning to us as to what could happen if the real needs of the disadvantaged are not met.

The concerns raised in the IMDF report have serious implications for the Peninsula mountain chain and an assessment of the impact land invasion could have on the mountain chain should certainly be made if only to draw to the attention of authorities the dangers for the asset as a whole.

Proactive action in this regard will of course be necessary at the metropolitan scale and will go well beyond the jurisdiction of the UTNE, but it is essential that CPPNE supports and integrates its work with MDF initiatives.

(Mr C Adams)

The responsibilities of the proposed authority and its effectiveness seem barely to be examined (or the difficulties appreciated).

(Mr S Townsend; Member; CAPE INSTITUTE OF ARCHITECTS)

While various options have been explored, there is perhaps too much of a fixation on the one option (Cape Peninsula Heritage Area - as defined) without sufficient recognition of the inevitable difficulties of achieving this option - and thus with no strategies for achievement (with contingencies) being offered. Otherwise the report does fulfil the brief - very much so.

(Mr PI Callaghan)

More time should be allocated.

(Mr JA Fudge)

But the brief requires expansion to include the manmade *interface*.

(INSTITUTE OF LANDSCAPE ARCHITECTS)

In the absence of the full brief the question cannot be answered.

(Whitelaw; Representative; CAPE BIRD CLUB)

Report concentrates on Negative aspects of current ME without offering solutions.

(Mr EJ van der Horst)

Management authority as recommended is too cumbersome, requires streamlining. Failure to include CNC as an integral part of the management authority is, in our opinion, a major flaw. No other regional authority has the expertise in environmental matters as has CNC. The appendices were only available to the majority of I.A.F.s via public libraries. Not possible to reach them, by committee, in library. The average I.A.P. who wanted to make a meaningful contribution must have found the going very tough for above reason.

(P Salter; Representative; SIMON'S TOWN FLORA CONSERVATION GROUP)

Provision needs to be made for more follow-up. One further workshop is recommended.

(Mr E Tilanu.\$)

Page 15 third last line:

'...this brief was...' should be broadened to investigate the method of implementation in more detail. I believe the report falls short of this, in that it doesn't specifically say who should ensure its recommendations are carried out, and it does not suggest a process to ensure this is done. Deadlines would have been useful too.

(Mr W van Warmelo)

Potential phasing if necessary resources are not forthcoming to implement the whole strategy.

(D Thomas)

Cannot say, as full brief not part of appendices. IT SHOULD BEI Question should not be asked without providing info. on which to assess it. Report, generally, good on theoretical and technical issues. Not too good on, in general terms, getting things in place and working. Fear that a long period will be required to work up details for implementing ideas (hopefully the good ones will still prove practical once this has been done). But, perhaps this has already been done but not yet mentioned in this report

(Mr! Gold)

Its tone is lofty, challenging and inspiring. It contains a great deal of relevant and splendidly organised information. It makes many recommendations which are both salutary and far reaching. Had its authority been a single individual, s/he would indubitably have deserved the award of a D.Sc in Environmental Science. Yet, dismayingly, it fails to meet the legitimate expectations of those like VIV6, the consultants in charge of the Southern Peninsula Sub-Regional Structure Plan, who understood that whereas this latter plan was primarily intended to suggest landuse patterns, the EEU study was basically designed to produce an implementable blueprint of management policy. Although there is no doubt that it does address important management issues, there is a seeming unawareness of the pressing need for practical conservation measures to be instituted in the here-and-now non-academic world. Even if the Report were to be accepted immediately a considerable time would have to elapse before anything positive would be likely to manifest itself.

(The Chairperson; REDHILL LAIDOWIYERS CONSERVATION GROUP)

I. The Heritage Area Idea:

This is an excellent idea, and it should be invoked in order to secure and enhance a quality known the world over as 'Capeness' or 'Cape Character'. It should be the focus around which the many sectional interests concerned with the Peninsula are drawn together in a co-operative programme of conservation, development and enhancement. But to be effective in doing so the following should be incorporated into the Report.

- i. The origins and content of the Heritage Idea and the 'um criteria for qualification must come forward early on in the report, and should reappear from time to time, as appropriate. There should be no doubt in anyone's mind that this is the backbone and motive force of the project which underpins its method and the proposal flowing from it. It should be articulated confidently and uncompromisingly.
- ii. Lustre will be addressed to the proposed Heritage status for the Peninsula if reference is made to the sorts of places internationally that have already been so designed. It would also be instructive to identify those places having some similarities of condition and context to the Peninsula as this would demonstrate that not only pristine areas quality.

2. The Proposal:

In general terms the findings, conclusions and proposals in section 4 will enjoy some support. But more than generally is required given the scale, diversity and immediacy of the pressures threatening the Heritage Area. The nature of this generality is

revealed when on removing the words Cape Peninsula, no difference is made to the sense or content of most of the proposals. The policy proposals must become context specific and concrete, and capable of guiding intervention by specific agencies in relation to specific problems in specific places in specific time frames.

2.1 The Foundations of the Proposals:

At the outset there must be a proper synthesis of the results of the primary analyses: a body of evidence must be presented with which to underpin the statements of problems and issues for which management policy must then be formulated. Synthesis maps of many kinds accompanied by the relevant qualitative and quantitative statements are indispensable, and there is no shortage information for doing this. Three in particular should be central to the current process of public debate and public education.

- i. A speculative and normative map of the ideal shape of the Heritage Area, based on the ecological sustainability premise that as far as possible, management policy should address whole Heritage systems eg. ecosystems/ plant communities, hydrological systems from crest to coast, urban heritage/cultural landscape systems, visual systems/genius loci. The object of this is to get everyone thinking and debating seriously and concretely about important concepts like sustainability, diversity, beauty, heritage, etc.

An actuality map of the Current Status and Problems of the area indicating the condition of the Heritage elements (eg. secure, threatened, conditionally retrievable, irretrievably lost) and the various pressures and threats responsible for this. This begins to direct thinking along strategic lines towards the kinds of forces that need to be confronted in particular places and with particular measures.

An opportunities map which focuses attention on the possibilities, hard options and choices to be made in securing the Heritage eg. boundary alteration, jurisdiction adjustment, public land purchase, development rights restrictions, facility construction, access restriction/promotion etc. These matters lie at the very heart of the management task and require policy guidance now.

2.2 Synthesis of Problems and Issues

The statements under the Conclusions pieces (eg 4.2.1) are insufficient as context specific statements of problems and issues, and should be considerably elaborated on in relation to the aspects referred to in 2.1 above. There should ultimately be a logical continuum of statements linking issues to objectives to Policies to Actions.

2.3 Proposals

- i. Boundary expansion: The proposed boundaries must be explicit rather than fudged because the boundary debate cannot be fudged as thorny questions relating to private property rights and expectations, and public authority jurisdictions, are involved. Equally obviously, as 'Capenese' is a quality arising from three and a half centuries of human action, the boundaries will incorporate much more than the 'pristine' biophysical legacy. Explicitness depends however

on the completeness of the steps referred to in 2.1. The Kahn Commission's work on boundaries must presumably have required input of this sort too.

functional areas: There is merit in use intensity gradient as a component of management but it must tie back to evidence and positions adopted regarding the conservation, development, and enhancement of the Heritage elements in particular places.

- **At a macro scale policy must give guidance to the relationship between wilderness, rural and urban domains on the Peninsula (ie. between natural, agriculture/forestry, and urban ecosystems). This draws attention to the boundaries/frontiers between the them, to natural and urban enclaves and excludes within the various domains, and to the corridors linking them across the three domains (there is a geopolitical analogy here as regards the shapes and relationships of different, but complementary, areas to one another). Attention is also drawn to the domain boundaries and where and how they are to be defined and held, and actually made. The types and configurations of route connections across the domains ask for attention at this scale too. Where and how these should be expanded or contracted in order to control access and isolation of the Heritage elements, according to the use intensity principle.**
- **At the meso scale policy must be guided by the reality of differing development/conservation conditions and imperatives on and around the three Peninsula blocks (northern, central, and southern). Policy needs to be tailor made in order to secure and enhance Heritage distinctiveness at this scale.**
- **At the micro scale within each block and along its boundaries a variety of localized conditions will demand appropriately fine-grained policy attention.**

At each scale therefore the relevant wilderness, rural, and urban components constituting our Heritage should be the objects of policy. Policy should be appropriately explicit with respect to the following: fynbos communities, forestry and farming, watercourses, wetlands, estuaries and aquifers, shorelines, scenic routes and footpath systems; recreational facility clusters; historic urban core and building complexes and areas of permissible urban expansion; and the location of boundaries, which are one of the means for achieving policy ends. Inevitably, a variety of maps at different scales with associated policy and action statements would emerge in this section, and they would be different from the functional Areas map which, at this stage, is still coarse-grained, unit-scaled, and static.

3. IMPLEMENTATION

Apart from the formation of a CPHAA, some reference to the need for commissioned research, and master plans within two years from the Functional Areas, there is little indication of what needs to be done on the ground, by whom, with what degree of urgency, and with what means. These questions ought to be answered in this document and they presuppose attention to many of the points made above.

A SUGGESTION:

The flow diagram on p 23 indicates that the Draft Report is to be finalised in July 1994 following this phase of public involvement. This is really the first time the public have had any exposure to the overall thinking of the Team about the nature of the problem

and the ways they think it should be dealt with - all of the other meetings have been specialised, small scale workshops on slices of the problem. The meeting in May among 6 planners involved a tiny slice of the environmental planning professions, and was insufficient as a medium for exposure, debate, and a process of mutual education between the Team and concerned professionals. That wider body of environmental planning professionals would also benefit from exposure to the legal views and the biophysical viewpoints. Everybody would benefit from something like a major workshop/panel discussion at which all sorts of views on the future management of this international asset could be thoroughly debated. The workshop would be well primed by a two-day pin-up of the centrally informative material produced by the many consultants and contained in the primary analyses. The pin-up format enables one to walk back and forth between pieces of work and follow important threads and arguments. I would like to suggest that this step be taken once the public comments from the current phase have evaluated. The products of the workshops should be considered in the production of the Second Draft Report and this Second Report should then be exposed to public scrutiny for further comment pending production of the Final Report.

(Mr B Qasson)

It was not easy to work through 3 vols of your report available only in a public library. Although we understand the Financial reason undoubtedly behind this, it was only through the good graces of a kind librarian that we were able to peruse the documents in our own time. I understand whether others had this problem with accessibility to the report. And Vol 2, which requires a lot of reading, came out so late!

(Pis GM Russell)

It appears that certain key issues have not been adequately covered. Main Report (vol. 1), Appendices (Volume 2) and Kahn Report (vol. 3) should be depicted in a flow diagram which shows how they inform Broad Policy and how the follow up work (management plan) is intended to produce detailed operational plans and programmes (see Main Report vol 1, p 16, 2nd para of 'Brief'). This must be done early in the report so that people know right away what the report will and will not be covering. There is a naive expectation among some uninformed people that this report should go as far as laying down design and management guidelines.

PUBLIC PARTICIPATION PROCESS SECTION 2.2 (MAIN REPORT p.25)

Major concerns regarding various elements of the participation process include the following:

1. **Scope and extent of participation in formulating the Policy Framework:**
 - 1.1 The draft report recognises the right of the people of Cape Town to inform the policy. However, the exercise has sampled the viewpoints of interest groups and to a lesser extent interested parties. As a result the 'scoping' process has a narrow and limited focus.
 - 1.2 The report states that once the draft policy has been completed, there will be full public participation. What would the mode of participation be? At that stage it amounts more to informing the public than allowing their participation. Public involvement in discussion of the policy framework after it has been drawn up allows few genuine options: rather it allows some feedback and as such serves only as a token of participation.

2. Sequencing of participatory methods at various stages throughout the planning exercise:

2.1 The general public should have been involved at an early stage in the exercise, to enable people to influence the process more effectively; and most importantly to create public awareness that a management plan was being proposed for the CPPNE. The ideal is to solicit public participation, other than and in addition to interest groups, in formulating a vision to guide the project.

Initial public involvement is necessary in order to:

- Allow people to articulate their own Vision,
- Identify priorities and issues of concern that affect them,
- Generate a feeling of inclusion in the process, by raising public awareness and initiating full public participation at the draft stage.

2.2 Public meetings, especially when used as a platform for introducing policy at a Metro scale, are notoriously poorly attended. The initial public meetings were held mainly at the UCT campus which is not easily accessible to the general public.

2.3 While the professional expertise of the consultants listed is beyond question, it is noted that no social science expert - or anyone with proven experience in public participation - has been consulted specifically on procedure for participation.

2.4 The questionnaire inviting public comment which was released at the same time as the draft, is aimed at a very small and highly literate group. This method is also notorious for low returns, introducing views which result in strongly biased public input in terms of who the sample represents. Broader public opinion gathered at the Vision level would have ensured a balance.

3. Method of participation:

3.1 A number of participatory methods could have been employed, for example:

- A short questionnaire administered through the interest groups to their members, to gather the views and values of the members themselves. (Establish the bona fides of interest groups, and how representative they are.)
- A telephone survey is cheap and quick, and although limited, allows some sampling by area according to socio-economic status (high, medium and low income areas).
- It would be essential to involve schools at the initial stage, for example at a project level. A high percentage of users (and future decision-makers) are scholars, especially from socially and economically deprived areas.

3.2 The report acknowledges the need to include disadvantaged communities in the process. Even if this was done through the Civic organisations, the method should include the administering of questionnaires to members. The ideas of

people from these communities must be articulated, as well as utilising the opportunity to gain community support and citizen involvement. Including people in the process from the start fosters the building of trust and confidence between ordinary citizens and those involved in decision-making.

3.3 The findings which emerge from public participation at the Vision stage could have been incorporated in mobile exhibitions (including for example a model of the area) which illustrate the proposals. This serves to highlight public involvement in the programme, as well as being an excellent method of reaching individuals not previously exposed to the issues - who would otherwise be unlikely to participate in the programme.

Such concrete and visible actions to solicit public involvement are essential, given that the study concerns policy at the Metro level and therefore a low level of interest and involvement from the general public is to be expected.

3.4 Findings relating to the current status of the project should always be presented in the media.

4. User assessments:

4.1 It is crucial to undertake user assessment surveys in order to ascertain use patterns, preferences, expectations, levels of satisfaction and so on regarding facilities, recreational areas and the mountain chain as a whole; a user survey would also have allowed a meaningful examination of a variety of user subgroups.

4.2 It is evident that the list of interest groups and affected parties who were notified is comprehensive; however, the majority of users of the Peninsula Area (including tourists who play a vitally important role) are not affiliated to interest groups. The inclusion of their perceptions would have been an invaluable contribution to the study.

4.3 Including the findings of public surveys in the process would have resulted in the policy framework being clearer, more consistent, more encompassing, and with a better chance of implementation.

(City Planner; CITY Of CAFE TOWTh City Planner's Department)

The report as a whole should be discarded because it has been commissioned by a previous authority which is unrepresentative. There are four other major tertiary institutions in the Western Cape which should have had an input into this draft policy.

(ENVIROIVIEIYTALIST SOCIETY (ENSOC))

YES:

- 1) Levels of depth adequate for Policy plan level**
- 2) Issues previously taken for Granted now tested against public**

NO:

- 1) options (plural) were asked for, whereas only 1 option emerges from report re: Authority Ructions and Powers**

- 2) the possible role of a metropolitan authority (and government) is not in any way explored. Danger here is that if your model is not accepted, the rest of the recommendations won't be followed through.
(Mr JE Avis)

Partly. The brief is too limited. The report is a good start. Immediate implementation of the brief leaves many loopholes.
(Dr J Gardner; Chairman; CAPE WETLANDS TRUST)

IS THE REPORT SUFFICIENTLY COMPREHENSIVE (WITH APPENDICES)?

Limited appreciation and info. used regarding Visitor trends, requirements, demands, seasonality, growth thereof etc. in formulating plan. Major Consideration.
(Mr N Malherbe)

Partly:
Information on natural systems and cultural overlays is not presented (even in the Appendix) and therefore a synthesised understanding of the place is not patent. We are instead asked to accept that this has taken place and accept the findings at face value - I find it difficult to accept this missing link.

(Mr B Oberholzer)

Appendices were not consulted. More precise definition of urban areas within transitional areas is required.
(Mr C Adams)

The responsibilities of the proposed authority and its effectiveness seem barely to be examined (or the difficulties appreciated).
(Mr S Townsend; Member; CAPE IIYSTITLITE OF ARCHITECTS)

Yes, but subject to further details required on functional boundaries.
(The Secretary; SMITSWIYKEL BAY RESIDENTS' ASSOCIATION)

The appendix on jurisdiction seems sketchy and somewhat inadequate.
(Mr D Wheeler)

I did not have time to consult the Appendices.
(Dr LAW MacDonald; Representative; SOUTHERN AFRICAN NATURE FOUNDATION)

More examples need to be given to illustrate the text
(Mr JM Fudge)

I haven't seen the Appendices.
(Prof (2 Branch)

Time constraints prevented me from studying the Appendices.
(Whitelaw; Representative; CAPE BIRD CLUB)

Insufficient examples of other *overseas* legal bodies which may closely suit our purposes have not been explored.

(Messrs J Levy and L Coelen; Representatives; MOUNTAIN CLUB OF SOUTH AFRICA, Cape Town Section)

Appendices not studied.

(Mr P Gra)

Report concentrates on Negative aspects of current PNE without offering solutions.

(Mr al van der Horst)

Probably sufficiently comprehensive, although I have not inspected the Appendices.

(CA Rose; Representative; SOUTHERLY AFRICA ROADS FEDERATION)

Yes, but the appendices were only available to the majority of I.A.P.s via public libraries. Not possible to reach them, by committee, in library. The average I.A.P. who wanted to make a meaningful contribution must have found the going very tough for above reason.

(P Salter; Representative; SIMON'S TOWN FLORA CONSERVATION GROUP)

Don't know - did not see appendices because of time.

(Mr J Fowkes)

The problem lies with the brief. A policy is only as good as its implementational success. The brief did not require any details of implementation. It is at this point that the viability of the policy becomes questionable. Legal, financial implications.

(Ms S Ifustwick)

1. **Practical implications of implementing CPHAA missing.**
2. **Funding of concepts/structures missing.**

(Mr If Gold)

It certainly covers the ground. In fact, it covers too much of the same ground that have previously been traversed by numerous worthwhile studies of the CPPNE, as the bountiful bibliography attests. To the untutored layman the report can come across as embodying a compulsion to reinvent the wheel. After 10 years of intensive research surely some workable strategies should have emerged which could serve as a basis on which to build a lasting and practical blueprint. One was rather hoping for a more penetrating clinical investigation into why the CPPNE has not really been properly managed thus far, and flowing from that diagnosis, some tangible recommendations, including immediate remedial measures, that could be implemented with the minimum of delay, given the considerable legislative expedients that are already in place.

(The Chairperson; REDHILL LANDOWNERS CONSERVATION GROUP)

Since vol 2 was delayed whilst vols 1 and 3 were available - answer must be 'not.

(Ms OM Russell)

1. **Inadequate consideration of financial matters and funding of concepts.**
2. **Inadequate consideration of the practical role of the proposed CPAA.**

(City Planner; CITY OF CAPE TOWN: City Planner's Department)

The report appears to be very comprehensive although I have, through my own fault, not been able to study in detail all the appendices. Volume 1 provides a good overview of the direction taken.

(CAPE PROVVIYCE MOUNTAIN CLUB)

Language unintelligible at times -jargonistic.

(V Marincowitz)

The section on Financial aspects is fairly limited. The funds that may be spent on a new central authority would be better spent on management of the conservation problems which already exist. If ownership and control is rationalised, surely it will not be necessary to spend extra finance on new highly paid positions.

(P Ivey)

Probably: It would probably take a layman like myself at least several **weeks** to absorb a reasonable amount of the highly detailed information in Vol 1, 2 and 3.

(MrD Stechman)

Yes, bearing other comments in mind.

(Mr JE Avis)

IS 'THE REPORT ACCURATE?

Cannot be with lack of visitor input as restraining factor.

(Mr N Maiherbe)

Impossible to ascertain. Information on natural systems and cultural overlays is not presented (even in the Appendix) and therefore a synthesised understanding of the place is not patent. We are instead asked to accept that this has taken place and accept the findings at face value - I find it difficult to accept this missing link.

(Mr B Oberholzer)

The Report comes across as being generally well reasoned though liable to be subjectively controversial.

(Manson-Kullin a, van der Spuy CLI; Representatives; LLANDUDNO LOCAL COUNCIL)

In so far as the question can be answered by the respondent.

(MrD Wheeler)

I hope so. Cannot disprove or prove.

(Ms S ifowes)

On the whole a great report, considering the short time available for compilation. I would have liked more time to *study* the appendices and to study the document.

(Mr IN fudge)

BUT not PASSIONATE.

(INSTITUTE OP LANDSCAPE ARCHITECTS)

The knowledge needed to give a simple answer to this question is beyond me. I would venture that this is a stupid question in its current form.

(Wlittlaw; Representative; CAPE BIRD CLUB)

Accurate against what criteria?

(Messrs J Levy and L Coelen; Representatives; MOUNTAIN CLUB OF SOUTH AFRICA, Cape Town Section)

Generally Yes. However, there were one or two inaccuracies, some mentioned previously, and also the assumption that ALL landowners would resist intrusion into their property rights, such as they are.

(P Salter; Representative; SIMOY'S TOWN FLORA CONSERVATION GROUP)

On the whole - Yes, but: Section 4.3 Cultural and scenic Diversity is lacking in accuracy. The military structures left by the Dutch and British are not necessarily the most visually dominant of cultural sites. What about cultural areas - streetscapes e.g. Simonstown (historical port). Insufficient attention is given to historic areas - too much emphasis on sites. The vineyards (part of our cultural heritage) are also visually dominant. The artistic landscaping/tree planting on Devil's Peak is probably one of the most prominent cultural sites/areas visible from the 112.

(Ms S Yustwick)

In some cases too general, esp. administrative/financial aspects.

(Mr H Gold)

In the main, yes. Some inaccuracies have, however, crept in. Appendix 8 p. 8.10 middle para, '... the onus is now on the Administrator to issue directions... Landowners are obviously going to resist any restriction or intrusion into their property rights'. The long and short of it is to apply for owners to have only two rights: The right of ownership and the right to apply for relief or betterment of the conditions of ownership. The latter 'right' if applicable to the final arbiter fails, can culminate in loss rather than gain, and is therefore a problematic privilege. Furthermore, to claim that landowners in a rim will inevitably resent 'restrictions' and 'intrusions', should these be seen by them to be necessary for the overall conservation of the special environment in which they have consciously decided to make their home, is a sweeping and unjust generalization. In fact, the generalization could serve to bolster the claims of those very landowners, eg. speculative developers, who, having no commitment to conservation, have bought into the PIPE merely out of a profit motive to the detriment of those who have specifically done so to uphold environmental values. It is a matter for regret that actual field trips did not warn against tarring all FHB landowners with the same brush.

(The Chairperson; REDHILL LANDOWNERS CONSERVATION GROUP)

Somewhat broad and generalised.

(City Planner; CITY OF CAPE TOWN• City Planner's Department)

The report doesn't reflect the reality of the lives of the majority of Capetonians. A select group of the community would stand to benefit directly if this report were to be approved.

(ENVIRONMENTALIST SOCIETY (ENSOC))

Cowling, R.M. 1991 - available from Botanical Society.: 'The Peninsula Mountain Forum is an umbrella for ALL....' p.20. The FMF does not necessarily represent the views of all its member organisations which may hold differing points of view.

(P lye))

Frobabaly. I do not have the resources to check. RE: Vol 2, Appendix 7: The list of CVs was impressive.

(Mr D Stechman)

Difficult to answer - problems with interpretation of words egAlevelopmenr. In essence - you have used the word 'development' in 15 different ways. The definition in the glossary is ok, but you don't always conform to this meaning in the text. Suggest either asterisk useage with specific different meaning, or delete it from the glossary! Functional areas are too broad to be useable and leaves leeway for tremendous destructive activity to continue.

(Dr J Gardner; Chairman; CAPE WETLANDS TRUST)

I've only had time to read Volurrie I - the main report. So my yes applies to what I've seen.

(Ms D Salters)

ARE THE RECOMMENDATIONS OF THE REPORT PRACTICABLE?

Detail plans wilt have to be worked out on the basis of being effective and practical. The report indicates this It is in itself not the final practical document. Must still become 'practicable'.

(Mr D Wightman)

I hope so.

(Prof JR GrindkA

I disagree with one statement, on pg 36: 'All alien plants that have been found to be invasive ... should be systematically eradicated'. This is too broad. There are some places where I believe alien plants and trees should be left alone, as they add to rather than detract from scenic beauty.

(Mr P Dennehy)

Here I'm uncertain: too vague, broad and operationally open-ended.

(Mr WI! Thomas)

With attention to further recommendations herewith.

(Mr IY Malherbe)

Partly: The recommendations are general, and often read like goals/objectives.

(Mr B Oberholzer)

If the recommendations are to be practicable the proposed policies will have to be clearly defined and implemented with great caution. To be considered are the impact of visitors and the methods envisaged to accomodate them with minimum impact as well as caution so that urbanisation does not detrimentally encroach upon defined protected areas.

(Mr C Adams)

The responsibilities of the proposed authority and its effectiveness seem barely to be examined (or the difficulties appreciated).

(Mr S Townsend; Member; CAPE INSTITUTE OF ARCHITECTS)

Hopefully.

(Ms M Thesen; Chairman; FRIENDS OF THE CAPE OF GOOD HOPE NATURE RESERVE)

Unsure because they are so wide ranging. Practicable IF all parties cooperate.

(Mrs B Walker; Representative; WARD 4 RATEPAYERS' ASSOCIATION)

We trust so.

(Manson-Kullin O, van der Spuy CI; Representatives; LLANDUDNO LOCAL COUNCIL)

I consider the study to have been comprehensively and professionally undertaken. The reports read extremely well. The recognition of the need to consider the Cape Peninsula as an ecological entity (marine to mountain) is commendable as this is essential to ensure effective management and control of what is rightly termed a heritage area of international importance.

I do however, consider that it will be a complex and very time-consuming process to gain support for the full recommendations from the various local and government organisations administering the existing urban areas; let alone the severance of the catchment areas from the eastern riverine systems and the arbitrary northern and eastern boundaries of the proposed Heritage Area. I could see an enormous amount of negotiation needing to take place with the respective local authorities and the future metropolitan authority before any form of consensus will be reached on these issues.

In the meantime, the need for effective management and control within the existing UTNE Area is so urgent that serious thought should perhaps be given to strategising the recommendations by firstly setting up an Interim Heritage Area Authority to take over full administrative management and control only of the existing CFPNE area - plus minor required investigations and negotiations to extend its control over the full Heritage Area as currently proposed.

(Mr M Callaghan)

Only with the support of all the Local Authorities concerned and that of the official landowners.

(Landen P, Kabalin V (Councillors); Councillors; FISH HOEK MUNICIPALITY)

I am doubtful that the Regional legislature will be prepared to allow a National body to administer this area. I am also doubtful that the National legislature will be prepared to erect a new unique act for the Cape Peninsula.

(Dr IAW MacDonald; Representative; SOUTHERLY AFRICAN NATURE FOUNDATION))

Given that it has public support, sufficient funding and professional credibility.

(INSTITUTE OF LANDSCAPE ARCHITECTS)

The knowledge needed to give a simple answer to this question is beyond me. I would venture that this is a stupid question in its current form. Many are so broadly phrased as to be impractical e.g 'how does one define societal benefits', or who are the 'certain users' who will buy (pg 40-41)?

(Whitelaw; Representative; CAPE BIRD CLUB)

If political will exists - otherwise no.

(Messrs J Levy and L Coelen; Representatives; MOUNTAIN CLUB OF SOUTH AFRICA, Cape Town Section)

Fig 6. shows functional areas contradicting existing approved structure plans. Inclusion of these as well as already developed areas creates tremendous financial and administrative problems.

(Mr EJ van der Ilorst)

We have our doubts, Again:- Management authority as recommended is too cumbersome, requires streamlining. Failure to include CNC as an integral part of the management authority is, in our opinion, a major flaw.

(P Salter; Representative; SIMON'S TOWN FLORA CONSERVATION GROUP)

Additional funding required for compensating land-owners for land placed under the City's control.

(Ms S Ilustwick)

Not without considerable additional/new funding.

(Mr II Gold)

We have already expressed doubts and reservations on this score.

(The Chairperson; REDHILL LANDOWNERS CONSERVATION GROUP)

'Yes' IF key players are willing to yield. The idea of having dual control (CCC and WCRSC) is a pointer against a unitary management authority.

(Ms QM Russell)

Not unless considerable extra funding is found; the City will not accept liability to compensate in respect of any additional land placed under its control.

(City Planner; CITY OF CAPE TOWN• City Planner's Department)

The report doesn't reflect the reality of the lives of the majority of Capetonians. A select group of the community would stand to benefit directly if this report were to be approved.

(ENVIRONMENTALIST SOCIETY (ENSOC))

Volume I defines broad principles and direction - as it should. The proof of its practicability will be in the structures and implementation processes that are put in place to support the recommendations.

(CAPE PROVINCE MOUNTAIN CLUB)

If the ownership is not consolidated then no authority would be able to manage the area. A single new authority will encounter the same problems of the CPPNE MAC. Allocate funds to management priorities, not to salaries of newly appointed executives.

(P Ivey)

BUT could be opposition from some bodies who wish to retain control over 'their' areas. I see several are not in favour of relinquishing ownership of existing natural areas. If areas are managed on a 'contractual' basis, very close monitoring will be required, otherwise the physical situation will continue as before.

(Mr D Stechman)

YES: see previous comments.

(Mr JE Avis)

With certain qualifications.

(Mr K van fluyssteen; Representative; LIYVERSTY OP STELLENBOSCH - GEOGRAPHY DEPARTMENT)

Funding will be a major problem.

Rationalising land ownership is a problem.

Including urban areas a good idea but it will cause delays.

(Mr P k Roux)

OTHER COMMENT'S ON TEE rEpORT

All the best and we hope your recommendations are used to full effect,

(Mr L Jooste)

**Excellent Work. Hope it does not end up on a file!! Requires follow-up, follow-up, .
Where do you measure success in the recommendations?**

(Mr D Wightinan)

I would welcome helping towards the management of this area.

(Prof JR Grindley)

An extensive job - incredibly well done. Congratulations! Looking forward to the final product which I hope will have the necessary influence!

(Mr Z Erasmus)

Our sincere congratulations to those who compiled this report - comprehensive and balanced.

(Mr LG Mcfwan; Chairman; LAKESIDE/MUIZENBERG RATEPAYERS ASSOCIATION)

It is too long' - and operationally unspecific!

(Mr IVIT Thomas)

Consult Infrastructure and Marketing Panels of reconstituted Western Cape Provincial Tourism Board, for additional input.

(Mr N Malherbe)

Difficult to follow the slang!

(Dr D Sleigh)

Too little time for response, considering complexity and importance of document.

(Ms M Thesen; Chairman; FRIENDS OF THE CAPE OF GOOD HOPE NATURE RESERVE)

In general I think you have succeeded in undertaking a very comprehensive overview of the situation and have succeeded in identifying the main problems and the reasons why the system is not successfully managed at present. You have also succeeded in highlighted the national and international importance as well as the regional importance of this system, especially based on its biodiversity and associated resources as well as the cultural and historic and landscape importance of this area.

(Mr ND Geldenhuys; Executive Director: Southern Parke; NATIONAL PARKS)

BOARD)

I am impressed by the enormous amount of time and effort that has been spent on the Draft Policy. I commend the participation with public bodies and the public along the way in order to formulate this Draft Policy. A great deal of thought and care has gone into it.

(Mr AZT Fourie)

With local, regional, and national government structures and role players in some disarray and seeking 'new beginnings' perhaps we may be justified in hoping that your initiative may prove to be well timed.

(Mr J Hale; Representative; SVITARTICLIF ALIEN VEGETATION ERADICATORS)

The board agreed that the UCT Report was basically very good and recommended that the UCT Report be supported in principle, but individuals would be submitting recommendations relating to Silvermine and Table Mountain.

Grave concern was expressed that the Kahn Commission Report and the UCT Report were being handled separately. It felt strongly that the demarcation indicated was incorrect and that for ecological reasons the split should be in Fish Hoek Valley.

(The Secretary; TABLE MOUNTAIN AND SILVERMINE IYRAA)

Well done.

(The Secretary; SMITSWINKEL BAY RESIDENTS' ASSOCIATION)

The Report comes across as being generally well reasoned though liable to be subjectively controversial.

(Manson-Kullin a van der Spuy CJ.: Representatives; LLANDUDNO LOCAL COUNCIL)

I consider the study to have been comprehensively and professionally undertaken. The reports read extremely well.

(Mr M Callaghan)

I think the report was exceptionally well put together - it is lucid, succinct and well set out. The team putting together deserve to be congratulated on a job well done.

(Dr IAW MacDonald Representative; SOUTHERN AFRICAN NATURE FOUNDATION)

In your glossary of terms you include hikers, climbers, walker - why not cyclists, mountain-bikers, horse-riders. Are you aware of the proposed cycle track being planned City Council and WPPA for mountain bikes? (maybe this falls outside the aims of this report). All in all I think it is a noble and good proposal. A lot of work has obviously gone into it.

(Ms S Howes)

I would like to look at more aspects of the situation on the ground, which related to the concerns felt by the man in the street BEFORE the report was brought out. This would have given more information to the reporting officers, and made their task easier in respect of 'reasons' for the CONCERNS of the man in the street.

(Mr JM Fudge)

Congratulations - this is the first document I have read that lays down the route for integrated and effective plan of action for the Cape Peninsula. Well done.
(Ms C Burgess)

The broad policies contained in the report are environmentally sound, being based on the determination of an area's value from a biotic, cultural and scenic perspective and then determining use such that societal benefits are maximised while environmental losses are minimised on a sustainable basis.
(Chief Executive Officer; LOCAL COUNCIL OF CONSTAINTIA VALLEY)

I believe the goals are achievable in a participatory democracy and that means a new political paradigm. At a meeting with developers in connection with yet another defacing development on the local mountain slope, I made the following comment which fell on deaf or uncomprehending ears - and now I make it again. In about 1922 the perceptions of conservation were vastly different to those now in vogue, and against those perceptions large tracts of mountain slope were sold to people. Now their heirs etc. want to cash in, but the perceptions about conservation are now vastly different to the 1922 mindset.

The comments are really areas of concern which have distressed me over a number of years in many battles with our local Council and Municipality over inappropriate local developments which the ordinary people of Fish Hoek have considered to the long term interests of the Fish Hoek/Noordhoek Valley.

Generally speaking, we have failed in our efforts. I firmly believe that the following propositions sway decisions the way of developers:

- 1. The spurious idea that once an area has been invaded by alien vegetation the Fynbos will never recover.**
- 2. If building does not take place Squatters will take over the area under review.**
- 3. Residents must not stand in the way of progress. (I suppose viewed from a certain angle Nagasaki and Hiroshima represented progress).**

But over and above these excuses is the crucial issue which is never mentioned that is the grading system for Municipalities.
(Mr TP KEANE; Representative; FISH 110 ELF ALIEN VEGETATION CONTROL GROUP)

It contains many sound principles but like so many Policy Documents and Guidelines in general it is so broad that it is difficult to perceive how effective it will be in achieving the goal of guiding the control of the area.

It is disturbing that the RSC has also brought out a document (April 1994) regarding the South Peninsula at the request of the Western Cape Economic Development Forum.

Does the left hand know what the right hand is doing? It is difficult to imagine the Heritage Area being managed independently of the WCEDF.
(Whkelaw; Representative; CAPE BIRD CLUB)

We do not accept the recommendations of the Kahn report to split the control of the Peninsula as it is not in the long term interests of the Peninsula.
(Messrs J Levy and L Coelen; Representatives; MOUNTAIN CLUB OF SOUTH)

AFRICA, Cape Town Section)

1. **Let's not be scared of implementing a long term plan - 20, 50, 100 yr etc.**
2. **Alternative energy sources - e.g. Electric Cars.**
3. **Effective Pollution Control - (tighter than legislation if necessary)**
4. **Encouraging sustainable resources - (Solar Power/Recycling)**
5. **What about recommendations for the rest of the wider Cape?**
6. **My congratulations to you all on an excellent job well done.**

(Mr P Gray)

As population grows the management of the CPHA is vital. Efficient management will only be achieved by well informed and environmentally interested persons. This is not the case at present as City Councillors often vote on Table Mountain issues without being aware of all the *facts*.

(Mr L de Waal)

Definition of ecotourism in glossary does not conform with general usage. Ecotourism is generally seen as an activity.

(Mr J Fowkes)

I am impressed with the scope of the report and feel that it has been well put together. It is easily readable and not filled with jargon, making it accessible to the 'concerned citizen' of the Cape Peninsula. My hope is that this valuable report does not just remain a report but that it gets the support and financial backing for implementation.

(Mr DJ McDonald)

A very difficult task to undertake - you have come up with some sound suggestions (theoretically). Hope to see them worked out in practice. Good Luck!

(Ms S Hustwirl)

Overall Conclusion on EEU Report: Admirable! With greater attention to grassroots management issues, the immediate impacts of which are most keenly felt by resident conservation-minded constituencies, this report could come to be seen as the historic instrument that served to rescue the Peninsula from environmental collapse.

(The Chairperson; REDIIIILL LAIYDOWIYERS COIYSERVATION GROUP)

(Prom Coveting Letter):

All material submitted under cover of this letter reflects the combined views of the various components of the bureaucracy and does not yet carry the approval of council. Many concerns in this submission are encapsulated in the "draft bill" (appendix 8 part A p. 8.36 para 3.10).

Council's general impression of the report is that it is thorough and well thought-through from a theoretical viewpoint. The concept of functional areas and the need for an improved overarching authority are favoured by the City.

Report style:

The recommendations, actions etc in Vol 1 (main report) do not have cross references to the Appendices, particularly Appendix 14. This is very frustrating. The final format should be such that all relevant information is presented together in one document, no matter what size the document becomes. Non-relevant information should be in appendices but the descriptions and guidelines for each of the policies should be in

the final, full document. Wording of some policies differs between Vol 1 (main report) and Appendix 14.

Planning context para 1.5 page 17: The policy plan for Signal Hill and Lion's Head (given to the UCT consultants in mid 1993) seems to have been ignored. Reference should be made to its findings.

Willing to coordinate further comment on a revised document or to workshop any issues you consider worthwhile.

(City Planner; CITY OP CAPE 70W/Y: City Planners Department)

1. **Figure 3 - Page 18**
Local Structure Plans: The Redhill, Witsands-Perdekloof and Smitswinkelbaai Local Structure Plans have been consolidated and incorporated in a more comprehensive local structure plan exercise known as the Southern South Peninsula Local Structure Plan. Figure 3 should reflect this as an example under Local Structure Plans.
2. **figure 3 should also refer to the Interim Metropolitan Development Framework and not Metropolitan Development Framework.**
3. **Reference to the Metropolitan Development Framework in the reports should be substituted with Interim Metropolitan Development Framework (IMDF).**

General:

All reference in the reports (Volumes 1 and 2) to the Western Cape Region should be substituted with the Western Cape Province. It would be helpful to number all paragraphs in the report (Volume 1).

The opportunity given to comment on the proposals is appreciated and it is hoped that the comments above will be seen as a positive contribution.

(Mr C Sullivan; Chief Executive Officer; WCRSC)

The National Monuments Council is in the process of setting up an internal workshop to discuss the conclusions and recommendations contained within the report. It is therefore premature at this stage for the NMC to comment on the document other than to make the point that the current ownership situation of the area contained within the CPPNE has always been of concern to this organisation, and the rationalisation in management terms of this unique area can only be considered to be of long term benefit to the entire environment of the Cape Peninsula. The NMC would generally be in favour of any recommendations ensuring the protection, preservation and promotion of this Heritage area in a logical and holistic manner, and therefore welcomes this draft report as an important step in the formulation of new policies and guidelines for the future management of the Cape Peninsula. The comments arising from the proposed workshop will be forwarded to yourselves at the earliest possible opportunity.

(Ms L Robinson; for REGIONAL Tanager, Western Cape; National Monuments Council)

Only to point out that:

1. **I heartily endorse J.D.Hales comments made on behalf of S.A.V.E.**
2. **These comments made in my personal capacity.**

3. I wish you all success with your thoroughly excellent and visionary report.
(II Taylor)

- 1. I would like to see the public use the fire road along the base of Devils Peak**
 - 2. Zoo should be used as another bird sanctuary.**
 - 3. Robben Island belongs to the people of C.T. not education boffins but a place of fun and laughter.**
 - 4. Seeds should be strewn all over the mountain chain.**
- (Ms S Louw)

- 1. The report appears to be focussed on "mountain issues". There is an equally strong, if not stronger case to be made for viewing this same problem from a systems, or catchment point of view.**
- 2. While I have sympathy for, and support the aims of the CPPNE, I get the impression from the report that if the questions were asked from the point of view of the catchment, i.e:- what does my water look like?**

**where does it come from?
how much? etc..**

The conclusions of this report would have been considerably different.
(V Marincowitz)

- (1) Appendix 3 page 3.18 - Simon's Town letter dated 25/03/93 and note dated 4/05/93. I note without surprise that Simon's Town is not aware of CPNA guidelines.**
- (2) 3.5 Local Authority Areas p8.33. Of possible scenarios number (iii) is the preferable. We must not worry about disagreements and conflicts lest we continue with the existing situation.**
- (3) Appendix 14, page 14.35 Guidelines i) Not only Boulders Beach but also Simon's Town coast south of Seaforth Beach and north of the Marine Oil Refiners (Dido Valley) (ii) RE: vehicles on the beach - what about municipal vehicles used for collecting seaweed, 'smoothing out' the beach and other destructive activities.**
- (4) page 14.40 item 5: RE: advertisement boards in Remote and Leisure Areas**
- (5) page 14.52: It is important to preserve natural corridors and areas within municipal (urban) boundaries.**
- (6) Page 14.51: I like the description 'cryptic ablutions'. At present (and in the past) town engineers approve their own plans and erect hideous structures on our coastline.**
- (7) Regarding the use of airspace - this needs attention. There are now sight seeing trips around the Peninsula by helicopter. Several times recently I have been in the Cape of Good Hope Nature Reserve when the tranquility has been shattered by helicopters flying over. Overflights should only be permitted for emergencies or restricted to 'bona fide' airlines flying over above a stipulated ceiling.**

- (8) Appendix 11: List of I&AP's: the Friends of Simon's Town Coastline is not included presumably because we were only inaugurated in terms of the Wildlife Society Friends Scheme on 11 October 1993. Please could our address be added to the mailing list for future information.**

(Mr D Stechman)

With the exception of 4.6.3, useful synthesis has emerged is already guiding/informing statutory planning. It would be useful for major gaps in knowledge or applications to be brought to the clients attention.

(Mr JE Avis)

I am surprised that the Redhill squatter community, or people working alongside them, do not seem to have received the report?

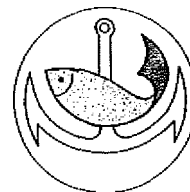
(Ms D Salters)

SEA FISHERIES/SEEVISSERYE

Address/Adres
Foretrust Building/gebou
Martin Hamruerschlag Way/weg
Foreshore/Strandgebied
Cape Town/Itaapstad
8001

Postal Address/Posadres
Private Bag X2/Privaatsak
Rogge Bay/Roggebaai
8012

Fax/Faks
(021)25-2920



Reference/Verwysing
Yr1/a1/1/2

Telephone/Telefoon
402-3217

Enquiries/Navrae
L. BOTHA

7/L/q2

Professor R. Fuggle
Project Leader: CPPNE Project
Environmental Evaluation Unit
University of Cape Town
RONDEBOSCH
7700

Dear Professor Fuggle

DRAFT POLICY FOR MULTIPURPOSE USE OF THE CAPE PENINSULA

The Director of the Sea Fisheries Research Institute (SFRI) was recently sent a copy of the draft policy for comment. In view of the nature and scope of the document I believe that it would be more appropriate for me to provide you with the requested assessment, which I have pleasure in appending. Comments from SFRI are incorporated therein.

While I, do not intend to repeat my assessment in this covering letter, I do wish to express my disappointment that matters of **policy** on living marine research which are *de facto* the line \, / function responsibility of Sea Fisheries have been addressed by your team without consultation with us until this rather late stage.

The result is in my view a draft policy which, from the marine living resources perspective, is flawed - inadequately researched and motivated. While I have attempted to address the main concerns in my assessment, I do believe that it would be wise for you to discuss the proposals in some detail with key Sea Fisheries staff before your documents are finalised.

Yours sincerely

CHIEF DIRECTOR: SEA FISHERIES

**COMMENTS BY THE SEA FISHERIES RESEARCH INSTITUTE ON THE
"DRAFT POLICY FOR MULTIPURPOSE USE OF THE CAPE PENINSULA"**

The stated purpose of the document is to recommend policies and broad guidelines for the future management of the protection and use of the Cape Peninsula.

In Volume 1 it is suggested (on p.9) that the area presently called the Cape Peninsula Protected Natural Environment (CPPNE) should be expanded to include a portion of the surrounding seas (and urban fringe) to become an area known as the Cape Peninsula Heritage Area. This has implications for Sea Fisheries, which has jurisdiction over the intertidal zone and surrounding seas off the Cape Peninsula. At this stage, the report makes no recommendation about the extent of the proposed offshore limit of the proposed Heritage Area.

Most of Volume 1 highlights problems concerned with managing the terrestrial part of the Cape Peninsula, and likely changes to take place both in the short- and medium-term in the Metropolitan region. Volume 1 makes scant reference to the marine environment *per se*, although it does suggest (on p.43) that exclusion of the marine environments from the CPPNE "militates against optimising use of these areas". The document calls for a holistic management approach, advocating that the marine, coastal and terrestrial environments constitute a functional unit, both in ecological and recreational terms.

The following comments relate to Volume 2 of the report viz. Appendices. In this volume, a total of 14 Appendices present details of various aspects of the investigation, ranging from historical background to lists of interested and affected parties. According to the list of "Interested and Affected Parties" (Appendix 11) it is evident that Sea Fisheries, the National Parks Board and the CPA amongst many other statutory bodies, are acknowledged. However, from the lists of meetings held (Appendix 12) it is evident that although CPA and National Parks were consulted extensively, it does not appear that Sea Fisheries was involved at all in the planning stages. (Note that reference was made on p.15.6 to comments made by Ms L. Jackson, of the Environment Monitoring Group (L. Jackson also of the Sea Fisheries Research Institute) to Circular 1 - but presumably only in her private capacity). Of interest also is the suggestion by Mr R. Horn, Director of Civic Amenities (ex-SFRI technician), that Robben Island should be incorporated into the enlarged CPPNE (p.13.55), also the suggestion by the CPA that inclusion of marine areas would strengthen the protection status of the CPPNE (p.13.55). Further interesting and relevant background comments are indicated on pages 13.70 and 13.74.

Detailed comment are given below on Appendix 14, Part B, Section 3, which deals specifically with marine and coastal environments:

Description: Reference to the Agulhas current in False Bay should be removed. The brief description below, prepared by Sea Fisheries for a symposium on the future of False Bay at Simonstown on 21 November 1991, may be of use to the authors of the document in revising the description:

False Bay is an area of overlap of the typical West Coast cold-water species and the warmer-water species more typical of the south and south-west coasts of the Cape. So, for example, west coast lobsters are found within the bay (although nowhere near as abundant as on the western side of the Cape Peninsula), and snoek and hottentot fish are also found in abundance. Many other linefish species, typical of the southern Cape, migrate into and out of the bay. This diversity of marine life makes the bay an interesting and attractive region for a wide diversity of nature-lovers, recreation-seekers and commercial operators. The need for equitable sharing of marine resources amongst this wide variety of user-groups dominates the agenda for management strategies which need to be adopted to help conserve the bay's resources in the future.

Page 14.34, 2nd paragraph

As regards seabirds, another area of particular importance is the breeding sites of oyster-catchers within the Cape of Good Hope Nature Reserve (Area 1 in Fig. 1 attached).

Page 14.34, last paragraph

This paragraph contains a sweeping statement, a generalization unsupported by documented facts or statistics. It is because of the very real concern about overexploitation that a large number of marine conservation areas have already been established by Sea Fisheries, on both the Atlantic and False Bay sides of the Cape Peninsula, beginning with the rock lobster sanctuary extending from Melkbosstrand to Chapman's Peak (first established early 1900s), followed by the Castle Rocks Marine Reserve in False Bay (established 1979), and ending with the promulgation of the 10 marine conservation areas of the Cape Peninsula Marine Conservation Area in 1986 (see Fig. 1 attached). Although it is agreed that enforcement of conservation regulations is far less effective in some areas than others, and also that certain conservation areas in False Bay could profitably be amalgamated/consolidated, in general the document totally ignores the manifold steps which have already been taken, in consultation with the Divisional Council of the Cape, as well as Fish Hoek municipality and Professor J. Field of UCT to establish better control over both commercial and recreational exploitation from the shores of the Cape Peninsula. (See Appendix A attached).

Other than the sweeping statement made in this paragraph about alleged stock depletion, no attempt has been to evaluate current conservation measures for marine organisms, nor their effectiveness. This is a serious shortcoming of the report. My impression is that the authors of the report were unaware of

existing legislation concerning marine conservation around the Peninsula, because at no time was Sea Fisheries consulted during the process of drawing up the report.

In the same paragraph, it is noted that pollution is a threat to the marine environment, and as such, Sea Fisheries is encouraged to see this aspect highlighted in the "POLICY" stated later on p.14.35. However, to state that "inappropriate" exploitation should be prevented or protected in the "POLICY" is too vague. I would suggest that the last two words of the stated "POLICY" / should be non-sustainable exploitation.

Page 14.35 Guidelines

- Item 2 At present Sea Fisheries has jurisdiction over the living marine resources of the sea up to the high water mark. It would require a major change in government policy if Sea Fisheries were to hand over management and control of the intertidal zone and the nearshore coastal seas surrounding the Cape Peninsula to a nebulous body charged with protecting the proposed "Cape Peninsula Heritage Area". So-called boundaries or lines drawn in the sea are notoriously difficult to demarcate for control purposes. For practical reasons alone, it would be far more appropriate to limit the boundaries of the proposed Heritage Area to the existing boundaries of the CPPNE, i.e. to the high water mark everywhere around the Peninsula. It is worth noting that the coastline between Kommetjie and Cape Point supports a commercial rock lobster fishery with a TAC currently of 880 tons (worth over R50 million). This is the largest and most important commercial fishery off the Cape Peninsula, and it is imperative that fishing should not be hindered in any way by proposed Heritage boundaries. Note that currently the seaward boundaries of marine reserves in the Peninsula area vary from 500m offshore (Areas 7, 9 and 10 in Fig. 1 attached) to one nautical mile offshore in Area 4 (Castle Rocks Marine Reserve) to 12 nautical miles offshore in Cape Peninsula rock lobster sanctuary.
- Item 4 Stormwater is always likely to be polluted by garbage, animal faeces, etc. Can this really be prevented?
- Item 6 Sea Fisheries fully endorses sustainable utilization (by both commercial and recreational sectors) as a keystone element of its marine conservation and utilization policy. Further monitoring and research in this field, both off the Cape Peninsula and elsewhere along the coast, is promoted and encouraged.
- Item 8 If new or more extended marine reserves are to be proclaimed, it will be essential to ensure that all interested and affected parties are consulted. Owing to the very large diversity of user-groups involved, any new proposals have to be very carefully planned and presented to all parties.

Item 9

It would be difficult to argue that the marine environment of the Cape Peninsula is unique and therefore deserving of special heritage status. On the western side of the peninsula, the marine fauna and flora are generally typical of the southern portion of the West Coast Benguela upwelling system, with normal kelp beds and associated fauna in the nearshore zone. Although the underwater reefs off Cape Point are spectacular, colourful and certainly exciting for divers, similar reefs can be found within False Bay and elsewhere east of Cape Hangklip. As regards visual impact, I would agree entirely that the Cape Peninsula/Cape Point vistas are unique and unparalleled, but this should not be confused with the marine environment *per se*.

comsfri.dp

4 LIST OF INTERESTED AND AFFECTED PARTIES

(compiled by the University of Cape Town)

NUOS AND USERS

ABALIMI BEZEKHAYA
BOTANICAL SOCIETY OF SA
BOY SCOUTS OF SA
CACE
CAPE BIRD CLUB
CAPE INSTITUTE OF ARCHITECTS
CAPE MAZAAR SOCIETY
CAPE NATURAL HISTORY CLUB
CAPE PISCATORIAL SOCIETY
CAPE PROVINCE MOUNTAIN CLUB
CAPE TECHNIKON
CAPE TOWN ECOLOGY GROUP
CAPE TOWN HERITAGE TRUST
CAPE WETLANDS TRUST
CAPTRA
CAPTRUST
DEVELOPMENT ACTION GROUP
EAGLE ENVIRONMENTAL
EARTHLIFE AFRICA
ECCO AND KLEINMOND CONSERVATION SOCIETY
ECOPROGRAMME
ENDANGERED WILDLIFE TRUST
ENVIRONMENTAL LAW ASSOCIATION
ENVIRONMENTAL MONITORING GROUP
ENVIRONMENTAL STUDIES - CAPE TECHNIKON
EPPIC: WESTERN CAPE REGION GROUP
EQUAL OPPORTUNITY FOUNDATIONS
FAIREST CAPE ASSOCIATION
FIRST STEENBERG ROVERS GROUP
FISH HOEK ALIEN VEGETATION CONTROL GROUP
FISH HOEK THINK TANK
FISH HOEK VALLEY HISTORICAL ASSOCIATION
FOUNDATION FOR CONTEMPORARY RESEARCH
FRIENDS OF BOTRIVEER ESTUARY & ENVIRONS
FRIENDS OF CGHNR
FRIENDS OF OBSERVATORY
FRIENDS OF PAARDEN EILAND WETLANDS
FRIENDS OF THE QUAGGEI3ERG
FRIENDS OF RIVERLANDS
FRIENDS OF RONDEBOSCH COMMON
FRIENDS OF THE LIESBEEK
FRIENDS OF RIETVLEI
FRIENDS OF SILVERMINE NATURE RESERVE
FRIENDS OF TABLE MOUNTAIN
FRIENDS OF TABLEVIEW
FRIENDS OF TYGERBERG

GIRL GUIDES ASSOCIATION
GRASSROOTS EDUCATION TRUST
GREEN COALITION
GREENLIFE ECOTOURS
HABITAT COUNCIL
HISTORICAL SOCIETY OF CAPE TOWN
HOUT BAY MUSEUM
INSTITUTE OF LANDSCAPE ARCHITECTS
KARBONKELBERG TRUST
KLEINBERG ENVIRONMENTAL GROUP
KOMMETJIE ENVIRONMENTAL AWARENESS GROUP
MOUNTAIN CLUB OF SOUTH AFRICA
MUSLIM JUDICIAL COUNCIL
NATIONAL SEA RESCUE INSTITUTE
NATURAL HISTORY CLUB
NATURALIST SOCIETY
NEW HORIZONS OUTDOOR ASSOCIATION
NOORDHOEK RIDING ASSOCIATION
OCEAN VIEW DEVELOPMENT TRUST
PEDAL POWER FOUNDATION OF SA
PENINSULA ORIENTEERING CLUB
PENINSULA TECHNIKON
REDHILL HACKERS
REMELT, LANDOWNERS CONSERVATION GROUP
ROYAL SOCIETY OF SA
SANDY BAY CONSERVATION TRUST
SAVE CHAPMAN'S PEAK ACTION GROUP
SILVERMINE RIVER SOCIETY
SIMON'S TOWN FLORA CONSERVATION GROUP
SIMON'S TOWN HISTORICAL SOCIETY
SIMON VAN DER STEL FOUNDATION
SOCIETY OF ARCHITECTS, PLANNERS, ENGINEERS AND SURVEYORS
SOUTH AFRICAN ARCHAEOLOGICAL SOCIETY
SOUTH AFRICAN ASSOCIATION OF BOTANISTS
SOUTH AFRICAN CULTURAL HISTORY MUSEUM
SOUTH AFRICAN NATIONAL FOUNDATION FOR THE CONSERVATION OF COASTAL BIRDS
SOUTH AFRICAN TRAWLING ASSOCIATION
SOUTHERN AFRICAN ORNITHOLOGICAL SOCIETY
SOUTH AFRICAN SPELEOLOGICAL ASSOCIATION
SOUTH PENINSULA ENVIRONMENT FORUM
SOUTHERN AFRICAN NATURE FOUNDATION
SUNBIRD ENVIRONMENTAL RECREATION CENTRE
SURPLUS PEOPLE'S PROJECT
SWARTKLIP HACKERS
THE URBAN FOUNDATION
VELD & VLEI
VOETSLAANFEDERASIE VAN SUID-AFRIKA: WES-KAAP
WESTERN CAPE MARINE CONSERVATION SOCIETY
WESTERN PROVINCE COUNCIL OF CHURCHES
WESTERN PROVINCE MOUNTAIN CLUB
WESTERN PROVINCE PEDAL POWER ASSOCIATION (& ROMP)
WESTERN PROVINCE ROAD RUNNING ASSOCIATION
WESTERN PROVINCE SENIOR SCHOOLS SPORT UNION
WILDERNESS LEADERSHIP SCHOOL
WILDLIFE SOCIETY OF SOUTHERN AFRICA
ZANDVLEI TRUST

INDIVIDUALS

PETER ADAMS
JERRY AVIS
H. BREDEKAMP
M. CLARK
INGRID COETZEE
BILLY DANIELS
ACHMAT DAVIDS
DEIDRE ECKSTEIN
M. EUSTON-BROWN
BARRY CIASSON
H. GLASS
COMMANDER GROBBELAAR
JIM HALLMAN
TIM HART/DAVE HALCUTT
H. HARRIES
OWEN KINNEHAN
BEN KOPFER
SALLY LOUW
DAVE MCDONALD
CRAIG MERCER
C.L. MERRY
JEREMY MIDGLEY
M.A. MINICKI
PAM NEWBY
SUZIE NEWTON-KING
N.E. OCKLERS
ANDRE ODENDAAL
HOWARD PHILLIPS
OLIVER PRICE
A. RAAD
ANDRE RABIE
EBRAHIM RASOOL
CIRAAJ RASOOL
BARRY ROSE
ALBIE SACHS
J.C. SAMUELS
A.N. STARK
FABIO TODESCHINI
SANDY TOLOSANA
LESLIE WITZ

RATEPAYERS ASSOCIATIONS AND LOCAL COUNCILS

CAMPS BAY & DISTRICT CIVIC ASSOCIATION
CONSTANTIA VALLEY LOCAL COUNCIL
FALSE BAY BUSINESS AND PROFESSIONAL ASSOCIATION
FISH HOEK RESIDENTS' RATEPAYERS ASSOCIATION: ENVIRONMENTAL SUB-COMMITTEE
FISH HOEK RATEPAYERS ASSOCIATION
GREENPOINT AND SEAPOINT RATEPAYERS ASSOCIATION
HELPMEKAAR RATEPAYERS ASSOCIATION
ROUT BAY RESIDENT'S ASSOCIATION
KALK BAY, ST JAMES & CLOVELLY RATEPAYERS ASSOCIATION
KOMMETJIE LOCAL COUNCIL
LAVENDER HILL RESIDENT'S ASSOCIATION
LLANDUDNO LOCAL COUNCIL
LOWER GARDENS CIVIC ASSOCIATION
MITCHELL'S PLAIN CIVIC ASSOCIATION

MUIZENBERG RESIDENT'S AND RATEPAYERS ASSOCIATION
NOORDHOEK DISTRICT ASSOCIATION
OCEAN VIEW MANAGEMENT COMMITTEE
PELIKAN PARK RATEPAYERS ASSOCIATION
RETREAT/STEENBERO CIVIC ASSOCIATION
ROCKLANDS RATEPAYERS ASSOCIATION
SCHOTSCHE KLOOF MANAGEMENT COMMITTEE
SIMON'S TOWN RATEPAYERS AND RESIDENTS ASSOCIATION
SMITSWINKEL BAY RESIDENTS ASSOCIATION
STRANDFONTEIN RATEPAYERS, CIVICS AND WELFARE ASSOCIATION
SUNNYDALE RESIDENTS ASSOCIATION
SUNNYDALE RATEPAYERS ASSOCIATION
TAFELSIG RATEPAYERS ASSOCIATION
UPPER TABLE VALLEY RATEPAYERS ASSOCIATION
WARD 4 RATEPAYERS ASSOCIATION
ZEEKOEIVLEI CIVIC ASSOCIATION

POLITICAL, COMMUNITY AND LABOUR ORGANISATIONS

AFRICAN NATIONAL CONGRESS
AZANIAN PEOPLE'S ORGANISATION
CAPE AREAS HOUSING ACTION COMMITTEE
CONGRES OF SOUTH AFRICAN TRADE UNIONS
CONSERVATIVE PARTY
DEMOCRATIC PARTY
INKATHA FREEDOM PARTY
NATIONAL COUNCIL OF TRADE UNIONS
NATIONAL PARTY
NEW UNITY MOVEMENT
PAN AFRICANIST CONGRESS
SOUTH AFRICAN COMMUNIST PARTY
SOUTH AFRICAN NATIONAL CIVICS ORGANISATION
WESTERN CAPE UNITED SQUATTERS ORGANISATION
WOMEN'S ALLIANCE
WORKERS ORGANISATION FOR SOCIALIST ACTION

BUSINESS, FARMING AND LABOUR

AFRKAANSE HANDELSINSTITUT
BUITENVERWACIMNO FARM TRUST (PTY) LTD
CAPE FLATS DISTRICT FARMERS ASSOCIATION
CAPE PENINSULA INFORMAL TRADERS ASSOCIATION
CAPE TOWN 2004 OLYMPIC GAMES STUDY TEAM
CAPE TOWN CHAMBER OF COMMERCE
CITY TRAMWAYS
CODETA
CONSTANTIA WINE ROUTE
FABCOS
FEDHASA
FISH HOEK CHAMBER OF COMMERCE
HILTON ROSS TOURS
MANNENBERO INFORMAL TRADERS ASSOCIATION
METRO COMMUTERS ASSOCIATION
PLANTS CAPE (PTY) LTD
SATSA
SERINA KAOLIN (PTY) LTD
SMALL BUSINESS DEVELOPMENT CORPORATION
SOUTH AFRICAN PROPERTY OWNERS ASSOCIATION
SOUTH AFRICAN ROAD FEDERATION
TABLE MOUNTAIN CLIMB COMPANY

WESTERN CAPE INFORMAL TRADERS ASSOCIATION
WESTERN CAPE TRADERS ASSOCIATION
ZELLER KARROO

LOCAL AND REGIONAL AUTHORITIES

CAPE PROVINCIAL ADMINISTRATION
CAPE TOWN CITY COUNCIL
FISH HOEK MUNICIPALITY
NATURE RESERVE ADVISORY BOARDS
SIMON'S TOWN MUNICIPALITY
WESTERN CAPE REGIONAL SERVICES COUNCIL

CENTRAL GOVERNMENT DEPARTMENTS AND PARASTATALS

CAPE EDUCATION MUSEUM
CAPE PENINSULA REGIONAL DEVELOPMENT ASSOCIATION
CPRDA TOURISM COMMITTEE
CAPTOUR
DEPARTMENT OF ENVIRONMENT AFFAIRS
DEPARTMENT OF MINERAL AND ENERGY AFFAIRS
DEPARTMENT OF PUBLIC WORKS
DEPARTMENT OF SEA FISHERIES
DEPARTMENT OF TRANSPORT
DEPARTMENT OF WATER AFFAIRS
GROOTE SCHUUR **HOSPITAL**
NATIONAL BOTANICAL INSTITUTE
NATIONAL MONUMENTS COUNCIL
NATIONAL PARKS BOARD
SOUTH AFRICAN DEFENCE FORCE
SAFCOL
SATOUR
SOUTH AFRICAN MUSEUM

COMMITTEES, SUB-COMMITTEES AND COMMISSIONS

ENVIRONMENTAL DATA SUB-COMMITTEE OF MAC
FIRE CONTROL SUB-COMMITTEE OF MAC
FINANCIAL SUB-COMMITTEE OF MAC
PLANNING STEERING COMMITTEE OF MAC
RATIONALISATION WORKING GROUP
RECREATIONAL SUB-COMMITTEE OF MAC
TECHNICAL SUB-COMMITTEE OF MAC
WESTERN CAPE ECONOMIC DEVELOPMENT FORUM (WCEDF)
URBAN DEVELOPMENT COMMISSION OF WCEDF
DEVELOPMENT STRATEGY COMMISSION OF WCEDF

CONSULTANTS

MARK CALLAO I-LAN

NOEL DE VILLIERS
GAWIE FAGAN
CSIR FORESTEK
CSIR INFORMATION SERVICES
HILL KAPLAN-SCOTT INC.
JAN HOFMEYER
KANTEY & TEMPLAR
BJ OBERHOLZER
MLII ARCHITECTS
NINHAM SHAND
REVEL FOX & PARTNERS
LESLEY SHACKLETON
STEFFEN, ROBERTSON & KIRSTEN
TAYLOR, VAN RENSBURG, VAN DER SPUY & VISSER
THE PLANNING PARTNERSHIP
URBAN DYNAMICS
VAN NIEKERK, KLEYN & EDWARDS
WATERMEYER, PRESTEDGE & RETIEF
WESGRO
ZILLE SHANDLER

MEDIA

AFRICAN WILDLIFE
ARGUS
CAPE TIMES
CITY NEWS
CONSTANTIA REVIEW/CAPE TIMES
DIE BURGER
FALSE BAY COASTAL CHATTER
FALSE BAY ECHO
NORTHERN ARGUS
PEOPLE'S EXPRESS
SCIENCE COMMUNICATIONS
SOUTHERN ARGUS
SOUTH
THE TAXI TIMES
TV NEWS
TYGER-BURGER
WEEKLY MAIL

As part of the public participation process of UCT's project, five circulars have been sent to interested and affected parties (I&APs).

Circular #1 was sent to I&APs to provide background information on the project, and to obtain their comment on the following: a draft overarching vision for the management of the CPPNE; a draft list of factors requiring the formulation of policy guidelines; information on the process and estimated timing of the project; and a list of organisations being consulted.

Circular #2 was sent to 234 I&APs to provide those who did not receive Circular #1 with some background information; to inform I&APs of the responses to Circular #1; to address some of the concerns raised; to present I&APs with the preliminary findings of the project; to elaborate on the process being followed by the University of Cape Town; and to inform I&APs as to how they could contribute further.

Circular #3 was sent to 234 I&APs to inform them of the anticipated dates that the draft, popular and final reports would be made available.

Circular #4 was sent to 234 I&APs to give the new schedule for public participation, and to explain the delay in the production of the draft reports.

Circular #5 was sent to 300 I&APs providing information on the public presentations; what the draft report would consist of; and how I&APs could provide their input to the draft report.

Circular #6 was circulated to 300 I&APs as a reminder of the public meetings and closing date for comments on the draft policy report.

A final circular was sent to all those who responded to the draft policy report. This served to inform I&APs as to how their comments would be included in the final report.



Environmental Evaluation Unit

University of Cape Town Rondebosch 7700 South Africa
Telephone: (021) 650-2866/7 Telex 5-22208
Fax No: (021) 650-3791

UNIVERSITY OF CAPE TOWN POLICY GUIDELINE DOCUMENT FOR MANAGING USE OF THE CAPE PENINSULA MOUNTAIN CHAIN

CIRCULAR # 1

To: All interested and affected parties

From: Executive Committee: UCT CPPNE Project

Date: 22 April 1993

Note: This circular will take 15 minutes to read and requires a short written or verbal response

WHAT IS THE CPPNE?

The CPPNE (Cape Peninsula Protected Natural Environment) is the mostly undeveloped area stretching from Signal Hill to Cape Point. This includes most of the mountain area and, in some places, vleis and beaches (see attached map).

WHAT IS THIS PROJECT ABOUT?

This project is about developing policy guidelines for the management of the CPPNE. The aim of the project is, by early 1994, to have prepared a policy guideline document which will enable present or new government structures to manage the area in a way that will be most beneficial to most people, over a long period of time. These guidelines will be within the context of the Metropolitan Development Framework (MDF), presently being developed for the Cape Metropolitan Area, and will interrelate with the Western Cape Economic Development Forum (WCEDF).

WHO IS DOING THE PROJECT?

The University of Cape Town has been appointed by the Administrator of the Cape as the consultant for the project. The Cape Provincial Administration, the Cape Town City Council and the Western Cape Regional Services Council are paying for the work. The Environmental Evaluation Unit at UCT is administering the project and a range of UCT and, where necessary, non-UCT experts are providing input to the study. Ms Farieda Khan of the Environmental Advisory Unit is consulting community- and mass-based organisations. Ms Sue Lane of the Environmental Evaluation Unit is coordinating the project.

HOW CAN YOU CONTRIBUTE?

To start the planning process for this project the UCT research team would like your immediate comment on the attached documents. Please could you read through these background documents and send us a SUMMARY, IN POINT FORM, OF YOUR MAJOR CONCERNS ABOUT AND SUGGESTED SOLUTIONS FOR THE FUTURE USE OF THE CPPNE (the area under consideration is shown on the attached map). Should you wish to make a verbal representation to us at some point, please let us know. We will arrange an interview at an appropriate juncture in the programme.

At this stage, we do not expect anyone to have a mandate from their organisation to present their organisation's view. This mandate would be obtained at a later stage in the project, the timing of which will largely depend on the nature of issues which arise at this initial planning phase. We would thus be happy for you to initially contribute in your personal capacity.

DESCRIPTION OF ATTACHED DOCUMENTATION

DOCUMENT I presents an overarching "vision" for management of the CPPNE, as well as a list of some of the more detailed issues which may need to be considered in this project. PLEASE CHECK THE LIST AND INCORPORATE YOUR COMMENTS, AND ANY OTHER ISSUES WHICH NEED TO BE ADDRESSED, INTO A WRITTEN SUBMISSION TO US. YOU ARE ENCOURAGED TO DESCRIBE YOUR OWN "VISION/S" FOR THE AREA SHOULD IT DIFFER FROM THE OVERARCHING VISION SUPPLIED.

- DOCUMENT 2 broadly outlines the steps involved and the timing of public involvement in the process. ANY COMMENTS WOULD BE WELCOMED.

DOCUMENT 3 lists all the organisations to whom we have sent this first circular. PLEASE CHECK THE LIST AND SUPPLY US WITH THE NAMES, ADDRESSES AND CONTACT NUMBERS OF ANY OTHER ORGANISATIONS WHO YOU FEEL SHOULD BE INVITED TO PARTICIPATE ON THIS PROJECT. We will then send them copies of this circular to comment on, as a first step.

HOW WILL YOU OBTAIN FEEDBACK?

Once interested parties have responded, we will send you a summary of their major concerns and a plan, for your comment, of how we could deal with these concerns.

TIMING

So that we can get started, please could you respond AS SOON AS POSSIBLE. Those who respond will be consulted throughout the project. The views which you express will be considered by the UCT consultants and will be incorporated wherever it is possible to do so. Note that this is NOT A ONE-OFF COMMUNICATION. There will be ample opportunities for you to express your opinions at a later stage in the project. Your input at an EARLY STAGE is, however, recommended to enable you to most effectively influence the process.

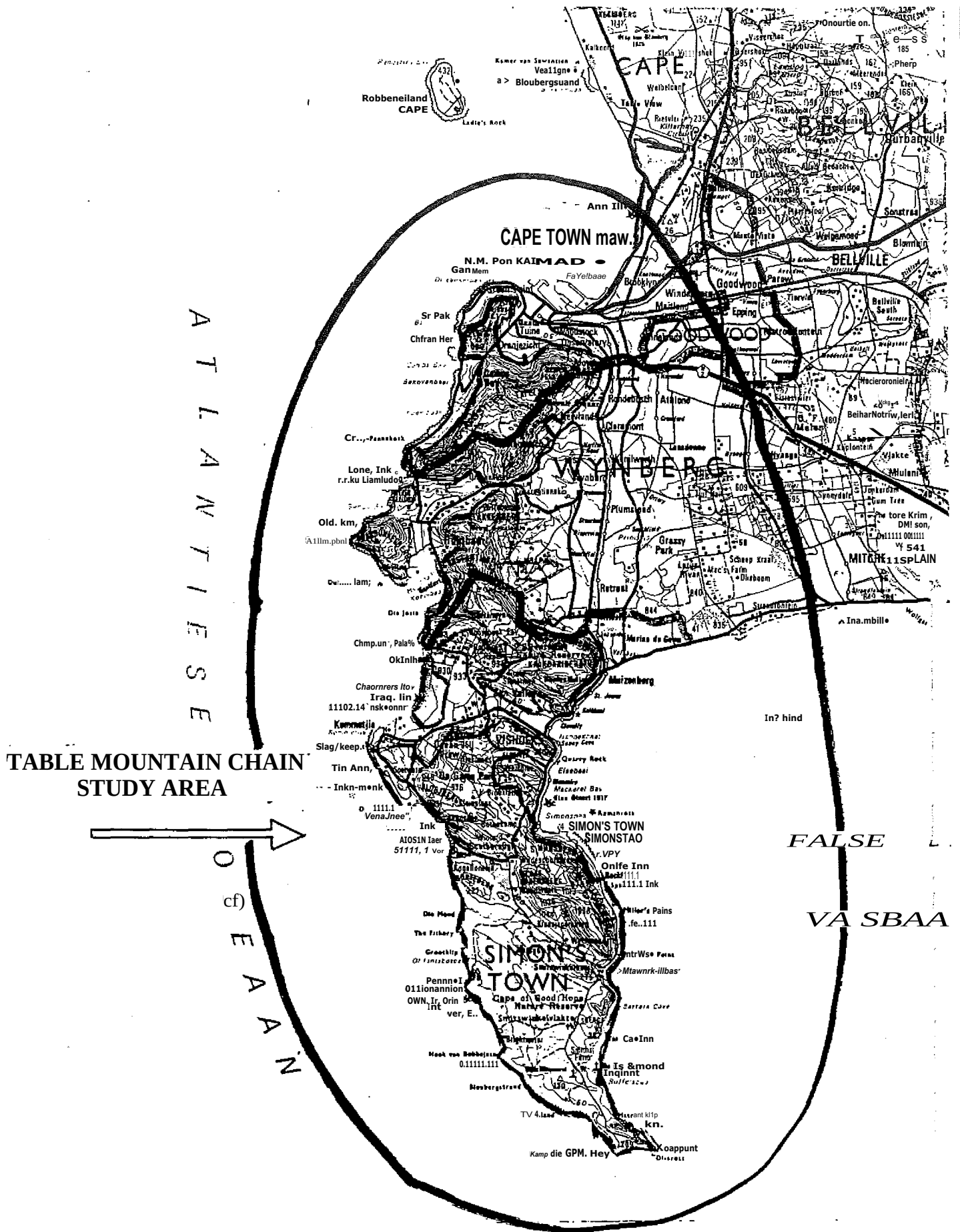
Please do not hesitate to contact the project coordinators (Sue Lane or Rachel Wynberg) should you have any queries about how to respond to this circular.

We look forward to your participation in this project.

Yours sincerely

z ?a7 4

Professor Richard Fuggle



CPPNE: POLICY GUIDELINES PROJECT

DOCUMENT 1

DRAFT OVERARCHING 'VISION FOR MANAGEMENT OF THE CPPNE

The following paragraph is an overarching "vision" for the future management of the Cape Peninsula Mountain Chain. This vision is a SUGGESTION ONLY WHICH HAS BEEN DRAFTED FOR YOU TO COMMENT ON. IF YOU DO NOT AGREE WITH THIS BROAD STATEMENTS PLEASE DETAIL YOUR CONCERN IN A WRITTEN SUBMISSION. YOU ARE ENCOURAGED TO DESCRIBE YOUR OWN VISION/S FOR THE MOUNTAIN CHAIN.

OVERARCHING "VISION"

The Cape Peninsula Mountain Chain should be regarded as both a national and an international asset, because of its spiritual and material values. These values translate into products (services and goods) in the form of symbols, recreation, aesthetics and life-support systems. These products and their synergies are irreplaceable and constitute an environmental resource that should be utilised on a sustainable basis as far into the future as possible by as many people as possible. Hence, the management of the utilisation should aim primarily at maximising social gains and minimising the loss of natural resources.

DRAFT LIST OF FACTORS REQUIRING THE FORMULATION OF POLICY GUIDELINES

The following headings represent factors about which policy guidelines for the CPPNE may need to be formulated. Below each heading pertinent elements which may have to be addressed are listed. As the intention is to capture concepts and ideas in point form, full sentences and explanatory phrasing have been avoided.

1. LOCATION OF THE BOUNDARIES OF PROTECTED AREA/S

- ✓ **Administrative** considerations
 - Cadastral
 - Criteria for delimitation of or change to present boundaries
 - Ecological considerations (eg patterns of biodiversity and endemism of fauna and flora)
 - Geographical considerations

2. NATURE OF THE BOUNDARY INTERFACE/FRINGE

- Between **built/natural** environment
- Between natural environment and transition zone
- Characteristics of area
- Hard/soft definition
- Morphology
- Sea/mountain interface - ecological, aesthetic

3. EXTENT/SIZE OF PROTECTED AREA

- Air space above
- Areal extent
- Contiguous or islands (Biosphere Reserve concept)
- Mineral rights beneath

4. CONTROLLING AUTHORITY OR AUTHORITIES

- Contractual national park
- Delegation of management
- Devolution of management
- Local
- Multiple

- National
- Privatisation of management
- Regional
- Single
- Uniformity or otherwise in management

5. PLANNING BODIES

- Authorities
- Interest groups/goodwill

6. OPTIMAL LAND OWNERSHIP

- Communal/public
- Military
- State/government
- Private
- Swopping of development rights
- When land is sold what happens

7. MANAGING PRESSURES OF URBAN DEVELOPMENT

- Development control/zoning
- Harbours/jetties
- Housing
- Industry
- Informal settlements
- Infrastructural Development - Road widenings
 - Telecommunications
- Promotion and limitation
- Satellite industries and accompanying infrastructure (eg fishing industry in Hout Bay)
- Tourism

8. EXCLUSION OF ALL DEVELOPED AREAS?

9. COMPATIBILITY WITH STRUCTURE AND GUIDEPLANS

- Amendment of
- Compliance with
- Ecological and social aspects
- Validity of

10. ZONING wrninsi THE CPPNE

- Clarity concerning rights
- Development rights
- Exchanging rights
- Lapsed rights
- Mountain zonation
- Multiple usage
- Present development rights
- Rezoning
- Servitude rights/rights of way

11. DATA AND INFORMATION

- Availability
- How accessed
- Where stored
- Who controls

12. LOCAL RECREATIONAL USES

- Hiking trail
- Law enforcement and control
- Mountain safety
- Paths
- Who, what, how, when? Mountain bikes, para-and hang-gliders, domestic animals, rock climbers, overnight accommodation, entertainment

13. DOMESTIC AND FOREIGN TOURISM

- Carrying capacity
- Limits to change
- Encourage or discourage
- Flow of money to management

14. CONSERVATION STATUS

- Flexibility
- Heritage site
- IUCN category
- Limited Development Area
- Multiple use status
- National/regional park - Legalities
- PNE

15. RESOURCE UTILISATION

- ® Abiotic: Mining, Quarrying, Use of old quarries
- ® Biotic: Vegetation - medicinal, cultural, initiation, research, flower picking; Fishing, Diving, Marine resources

16. WATER

- (i) ■ Alternative sources
 - Dams: Usage; Expansion/Reduction
- ® Essential uses
- Extraction; from groundwater
 - Quality
 - Riparian rights - use and extraction
- (ii) E Catchment management

17. BIODIVERSITY

- Biodiversity Convention
- Gene pool
- Pollinators etc.

18. INDIGENOUS VEGETATION

19. INDIGENOUS FAUNA

20. ALIEN VEGETATION

- Control/efficiency of methods used
- Eradication/is this necessary
- Historical trees
- Who pays
- Woodlots

21. PLANTATIONS

- Expansions
- Multiple use
- Removal
- Status quo

- Who benefits

22. **ALIEN FAUNA**

- Alien fish
- Hybrid cats
- o Tarrs

23. **WETLANDS AND RIVERS**

- ® Divided control
- Marinas

24. **MARINE ECOSYSTEMS**

- Exploitation of resources
- Intertidal/subtidal/etc. areas
- Marine reserves

25. **VISUAL QUALITY**

- Design
- External factors (eg flood lighting)
- icon
- Integrating scenic drives
- Services and infrastructure (eg pylons, masts, signage, buildings)
- View from sea
- View from land
- View from built environment
- View from natural environment
- Visual quality of natural environment (visual diversity, special definition)

26. **POLLUTION CONTROL WITHIN AND ADJACENT TO CPPNE**

- Air pollution: incineration
- Fresh water environment
- industrial effluent
- Landfill sites
- Littering
- Marine pollution
- Noise pollution

27. FIRE CONTROL

- Threat to plantations
- Urban risks
- Vegetation management

28. EROSION CONTROL

- x Extent
- Methods

29. HAZARDOUS AREAS

- Dunes
- Freak waves and rip currents
- Floodplains
- Quarries
- Rock falls
- Steep slopes (slumping)

30. MEETING SOCIAL NEEDS

- Firewood
- Grazing.
- Initiation
- Medicinal plant nursery
- Quarrying
- Subsistence agriculture

31. "CHERISHED" AREAS

- Archaeological
- Caves
- Cultural (NMC)
- Geological/paleontological features
- Historical features
- Religious structures
- Scientific

32. ACCESSIBILITY

- Adequacy of transport infrastructure
- Public transport to CPPNE

33. ACCESS

- Barrier-free design
- Cable cars
- On/to dams
- o Outspans
- Paths
- To cherished sites
- To Orange Kloof forest
- To Catchment areas
- Vehicular access

34. EDUCATION

- Awareness campaigns
- Enshrinement paradigm or ethic
- Expression of intent to educate
- Inculcating a sense of value to the CPPNE (seeing the mountain as an economic resource)

35. PUBLIC PERCEPTIONS

- Cultural values
- Promoting image
- Symbolic value

36. PUBLIC REPRESENTATION IN MANAGEMENT AND INPUT TO POLICY ISSUES

- How/What channels
- Name of Area
- Present bodies

37. SOURCES OF FINANCE FOR CPPNE MANAGEMENT

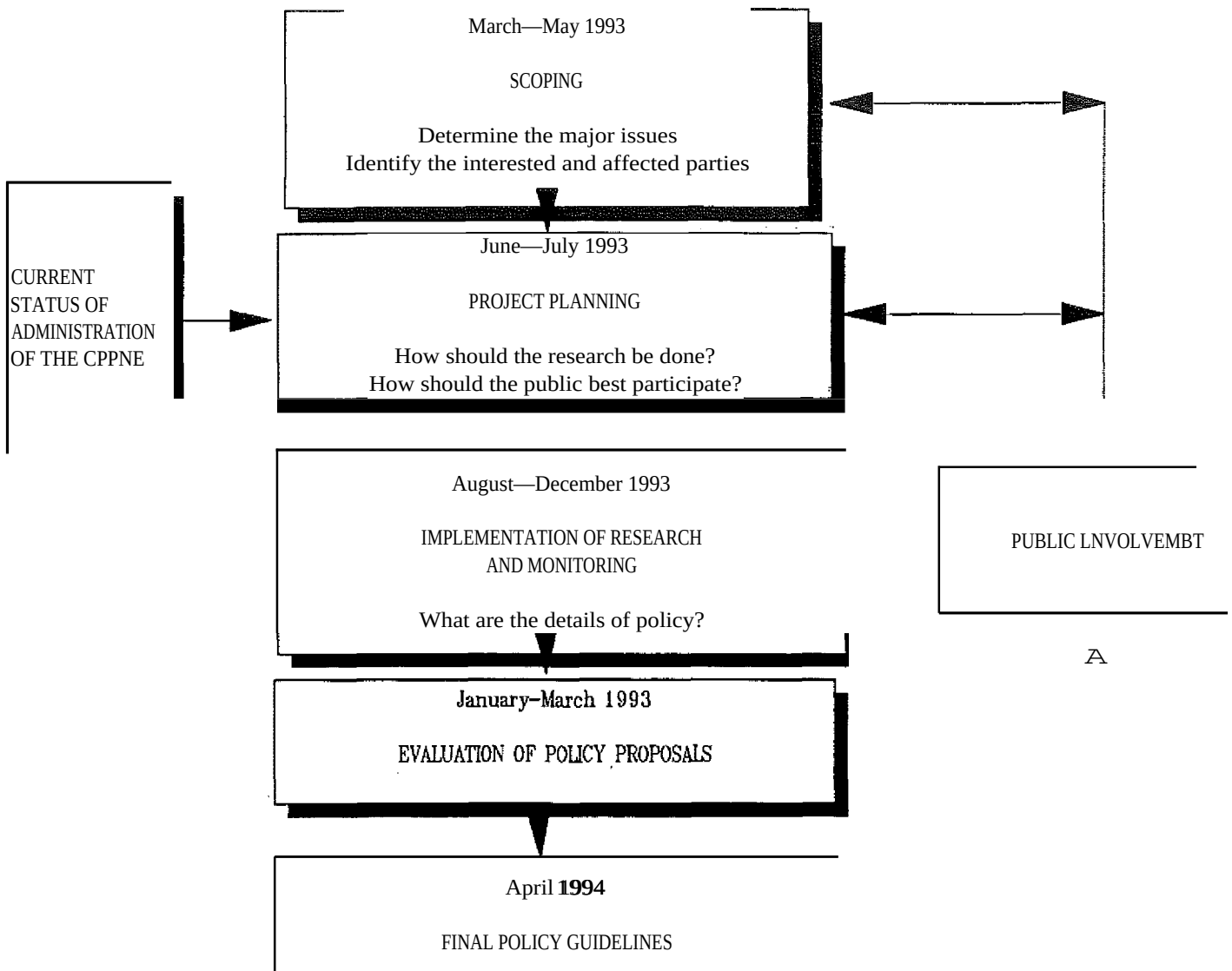
- Accounting and accountability
- Flow of money
- Goodwill/voluntary
- Grant
- Levies
- Permits
- Rates
- Rental
- Tax
- Tolls

- User pays

38. ADMINISTRATION OF FUNDS

Our ref policy.in (policies) rw

CPPNE: POLICY GUIDELINES PROJECT **DOCUMENT 2: BROAD PROJECT STEPS AND TIMING**



CPPNE: POLICY GUIDELINES PROJECT

DOCUMENT 3

LIST OF ORGANISATIONS

NGOs AND USER GROUPS

BOTANICAL SOCIETY OF SA
CAPTRUST
EARTHLIFE AFRICA
FAIREST CAPE ASSOCIATION
GREEN COALITION
HABITAT COUNCIL
MOUNTAIN CLUB OF SA
MUSLIM JUDICIAL COUNCIL
SOUTH PENINSULA ENVIRONMENT FORUM
WESTERN PROVINCE MOUNTAIN CLUB
WILDLIFE SOCIETY OF SOUTHERN AFRICA

LOCAL COUNCILS

CONSTANTIA VALLEY LOCAL COUNCIL
KOMMETJIE LOCAL COUNCIL
LLANDUDNO LOCAL COUNCIL
SCARBOROUGH LOCAL COUNCIL

POLITICAL AND COMMUNITY ORGANISATIONS

AFRICAN NATIONAL CONGRESS
AZANIAN PEOPLE'S ORGANISATION
CAPE AREAS HOUSING ACTION COMMITTEE
DEMOCRATIC PARTY
FOUNDATION FOR CONTEMPORARY RESEARCH
INKATHA FREEDOM PARTY
NEW UNITY MOVEMENT
PAN AFRICANIST CONGRESS
SOUTH AFRICAN COMMUNIST PARTY
SOUTH AFRICAN NATIONAL CIVICS ORGANISATION
WESTERN CAPE ECONOMIC DEVELOPMENT FORUM
WESTERN CAPE UNITED SQUATTERS ORGANISATION

WOMEN'S ALLIANCE
WORKER'S ORGANISATION FOR SOCIALIST ACTION

LABOUR ORGANISATIONS

CONGRESS OF SOUTH AFRICAN TRADE UNIONS
NATIONAL COUNCIL OF TRADE UNIONS

BUSINESS

AFRIICAANSE HANDELSINSTITUUT
CAPE TOWN CHAMBER OF COMMERCE
SMALL BUSINESS DEVELOPMENT CORPORATION
SOUTH AFRICAN PROPERTY OWNERS' ASSOCIATION
WESGRO

LOCAL AND REGIONAL AUTHORITIES

CAPE PROVINCIAL ADMINISTRATION
CAPE TOWN CITY COUNCIL
FISH HOEK MUNICIPALITY
SIMONSTOWN MUNICIPALITY
WESTERN CAPE REGIONAL SERVICES COUNCIL

CENTRAL GOVERNMENT DEPARTMENTS AND PARASTATALS

CAPE PENINSULA REGIONAL DEVELOPMENT ASSOCIATION
CAPTOUR
DEPARTMENT OF ENVIRONMENT AFFAIRS
DEPARTMENT OF MINERAL AND ENERGY AFFAIRS
DEPARTMENT OF PUBLIC WORKS
DEPARTMENT OF REGIONAL AND LAND AFFAIRS
DEPARTMENT OF WATER AFFAIRS
HOUSE OF DELEGATES
HOUSE OF REPRESENTATIVES
NATIONAL BOTANICAL INSTITUTE
NATIONAL MONUMENTS COUNCIL
NATIONAL PARKS BOARD
SOUTH AFRICAN DEFENCE FORCE
SAFCOL
SATOUR



Environmental Evaluation Unit

University of Cape Town Rondebosch 7700 • South Africa
Telephone: (021) 650-2866/7 • Telex 5-22208
Fax No: (021) 650-3791

CAPE PENINSULA MOUNTAIN CHAIN: POLICY PROJECT

CIRCULAR #2

To: All interested and affected parties

From: UCT CPPNE Project

Date: July 20. 1993

PLEASE DISTRIBUTE THIS INFORMATION AS WIDELY AS POSSIBLE, OR SEND US THE NAMES AND ADDRESSES OF ANY OTHER PARTIES WANTING TO RECEIVE THE INFORMATION

THIS CIRCULAR IS TO:

- GIVE THOSE OF YOU WHO DID NOT RECEIVE CIRCULAR #1 SOME **BACKGROUND INFORMATION** TO THE PROJECT (page 2);
- INFORM YOU OF **RESPONSES TO CIRCULAR #1** AND KEY CONCERNS WHICH WERE RAISED (page 3);
- **ADDRESS SOME OF THE CONCERNS** WHICH YOU HAVE BROUGHT TO OUR ATTENTION (page 6);
- LET YOU KNOW ABOUT THE **PRELIMINARY FINDINGS** OF THIS PROJECT (page 10);
- INFORM YOU OF THE **PROCESS** WE ARE FOLLOWING (page 11);
- LET YOU KNOW HOW YOU CAN **CONTRIBUTE** (page 14).

1. BACKGROUND INFORMATION

What is this project about?"

For those of you who did not receive Circular #1, this project is about developing policy for managing the use of the Cape Peninsula Mountain Chain: from Signal Hill to Cape Point. Much of the mountain chain falls into an area called the "Cape Peninsula Protected Natural Environment" (or CPPNE), which is currently managed by fourteen different government authorities, and involves as many as 180 private landowners. At the moment, there is no agreed framework within which these bodies manage the use of the mountain chain.

What is the aim of this project?

The aim of the project is, by April 1994, to have prepared a policy document which will allow present or new government structures to manage the area in a way that will be most beneficial to most people, over a long period of time.

Who is doing the project?

The University of Cape Town has been appointed by the Administrator of the Cape as the consultant for the project. The Cape Provincial Administration, the Cape Town City Council and the Western Cape Regional Services Council are paying for the work. The Environmental Evaluation Unit at UCT is administering the project and a range of UCT and, where necessary, non-UCT experts are providing input to the study. Ms Farieda Khan of the Environmental Advisory Unit is consulting community- and mass-based organisations. Ms Sue Lane of the Environmental Evaluation Unit is coordinating the project, with the assistance of Ms Rachel Wynberg, and under the guidance of Professor Richard Fuggle, Dr John Raimondo, and Professor Roy Siegfried.

2. WHAT WERE THE RESPONSES TO CIRCULAR #1?

Thank you very much for your responses to our last circular and comments on this project. Your comments and criticisms have been extremely valuable, and they are continuously informing the project.

(A note to those of you who did not receive Circular #1. We asked people to: comment on a draft overarching "vision" for the future management of the Cape Peninsula Mountain Chain; check a list of issues for consideration in this project; comment on the broad process for the project; and suggest organisations which should be involved in the project).

The main concerns expressed about the documents we sent out for comment were:

- that the language used in the draft "*VISION*" was too inaccessible and complex;
- that the **MAP** we included in the last circular was confusing, and did not show the existing boundaries of the PNE;
- that we need to explain clearly how this project fits in with **OTHER PROJECTS AND FORUMS** happening in Cape Town (eg Regional Structure Plans; the South African Nature Foundation's "Table Mountain Fund"; the Western Cape Economic Development Forum; the Peninsula Mountain Forum);
- that the **PUBLIC** must continue to be kept informed as to how and when they **will** participate in this project.

Other concerns which were brought to our attention were:

- that there are several areas in the Peninsula which should be given high priority for the clearing of alien invasive vegetation;
- that there are several areas in the Peninsula which are presently outside the PNE boundary **but**

Cape Peninsula Mondani Chain Policy Project: Circular 21

may need to be included in the CPPNE;

- that the existing 152m contour needs to be reviewed as a development limit;
- that the mountain should be zoned for multiple use, and not exclusively for nature protection;
- that the policy must be holistic, and should include the marine environment as well: "from crest-to-coast";
- that there should be a central, accessible data-base;
- that there should be a single, accountable, controlling authority with executive powers, full-time staff and public representation;
- that population growth predictions must inform policy;
- that Robben Island should be considered for inclusion in the protected area;
- that there should be an independent Cape Peninsula Mountain Trust Fund;
- that there should be no further development nodes in the Southern Peninsula;
- that safety on the mountain must be regarded as a key issue;
- that any proposed development in the Peninsula must be subject to Integrated Environmental Management Principles; and
- that there should be a moratorium on all proposed developments until this project's policy is decided upon.

PLEASE NOTE THAT THESE POINTS ARE IN ADDITION TO THE LIST OF ISSUES WE SENT YOU IN CIRCULAR #1. THESE ARE ALSO ONLY A **SUMMARY** OF KEY POINTS AND WERE GENERALLY RAISED BY MORE THAN ONE ORGANISATION.

All organisations you suggested should be invited to participate on this project have been added on to our list. We now have a list of more than 180 organisations who are involved in this project!

TO-DATE, WE HAVE RECEIVED WRITTEN AND VERBAL SUBMISSIONS ABOUT THIS PROJECT FROM MEMBERS OF THE FOLLOWING ORGANISATIONS:

African National Congress	Cape Bird Club
Cape Provincial Administration	Cape Town Chamber of Commerce
Cape Town City Council	Captrust
Catholic Welfare Development	Constantia Valley Local Council
Democratic Party	Fiennes Breakaways
Fish Hoek Alien Vegetation Control Group	Friends of the Liesbeek
Habitat Council	Kaapstad Sakekamer
Mountain Club of South Africa	National Parks Board
Peninsula Orienteering Club	Red Hill Landowners Conservation Group
Regional Development Advisory Committee	Regional Services Council
Silvermine River Society	Simon's Town Flora Conservation Group
Simon's Town Municipality	Small Business Development Corporation
South African National Civics Organisation	South African Ornithological Society
South Peninsula Environment Forum	Sunnydale Ratepayers Association
Table Mountain Aerial Cableway	Wildlife Society of Southern Africa

In addition, we have received 10 written responses from various individuals not associated with any particular organisation.

3. ADDRESSING YOUR CONCERNS ABOUT THE DOCUMENTS WE SENT YOU

A. SIMPLIFYING THE VISION

As you suggested, we have simplified the "vision" for the future management of the Cape Peninsula Mountain Chain (the area between Signal Hill and Cape Point). This vision is a SUGGESTION ONLY which has been drafted for you to comment on.

REVISED VISION

Table Mountain is a people's mountain. With its surrounding seas, it is important to the people of Cape Town, South Africa and the world.

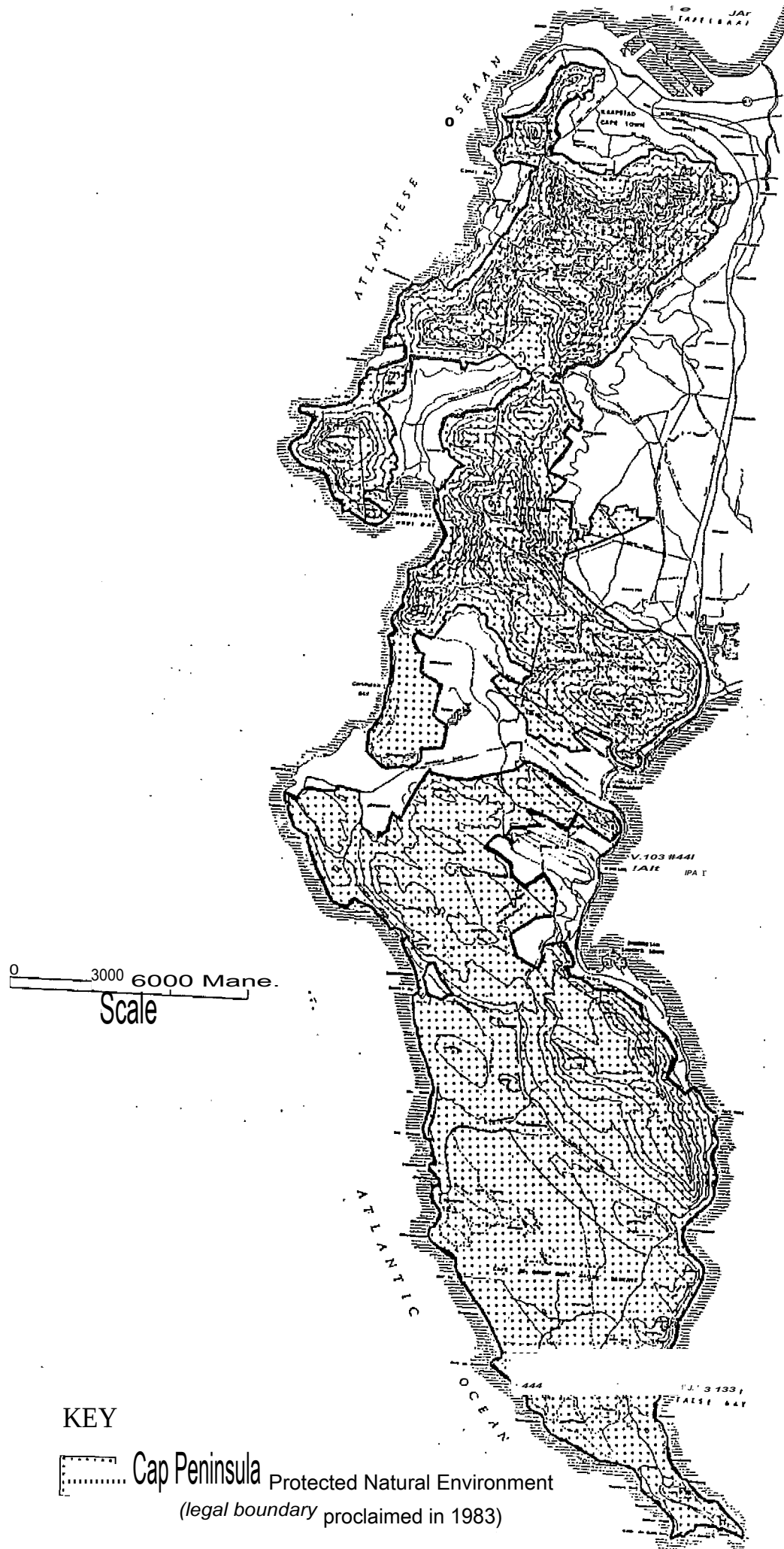
The mountain is loved for its beauty; for its plants, rocks and animals; and for the opportunities it provides for relaxation and tourism. It is the spiritual heart and economic pulse of the City.

These qualities must therefore be protected, to allow all people, as well as future generations, to enjoy the mountain and its benefits.

B. MAP SHOWING EXISTING BOUNDARIES OF THE CPPNE

Many of you asked us to provide a map of the existing boundaries of the CPPNE. This we have done, and it is shown on the next page. We would, however, like to emphasise that this project must be seen in the context of Metropolitan Cape Town. EVERYONE in the metropolitan area and beyond, would thus benefit from, and be responsible for, the achievement of the vision.

THE CAPE PENINSULA



0 3000 6000 Meters
Scale

KEY

 Cap Peninsula Protected Natural Environment
(legal boundary proclaimed in 1983)

C. HOW DOES THIS PROJECT FIT IN WITH OTHER PROJECTS HAPPENING IN CAPE TOWN?

There has been a lot of confusion about how this project fits in with all the other projects happening in Cape Town. This is hardly surprising; there are over 90 structure and local area plans on the go, and a whole range of initiatives trying to pull everything together. Because many of the projects have been commissioned by different authorities, at different times, and have different aims, making sense of it all is a difficult task. We hope that the diagram overleaf will help to clarify the role of this project in the whole scheme of things.

The diagram gives an indication of the interrelationships between different projects. At the regional level, the Metropolitan Development Framework (MDF) is intended to provide guidance for coordinated metropolitan, subregional and local area planning. The CPPNE, which itself needs to be informed by the development principles identified in the MDF, provides a similar "umbrella" for projects in the Peninsula, although its specific aim is to develop policy to manage the use of the mountain. Because many of the structure plans and development plans are looking at areas which abut and impinge on the mountain, final CPPNE policy should provide the guidelines for aspects of these plans.

There are several "independent" initiatives which also have relevance for the CPPNE policy project. The newly-formed Peninsula Mountain Forum is an umbrella for all non-governmental organisations concerned about the mountain chain. The "Table Mountain Fund", recently launched by the Southern African Nature Foundation aims to obtain R25 million to ensure that money is available to manage the mountain. The policy recommendations of this project are likely to determine its funding priorities. Finally, the CSIR has been developing a computer-based management system for the mountain chain, and while this information is unlikely to affect policy directly, it will be invaluable once a firm policy is in place.

An additional initiative which will impact on the formulation of planning and development policy in the Western Cape is the recent establishment of the Western Cape Economic Development Forum (WCEDF). The WCEDF is a broadly inclusive body with representatives from the major metropolitan "stakeholder" groupings, including business, labour, community and political organisations, development and service organisations, local and regional authorities, and central government departments and parastatals. While the Forum is not an executive body that can implement development projects, it provides a venue for broad discussion and consensus formation on development priorities and strategies.

WHERE DOES THE CPPNE POLICY PROJECT FIT IN?

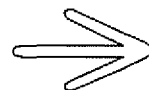
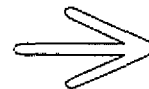
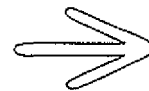
"INDEPENDENT" INITIATIVES

WESTERN CAPE ECONOMIC DEVELOPMENT FORUM
Participatory Forum for the MDF, CPPNE Policy Project
and many other initiatives

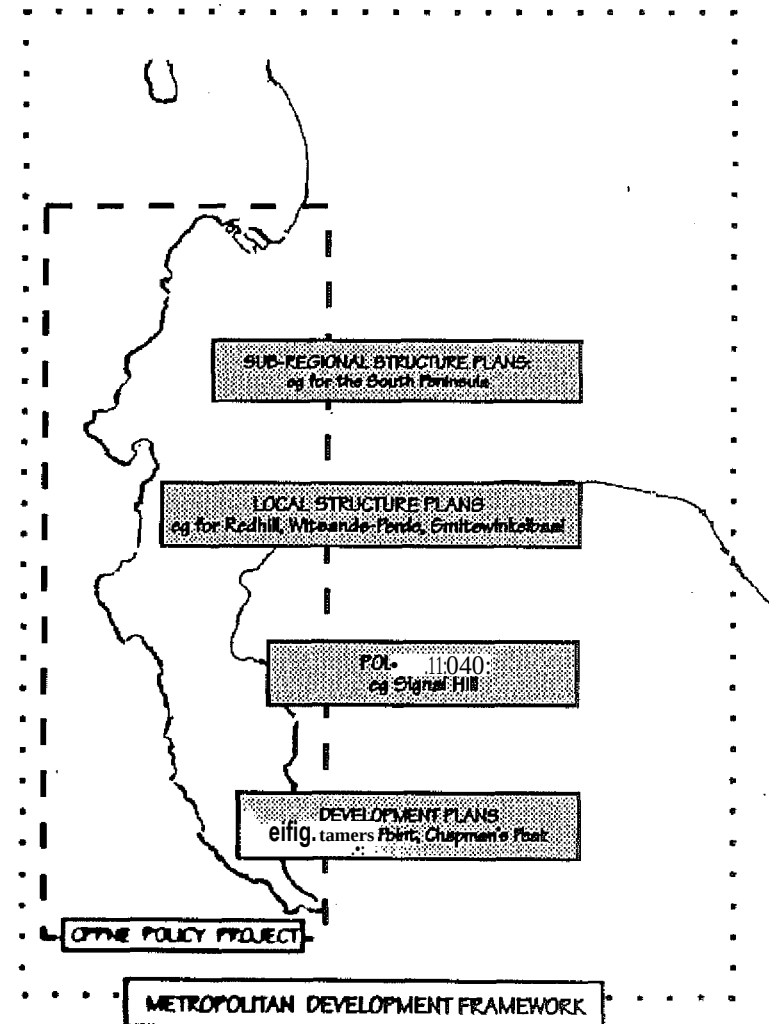
PENINSULA MOUNTAIN FORUM
Participatory Forum for the Peninsula Mountain Chain

SOUTHERN AFRICAN NATURE FOUNDATION
"Table Mountain Fund"

COUNCIL FEHC; & IEN17EIC AND kiptisirm. KESEAPCH
to nuns., mourrtalre



"GOVERNMENT" INITIATIVES



4. WHAT ARE OUR PRELIMINARY FINDINGS?

So far, there seems to be a good 'deal of consensus about many key issues. After considering your comments, and meeting with a range of people and organisations actively working in the management of the mountain chain, it seems that there is agreement that:

- there is no effective policy guiding management of the mountain chain;
- the legal basis for controlling activities in the PNE is inadequate;
- the present administrative system is fragmented and legally weak, preventing effective management;
- financial structures are not secure and lack accountability;
- there is a need to expand certain recreational and tourism facilities in the CPPNE.

There seems to be considerable backing for:

- a politically independent single, committed, accountable controlling body with executive powers, full-time staff and public representation;
- a technical arm of the controlling authority using local authorities to undertake day-to-day management;
- a changing of the boundaries of the CPPNE to include the continuity of landscape between sea and mountain crest;
- a zoning system for the mountain to allow for multiple use of the area. Grades of development and degrees of utilisation could vary from area to area, from "wild areas" to areas where limited development could be permitted.

NOTE THAT THESE ARE PRELIMINARY SUGGESTIONS BY INTERESTED PARTIES. SPECIFIC RECOMMENDATIONS OF THE PROJECT WILL ONLY BE MADE ONCE THE PUBLIC HAS PARTICIPATED FULLY. DETAILS OF THIS PROCESS ARE DESCRIBED BELOW.

5. WHAT PROCESS ARE WE FOLLOWING?

We anticipate that it will take us another three months to finish collating and interpreting information about the resources and uses of the mountain chain. By November 1993 we aim to have several policy models, or scenarios, for you to comment on. By April 1994 we should be able to recommend what policy should be adopted to attain the vision.

We have drawn up a pictorial flow chart to describe to you the process we will be following. A brief description of the flow chart follows.

Firstly, the above '**VISION**' is guiding the project. In short: the mountain chain must be protected to allow all people, as well as future generations, to enjoy the mountain and its benefits. Consultation with a range of people and organisations has allowed us to draw up the "vision" and identify key issues of concern which require policy.

The agreed '**FEATURES" OR "VALUES" OF = MOUNTAIN** which must be protected are: its physical features; biological diversity; water; symbolic aspects; cultural aspects; and its scenery.

We have brought a whole range of different specialists on board to draw these features of the mountain chain on a map, and show which areas may be more sensitive than other areas and why. We will then combine all this information and come up with a '**BASELINE SENSITIVITY MAP**'.

We will also be asking various groups of people to draw existing and proposed uses of the mountain chain on a map. These maps will show areas in the Peninsula which are and could be used for: afforestation, agriculture, recreation, tourism, urban development, veld harvesting, education and cultural purposes. We will then combine all this information and come up with a '**BASELINE USAGE MAP**'.

The reason for creating these two baseline maps is so that **ACTIVITY ZONES** can be mapped. By having activity zones, the mountain chain could be managed in such a way as to allow all people, and future generations, to enjoy its benefits. This can be done by promoting suitable types of activities in each zone. So for example, in the most "sensitive" areas, only hiking on well-constructed paths may be allowed. In less sensitive areas, mountain bikes may be allowed. And in areas which are already disturbed, such as pine forests, braaing and picnics may be permitted,

Cape Peninsula Mountain Chain Policy Project: Circular #2

At this stage, we do not know how many zones there would be, and what types of activities might be permitted in them. In all likelihood, there will be several possible options. Workshops will be held with interested user groups to work out which options would best attain the vision, and what policies would be required to achieve this.

For these activity zones to work properly, effective legal, administrative and financial structures will need to be in place. We will therefore be appointing legal and financial experts to look at existing and alternative structures, and to recommend what the best options would be.

For the **LEGAL AND ADMINISTRATIVE STUDY**, several mechanisms will be looked at, including: the existing PNE under the Environment Conservation Act; the National Parks Act; the National Monuments Act; the Paarl Mountain Act; the Regional Services Council Act; as well as international laws and the possibility of a new "Table Mountain Statute". The pros and cons of these laws will be assessed against a number of criteria. These include: accountability; public representation; financial security; powers of execution; efficiency

The **FINANCIAL STUDY** will look at ways of ensuring that funds to manage the mountain are secure; how much money the mountain chain could generate; and how this money should best be used in the metropolitan context. There will be close collaboration between the legal and financial specialists.

Once we combine all this information, we will have a number of scenarios. **FULL PUBLIC INVOLVEMENT** will be initiated at this stage, when we have something tangible and useful which the public can comment on. This information will be distributed as widely as possible: through public relations, radio, television, circulars and pamphlets. We will also be making a video about managing the mountain. Information will be communicated in three languages: English, Xhosa and Afrikaans. The public will be asked to consider policies which are in the greatest public interest.

After we have received and evaluated all responses from the public, the final policy document will be written. It is intended that the **FINAL REPORT** will be submitted to the public, the authorities, and the Management Advisory Committee of the PNE in April 1994.

"TABLE MOUNTAIN" POLICY PROJECT: PROCESS

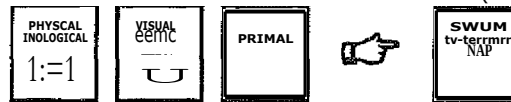
UCT RECEIVES PROJECT BRIEF FROM CLIENTS (February 1993)



LIST FEATURE5NALUE5 OF THE MOUNTAIN



MAPPING OF "SENSITIVE" AREAS OF THE MOUNTAIN (July 1993)



MAPPING EXISTING AND PROPOSED USES OF THE MOUNTAIN (July/A ust 1993)



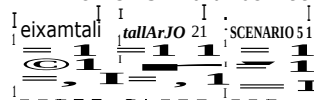
MAPPING PROPOSED ACTIVITY ZONES ON THE MOUNTAIN (5eFtamber 1993)



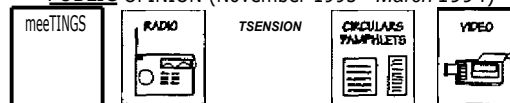
SELECTING MANAGEMENT TOOLS



DRAFT POLICIES November 1993)



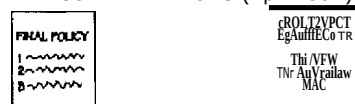
PUBLIC OPINION (November 1993 - March 1994)



EVALUATING PUBLIC COMMENTS



RECOMMENDATIONS (ApriI1994)



6. HOW CAN YOU CONTRIBUTE?

The UCT Research Team would really appreciate further comments from you about the project. In particular, we would at this stage welcome comments on:

- The revised "vision";
- The preliminary findings of the project;
- The process we are following.

A **PUBLIC MEETING** will be held on Tuesday 3 August 1993 to discuss the contents of this circular, and to clarify any other queries you may have. The meeting will be held at 17h30 at the University of Cape Town, Leslie Building, Lecture Hall 2C. Responses in writing will also be appreciated.

Another circular will be sent to all interested and affected parties in September 1993.

Should you have more questions, you are welcome to contact the project coordinators: Sue Lane or Rachel Wynberg at (021) 650-2866/7.

We look forward to your further participation in this project

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dr John Raimondo'. The signature is stylized with a large, looped initial 'D' and a long, horizontal stroke extending to the right.

Dr John Raimondo
Executive Committee Member



Environmental Evaluation Unit

University of Cape Town • Rondebosch 7700 • South Africa
" Telephone: (021) 650-2866/7 Telex 5-22208
Fax No: (021) 650-3791

CAPE PENINSULA MOUNTAIN SYSTEM: POLICY PROJECT

CIRCULAR #3

To: All interested and affected parties
From: UCT CPPNE Project
Date: November 29, 1993

PLEASE DISTRIBUTE THIS INFORMATION AS WIDELY AS POSSIBLE, OR SEND US THE NAMES AND ADDRESSES OF ANY OTHER PARTIES WANTING TO RECEIVE THE INFORMATION

Thank you very much for your responses to our last circular. We are at present integrating all the comments we have received into a draft report, which we hope to have available for your scrutiny and input in early February 1994. The report suggests policies and broad guidelines for managing the future protection and use of the Cape Peninsula Mountain System (which includes the Cape Peninsula Protected Natural Environment), as well as methods to implement the policies.

We are currently preparing a programme for involving the public more extensively in reviewing the draft report. Dates and venues of various meetings, and places where the report will be lodged (eg public libraries) will be circulated to you in January 1994. We will be preparing a popular version of the report, in English, Xhosa and Afrikaans.

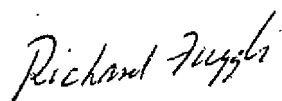
It is anticipated that the DRAFT REPORT will be available on 7 February 1994. Thereafter, six weeks (7 February 1994 - 21 March 1994) have been set aside for public response to the report. Please diarise these dates to ensure that your organisation can schedule time to respond.

After we have received and evaluated all your responses, the final policy document will be written. It is intended that the FINAL REPORT will be submitted to the Management Advisory Committee of the CPPNE in May 1994, and made available to the public and the authorities at the same time.

Should you have any questions, you are welcome to contact the project coordinators: Sue Lane or Rachel Wynberg at (021) 650-2866/7.

We wish you a happy and safe festive season.

Yours sincerely

A handwritten signature in black ink that reads "Richard Fuggle". The signature is written in a cursive, slightly slanted style.

Professor Richard Fuggle

For UCT: CPPNE PROJECT EXECUTIVE COMMITTEE



Environmental Evaluation Unit

University of Cape Town • Rondebosch 7700 . South Africa
Telephone: (021) 650-2866/7 Telex 5-22208
FOX No: (021) 650-3791

CIRCULAR #4

To: All interested and affected parties
From: UCT CPPNE Project
Date: 28 January 1994

**PLEASE DISTRIBUTE THIS INFORMATION AS WIDELY AS POSSIBLE, OR SEND
US THE NAMES AND ADDRESSES OF ANY OTHER PARTIES WANTING TO
RECEIVE THE INFORMATION**

As you are aware, we had by now hoped to have a draft report available for your input. In fact Circular #3 stated that this report would be available on 7 February 1994. Unfortunately, the amount of time we allocated for specialist involvement has been substantially longer than we anticipated. This, together with the upcoming elections, has meant that we had to modify the public participation programme.

The DRAFT report will now be available for public input from 13 April 1994. Taking cognisance of public holidays and election events we have allowed seven weeks for public response. Dates and venues of public meetings, and places where the report will be lodged (eg public libraries) will be circulated to you in early March 1994.

After we have received and evaluated all your responses the final document will be written. It is intended that the FINAL REPORT will be submitted to the Management Advisory Committee of the CPPNE in July 1994, and made available to the public and government authorities at the same time.

Should you have any queries, you are welcome to contact the project coordinators: Sue Lane or Rachel Wynberg at (021) 650-2866/7.

We apologise for this delay and hope that it will not cause you any inconvenience, or hinder your participation in the project.

Yours sincerely

?4w4

Professor Richard Fuggle
For UCT: CPPNE PROJECT EXECUTIVE COMMITTEE



Environmental Evaluation Unit

University of Cape Town Rondebosch 7700 • South Africa

Telephone: (021) 650-2866/7

Fax No: (021) 650-3791

TO: All Interested and Affected Parties
FROM: UCT CPPNE Project
DATE: 28 March 1994
RE: Publication of Draft Report

Please **distribute this information as widely as possible, or send us the names and addresses of any other parties wanting to receive information.**

On 28 January 1994 circular 4 was sent to you informing you that the draft report would be available for you from 13 April 1994. We also indicated that we would inform you about the dates and venues of the public meetings and where the report would be lodged. This letter provides this information,

1. PUBLIC PRESENTATIONS

PUBLIC MEETINGS HAVE BEEN SCHEDULED AS FOLLOWS:

Cape Peninsula

Date: Mon 9 May 1994
Time: 19h30
Venue: Hout Bay Museum
Andrew Road
Hout Bay

Date: Mon 23 May 1994
Time: 19h30
Venue: Cape Technikon
Lecture Theatre 2
Kaizergracht Road
Zonnebloem Campus

Date: Wed 19 May 1994
Time: 19h30
Venue: Ocean View Civic Centre
Carina Close
Ocean View

Date: Tues 24 May 1994
Time: 19h30
Venue: Claremont Civic Centre
cnr Main & Bath Roads
Claremont

m Cape Flats

Cape Flats' meetings are being organised by Farieda Khan of the Environmental Advisory Unit. She can be contacted at 6502866.

Additional, focused workshops will be held over the same period with key interested and affected parties such as: mountain managers, private landowners, commerce and tourism, environmental NGOs, recreation and sport organisations, environmental professionals, and political and civic groups.

2. WHAT THE REPORT WILL CONSIST OF

The report is divided into 3 parts:

- Volume 1 is the main report, and this will be distributed to all interested and affected parties on our data-base and to the libraries.

- Volumes 2 and 3 contain the technical appendices. These will be available in the reference section of public libraries in the Greater Cape Metropolitan Area, and at the Universities of the western Cape, Stellenbosch and Cape Town, The last part of this circular lists the addresses and telephone numbers of these libraries.

In addition to the above, a short popular report will be produced in Afrikaans, English and Xhosa and distributed as widely as possible.

Although we fully intend to meet our April deadline we would like to draw your attention to the fact that postal and delivery services and other events beyond our control may result in a few days delay in distribution to public venues and to the people and organisations on our database. Please do not hesitate to contact if you have not received your document by 18 April.

3. YOUR RESPONSES TO THE REPORT

In addition to hearing your opinions at the public meetings and workshops, we would like to receive your written comments. We would appreciate these as soon as possible, but no later than 3 June 1994.

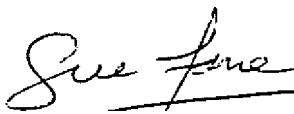
Comments should be addressed to:

CPPNE Project
Environmental Evaluation Unit
University of Cape Town
Private Bag
Rondebosch 7700
Fax: (021) 650 3791
Email: Wynberg@enviro.uct.ac.za

After we have received and considered all your responses the final document will be written. It is intended that the final report will be submitted to the Management Advisory Committee in July • 1994, and made available to the public and government authorities at the same time.

If you have any queries, you are welcome to contact the project co-ordinators: Sue Lane or Rachel Wynberg at (021) 650-2866/7.

Yours sincerely



fr,

Professor Richard Fuggle
For UCT: CPPNE PROJECT EXECUTIVE COMMITTEE

ADDRESSES:AND TELEPHONENUMBERS"OF LIBRARIES

ATHLONE
cnr Dobson & Klipfontein Roads
Athlone Tel: 6966250

Wesfleur Library
Wesfleur Circle
Atlantis Tel: (0226) 27618

ATLANTIS
Avondale Library
Avondale Civic Centre
Wesfleur Tel: (0226) 23529

BELHAR
Blouelie Circle
Belhar Tel: 9525807

BELHAR (cont.)
Huguenot Square Library
cnr Belhar Drive & Huguenot Square
Belhar Tel: 9523677

BELLVILLE
Carel van Aswegen Street Library
Bellville Tel: 9182300

Tyger Valley Centre Library
Bellville Tel: 9182117

Library in Kasselvlei Road
Bellville Tel: 9514370

BLOUBERGSTRAND
Andrew Foster Road
Bloubergstrand Tel: 561641

BONTEHEUWEL
Town Centre
Blue Gum Street
Bonteheuwel Tel: 6944684

BOTHASIG
Shoprite Centre
Vryberger Avenue
Bothasig Tel: 585529

BRAKENFELL
Paradys Street
Brakenfell Tel: 9811819

BROOKLYN
Martin Adams Hall
Brooklyn Tel: 5115489

CAMPS BAY
The Drive
Camps Bay Tel: 4381511

CENTRAL
City Hall
Darling Street
Cape Town Tel: 4624400

CLAREMONT
Civic Centre
Main Road
Claremont Tel: 616993

J Bourhill Library
Peffer's Street
Claremont Tel: 618252

DELFT
cnr Delft, Main Road & Voorbrug Road
Delft Tel: 954-1625

DURBANVILLE
Durban Road
Durbanville Tel: 964460

EERSTERIVIER
cnr Melkhout & Fynbos Streets
Melton Rose
Eersterivier Tel: 9041654

ELSIES RIVER
Adriaanse Library
Adriaanse Avenue
Elsies River Tel: 932-2322

Elsies River Civic Centre
Halt Road
Elsies River Tel: 9323690

Library in 12th Avenue
Elsies River Tel: 9326040

FISH HOEK
Central Circle
Fish Hoek Tel: 7821162

GOODWOOD
cnr of MacDonald & Voortrekker Roads
Goodwood Tel: 5917269

GORDON'S BAY
Berg Street
Gordon's Bay Tel: (024) 561825

GRASSY PARK
Cnr 5th Avenue & Library Lane
Market Square
Grassy Park Tel: 7062267

GUGULETU
Uluntu Centre
NY108
Guguletu Tel: 6332521

HANOVER PARK •
cnr Hanover Park Ave & Surran Road
Hanover Park Tel: 6919915

HEIDEVELD
Heideveld Road
Heideveld Tel: 6375432

HOSPITALS
Groote Schuur Hospital
Observatory Tel: 4043159

HOUT BAY
Hangberg Library
Bay View Road
Hout Bay Harbour
Hout Bay Tel: 7903060

HOUT BAY (cont.)
Library in Melkhout Crescent
Hout Bay Tel: 7902150

KENSINGTON
cnr 11th Ave & Factreton Ave
Kensington Tel: 5931830

KEWTON
Avenue Dr Abdurahman
Kewton Tel: 6376970

KOMMETJIE
Somerset Road
Kommetjie Tel: 7831848

KRAAIFONTEIN
Brighton Road
Kraaifontein Tel 9881164

Scottsdene Library
Loan Avenue
Scottsdene
Kraaifontein Tel: 9887469

KUILSRIVER
Carinus Street
Kuils River Tel: 9033111

LANGA
Cnr of Mandy & Moffet Streets
Lange Tel: 6941868

LANSDOWNE
Church Street
Lansdowne Tel: 7624671

LENTEGEUR
Civic Centre
Merridale Avenue
Lentegeur Tel: 310630

LINGULETHU WEST - **KHAYALITSHA**
Bonga Drive
Khaylitsha Tel: 3615159

LOTUS RIVER
cnr 6th Avenue & Buck Road
Lotus River Tel: 7063793

MACASSAR
Bind Avenue
Macassar Tel: (024) 571010

MAITLAND
Town Hall
Maitland Tel: 5114573

MANENBERG
Sabie Road
Manenberg Tel: 6910140

MEADOWRIDGE
Howard Drive
Meadowridge Tel: 729382/3

MELKBOSSTRAND
Koeberg Library
Merchant Walk
Duynefontein Village
Melkbosstrand Tel 5532514

MILNERTON
Pienaar Road
Milnerton Tel: 522000

MOWBRAY
Main Road
Mowbray Tel: 6891201

MUIZENBERG
Atlantic Road
Muizenberg Tel: 7885263

OBSERVATORY
Lower Station Road
Observatory Tel: 479017

OCEAN **VIEW**
Carina Close
Ocean View Tel: 7831887

PAARL
Main Street
Paarl Tel: (02211) 22815

PAROW
cnr of MacKintyr & 1st Avenue
Parow Tel: 9388121

PINELANDS
Howard Centre
Pinelands Tel: 5314658

PLUMSTEAD
The Village SqUare
Yudelman Lane
Plumstead Tel: 7977240

RETREAT
Concert Boulevard
Retreat Tel: 7011156

ROCKLAN DS
Civic Centre
Park Avenue
Rocklands Tel: 324109

RONDEBOSCH
Town Hall
Rondebosch Tel: 6891100

SEA POINT
Regent Road
Galleria
Main Road
Sea Point Tel: 4340031

Civic Centre
Three Anchor Bay Road
Sea Point Tel: 4397440

SIMON'S TOWN
St George's Street
Simon's Town Tel: 7861553

SOMERSET WEST
Victoria Street
Somerset West Tel: (024) 852235

STELLENBOSCH
Plein Street
Stellenbosch Tel: 8088154

SOUTHFIELD
cnr Casino & Victoria Roads
Southfield Tel: 7979551

STRAND
Mill Street
Strand Tel: (024) 31796

STRANDFONTEIN
cnr Dennegeur Ave & Welgelegen Rd
Strandfontein Tel: 332112

TAFELSIG
cnr Kilimanjaro & Pyrenees Streets
Tafelsig Tel: 3973175

TAMBOERSKLOOF
Kloof Street
1 22b Kloof Street
Tamboerskloof Tel: 243308

TOKA I
Tokai Road
Tokai Tel: 758550

VREDEHOEK
cnr Derry Street & Gladiolus Avenue
Vredehoek Tel: 3973175

WESTRIDGE
Civic Centre
Wespoort Road
Westridge Tel: 323720

WOODSTOCK
Town Hall
Woodstock Tel: 4176426

WYNBERG
Maynardville
Wynberg Tel: 7622877

WELLINGTON
Jan van Riebeck Street
Wellington Tel: (02211) 31121

TERIARY INSTITUTIONS

UNIVERSITY OF CAPE TOWN
Jagger Library
UCT Tel: 6503097

UNIVERSITY OF STELLENBOSCH
JF Gericke Library
University of Stellenbosch Tel: 8874872

UNIVERSITY OF THE WESTERN CAPE
Main Library
UWC Tel: 9592900



Environmental Evaluation Unit

University of Cape Town • Rondebosch 7700 • South Africa
Telephone; (021) 650-2866/7 . Telex 5-22208
Fax No: (021) 650-3791

DRAFT POLICY FOR MULTIPURPOSE USE OF THE CAPE PENINSULA

TO: All Interested and Affected Parties
FROM: UCT CPPNE Policy Project
DATE: 13 May 1994
RE: Public Meetings

Please distribute this information as widely as possible, or send us the names and addresses of any other parties wanting to receive information.

We sent you Circular #5 on 28 March stating where and when UCT would present their recommendations on the *"Draft Policy for the Multipurpose Use of the Cape Peninsula"*. This circular is to remind you:

- (a) when the remaining public meetings are to be held. Please inform as many people and organisations as possible so that they may avail themselves of the opportunity to have issues of interest clarified; and,
- (b) that comments on the documents should be submitted, in writing by 3 June 1994, to the CPPNE Project, EEU, UCT, Rondebosch, 7700.

PUBLIC MEETINGS

Date: Monday 23 May 1994

Time: 19h30

Venue: CAPE TECHNIKON

Lecture Theatre A.
Kaizergracht Road
Zonnebloem Campus

Date: Tuesday 24 May 1994

Time: 19h30

Venue: CLAREMONT CIVIC CENTRE

cnr Main & Bath Rds
Claremont

Thank you for your support of and interest in the project.

Yours sincerely

?I'n⁴

Professor Richard Fuggle
For: UCT: CPPNE Policy Project



Environmental Evaluation Unit

University of Cape Town • Rondebosch 7700 • South Africa
Telephone: (021) 650-2866/7
Fax No: (021) 650-3791

7 July, 1994

Dear Interested & Affected Party

Thank you very much for commenting on the Draft Policy for Multipurpose Use of the Cape Peninsula.

We have had a tremendous response to the draft report, and are at present consolidating all the comments received. In general, comments have been extremely varied, ranging from broad policy issues to those more concerned with detailed management. Key concerns you have raised with regard to policy will, where appropriate, be incorporated into the final report. Concerns you have raised with regard to detailed management will be passed on to our client and further considered when management plans are drafted. All response forms and comments will be kept on a permanent file by our client.

A summary of your key concerns about, and responses to, the policy issues will be prepared for distribution with the final report. This report will be submitted to both the public and the premier of the Western Cape Province in July 1994.

We thank you for your interest and fruitful involvement in this investigation.

Sincerely

1, k4e1

/s/ Professor Richard Fuggle

<d:\cppne\kips\response.doc>(rw)09-06-94

6. COMMENTS RECEIVED FROM INTERESTED AND AFFECTED PARTIES PRIOR TO THE DISTRIBUTION OF THE RIL 1994 DRAFT POLICY REPORT

(compiled by the University of Cape Town)

PART A: COMMENTS RECEIVED FROM INTERESTED AND AFFECTED PARTIES ON THE CPPNE POLICY INVESTIGATION

1. VISION

1.1 INITIAL VISION (Circular #1, 22 April 1993)

The vision language needs to be simpler.

(Representative from a civic organisation: CPPIYE Interviews: 26-28 April 1993).

The vision has too much jargon and probably will not be understood by the general public.

(Silvermine River Society: comments on Circular 1: no date; Mr P. Gray, Captrust: Commenting on Circular 1: 30 April 1993; Ms L. Jackson, Department of Environmental Affairs: comments on Circular 1: 24 April 1993; Mr IL C. Taylor: comments on Document 1 of Circular 1: no date; Mr C.H. Langley: letter commenting on Circular 1: 28 May 1993).

The vision is too 'technical' for a vision. We need something which will encourage a feeling of stewardship for the mountain.

(Silvermine River Society: comments on Document 1 of Circular 1: no date).

The vision could also include *'its continued use by all people for relaxation, recreation, instruction and aesthetic appreciation'*.

(Mr IL C. Taylor: comments on Document 1 of Circular 1: no date).

The vision should be broader.

(Mr P. Gray, Captrust: comments on Document 1 of Circular 1: 30 April 1993).

The protection of the biodiversity is not included in the vision, and nature conservation is not included as a use.

(Ian Macdonald: CPPIYE Public Meeting: 3 August 1993)

The vision should include problems.
(Representative from a civic organisation: CPPNE Interviews: 26-28 April 1993).

The vision should define the process.
(Representative from a civic organisation: CPPIYE Interviews: 26-28 April 1993).

The vision should include development aspects.
(Representative from a civic organisation: CPPNE Interviews: 26-28 April 1993).

The vision should be modified to emphasise the local context.
(Representative from government conservation department: CPPNE Interviews: 26-28 April 1993).

In the vision, it is important that the Table Mountain should be seen in its metropolitan context.
(Representative from government conservation department: CPPNE Interviews: 26-28 April 1993).

The fact that Table Mountain is one of the most important national assets should be included in the vision.
(Representatives from local conservation organisation: CPPNE Interviews: 26-28 April 1993).

The 'Mountain chain' concept should be broadened to encompass the Peninsula (including the beaches).
(Representatives from local conservation organisation: CPPNE Interviews: 26-28 April 1993).

The vision must see the mountain in the context of its surroundings.
(Representatives from local conservation organisation: CPPNE Interviews: 26-28 April 1993).

The mountain should be managed in an integrated manner for: nature protection, ecotourism, recreation and environmental education. *
(Representative from national conservation organisation: CPPNE Interviews: 26-28 April 1993).

The document and vision is too focused on natural resources.
(Representatives from a local council in the Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

The overarching vision does not incorporate the urban design concept.
(Representatives from a local council in the Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

The vision is rather 'woolly'. It should state the responsibility of all to look after the CPPNE.
(Member of the Public: South Peninsula Environmental Forum Public Meeting: 25 August 1993).

* indicates a cross-referral to another section

The word 'spiritual' implies a religious context and may be offensive to religious groups. Emotional may be a better word.

(Mr P. Britton, Cape Town City Council: official comments on Circular 1: 25 June 1993).

The primary focus of the vision should be on preserving the environment and the secondary focus should be on providing a public amenity.

(Municipality in the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

Although the vision is supported in general, the following change in the first sentence is proposed: 'These qualities must therefore be protected AND ENHANCED IN A SUSTAINABLE WAY, to allow...°

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Comments from meeting about CPPIYE Project: 8 September 1993).

The following change in the second sentence of the vision of the third paragraph is also proposed: 'for its plants, WATER, rocks, and animals;..'

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Comments from meeting about CPPIYE Project: 8 September 1993).

The vision should not only include Table Mountain but the whole 'chain' .

(Comments from the Managers Forum Meeting: 28 July 1993).

1.2 REVISED VISION (Circular #2, 20 July 1993)

The revised 'vision' is considerably from. It is clear and simple and can be understood and identified with people of all walks of life.

(Mr C.H. Langley, Conservation Division of Western Cape Regional Services Council: letter in response to letter 7 September 1993 from the CPPNE Project: 15 September 1993).

Consideration should be given to the second sentence which mentions the 'surrounding seas' - the surrounding urban landscape is equally important to the local, national and international community.

(Mr C.H. Langley, Conservation Division of Western Cape Regional Services Council: letter in response to letter 7 September 1993 from the CPPPIE Project: 15 September 1993).

The revised vision is deemed acceptable.

(Regional Representative, Department of Public Works: Letter to Professor B.F. Fuggle in Response to letter 7 September 1993: 5 October 1995)

The wording of the vision is too 'popular' and lacking in gravitas. The Phrase 'a people's mountain' seems rather meaningless, perhaps even dangerous if it is seen as encouraging a belief that people can do as they please with the mountain.

(Graeme Binckes: letter in response to Circular #2: 16 August 1993).

An alternative vision could be:

'Table Mountain and the Cape Peninsula Mountain Chain, together with the surrounding seas, are of great value to the people of Cape Town, South Africa and the world. The commanding presence of the mountain lends a special character to Cape Town; they

• Indicates a cross-referral to another section

are the spiritual heart and economic pulse of the city, providing opportunities for recreation and tourism and a habitat for plants and animals. These qualities must be protected, now and in the future, if the mountains are to be widely used and enjoyed. (Qraeme Binckes: letter in response to Circular #2: 16 August 1993).

2. PROJECT PROCEDURE

UCT should recommend a PROCESS that ensures that the policy happens. (Mr P. Britton at CPPIYE Public Meeting: 3 August 1993).

The policy document should include procedures so that the exercise could be repeated at a later stage if necessary. (Member of public at CFPNE Public Meeting: 3 August 1993).

There is a need for the public to be involved at an earlier stage, that is, before August 1993. (Silvermine River Society: comments on Document 2 of Circular 1: no date).

The public should be allowed to give input to determine the public participation procedure. (Silvermine River Society: comments on Document 2 of Circular 1: no date).

The steps and timing look good but suggest that the timing is a bit ambitious. (Mr E. Tilanus, representing South African Ornithology Society, Cape Bird Club and Friends of the Liesbeek: letter commenting on Document 2 of Circular 1: 21 June 1993).

The process being followed is the only way that a policy for planning, development and management of the CFFNE can be produced. (Mr C.H. Langley, Conservation Division of Western Cape Regional Services Council: letter in response to letter 7 September 1993 from the UTNE Project: 15 September 1993).

There needs to be more time to prepare the policy in the 'new South Africa'. (Representative of national conservation organisation: CPPNE Interviews: 26-28 April 1993).

The method used for the study was too complicated for the person in the street to understand and something less complicated might work better. (Member of the Public: South Peninsula Environmental Forum Public Meeting: 25 August 1993).

A comprehensive approach to the project is essential, mainly to coordinate all initiatives under one umbrella, and to involve all interested and affected parties through a participative process. * (Dr A. Hall-Martin, Executive Director: Southern Parks, National Parks Board: letter to Professor R.F. Fuggle in response to letter of 7 September 1993: 4 October 1993).

This study is being done at the wrong time. (Representative of civic organisation: 26-28 April 1993).

. Indicates a cross-referral to another section

The process being followed is deemed acceptable.

(Regional Representative, Department of Public Works: letter to Professor R.F. niggel in response to letter 7 September 1993: 5 October 1993; John Winter, Curator of Kirstenbosch National Botanical Garden: letter to Professor B.F. niggel commenting on Circular 2: 22 October 1993).

The process being followed by the Environmental Evaluation Unit is the correct one.

(Mr ILK. Chapman, Chief Executive/Town Clerk, Fish Hoek Municipality: Letter responding to letter 7 September 1993: 14 September 1993).

Technical liaison between the planning teams responsible for the Metropolitan Development Forum, CPPNE Policy Plan, South Peninsula Sub-regional Plan and Action Programme needs to be accomplished to ensure proper coordination between the various policy and/or development/conservation proposals.

(Committee for Land Usage and Transport Planning Western Cape Regional Services Council: Comments from meeting about CPPNE Project: 8 September 1993).

Population growth predictions must inform policy.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPNE Project by Chief Executive Officer: 8 September 1993).

In the CPPNE workshop on options for land-use zones, it is important to include private landowners who may have required property before the current resource-based analysis was started, and whose present or envisaged activities may be precluded by the new vision for the mountain chain.

(Mr If. Paton, City Planner, Cape Town City Council: letter commenting on Circular 2: 17 November 1993).

It is considered that the legal, administrative and financial structures cannot be effectively set up until such time as the resource-based analysis has been completed, as only then will a more in-depth understanding of the issues and possible ways of dealing with them be available.

(Mr IL Paton, City Planner, Cape Town City Council: letter commenting on Circular 2: 17 November 1993).

The process is considered deficient with respect to public consultation. It is suggested that the first round of public comment should be after Step 4: Mapping existing and proposed uses of the mountain, in order to receive public guidance on identifying activity zones. *

(Mr If. Paton, City Planner, Cape Town City Council: letter commenting on Circular 2: 17 November 1993).

UCT should provide the strategy required to ensure that the guidelines are implemented.

(Comments from the Managers Forum Meeting: 28 July 1993).

The preliminary findings are acceptable.

(Regional Representative, Department of Public Works: letter to Professor RF niggel in Response to letter 7 September 1993: 5 October 1993).

* Indicates a cross-referral to another section

The language used in the documentation is too technical and presupposes a scientific background. The language needs to be understandable.
(Representative of a civic organisation: 26-28 April 1993).

People's expectations of CPFTIE policy are high. There is little understanding of what policy guidelines exactly are.
(Mr A. Gubb, Wildlife Society at CPPIYE Public Meeting: 3 August 1993).

It should be made clear to the public that the recommendations still have to be implemented.
(Mr A. Clubb, Wildlife Society at CPPIYE Public Meeting: 3 August 1995).

The technical details of the project should be documented so that the people of Cape Town have the information should they want it.
(Member of public at CPPIYE Public Meeting: 3 August 1993).

The study should be limited to issues related to the undeveloped areas and not issues that pertain to the entire peninsula.
(Ms L. Jackson, Environmental Monitoring Group: comments on Circular I: 24 April 1995).

There could then be section that examines the CFPNE's interrelationship with adjacent developed areas.
(Ms L. Jackson, Environmental Monitoring Group: comments on Circular 1: 24 April 1993).

There needs to be a detailed description of the UTNE area and its resources, an outline of what the potential benefits are, and then the emphasis should be on how to allow public utilisation of the resources, on a sustainable basis.
(Ms L. Jackson, Environmental Monitoring Group: comments on Circular I: 24 April 1993).

The task of this group should be to draw up a draft resource usage and management plan proposal, which would go back to the public for comment and thereafter implementation.
(Mr D. Wightman, Plants Cape (PTY) Ltd• letter: 29 July 1993).

Although the University of Cape Town's study was not aimed at providing a management plan, its development should be strongly motivated for.
(Mike van Weiringen, Consulting Geotechnical Engineer and Engineering Geologist: letter to Sue Lane in response to Circular 2: 8 November 1993).

There is a perception among managers that the University of Cape Town is doing scenario planning rather than producing fixed policy.
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

With regard to the statement 'there is no effective policy guiding management of the mountain chain' it could be better to state 'there is a need to provide improved policy guiding management of the mountain chain'.
(Chief Executive/Town Clerk, Municipality of 81111017'S Town: Letter to Professor RP Fuggle in response to his letter the 7 September 1993: 21 October 1993).

The policy must be holistic, and should include the marine environment as well: from crest to coast'.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

The concept of a holistic policy covering the chain from crest to coast° is appreciated (especially for Fish Hoek which has one of its present boundaries being formed by the Silvermine River and the degradation which has taken place along the banks of this river over the last few years).

(Mr H.K. Chapman, Chief Executive/Town Clerk, Fish Hoek Municipality. • Letter responding to letter 7 September 1993: 14 September 1993).

A comprehensive approach to the project is essential, mainly to coordinate all initiatives under one umbrella, and to involve all interested and affected parties through a participative process.

(Dr A. Hall-Martin, Executive Director: Southern Parks, National Parks Board: letter to Professor B.F. Fuggle in response to letter of 7 September 1993: 4 October 1993).

A public steering committee/forum should be formed to ensure adequate public involvement.

(Silvermine River Society: comments on Document 1 of Circular 1: no date; and member of public at CPPIYE Public Meeting: 3 August 1993).

Concern is expressed that University of Cape Town will be asking for public COMMENT rather than full public participation.

(Member of public at CPP/YE Public Meeting: 3 August 1995).

Concern is expressed that the members of the public will be bombarded with information at the 'draft policy' stage.

(Member of public at CPPIYE Public Meeting: 3 August 1995).

The public should be brought in at the mapping stage.

(Member of public at CPPIYE Public Meeting: 3 August 1993).

Community needs should override individual needs.

(Mr A. Gubb, Wildlife Society, Western Cape Branch: letter: 27 April 1993).

Broader representation needs to be obtained.

(Member of public at CPPIYE Public Meeting: 3 August 1993).

There is not enough public involvement in developing the documentation.

(Mr A. Qubb, Wildlife Society, at CPPIYE Public Meeting: 3 August 1993).

There needs to be total public participation in any decision affecting CPPNE.

(Mr A. Gubb, Wildlife Society, Western Cape Branch: letter: 27 April 1993).

More public meetings need to be held. The Cape Times should have a loose page containing suggestions about the proposals for the CPPNE policy guidelines (eg funding options, public and recreational facilities, footpaths, sewage, viewing sites, etc).

(Ms S. Louw: letter to Environmental Evaluation Unit: no date).

* Indicates a cross-referral to another section

The procedure of establishing a single controlling body for the CPPNE needs to be done in a transparent way, so that there is wide support in the community at large and it will be seen as a democratic initiative.

(Mr A. Starke: letter to Professor R.F. Puggle in response to article in Argus on 9 August 1993: 4 August 1993).

The Peninsula Mountain Forum aims to be a structure that facilitates the full public participation in planning and decision-making regarding the CPPNE.

(Diana F. Wilson: letter to Rachel Wynberg in response to Circular 1 and the press release of 13 May 1993: 23 June 1993).

The national recognition of Table Mountain needs to be bolstered and the Wildlife Society could be a mechanism to do this.

(Mr A. Cribb, Wildlife Society of the Western Cape: CPPIYE Interviews: 26-28 April 1993).

Zoning* on the mountain requires extensive public participation.

(Member of public at CPPIYE Public Meeting: Tuesday 3 August 1993; and Mr P.E. Bignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

Public pressure should be used in preventing mining* in the CPPNE.

(Mr P.E. Bignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

There needs to be better and more frequent communication with the public. It should be done by someone or an agency who is capable of good communication, unlike that of the press release of 13 May 1993.

(Diana F. Wilson: letter to Rachel Wynberg: 25 June 1993).

There needs to be better communication between users and management. Users should be allowed to be involved in determining what their needs are.

(Professor C.L. Merry, Department of Survey and Geodetic Engineering, UCT: letter to Professor R.F. Puggle in response to article in Argus on 9 August 1993: 18 August 1993).

There should be public participation in the planning process.

(Mr F.A. Fehrson, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1995).

The communication process with communities should entail talking in simple terms rather than giving them things to read.

(Representative of a civic organisation: CPPIYE Interviews: 26-28 April 1995).

The politics of the environment are fundamental (eg Driftsands) and should not be overlooked.

(Representative of a civic organisation: CPPIYE Interviews: 26-28 April 1995).

Communities need to understand that the mountain chain affects everyone.

(Representative of a civic organisation: CPPIYE Interviews: 26-28 April 1993).

It is the responsibility of policy-makers (ie University of Cape Town) to inform the public of all issues.

(Mr A. Gubb, Wildlife Society, Western Cape Branch: letter: 27 April 1993).

* Indicates a cross-referral to another section

it is crucial to involve the youth. The consultants should therefore take the project to the youth.

(Member of public at CPPIYE Public Meeting: 3 August 1995)

A questionnaire should be placed in the newspaper in order to obtain broad public input.

(Member of public at CPPIYE Public Meeting: 3 August 1993).

Advertisements should be put in the media to call for other NQOs and user groups who are interested to participate.

(Mr E. 77Ianus, representing S.A. Ornithology Society, Cape Bird Club and Friends of the Liesbeek: letter commenting on Document 3 of Circular 1: 21 June 1993).

Sporting bodies* should be consulted.

(Mr C. Goldschmidt, committee member of Peninsula Orienteering Club: letter commenting on Document 3 of Circular 1: 12 May 1993).

Horse riders* need to be included as users and consulted.

(D. Marshall, Secretary Sunnydale Ratepayers Association: letter commenting on Circular 1: 14 June 1993).

Public input is crucial re: amendments of the boundaries*.

(Member of public at CPPIYE Public Meeting: 5 August 1993).

The public could be used in the planning process of the improvement of paths. `

(Ms S. Louw: letter to Environmental Evaluation Unit: no date).

There needs to be public involvement in determining the boundaries'.

(Comments from meeting with the Western Cape Regional Services Council: March 12 1993).

There needs to be public involvement concerning the allocation of funds'.

(Mr E Britton, Cape Town City Council: official comments on Circular 1: 25 June 1993).

When the public is asked to consider the policies, it is important for them to know whether the whole CPPI15 will be self-financing or whether certain areas will be subsidised, as this may significantly affect the public's opinion of which policies are in the greatest public interest. *

(Mr IL Paton, City Planner, Cape Town City Council: letter commenting on Circular 2: 17 November 1993).

The process is considered deficient with respect to public consultation. It is suggested that the first round of public comment should be after Step 4: Mapping existing and proposed uses of the mountain, in order to receive public guidance on identifying activity zones.

(Mr H. Paton, City Planner, Cape Town City Council: letter commenting on Circular 2: 17 November 1993).

• Indicates a cross-referral to another section

There is concern and anxiety on the part of the public that the Kahn Commission will complete its work and report directly to the Administrator without any public participation.

(Member of public at CPPNE Public Meeting: 3 August 1993).

The people of Cape Town are all major stakeholders in the UTNE and have a right to be involved in the rationalisation plans.

(Mr A. Gubb, Wildlife Society, Western Cape Branch: in letter to Advocate P. Kahn, Chairman of the Rationalisation Working Group: 10 August 1993).

The Rationalisation Working Group should join the UCT study in being transparent, *ie* be committed to a broad range of public input.

(Mr A. Gubb, Wildlife Society, Western Cape Branch: letter to Advocate F. Kahn, Chairman of the Rationalisation Working Group: 10 August 1993).

3. PHYSICAL FEATURES AND WATER

3.1 HAZARDOUS AREAS

Experts should assess hazardous areas and management plans should be established to manage the areas.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

It is important to reconsider the fire control system, as the effects of fires can cause the loosening of boulders on severe slopes and these can roll into urban areas or be hazardous to walkers within the CPPNE. *

(Mr G. Boddington: personal comments on Document 1 of Circular 1: 10 June 1993; and Mr F. Britton and James John Jackleman: personal comments on Circular 1: no date).

The public should be educated about hazardous areas on the mountain. *

(Silvermine River Society: comments on Document 1 of Circular 1: no date).

Hazardous areas/paths should be clearly marked on the map. *

(Silvermine River Society: comments on Document 1: no date; Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle: 31 March 1993; Mrs D. Wilson: letter to the Cape Times: 8 April 1993; Mr Taylor: comments on Document 1 of Circular 1: no date; and Mr M. Clark, Member of the Mountain Club of South Africa: letter to the Management Advisory Committee of Cape Peninsula Protected Natural Environment: no date).

Potential hazards include mines; caves; landslide areas; areas where there is a the potential for boulders to roll (*eg* Sandy Bay); and areas where humans have induced hazards (*eg* Victoria Drive).

(Mr P. Britton, Cape Town City Council: official comments on Circular 1: 25 June 1993).

Unstable areas are unstable slopes and sink holes.

(Comments from meeting with Cape Provincial Administration: 12 March 1993).

There should be as little resource utilisation as possible, except for research purposes and recreational activities based on sustainable use of these resources. *
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

Open spaces should be seen as a regional facility.
(Representatives of local council in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

3.2 ROCKS AND SOILS

Erosion control should be based on public awareness, micro planning and entrenched functions.

(Mr EA. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

The unconsidered removal of alien trees* can result in increased erosion.
(Mr J.S. Marais: letters to Mr A.J. Weinberg, Councilor of the City of Cape Town: 10 February 1993 and 31 March 1993; letters to Mr G Manson-Kullin, Llandudno Local Council: 18 January, 21 January and 8 March 1993; and to Mr Kobus Meiling, the Administrator: 3 February 1995: forwarded to Professor R.F. Fuggle).

The public should be educated* about erosion control.
(Silvermine River Society: commenting on Document 1 of Circular 1: no date; Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

The causes of erosion need to be addressed.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

Interferences with natural processes and the resultant erosion need to be addressed (eg Sandy Bay).
(Mr F. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

Work is desirable in various steep eroded gullies to prevent excessive erosion and the consequent transfer of the products of erosion into the urban drainage system.
(Mr M.B. Lief, City Engineer: Letter commenting on Circular 2: 13 September 1993).

Mining should not be allowed in the CPPNE.
(Mr P. Salter, Chairperson Simon's Town Flora Conservation Group: letter commenting on Circular 1, 26 May 1993; Mr A. Gubb, Wildlife Society, Western Cape Branch: letter: 27 April 1993; Mr F. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993; and Mr T. Keane, fish Hoek Alien Vegetation Control Group: letter commenting on Circular 1: 18 May 1993; Representative of national conservation organisation: CPFPIE Interviews: 26-28 April 1993).

Quarrying should not be allowed.
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Mineral rights should be established (le State, public and private rights).
(Mr P.B. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

* Indicates a cross-referral to another section

Public pressure should be used in preventing mining in the CPPNE. *(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).*

All mining and prospecting rights within the CPPNE should be revoked.
(Representatives of local council in the Cape Peninsula: CPPIYE Interviews: 26-28 April 1993)

Mining should not be used to create employment opportunities, rather tourism should be used to create these opportunities. *
(Representatives of a squatters in the Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

Mineral rights should be included as a criteria for zoning* within the CPPNE.
(Mr W. van Warmelo, !fa/lifat Council: comments on Document 1 of Circular 1: 30 April 1993).

The use of old quarries needs to be addressed, especially as they are almost all at the urban-natural interface.
(Mr G. Boddington: personal comments on Document 1 of Circular 1: 10 June 1993).

3.3 Water

Desalination should be considered as a means of providing Cape Town with water.
(Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

Issues pertaining to the city's water supply need to be addressed.
(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993).

Underground water sources should be protected areas.
(Mr F.A. Fehrser, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993)

A huge cost in the future is going to be the maintenance of river systems.
(Representatives of local council in the Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

The downstream impacts outside of the CPPNE, of any river policy, need to be considered.
(Mr F. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

A clear definition of wetlands needs to be established and then they need to be located so that they can be properly conserved and managed.
(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

Special protection needs to be afforded to wetlands.
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

* Indicates a cross-referral to another section

There needs to be a single controlling authority for wetlands and rivers.

(Mr P.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1995)

Catchment management should be integrated with biotic management.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

Certain areas should be prioritised for catchment management.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

No more dams should be built in the CPPNE as they decrease the attractiveness* of the mountains.

(Mr P.E. Blignaut• letter to Sue Lane commenting on Circular 1: 2 April 1993).

No more dams should be built within the CPPNE as they destroy the habitats of fauna* and important vegetation.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

In the areas prioritised for water catchment management, there should be no burning* as this increases runoff.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Alien vegetation* in catchment areas should be removed as this will increase runoff.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Deliberate burning* needs to be carefully managed as it often results in species loss, alien invasion, mud and rock slides, dam siltation, etc.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

The fact that catchments occur over the length of a river should influence the way in which rivers are controlled.

(Mr G. Boddington: personal comments on Document 1 of Circular 1: 10 June 1995).

The fencing of water catchment areas should be addressed.

(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993).

The Silvermine catchment area needs to be examined.

(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993).

3.4 Air

The majority of the time views are obliterated by air pollution. This problem should, be dealt with.

(Sandy Tolosana, Zoology Department, LICT: letter to Rachel Wynberg:• 12 August 1993; Mr P. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993; and Mr W. van Warmelo, Habitat Council: comments on Document 1, Circular 1: 30 April 1993).

Dust pollution from construction in or alongside the CPPNE should be considered as air pollution.

• Indicates a cross-referral to another section

(Mr G. Boddington: personal comments on Document 1 of Circular 1: 10 June 1993).

The legislation needs to be applied stringently to control pollution within and adjacent to the CPPNE.

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

Wind should be considered as an energy resource.

(Mr G. Boddington: personal comments on Document 1 of Circular 1: 10 June 1993).

3.5 Fire

Existing, inadequate and overlapping legislation about fire control needs to be examined.

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

The status of the CPPNE Fire Control Committee needs to be addressed.

(Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

It is important to reconsider the fire control system, as the effects of fires can cause the loosening of boulders on severe slopes and these can roll into urban areas or be hazardous to walkers within the CPPNE.

(Mr A. Boddington: personal comments on Document 1 of Circular 1: 10 June 1993; and Mr P. Britton and James John Jackleman: personal comments on Circular 1: no date).

There is a need for an integrated radio net for the Cape Peninsula.

(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

At present, the Regional Services Council and Cape Town City Council cannot communicate about fires via radio as their radio frequencies are different.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Fire is to a limited extent a problem on the mountain.

(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

The fire management system needs to be rationalised.

(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

In the areas prioritised for water• catchment management, there should be no burning to increase runoff.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

In certain circumstances urgent remedial work is required after fires.

(Mr M.B. Lief, City Engineer: Letter commenting on Circular 2: 13 September 1993).

Preventative measures need to be considered for fire control.

(Mr F. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

The speed of the response to fires is crucial to their containment (This is a weakness of the Simon's Town Municipality).
(Municipality in the Cape Peninsula: CPPNE Interviews: 26 - 28 April 1995).

There needs to be a management tool for fire control.
(Comments from meeting with Cape Provincial Administration: 12 March 1995).

A priority is an effective fire protection plan.
(Mr D. Wightman, Plants Cape (PTY) Ltd: letter: 29 July 1993; Mr F.A. Fehrson, Development Promotion, Small Development Corporation LTD: letter to Rachel Wynberg commenting on Document 1 of Circular I: 29 April 1995).

There should be a single controlling authority for fire control.
(Mr F.A. Fehrson, Development Promotion, Small Development Corporation LTD: letter to Rachel Wynberg commenting on Document 1 of Circular I: 29 April 1995).

Fire control should be an entrenched function within the management structure.
(Mr F.A. Fehrson, Development Promotion, Small Development Corporation LTD: letter to Rachel Wynberg commenting on Document 1 of Circular I: 29 April 1995)

There needs to be policy to co-ordinate all fire control activities (i.e. planning, fire fighting).
(CFPNE Managers Forum: Issues identified at meeting: 24 March 1995; Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date; Representatives of local conservation organisation: UTNE Interviews: 26-28 April 1995).

There needs to be a system of reporting on fires.
(CPPPIE Managers Forum: issues identified at meeting: 24 March 1995).

There needs to be a process to allow field managers to make decisions to burn with some indemnity for their actions.
(UTNE Managers Forum: issues identified at meeting: 24 March 1993).

A burning decision-making process needs to be established.
(Mr P. Britton and Mr J. Jackleman: personal comments on Circular I: no date).

There needs to be a system of detection and suppression versus controlling unplanned fires (i.e. allow areas to burn out).
(Mr P. Britton and Mr J. Jackleman: personal comments on Circular I: no date).

Decisions about fire control need to consider controlled burns to reduce fire hazards versus biological conservation*.
(Mr P. Britton and Mr J. Jackleman: personal comments on Circular I: no date).

To reduce risk of large wildfires, fynbos communities should be burnt on a patchwork pattern of differing fire-ages, which should be determined by research. •
(Mr IL C. Taylor: comments on Document 1 of Circular 1: no date).

Indigenous forest and thicket communities should be protected from fires. *
(Mr IL C. Taylor: comments on Document 1 of Circular 1: no date).

There needs to be minimal prescribed burning (min. 15 years) of mature vegetation which is a fire hazard.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Deliberate burning needs to be carefully managed as it often results in species loss, alien invasion, mud and rock slides, dam siltation, etc *

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

There might need to be a different fire strategy for the City Bowl which is highly visible.

(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1995).

The ultimate objective is to have a full-time helicopter to control fires.

(Municipality in the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

There needs to be a fire weather prediction system to assist with decisions concerning controlled burning.

(CPPIYE Managers Forum: Issues identified at meeting: 24 March 1993).

It is necessary to review the firebreak system.

(Silvermine River Society: commenting on Document 1 of Circular 1: no date).

There needs to be an active policy to upgrade the firebreak systems.

(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

The firebreak and control systems need to be rationalised.

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

Firebreaks protecting the urban-nature interface are a visual eyesore and not entirely justified. *

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Some fire control measures are firebelts, block burns and a dedicated helicopter service.

(Mr C.11. Langley: letter commenting on Circular 1: 28 May 1993).

There is a need for policy on the use of firebreaks.

(CPPIYE Managers Forum: issues identified at meeting: 24 March 1993).

Fire breaks on the urban fringe need to be examined.

(CPPIYE Managers Forum: issues identified at meeting: 24 March 1995).

A system of funding (le who should pay) needs to be established for fire control. *

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

At present there are no contingency funds for fire control emergencies. *

(Managers of the Cape Peninsula: CFPIYB Interviews: 26 28 April 1993).

Fire control and burning policy need to be adapted to modern trends and rural/urban fringes.

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

The onus should be on landowners adjacent to the CPPNE to take fire precautions (eg design of houses).

(Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date; Mr F.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Insurance premiums and liability related to fire need to be addressed.

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

The public needs to be educated* about fire control and prevention.

(Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date; Mr F.A. Fehrsen, Development Promotion, Small Development Corporation LTD: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

There should be education about safety issues and fire. *

(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

3.6 Pollution

Pollution should be more strictly controlled.

(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Littering and **dumping** should be controlled within and adjacent to the **CPPNE**.

(Silvermine River Society: comments on Document 1 of Circular 1: no date; Mr Q. Boddington: personal comments on Document 1 of Circular 1: 10 June 1993).

Pollution problems that need to be controlled within and adjacent to the CPPNE are sewerage, stormwater and de-forestation.

(Mr F. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

There should be heavy fines for littering within the CPPNE.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Graffiti should be regarded as pollution, and controlled as such.

(Mr W van Warmelo, Habitat Council: comments on Document 1 of Circular 1: 30 April 1993).

Marine pollution could be monitored by 'watchdog' volunteers from all around the coast.

(Pk P. Blignaut: letter to Sue Lane commenting on Circular I: 2 April 1993).

Pollution control should be an entrenched function of the management.

(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document I of Circular I: 29 April 1993).

Dog faeces and garden refuse dumping are pollution problems.

(Mr C.11 Langley: letter commenting on Circular 1: 28 May 1993).

* Indicates a cross-referral to another section

The public should be educated* about pollution.

(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

There should be individual and institutional awareness about pollution control.

(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

Education*, through interpretative centres and signboards, is the key to minimising the litter problem.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

4. BIOLOGICAL DIVERSITY

4.1 General

Maintenance of bio-diversity is important in the fynbos communities.

(Mr tl.C. Taylor: comments on Document 1 of Circular 1: no date).

The CPI'NE needs to be managed for biodiversity protection and recreation*.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

The public should be educated* about biodiversity.

(Silvermine River Society: comments on Document 1 of Circular 1: no date).

Carrying capacity needs to be carefully defined to include both psychological (social) and ecological aspects. Some say that carrying capacity is a myth. For the ecological side you can design (use) mitigating measures to absorb very large numbers of people, way beyond the psychological carrying capacity.

(Mr O. Boddington: personal comments on Document 1 of Circular I: 10 June 1993).

Decisions about fire* need to consider controlled burns to reduce fire hazards versus biological conservation.

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

4.2 Flora and Alien Vegetation

Harvesting of indigenous vegetation and/or other species should be delayed until research has established the permissible levels of use.

(Mr lf.C. Taylor: comments on Document 1 of Circular 1: no date).

A revegetation programme for unstable areas should be a management priority.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

* Indicates a cross-referral to another section

- **Alien Vegetation**

There should be biological control of alien vegetation.
(Silvermine River Society: commenting on Document 1 of Circular 1: no date).

There is a need for more controlled eradication of aliens.
(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

The 'culling' of alien trees should be stopped immediately as it is destroying the visual beauty* of the mountain.
(Ms S. Louw: letter to Environmental Evaluation Unit: no date).

Invasive alien plant eradication must be stepped up.
(Mr P. Salter, Chairman Simon's Town Flora Conservation Group: letter commenting on Circular 1: 26 May 1993; and Ms P. Newby: letter to Sue Lane commenting on Circular 1: 2 April 1993).

The CPPNE should be free of aliens (including the removal of plantations).
(Mr A. Gubb, Wildlife Society, Western Cape Branch: letter: 27 April 1993).

The priority is to manage alien vegetation within a core area.
(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

It is not certain whether total eradication of aliens is necessary, as aliens provide shade and a sense of place.
(Representative of national conservation organisation: CITIYE Interviews: 26-28 April 1993).

There should not be excessive control of aliens.
(Municipality in the Cape Peninsula: CITIYE Interviews: 26 28 April 1993).

Deliberate burning' needs to be carefully managed as it often results in species loss, alien invasion, mud and rock slides, dam siltation, etc *
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular I: 2 April 1993).

Policy needs to consider the re-establishment of indigenous vegetation into alien infested areas.
(Mr F. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

There are several areas in the Peninsula which should be given high priority for the clearing of alien invasive vegetation.
(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CITIYE Project by Chief Executive Officer: 8 September 1993).

For maximum efficiency one should have permanent small (4-6 persons) teams of personnel specially trained to eradicate invasive alien vegetation. Give precedence to low-intensity and outlying infestations, leaving high-density thickets for larger teams.
(Mr If. C. Taylor: comments on Document 1 of Circular 1: no date).

* Indicates a cross-referral to another section

The issue of who should clear alien vegetation needs to be addressed.
(Mr C.f. Langley: letter commenting on Circular 1: 28 May 1993).

The issue of Who should monitor alien vegetation needs to be addressed.
(Mr Cif. Langley: letter commenting on Circular 1: 28 May 1993).

The issue of how alien vegetation* should be monitored should be addressed.
(Mr C.11: Langley: letter commenting on Circular 1: 28 May 1993).

Alien vegetation in catchment areas should be removed as this will increase runoff.
(Mr P.L. Blignaut:• letter to Sue Lane commenting on Circular 1: 2 April 1993).

Alien vegetation should be removed within 100m of scenic* drives and replaced with indigenous plants and trees, especially at viewpoints.
(Mr Ii C. Taylor: comments on Document 1 of Circular 1: no date).

Alien vegetation is tine in some areas, such as picnic sites as it provides shade.
(Mr R. Ifulley, Fairest Cape Association: telephone conversation: 29 April 1993).

Aliens are acceptable at picnic sites.
(Municipality in the Cape Peninsula: CITIYE Interviews: 26 - 28 April 1993).

Exotics just outside of the CPPNE need to be controlled since these are the source of reseeding within the CPPNE boundary.
(Mr G. Boddington: personal comments on Document 1 of Circular 1: 10 June 1993).

Private development could be used to help control alien vegetation, for example by focusing development on the perimeters of the CPPNE.
(Municipality in the Cape Peninsula: CPPNE Interviews: 26 28 April 1993).

The issue of alien garden plants from the urban fringe invading into the CPPNE needs to be addressed.
(CPPNB Managers Forum: Issues identified at meeting: 24 March 1993).

The expense of clearing alien vegetation needs to be addressed.
(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1995).

The issue of whether or not ratepayers should be funding alien removal needs to be addressed.
(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993).

The creation of woodlots should be examined.
(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993).

The use of alien vegetation as firewood and woodlots should be assessed..
(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date; and Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

• Indicates a cross-referral to another section

- **Indigenous Vegetation**

All degraded areas should be rehabilitated.

(Mr A. Gubb, Wildlife Society, Western Cape Branch: letter: 27 April 1995).

Grazing should not be condoned in any form as it is a major cause of fynbos depletion and erosion.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Trees provide a hiding place, shelter and fuel for squatter communities. *

(Representatives of informal settlement communities in the Cape Peninsula: CPPIYE Interviews: 26-28 April 1995).

No more dams* should be built within the CPPNE as they destroy the habitats of fauna* and important vegetation.

(Mr P.B. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Alien vegetation should be removed within 100m of scenic drives* and replaced with indigenous plants and trees, especially at viewpoints*.

(Mr H. C. Taylor: comments on Document 1 of Circular 1: no date).

To reduce risk of large wildfires, fynbos communities should be burnt on a patchwork pattern of differing fire-ages, which should be determined by research. *

(Mr Ib C. Taylor: comments on Document 1 of Circular I: no date).

Indigenous forest and thicket communities should be protected from fires*.

(Mr H.C. Taylor: comments on Document 1 of Circular 1: no date).

Where plantations* have been burned afforestation* with indigenous plants and trees should be considered.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular I: 2 April 1993).

Bark stripping should be considered as a social need.

(Mr F. Britton, Cape Town City Council: official comments on Circular I: 25 June 1995).

Utilisation of indigenous flora needs to be considered (eg bark stripping and sale of resources like flowers).

(CITIYE Managers Forum: issues identified at meeting: 24 March 1993).

Policy needs to address the re-establishment of indigenous, rare and threatened species.

(Mr P. Britton, Cape Town City Council: official comments on Circular 1: 25 June 1993).

- **Afforestation**

The historic plantations (le Tokai, Cecilia and Newlands) should be retained for multiple use: timber production and recreation.

(Mr H.C. Taylor: comments on Document 1 of Circular 1: no date).

• Indicates a cross-referral to another section

Criteria that should be used when examining the plantations are: (a) their viability and (b) their recreational use. *

(Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date; and Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

The plantations need to be properly managed so that they do not encroach on the fynbos.

(Mr F.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

The viability and future of plantations needs to be considered.

(CPPIYE Managers Forum: Issues identified at meeting: 24 March 1993).

Agriculture

Some eco-friendly agricultural activities could be allowed on private land within the CPPNE (eg medicinal plant nurseries, harvesting and fynbos cultivation).

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

The agricultural remnants in Constantia, Noordhoek and Hout Bay are culturally significant and should be maintained by sympathetic management practices.

(Ms S. Ilustwick and Ms M. Atwell, Urban Conservation Unit suggestions, Cape Town City Council: 21 September 1993).

The slopes of the mountain that are presently under agriculture and forestry should remain so, rather than reverting to fynbos*.

(Ms S. Ifustwick and Ms M. Atwell, Urban Conservation Unit suggestions, Cape Town City Council: 21 September 1993).

4.3 Fauna

Appropriate indigenous buck should be re-introduced.

Policy should address the possible re-introduction of fauna species

(Mr F. Britton, Cape Town City Council: official comments on Circular 1: 25 June 1993; and Mr Cif. Langley: 28 May 1993; Mr F.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

The most effective way to conserve rare and threatened fauna needs to be considered.

(Mr P. Britton, Cape Town City Council: official comments on Circular 1: 25 June 1993).

The extermination of certain exotic fauna needs to be considered.

(Mr Cif. Langley: Letter commenting on Circular 1: 28 May 1993).

The problem of alien fauna needs to be surveyed and then policy should be set that determines the methods and priorities of the management of aliens.

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

There are many more alien fauna problems than stated in Circular 1 (eg the grey squirrel, Argentinean ants, etc) that need to be considered.

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

No more dams should be built within the CPPNE as they destroy the habitats of fauna and important vegetation. *

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Tahrs should be limited to non-invasive level, which means minimal erosion and user-conflict.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Dogs should be regarded as alien fauna.

(Mr F.A. Pehrson, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1995).

Fishing should be considered for the 5 dams on the Back Table. If trout could survive, this activity could act as source of revenue.

(Mr G. Boddington: personal comments on Document 1 of Circular 1: 10 June 1993).

5. CULTURAL AND SCENIC FEATURES

5.1 Aesthetics

People get a sense of direction from the mountain. It provides them with a sense of place.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Table Mountain has spiritual significance.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Table Mountain is the 'Statue of Liberty of South Africa.'

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Aesthetic and spiritual criteria should be used for deciding on 'cherished areas'.

(Mr W. van Warmelo, Habitat Council: comments on Document 1 of Circular 1: 30 April 1993)

The maintenance of the visual quality is crucial as the peninsula will not be sold on species diversity etc`

(Representative of local authority in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

If the visual integrity of the mountain is maintained, it will be a major success (*ie* must keep landscapes open).

(Representative of local authority in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

* Indicates a cross-referral to another section

The CFPNE should be recognised as the future economic wealth of the greater Cape Town Metropolitan Area, primarily due to its scenic beauty, both from the sea and land. (Mr A. Clubb, Wildlife Society, Western Cape Branch: letter, 27 April 1993).

People's perceptions of the conservation, scenic and historic* value of the CFPNE need to be taken into consideration.

(Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

Visual quality from the land and the sea needs to be maintained.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Visual quality should be based on micro and macro areas.

(Mr P.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

There is a need to develop 'honeypots' to attract tourists to generate income and preserve the visual integrity of the area.

(Representative of local authority in the Cape Peninsula: CPPPIE Interviews: 26-28 April 1993).

The wineland areas within Cape Town (eg on the slopes of Constantiaberg - Vlakkenberg) create visual relief.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular I: 2 April 1993).

The public should be educated* about the visual resources of the CPPNE. *

(Mr P.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document I of Circular I: 29 April 1993).

Fire breaks protecting the urban-nature interface are a visual eyesore and not entirely justified.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular I: 2 April 1995).

Control should be exercised along scenic mountain routes, both with regard to the construction of roads and adjacent development.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular I: 2 April 1993).

Any development should be visually sensitive (ie aesthetic and height controls).

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

No more dams* should be built in the CFFNE as they decrease the attractiveness of the mountains.

(Mr P.E. Blignaut: Letter to Sue Lane commenting on Circular I: 2 April 1995).

Scenic considerations should be used as criteria for boundary* changes.

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

Several aspects relating to Table Mountain as a cultural landscape are important:

- The mountain should be kept as a natural/seminatural landscape, as it is valued as such.
- The exotic pines, eucalyptus and oaks are a part of the altered cultural landscape and they have historical validity.

* Indicates a cross-referral to another section

- Maintenance of the mountain should reflect the fact that it is the country's most well known landmark.
- The relationship of the mountain as the dominant place-making element/landmark in relation to the surrounding residential fabric is important. This image of the City of Cape Town should be acknowledged.
- The visual balance of natural and residential components of the landscape should be maintained. The height to which buildings should be allowed to encroach further up the mountain slopes is therefore critical in maintaining sufficient dominance of the mountain slopes. *
- Landscaping of the urban-natural fringe and integration of trees into the residential/urban fabric is important in establishing a link between the urban and the natural. The urban-natural edge must be defined visually.
- The agricultural remnants in Constantia, Noordhoek and Flout Bay are culturally significant and should be maintained by sympathetic management practices.
- The slopes of the mountain that are presently under agriculture* and forestry* should remain so, rather than reverting to fynbos°.

(Ms S. flustwick and Ms M. Atwell, Urban Conservation Unit, Cape Town City Council: 21 September 1993).

The CPPNE needs to be protected and maintained as a visual resource.
(Senior City Council Staff: Main issues identified: March 1993).

The placement of aerials and masts need to be considered in terms of the preservation of the visual quality of the CPPNE.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

There should be a consistent theme for furniture, signage, lighting, etc in the developed areas of the CPPNE. There is a need for a guidelines manual to address these visual aspects.
(Mr U. Boddington: personal comments on Document 1 of Circular 1: 10 June 1993).

Visual resources need to be included as a component of land-use planning, together with biotic and abiotic factors. A Visual Resource Management Plan should be developed for the CPPNE.
(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1).

A landscape guideplan for the Peninsula is paramount.
(Representative of local authority in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

The upgrading of the upper cableway* station so that it was no longer an eyesore would be costly and therefore only considered if subsidies were offered.
(Representative of tourist organisation: CPPIYE Interviews: 26-28 April 1993).

Moving the upper cableway* station back would inflict on TV aerials etc which are buried behind it.
(Representative of tourist organisation: CPPIYE Interviews: 26-28 April 1993).

Another cableway* from another point is not acceptable as it would disrupt the panoramic view too much.
(Representative of tourist organisation: CPPIYE Interviews: 26-28 April 1993).

The present cableway* construction is ugly and the visual aspect is crucial. *
(Representative of recreation organisation: CFFIYE Interviews: 26-28 April 1993).

It would be a good idea to move the upper cableway station, however it is not that important as people have gotten used to it being there.
(Representative of national conservation organisation: CFPPIE Interviews: 26-28 April 1993).

An expansion of the present cableway infrastructure will harm the aesthetics of the most attractive part of the mountain range. An alternative Waterfront - Signal Hill linkup to the mountain seems more acceptable. *
(Mr F.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

View points should be provided on scenic routes around the entire UTNE.
(Mr F.B. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

There should be environmental interpretation* material provided at prominent viewing sites, such as Signal Hill.
(Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle: 31 March 1993; Mr Taylor: comments on Document 1 of Circular 1: no date; Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date; Mr F.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Viewpoints are 'cherished areas'.
(Silvermine River Society: comments on Document 1 of Circular 1: no date).

Alien vegetation* should be removed within 100m of scenic drives and replaced with indigenous plants and trees, especially at viewpoints.
(Mr TLC. Taylor: comments on Document 1 of Circular 1: no date).

5.2 Cultural Sites and Landscapes

An area should be regarded as a cherished area if it has a symbolic meaning or people have formed an image of this area (eg parts of Table Mountain).
(Mr A Boddington: personal comments on Document 1 of Circular 1: 10 June 1995).

All cultural, historical, archaeological, geological and spiritual places and areas should be determined and protected in terms of Mountain Feature Zoning* which permits public access under strict control.
(Mr P.E. Blignaut: • letter to Sue Lane commenting on Circular 1: 2 April 1993).

A social need that the CFPNE fulfills is spiritual.
(Mr W. van Warmelo, Habitat Council: comments on Circular 1: 30 April 1993).

Table Mountain has symbolic value as the gateway to South Africa. As a National Monument, a World Heritage Site, or portrayed on the national flag, Table Mountain appears to justify this special image.
(Mr F.B. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

• indicates a cross-referral to another section

Social and cultural activities that jeopardise the pleasure of the majority and the tourist* potential of the CPPNE should not be condoned.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Initiation ceremonies are not traditional to the CPPNE. These entail sleeping on the mountain and utilising the natural resources.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

The use of the CPPNE for religious fasts (ie eg living in caves on the mountain) will need investigation.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Existing formal religious activities are a part of the heritage of Cape Town and should be seen as enhancing the atmosphere on the mountain (eg mosque, annual Maclear's Beacon service, etc).

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

It is not certain whether total eradication of aliens* is necessary, as aliens provide shade and a sense of place.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

People's perceptions of the conservation, scenic and historic value of the CPPNE need to be taken into consideration.

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

People's political perceptions need to be taken into consideration.

(Mr W van Warmelo, Habitat Council: comments on Document 1 of Circular 1: 30 April 1993).

People do not see the 'mountain' as a unit.

(Representative of a civic organisation: CPPIYE Interviews: 26-28 April 1993).

5.3 Recreation and Tourism

Table Mountain has recreational significance.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

An international icon for Table Mountain should be considered.

(Mr G. Boddhlton: personal comments on Document 1 of Circular 1: 10 June 1993).

Recreation should be emphasised.

(Representatives of local conservation organisation: CPPNE Interviews: 26-28 April 1995).

Table Mountain is important in terms of: tourism, GDP, and jobs for Capetonians.

(Representative of a civic organisation: 26-28 April 1993).

* Indicates a cross-referral to another section

Policy relating to recreation is essential.
(Senior City Council Staff: Main issues identified: March 1993).

Conservation*, recreation and tourism interests can be reconciled.
(Comments from meeting with Cape Provincial Administration: 12 March 1995).

Two issues related to the management of urban pressures are coastal protection and recreation.
(Mr P. Britton, Cape Town City Council: official comments on Circular 1: 25 June 1995).

Table Mountain is in a metropolitan area and is therefore the only recreational area for many people.
(Representative of recreational organisation: CPPIYE Interviews: 215-28 April 1995).

A social need that the CPPNE fulfills is recreation.
(Mr F.A. Fehrson, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993; and Mr W. van Warmelo, Habitat Council: comments of Circular 1).

The CPPNE needs to be managed for biodiversity* protection and recreation.
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular I: 2 April 1995).

The development of other (alternative) recreational resources in the Cape Town area by means of a management policy needs to be examined in order to decrease the recreational pressure on the CPPNE.
(Silvermine River Society: commenting on Document I: no date; and Ivan Mouton, Chairman of Kaapstad Sakekamer: letter commenting on Circular I: 3 May 1993).

Development rights (public and private) must conform to an overall plan that requires that development be aligned to mountain recreation activities, eco-tourism and educations (environmental interpretation centres, etc).
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular I: 2 April 1993).

There should be as little resource utilisation as possible, except for research* purposes and recreational activities based on sustainable use.
(Mr F.E. Blignaut: letter to Sue Lane commenting on Circular I: 2 April 1993).

Users are an intrinsic part of the mountain, and appropriate provision should be made in planning for their welfare.
(Diana Wilson: letter to the Cape Times: 8 April 1993).

Recreation and large events are major urban development pressures.
(Mr F.A. Fehrson, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

Dogs should be permitted under control.
(Ms F. Newby: letter to Sue Lane; 3 August 1993; Mr M. Clark, Member of the Mountain Club of South Africa: letter to the Management Advisory Committee of Cape Peninsula Protected Natural Area; and Mr P.E. Blignaut: letter to Sue Lane commenting on Circular I: 2 April 1995).

Dogs should be permitted under control, in all areas except where picnicking takes place or where semi-wild animals, such as the buck at Rhodes Memorial, are present.
(Mr C. Goldschmidt, committee member of Peninsula Orienteering Club: letter commenting on Circular 1: 2 May 1993).

Airspace should be a minimum of 500m above the ground, particularly for helicopters.
(Mr P.E. Blignaut• letter to Sue Lane commenting on Circular 1: 2 April 1993).

The mountain should be managed in an integrated manner for: nature protection,* ecotourism, recreation and environmental education.'
(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Concentrated recreational/tourist nodes (*coney islands") need to be identified.
(Mr P. Britton and Mr J. Jacklernan: personal comments on Circular 1: no date).

Recreation and tourism use of the CPPNE should be based on the event/activity.
(Mr F.A. Fehrson, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

Recreation and tourism use of the CPPNE should be based on the entrenched function of the area.
(Mr F.A. Fehrson, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

The numbers of people using the mountain for recreation need to be controlled.
(Mr P. Britton, Cape Town City Council: official comments on Circular 1: 25 June 1993).

There should be continued access to the UTNE for recreational purposes. *
(A./Y Starke: letter to Professor R.F. Fuggle: 4 August 1993).

There should be regular 'patrols' of the mountain.
(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

There needs to be a set of uniform regulations that users should abide by and that is enforced.
(Mr P. Britton and Mr J. Jackleman: personal comments on Circular I: no date).

Criteria that should be used when examining the plantations* are: (a) their viability and (b) their recreational use. "
(Mr F. Britton and James John Jackleman: personal comments on Circular I: no date; and Mr P.E. Blignaut: letter to Sue Lane commenting on Circular I: 2 April 1993).

The CPPNE should be used for hiking, picnicking in suitable area, and research and educational purposes in these and other, areas. *
(Mr P. Salter, Chairman Simon's Town Flora Conservation Group: letter commenting on Circular 1: 26 May 1993).

Silvermine should be used.
(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

• Indicates a cross-referral to another section

Silvermine River System should be recognised as a conservation, education and recreation* asset.
(Kim Kruyshaar, Silvermine Valley Coalition Co-ordinator: letter to Sue Lane: 1 February 1994).

The waterfall area in Simon's Town should be included as a recreational area.
(Municipality in the Cape Peninsula: CPPIYE Interviews: 26-28 April 1995).

Uniform signage is required.
(CPPIYE Managers Forum: Issues identified at meeting: 24 March 1995).

Recreation and tourism use of the CPPNE should be based on the carrying capacity of the area.
(Mr FA. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel LVynberg commenting on Document 1 of Circular 1: 29 April 1993).

When compared to other mountain areas (eg Snowdonia) the CPPNE is far from reaching its recreation carrying capacity.
(Representative of recreational organisation: CPPIYE Interviews: 26-28 April 1993).

The technical carrying capacity of the mountain needs to be determined.
(Representative of recreational organisation: CPPIYE Interviews: 26-28 April 1993).

Differing activities should be promoted to ensure that the carrying capacity is not exceeded.
(Representative of recreational organisation: CPPIYE Interviews: 26-28 April 1995).

The zoning of the CPPNE should make it people-friendly eg could have an easily accessible recreational zone: a buffer zone with a few trails; and beyond this a proper nature reserve which would act to 'entice' people. *
(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Passive recreation needs to be included as a recreational use (ie people seeking solitude and escape from the urban jungle).
(Mr a Boddington: personal comments on Document 1 of Circular 1: 10 June 1993).

Priorities are the development of sympathetic recreation (eg controlled walks) and unsympathetic recreation (eg cableways, utilisation subject to EIA).
(Managers of the Cape Peninsula: CFPNE Interviews: 26 - 28 April 1995).

There need to be acceptable categories of recreational use.
(Mr F. Britton, Cape Town City Council: official comments on Circular 1: 25 June 1993).

- **Facilities**

The Red Hill Golf Course should be built.
(Ms S. Louw:• letter to Environmental Evaluation Unit: no date).

• Indicates a cross-referral to another section

The area around Woodhead Reservoir could be developed as a recreational area with a shuttle bus/chair via Kirstenbosch/Cecilia.

(Representative of national conservation organisation: CFPNE Interviews: 26-28 April 1993)

More braai facilities at demarcated fire places on the Back Table around the reservoirs, and at other places on the mountain chain should be developed.

(Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle: 31 March 1993).

Restaurants and refreshment facilities at sites such as Signal Hill, the lower cableway should be opened.

(Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle: 31 March 1993).

No more facilities, such as restaurants and refreshment stands, should be developed in the CPPNE. Existing facilities need to be used.

(Mr H.C. Taylor: comments on Document 1 of Circular 1: no date).

Infrastructural development should only occur where absolutely essential. These should be related to zoned areas and infrastructural corridors. *

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

There should be toilet facilities at major access and control points to prevent water pollution. Signboards should include information re this matter.

(Mr P.B. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

There is going to be an increasing need for facilities and 'barrier free design'.

(Representatives of local conservation organisation: CPPNE Interviews: 26-28 April 1993).

The extension of Tafelberg Road as an access* route for cycling and walking, should be considered vehicular route would conflict with its present use for a shuttle service.

(Representative of tourism organisation: CPPIYE Interviews: 26-28 April 1993).

Recreational areas must be expanded (and charged for).

(Municipality in the Cape Peninsula: CFPNE Interviews: 26 - 28 April 1993).

Picnic areas could be developed, but they should be carefully chosen.

(Municipality in the Cape Peninsula: UTNE Interviews: 26 - 28 April 1993).

The expense of maintaining picnic sites, which allow free access, needs to be addressed.

(UTNE Managers Forum: Issues identified at meeting: 24 March 1993).

Existing picnic areas could be used to develop bungalows etc (eg Cape Point, Silvermine).

(Municipality in the Cape Peninsula: CPPIYE Interviews: 26 28 April 1993).

- **Safety**

The Mountain Club of South Africa should receive regular grants so that it can continue to provide mountain safety services.

(Mr P.E. Blignaut:• letter to Sue Lane commenting on Circular 1: 2 April 1995).

* Indicates a cross-referral to another section

Safety on the mountain is a big issue.

(Representatives of a civic organisation, local conservation organisation and a recreational organisation: CPPIYE Interviews: 26-28 April 1993).

The dangers of letting people use the CPPNE need to be determined.

(Representative of recreational organisation: CPPIYE Interviews: 26-28 April 1993).

There are safety signs but these are ignored.

(Representative of recreational organisation: CPPIYE Interviews: 26-28 April 1993).

The authorities need to educate the public to prevent access to dangerous routes and areas.

(Representative of local conservation organisation: CPPIYE Interviews: 26-28 April 1995).

Safety on the mountain should be regarded as a key issue.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

• **Sport**

Organised sport must be accommodated in the CPPNE guidelines.

(Mr C. Goldschmidt, committee member of Peninsula Orienteering Club: letter commenting on Document 1, Circular 1: 12 May 1995).

Each sport should be adjudicated on its merits with regard to number of participants, impacts on the area, control, etc.

(Mr C. Goldschmidt, committee member of Peninsula Orienteering Club: letter commenting on Document 1, Circular 1: 12 May 1995).

Horse riding should be permitted but only in certain parts where the paths are able to withstand the extra pressure and are not likely to become eroded. *

(Mr M. Clark, member of Mountain Club of South Africa: letter to the Management Advisory Committee of Cape Peninsula Protected Natural Area: no date).

Horse riders need to be included as users and consulted.

(D. Marshall, Secretary Sunnydale Ratepayers Association: letter commenting on Circular 1: 14 June 1995).

There is a need to define horse-riding areas and to provide horse trails in these areas.

(CPPIYE Managers Forum: issues identified at meeting: 24 March 1993).

Mountain-bikers, para- and hang-gliders should have special areas allocated to them to avoid user-conflict.

(Mr P.E. Bignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

The demand for mountain biking needs to be recognised and accommodated in the CPPNE.

(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1995).

A unified network of bike trails should be developed.

• Indicates a cross-referral to another section

(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

Mountain bikes need to be controlled.

(CPPIYE Managers Forum: issues identified at meeting: 24 March 1993).

Scramblers need to be controlled.

(CPPIYE Managers Forum: issues identified at meeting: 24 March 1993).

Tourism should be emphasised.

(Representative of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Only eco-tourism should be encouraged.

(Mr ILC. Taylor: comments on Document 1 of Circular 1: no date).

The potential for eco-tourism on Table Mountain has not been fully exploited (re: floral kingdom of the world).

(Representative of tourism organisation: CPPIYE Interviews: 26-28 April 1993).

There is a study which shows that Table Mountain is second only to the Kruger Park in terms of tourist potential.

(Representative of local authority in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

The preservation of the mountain is 'justified' from a tourism perspective.

(Representative of local authority in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

Using the mountain for commercial gain should be controlled - whether it be sponsorship or taking groups into the mountain. The numbers should be kept to an acceptable level.

(Mr P.E. Blignaut: letter to Sue Lane: 28 June 1993).

The nature of tourism within the CPPNE should be investigated.

(Mr P. de Tolley, Deputy City Planner: Comments on Circular 1: 7 May 1995).

There is concern that tourism targeted at the upper market would result in a few making money, with little being funnelled down for social upliftment.

(Representative of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

The wineland areas within Cape Town (eg on the slopes of Constantiaberg - Vlakkenberg) are a source of agri-tourism.

(Mr P.E.13lignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Social and cultural activities that jeopardise the pleasure of the majority and the tourist potential of the CPPIIE should not be condoned.

(Mr P.E. Blignaut• letter to Sue Lane commenting on Circular 1: 2 April 1995).

Education* of tourists is important.

(Mr P. de Tolley, Deputy City Planner: comments on Circular 1: 7 May 1993).

Tourists should contribute financially* to the mountain chain management.

(Mr P.E. Blignaut• letter to Sue Lane commenting on Circular 1: 2 April 1995).

Users and businesses that benefit from tourism should pay* towards the management of the mountain chain.

(Mr P. Blignaut• letter to Sue Lane commenting on Circular 1: 2 April 1995).

The flow of money (le back to the mountain chain) from tourism needs to be examined.

(Mr P. de Tolley, Deputy City Planner: comments on Circular 1: 7 May 1993).

Tourism revenue should be used solely to fund* the management of the mountain.

(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993).

The natural beauty of the mountain chain will not necessarily benefit the tourism industry and generate tourism income if the attractions and facilities do not meet the needs of the tourist. *

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: comments from meeting about CPPIYE Project: 8 September 1993).

Conservation, recreation and tourism interests can be reconciled.

(Comments from meeting with Cape Provincial Administration: 12 March 1993).

The mountain should be managed in an integrated manner for: nature protection*, ecotourism, recreation and environmental education*.

(Representative of national conservation orgardsation: CPPIYE Interviews: 26-28 April 1993).

Concentrated recreational/tourist nodes ('coney islands') need to be identified*.

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

Development* rights (public and private) must conform to an overall plan that requires that development be aligned to mountain recreation activities, eco-tourism and education (environmental interpretation centres, etc).

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

Presently there are no regulations on tourism in the UTNE.

(Representative of national conservation organisation: UTNE Interviews: 26-28 April 1993).

Small tour operators in the UTNE are not being helped by either SATOUR and CAPTOUR.

(Representative of tourism organisation: CITIYE Interviews: 26-28 April 1993).

* indicates a cross-referral to another section

SATOUR needs to adopt a more pragmatic approach in line with freemarket principles' within the CPPIYE.

(Representative of tourism organisation: CPPIYE Interviews: 26-28 April 1995).

There is no association of tour operators in the peninsula although CAPTOUR has a list of registered tour guides.

(Representative of tourism organisation: CPPNE Interviews: 26-28 April 1993).

Tourism is important in terms of employment generation.

(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

Resorts on appropriate sites on the Back Table around the reservoirs should be developed.

(Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle: 31 March 1993).

Funding* could come from the development of overnight chalets on a 2-3 day trail, targeted at the international market.

(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993)

The development of overnight accommodation within the CPPNE would be acceptable if it were strictly controlled and did not result in the further degradation of the mountain.

(Representatives of tourism organisations: CPPIYE Interviews: 26-28 April 1995).

People can easily get up and down the mountain in a day, therefore the need for overnight accommodation is questionable.

(Representatives of tourism organisation: CPPIYE Interviews: 26-28 April 1993).

There is scope for developing huts at Cecilia, although low density huts at Silvermine might be more appropriate.

(Representatives of tourism organisation: CPPNE Interviews: 26-28 April 1993).

Overnight accommodation at an area near Woodhead Dam would be supported.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1995).

Overnight accommodation in the CPPNE should not preclude the greater populace of Cape Town and should remain within their financial reach (*eg* hutted camp at Woodhead Dam).

(Representative of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

If overnight huts and additional hiking trails were controlled then they would be acceptable. *

(Managers of the Cape Peninsula: CPPNE Interviews: 26 - 28 April 1993).

• Indicates a cross-referral to another section

5.4 Education

The education aspect is crucial to the UCT study.

(Representative of a civic organisation and representative of local conservation group: 26-28 April 1993).

Environmental education about the CPPNE is a priority.

(Managers of the Cape Peninsula: CPPIYB Interviews: 26 28 April 1993).

Education ventures need to co-ordinated.

(Mr P. Britton, Cape Town City Council Official comments on Circular 1: 25 June 1995)

Education is integral to ensure that people are pro the conservation/preservation of an area.

(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

Education is clearly tied to an increased usage.

(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1995).

People first have to understand how and why the UCT study affects them.

(Representative of civic organisation: 26-28 April 1995).

Environmental concerns need to go hand in glove with capacity building and empowerment of communities.

(Representative of civic organisation: 26-28 April 1993).

The CPPNE should be used for hiking, picnicking in suitable area, and research' and educational purposes.

(Mr P. Salter, Chairman Simon's Town Flora Conservation Group: letter commenting on Circular 1: 26 May 1993).

Silvermine River System should be recognised as a conservation, education and recreation' asset.

(Kim Kruyshaar, Silvermine Valley Coalition Co-ordinator: letter to Sue Lane: 1 February 1994).

Development rights* (public and private) must conform to an overall plan that requires that development be aligned to mountain recreation activities, eco-tourism and education (environmental interpretation centres, etc).

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

The lower cableway station should be transformed into an attractive learning experience.

(Mr IL Harries: letter to Professor R.F. Fuggle responding to article in Argus on 9 August 1995: 9 August 1993).

Tractor rides in certain areas should be permitted as they will provide access to the mountain in a controlled manner, as well as educating the public who participate on the rides about the mountain.

(Zeller Karro: letter to Professor R.F. Fuggle: 17 June 1993).

As part of educating the youth, different schools could be custodians of different routes.

(Ms P. Newby: letter to Sue Lane: 3 August 1993).

Control and education go together. Law enforcement should be last resort. Fines imposed should preferably be non-monetary, but should relate to increasing the person's environmental responsibility (*eg alien vegetation control*). "

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

The mountain should be managed in an integrated manner for: nature protection', ecotourism*, recreation* and environmental education.

(Representative of national conservation organisation: CPPNE Interviews: 26-28 April 1993).

It is suggested that there should be dovetailing of an education programme with the Olympics programme.

(Representative of local conservation organisation: CPPNE Interviews: 26-28 April 1993).

There need to be finances* set aside for environmental education in the CPPNE.

(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

Permits could have a strong functional role as an educational facility (*eg map and brochure would accompany permits*).

(Managers of the Cape Peninsula: CPPNE Interviews: 26 - 28 April 1995).

People should be drawn into designated access* areas, which also should have an educational role.

(Municipality in the Cape Peninsula: CPPNE Interviews: 26 - 28 April 1993).

There is a need for environmental interpretation and education centres* in the CPPNE.

(Mr G.M. Langley: Letter commenting on Circular 1: 28 May 1993).

Education of tourists is important. *

(Mr P. de Tolley, Deputy City Planner: Comments on Circular 1: 7 May 1993).

The public needs to be educated about the uniqueness of Table Mountain.

(Representative of tourism organisation: CPPNE Interviews: 26-28 April 1993).

The public should be educated about biodiversity*.

(Silvermine River Society: comments on Document 1 of Circular 1: no date).

The public should be educated about the carrying capacity of the CPPNE.

(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

The public should be educated about erosion* control.

(Silvermine River Society: commenting on Document 1 of Circular 1: no date; Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

The public should be educated about hazardous areas* on the mountain.
(Silvermine River Society: comments on Document I of Circular 1: no date).

The public should be educated about the visual* resources of the CPPNE.
(Mr F.A. Fehrser, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

The public should be educated about pollution*.
(Mr EA. Fehrser, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

The public should be educated about resource ownership, care and responsibility.
(Mr P.A. Fehrser, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular I: 29 April 1993).

The public should be educated about resource harvesting.
(Mr F.A. Fehrser, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document I of Circular 1: 29 April 1993).

The public needs to be educated about fire* control and prevention.
(Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date; Mr F.A. Fehrser, Development Promotion, Small Development Corporation LTD: letter to Rachel Wynberg commenting on Document 1 of Circular I: 29 April 1993).

The public should be educated about the psychological value of escaping from the city into a natural area.
(Silvermine River Society: comments on Document 1 of Circular 1: no date).

The public/user should be educated about how to look after the CPPNE area.
(Mr T. Keane, Fish Hoek Alien Vegetation Control Group: letter commenting on Circular I: 18 May 1993; and Professor C.L. Merry, Department of Survey and Geodetic Engineering, UCT: letter to Professor R.F. Puggle in response to article in Argus on 9 August 1993: 18 August 1993).

Environmental education should develop the awareness of individuals and institutions about the importance of the CPPNE.
(Mr F.A. Fehrser, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document I of Circular I: 29 April 1993).

The public should be educated as to how present actions (eg fire*, littering*, poor management, etc) threaten the CPPNE.
(Mr G. Boddington: personal comments on Document I of Circular 1: 10 June 1993).
Educational programmes directed towards creating a public awareness and beginning at grassroots level, of the duties and responsibilities incumbent upon users of the mountain, warrants serious attention.
(Mr ILK. Chapman, Chief Executive/Town Clerk, Fish Hoek Municipality: Letter responding to letter 7 September 1993: 14 September 1993).

There should be education about safety issues and fire*.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

• Indicates a cross-referral to another section

Education, especially in terms of maps is crucial, as there are too many access* points to have control points dishing out maps.

(Managers of the Cape Peninsula: CPPNE Interviews: 26 - 28 April 1993).

Interpretation centres should be provided at key access* points to the mountain, such as Kloof Nek.

(Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle: 31 March 1995; Mr Ii. C. Taylor: comments on Document 1 of Circular 1: no date; and Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

Main access* points would require parking, education and toilet facilities.

(Mr F. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

There should be environmental interpretation material provided at prominent viewing sites, * such as Signal Hill.

(Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle: 51 March 1995; Mr H.C. Taylor: comments on Document 1 of Circular 1: no date; Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date; Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

Two types of education centres are suggested:

- (1) general public and reception centres, *eg* at Silvermine, the Upper Cableway and Cape Point; and
- (2) students' environmental centres with catering and overnight facilities.

(Mr H. C. Taylor: comments on Document 1 of Circular 1: no date).

Environmental education/interpretative centres should aim to engender a sense of the value of the mountain chain as a natural heritage for all generations present and future.

(Mr IL C. Taylor: comments on Document 1 of Circular 1: no date).

Education about the correct use of the mountain is important - perhaps signboards and regularly emptied rubbish bins at the start of every route would help.

(Ms P. Newby: letter to Sue Lane: 3 August 1993).

Self interpretation information and guided tours also need to be developed as a means of educating the people of Cape Town and national and international tourists*.

(Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

Developing educational materials is extremely important.

(Representative of civic organisation: CFPNE Interviews: 26-28 April 1993).

Signage should be used to educate the public.

(Mr W. van Warmelo, Habitat Council: comments on Document I of Circular 1: 30 April 1993; Representative of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Education, through interpretative centres and signboards, is the key to minimising the litter problem. *

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

* Indicates a cross-referral to another section

5.5 Research

There should be as little resource utilisation as possible, except for research purposes and recreational* activities based on sustainable use of these resources.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Restriction on development* and use should only apply to small areas of environmental and biological sensitivity and special research sites.

(Mr 11. C. Taylor: comments on Document I of Circular 1: no date).

Mountain conservation (no-go areas) could be managed for research and gene pools if scientists establish this is necessary.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

All important scientific and conservation areas should be protected in terms of the zoning* which discourages/prevents public access to protect the resource.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

The rights of access to the data need to be addressed.

(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993; Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993; Comments from meeting with Cape Provincial Administration: 12 March 1993; Mr C.H. Langley: commenting on Circular 1: 28 May 1995).

The location of the data should be addressed.

(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993; CPPIYB Managers Forum: issues identified at meeting: 24 March 1993).

There should be a central, accessible data-base.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993; Mr 11. C. Taylor: comments on Document I of Circular 1: no date).

The ownership/control of the data should be addressed.

(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993; and Senior City Council Staff: Main issues identified at meeting with Cape Town City Council: 12 March 1993; Comments from meeting with Cape Provincial Administration: 12 March 1995; Mr C.11 Langley: Letter commenting on Circular 1: 28 May 1993).

Copies of the data and information of public interest should be put in local libraries and municipal offices.

(Silvermine River Society: comments on Document 1 of Circular 1: no date).

The data should be stored at central offices of the managing authority and should be available to anyone who can assist meaningfully in any way to further the objectives of the CPF'NE.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular I: 2 April 1993).

• Indicates a cross-referral to another section

The management of data concerning the UTNE needs to be addressed.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

The compatibility of the data/information should be taken into consideration.
(Mr W. van Warrnelo, Habitat Council: comments on Document 1 of Circular 1: 30 April 1995).

The format in which the data is to be stored should be considered.
(Mr G. Boddington: personal comments on Document 1 of Circular 1: 10 June 1993; Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993; CPPIYE Managers Forum: issues identified at meeting: 24 March 1993).

The appropriate data should be stored as co-ordinated interlinked GIS.
(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

It is good that the emphasis is being placed on the preparation of a 'base line sensitivity map' which will hopefully identify conservation sites or areas that require priority management (whether these are rare plants/communities, historical/cultural sites or scenic/recreational areas).
(Mr C.H. Langley, Conservation Division of Western Cape Regional Services Council: letter in response to letter 7 September 1995 from the CPPIYE Project: 15 September 1993).

Now the data should be up needs to be examined.
(Senior City Council Staff: Main issues identified at meeting with Cape Town City Council: 12 March 1995; CPPIYE Managers Forum: issues identified at meeting: 24 March 1993).

Data collection should be routine.
(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

The updating should be *ad hoc* and based on events.
(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

The quality of data needs to be examined.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993; Mr C.11. Langley: commenting on Circular 1: 28 May 1995).

The collection of data and information should be based on the needs of management.
(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1995).

6. DEVELOPMENT

6.1 Development

There should be a moratorium on all proposed developments within the CFPNE until the policy is decided upon.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993; Mr A. Oubb: Wildlife Society of Southern Africa, Western Cape Branch: at CPPIYE Public Meeting: 5 August 1993 and in correspondence to Mr K. Meiring, The Administrator of the Western Cape: 51 August 1993; and Diana F. Wilson: letter to Rachel Wynberg: • 23 June 1993).

The integrity of the CPPIYE must be maintained - there must be no further development nodes.

(Mr P. Salter, Chairman Simon's Town flora Conservation Group: letter commenting on Circular I: 26 May 1993).

There should be no further development nodes in the Southern Peninsula.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

Any proposed development in the Peninsula must be subject to Integrated Environmental Management Principles.

(Committee for Land Usage and Transport Planning Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

There should be degrees of utilisation and development which could vary from area to area, from 'wild areas' to areas where limited development could be permitted.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

There is a 'strong feeling' that there should be no further residential or industrial developments within the UTNE. However it has to be realised that one has to pay for things to stay the same.

(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

A clear policy needs to be established for the use and development of presently restricted areas within the GPM (eg Orange-kloof, Back Table and Simon's Town Water Catchment).

(Mr P. Britton, Cape Town City Council: Official comments on Circular I: 25 June 1993).

A list should be drawn up of compatible developments.

(Silvenninen River Society and Mr J.C. Taylor: comments on Document 1 of Circular 1: no date).

There should be 'no-go' areas which exclude development and high intensity use.
(Silvermine River Society: comments on Document 1 of Circular 1: no date).

There should be no more development that will adversely impact the CPPIYE or its associated coastline, unless it can be clearly shown, through detailed need and desirability studies that the CPFNE and its associated communities will positively benefit from such planned activities.

(Mr A. aubb, Wildlife Society, Western Cape Branch: letter: 27 April 1993).

Present developments are unwise, unsightly and uncontrolled (eg Hoordhoek wetlands and associated coastline).

(Mr A. Oubb, Wildlife Society, Western Cape Branch: letter: 27 April 1993).

Development on the mountain is definitely an option.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

A hotel development on Table Mountain would only benefit the elite and would thus not be equitable.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

It is hoped that the policy exercise will not jeopardise or slow down the implementation of the Cape of Good Hope Nature Reserve's Management and Development Plan.

(Mr Cii. Langley, Conservation Division of Western Cape Regional Services Council: letter in response to letter 7 September 1993 from the CPPIYE Project: 15 September 1995).

While the environment is important, its utilisation must be maximised (eg Driftsands).

(Representative of civic organisation: CPPIYE Interviews: 26-28 April 1993).

Table Mountain is presently under-utilised.

(Representative of civic organisation: CPPIYE Interviews: 26-28 April 1993).

The study must be linked to metropolitan development needs.

(Representative of civic organisation: CPPIYE Interviews: 26-28 April 1993).

Development rights need to be recognised and compensated.

(Representative of local authority on the Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

Policy needs to be ahead of developers and landowners.

(Representative of local authority on the Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

6.2. Access

There should be broad public access to the CPPI15.

(Representatives of local conservation organisation and national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Controlling access to the CPPNE is not the answer.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

There has been a lack of adequately controlled access.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Access to the mountain should be controlled and planned.

(Mr A. Gubb, Wildlife Society Western Cape Branch: letter: 27 April 1993; Mr T. Keane, Chairman of the Environmental Sub-committee of the fish Hoek Residents Association: letter commenting on Circular 2: 2 August 1993; and Mr M. Clark Member of the Mountain Club of South Africa: letter to the Management Advisory Committee of Cape Peninsula Protected Natural Environment).

Access to the mountain should remain 'free'.

(Representative of civic association: CPPIYE Interviews: 26-28 April 1993).

There should be continued access to the CPPNE area for recreational* purposes.

(Mr A.N. Starkee: letter to Professor R.F. Fuggle: 4 August 1993).

If people are blocked from using an area they will not be pro its conservation.

(Representative of recreational organisation: CPPIYE Interviews: 26-28 April 1993).

Access to the CPPNE needs to be carefully planned so as to minimise clashes with nearby residents.

(Mr CL Boddington: commenting on Document 1 of Circular 1: 10 June 1993).

Access should be increased by footpath management, which would be largely confined to the Northern end of the CPPNE.

(Representative of recreation organisation: CFFIYE Interviews: 26-28 April 1993).

Access to the Back Table area around the reservoirs should be facilitated by the development of an appropriate form of conveyancing.

(Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle: 31 March 1993).

If access to the mountain is to be restricted two systems are suggested:

- (a) As in the case of Kirstenbosch (S.A. Botanical Society) those interested could purchase either life or annual membership. The money* so raised would permit the employment of rangers/wardens who could patrol the mountain monitoring the activities of those using it.
- (b) It would not be physically or economically possible to fence the mountain. Therefore, it is suggest that users buy a permit which provides them with access to the mountain at specific entry points. These funds* could be used to maintain mountain paths, restore fire or erosion damaged areas and enable replanting and conservation education to be undertaken.

(Mr A.IY. Starkee: letter to Professor R.F. Fuggle: 4 August 1993).

Certain areas, especially those which are degraded, should be off limits, which necessitates the fencing off of access paths and the placing of notice boards. In some cases this could be temporary until the area has recovered and can be reopened to the

public. Other areas could be permanently off limits with entry by permits only, thus preserving endangered species.

(Mr M. Clark, Member of the Mountain Club of South Africa: letter to the MAC of CPPIYE).

The need for adequate access points could influence boundary changes.

(Mr P.E. Blignaut:• letter to Sue Lane commenting on Circular 1: 2 April 1993).

There is a need to ensure that people of all ages have access to the mountain.

(Representatives of local council in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

A compelling way to instill the awareness of the mountain as a conservation priority issue is to improve access to the mountain, make access easier for the community. But, to make this increased access work for conservation, the access must be controlled.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Access needs to be increased for the Back Table as this area is already utilised.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Some areas on the Back Table could be developed as recreational areas (*eg* around Woodhead reservoir) with a shuttle bus/chair via Kirstenbosch/Cecilia.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

It would not be advisable to provide access for many people to the top of the mountain on the Back Table.

(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

Orangetkloof could be opened to the public if access was controlled.

(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

Tractor rides in certain areas should be permitted as they will provide access to the mountain in a controlled manner, as well as educating* the public who participate on the rides about the mountain. *

(Zeller Karro: letter to Professor R.F. Fuggle: 17 June 1993).

Cape Point Nature Reserve's entrance fee is prohibitively high.

(Ms S. Louw: letter to Environmental Evaluation Unit: no date; Representative of civic organisation: CPPIYE Interviews: 26-28 April 1993).

More people should use less of the mountain.

(Representatives of local council in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

There is a need to look at alternative access routes which could be 'disguised'.

(Representative of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

• Indicates a cross-referral to another section

The degree of access should depend on the carrying capacity of the area.
(Comments from meeting with Cape Provincial Administration: 12 March 1993).

Control (ie by whom and how) of access needs to be addressed.
(Comments from meeting with Cape Provincial Administration: 12 March 1995).

The most appropriate forms of access for each area need to be examined.
(Comments from meeting with Cape Provincial Administration: 12 March 1995).

Alternative forms of access to the CPPNE need to be found.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

Better access to the CPPNE needs to be provided for handicapped people.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

Entitlement rights (ie do the greater Cape Town communities have rights to free access to the mountain) need to be considered.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1995).

Access should be primarily by foot.
(Municipality in the Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

There is a need for uniform regulations relating to public access.
(CI:TM Managers Forum: issues identified at meeting: 24 March 1993).

Inexpensive and easy methods need to be found to control public access.
(CPPIYE Managers Forum: issues identified at meeting: 24 March 1993).

Public access from the urban fringe needs to be addressed.
(CPPIYE Managers Forum: issues identified at meeting: 24 March 1993).

People should be drawn into designated access areas, which also should have an educational* role.
(Municipality in the Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

No further access roads should be developed in the CPPNE.
(Representatives of local conservation organisation: CPPNE Interviews: 26-28 April 1993).

Tafelberg Road should be extended as an access route for cycling and walking. It should not be developed as a vehicular route. TORs would conflict with its present use for a shuttle service. •
(Representative of tourism organisation: CPPIYE Interviews: 26-28 April 1993).

Permits could be used to control access.
(Managers in the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993; CPPIYE Managers Forum: issues identified at meeting: 24 March 1995).

Entrance permits could act as sources of revenue*.

* Indicates a cross-referral to another section

(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993; CPPIYE Managers Forum: issues identified at meeting: 24 March 1993).

Adequate, main access points are important to develop.
(Mr P. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Main access points would require parking, education and toilet facilities*.
(Mr P. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Main access points could act as points of control and revenue" collection (le payment required).
(Mr P. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Access points other than the main ones on the mountain chain should be left rudimentary, with no direct controls (except maybe by honorary rangers).
(Mr P. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Six or so prime access points should be identified.
(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1995).

Possible access points could be Woodhead Dam, Silvermine and Constantiaberg.
(Representatives of local council in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

An access point should be developed at Kloofnek to funnel people to both Signal Hill and Table Mountain.
(Representative in local authority in Cape Peninsula: CPPIYC Interviews: 26-28 April 1993).

There should be expanded parking facilities* at main access points and a bus shuttle to take people to higher points (egup Constantia Nek).
(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Interpretation centres should be provided at key access points to the mountain, such as Kloof Nek.
(Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle: 31 March 1993; Mr I.C. Taylor: comments on Document 1 of Circular 1: no date; and Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

The mountain and other sensitive areas should not be open to vehicles for recreational* purposes.
(Mr P. Salter, Chairperson Simon's Town Flora Conservation Group: letter comments on Circular 1: 26 May 1993; Mr N C. Taylor: commenting on Document 1 of Circular 1: no date; and Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

There should be formal gateways into the CPPNE.
(Mr C. ff. Langley: Letter commenting on Circular 1: 28 May 1993).

Any access point should be self-maintaining.

* Indicates a cross-referral to another section

(Senior City Council Staff: main issues identified: March 1993).

Volunteers* could be used to control the access at main access points over week-ends.
(Mr P. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

Consideration should be given to the sorts of vehicular access which are permissible.
(Mr G. Boddington: personal comments on Document 1 of Circular 1: 10 June 1993).

6.3 Facilities

The cableway should not be owned by one company.
(Ms S. Louw: letter to Environmental Evaluation Unit: no date).

The future management and whether or not the cableway should remain a commercial venture which only benefits a few, needs to be examined.
(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Funds* from the cableway should be used to manage the CPPNE.
(Ms S. Louw: letter to Environmental Evaluation Unit: no date; and Professor C.L. Merry, Department of Survey and Geodetic Engineering, UCT: letter to Professor R.F. Puggle in response to article in Argus on 9 August 1993:18 August 1993; and Diana F. Wilson: letter to Rachel Wynberg in response to press release on 13 May 1993 and Circular 1: 23 June 1993).

There should be a doubling of the cableway and/or increasing the size of the cable cars, at the Table Mountain Cableway, to carry more passengers.
(Cape Town Chamber of Commerce: letter to Professor R.F. Puggle: 31 March 1993).

A cableway should be developed up Signal Hill.
(Cape Town Chamber of Commerce: letter to Professor R.F. Puggle: 31 March 1995).

An expansion of the present cableway infrastructure will harm the aesthetics* of the most attractive part of the mountain range. An alternative Waterfront - Signal Hill linkup to the mountain seems more acceptable.
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

The benefits of putting people on the mountain need to be carefully examined (*eg* the Cape Town City Council presently get more money from the kiosk than from the cableway).
(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

The present cableway construction is ugly and the visual* aspect is crucial.
(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1995).

The upgrading of the upper cableway station so that it was no longer an eyesore would be costly and therefore should only be considered if subsidies were offered.
(Representative of tourism organisation: CPPIYE Interviews: 26-28 April 1993).

Moving the upper cableway station back would inflict on TV aeriels etc which are buried behind it.

(Representative of tourism organisation: CPPIYE Interviews: 26-28 April 1993).

Funiculars should be considered for the cableway.

(Mr G. Boddington: commenting on Document 1 of Circular 1: 10 June 1993).

Another cableway at the present site is acceptable.

(Representative of tourism organisation: CPPIYE Interviews: 26-28 April 1993).

Another cableway from a different point is not acceptable as it would disrupt the panoramic view* too much.

(Representative of tourism organisation: CPPIYE Interviews: 26-28 April 1993).

There should be access by means of another cableway, preferably on the Western Table as this is already an ecological right-off.

(Representative of national conservation organisation: 26-28 April 1993).

If there was to be another cableway, it should end where the existing one is.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1995).

Another cableway would certainly compete with the present cableway, however a cableway up Signal Hill would not be in strict competition.

(Representative of tourism organisation: CPPIYE Interviews: 26-28 April 1995).

UCT should be proactive in seeing how the Signal Hill study fits in with the policy guidelines.

(Representative of local authority in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

The fares for the cableway are too low but it needs to be recognised that the South Africa is a developing country and thus fares need to be kept at a level that South Africans can afford.

(Representative of tourism organisation: CPPIYE Interviews: 26-28 April 1993).

A unified network of paths should be developed.

(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1995).

The public* could be used in the planning process* of the improvement of the paths.

(Ms S. Louw: letter to Environmental Evaluation Unit: no date).

The proposed trail along the length of the mountain chain should be developed.

(Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle: 51 March 1993; Mr IL C. Taylor: • comments on Document 1 of Circular 1: no date; and Mr P.E. Blignaut: • letter to Sue Lane commenting on Circular 1: 2 April 1995).

There is a need for a mixed path usage in certain areas, and other areas which are free (eg rock climbers).

(Municipality in the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

Problems relating to footpaths that need to be addressed are:

- uncontrolled access by public;
- lack of a unified plan for a network of paths;

- permit system, and
- user pays.

(CPPIYE Managers Forum: issues identified at meeting: 24 March 1993).

Policy is needed for the development of the walk tour from Signal Hill to Cape Point.
(Senior City Council Staff: main issues identified: March 1993).

A contour path should be added on the slopes of Swartkop Range to Murdock Valley.
(Mr H.C. Taylor: comments on Document 1 of Circular 1: no date).

The path system in Cape Point Nature Reserve should be increased.
(Mr N. C. Taylor: comments on Document 1 of Circular 1: no date).

A brick road should be considered so that all who wish to enjoy the mountain can do so.

(Representative of local council in Cape Peninsula CPPIYE Interviews: 26-28 April 1993).

Education*, especially in terms of maps is crucial, as there are too many access points to have control points dishing out maps.

(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

CPPNE maps should show official paths and visitor areas.

(Silvermine River Society: comments on Document 1: no date; Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle: 31 March 1993; Mrs D. Wilson: letter to the Cape Times: 8 April 1993; Mr H.C. Taylor: comments on Document 1 of Circular 1: no date; and Mr M. Clark, Member of the Mountain Club of South Africa: letter to the Management Advisory Committee of the Cape Peninsula Protected Natural Environment: no date).

The paths should be graded and their grading shown on the map.

(Silvermine River Society: comments on Document 1: no date; Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle: 31 March 1993; Mrs D. Wilson: letter to the Cape Times: 8 April 1993; Mr H.C. Taylor comments on Document 1 of Circular 1: no date; and Mr M. Clark, Member of the Mountain Club of South Africa: letter to the Management Advisory Committee of the Cape Peninsula Protected Natural Environment: no date).

Hazardous areas/paths should be clearly marked on a map.

(Silvermine River Society: comments on Document 1: no date; Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle: 31 March 1993; Mrs D. Wilson: letter to the Cape Times: 8 April 1993; Mr H.C. Taylor: comments on Document 1 of Circular 1: no date; and Mr M. Clark, Member of the Mountain Club of South Africa: letter to the Management Advisory Committee of the Cape Peninsula Protected Natural Environment: no date).

Maps indicating hazardous areas and paths should be made available to the public and should also be displayed at major access points.

(Silvermine River Society: comments on Document 1: no date; Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle: 31 March 1993; Mrs D. Wilson: letter to the Cape Times: 8 April 1993; Mr H.C. Taylor: comments on Document 1 of Circular 1: no date; and Mr M. Clark, Member of the Mountain Club of South Africa: letter to the Management Advisory Committee of the Cape Peninsula Protected Natural Environment: no date).

• Indicates a cross-referral to another section

All paths, especially on the mountain slopes should be hardened.
(Mr P.E. Elignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Footpaths need to be properly constructed, if they are to be heavily utilised.
(Representative of recreation organisation: CPPNE Interviews: 26-28 April 1995).

The footpaths that have high intensity use should be upgraded.
(Silvermine River Society: comments on Document 1 of Circular 1: no date; Cape Town Chamber of Commerce: letter to Professor R.P. Fuggle: 31 March 1993; Mr ff.C. Taylor: comments Document 1 of Circular 1: no date; and Mr F.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

The paths should be adequately sign-posted, especially areas that are hazardous.
(Silvermine River Society: comments on Document 1 of Circular 1: no date; Cape Town Chamber of Commerce: letter to Professor R.P. Fuggle: 31 March 1995; Mr H. C. Taylor: comments on Document 1 of Circular 1: no date; Mrs D. Wilson: letter to the Cape Times: 8 April 1993; Mr M. Clark, Member of the Mountain Club of South Africa: letter to the Management of Cape Peninsula Protected Natural Environment: no date; and Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

If the Back Table was to be developed as a facility, then the lower level paths could be upgraded to enhance access.
(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

People should be kept on paths and off the steep areas.
(Mr F.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

New paths should only be constructed in stable areas.
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Horse riding should be permitted but only in certain parts where the paths are able to withstand the extra pressure and are not likely to become eroded.
(Mr M. Clark, Member of the Mountain Club of South Africa: letter to the Management Advisory Committee of Cape Peninsula Protected Natural Environment: no date).

Heavy fines should be imposed if people are found off the paths.
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

Benches should be placed along the paths for walkers.
(Ms S. Louw: letter to Environmental Evaluation Unit: no date).

If overnight huts and additional hiking trails were controlled then they would be acceptable.
(Managers of the Cape Peninsula: CFP1YE Interviews: 26 - 28 April 1995).

The signage for paths needs to be effective (*eg* different colours indicating different paths, or names of paths, like in the Drakensberg).
(Municipality in the Cape Peninsula: CFP1YE Interviews: 26 - 28 April 1993).

Other utilisations of the CPPNE that should be considered are the sandpits. agriculture and aquaculture.

* Indicates a cross-referral to another section

(Mr P.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

It is essential to have an integrated radio net for the Peninsula.
(Representative of local conservation organisation: CPPNE Interviews: 26-28 April 1995).

There is a need to expand certain recreational and tourism* facilities in the CPPNE.
(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPNE Project by Chief Executive Officer: 8 September 1995).

The natural beauty* of the mountain chain will not necessarily benefit the tourism industry and generate tourism income if the attractions and facilities do not meet the needs of the tourist. *
(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Comments from meeting about CPPNE Project: 29 September 1993).

Amenity servicing in the CPPNE should be self-sufficient (eg use sun/wind energy).
(Mr P. de Tolley, Deputy City Planner: Comments on Circular 1: 7 May 1993).

Stormwater drainage is an important aspect of water* management.
(Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

There will need to be a stormwater management plan which controls flooding, reduces flood peaks, and limits silt and debris transfer into adjacent and lower lying urban development areas, especially after fires*.
(Mr N.B. Lief, City Engineer: Letter commenting on Circular 2: 13 September 1993).

The collection and disposal of solid and liquid waste needs to be considered (eg Upper Table Station and Silvermine toilets).
(Mr P. de Tolley, Deputy City Planner: comments on Circular 1: 7 May 1993).

Parking areas are important in providing accessibility to the CPPNE.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

All electricity and telephone cables should be placed underground.
(Mr IL C. Taylor: comments on Document 1 of Circular 1: no date).

The erection of aerials (eg TV, radio, phone repeaters, military) needs to be carefully considered in the policy guidelines.
(Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

Moving the upper cableway station back would inflict on TV aerials etc which are buried behind it.
(Representative of tourism organisation: CPPNE Interviews: 26-28 April 1995).

6.4 Boundary Changes

Public input* is crucial re: amendments of the boundaries.

* indicates a cross-referral to another section

(Member of public at CPPIYE Public Meeting: on 3 August 1993).

The boundaries of the CPPNE should be guided by the area's ecological value.
(Mr P.E. Blignaut: • letter commenting on Circular 1: 2 April 1993).

The boundaries of the CPPNE should be guided by the area's societal value (k its ability to provide recreational opportunities; solitude; benefit to commerce and tourism; existence as a pollution free lung; the scientific and genetic value of the mountain's diverse natural resources; development on 'appropriate' land).
(Mr P.E. Blignaut: letter commenting on Circular I: 2 April 1993).

The boundaries of the CPPNE should be guided by the visual impact that development will have on a specific area (eg Elsie's Peak, where development to the 150m contour has resulted in the urbanisation of half the mountain in the vertical sense).
(Mr P.E. Blignaut: letter commenting on Circular I: 2 April 1993).

The boundaries of the CPPNE should be guided by existing development.
(Mr P.J. Blignaut: letter commenting on Circular I: 2 April 1993).

The boundaries of the CPPNE should be guided by land rights.
(Mr P.E. Blignaut: letter commenting on Circular 1: 2 April 1993).

The boundaries of the CPPNE should be guided by the steepness of the land and its susceptibility to erosion, movement and scarring.
(Mr P.E. Blignaut: letter commenting on Circular 1: 2 April 1993).

For this study, it is suggested that the boundaries should be confined to the topographical chain.
(Representative of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Will the CPPNE boundary be cut off from the coastline? It should'nt, because trek-netting is an important form of tourism.
(Member of public at CPPNE Public Meeting: 3 August 1993).

The practical management implications of boundary changes need to be considered.
(511vermine River Society: comments on Document 1 of Circular 1: no date).

A study needs to be done regarding the financial* implications of extending the CPPNE boundaries.
(Representative of local conservation organisation: CPPNE Interviews: 26-28 April 1993).

Management, control, prosecution etc must be done effectively on existing land before extending the boundaries.
(Mr I. Browlie, Ashley Lilly, Mark Wiley, South Peninsula Environment Forum: CPPIYE Interviews: 26-28 April 1993).

The boundary of the CPPNE should be made more responsive to the topography.
(Peter M. Adams: letter to Sue Lane: 11 August 1993).

* Indicates a cross-referral to another section

Environmental continuums (*eg* along river corridor from source to sea) need to be developed.

(*Silvermine River Society: comments on Document 1 of Circular 1: no date; Representatives of local council in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993*).

Open spaces could be joined to the CPPNE and be public.

(*Representatives of local council in Cape Peninsula: CFP1YE Interviews: 26-28 April 1993*).

The CPPNE should be extended into the coastal/marine zone, where appropriate and feasible.

(*Mr A. Gubb, Wildlife Society, Western Cape Branch: letter: 27 April 1995*).

The CPPNE boundaries should include sensitive beach areas.

(*Representatives of local conservation organisations: CPPIYE Interviews: 26-28 April 1993*).

It is suggested that the river source should be used as the Western boundary and the sea for the rest of the Peninsula.

(*Mr B. Manus, S.A. Ornithology Society, Cape Bird Club and Friends of the Liesbeek:• letter commenting on Document 1 of Circular 1: 21 June 1993*).

The municipal land above presently existing town plans should be incorporated into the CPPNE.

(*Mr IL C. Taylor: comments on Document 1 of Circular 1: no date*).

Not all the developed areas need to be excluded from the CPPNE.

(*Mr R. tfulley, Fairest Cape Association: telephone conversation: on 29 April 1995*).

The need for adequate access* points could influence boundary changes.

(*Mr P.E. Blignaut:• letter to Sue Lane commenting on Circular 1: 2 April 1993*).

Scenic* considerations should be used as criteria for boundary changes. "

(*Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1: no date*).

The CPPNE should be redefined to include both urban and marine areas (*le* the whole Peninsula).

(*Mr A. Gubb, Wildlife Society, Western Cape Branch: letter: 27 April 1995*).

The following areas should be considered for inclusion in CPPNE: Dido Valley; Botha's Camp; hills behind Kommetjie, Capri Village and Sunnydale; the northeastern portion of the Noordhoek Wetlands (area below the 5m contour and up to the present development); and the Oudekraal area.

(*Mr P. Adams: letter to Sue Lane: 11 August 1995*).

Botha's Camp area on Redhill, Simon's Town Municipal land, originally excluded from CPPNE, should be incorporated into the CPPNE (approx. 90 ha rich fynbos with few aliens).

(*Mr P. Salter, Chairman Simon's Town Flora Conservation Group: letter commenting on Circular 1: 26 May 1993*).

It is imperative that Botha's Camp be incorporated into the CPPNE, not only because of

* Indicates a cross-referral to another section

its latent wealth of plant species (the remarkable diversity of geophyte plants, especially Orchidaceae) and related organisms, but also due to it being a naturally rich valley floor habitat.

(Dr W.R. Laved, presently researching geophyte plants of the Cape Inbos Biome: letter to John Cobbey, Chairman of MAC: 9 December 1992).

The area on the upper slopes of Elsies Peak that has been zoned for development up to the 152m contour, should be considered for inclusion within the CPPNE because of its major scenic importance and linkage to the CPPNE. It is suggested that this land between the present developed areas and the CPPNE be made into a fynbos reserve that could become a major tourist attraction and investment for the future.

(K.R. Maughan-Brown, Secretary of Think Tank Elsie's Peak Project, fish Hoek Residents Association: letter to the CPPIYE project: 31 July 1993).

The boundaries of the CPPNE need to be reviewed.

(Comments from meeting with the Western Cape Regional Services Council: March 12 1993).

There are several areas in the Peninsula which are presently outside the CPPNE boundary but may need to be included in the CPPNE.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

The CPPNE boundaries need to be rationalised (refer to Kahn).

(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993).

Boundaries should not be extended before the work in the present area is completed.

(Municipality in the Cape Peninsula: CPPNE Interviews: 26 28 April 1993).

Changing the CPPNE boundaries needs to include the continuity of the landscape between sea and mountain crest.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPNE Project by Chief Executive Officer: 8 September 1993).

There is a need to identify where the CPPNE boundary should be, how it should be managed, and who should manage it.

(Comments from meeting with Cape Provincial Administration: 12 March 1993).

The change of boundaries should be seen in the light of the need to cope financially with an even greater area and the danger of being less effective with a spread of strained resources.

(Chief Executive/Town Clerk, Municipality of Simon's Town: Letter to Professor R.F. Fuggle in response to his letter the 7 September 1993: 21 October 1993).

There needs to be public involvement' in determining the boundaries.

(Comments from meeting with the Western Cape Regional Services Council: March 12 1993).

Robben Island should be incorporated into the CPPNE.

(Mr R.J. Horn, Director of Civic Amenities, City Administration Department; letter to the Director of Parks and Forests commenting on Circular 1: 1 June 1993• Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CFPIYE Project by Chief Executive Officer: 8 September 1995; Representative of civic organisation: CPPIYE Interviews: 26-28 April 1993; Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular I: 29 April 1993).

Sandy Bay should be included within the CPPNE.

(Municipality in the Cape Peninsula: CPPNE Interviews: 26 - 28 April 1993).

The CPPNE boundary should be extended to include the Silvermine River downstream of the current boundary.

(Kim Kruyshaar, Silvermine Valley Coalition Co-ordinator: letter to Sue Lane: 1 February 1994).

Inclusion of marine areas would strengthen the protection status of the CPPNE.

(Comments from meeting with Cape Provincial Administration: 12 March 1993).

Stone quarries and sand pits should be included in the CPPNE.

(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

Development on the mountain slopes should be reconsidered on the basis of a ratio of the permitted building line to the elevation of the mountains. The 152m restriction may be reasonable for Table Mountain but ridiculous when applied to the maximum elevation of 305m such as Elsies Peak. The resulting island of fynbos is sustainable in the long term.

(Mr 7'. Keane, Fish Hoek Alien Vegetation Control Group: letter commenting on Circular 1: 18 May 1993).

The boundaries of the CPPNE should be along ecological and land-use lines not arbitrary cadastral lines.

(Mr R. Hulley, Fairest Cape Association: telephone conversation: 29 April 1993).

Further building higher up the slopes and on the parts at present free of buildings should be prohibited.

(Miss C. Enington: letter: 51 July, 1993).

The review of the 152m contour is important.

(Mr T. Keane, Chairperson of the Environmental Sub-committee of Fish Hoek Residents Association: letter commenting on Circular 2: 2 August 1995; Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPNE Project by Chief Executive Officer: 8 September 1993).

A pragmatic approach should be used towards adopting cadastral lines as the basis for boundaries.

(Mr P.E. Blignaut: letter commenting on Circular 1: 2 April 1993).

Mountain zonation above a realistic, agreed altitude (not necessarily 152m) should be legally entrenched.

(Mr 11.C. Taylor: comments on Document 1, Circular 1: no date).

6.5 Land Ownership

The urban fringe of the CPPNE is highly problematic.
(Comments from the Managers Forum Meeting: 28 July 1993).

There is a need for a transition zone on the nature/urban interface zoning.
(Mr P. Britton, Cape Town City Council: official comments on Circular 1: 25 June 1993).

Landscaping of the urban-natural fringe and integration of trees into the residential/urban fabric is important in establishing a link between the urban and the natural. The urban-natural edge must be defined visually*.
(Ms S. Ilustwick and Ms M. Atwell, Urban Conservation Unit suggestions, Cape Town City Council: 21 September 1993).

It is important to know what is happening around the Peninsula in relation to informal settlements.
(Representatives of civic organisation: CPPNE Interviews: 26-28 April 1993).

Location of squatter settlements is paramount.
(Representatives of informal settlements in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

Being close to the resources of the CPPNE (eg water, wood) is not generally important for squatters.
(Representatives of informal settlements in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

It is crucial to provide low income housing, otherwise people form informal settlements.
(Representatives of informal settlements in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

When designating sites for squatters, work opportunities need to be examined. If these are identified, a site for the squatters is required.
(Representatives of informal settlements in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

It is important to provide initial sites to prevent 'territoriality'
(Representatives of informal settlements in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

Once people have settled they cannot be moved, therefore the policing of informal settlements is very important.
(Representative of civic organisation: CPPNE Interviews: 26-28 April 1993).

People do not move to the mountain because they want to. They use the topography and the vegetation as a refuge to get away from the local authorities and the police.
(Representative of civic organisation: CPPNE Interviews: 26-28 April 1993).

* Indicates a cross-referral to another section

Distractions need to be developed to draw potential informal settlements away from the mountain.

(Representative of civic organisation: CPPIYE Interviews: 26-28 April 1993).

Trees* provide a hiding place, shelter and fuel for squatter communities.

(Representatives of informal settlements in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

There is a real need for a settlement site at Fish Hoek.

(Representatives of informal settlements in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

Informal settlement should not be on C.F. 1404, but **on Perdekloof and/or Dido Valley** (Mr P. Salter, Chairman Simon's Town Flora Conservation **Croup: letter commenting on Circular 1: 26 May 1993).**

There needs to be a clear policy on squatter settlements in and around the CPPNE.
(CPPIYE Managers Forum: Issues identified at meeting: 24 March 1993).

20% of CPPNE land is privately owned and there needs to be extreme caution about 'pushing landowners around' or expropriating land.

(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1993).

Policy on the development of private land needs to be stated.

(Representative of local authority in Cape Peninsula: CPPTIE Interviews: 26-28 April 1993).

If land is considered crucial to incorporate into the CPPNE, this should be done on an issue-by-issue basis.

(Representative of government conservation department: CPPNE Interviews: 26-28 April 1993).

People have to be compensated to prevent further land degradation.

(Representative of government conservation department: CPPNE Interviews: 26-28 April 1993).

Private landownership does accord greater control (*eg* squatters) but this needs to be balanced against prospective developments.

(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1993).

The CPPIIE should be seen as a public asset.

(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Unless there is an authority with executive powers it is pointless to expropriate land.

(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Private landownership in the CPPNE should be questioned as people do not buy land to do nothing with it.

* Indicates a cross-referral to another section

(Representatives of local conservation organisation: CPPPIE Interviews: 26-28 April 1993).

Private landowners should be made 'honorary conservation officers'.

(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

There is at present no pro-active management of private land (*eg* the only time there is any communication between private landowners and Management Advisory Committee is when they wish to develop).

(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1995).

Environmentally sensitive areas should not be developed, even if they are on privately owned land.

(Mr T. Keane, Ks h Hoek Alien Vegetation Control Group: letter commenting on Circular 1: 18 May 1993).

All private land should be expropriated and the land sold to a capital Trust to prevent the 'Sandy Bays' *etc.*

(Representatives of local council in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993)

Some eco-friendly agricultural' activities could be allowed on private land within the CPPNE (*eg* medicinal plant nurseries, harvesting and fynbos cultivation).

(Mr P.E. Blignaut: Letter to Sue Lane commenting on Circular 1: 2 April 1995).

There is concern that with a new government public land may not necessarily be protected.

(Representative of local council in Cape Peninsula: CPPNE Interviews: 26-28 April 1993)

The onus should be on landowners adjacent to the CPPNE to take fire' precautions (*eg* design of houses).

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date; Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

There is a question of how to control the area from Fish Hoek to Cape Point, as it is a mish-mash of interests, especially private.

(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

The perception is that a major problem has been with the multi-ownership of the mountain and conflict between private landowners and authorities; private landowners and private landowners; and authorities and authorities.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

There should be no sub-division below 21.5 ha. The current building limits should be maintained.

(Mr P. Salter, Chairman Simon's Town Flora Conservation Group: letter commenting on Circular 1: 26 May 1993).

No further subdivisions should be allowed south of the Murdock Valley.

¹ indicates a cross-referral to another section

(Mr D. Newton, Chairperson of Smitswinkel Bay Residents' Association and Water Syndicate: in letter to Mark Callaghan: 10 June 1993).

Private landowners should continue to hold property on the present basis, but subject to regulation and control by the Management Committee.

(Cape Town Chamber of Commerce: letter to Professor B.F. Fule: 51 March 1993).

When land is sold its status within the CPPNE must be entrenched.

(Mr Jfa Taylor: comments on Document 1 of Circular 1: no date).

All land in the CPPNE should eventually become public land.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

If private land is sold then it should become subject to title deed to the management decisions of the managing authority.

(Mr P.E. Blignaut:• letter to Sue Lane commenting on Circular 1: 2 April 1995).

Mountain land should be ceded to the public authority if subdivisional and development rights are granted over land below the designated CPPNE boundary.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Development at Smitswinkel Bay is undesirable both from environmental considerations and from the preservation of the rustic atmosphere within the Valley.

(Mr D. Newton, Chairperson of Smitswinkel Bay Residents' Association and Water Syndicate: letter to Mark Callaghan: 10 June 1993, and Dr L. Hutchings, letter to Mark Callaghan, 5 July 1993; and letter to Rachel Wynberg:• 20 August 1993).

Development at Smitswinkel Bay will increase alien vegetation expansion; increase security and litter problems; impact the limited carrying capacity of the amenities and resources; and deplete the marine life.

(Mr D. Newton, Chairperson of Smitswinkel Bay Residents' Association and Water Syndicate: letter to Mark Callaghan: 10 June 1993, and Dr L. Hutchings, letter to Mark Callaghan, 5 July 1993,• and letter to Rachel Wynberg: 20 August 1993).

The CPPNE should be regarded as a national and international asset. Therefore it should have the commitment of public good.

(Mr P.A. Pehrson, Development Promotion, Small Development Corporation Ltd• letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1995).

Private development of the CPPNE should be allowed in a controlled way.

(Municipality in the Cape Peninsula: CPPNE Interviews: 26-28 April 1995).

Private development could be used to help control alien vegetation* (eg focusing development on the perimeters of the CPPNE).

(Municipality in the Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

Private landownership and the management of adjacent public land needs to be examined.

(Comments from meeting with the Western Cape Regional Services Council: March 12 1993).

The ecological management of private land needs to be addressed as does the need to obtain commitments from private landowners.

(Comments from meeting with the Western Cape Regional Services Council: March 12 1993; J.Z. Lensing Chief Director of Cape Nature Conservation: letter to Sue Lane identifying issues related to CPPNE Policy Guidelines: 5 April 1993).

The purchasing of private land by the Regional Services Council needs to be examined.
(Comments from meeting with the Western Cape Regional Services Council: March 12 1993).

The issue of consolidated ownership needs to be addressed.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

There should be a flexible position regarding land swaps in the CPPNE.
(Senior City Council Staff: Main issues identified at meeting with Cape Town City Council: 12 March 1993).

A rationalisation of some sort regarding land in the CPPNE would be required regardless of political structures
(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993).

Because of the pressures inherent in private ownership related to the pressures to make money, public land should not become privately owned.
(Municipality in the Cape Peninsula: CPPNE Interviews: 26 28 April 1993).

The leasing of rights to third parties needs to be addressed.
(Mr F. Britton, Cape Town City Council: official comments on Circular 1: 25 June 1995).

Rights of private landowners is a source of conflict.
(Comments from meeting with Cape Provincial Administration: 12 March 1993).

There needs to be an awareness of the mistakes of the past related to private landownership within the CPPNE (*eg* cableway lease too long; no money from the cableway channelled back to conservation).
(Managers of the Cape Peninsula: CPPNE Interviews: 26 28 April 1993).

The policy for leased areas needs to be reviewed. At present it is open to misuse.
(CPPNE Managers Forum: Issues identified at meeting: 24 March 1993).

The legal status of private land within the CPPNE needs to be clearly defined.
(CPPIYB Managers Forum: Issues identified at meeting: 24 March 1993).

The legal obligations of landowners adjacent to the CPPNB needs to be addressed (*eg* fire protection). *
(Mr P. Britton, Cape Town City Council: official comments on Circular 1: 25 June 1993).

* Indicates a cross-referral to another section

Individual's legal right versus community rights (Zonations/land-use categories) need to be addressed in the legislation.

(Mr A. Qubb, Wildlife Society, Western Cape Branch: letter: 27 April 1993).

It is crucial to consider past land claims within the CPPNE.

(Member of public at CPPIYE Public Meeting: on 3 August 1993).

There is an elitism associated with the CPPNE, *ie* the legacy of Apartheid - not OUR mountain, but YOUR mountain'. This has resulted in disadvantaged communities regarding the CPMC as a symbol of oppression. This perception needs to be addressed.

(Mr A. Gubb, Wildlife Society, Western Cape Branch: letter: 27 April 1993).

7. FUNCTIONAL AREAS

There should be zoning in the CPPNE.

(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

There seems to be considerable backing for a zoning system for the mountain to allow for multiple use of the CPPNE.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

Zoning on the mountain requires extensive public participation.

(Member of public at CPPIYE Public Meeting: Tuesday 3 August 1993; and Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

The zones must be strictly enforced with no appeals or departures allowed *ie* effective control.

(Mr E. Manus, representing S.A. Ornithology Society, Cape Bird Club and Friends of the Liesbeek: letter commenting on Document 3 of Circular 1: 21 June 1993).

Zoning is key to the policy.

(Member of public at CPPIYE Public Meeting: Tuesday 3 August 1995).

It is hoped that the UCT study will strengthen the arms of authorities dealing with land-use rezoning development proposals.

(Comments from meeting with the Western Cape Regional Services Council: March 12 1993).

The existing zoning scheme and regulations need to be reviewed.

(Comments from meeting with the Western Cape Regional Services Council: March 12 1993).

Zones should be created by the management bodies.

(Mr E. Manus, representing S.A. Ornithology Society, Cape Bird Club and Friends of the Liesbeek: letter commenting on Document 3 of Circular 1: 21 June 1995).

There is a need to consolidate existing conservation areas.

(Representative of local authority of Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

Most private land in the CPPNE carries a rural zoning which is not suitable for conservation. The suggestion should be made to the RSC and other relevant local authorities that a conservation zone be introduced into their town planning schemes.
(Mr P. Adams: letter to Sue Lane: 11 August 1993).

A guide plan to define conservation zones to preserve visual* and biological* integrity could be the following: core zone, limited development, dense development.
(Mr P. Britton and Mr J. Jacklernan: personal comments on Circular 1: no date).

Recreation and tourism* use of the CPPNE should be based on the entrenched function of the area.
(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

There are some areas that should be 'sacrificed', but somewhere a line needs to be drawn.
(Representative of recreation organisation and local conservation organisation: CPPNE Interviews: 26-28 April 1993).

It is essential to have a plan of different areas of zoning from this study.
(Representative of local authority in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

Past zonings are a major cause of poor developments within the CFPNE.
(Mr A. Qubb, Wildlife Society, Western Cape Branch: letter: 27 April 1993).

Urban zoning should accommodate the zoning of the proposed CFPNE, and amendments to relevant urban structure plans should obtain the approval of the CPPNE authorities.
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

All cultural, historical, archaeological, geological and spiritual places and areas should be determined and protected in terms of Mountain Feature Zoning which permits public under strict control.
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

There must be elasticity in the zoning regulations.
(Comments from meeting with the Western Cape Regional Services Council: March 12 1993).

The extent and nature of the zoning needs to be examined.
(Comments from meeting with the Western Cape Regional Services Council: March 12 1993).

There need to be legal mechanisms to zone within the CPPNE.
(Comments from meeting with the Western Cape Regional Services Council: March 12 1993).

Mineral* rights should be included as a criteria for zoning within the CPPNE.
(Mr W. van Warmelo, Habitat Council: comments on Document 1 of Circular 1: 30 April 1993).

* Indicates a cross-referral to another section

There is a need to declare consoli conservation areas into a contractual national park.
(Representative of local authority of Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

The zoning of the CPPNE should make it people-friendly *eg* could have an easily accessible recreational zone: a buffer zone with a few trails; and beyond this a proper nature reserve which would act to 'entice' people.
(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

The CPPNE should be declared a low development area.
(Mr E. Ti/anus, representing S.A. Ornithology Society, Cape Bird Club and Friends of the Liesbeek: letter commenting on Document 3 of Circular 1: 21 June 1993).

There should be zero based zoning and development planning.
(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

There is a need to develop 'honeypots' to attract tourists' to generate income* and preserve the visual integrity' of the area.
(Representative of local authority in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

Zoning should provide for multi-usage.
(Comments from meeting with Cape Provincial Administration: 12 March 1993; Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Multiple use should be limited to environmentally and aesthetically acceptable' sites.
(Mr If.C. Taylor: comments on Document 1: no date).

Sacrosanct areas should be included in zoning scheme.
(Comments from meeting with Cape Provincial Administration: 12 March 1993).

There should be ecosystem zoning, as ecological aspects in the CPPNE require a strong emphasis.
(Comments from meeting with Cape Provincial Administration: 12 March 1993).

The mountain should be zoned for multiple use, and not exclusively for nature protection'.
(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

There should be graded land-use zones.
(Mr R. Ifulley, Fairest Cape Association: telephone conversation: 29 April 1995; Representative of local authority of Cape Peninsula: CPPIYE Interviews: 26-28 April 1993)

Areas should be graded into sensitive 'nogo' areas.
(Representative of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

* Indicates a cross-referral to another section

A greater usage of the mountain is necessary, but this should only be in certain areas.
(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

Infrastructural* development should only occur where absolutely essential. These should be related to zoned areas and INFRASTRUCTURAL CORRIDORS.
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Different types of zoning and development rights could exist within the boundary* of the CPPNE (eg separate nature reserves from the rest of the CPPNE).
(Comments from meeting with the Western Cape Regional Services Council: March 12 1993).

There should be degrees of utilisation and development* which vary from area to area, from 'wild areas' to areas where limited development could be permitted.
(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

The CPPNE should be redefined to have (a) a core conservation area and (b) a low intensity development/buffer zone incorporating private areas.
(Managers of the Cape Peninsula: CPPNE Interviews: 26 28 April 1993).

The conservation of the core area and other areas classified within this area, is a priority.
(Managers of the Cape Peninsula: CPPNE Interviews: 26 - 23 April 1993).

There is a need for a mixed path usage in certain areas, and other areas which are free (eg rock climbers). *
(Municipality in the Cape Peninsula: CPPIYE Interviews: 26 28 April 1993).

The natural units for dividing the Peninsula would be Constantia Valley through to Hout Bay, Llandudno, excluding Silvermine. The division could be at Constantiaberg, not fish Hoek. (Not certain if the Karbonkelberg should be included in the 'unit').
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

The concept of graded development, in which the core is pristine wilderness, surrounded by a limited development area (eg hiking trails), which in turn is surrounded by more tourist* type development, has much appeal. The CPPNE is too small for this concept to be applied in this form. It may be necessary to allow more developments on the periphery (eg a Peninsula Hiking Way, the Waterworks Museum).
(Professor C.L. Men Department of Survey and Geodetic Engineering UCT: letter to Professor R.F. Tuggle in response to article in Argus on 9 August 1993: 18 August 1993).

The Biosphere Concept, which provides for appropriate low-key development, should be used to help in zoning the CPPNE.
(Mr I.I.C. Taylor: comments on Document 1 of Circular 1; and Mr A. Gubb, Wildlife Society, the Western Cape Branch: letter: 27 April 1993).

All important scientific and conservation areas should be protected in terms of the zoning which discourages/prevents public access to protect the resource.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular I: 2 April 1995).

The area should be available for a large number of users, but this should be based on the principles of a zoning plan and controlled access. The former could spell out the concept of core areas and buffer areas, including entire range of zones from so-called 'Wilderness' or 'primitive' areas, to intensive use areas.

(Mr M.D. Geldenhuys, General Manager (Environmental Management) of National Parks Board: letter to Sue Lane: 18 June 1995; and Mr P.E. Blignaut• letter to Sue Lane commenting on Circular 1: 2 April 1995).

Horse riding should be permitted but only in certain parts where the paths are able to withstand the extra pressure and are not likely to become eroded.

(Mr M. Clark, Member of the Mountain Club of South Africa: letter to the Management Advisory Committee of Cape Peninsula Protected Natural Environment: no date).

Mountain-bikers, para- and hang-gliders should have special areas allocated to them to avoid user-conflict.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular I: 2 April 1993).

There needs to be grades of allowable development on the urban fringe.

(Representative of local authority in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

Development* should be limited on adjacent and nearby land.

(Silvermine River Society: comments on Document I of Circular I: no date).

There should be buffer areas between the natural environment and transition zones.

(Silvermine River Society: comments on Document 1 of Circular I: no date).

Transition zones in appropriate areas could include cottage and craft industries.

(Mr IL C. Taylor: comments on Document 1 of Circular 1).

A complete attitude to the built-natural interface/ transition zone, is needed *ie* can't simply have urban planning laws/controls operating up to a fence and then have a natural area need to be evolved. There need to be special approaches to areas which are now (1) built against natural areas, and (2) quasi natural areas up against natural areas, *etc*

(Mr G. Boddington: personal comments on Document I of Circular I).

Careful consideration needs to be given to the management of specific problems related to the urban fringe. A new urban fringe needs to be designed that is compatible with the adjoining natural areas.

(Mr F. Britton and Mr J. Jackleman: personal comments on Circular I: no date).

The issues that need to be considered on the boundary interface are:

- (a) Social and cultural* environments,
- (b) Demographic considerations,
- (c) Economic transport routes,
- (d) Recreational* transport routes.

(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation LTD: letter to Rachel Wynberg commenting on Document I of Circular 1: 29 April 1993).

• Indicates a cross-referral to another section

Houses near the interface should be made unobtrusive; minimal cut/fill; shared driveways on steep land; fynbos gardens where land is seen from below; trees covering roads, etc.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Industry on the fringe is a concern eg Main Road, Simonstown: oil refinery (smell, aesthetics, smoke).

(Mr G. Boddington: personal comments on Document 1 of Circular 1: 10 June 1995).

There is a need for a transition zone on the nature/urban interface. *

(Mr F. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

8. ADMINISTRATION

8.1 General

One of the major problems is that the present administration is too fragmented.

(Representative of recreation organisation: CPPNE Interviews: 26-28 April 1993).

An enormous amount of time is presently spent trying to co-ordinate efforts.

(Representative of recreation organisation: CPPNE Interviews: 26-28 April 1993).

Different authorities have different perceptions of the problems and the boundaries*.

(Representative of recreation organisation: CPPNE Interviews: 26-28 April 1993).

There has been a lack of a single set of guidelines which has precluded effective management.

(Representative of national conservation organisation: CPP1YE Interviews: 26-28 April 1993).

There has been an absence of day-to-day management of the CPPNE.

(Representative of national conservation organisation: CPFIYE Interviews: 26-28 April 1993).

CPPNE is too long. 'Peninsula Mountain' is suggested.

(Mr Cl. Boddington: personal comments on Document 1 of Circular 1).

The Management Advisory Committee is perceived to be a non-elected, non-accountable body.

(Representative of local council in Cape Peninsula: CFF1YE Interviews: 26-28 April 1993).

At present, the Authorities are not accountable to the public.

(Member of the Public: South Peninsula Environmental Forum Public Meeting: 25 August 1993).

One of the major problem with Management Advisory Committee is that there is no permanent staff member to put things into effect.

(Representative of government conservation department: CFP1YE Interviews: 26-28 April 1993).

* Indicates a cross-referral to another section

Pretoria and the Administrator are too remote to really know the issues related to the CPPNE.

(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1993).

Present problems of the management structure are

- interference of politicians in the day to day management
- complicated line functions
- outside bodies overlapping and duplicating functions
- outside bodies policies conflicting with management policy.

(CPPIYE Managers Forum: Issues identified at meeting: 24 March 1993).

There is at present no effective policy guiding the management of the mountain chain.
(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

There is agreement that the present administrative system is fragmented and legally weak, preventing effective management.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

The existing Management Advisory Committee has not worked as it lacks credibility with 'groups out there', including authorities such as the Regional Services Council and Cape Town City Council.

(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

There is no clarity as to what the people in the Management Advisory Committee's roles are.

(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1995).

The management of the mountain is a metropolitan and national issue.

(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993).

The controlling body must have executive powers.

(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1995; Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

There should be a single controlling authority.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993; Mr H.K. Chapman, Chief Executive/Town Clerk, fish Hoek Municipality: Letter to Professor R.F. niggel responding to letter 7 September 1995: 14 September 1993).

There should be one free-standing body which has the support of the public.

(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1995).

Marketing of the CPPIYE is a problem in that people need to be made aware that the

CFPNE is a focal point of Cape Town.

(Member of the Public: South Peninsula Environmental Forum Public Meeting: 25 August 1993).

The controlling body should be accountable.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

The controlling body must have public representation.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

The controlling bodies should be non-political.

(Municipality in the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

There should be a full-time staff on the controlling body.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

There needs to be a co-ordinated board to plan, fund and co-ordinate the 'curators'.

(Representative of local authority in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

The board needs to be conservation-orientated.

(Representative of local authority in Cape Peninsula: CPPIYE Interviews: 26-28 April 1995).

Control should be vested with a single authority (eg World Heritage Site).

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

The CPMC should be regarded as a single unit. It should be managed and administrated as such.

(Mr A. Qubb, Wildlife Society of Southern Africa, Western Cape Branch: letter: 27 April 1993; Cape Town Chamber of Commerce: letter to Professor R.F. Niggel: 31 March 1993; Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1995).

There should be a single management body which would include public authorities, experts etc

(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993)

There should be a single controlling body with executive powers.

(Representatives of tourism organisation, local conservation organisation, government conservation department: CPPIYE Interviews: 26-28 April 1995; Mr E. Manus, representing S.A. Ornithology Society, Cape Bird Club and Friends of the Liesbeek: letter commenting on Document 1 of Circular 1: 21 June 1993; Mr R. Volley, Fairest Cape Association: telephone conversation: 29 April 1993; Professor C.L. Merry,

Department of Survey and Geodetic Engineering, UCT: letter to Professor R.F. Niggel in response to article in Argus on 9 August 1993; 18 August 1993• Mr A. Starke: letter to Professor R.F. Niggel: 4 August 1993).

There should be a group of advisors/specialists advising the main board which is an accountable executive body.

(Representative of recreation organisation: CPPNE Interviews: 26-28 April 1993).

The new body of control must have the respect of the public and managers.

(Representative of recreation organisation: CPPNE Interviews: 26-28 April 1993).

The new controlling body must have the authority to enforce its decisions.

(Representative of recreation organisation: CPPNE Interviews: 26-28 April 1993).

The controlling body must be accountable.

(Representatives of local conservation organisation and government conservation department: CPPNE Interviews: 26-28 April 1995).

The controlling body should be SOLEY RESPONSIBLE for the management of the mountain.

(Representatives of local conservation organisation: CPPNE Interviews: 26-28 April 1993).

The CPPNE should be managed as one comprehensive system, based on the determinant ecological and landscape features.

(Mr N.D. Geldenhuys, General Manager (Environmental Management) of National Parks Board: letter to Sue Lane: 18 June 1993; and Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

From a management point of view, there is need for a core of professional people to be involved.

(Representative of local authority in Cape Peninsula: CPPNE Interviews: 26-28 April 1995).

There is a need for leadership from both a political and planning/management perspective.

(Representative of local authority in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

The controlling body must be completely non-political.

(Representatives of local council in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

The controlling body must be professional, and not just academic.

(Representatives of local council in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

Consultants should be included with the authorities and interest groups in the planning bodies.

(The Chairperson, Silvermine River Society: commenting on Document 1 of Circular 1: no date; Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

There should be one committed local authority (metropolitan) because if powers are taken away from the local authority to central government, there will be immediate conflict and little scope for proactive management.

(Representative of government conservation department• CPPIYE Interviews: 26-28 April 1995).

The new body of control must employ their own staff.

(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

From an urban planning point of view, the management structure should be determined by planners.

(Representatives of local council in Cape Peninsula: CPFNE Interviews: 26-28 April 1993).

If there is more than one authority they must communicate and co-operate closely with each other.

(Representatives of local council in Cape Peninsula: CPPIYE Interviews: 26-28 April 1995).

The management should be seated in the Peninsula.

(Representatives of local council in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

The Chamber believes that all property in the hands of local and state authorities should be consoli in the hands of a single authority that should have the responsibility of managing the entire CPPNE area. Representative sub-committees, consisting of different authorities and interest groups should be established to make recommendations to the Management Committee relating to the management and control of specific areas.

(Cape Town Chamber of Commerce: letter to Professor R.F. Fu e: 31 March 1993).

Central government or quasi-government bodies should not become involved in the management of the area.

(Professor C.L. Merry, Department of Survey and Geodetic Engineering UCT: letter to Professor R.F. niggie in response to article in Argus on 9 August 1993: 18 August 1993).

It is proposed that a non-political trust would fulfill the role of guarantor of our special mountain heritage. A governing body could comprise honorable people with a demonstrated land ethic. Public membership would support and extend a land ethic amongst the nation. In Scotland a similar type of non-political trust, financed privately with State assistance, has acquired most of the responsibilities to conserve the natural and built environments.

(P. E. Blitgnaut: 'Proposal for a South African Land Ileritage Trust (SALIIT) for the Mountain: 1 June 1993).

There is a need to improve leadership, membership and legislation of Management Advisory Committee for it to be effective.

(Representative of local authority in Cape Peninsula: CPPIYE Interviews: 26-28 April 1995).

Monitoring should be an important part of the new management comrnitte's role.

¹ Indicates a cross-referral to another section

(Mr A. Qubb, Wildlife Society, Western Cape Branch: letter, 27 April 1993).

There should not be a so-called 'nature area controlled by one group with their exclusive decisions without a control built in. The people need to build in and write this control.

(Ms S. Louw: letter to Environmental Evaluation Unit: no date).

The management advisory committee of the CPPNE needs to be made representative.
(Senior City Council Staff main issues identified at meeting with Cape Town City Council: 12 March 1993).

Aspects of management and ownership of facilities could be privatised.
(Senior City Council Staff main issues identified at meeting with Cape Town City Council: 12 March 1993).

The mechanics of implementing policies need to be addressed.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

A core conservation area should be under one authority and should primarily function for conservation *(eg Cape Nature Conservation as a provincial organisation or preferably the National Parks Board).*
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

A technical arm could use the existing local authorities (Cape Town City Council, Regional Services Council) to undertake the day-to-day management of the CPPNE.
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993; Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

The present CPPNE structure could perhaps be used for the management of a low intensity development/buffer zone which incorporate private areas.
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

Management Advisory Committee persons must be appointed in a full-time capacity.
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

There needs to be management training of the controlling body,
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

The management staff need to be professional.
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

The controlling body should be one that can raise the funds*.
(Municipality in the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

The controlling body should be separate from the management body/ies which would be responsible for the implementation of the policy.
(Municipality in the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

The management body should act within whatever confines the controlling body determines and within a uniform set of conditions.

• Indicates a cross-referral to another section

(Municipality in the Cape Peninsula: CPPNE Interviews: 26 - 28 April 1993).

Both the public and the experts should be represented on the controlling bodies.
(Municipality in the Cape Peninsula: CPPNE Interviews: 26 - 28 April 1993).

There needs to be a protocol for changing policy in the future.
(Managers of the Cape Peninsula: CPPNE Interviews: 26 - 28 April 1993).

There needs to be a protocol for "grandiose schemes" (certain proposals circumvent normal local authority channels).
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).
The Peninsula needs to be divided into management blocks.
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1995).

There needs to be a liaison between the press and the management body.
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

Once policy is ratified, it should be left to the managers without interference (from politicians in local authorities; or self interests from various departments).
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

The implementation of policy and decision-making processes concerning the drawing up of plans need to be established.
(CPPNE Managers Forum: Issues identified at meeting: 24 March 1993).

A key issue is to determine who will be responsible for implementing policies.
(CPPIYE Managers Forum: Issues identified at meeting: 24 March 1993).

All existing authorities need to commit themselves to implementing the UCT recommendations.
(Comments from the Managers Forum Meeting: 28 July 1995).

The controlling body should be elected from interested and affected parties, each with equal powers. No single or local authorities should have special powers.
(Mr E. Walrus, representing S.A. Ornithology Society, Cape Bird Club and Friends of the Liesbeek: letter commenting on Document 1 of Circular 1: 21 June 1993).

Either people could be appointed in the same way as the SABC board; or people could be elected.
(Representatives of local council in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

There should be public participations in and public representation on the formation of any management (policy) structures developed for the CPMC, *le* it should be recognised that the CPMC belongs to the nation and not the authorities, and that community needs outweigh individual needs.
(Mr A. Gubb, Wildlife Society of Southern Africa, Western Cape Branch: letter, 27 April 1995).

The Controlling board should be nominated by an elected Parliament (from the Western Cape Region).
(Mr R. Ifulley, Fairest Cape Association: telephone conversation: 29 April 1995).

* Indicates a cross-referral to another section

The appointment of the CPFNE Committee as the administering authority should be considered if the CPPNE is declared a national park. This would mean that there would not be a complete loss of local control and there would be less likelihood of in-fighting and log-jamming between local authorities.

(Peter M. Adams: letter to Sue Lane: 11 August 1993).

Issues that relate to public representation on the controlling body are:

- (a) Nominations and appointments;
- (b) Accountability related to functions and finance; and
- (c) The formation of a Cape Peninsula Mountain Trust.

(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

The CFPNE should be controlled by a single authority after the style of the Natal Parks Board.

(Mr T. Keane, Fish Ifoek Alien Vegetation Control Group: letter commenting on Circular 1: 18 May 1993; and Mr T. Keane, Chairperson of the Environmental Sub-committee of the Fish Noek Residents Association: letter commenting on Circular 2: 2 August 1993; and Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

Two problems that need to be addressed related to a National Parks Board style administrative system are the establishment of: (a) a Conservation Advisory Committee, and (b) Recreation Advisory Committee.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

The CPPNE should become a contractual National Park with delegation to regional authority plus local input.

(Mr IL C. Taylor: comments on Document 1 of Circular 1: no date).

The area should be brought under one statutory body with a government grant and the ability to raise their own funds (*eg* by selling, tracing, *etc*). Strong statutory protection is required for the area. The Royal Natal National Park should be used as an example. *

(Mr R. Holley, Fairest Cape Association: telephone conversation 29 Apr 1995).

The Cape Peninsula Protected Natural Area should be given formal conservation status and classified as a World Heritage Site.

(Mr Mr A. Gubb, Wildlife Society of Southern Africa, Western Cape Branch: letter: 27 April 1995).

The CPFNE fits the definition and fulfills the criteria for a national park and will qualify for a World Heritage Site.

(Mr N.D. Geldenhuys, General Manager (Environmental Management) of National Parks Board: letter to Sue Lane: 18 June 1993; Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995; Dr A. Hall Martin, Executive Director: Southern Parks, National Parks Board: letter to Professor R.F. Niggel in response to letter of 7 September 1993: 4 October 1993).

* Indicates a cross-referral to another section

If the area should be managed as a national park, some of the following basic assumptions could apply:

- (a) The National Parks Act makes provision for inclusion of State and private land in a national park. The national park can also purchase land for inclusion in the park.
- (b) Any action for planning, proclamation and management of the national park will be based on the principles of integrated environmental planning and management, which would allow for the involvement of all interested and affected parties from the early stages of the process. A system of advisory committees and management would also ensure that all levels of participation are ensured, particularly in planning and management.

(Mr IY.D. Geldenhuys, General Manager (Environmental Management) of National Parks Board: letter to Sue Lane: 18 June 1993; and Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

The controlling body should operate on similar lines to that of the False Bay Forum.
(Representative of local conservation organisation: CPPIYE Interviews: 26-28 April 1993)

All authorities must cede control to a responsible body.

(Representative of local authority in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

Local authorities could be contracted out but there should still be a single body in control.

(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

If the CPPNE was privatised there would be a problem with control.

(Representative of tourism organisation: CPPIYE Interviews: 26-28 April 1993).

Privatisation would favour those with money and would therefore be unequitable.

(Representative of tourism organisation: CPPNE Interviews: 26-28 April 1993).

8.2 LEGAL ISSUES

At present, there are loopholes in the law.

(Member of the Public: South Peninsula Environmental Forum Public Meeting: 25 August 1993).

Protected Natural Environments are a problem in concept as they are a 'holding action' prior to expropriation by the state.

(Representative of government conservation department: CPPNE Interviews: 26-28 April 1993).

Protected Natural Environments can be used for developmental* control and conventional management.

(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1993).

The Environmental Conservation Act is inadequate for control, as it is too advisory.

(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1993).

The effectiveness of CPPNE depends on who the central authority is, and who is doing the ground work.

(Representative of government conservation department: CPPNE Interviews: 26-28 April 1993).

A limitation of the CPPNE is that the authority has no executive powers.

(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1993).

A limitation of the CPPNE is that organisations are not geared to the CPPNE.

(Representative of government conservation department: CPPNE Interviews: 26-28 April 1993).

A limitation of the CPPNE is that organisations are not committed to it.

(Representative of government conservation department: CPPNE Interviews: 26-28 April 1993).

A limitation of the CPPNE is that it would still be under the control of the Administrator.

(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1993).

The present CPPNE is too complex for any one organisation to run.

(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1995).

Because the mountain chain should be seen in its metropolitan/local context, the National Parks Act would not be appropriate as this would preclude action outside the proclaimed boundary.

(Representative of government conservation department: CPPNE Interviews: 26-28 April 1995).

There is agreement that the legal basis for controlling activities within the Caaape Peninsula Protected Natural Environment is inadequate.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPNE Project by Chief Executive Officer: 8 September 1993).

The EXISTING legal situation should be mapped in addition to the other mapping exercise.

(Member of public at CPPIYE Public Meeting: 5 August 1993)

A code of conduct or 'charter' should be drafted for the CPPNE as part of this project.

(Member of public at CPPNE Public Meeting: Tuesday 3 August 1995).

The final conclusions should be incorporated in a Conservation Charter which in turn should be incorporated in Municipal Regulations and enforced by law.

(Mr T. Keane, Fish Hoek Alien Vegetation Control Group: letter commenting on Circular 1, 18 May 1993).

There needs to be new legislation that applies specifically to the CPPNE.

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

The final model of control that emerges is translated into an Act of Parliament.
(Mr T. Keane, Chairman of the Environmental Sub-committee of the fish Hoek Residents Association: letter commenting on Circular 2: 2 August 1993).

There could be a separate Act of Parliament for the CPPNE.
(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

The following issues related to legislation should be addressed:

- (a) Shortcomings of existing legislation;
 - (b) The feasibility of new legislation;
 - (c) Which current legislation takes precedent over others;
 - (d) Compatibility of proposed policies with legislation (existing or proposed);
 - (e) Uniform regulations and enforcement;
 - (f) Implementation and enforcement of new legislation;
 - (g) Overlapping legislation (eg Marine and Seashore Acts).
- (Mr F. Britton and Mr J. Jackleman: personal comments on Circular 1).

The new Board must be given statutory authority (eg National Trust in England).
(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

Any legislation brought into force should be as simple as possible - both for Joe Soap and for the Administrator.
(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1993).

There should be a single piece of legislation, such as an ordinance.
(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1993).

There is a need to address the long-term implications of Table Mountain as a National Monument and the problems of control therein.
(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

The powers to protect the environment must be entrenched in the constitution of a federal government and devolved to metropolitan level, so that the will of the community cannot be thwarted by officials far removed and insensitive to, and uncaring about the deeply felt needs and wishes of the public.
(Mr T. Keane, Fish Hoek Allen Vegetation Control Group: letter to Environmental Evaluation Unit: 2 August 1993).

Laws regarding flower picking, feeding of baboons, littering, poaching, building illegally, should be STRICTLY enforced.
(Mr P. Salter, Chairman Simon's Town flora Conservation Group: letter commenting on Circular 1: 26 May 1993).

Existing, inadequate and overlapping legislation about fire* control needs to be examined.
(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

* Indicates a cross-referral to another section

Mountain zonation above a realistic, agreed altitude (not necessarily 152m) should be legally entrenched. *

(Mr h'. C. Taylor: comments on Document 1, Circular 1: no date).

Control and education go together. Law enforcement should be last resort. Fines imposed should preferably be non-monetary, but should relate to increasing the person's environmental responsibility (*eg* alien vegetation* control).

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

19.0.3.5. (Metropolitan Open Space) is a strong policy which could be utilised (although is local and not national).

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

All existing instruments of control need to be considered. The Environmental Conservation Act provides a range of control mechanisms.

(Comments from meeting with the Western Cape Regional Services Council: March 12 1993).

The legal status of the CPPNE needs to be upgraded.

(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1995).

Alternate legal instruments for the CPPNE need to be examined.

(Comments from meeting with Cape Provincial Administration: 12 March 1993).

The CPPNE should fall under national legislation to ensure its legal status.

(Managers of the Cape Peninsula: CPPIYE Interviews: 26 28 April 1993).

A new Act for the CPPNE might be the best solution.

(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993; Municipality in the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1995).

The loopholes of any new Act need to be carefully considered.

(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

The entrenchment of legal mechanisms (whether they be uniform by-laws adopted by local authorities or proclamation by the appropriate government authorities) warrants serious attention.

(Mr ILK. Chapman, Chief Executive/Town Clerk, fish Hoek Municipality: Letter to Professor R.F. Fuggle responding to letter 7 September 1993: 14 September 1993).

Adequate law enforcement, with penalties for non-compliance with regulations warrants serious attention.

(Mr H.K. Chapman, Chief Executive/Town Clerk, fish Hoek Municipality: Letter to Professor R.F. Fuggle responding to letter 7 September 1993: 14 September 1993).

Adequate funding* for such law enforcement agency from a single accountable controlling body, warrants serious attention.

(Mr ILK. Chapman, Chief Executive/Town Clerk, fish Hoek Municipality: Letter to Professor R.F. Fuggle responding to letter 7 September 1993: 14 September 1993).

The legal obligations of landowners* adjacent to the CPPNE needs to be addressed (*eg* fire protection).

(*Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993*).

The CPPNE should acquire World Heritage Site status.

(*Mr P.B. Blignaut• letter to Sue Lane commenting on Circular 1: 2 April 1993*).

There could be something similar to Groot Constantia, with an Act of Parliament and a trust.

(*Representatives of local council in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993*

The options of Biosphere Reserve, World Heritage Site and National Park need to be examined.

(*Representative of national conservation organisation: CPPNE Interviews: 26-28 April 1993*).

The models for the CPPNE that should be examined are National Trusts in England and the World Heritage Site.

(*Representatives of local council in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993*)

The CPPNE needs to become a 'Nature Reserve' or National Park.

(*Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993*).

The example of the National Parks Board should be followed.

(*Municipality in the Cape Peninsula: CPPIYE Interviews: 26 28 April 1993*).

8.3 FINANCIAL ISSUES

The CPPNE should be recognised as the future economic wealth of the greater Cape Town Metropolitan Area, primarily due to its scenic beauty, both from the sea and land.

(*Mr A. Gubb, Wildlife Society, Western Cape Branch: letter, 27 April 1993*).

The area should be brought under one statutory body with a government grant and the ability to raise their own funds* (*eg* by selling, trading, *etc*). Strong statutory protection is required for the area. The Royal Natal National Park should be used as an example.

(*Mr K Ifulley, Fairest Cape Association: telephone conversation 29 April 1993*).

The economic value of Table Mountain does not feature strongly enough in the economic process described.

(*Member of public at CPPIYE Public Meeting, 3 August 1993*).

An economic assessment should be done early on in the study.

(*Member of the Public: South Peninsula Environmental Forum Public Meeting: 25 August 1993*).

Table Mountain is important in terms of: tourism,* GDP, and jobs for Capetonians.

(*Representative of civic organisation: CPPIYE Interviews: 26-28 April 1993*).

• Indicates a cross-referral to another section

At present there is no systems management or policy regarding funding*.
(Representative of local authority in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

A system of funding* (le who should pay) needs to be established for fire* control.
(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

The major question is where is the funding going to come from.
(Representative of civic organisation: CPPIYE Interviews: 26-28 April 1993).
Cash is not a problem (eg Management Advisory Committee had the funds to appoint consultants for this project), but this has to go hand in glove with an overhaul of the whole council system, and the uncoupling of indirect bureaucratic costs'.
(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1995).

There is insufficient money' to do what is needed (eg no money from authorities to the footpaths).
(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1995).

There is a PERCEIVED lack of funds.
(Representatives of national conservation organisation and local authority in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993:

Because authorities are involved in managing several areas, one of which is the CPPNE, it is thus difficult to 'book' finances* (eg are firebreaks 'conservation' or 'urban safety').
(Representative of civic organisation: CPPIYE Interviews: 26-28 April 1995).

A fundamental question is who will control the funding*.
(Representative of civic organisation: CPPIYE Interviews: 26-28 April 1995).

A fundamental question is how is the money' to be recycled.
(Representative of civic organisation: CPPNE Interviews: 26-28 April 1995).

A higher financial' (budget) priority should be given to the CPPNE.
(Mr A. Gubb, Wildlife Society, Western Cape Branch: letter, 27 April 1995).

Financing is a fundamental issue (eg Signal fill - 10% of the proposed fare will generate R1 million/year).
(Representative of tourism organisation: CPPNE Interviews: 26-28 April 1993).

Innovative financing needs to be developed.
(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1995).

There is a need to examine the present overheads and administrative costs.
(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1995).

Duplication and overheads is resulting in a huge waste of money.
(Representative of local authority in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

Only one-third of the total budget is being spent on 'overheads'.
(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1995).

CPPNE, as an 'asset' should be developed commercially.
(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

The funding must not be dependent on subsidies, but rather be self-sufficient.
(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1995)

Moneys generated in the CPPNE MUST be earmarked for conservation* (eg SAIW), unlike the current situation of the Cape Town City Council.
(Representative of tourism organisation: CPPIYE Interviews: 26-28 April 1993).

Money needs to be spent to save money.
(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

There should be public input into the priorities for funding.
(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

The administration of funds needs public accountability.
(Sill/ermine River Society: commenting on Document 1 of Circular 1: no date; and Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).
The controlling body should be one that can raise the funds and it should be separate from the management body/ies which would be responsible for the implementation of the policy.
(Municipality in the Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

A fundamental issue is how funding should be raised and how it is to be guaranteed.
(Comments from meeting with the Western Cape Regional Services Council: March 12 1993).

The administration of funds needs to be accountable.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993; and Comments from meeting with Cape Provincial Administration: 12 March 1995).

There needs to be a regular audit of the administration of the funds to manage the use of the CPPNE.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

There needs to be public involvement concerning the allocation of funds.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

A greater number of people on the mountain could ensure a greater source of revenue.
(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993).

* Indicates a cross-referral to another section

There is concern that funding available for policy does not end up where it should go.
(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993).

To reduce the overheads of maintenance of the CPPNE, local conservation* groups could be asked to get involved in upgrading areas *(eg Elsies Peak)*.
(Municipality in the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993)

There needs to be finances set aside for environmental education* in the CPPNE.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

Adequate funding for a law enforcement agency from a single accountable controlling body, warrants serious attention. *
(Mr H.N. Chapman, Chief Executive/Town Clerk, fish Hoek Municipality: Letter to Professor R.F. Tuggle responding to letter 7 September 1993: 14 September 1993).

At present there are no contingency funds for fire* control emergencies.
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

An accountable body to decide where money such as that donated via SANF is spent is needed.
(Comments from the Managers Forum Meeting: 28 July 1993).

Financial planning for the CPPNE is a priority.
(Comments from the Managers Forum Meeting: 28 July 1995).

It is suggested that 'oncosts' are not deducted from donated money (currently monies 'vanish' into administration costs).
(Comments from the Managers Forum Meeting: 28 July 1993).

The key is to centralise the sources of funds and evolve an equitable redistribution mechanism.
(Mr O. Boddington: personal comments on Document 1 of Circular 1: 10 June 1993).

The financial benefits to the community need to be documented.
(Representative of civic organisation: CPPIYE Interviews: 26-28 April 1993).

If the rich benefit from the mountain, it will not be accepted.
(Representative of civic organisation: CPPIYE Interviews: 26-28 April 1993).

Proportion of the money generated by Table Mountain must be funneled towards social upliftment.
(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1993).

The preservation of the area must be seen to benefit the users and those paying money to manage the area.
(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

* Indicates a cross-referral to another section

Private landowners should possibly be paid a nominal rent as they are unable to develop their land. All private mountain land should be acquired in the medium/long term.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

A logo should be registered for the mountain for utilisation on approved sponsorship projects.

(Cape Town Chamber of Commerce: letter to Professor R.F. Fir le, 31 March 1993).

There could be something similar to droote Constantia, with an Act of Parliament and a trust.

(Representative of local council in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993)

The trust may not make a profit but has to manage itself using its funds.

(Representative of local council in Cape Peninsula: CFPNE Interviews: 26-28 April 1993)

An independent trust fund should be established for Table Mountain.

(Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle, 31 March 1993; Representative of local authority in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

All funds collected on the mountain, *eg* from Silvermine, the Cableway Company, should be paid into an independent trust fund.

(Cape Town Chamber of Commerce: letter to Professor R.F. niggle, 31 March 1993).

Careful consideration needs to be given to funding priorities, the control of trust funds and the allocation of funds according to the established priorities.

(Mr P. Britton and Mr J. Jackleman: personal comments on Circular 1: no date).

There should be an independent Cape Peninsula Mountain Trust Fund.

(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1993).

There should be an independent trust fund that is administered by the Management Authority*.

(Cape Town Chamber of Commerce: letter to Professor H.P. P.rggle, 31 March 1993).

The state and local authorities should contribute funds that they have available for the mountain to a Trust (including funds provided to the South African Historical Monuments Commission).

(Cape Town Chamber of Commerce: letter to Professor R.P. Fir le, 31 March 1993).

Apart from funding the administration, all funds allocated from the Trust should be applied directly towards the payment for works on the mountain, and private contractors should be used as far as possible.

(Cape Town Chamber of Commerce: letter to Professor B.F. Fuggle, 31 March 1993).

All funds collected on the mountain (*eg* the Cableway Company, Silvermine, *etc*) should be paid into the Trust Fund.

(Cape Town Chamber of Commerce: letter to Professor R. P. niggle, 31 March 1993).

• Indicates a cross-referral to another section

The Trust should encourage donations and seek tax-exempt status for donations as contributions towards the maintenance of a declared National Monument.
(Cape Town Chamber of Commerce: letter to Professor I.F. Fuggle, 31 March 1993).

The private sector should be encouraged to sponsor specific projects and to make donations to the Trust.
(Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle, 31 March 1993).

The financial structures of the CPPNE are not secure and they lack accountability.
(Committee for Land Usage and Transport Planning, Western Cape Regional Services Council: Annexure B from report about CPPIYE Project by Chief Executive Officer: 8 September 1995).

Public perceptions of the monetary value of the CPPNE should be addressed.
(Mr P. Britton, Cape Town City Council: Official comments on Circular 1: 25 June 1993).

Areas which offer certain facilities* may need to be fenced and a rate charged for entry. There should be no charge for areas where there are not those facilities.
(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1993).

Funds could be raised by charging an entrance fee to the CPPNE.
(Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle, 31 March 1993).

Access* fees or permits would create more problems than it is worth. It is too difficult to police the whole mountain chain.
(Professor C.L. Merry, Department of Survey and Geodetic Engineering, UCT: letter to Professor R.F. Fuggle in response to article in Argus on 9 August 1993: 18 August 1993).

The main principle governing the use of the CPPNE should be user pays.
(CPPIYE Managers Forum: Issues identified at meeting: 24 March 1993).

Tourism* revenue should be used solely to fund the management of the mountain.
(Senior City Council Staff main issues identified at meeting with Cape Town City Council: 12 March 1993).

Entrance permits could act as a source of revenue.
(CPPIYE Managers Forum: Issues identified at meeting: 24 March 1993).

Main access* points could act as points of control and revenue collection (ie payment required).
(Mr P. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

It is important to consider that charging itself is expensive.
(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1993).

Finances must be sourced at metropolitan and national levels.
(Senior City Council Staff: main issues identified at meeting with Cape Town City Council: 12 March 1993).

Picnic sites could be used to earn money for the UTNE.
(Municipality in the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993)

There could be a sliding scale of rates as one moves further away from the mountain.
(Municipality in the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

A fee could be imposed on people using the facilities within the UTNE to raise funding (eg have a levy on maps sold for the area, or through a permit system).
(Municipality in the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993)

The flow of money (ie back to the mountain chain) from tourism* needs to be examined.
(Mr P. de Tolley, Deputy City Planner: comments on Circular 1: 7 May 1993).

Entrance permits could act as sources of revenue.
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

The earnings from the permits could be used to produce maps.
(Managers of the Cape Peninsula: CPPIYE Interviews: 26 - 28 April 1993).

Revenue earned from the mountain must flow back to conservation management.
(Comments from meeting with Cape Provincial Administration: 12 March 1993).

A regional levy system needs to be examined.
(Representative of government conservation department: CPPIYE Interviews: 26-28 April 1993).

Having a fixed percentage of rates/levies being directed to the controlling body (does happen elsewhere eg Bay Areas Rapid Transport) would be supported.
(Representative of tourism organisation: CPPIYE Interviews: 26-28 April 1993).

if one viewed the area as the entire Peninsula, then a transaction levy is applicable.
(Representatives of local council in Cape Peninsula: CPPIYE Interviews: 26-28 April 1993).

The concept of a transaction levy is sound but impoverished communities would object.
(Representatives of local conservation organisation: CPPIYE Interviews: 26-28 April 1993)

A bed levy might be an alternative to transaction levies but it would be difficult to differentiate between 'tourists' and others.
(Representative of local conservation organisation: CPPIYE Interviews: 26-28 April 1993)

For any levy people must be aware of the benefits, else they will not be happy giving money.
(Representative of recreation organisation: CPPIYE Interviews: 26-28 April 1993).

A levy should be acquired from each cableway ride to pay towards management
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

In principle there is no objection to paying a levy per person for the use of the mountain.

(Representatives of tourism organisation: CPPIYE Interviews: 26-28 April 1993).

Tourists` could pay conservation levies (hotel accommodation, on arrival, etc).
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Businesses that benefit from the use of the mountain should pay a levy.
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Levies for CPPNE funding should be divided at a national, regional and local levels.
(Municipality in the Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

Funding should be based on the principle of user pays.
(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: Letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993; Representatives of local and national conservation groups, local council in Cape Peninsula: CPPNE Interviews: 26-28 April 1993).

A user pays system should be implemented to generate funds for social upliftment etc
(Representatives of local conservation organisation: CFPIYE Interviews: 26-28 April 1995)

Users and businesses that benefit from tourism* should pay towards the management of the mountain chain.
(Mr P. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Tourists should contribute financially to the mountain chain management. *
(Mr P. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

All users of the mountain should pay (unless voluntary services are rendered).
(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

There should be many sources of funds.
(Mr G. Boddington; personal comments on Document I of Circular 1: 10 June 1993).

Funds could be raised by making function facilities* on the mountain available for hire by the private sector.
(Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle, 31 March 1995).

Funds could be raised by leasing sites for the development of resorts, restaurants, etc
(Cape Town Chamber of Commerce: letter to Professor R.F. Fuggle, 31 March 1993).

Sources of finance could be harvesting taxes on water*, recreation* and passing ships*.
(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

Funds could be raised by charging rentals for exclusive use.
(Mr EA. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

* Indicates a cross-referral to another section

Donations (egSANF) could be source of funding.

(Representative of local conservation organisation: CPPIYE Interviews: 26-28 April 1993).

Funds could be raise through tax deductible donations (regional or metropolitan).

(Mr F.A. Fehrsen, Development Promotion, Small Development Corporation Ltd: letter to Rachel Wynberg commenting on Document 1 of Circular 1: 29 April 1993).

A range of permits, such as day permits for sensitive areas and annual permits for general hiking and picnicking, could provide a source of revenue for the CPPNE management.

(Silvermine River Society: comments on Document 1 of Circular 1: no date).

There could be sliding tariff system with tourists* paying a lot.

(Representative of national conservation organisation: CPPIYE Interviews: 26-28 April 1995).

Funds could be raised from interest accruing from the proposed SANF Fund.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Funding could come from the development of overnight chalets* on a 2-3 day trail, targeted at the international market.

(Representative of local conservation organisation: CPFDIE Interviews: 26-28 April 1993)

Funds could be raised from overseas funding for a World Heritage Site.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

Funds could be raised from interpretative* centres

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1995).

Funds could be raised from memorabilia.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993; Silvermine River Society: comments on Document 1 of Circular 1: no date).

Metal models of the mountain could be sold to tourists for upkeep of the mountain.

(Member of the Public: South Peninsula Environmental Forum Public Meeting: 25 August 1993).

Funds from the cableway* should be used to manage the CPPNE.

(Ms S. Louw: letter to Environmental Evaluation Unit: no date; and Professor C.L. Merry, Department of Survey and Geodetic Engineering, UCT: letter to Professor R.F. Fuggle in response to article in Argus on 9 August 1995: 18 August 1993; and Diana F. Wilson: letter to Rachel Wynberg in response to press release on 13 May 1993 and Circular 1: 23 June 1993).

It would not be physically or economically possible to fence the mountain. Therefore, it is suggest that users buy a permit which provides them with access to the mountain at specific entry points. These funds could be used to maintain mountain paths, restore fire* or erosion* damaged areas and enable replanting and conservation education to be undertaken.

(Mr A. Starke: letter to Professor R.F. Fuggle: 4 August 1993).

There is a need to develop 'honeypots' to attract tourists* to generate income and preserve the visual integrity of the area.

(Representative of local authority in Cape Peninsula: CITIYE Interviews: 26-28 April).

It has been suggested that the mountain be sub-divided into lots and pieces 'sold' to provide funds for its upkeep.

(Member of the Public: South Peninsula Environmental Forum Public Meeting: 25 August 1993).

Consideration should be given to having a differential, more expensive rate for foreign tourists.

(Mr P.E. Blignaut: letter to Sue Lane commenting on Circular 1: 2 April 1993).

There is a concern that the fenders of this study (*le* the authorities) are the same people who may be implementing the policy, and that there could be vested interests.

(Member of public at CPPIYE Public Meeting: 3 August 1995)

* Indicates a cross-referral to another section

PART B:

COMMENTS RECEIVED FROM PUBLIC OWNERS WITH THE SOUTH PELOPOLE

I. VISION

1.1 INITIAL VISION (Circular #1, 22 April 1993)

The Red Hill Landowners Conservation Group is in accord with the draft 'overriding vision' for the future management of the Cape Peninsula Mountain Chain.
(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

2. PROJECT PROCEDURE

The Straw Man forming the initial framework for the UCT study could lack the kind of familiarity and understanding of grass-roots problems and threats facing the natural environment that only hands-on experience can bestow. This would occur if only the RSC Town Planning Department, and not conservation and environmental groups intimately involved in the restoration and protection of the area, is consulted.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1995).

The existing policy guidelines have ensured the protection of the mountain in many respects and much good work has been done, so it would be better to state 'that the existing policies guiding management of the mountain chain need to be improved'.

(Ms A. Croudace, Red Hill Landowners Conservation Group: minutes from meeting forwarded to Ms S. Lane: 19 October 1993).

3. PHYSICAL FEATURES AND WATER

3.1 ROCK AND SOILS

Kaolin mining should be strictly prohibited.

(Glencairn Civic Association, Kommetlie Ratepayers Association, Noordhoek and District Civic Association, Scarborough Ratepayers Association, South Peninsula Environmental Forum, Fish Hoek Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Kaolin mining should be allowed at the present site provided that the site is rehabilitated.

(Fish Hoek Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Residential and mining activities are incompatible, therefore kaolin mining should be prohibited where it is close to present or planned residential areas and other areas visible from scenic routes.

(Peak-to-Point Nature Foundation: Appendix C of South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues: August 1993. Engineering Services Regional Planning).

All mining and/or earthmoving should be prohibited.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June

3.2 WATER

Schuster River is being impacted by the Red Hill squatter community.*

(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993).

Wetlands should be protected.

(Noordhoek and District Civic Association, South Peninsula Environmental Forum: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues: August 1993. Engineering Services Regional Planning.)

Wetlands should be included in nature reserves.

(Kommetjie Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning.)

There should be no development within wetland areas.

(Fish Hoek Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning.)

Wetlands could be used to encourage tourism*.

(IYoordhoek and District Civic Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues: August 1993. Engineering Services Regional Planning).

Low income housing* could have a major impact on wetlands.

(Kommetjie Ratepayers Association, Peak-to-Point Nature Foundation: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues: August 1993.

The wetland near the Cape Point Nature Reserve should be included in the Reserve.

(Scarborough Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Wetlands are being destroyed.

(South Peninsula Environmental Forum: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues'. November 1993. Engineering Services Regional Planning).

Development* in important catchment areas should be prohibited.

• Indicates a cross-referral to another section

(fish Hoek Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

3.3 FIRE

Reducing the UTNE would allow for better management of invasive vegetation* improved fire* prevention and generally make it more manageable and more accessible.

(Simon's Town Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

3.4 POLLUTION

Effluent from polluted inland catchment areas* is causing pollution in False Bay.

(Kalk Bay Beautifying Society, Kalk Bay Residents Association, Kalk Bay Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

High density development* and a golf course in Botha's Camp area would introduce many pollutants to this catchment area *(eg weedkiller, septic tanks, run-off over paved areas, etc).*

(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993).

4. BIOLOGICAL DIVERSITY

4.1 GENERAL

More attention needs to be paid to the way that natural systems work and the time-frames that they require.

(Red Hill Landowners Conservation Group: Comments on Circular #1: dated 28 June 1983).

Policies should fit in with the natural cycles as they are encountered *(eg untimely fires should be vigorously combated in order to protect the environment itself and not merely the structures and dwellings as is presently the case. This would eventually allow a regime of controlled burning to effectively promote diversity in the area).*

(Red Hill Landowners Conservation Group: Comments on Circular #1: dated 28 June 1983).

Restoration of the natural environment* should be encouraged by giving incentives like tax-deductions for those who manage their land satisfactorily.

(Red Hill Landowners Conservation Group: Comments on Circular #1: dated 28 June 1983).

* Indicates a cross-referral to another section

The preconception that only the top of the mountain range species can or should be preserved should be abandoned.

(Red Hill Landowners Conservation Group: Comments on Circular #1: dated 28 June 1983).

Tourist accommodation (eg in the form of single, decentralized cabins) should only be permitted where land has been restored and maintained.

(Red Hill Landowners Conservation Group: Comments on Circular #1: dated 28 June 1985).

Provisions and incentives for the maintenance and restoration of land needs to be enshrined in legislation.*

(Red Hill Landowners Conservation Group: Comments on Circular #1: dated. 28 June 1983).

An overall conservation policy is missing for the CPPNE area.

(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993).

4.2 FLORA AND ALIEN VEGETATION

- **Alien Vegetation**

What is seriously lacking is a resource base offering support for the eradication of alien invasive vegetation. * This applies especially to private residents and landowners* who have made valiant efforts out of their own resources to maintain the integrity of the particular areas.

(Red Hill Landowners Conservation Group: Comments on Circular #1: dated 28 June 1993).

A commitment to eradicate of alien vegetation is missing from the South Peninsula Sub-regional Plan.

(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993).

Alien vegetation should be removed within the Southern Peninsula, starting in the most vulnerable areas (eggullies with indigenous vegetation).

(Comments from Four South Peninsula WCRSC Projects: field Trip: 10 May 1993).

Reducing the CPPNE would allow for better management of invasive vegetation, improved fire* prevention and generally make it more manageable and more accessible.

(Simon's Town Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Reducing the CPPNE would allow for better management of invasive vegetation* improved fire* prevention and generally make it more manageable and more accessible.

(Simon's Town Municipality: Appendix C of 'South Peninsula Sub-regional Plan:

. Indicates a cross-referral to another section

Towards Identifying Problems and Issues. August 1995 Engineering Services Regional Planning).

- **Indigenous Vegetation**

The southern CITTIE has a very high conservation potential and conservation of all land here, irrespective of altitude or ownership", should be a priority. In any case the species patterns (flora and faunal) on low-lying land are different from those found on high-lying ground.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June

There is a case for creating a Kirstenbosch type botanical garden devoted entirely to local indigenous species at Botha's Camp.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993; Red Hill Landowners Conservation Group: Dual Management Models for the CPPIYE: A Suggestion: Letter: undated).

There should be no development* behind the Soetwater spine road immediately below Slangkop as it represents an important Strandveld community.

(Four South Peninsula WCRSC Projects: Meld Trip held on 10 May 1993).

- **Agriculture**

Agricultural activities should be given more assistance.

(Kalk Bay Fishing Community and Residents' Association, Kalk Bay Ratepayers' Association, Kalk Bay Beautifying Society: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues. November 1993. Engineering Services Regional Planning).

4.3 FAUNA

The southern UTNE has a very high conservation potential and conservation of all land here, irrespective of altitude or ownership*, should be a priority. In any case the species patterns (flora* and fauna) on low-lying land are different from those found on high-lying ground.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June

Slangkop should become a nature reserve because in this area there exists the opportunity to create a corridor from the mountain and the seas. This corridor is important as Slangkop is unique in the peninsula as it accommodates two sleeping communities of baboons.

(Four South Peninsula WCRSC Projects: Meld Trip held on 10 May 1993)

4.4 THE MARINE AND COASTAL ENVIRONMENT

The C11⁷11,5 should be increased and should include certain off-shore areas.

(Fish Hoek Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

* Indicates a cross-referral to another section

5. CULTURAL AND SCENIC

5.1 AESTHETICS

Industrial development* in the South Peninsula would diminish its scenic value.
(Kommetjie Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Developmental* nodes should be situated where they are not visible from scenic routes, so as not to destroy the visual resources.

(Scarborough Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Ribbon development* should be prohibited, especially along scenic routes.
(Peak-to-Point Nature Foundation, Simon's Town Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

More attention needs to be paid to aesthetics where housing developments' occur on scenic routes (eg Ocean View).

(South Peninsula Environmental Forum, Kommetjie Environmental Action Group, Peak-to-Point Nature Foundation: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues'. August 1995. Engineering Services Regional Planning).

Dumping along the scenic routes should be prohibited.

(Ifommetjie Ratepayers Association, Llandudno Residents Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues'. August 1993. Engineering Services Regional Planning).

5.2 RECREATION AND TOURISM

Tourist accommodation (eg in the form of single, decentralised cabins) should only be permitted where land has been restored and maintained.'

(Red Hill Landowners Conservation Group: Comments on Circular # 1: dated 28 June 1983).

The CPPIIE should be better utilised for tourism and recreation.

(Simon's Town Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning)

Vehicular access for recreational* purposes to undeveloped land should be prohibited.

(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June

A wilderness trail in the Peninsula should be investigated.

(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1995).

A system of trails* over Slangkop should be investigated.

* Indicates a cross-referral to another section

(Four South Peninsula WCRSC Projects: field 7'rip held on 10 May 1995).

No account is taken of the enormous potential export industry which the whole area holds for tourism and eco-tourism. there is one issue where both conservation-minded 'idealists' and commercial-minded 'realists' can and should act in unison.
(Red Hill Landowners Conservation Group: Input for public meeting on RSC Structure Plans for the South Peninsula: Simon's Town Hall: 6 July 1993).

Unique tourist attractions within natural areas are being destroyed.
(flout Bay Ratepayers Association Development Sub-committee, Imizamo Yethu Civic Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

The natural environment should be taken care of as it has important benefits for tourism in the South Peninsula.
(Kalk Bay Beautifying Society, Kalk Bay Residents Association, Kalk Bay Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues'. August 1993. Engineering Services Regional Planning).

The CPPNE should be better utilised for tourism and recreation.
(Simon's Town Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues'. August 1993. Engineering Services Regional Planning).

The nature reserves should be made more accessible to promote tourism.
(Simon's Town Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Wetlands* could be used to encourage tourism.
(JYoordhoek and District Civic Association: Appendix C of South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Single isolated cabins in natural environments would better suit eco-tourists than cluster and hotel accommodation.
(Red dill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993).

Tourist facilities on Long Beach should be upgraded, to improve the tourism potential of the area as a whole.
(Kommetjle Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

5.3 EDUCATION

An information centre could be established at Botha's Camp.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993; Red Hill Landowners Conservation Group: Dual Management Models for the CPPIYE: A Suggestion: Letter: undated).

6. DEVELOPMENT

6.1 Development

The RSC have approached this local structure plan with a rather rigidly held 'quid pro quo' development philosophy, namely the development of privately-owned 'development nodes'. We believed that this approach will open the way for development pressure to become a reality in the only section of the Peninsula where they have not been a major threat.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

The Red Hill Landowners Organisation cannot see the need for more "eco-tourist" cluster accommodation in the area. It is already served by holiday villages close by and bed-and-breakfast accommodation. What the area needs is the kind of accommodation that can offer the genuine eco-tourist something close to the wilderness experience; - which cannot be catered for anywhere else in the Peninsula.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

Bulldozing should only be permitted after a permit from the relevant nature conservation department has been obtained. this should be strictly enforced.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

Building limits should be observed along the lines suggested by the Red Hill Landowners Conservation Group 'Minute'.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

The question of development in the southern part of the CPPNE should be considered as a whole. To do so in a piecemeal fashion in which several separate structure plans (including the one for Red Hill and 'Red Hill South') are set up for an integral PNE area is misdirected, and could lead to impulsive and inconsistent recommendations.

(Red Hill Landowners Conservation Group: Input for public meeting on RSC Structure Plans for the South Peninsula Coastal Drives: Simon's Town Hall: 6 July 1993).

No development recommendations should be made that have the effect of watering down present guidelines.

(Red Hill Landowners Conservation Group: Input for public meeting on RSC Structure Plans for the South Peninsula Coastal Drives : Simon's Town Hall: 6 July 1993).

The trade-off or 'quid pro quo' option combines the worst of both worlds: desecration by development plus degradation by neglect. It is by far the worst of the options so far mooted.

(Red Hill Landowners Conservation Group: Input for public meeting on RSC Structure Plans for the South Peninsula Coastal Drives: Simon's Town Hall: 6 July 1993).

It is recommended that no new recommendations regarding further development nodes be made, or else a moratorium on the making of such recommendations be imposed on the grounds that these structure plans are subordinate to the UCT EEU CPPNE study,

the sub-regional plan for the south Peninsula and the Metropolitan Guide Plan; and the cognate with the local structure plan for Red Hill and °South Red Hill'.

(Red Hill Landowners Conservation Group: Input for public meeting on RSC Structure Plans for the South Peninsula Coastal Drives: Simon's Town Hall: 6 July 1993).

The RSC are fragmenting the planning process instead of dealing with the southern CPPNE as a whole. The consultant should make no recommendations (especially on development) in isolation from those flowing from other planning initiatives currently underway.

(Red Hill Landowners Conservation Group: Input for public meeting on RSC Structure Plans for the South Peninsula Coastal Drives: Simon's Town Hall: 6 July 1993).

Development in important catchment areas* should be prohibited.

(Fish Hoek Municipality: Appendix C of South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues'. August 1993. Engineering Services Regional Planning.)

Much of the publicly owned land in the southern section of the CPPNE (with the exception of the COOHNR) is in a state of extreme neglect, manifesting extreme alien infestation.

(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June 1983).

The fact that not only publicly owned land but also privately owned land needs to be restored and conserved should be accepted and given concrete support.

(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June 1983).

The southern CPPNE has a very high conservation potential and conservation of all land here, irrespective of altitude or ownership*, should be a priority.

(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June 1983).

High density development and a golf course in Botha's Camp area would introduce many pollutants to this catchment area (eg weedkiller, septic tanks, run-off over paved areas, etc).

(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993).

Cluster developments in the CPPNE would provide housing for only a few people at the cost of damaging the natural environment and atmosphere of the South Peninsula.

(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993).

* indicates a cross-referral to another section

Urban sprawl should be prevented.

(Fish Hoek Municipality and flout Bay Ratepayers Association Development Subcommittee, flout Bay Heights Residents Association, flout Bay Action Committee, Imizamo Yethu Civic Association, Icommeljie Ratepayers Association, Llandudno Residents Association, Scarborough Ratepayers Association, South Peninsula Environmental Forum, Llandudno Residents Association, Scarborough Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1995. Engineering Services Regional Planning).

Development within the CPPNE should be avoided wherever possible.

(Kommetjie Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1995. Engineering Services Regional Planning).

The natural environment should be adequately protected.

(Ifornrnetjle Ratepayers Association, Simon's Town Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues'. August 1993. Engineering Services Regional Planning).

The destruction of the natural environment needs to stop.

(Scarborough Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

The CPPNE needs to be protected by stricter development control measures.

(South Peninsula Environmental Forum: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Large scale development within the CPPNE should be prohibited.

(Scarborough Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Facilities for recreation, education and eco-tourism should only be permitted on a small scale.

(Scarborough Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

It is believed that Regional Services Council's development nodes concepts would result in development nodes along the roads. This would detract from the rural and natural environmental quality of the Southern Peninsula and could end up in ribbon development.

(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993).

There is increasing pressure for development within the CPPNE.

(Peak-to-Point Nature Foundation: Appendix C of South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

More land is needed for housing.

(flout Bay Heights Residents Association, flout Bay Action Committee, Imizamo Yethu Civic Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards

Identifying Problems and Issues'. August 1993. Engineering Services Regional Planning).

More state land should be made available for affordable housing.

(Glencairn Civic Association: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues'. November 1995. Engineering Services Regional Planning).

The mountain slopes should be protected and used only for environmentally sensitive development.

(Ocean View Management Committee: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues'. August 1993. Engineering Services Regional Planning).

There is too much development on the mountain slopes, where plots are large and visible. This development should be restricted.

(Glencairn Civic Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Development on highly visible slopes should be restricted.

(Kalk Bay fishing Community and Residents' Association, Kalk Bay Ratepayers' Association, Kalk Bay Beautifying Society: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues. November 1993. Engineering Services Regional Planning).

There is a threat to the ecology of steep mountain slopes (eg the new site-and service extensions to Ocean View were situated on land with a 1:4 gradient).

(Komrnetsie Environmental Action Group: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Housing developments should not be permitted above the 131m contour and should be strictly limited.

(Noordhoek and District Civic Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues: August 1993. Engineering Services Regional Planning).

• **Industrial Development**

Industrial sites are not desirable in the South Peninsula and new sites should not be established.

(Red fill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993; and Peak-to-Point Nature Foundation: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Industrial development in the South Peninsula should be prohibited as it is contrary to the rural nature of this area.

(flout Bay Heights Residents Association, flout Bay Action Committee, Imizarno Yethu Civic Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards

Identifying Problems and Issues'. August 1993. Engineering Services Regional Planning).

Polluting industries should not be allowed in the South Peninsula.

¹ Indicates a cross-referral to another section

(Kafir Bay Beautifying Society, Kalk Bay Residents Association, Kalk Bay Ratepayers Association, Simon's Town Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues'. August 1993. Engineering Services Regional Planning).

Industrial development in the South Peninsula would diminish its scenic value.
(Kommetjile Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues'. August 1993. Engineering Services Regional Planning).

6.2 ACCESS

Botha's Camp is well placed to act as a controlled access point to the mountain for the public.

(Red Ifni Landowners Conservation Group: comments on Circular #1: dated 28 June 1993; Red Hill Landowners Conservation Group: Dual Management Models for the CPPIYE: A Suggestion: Letter: undated).

The level ground at Botha's Camp makes it accessible to the old and infirm as well as to school groups.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

Vehicular access for recreational* purposes to undeveloped land should be prohibited.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

Official access, where needed, should be strictly controlled.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

Public access areas should be formalised where possible, so that the public does not enter protected areas randomly.

(Four South Peninsula WCRSC Projects: Meld Trip held on 10 May 1993).

Reducing the CPPNE* would allow for better management of invasive vegetation* improved fire* prevention and generally make it more manageable and more accessible.

(Simon's Town Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues'. August 1993. Engineering Services Regional Planning).

The CPPNE is not as accessible as it was in the past.

(Simon's Town Municipality: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues. November 1993. Engineering Services Regional Planning).

An entrance gateway should be provided in the South Peninsula to put across the message that one is entering a protected environmental area.

(Four South Peninsula WCRSC Projects: Meld Trip held on 10 May 1993).

Botha's Camp would make an excellent gateway to Red Hill Plateau.

(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993).

Gateways should be seen in the context of the overall CPFNE area.
(Four South Peninsula WCRSC Projects: field Trip held on 10 May 1993).

The nature reserves should be made more accessible to promote tourism.
(Simon's Town Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

- **Paths**

In certain areas (eg Slangkop) existing paths should not be interfered with even if they pass through sensitive areas, as they are desire lines and people would merely continue to use them. Rather a sense of responsibility should rather be engendered in the users.

(Four South Peninsula WCRSC Projects: Field Trip held on 10 May 1995).

A system of trails* over Slangkop should be investigated.
(Four South Peninsula WCRSC Projects: Field Trip held on 10 May 1993).

- **Transport**

Public transport within the South Peninsula is unsafe.
(Site 5 Community Committee, Simon's Town Ratepayers' Association, Simon's Town Municipality, Kalk Bay fishing Community and Residents' Association, Kalk Bay Ratepayers' Association: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues. November 1993. Engineering Services Regional Planning).

Public transport within the South Peninsula is irregular.
(Site 5 Community Committee, Simon's Town Municipality, Fish Hoek Municipality, Kalk Bay Fishing Community and Residents' Association, Kalk Bay Ratepayers' Association: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues. November 1993. Engineering Services Regional Planning).

Public transport within the South Peninsula is inadequate.
(Site 5 Community Committee, fish Hoek Municipality. • Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues. November 1995. Engineering Services Regional Planning).

Public transport within the South Peninsula is inefficient.
(Simon's Town Ratepayers' Association, Kalk Bay Fishing Community and Residents' Association, Kalk Bay Ratepayers' Association, Nth Ifoek Ratepayers' Association: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues. November 1993. Engineering Services Regional Planning).

There is a lack of cheap public transport in the South Peninsula.
(Fish Hoek Ratepayers' Association: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues'. November 1995. Engineering Services Regional Planning).

• Indicates a cross-referral to another section

There is a lack of co-ordination between bus and rail services.
(Simon's Town Municipality: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues'. November 1993. Engineering Services Regional Planning).

The use of private transport should be discouraged.
(Peak-to-Point Nature Foundation: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues'. November 1993. Engineering Services Regional Planning).

Public transport should be improved.
(Peak-to-Point Nature Foundation, Llandudno Residents' Association: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues'. November 1993. Engineering Services Regional Planning).

Rail transport should be improved.
(Fish Hoek Municipality: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues'. November 1993. Engineering Services Regional Planning).

A railway line should be built to Ocean View.
(Kalk Bay fishing Community and Residents' Association, Kalk Bay Ratepayers' Association: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues'. November 1993. Engineering Services Regional Planning).

Main road is under pressure as it is becoming the main link with Fish Hoek and Simon's Town.
(Kalk Bay fishing Community and Residents' Association, Kalk Bay Ratepayers' Association, Kalk Bay Beautifying Society: Appendix E of 'South Peninsula Sub-regional Plan: Problems and Issues'. November 1995. Engineering Services Regional Planning).

6.3 FACILITIES

The establishment of facilities for pleasure and small fishing boats at Schuster Bay should not occur. Simon's Town harbour should be expanded if the need for further facilities becomes evident.
(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards 'dent/64/1g problems and issues: August 1993).

The development of facilities in specified areas (eg Miller's Point) should be designed to cater for mass usage over peak periods.
(Four South Peninsula WCRSC Projects: Field Trip held on 10 May 1993).

The development of facilities within the southern Peninsula should be done in an environmentally sensitive manner, that is using a low key, unobtrusive style.
(Four South Peninsula WCRSC Projects: field Trip held on 10 May 1993).

Location of new ablution blocks should be environmentally determined and informed by a prior archaeological* investigation, where necessary.
(Four South Peninsula WCRSC Projects: field Trip held on 10 May 1993).

• Indicates a cross-referral to another section

Tourist* facilities on Long Beach should be upgraded, to improve the tourism potential of the area as a whole.

(Ifo.mmetjie Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Ablution facilities should be designed for maximum usage.

(Four South Peninsula WCRSC Projects: field Trip held on 10 May 1993).

Facilities for recreation*, education* and eco-tourism* should only be permitted on a small scale.

(Scarborough Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Witsands should not be upgraded out of the reach of the poorer community for whom it provides a launching facility.

(Red [Jul Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993).

The provision and upgrading of parking areas should be carefully examined using the following criteria:

- 'Safety

- 'Need (related to peak periods and the carrying capacity of the area)

- 'Preservation of the atmosphere/enjoyment of the visitor

- Presence of fauna, especially baboons

- 'Costs

(Four South Peninsula WCRSC Projects: field Trip held on 10 May 1993).

Parking areas should remain informal (gravel) but be upgraded.

(Four South Peninsula WCRSC Projects: Field Trip held on 10 May 1993).

The quantity of sewage processed by Kommetjie should not be increased until an environmental impact assessment has confirmed that the ecology of Wildevoevlei will not be affected.

(Ifo.mmetjie Environmental Action Group: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

6.4 BOUNDARY CHANGES

The CPPNE boundaries need to be re-considered as they are not drawn according to any discernible rationale.

(Red Hill Landowners Conservation Group: comments on Circular 11: dated 28 June 1993).

Boundaries should follow contours and other natural features in a sensitive and creative manner. This will greatly facilitate management.*

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

It is strongly recommended that Botha's Camp and adjacent land on the north Red Hill

* Indicates a cross-referral to another section

Plateau should be included in the CPPNE.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

The redrawing of the South PNE along more rational lines*, focusing on the unwarranted excision from the CPPNE by the Simon's Town Council of Municipal land near the Botha's Camp in Red Hill. We can see no reason why land use policy in the Botha's Camp could not be accommodated within a biosphere reserve or similar concept.

(Red Hill Landowners Conservation Group: Dual Management Models for the CI: YE: A Suggestion: Letter: undated).

The CPPNE should not be reduced in size.

(Irommetjle Ratepayers Association: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues'. August 1993. Engineering Services Regional Planning).

The CPPNE area should include the corridors that would link it to the sea'.

(Four South Peninsula WCRSC Projects: Meld Trip: 10 May 1993).

Slangkop should become a nature reserve because in this area there exists the opportunity to create a corridor from the mountain and the sea. This corridor is important as Slangkop is unique in the peninsula as it accommodates two sleeping communities of baboons.

(Four South Peninsula WCRSC Projects: Meld Trip held on 10 May 1993)

The CPPNE should be increased in size and should include certain off-shore* areas.

0:5 Hoek Municipality: Appendix C of South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues'. August 1993. Engineering Services Regional Planning).*

The wetland* near the Cape Point Nature Reserve should be included in the Reserve.

(Scarborough Ratepayers Association: Appendix C of South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

Reducing the CPPNE would allow for better management of invasive vegetation* improved fire* prevention and generally make it more manageable and more accessible.

(Simon's Town Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues'. August 1993. Engineering Services Regional Planning).

Changing of the boundaries of the CPPNE should be undertaken with caution as there is already more than available finances can cope with in alien clearing and control.

(Ms A. Croudace, Red Hill Landowners Conservation Group: minutes from meeting forwarded to Ms S. Lane: 19 October 1993).

6.5 LAND OWNERSHIP

- **Informal Housing**

The Red Hill informal settlement should, at the request of the community itself, be sited according to the places of employment of its members.

(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June

Both the squatter community and the Red Hill Landowners Conservation Group favour Perdekloof for those who work for the RSC, and Dido Valley or Welcome Farm for those who work in Simon's Town or Da Gama Park.

(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June

Schuster River is being impacted by the Red Hill squatter community.*

(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993).

Small concentrations of people in low income residential areas are preferable to large concentrations of people in one or more low income residential areas.

(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993; and Peak-to-Point Nature foundation: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues: August 1995. Engineering Services Regional Planning),

The proper siting of informal settlements needs to be addressed otherwise they will erode or destroy natural areas.

(Fish Hoek Municipality: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

A new site for the Red Hill Squatter Community should be found as soon as possible.

(Red Hill Squatter Committee: Appendix C of 'South Peninsula Sub-regional Plan: Towards Identifying Problems and Issues. August 1993. Engineering Services Regional Planning).

It is suggested that the Red Hill Squatter community should be relocated to the eastern picnic area or the area should be upgraded.

(Comments from Four South Peninsula WCRSC Projects: Meld Ttip: 10 May 1995).

The existing siting of the Red Hill Informal Settlement does not comply with the selection of the site based on the least environmental impact and in the provision of the most cost efficient services. Perdekloof does.

(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993).

- **Private Land Ownership**

Very little account seems to be taken of the fact that landowners who bought into the CITNE have done so with the full knowledge and awareness of the constraints attendant on living in a legally proclaimed protected natural environment.

• Indicates a cross-referral to another section

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

Those UTNE landowners who do not accept UTNE restrictions should not receive the kid-gloves treatment that so far has been witnessed. It is better to inconvenience a development-minded landowner who has made an injudicious investment than to place the status of the CPPNE in jeopardy.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1995).

What is seriously lacking is a resource base offering support for the eradication of alien invasive vegetation.* This applies especially to private residents and landowners* who have made valiant efforts out of their own resources to maintain the integrity of the particular areas.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

An approachable and knowledgeable liaison officer between private and relevant authority/ies is essential.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

State purchase of private land cannot work: there is no money either for the transactions themselves or for the subsequent conservation management. Private landowners in the area have a better conservation track record than the RSC with respect to non-reserve management.

(Red Hill Landowners Conservation Group: Input for public meeting on RSC Structure Plans for the South Peninsula: Simon's Town Hall: 6 July 1993).

The privilege of land ownership in the UTNE, carries with it the responsibility to exercise stewardship for the sake of all well-intentioned people who should not be prevented from enjoying access to the natural environment and wilderness areas.

(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993).

There should be more housing developments by private developers in the sector where there is a shortage, *ie* sub-economic.

(Red Hill Landowners Conservation Group: points raised regarding the South Peninsula Sub-regional Plan: Draft towards identifying problems and issues: August 1993).

7. FUNCTIONAL AREAS

The rural zoning subdivisions down to a minimum of 21,5 hectares should be maintained, while at the same time providing incentives for those owning multiples of 21,5 hectares not to subdivide at all, or to subdivide down to larger holdings.

(Red Hill Landowners Conservation Group: Comments on Circular #1: dated 28 June 1983).

* Indicates a cross-referral to another section

8. ADMINISTRATION

8.1 GENERAL

The most serious defect in the present management practices concerning the CPPNE is the lack of effective policing to maintain restrictions that are in place.
(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June 1993).

The Red Hill Landowners Conservation Group believe that the authorities charged with upholding the policies and ideals do not lack teeth, they lack the conviction and tenacity to use them incisively.
(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June 1993).

The Red Hill Landowners Conservation Group have little confidence in the RSC being designated as the local authority to have jurisdiction over the CPPNE.
(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June 1993).

Boundaries should follow contours and other natural features in a sensitive and creative manner. This will greatly facilitate management.*
(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June 1993).

Management of the CPPNE should be vested in an authority that is involved solely with conservation, something like the Parks Board.
(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June 1993).

The management body should consist of properly trained biologists, ecologists and conservationists, and not people who have achieved eminence in other fields.
(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June 1993).

The management body should have powers and resources to police CPPNE policies and provisions.
(Red Hill Landowners Conservation Group: Comments on Circular # 1: dated 28 June 1983).

A dedicated approach with a single, clear line of accountability is essential for protecting the UTNE situated as it is within a major metropolitan area and subject to a multitude of ongoing pressures and hazards.
(Red Hill Landowners Conservation Group: Comments on Circular # 1: dated 28 June 1983).

The objective of authorities who have jurisdiction over the UTNE should be to manage it in such a way that it is restored to its rightful place as a world ecological exemplar.
(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June 1993).

Although large tracts of land have been neglected in the Red Hill area, it is feasible to restore them and preserve the area. It is believed that many of the problems are

Indicates a cross-referral to another section

due to the lack of an incisive overall management plan. The Red Hill Landowners Conservation Group would like to see a comprehensive study being done to identify the most effective conservation model for this area and a management plan developed to match.

(Ms Alicia Croudace, Red Hill Landowners Conservation Group: Letter: to Sue Lane: Brief Guided Tour of the Southern Peninsula: Dated 18 August 1993).

There is a strong case for not treating the CPPNE as a unitary system requiring the development of a unitary administration.

(Red Hill Landowners Conservation Group: Dual Management Models for the CPPNL• A Suggestion: Letter: undated).

The northern part of the CPPNE is not only separated from the southern part by large intervening area of miscellaneous land-use (Fish Hoek-Sunnydale-Noordhoek-lout Bay) but, of greater importance, that these two PIE segments are themselves differentiable in terms of terrain, landuse and context. Therefore the study team should look at different management models for the two ME sub-regions.

(Red Hill Landowners Conservation Group: Dual Management Models for the CPPIYE: A Suggestion: Letter: undated).

Within the South PIE, the model Red Hill Landowners Conservation Group would like to see is a conservation-cum-development model that lays its emphasis on **how pr.s2ples,aniiveinitamionywillinabire** This concept is namely a Biosphere Reserve.

(Red Hill Landowners Conservation Group: Dual Management Models for the CPPIYE:• A Suggestion: Letter: undated).

The redrawing of the South PIE along more rational lines*, focusing on the unwarranted excision from the CPPNE by the Simon's Town Council of Municipal land near the Botha's Camp in Red Hill. We can see no reason why land use policy in the Botha's Camp could not be accommodated within a biosphere reserve or similar concept.

(Red Hill Landowners Conservation Group: Dual Management Models for the CPPNE: A Suggestion: Letter: undated).

It is suggested that the Cape Nature Conservation be reinstated as the body responsible for overseeing the restoration of the natural environment of the Cape Peninsula.

(Mr. Arnold Ambrovitz, Red Hill Landowners Conservation Group: Letter to all 1YGOs concerned with restoring and conserving the CPPNE: 'The CPPIYE and the role of the Cape Nature Conservation': dated 31 December 1993).

8.2 LEGAL ISSUES

Provisions and incentives for the maintenance and restoration of land need to be enshrined in legislation.*

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1983).

• indicates a cross-referral to another section

8.3 FINANCIAL ISSUES

Restoration of the natural environment* should be encouraged by giving incentives like tax-deductions for those who manage their land satisfactorily.

(Red Hill Landowners Conservation Group: Comments on Circular #1: dated 28 June 1983).

There will be financial constraints in whatever plan is embarked upon and therefore there will need to be a realistic view of many other demands made upon local and government authorities.

(Ms A. Croudace, Red Hill Landowners Conservation Group: Minutes from meeting forwarded to Ms S. Lane: 19 October 1993).

What is seriously lacking is a resource base offering support for the eradication of alien invasive vegetation.* This applies especially to private residents and landowners* who have made valiant efforts out of their own resources to maintain the integrity of the particular areas.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

9. COMMENTS ON OTHER PLANS

9.1 LOCAL STRUCTURE PLANS

If prevailing CPPNE guidelines are judged to lack muscle or teeth, then the recommendations from the present local structure plans should serve to strengthen them.

(Red Hill Landowners Conservation Group: Input for public meeting on RSC Structure Plans for the South Peninsula Coastal Drives: Simon's Town Hall: 6 July 1993).

Co-ordination of all current structure plans and guide plans should not only be carried out as a matter of urgent priority, but they should be seen to be carried out.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

All structure plans involving the PNE should have adhere to Integrated Environmental Management procedure or their equivalent.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

There are grave concerns about the status and direction of the RSC's local structure plans for Red Hill and 'South Red Hill'.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

The local structure plans seemingly are proceeding autonomously and unilaterally of UCT's CPPNE Policy Project, and are in danger of pre-empting the findings of it.

(Red Hill Landowners Conservation Group: comments on Circular #1: dated 28 June 1993).

The Integrated Environmental Management procedures are not being followed in Red Hill Local Structure Plan (le no public document was made available at the start of the

project; no initial public meeting was called; essentially interested and affected

* Indicates a cross-referral to another section

parties were not invited to submit their input; no formal scoping procedure was embarked upon; reasonable alternatives to the RSC's 'quid pro quo' development-node proposal have not been seriously and systematically identified and considered; no regular, official written material has been distributed).

(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June 1993).

There seems to be very little evidence that issues thrown up by cognate planning initiatives have been taken into account in the Local Structure Plan.

(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June 1993).

10. GENERAL

There is no readily accessible and understandable document explaining and upholding the CPPNE ideals, objectives and policies. This document needs publicity in a variety of ways.

(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June 1993).

There needs to be a concerted, imaginative publicity campaign to remedy the lack of knowledge about the CPPNE ideals, objectives and policies.

(Red Hill Landowners Conservation Group: comments on Circular # 1: dated 28 June 1993).

11. OTHER DOCUMENTS SUBMITTED BY THE RED HILL LANDOWNERS CONSERVATION GROUP

11.1 ATTACHED TO CIRCULAR #1

- 'Cowling Document' which serves as a charter for the Red Hill Landowners Conservation Group (undated)
- Red Hill Landowners Conservation Group Constitution (undated)
- Operational Guidelines and Principles which serve as a preliminary input to the RSC's proposed local structure plan for the 'Red Hill and Red Hill South'. (09/04/1993).
- Red Hill Landowners Conservation Group Development Philosophy for Private Land within the CPPNE. (undated)
- Red Hill Landowners Conservation Group 'Minute' outlining initial draft counter-proposals for above local structure plan. (08/04/1993)
- Discussion Document, Planning Principles and Guidelines: Red Hill Region of CPPNE. August 1991.

11.2 SEPERATE SUBMISSIONS

- Western Cape Regional Services Council, 1993. *Conservation Options for Red Ilia South Peninsula: Discussion Paper*. May 1993.
- Southern CPPNE Coalition Memorandum (26/07/1993).
- Observations on RSC Reactions to Red Hill Landowners Conservation Group Claims

relating to the Red Hill Planning Process and Related Conservation Issues. (Received 15/10/1993).

- Red Hill Landowners Conservation Group on the UCT Red Hill Informal

Settlement Study. (October 1992)

- Sections, pertinent to LICT CPPNE Project, from the Simon's Town Council's Agenda for their meeting of 19/10/1993.
- Cape Nature Conservation's New Strategic Conservation Initiatives', arranged and edited by the Red Hill Landowners Conservation Group, so as to focus systematically on principles, themes and topics especially relevant to the Peninsula. (31 December 1993).

7. PUBLIC PARTICIPATION AND ENVIRONMENTAL POLICY FOR THE CITY OF CAPE TOWN OF THE CAPE PROVINCE: REPORT ON MEETINGS HELD ON THE CAPE FLATS

**(prepared by Farieda Khan of the Environmental Advisory Unit,
University of Cape Town June 1994. EAU Report No. 03/94/05)**

TABLE OF CONTENTS

1. INTRODUCTION
2. BRIEF
3. INFORMATION GIVEN TO THE PUBLIC
 - 3.1 Background
 - 3.2 Findings of the Draft Report
4. THE CAPE FLATS PUBLIC MEETINGS
 - 4.1 Public Participation among Disadvantaged Communities
 - 4.2 The Organisation of the Public Meetings
5. REPORT ON THE PUBLIC MEETINGS
 - 5.1 Public Meeting - Athlone
 - 5.2 Public Meeting - Mitchells Plain
 - 5.3 Public Meeting - Langa
 - 5.4 Public Meeting - Khayelitsha
 - 5.5 Public Meeting - Langa
 - 5.6 Public Meeting - Langa
6. CONCLUSION AND RECOMMENDATIONS
7. REFERENCES
8. APPENDICES

REPORTS ON INDIVIDUAL MEETINGS:

Mkhuzuli Auwa
Jongile Gqodwana
Yana Jeftha
Farieda Khan

ACKNOWLEDGEMENTS:

The EAU wishes to thank Sue Lane and Rachel Wynberg for their assistance and support. Jongile Gqodwana and Leila Mahomed are also thanked for their hard work and enthusiasm in arranging the public meetings.

**PUBLIC PARTICIPATION ASPECTS OF THE DRAFT POLICY FOR THE
MULTIPURPOSE USE OF THE CAPE PENINSULA:
REPORT ON MEETINGS HELD ON THE CAPE FLATS**

1. INTRODUCTION

The University of Cape Town (UCT) was appointed by the Administrator of the Cape in February 1993 to prepare a document to "provide policy and management options for the future planning, development and management of the mountain chain, constituent nature reserves, forests, monuments and other land included in the Cape Peninsula Protected Natural Environment" (see Draft Policy, vol. 2, Appendix 5). At the request of the Administrator, this brief was subsequently broadened to investigate the method of implementation in more detail. A policy document "is, required to ensure that present or new structures of authority will be in a position to manage the use of the Cape Peninsula in a way that will contribute to prosperity, be acceptable and beneficial to most people, and retain maximal options for the future" (Draft Policy, vol. 1).

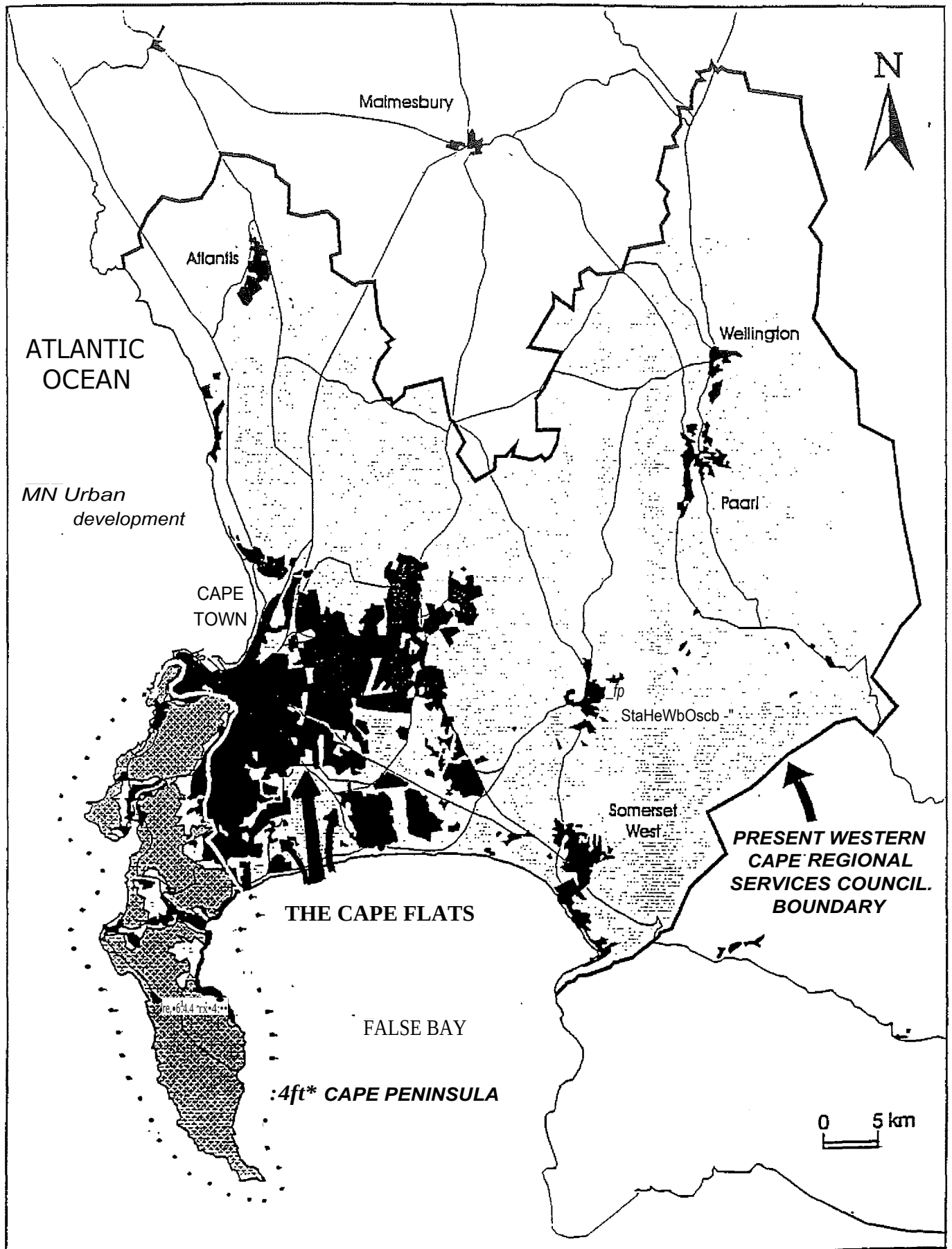
During the investigation, it was realised that a plan for the Cape Peninsula Protected Natural Environment, or CPPNE (Appendix- 1), would be ineffective unless it was expanded to include the adjoining areas as well. Thus the investigation was expanded to include the whole of the Cape Peninsula (see Appendix 2).

The investigation was carried out by UCT, and administered and co-ordinated by the Environmental Evaluation Unit (EEU). The Environmental Advisory Unit (EAU) and several other units and departments at the University of Cape Town assisted in the process of developing a policy for the multipurpose use of the Cape Peninsula. The specific role of the EAU, was to facilitate broad-based public participation, especially among black communities on the Cape Flats. Public participation¹ was an integral element of the investigation through public meetings and circulars sent to a variety of interested and affected parties, as well as workshops for different Interest groups (see Appendix 3).

The Draft Report was completed by 18 April 1994, and copies were sent to key interested and affected parties, as well as to all public libraries in the Greater Cape Town metropolitan area, including the Cape Peninsula and Cape Flats. This was followed by a month long series of public meetings, held in May, in order to facilitate the feedback process. Comments and proposals made by the public would guide the drafting of the final report during June 1994.

¹ The main categories of organisations Involved in the public participation process were: NGOs and Users; Individuals; Ratepayers Associations and Local Councils; Political, Community and Labour Organisations; Business, Farming and Industry; Local and Regional Authorities; Central Government Departments and Parastatals; Committees, Subcommittees and Commissions; Consultants; Media. For a comprehensive list of organisations, see the Draft Report, vol 2, Appendix 11.

The Cape Peninsula in the spatial context of the Cape Metropolitan Area.



2. BRIEF

Through circulars and the media, it was made known that copies of the Draft Report were available, and the public was invited to comment. In addition, a series of public meetings was held, in order to facilitate discussion of the Draft Report, and to receive direct feedback from the public. The Environmental Advisory Unit was asked to:

- (i) compile a wide-ranging list of interest groups based on the Cape Flats,
- (ii) organise a series of reportback meetings on the Cape Flats, and
- (iii) compile a report on the meetings which would reflect the main concerns and opinions of the participants.

3. INFORMATION GIVEN TO THE PUBLIC²

The following summary, which is a simplified version of the Draft Report, formed the basis of the reportback meetings on the Cape Flats (see Section 4.3).

3.1 ' Background

3.1.1 Problems

Several problems gave rise to this study. These include such factors as:

- No general policy for managing the protection and use of different parts of the Cape Peninsula exists.
- Too many authorities are in control of specific functions or areas. Fourteen different government organisations have jurisdiction over this area.

There is a lack of finance.

- A Management Advisory Committee (MAC) was established for the CPPNE, but because it acts only in an advisory capacity, it is ineffective.

² This section is based on the Draft Report, vol 1.

There is a shortage of administrative staff, making it difficult to properly manage the use of the CPPNE.

3.1.2 Purpose

The purpose of this investigation, is to develop an effective policy for managing the protection and use of the entire. Cape Peninsula.

3.1.3 Perspective

The following approach guided the investigation:

' A healthy, prosperous and scenically attractive Cape Peninsula will be a main feature attracting people to the Cape Metropolitan Area, both as residents and tourists. Thus, human use of the area should be managed so that there are as many benefits to society as possible, while the losses to the environment are kept as low as possible.'

3.1.4 Process

A flexible, appropriate and responsive approach was adopted, with the emphasis on public consultation and participation throughout. For example, there was ongoing consultation with key interested and affected parties, in order to identify important concerns.

Several meetings and workshops were also held, including legal, visual, biophysical and cultural/historical workshops. In addition, newspapers, radio and TV services were kept informed. Comments received from the public were included in Appendix 13 of the Draft Report.

3.1.5 Principles

The principles upon which the proposed policy has been based, are:

Firstly, the principle of sustainability. It has to be accepted that the development of the Cape Peninsula, is dependent on the wise use of its natural, cultural and scenic assets. It is crucial therefore, that these assets not be destroyed, or diminished, ie. that they are used sustainably.

Secondly, the principle of equity, i.e. that all residents and visitors should have convenient and fair access to the Peninsula's facilities and resources.

Thirdly, the principle of efficiency, i.e. that all resources must be used efficiently, in order to ensure effective management of the use of the Peninsula.

Fourthly, the principle of participation, i.e. that public involvement must be a key element of this investigation.

Fifthly, the principle of accountability. AU decision-making must be understandable, clear, transparent and accountable to the public.

Sixthly, the principle of adaptability, i.e. that a management structure acceptable to all, and responsive to future social, economic and environmental changes, should be created.

3.2 Findings of the Draft Report

3.2,1 Main Findings

The main findings of the report are that:

The entire Cape Peninsula requires special protection.

The biggest threats to the protection and management of the use of the Peninsula include:

- **increasing population (destroys the natural homes of plants and animals, i.e their habitat)**
- **uncontrolled urban expansion (destroys natural and scenic areas, cultural and historical heritage)**
- **alien plants and animals (alien plants make it very difficult for indigenous plants to grow, while alien animals compete for food and living space and degrade the land. Also, woody alien plants burn more fiercely, resulting in many animal deaths, and contributing to severe erosion and flooding)**
- **too many wild fires (this makes it difficult for indigenous plants to grow again, contributing to erosion and flooding)**

- there are too many authorities (14) controlling the area.
- the existing information base for the Cape Peninsula is inadequate
 - thus a proper management plan cannot be drawn up.

3.2.2 Main Recommendations

The following major recommendations were made:

After public comments on this document have been received and included in the final report, and it has been accepted by the Premier of the W Cape, it should be adopted by the proper authorities.

An interim structure should be established in order to ensure that the recommendations made are implemented.

The Cape Peninsula should be managed so that there are as many benefits to society as possible, while losses to the environment should be kept as low as possible.

- There should be a campaign to increase public awareness of the Cape Peninsula as an asset.

3.2.3 Specific Findings

3.2.3.1 Biotic Diversity

This term is used to describe the variety of living things which exist.

The Cape Peninsula has a rich variety of animals and plants, but there are many threats to this variety.

This rich variety of plants and animals should be protected.

RECOMMENDATION: It is therefore recommended that any changes to land, water and air be managed in order to maintain and enhance the area's rich biodiversity. The report contains further details, such as recommendations on reducing fire risks, the prevention of habitat destruction etc.

3.2.3.2. Cultural and Scenic Diversity

The beauty and variety of the Cape's scenery is well known.

There is also a rich cultural history which includes evidence of the hunting and gathering activities of people who lived in this area long before the arrival of van Riebeeck.

Our history also includes buildings dating from the colonial period, as well as modern political symbols such as the mosques and churches of District 6.

Our cultural and scenic assets face many threats, eg inappropriate urban development.

RECOMMENDATION: It is therefore recommended that the area should be managed so as to increase the benefits to society, while keeping our cultural and scenic losses to a minimum.

3.2.3.3 Boundaries

The present boundaries of the CPPNE include only a part of the Cape Peninsula.

It is therefore difficult to manage the protection and use of the Cape Peninsula.

RECOMMENDATION: It is therefore recommended that the CPPNE be expanded to include the surrounding seas and developed areas. This should become known as the Cape Peninsula Heritage Area.

3.2.3.4. Functional Areas

The Cape Peninsula has areas which can tolerate heavy use.

These areas should therefore be developed for intensive use.

There are also areas which cannot be heavily disturbed.

These areas should be managed as 'wild' nature protection areas.

It is also noted that, at present, there is no overall plan which could allow the entire area to be divided up into different levels of use.

RECOMMENDATION: It is therefore recommended that human use of the Cape Peninsula should take place according to the permitted use for each area (see Appendix 4).

3.2.3.5 Four Categories of Use

In terms of the above, four categories of use have been suggested:

(1) Remote Areas

- * **are 'wild' areas**
- * **are situated at a distance from urban areas**
- * **need a high level of protection**
- * **will have a low level of human use**

(2) Quiet Areas

- * **have high scenic and environmental value**
- * **already have facilities**
- * **are generally within sight of urban areas**
- * **and can cope with a higher level of use**

(3) Leisure Areas

- * **have a lower scenic and environmental value**
- * **can withstand a fairly high level of use**
- * **and are already, or soon will be, developed recreation areas**

(4) Transitional Areas

- * are existing urban or farming areas
- * or are about to be developed as urban or farming areas.

3.2.3.6 TWO ADDITIONAL CATEGORIES OF USE HAVE BEEN RECOMMENDED WITHIN FUNCTIONAL AREAS.

(5) Sites of Special Interest

- * have been identified on the basis of scientific, cultural, educational, or scenic value

(6) Utility Sites

- * are sites which have facilities or developments such as quarries, radio masts, sewage outlets and refuse dumps, on them
- * should be managed so as to lower the element of danger to the public and the environment

3.2.3.7 AUTHORITY FUNCTIONS

The existing Management Advisory Committee does not have control over the proposed Cape Peninsula Heritage Area.

The 14 public authorities also do not have effective control over the area. Moreover, these authorities have other primary interests, such as urban development.

RECOMMENDATION: It is therefore recommended that a single authority, called the **Cape Peninsula Heritage Area Authority**, should be created, to manage and protect the use of the area.

4. THE CAPE FLATS PUBLIC MEETINGS

4.1 Public Participation among Disadvantaged Communities

The management team was guided by the procedures recommended by Integrated Environmental Management³ (IEM), throughout this project. The basic principles which underpin IEM are:

- a broad understanding of the term 'environment'
- informed decision-making
- accountability for decisions and for the information on which they are based
- an open, participatory approach in the planning of proposals
- pro-active and positive planning

In terms of the above, it is evident that public participation forms an essential and integral element of the IEM process. Every effort was therefore made to ensure that the public, and in particular, those sections of the public formerly excluded from decision-making processes, was consulted from the initial stages of the investigation. The Australian experience (see Ross, undated) has clearly shown that the participation of marginalised communities (such as the Aboriginal people) is crucial to the planning process. Such participation,

- ensures that thorough and valid assessments are made
- promotes awareness of the situations and concerns of such communities
- enhances a community's understanding of potential changes
- helps people to consider the issues and options for themselves
- enables people to take action to safeguard their interests

³ IEM is a procedure developed in South Africa, which is 'designed to ensure that the environmental consequences of developments are understood and adequately considered in the development process. It is intended to guide, rather than impede, the development process by providing a positive, interactive approach to gathering and analyzing useful data and presenting findings in a form that can be easily understood by non-specialists' (Preston, Robins and Fuggle, 1992, p. 749).

In South Africa, however, the history of institutionalised racial discrimination and inequality, presents a formidable obstacle to the successful implementation of public participation procedures. Thus, among black communities, factors such as poverty, poor education, high illiteracy levels and widespread unemployment, have to be taken into account when devising such procedures. Moreover, the legacy of authoritarian government and the lack of a democratic tradition, has led to few opportunities for widespread public participation. These difficulties have been acknowledged in recent studies (Sowman, 1993; Sowman and Gawith, pending), as well as in earlier guideline documents on IEM, in which strategies specifically aimed at ensuring the participation of disadvantaged communities, were proposed (Department of Environment Affairs, 1992). These include:

- identifying and involving key players within the community
- working with community leaders and representative groups
- appointing a locally based organisation or credible service organisation to conduct meetings, workshops or interviews
- using simple, well illustrated fact sheets

However, studies conducted among marginalised groups in Australia and New Zealand, have shown that additional effort is required in order to ensure representative participation (Nottingham, 1990; Ross 1990a and 1990b). All too frequently, holding formal meetings at inconvenient times and in inconvenient venues, erects barriers to widespread participation. Ideally, informal, small group meetings and individual interviews conducted at convenient times and venues within the community, is the best method of ensuring such participation.

Another factor of significance, according to Nottingham (1990) and Ross (1990b), is the historical factor. The past is often a crucial factor in understanding the way in which a community might react to a proposed development. This is certainly the case in South Africa, where the apartheid legacy has left a huge socio-economic backlog which continues to impact on the daily lives of the poor. Thus, sensitivity to the legacy of apartheid, as well as its continuing impact, is a pre-requisite for the successful implementation of public participation procedures among disadvantaged communities.

Finally, the issue of language within the multi-lingual context of South Africa is especially important. As far as possible, all public documents and discussions should be available in, or be conducted in, the major languages spoken by the different groups within a given community. In addition, effective communication is also dependent on the use of clear and simple language. Hence, documents intended for popular use should be free of academic or technical jargon.

4.2 The Organisation of the Public Meetings

The arrangements for the public meetings were made bearing in mind the issues and problems discussed in Section 4.1. However, given the specific constraints⁴ of this particular public participation process, it was not always possible to implement the various strategies put forward in the previous section.

In consultation with the EEU management team, it was agreed that, given the time constraint of one month, four public meetings⁵ would be held on the Cape Flats in order to report back on the draft policy. These meetings would be an integral part of the public meetings which would simultaneously take place in various parts of the Cape Peninsula. The Cape Flats areas agreed upon were: Athlone, Lange, Mitchells Plain and Khayelitsha. The meetings would be held at suitable venues in these areas. It was decided to hold the meetings on a Saturday afternoon, since past experience had shown that people living in the townships were often reluctant to attend meetings held on week nights for a variety of reasons, including lack of safety and the fact that people were tired after a day's work.

Invitations to the meetings were sent to a wide range of organisations and institutions on the Cape Flats, about five weeks in advance of the meeting. The letters, which explained the purpose of the meeting were sent out in English, Afrikaans and Xhosa. The organisations targeted included: environmental and development organisations; civic associations; the local branches of political organisations across the spectrum; schools and colleges; and community-based organisations such as religious and youth organisations. Posters advertising the meetings were also sent to community organisations and schools, with a request to display these in a prominent place. Press releases, with relevant information on the meetings, were faxed to the following community newspapers which are distributed on the Cape Flats:

- The Southeaster
- The People's Express
- The Athlone News
- The Plainsman

⁴ There were specific time and space constraints. The public reportback meetings were scheduled to take place largely over one month, while the target area, the Cape Flats, is a huge area, containing densely populated, sprawling settlements.

⁵ Studies have shown that public participation procedures among disadvantaged communities are lengthy and time-consuming, particularly when the more effective technique of informal house meetings is utilised (Sowman, 1993; Sowman and Gawith, pending). Ideally therefore, a longer period should have been allowed for the public reportback meetings.

- The Southern Mail
- The Northern Echo
- City Vision

However, these press releases were only published in the *Southeaster*, the *Plainsman* and *City Vision*. In addition, Radio Xhosa announced details of the Khayelitsha meeting. Telephonic reminders were made to as many organisations as possible, during the week in which the meeting was held. Jongile Gqodwana, who organised the meetings in Langa and Khayelitsha, also visited many schools in Langa, Guguletu and Khayelitsha in order to personally deliver the invitations, and to put up the posters.

Due to the poor attendance at the meeting in Langa (see Section 5.3), a local school as well as the library in Langa, offered to host two additional meetings. These were duly held on 1 June.

4.3 The Format of the Meetings

Popular pamphlets which summarised the key issues in the Draft Report in simple English, Afrikaans and Xhosa, were distributed before the meeting began (see Appendix 5 for the English version). The Chairperson, either Farieda Khan or Jongile Gqodwana, then opened the meetings by introducing her/himself, and explained (i) the role of the Environmental Advisory Unit (EAU), and (ii) the purpose of the meeting. The meetings were conducted within the following 'vision' contained in the pamphlet, which **had** been developed by the management team,

"The Cape Peninsula belongs to everyone who lives and works here, and is also important for the people who visit it. Everyone should be able to enjoy the area. Everyone must benefit from any development that takes place in the future. It must not be for a few people only."

With the aid of transparencies; slides featuring the flora, fauna, scenery and cityscapes of the Cape Peninsula; as well as the popular pamphlets, the main aspects of the Draft Report were explained (see Section 3).

The meetings were conducted in English or Xhosa, with members of the audience responding in their home language (which included Afrikaans). A discussion period then followed, during which members of the audience articulated their opinions and concerns. Discussion took place around the following questions:

Do you think that the Cape Peninsula is a special area that needs better protection?

Do you think that different areas of the Cape Peninsula should be used in different ways?

Do you think that a single authority should be in charge of the Cape Peninsula?

Do you think that the 'Cape Peninsula Heritage Area' is good name, or would you like to suggest another name?

Do you have any comments on the report?

Forms which allowed for more detailed, written comment on the Draft Report, were distributed at the close of the meetings.

5. REPORT ON THE PUBLIC MEETINGS

5.1 Public Meeting, Athlone - Farieda Khan and Yana Jeftha

Date: **14 May 1994**

Venue: Alexander Sinton Senior Secondary, Crawford, Athlone

5.1.1 Attendance Record

N. Rossouw, the Environment Society (ENSOC), University of the Western Cape (UWC)

R. Brown, ENSOC, UWC

M. Presserd, ENSOC, UWC

W. Daniels, Democratic Party (DP)

E. Jakoet, UBUNTU

A. Adams, UBUNTU

R. Wagiet, Hewat College

M.F. Wagiet, Belgravia High

A. Mohammed, UBUNTU

A. George, UBUNTU

F. Fredericks, Environmental Education Resources Unit (EERU), UWC

M.S. Dawood, Private individual

L. Abass, Private individual

H. Davids, African National Congress (ANC), Heideveld branch

A. Sharpe, ANC (Heideveld branch)
 L. Samodien, ANC (Heideveld branch)
 L. Mohammed, Private individual
 R. Campher, UBUNTU
 K. Desai, Private individual
 R. Omar, Private individual
 Y. Wilson, Private individual
 C. Reddy, Oaklands Senior Secondary
 B.J. Lesch, Private individual
 E.R. Buis, Private individual
 S. Parker, Development Agency for Tourism Action (DATA)
 L. Hendrikse, Private individual
 H.A. Banderker, Pan Africanist Congress (PAC)

5.1.2 Discussion

5.1.2.1 Boundaries: Incorporation of the Cape Flats into the Draft Policy

Question: (Heideveld ANC)

It was understood that the meeting would address the environmental problems of the Cape Flats as well - areas like Khayelitsha. Why was the Cape Flats not incorporated into the study?

Answer: The EAU agrees that the authorities should look at the Cape Flats and the Cape Peninsula as a whole.

Comment: F. Wagiet (Belgravia High)

I feel that the Draft Policy has not taken a holistic view, as the Cape Flats was not included. Urban development has to be done in conjunction with environmental planning. There is a need therefore to develop a holistic plan for the whole of Cape Town.

Comment: S. Dawood (Private citizen)

In order to motivate people's interests across the board, the issue of the Cape Flats has to be addressed. People's basic needs have to be taken into account.

Comment: Heideveld ANC

Environmental issues have to be addressed on the Cape Flats, as well as stressing environmental education. We have to start thinking about the Cape Flats, about beautifying the area. It's only the affluent people who are concerned about the issues raised in the report. We cannot afford to take our families to Cape Point - it's too expensive.

Comment: Teacher, Atlantis

The Cape Peninsula should not be viewed as a separate entity. Planning for the Cape Flats should be part of planning for the Cape Peninsula.

The speaker also stressed the need for environmental education.

Comment: W. Daniels (DP)

Hanover Park has a long history. We were here long ago, before Mitchell's Plain was built, but no-one has taken any notice of us. When is something going to be done about Hanover Park? I agree that nature is important, but how do we get people to appreciate it when there are no trees or flowers for them to enjoy? Trees should be planted in the area.

5.1.2.2 Policy and Principles

Question: Teacher (Atlantis)

The policy is noble but development cannot be independent of the changes that have occurred. How responsive has the investigation been to these changes, where is the major emphasis of the proposal and how are they going to deal with the policy?

Answer: Attempts are being made to strike a balance between the needs of people and that of the environment and we therefore promote sustainable development. We've tried to be responsive to socio-economic and political issues which is why we've attempted to involve political parties across the spectrum.

Comment: F. Wagiet (Belgravia High)

There is a need for grassroots participation in environmental issues. Also, we need to move away from a Eurocentric view of utilising natural areas and incorporate an African view on how to utilize natural areas for recreation purposes

Answer: I agree with the view that there is a need to move away from a preservationist approach to nature areas and to adopt a multi-purpose approach.

Comment : S.Parker (DATA)

The tourism industry reflects the problems of those found in the environment. We have to question what pro-active steps are being taken to benefit displaced communities as well as to ensure effective grassroots participation in tourist and ecotourist initiatives.

5.1.2.3 Holistic View

Question: Heideveld ANC

As pointed out in the report, overpopulation and increasing urbanisation are major issues which have a serious impact on the environment. Will the management team address the issue of overpopulation?

Answer: The team will not address the issue of overpopulation. The aim of the UCT team was to identify problems impacting on the Cape Peninsula and to put forward broad guidelines upon which planning decisions can be based. Putting forward strategies to address the problem of overpopulation is not part of our brief.

Comment: F. Fredericks, EERU, UWC

There is a bias towards the natural environment in this study but there is a greater need to look at the socio-economic conditions of, for eg, squatter communities.

5.1.2.4 Cape Peninsula Heritage Authority

Question: Private citizen

What is the function of a single authority? What issues and areas are they going to address?

Answer: The draft policy document provides guidelines for the powers and duties of this authority.

Comment: Employee, Parks and Forests, Cape Town City Council

I agree that a single authority should be in charge - such an authority should specifically address the issue of jobs and emphasise the importance of environmental education.

5.1.2.5 Cape Peninsula Heritage Area

Comment: Teacher, Immaculata

1 question the validity of the name, 'Cape Peninsula Heritage Area', because the heritage of the past has been apartheid. Apartheid affected everything, the cultural heritage also. What about 'The Greater Peninsula Park'?

Answer: Apartheid is not the only South African heritage and was not in the minds of those who came up with the name.

5.1.2.6 Business and the Environment

Question: **UBUNTU**

Surely business can be regarded as constituting a definite threat to the environment due to unthinking development?

Answer: The draft report provides guidelines which will prevent inappropriate and uncontrolled development.

5.1.2.7 The Cape Peninsula as a Special Place

Comment: Teacher, Atlantis

Every area is special to the people who live there - it is not just the Cape Peninsula which is special. What about areas which were neglected under apartheid? What will be done about the environmental problems of the black townships?

5.2 Public Meeting, Mitchells Plain - Farieda Khan and Yana Jeftha

Date: 21 May 1994

Venue: Nicro Hall, Eastgate, Mitchells Plain

5.2.1 Attendance

M. Miller, Mitchells Plain Youth Development Programme (MPYDP)

L. Muller, Co-Plain

E. Oliver, African National Congress(ANC)

I. Abrahams, Ministers Fraternal

D. Brown, Ministers Fraternal

G. Campher, Democratic Party (DP)

5.2.1 Discussion

5.2.2.1 Boundaries: Incorporation of the Cape Flats into the Draft Policy

Question: D. Brown (Min. Frat.)

Why is Mitchells Plain not included in the Draft Policy? - we have Wolfgat Nature reserve, Mnandi Beach and Strandfontein.

Comment: I. Abrahams (Min. Fret.)

The Cape Flats environment is very degraded. There's nobody really taking notice of this area. Mitchells Plain is a concrete jungle, there are no trees. How can we go about greening the environment?

Question: Co-Plain

Why don't they look at the Cape Flats and the Cape Peninsula as one area and not two separate entities? We need an Integrated plan. It should be an inclusive process.

Answer: The EAU's area of study is only the Cape Peninsula as we saw on the map I showed you. But there are a number of other studies taking place within the Cape Metropolitan Area, which involve structure plans and development guidelines for the Cape Flats. In addition, the EAU is also involved with environmental issues on the Cape Flats, having been approached by Mitchells Plain schools to conduct a survey of public opinions of Wolfgat Nature Reserve. We have also assisted the Kramat Community in Macassar, who would like to ensure the protection of the dune system and fynbos in the future development of Macassar.

With regard to greening and improving the environment, there are many other organisations involved in helping communities, such as the Fairest Cape. The City Council offers trees to the public, and the University of the Western Cape has a nursery where Cape Flats communities are helped to grow indigenous plants and trees.

5.2.2.2 Development Vs. Preservation in nature areas

Question: D.Brown (Min. Frat.)

We are concerned about nature - recently we've seen how vegetation was burnt and destroyed in the hunt for the 'Station Strangler'. Some time ago I was told that the area in front of my house in Mitchells Plain was part of a nature reserve, but then it was developed. There is development on Strandfontein beach which could cause extensive environmental damage, but which will nevertheless inject much needed capital into these areas. How does one reconcile this issue - money V preservation?

Answer: Although the draft report attempts to provide guidelines for sympathetic development only in the Cape Peninsula, I believe its development guidelines would be broadly applicable elsewhere. However, we accept that there are many problems which are specific to the Cape Flats. We therefore urge you, via civic associations and government structures to recognize and address the environmental problems of the Cape Flats.

Comment: D. Brown (Min. Frat.)

It is clear now that the Draft Policy is a guideline - suggesting ways of development that are not detrimental to the natural areas of the Cape Peninsula, promoting instead the policy of preserving it for future generations.

5.2.2.3 Policy and Principles

Question: L. Muller, (Co-Plain)

What about the baboon problem?

Answer: The report does not specifically address the issue of baboons. But because baboons are part of the biotic diversity of the area, they are protected and thus incorporated in the specific recommendations for protecting biotic diversity.

Question: D. Brown, (Min. Frat.)

Are you also concerned with marine issues? - the False Bay coastline and netting of marine life?

Answer: Although I can't give you a specific answer, I can assure you that the management plan is concerned with marine life, as part of its recommendation for protecting biotic diversity. The protection of dolphins and whales in particular, constitutes an important part of eco-tourism.

Question: D. Brown, (Min. Frat)

The natural areas used by the South African National Defence Force, have been delegated as no-go areas. But these are particularly scenic areas and should be made more accessible.

Answer: This is definitely a real concern. The question of access, as well as the boundaries of those particular areas, are key issues and the UCT team is attempting to ensure that there is easy access to all areas of the Cape Peninsula by all South African citizens. We are concerned only that access be regulated and controlled in such a manner that the Peninsula is conserved for future generations.

Question: D. Brown, (Min. Frat.)

Were private landowners (Noordhoek, Constantia etc), mining companies etc, involved in the drawing up of the policy?

Answer: Yes, all interested parties were involved. Several workshops, targeting specific interest groups have been held.

5.2.2.4 Cape Peninsula Heritage Authority

Comment: L. Muller, (Co-Plain)

A single authority is a good idea because it would be more efficient.

Comment: MPYDP

We are happy with the idea of a single authority.

Comment: D. Brown, (Min. Frat.)

I agree with the comment made by, L. Muller, but sub-committees should be introduced to make it more accessible at a grassroots level.

Comment: L. Muller, (Co-Plain)

The authorities in charge should be accountable to the public.

Answer: As can be seen in the proposals put forward in the draft report, the intention is definitely that the authority be as representative as possible, and that it be directly accountable to the public. This authority will not only consist of experts and specialists - experts don't necessarily have all the answers, so it will be representative of the public as a whole.

Question: D. Brown, (Min. Frat.)

Will everybody involved be represented on this single authority?

Answer: The intention is that it will be as representative as possible, including mining companies and landowners. It will also represent those concerned with the environment, culture and history.

Question: L. Muller, (Co-Plain)

If this authority only has jurisdiction over the Cape Peninsula, then that means there will have to be another authority for the Cape Flats. Why does there have to be different authority to look at the Cape Flats?

5.2.2.5 Cape Peninsula Heritage Area

Comment: Co-Plain

It's quite a good name, it sums up quite accurately the area being protected - but perhaps it should have the word, 'preservation' in it.

Question: I. Abrahams (Min. Frat)

Who suggested the name?

Answer: The name was suggested by the management team but as it is a draft, it is basically up to the people of Cape Town to choose a name.

Comment: I. Abrahams (Min. Frat.)

I definitely feel that the name, Cape Peninsula, is exclusive of the Cape Flats - the name should be more representative of the entire W. Cape.

Answer: The name, 'Cape Metropolitan Area', of course includes the Cape Peninsula as well as the Cape Flats.

5.2.2.6 Environmental Education

Comment: I. Abrahams (Min. Fret.)

We need to green areas like the Cape Flats as well as highlight the need for environmental education as part of the process of reconstruction.

Comment: E. Oliver (ANC)

People at a grassroots level should be made aware of environmental issues.

5.2.2.7 Additional Comments

Comment: E. Oliver (ANC)

I don't really know much about environmental issues and I've learnt a lot at this meeting. It's the first time that a meeting like this has been held in Mitchells Plain, that I'm aware of.

Comment: 1. Brown (Min. Frat.)

It is important that we have meetings like this. There should be more such meetings - we need to know more about our environment.

5.3 Public Meeting, Langa - Jongile Gqodvvana and Mkhululi Auwa

Date: 21 May, 1994

Venue: Langa Civic Hall

5.3.1 Attendance

Nompumelelo Garden Club, Langa
K.N.. Ndlumbini, Thembani Public Primary School
Nompumelelo Garden Club, Langa
V. Thundleni, Committee of Ten, Langa
Nobom, Langa

5.3.2 Discussion

it was pointed out that the main report is available in all the Cape Flats libraries. This would assist everyone in getting to know the details and to be able to complete the questionnaire. The chairman gave time for discussion and questions.

5.3.2.1 Policy and Principles

All those who attended were satisfied and supported the draft policy. They regarded it as informative and educative.

5.3.2.2 Public Participation

The general feeling was that, efforts to inform the public should be stepped up. They believed that organised tours to the Cape Peninsula could be very helpful in that regard.

The audience was concerned about the poor attendance. The principal of Thembani Junior Primary School proposed that she organise another meeting which her staff would attend, as she felt that this would increase their awareness of the environment. She was supported by V. Kasana of Nompumelelo Garden Club, who was also concerned about poor attendance.

The proposal was put forward in the light of making the final document as inclusive as possible. The chairman promised to take the matter forward to the UCT team.

5.3.2.3 General Comments

They attributed the poor attendance to the fact that Saturday is a bad day for meetings. They suggested that meetings should be held on weekdays.

5.3.2.4 Cape Peninsula Heritage Authority

They strongly supported the idea of a single authority as proposed in the draft report.

5.3.2.5 Availability of Draft Report

They complained that the draft report, which was supposed to be in all the libraries, was unavailable in Lange.

The meeting was closed in a great spirit of optimism about the future of the Cape Peninsula Heritage Area.

5.4 Public Meeting, Khayelitsha Jongile Ggodwana and Mkhululi Auwa

Date: 28 May 1994

Venue: Site B Hall, Khayelitsha

5.4.1 Attendance

R. Dyantyi, African National Congress, Khayelitsha Branch

C. Hobanie, Democratic Party, Mitchell's Plain Branch

V. Jaxa, Site B, Khayelitsha

M.S. Matsila, Pan Africanist Congress (PAC), Khayelitsha Branch

5.4.2 Discussion

5.4.2.1 General Comments

R. Dyantyl from the ANC pointed out that it was very difficult to make inputs as the information was new to them. He said that the meeting was very informative, and suggested that another be held. He said that this would give them time to study the report in detail. He was supported by C. Hobanie (DP) in this. They were promised that this suggestion would be forwarded to the UCT team.

5.4.2.2 Questionnaire

The ANC representative told the meeting that it was not happy about the questionnaire as it is too narrowly focused and is not flexible enough to allow respondents to air their views. He felt that it was intended to help the researcher only.

5.4.2.3 Policy and Principles

The PAC representative supported the ANC speaker and wanted to know if it was possible to get hold of the old policy document. He was satisfied when he was told that this was the first one. He said he would have liked to have seen it, so that he could see whether there had been an improvement in the new draft.

Question:

The DP representative, C. Hobanie wanted to know whether the 14 Authorities had been consulted.

Answer: He was told that all interest groups had been consulted.

Question:

He also wanted to know whether the new constitution made provision for this kind of policy.

Answer: The question was to be conveyed to the UCT team.

Comment: Colin Hobanie (DP)

He felt that the procedure being followed was okay, but that they needed more time to study the draft policy. The ANC felt that Saturday is a bad day for a meeting. The ANC also said that they would be happy if the meetings could be organised in such a way that most people on the ground could attend. The DP representative suggested that if another meeting was to be held, the draft policy should be circulated before the meeting in order to ensure fruitful discussion.

The meeting was closed.

5.5 Public Meeting, Langa - Jongile Gqodwana and Mkhululi Auwa

Date: 1 June 1994

Venue: Langa Library

5.5.1 Attendance

B. Vilakazi, Langa
 N.P. Khumalo, Nyanga
 P. Kwatsha, Langa
 A. Dyan, Nyanga East
 P. Malangabi, Langa
 M. Gumede, Langa
 H. Fonggo, Langa
 N. Kasana, Langa
 M.S. Matsila, Langa

5.5.2 Discussion Period

The audience unanimously supported the draft report, but only if something could be done about the filthy Langa streets. They felt that the organisations dealing with the Cape Flats should have moved faster than the Cape Peninsula one. This was stated after they were told that there are other studies dealing with the Cape Flats. The general feeling was that they would find it hard to worry about the Cape Heritage Area when the environmental conditions in Langa are indescribable.

The meeting was closed.

5.6 Public Meeting, Langa ° Jongile Gqodwana and Mkhululi Auwa

Date: 01 June, 1994

Venue: Thembani Junior Primary School, Langa

5.6.1 Attendance

**S.N. Maziko, Gugulethu
N.M. Sishuba, Mandalay
M. Gumede, Langa
E.K. Mkosi, Gugulethu
T.G. Mbelwa, Langa
N.L. Dwangu, Gugulethu
J.N. Tikolo, Langa
L.T. Mehlomakulu, Langa
S.H. Gongxeka, Langa
C.N. Gaika, Gugulethu
N.E. Mtuzula, Langa
Y.T Vamp, Langa
V.N. Salman, Khayelitsha
P.L. Luwaca, Montana
T.C. Ngoko, Langa**

5.6.2 Discussion

5.6.2.1 Policy and Principles

The audience was delighted by the report and supported it unanimously.

5.6.2.2 Public Participation

They wholeheartedly supported the idea of public participation and hoped that the draft policy recommendation to educate the public about the Cape Heritage Area as an asset, would be carried out. They said this was a pressing necessity as it is difficult for one to take responsibility and protect what one does not know.

The meeting was closed.

5.7 Overall Comments on the Meetings in Lange and Khayelitsha

The people supported the general policy guidelines, but lacked information about the Cape Peninsula. They were concerned about the fact that nothing was being done to improve environmental conditions in the Cape Flats. They also supported the idea of public participation.

6. CONCLUSION AND RECOMMENDATIONS

All the meetings held on the Cape Flats had certain common elements, and highlighted certain common problems:

Firstly, the majority of the people who attended had no problems with the draft policy, accepting, in the main, the principles upon which it was based, and the recommendations which were put forward. However, this should be seen in the context of the fact that most people had not read the document prior to the meeting.

Secondly, it was clear that many people were not familiar with many of the geographic areas discussed, or issues raised in the report. Several speakers mentioned that they had never visited Cape Point, because it was too expensive to enter the reserve; while others admitted that they were unclear about the issues raised in the report, and were thus unable to respond. Some speakers suggested holding public meetings *after* an initial meeting at which the issues had been explained. Other speakers maintained that more than one meeting was necessary in order for the issues raised to be properly discussed within their organisations.

Thirdly, most speakers at the meeting were concerned about the fact that the report dealt only with the Cape Peninsula, and did not address the many serious environmental and development problems on the Cape Flats. This perceived shortcoming angered several speakers. Even though it was pointed out that there were other studies⁶ which would provide guidelines for the future development of the Cape Metropolitan Area, members of the public remained dissatisfied, feeling that an integrated plan for the whole of the Peninsula and the Cape Flats should have been dealt with simultaneously. Members of the public felt that the identification of the Cape Peninsula as a 'special' place, meant that the Cape Flats was once again being ignored and neglected - just as it had been under the old dispensation.

Fourthly, the principle of public participation was overwhelmingly endorsed. It was clear that members of the public expected to be consulted, and to be fully

⁶ For example, local authorities such as the Regional Services Council and the Cape Town City Council are involved in detailed structure plans for the Cape Flats, while the efforts of the Metropolitan Development Forum are concentrated on plans for the development of the Cape Flats.

involved in planning proposals. Notwithstanding the abovementioned problems, many speakers expressed their interest in the issues raised and were eager to know more about environmental and development issues affecting the Cape Metropolitan Area. Several speakers also expressed the hope that these meetings were just the beginning of an ongoing process which would keep the public informed of projects affecting them.

Fifthly, while a tremendous amount of effort had gone into organising the public meetings in an attempt to ensure good attendances, the generally low attendances were an indication that additional, or different strategies are required. The distances that residents of Mitchells Plain and Khayelitsha had to travel even to reach a central venue within the area, definitely affected attendance at those meetings.

Finally, it is evident that the apartheid legacy of poor education has contributed in large measure to the high levels of ignorance about environmental issues among black communities which was demonstrated at the meetings. This once again highlights the need for environmental education aimed at adults, as well as the youth, in black communities. In addition, the cumulative effect of the Separate Amenities Act (abolished in 1990) and the Group Areas Act (abolished in 1991), has resulted in widespread unfamiliarity among black Capetonians with many parts of the Cape Peninsula. These problems present obstacles to the involvement of previously marginalised communities, and will have to be dealt with if black communities are to become fully involved in public participation in the future.

Based on the above, the following recommendations are made:

- Public meetings should incorporate a strong education component, and should ensure that the issues are fully, but clearly and simply explained.
- Local issues and problems must receive prominence, or, at the very least, be integrated into the agenda of public meetings.
- More than one public meeting to discuss a particular issue should be held.
- More than one venue within large settlements and townships should be utilised for public meetings.
- A longer period should be allowed for the public participation process.

Tap into the existing support base of community organisations such as civic associations and community institutions such as schools and libraries, by utilising part of their meetings or official hours.

Despite the problems identified during this series of meetings on the Cape Flats, the meetings themselves were highly successful, in that the full participation of the audience was secured. This may be attributed to the relaxed atmosphere, the familiarity of the venue, as well as the fact that the meetings were conducted very informally. Members of the public were also encouraged to speak in their home languages. Thus, despite the fact that several members of the public were at first reluctant to speak, saying that they did not know enough about the issues involved, most went on to speak their minds.

The public's right to know about issues of concern, and their right to be involved in decisionmaking, was strongly supported at these meetings. This high level of support for the principle of public participation among disadvantaged communities⁷ bodes well for the future of environmental management in South Africa. However, for the principle of public participation to be more than an empty catchphrase, alternative and creative strategies will have to be devised in order to ensure the active involvement of all sectors of the public.

⁷ An opinion survey of Mitchells Plain residents and visitors to Wolfgat Nature Reserve on the Cape Flats, also demonstrated extremely high levels of support for the principle of public participation (Khan, 1994).

7. REFERENCES

Department of Environment Affairs. 1992: Guidelines for Scoping. Guideline Document 2.

Draft Policy for the Multipurpose Use of the Cape Peninsula. 1994: Vol. 1, University of Cape Town.

Draft Policy for the Multipurpose Use of the Cape Peninsula. 1994: Volume 2, Appendices 1 - 14, University of Cape Town.

Khan, F. 1994: Wolfgat Nature Reserve - A report on the opinions of visitors and Mitchells Plain residents. Environmental Advisory Unit, Draft Report.

Nottingham, I. 1990: Social Impact Reporting: A Maori Perspective - The Taharoa Case. *Environmental Impact Assessment Review*, 10, pp 175 - 184.

Preston, G.R., Robins, N. and Fuggle, R.F. 1992: Integrated Environmental Management. IN *Environmental Management in South Africa*. R.F. Fuggle and M.A. Rabie (eds). Juta and Co, Ltd., Cape Town.

Ross, H. undated: Opportunities for Aboriginal Participation in Australian Social Impact Assessment. Unpublished Paper.

Ross, H. 1990a: Progress and Prospects in Aboriginal Social Impact Assessment. *Australian Aboriginal Studies*, 1, pp 11 - 17.

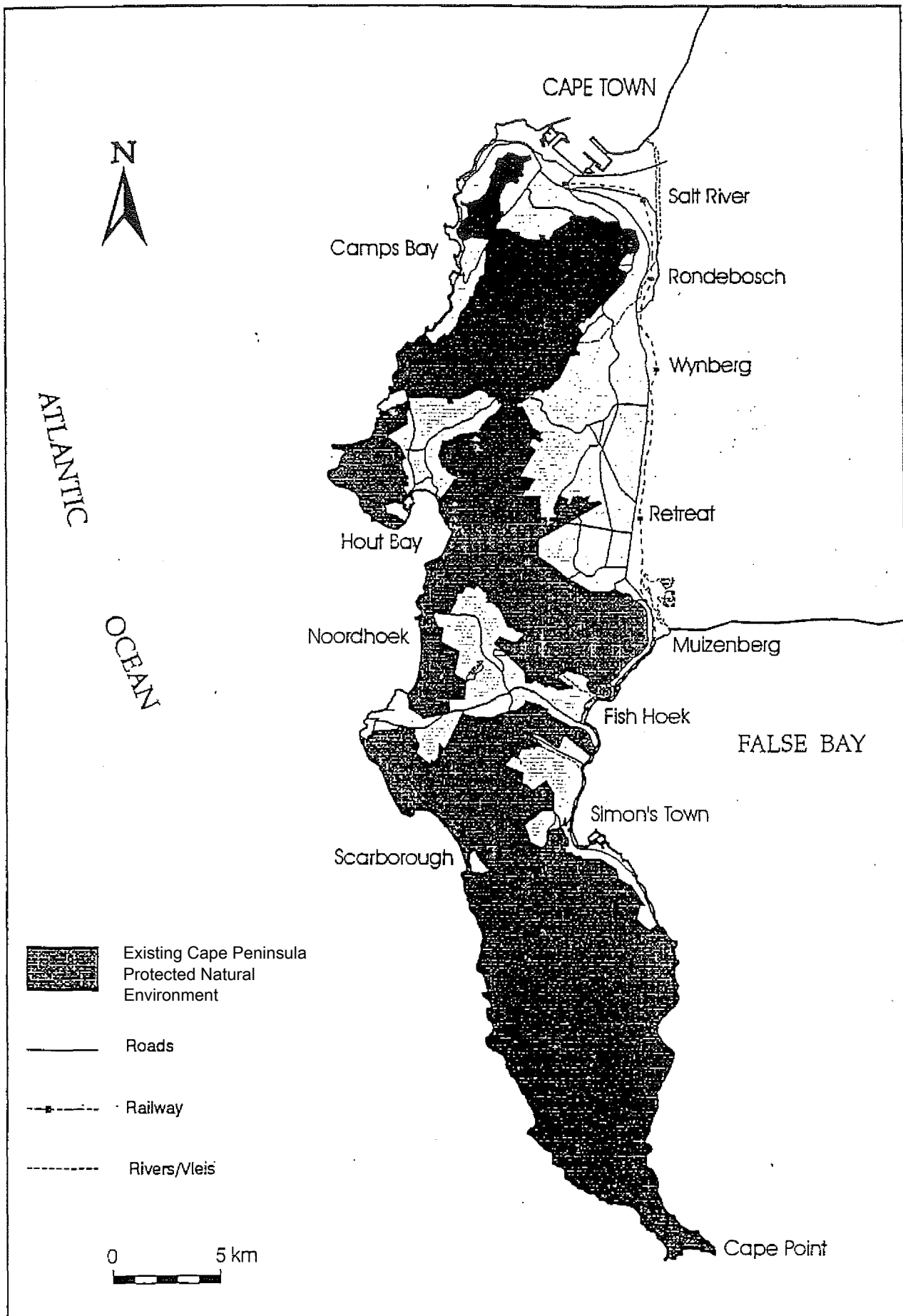
Ross, H. 1990b: Community Social Impact Assessment: A Framework for Indigenous Peoples. *Environmental Impact Assessment Review*, 10:1-2, pp 185 - 195.

Sowman, M. 1993: Improving the Practice of Public Participation in Environmental Planning and Decision-making in South Africa. *Town and Regional Planning*, no. 36, pp 20-31.

Sowman, M. and Gawith, M. pending: Participation of Disadvantaged Communities in Project Planning and Decision-making: A case study of Hout Bay, Cape. *Development Southern Africa*.

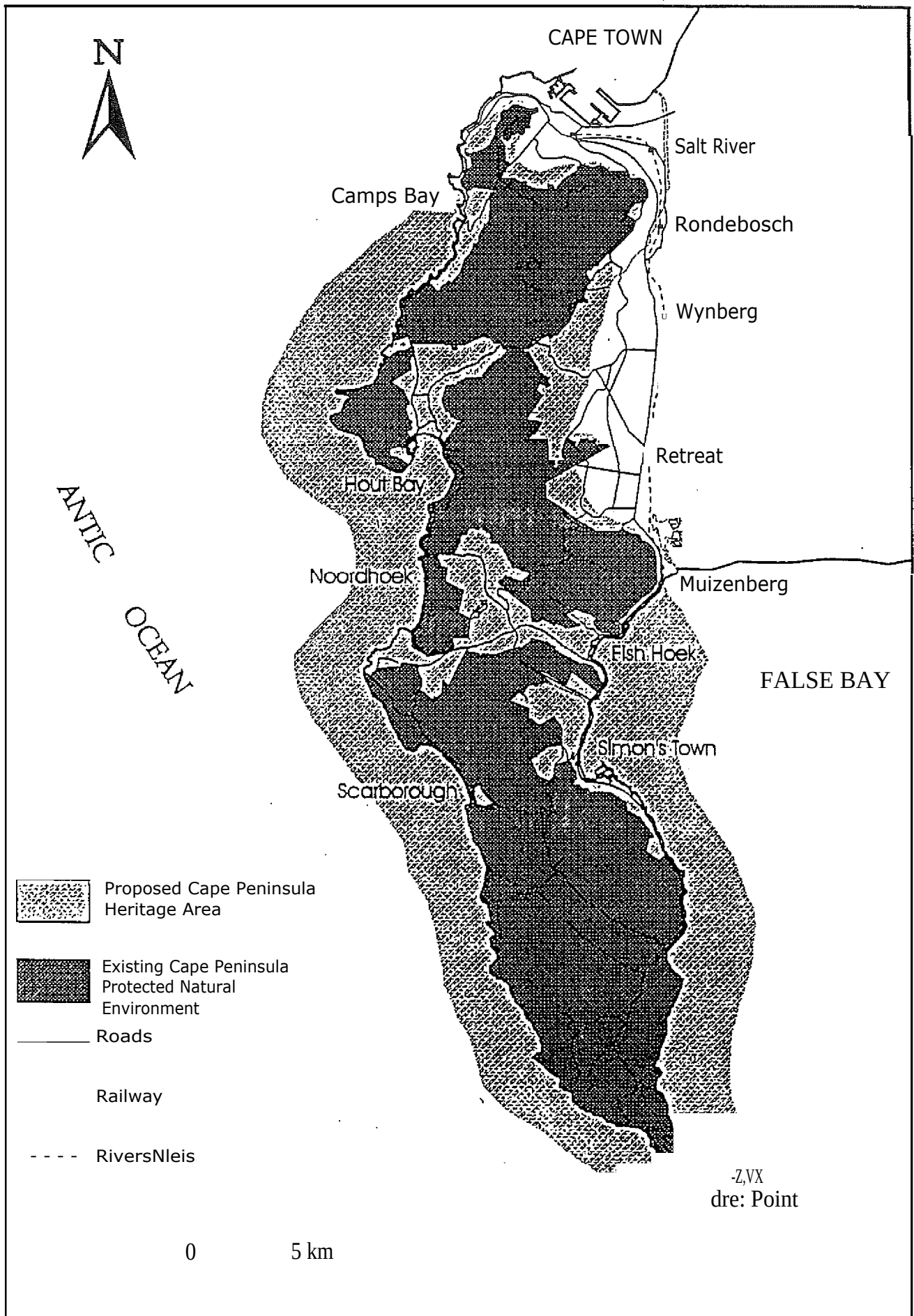
APPENDIX 1

**The area legally defined as the Cape Peninsula
Protected Natural Environment (CPPNE).**



APPENDIX 2

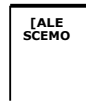
**The Cape Peninsula as defined by this investigation.
(For legal purposes, this area is also referred to as the
Cape Peninsula Heritage Area.)**



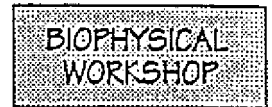
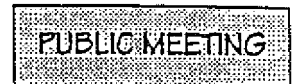
APPENDIX 3

NE PROCESS BEING FOILOWED IN THIS INVESTIGATION

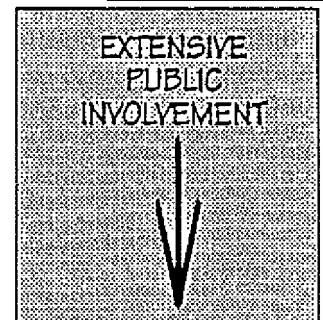
UCT RECEIVES PROJECT 1EF FROM 01E1115 (Feb 1983)



itsrm
14-



LEGAL WQKSHOF



USI FEATURES/VALUES OF THE CAPE PENINSULA



4,447X



ISYLLICIS
REANICES



'if

MAPPING OF SENSITIVE AREAS OF THE CAPE PENINSULA



0.1111441

MAPPING EXISTING USES OF THE CAPE PENINSULA



GiAra1140

1:ELREACCH
1176751.1

1:480.14
PLVD. ORIENT

YELD
WATERING



DESCRII3ING FUNCTIONAL AREAS FOK THE CAPE PENINSULA

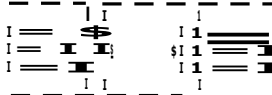


SELECTING MANAGEMENT TOOLS



riVki1341

DRAFT POLICIES



PUBLIC OPINION



01:116.455
77.173.1XIS



EVALUATING PUBLIC COMMENTS



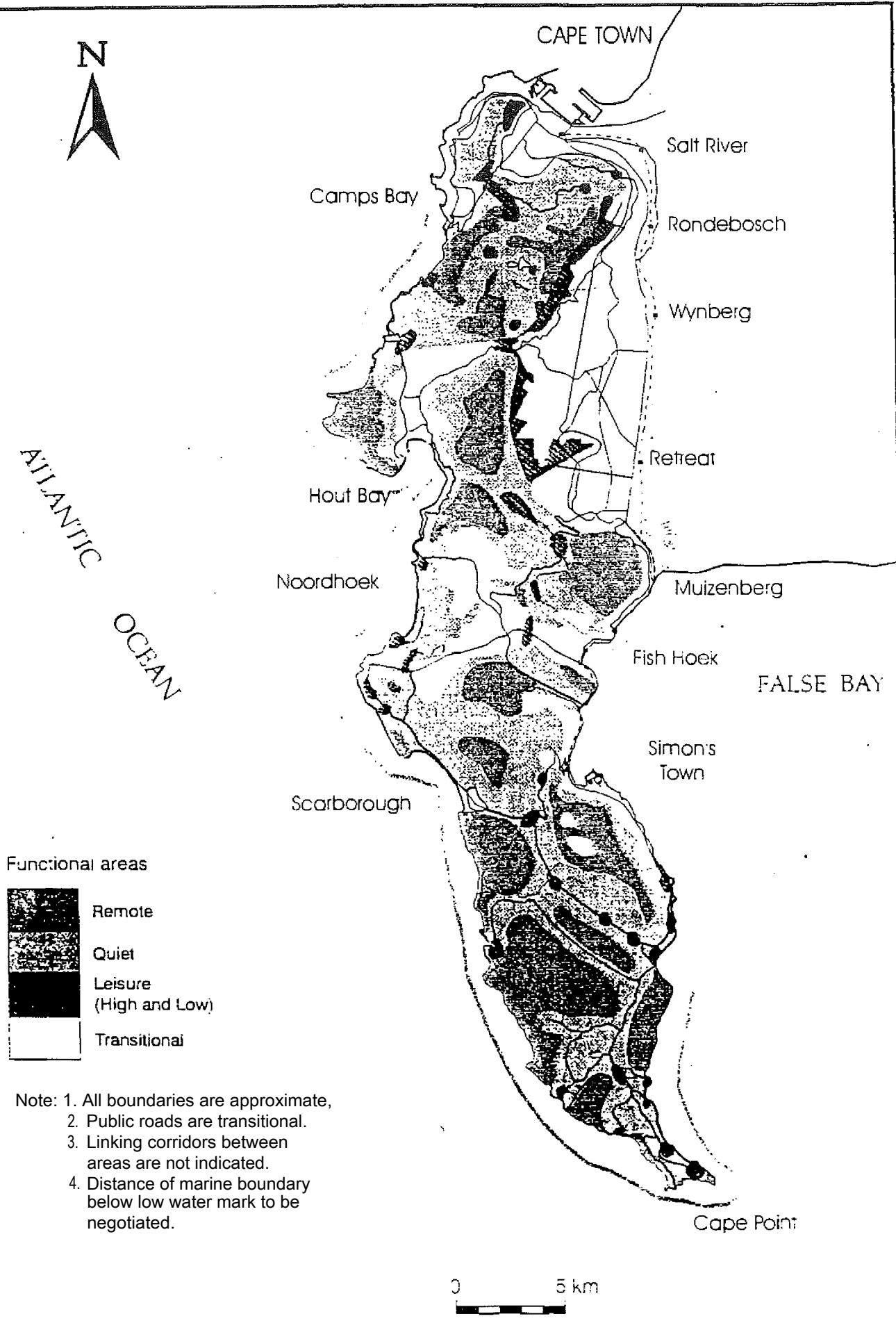
RECOMMENDATIONS (July 1994)



MEETINGS WITH KEY INTERESTED
AND AFFECTED PARTIES

APPENDIX 4

Functional areas within the Cape Peninsula Heritage Area: Schematic,



APPENDIX 5

POLICY FOR THE WISE USE OF THE CAPE PENINSULA

A short popular version of the University of Cape Town's full report: "Draft Policy for Multipurpose Use of the Cape Peninsula".

This shortened report is not intended to be as detailed as the full report. It is meant to give the reader a basic understanding of the main issues discussed and the final conclusions and recommendations that have been made.

This is not a final document - it is a draft document that will be changed when people and organisations have responded to it.:

The full report is available at all libraries throughout the Cape Metropolitan Area, if you would like more detail.

Please let us know what you think about the ideas in this document. Do you think that the Cape Peninsula is a special area that needs better protection? Do you think that different areas of the Cape Peninsula should be used in different ways? Do you think that a single authority should be in charge of the Cape Peninsula? Do you think that the "Cape Peninsula Heritage Area" is a good name, or can you think of a better name?

The University of Cape Town's report is about a policy and a plan, showing how the Cape Peninsula can grow and change. This plan is necessary so that both the people and the environment can benefit.

The Cape Peninsula belongs to everyone who lives and works here, and is also important for people who visit it. The fluff report talks about a plan that will make it possible for everyone to enjoy the area'. Everyone must benefit from any development that takes place in the future. It must not be for a few people only.

Upgrading of the Cape Peninsula has to take place, but it must grow in the right way, so that we find a balance between people's needs and nature's needs. If we destroy one, we will destroy the other.

THE FULL REPORT SHOWS THAT THE CAPE PENINSULA IS A VERY SPECIAL AREA:

- Our 'natural environment' is made up of the sea, the mountains, the water, the forests and the veld. They are all rich in the many things that grow and live there. This is important because we use this richness for some of our medicines, wood, food and building materials. Rivers, seas, land, plants and animals are also important because they help to clean water and absorb pollution, and keep our soil productive. Plants hold the soil together and stop erosion.

- Our 'cultural environment' is also special - the beauty of the Cape Peninsula is known about throughout the world, and there are many interesting buildings and symbols - like Table Mountain itself - in the Peninsula.
- We live and work in the middle of this beauty and richness, but it can easily be destroyed if we do not look after it properly. It can help to "sustain" or keep us well, If we look after it.
- There are also people who visit the Cape Peninsula to see our special place. Many of them are tourists and they come from all over South Africa and from overseas. Tourists are important to the Peninsula because they bring money and Jobs for us. So we must preserve the "specialness" of the Cape Peninsula for all the people who live in, or visit, the area.

The full report talks about the problems the University found when they did a: study of the Cape Peninsula, before they wrote the report.

The report talks about problems because of the Cape Peninsula growing too quickly, without a proper plan. It shows how, if this happens, we can destroy things. The report also shows how, In the past, some people were planning. But there were too many different people with too many different plans, so things did not work out properly. Also, not all the people of the Cape Peninsula were consulted and the planners were not properly accountable to all the people who were affected by these plans.

The report says that all this must change - we must work in a new way. We must get ideas om as many different people and organisations as possible. There must be one, big policy and plan that we can all work towards. In this way we will be able to control growth in the best way possible.

THESE ARE THE MAIN POINTS THAT THE NEW POLICY AND PLAN SHOULD ADDRESS:

- * The policy must be workable, and the main principles must be able to last for a long time.
- * The policy must be for the good of all the people - it must be fair - for those who live here and those who visit.
- * It must also be a fair policy that works for everyone - for landowners, shopkeepers, investors, working people, and for people using the Cape Peninsula for sport or recreation.
- * Members of the public must be able to participate in the planning and in the management of the policy. In this way, we will all be able to say how the Cape Peninsula should be used.

People who carry out the policy and manage the plan on a day-to-day basis, must be fully accountable to the public for their actions. They must also be accountable for the money they spend.

Some parts of the policy must be able to change - the policy must be adaptable, so that when the needs of people and the environment change, so the policy can be adapted.

FINALLY THE REPORT MAKES SUGGESTIONS FOR THIS NEW POLICY.

Ed The policy must begin as soon as possible and a proper authority must carry out the policy.

indr We must make the Cape Peninsula a good place for people who live, work and visit here.

We must find a way to look after the beauty of the Cape Peninsula - the land, the water, the forests, the mountains and the sea. In this way, we can use them to make life better for us. If we do not, it will cause big problems for us. We must plan and manage the Peninsula so that we get the best use out of It for our work and our play, without destroying the natural or the cultural environment.

ti Some areas will have to be special areas and we will have to protect them and keep them separate. They may be places from our history, places where we worship, or places where nature must be left alone without people interfering. We will not be able to build houses and make fires and keep animals in these places. But we will be able to visit and enjoy these places.

ti Different areas of the Cape Peninsula should be used in different ways. The policy guideline shows how some areas can be used better for one thing than another. For example, some areas are good for building houses, other areas are best suited for family picnics, and other areas will be best used for people wanting to walk and enjoy nature.

ti The report also says that Government should pass one new law to allow the whole Cape Peninsula, including its water, seas, forests and land, to be properly protected and improved. The report calls this area the "Cape Peninsula Heritage Area".

itEr Any changes to the plan must be controlled carefully so that there is a balance between people's needs and nature's needs.

ma A single authority should be in charge of managing the plan. The report calls it the "Cape Peninsula Heritage-Area Authority". This Authority must have people on its committees from different sectors, representing all- the

different people of Cape Town. The Authority must be the caretaker of the the Cape Peninsula for the people of South Africa.

Money should come from the public sector in the form of national, regional, and local governments, as well as from the private sector. This money would be to support the work of the Authority. The Authority should also be able to make money like a business, so that It can employ people to help look after the Cape Peninsula.

14 This "Cape Peninsula Heritage-Area Authority" should also have enough power to carry out the policy, once everyone has decided on it. It should be able to control development in the Cape Peninsula In the best way.

When the policy is completed, it will be important .o support it. It will belong to all of us and we will all benefit from it. The Authority must set short and long term goals and plans, that can be :flecked from time to time. In this way we can ee what progress is being made.

Any comments or questions? Phone or write to:

**Sue Lane or Rachel Wynberg
The Environmental Evolution Unit
University of Cape Town
Private Bag, Rondebosch 7700
Tel: 650 2868;
Fax 650 3791**

This document was prepared by Rose Meny-Gibert of Community Education Resources, African Studies Department, UCT, and translated into Afrikaans by Amanda Siegruhn and Into Xhosa by Sidima Mntubu.

Naziphi na iimbono zingathunyelwa Rule dilesi:

The Environmental Evaluation Unit

University of Cape Town

Private Bag, Rondebosch 7700

Ukuba unemibuzo ungatsalela uSue Lane

okanye uRachel Wynberg Rule nombolo:

Umnxeba: 650 - 2868

IFaksi : 650 - 3791

Olu xwebhu luqutunqwe nguRose Meny-Oibert weZifundo ngeZibonelelo zoLuntu, ICandelo leZifundo nge-Afrika, UCT yaguquielwa kwisi-Afrikaans ngu-Amanda Siegruhn nasesiXhoseni nguSidima Mntubu.

INDLELA YOKUSETYEINZISWA PA NGOBUL KO

Inkcazo emfutshane edumileyo yengxelo yeYunivesiti yaseKapa: "Uyilo Lomgaqo Wokusetyenziswa Ngeendlela Ezininzi KweNcam YeKapa".

Le ngxelo yenzfwe mfutshane ayilungiselehranga kuba nazhikcukacha njengengxelo ezeleyo. Vol/ sive ekunikeni umfimdir uhrazi ngemfba ekuxoxwe ngayo neziphurno nezindululo ezenzlweyo.

AsHoxwebhu fokugqibela olu luxwebhu loyllo oluya kuguquhra bakuba abantu nemibutho benike ezabo Izimro ngalo,

Ingxelo ezeleyo iyafumaneka kuwo onke amathala eencwadi kwisixeko ittapa, ukuba ufuna ilnkucukacha ezithe chatha.

Nceda usazise ukuba ucinga ntonl na ngeembono ezlqulathwe lolu xwebhu. Ucinga ukuba iNcam yeKapa yindawo eyodwa efanelewe lukhuselo olungcono? Ucinga ukuba iindawo ezahlukeneyo zericam yeKapa mazitsetyenziswe ngeendlela ezahlukeneyo? Ucinga ukuba iNcam yeKapa maylphathwe 1113hunga eiinye loLawulo? Ucinga ukuba eli gama lithi "Cape Peninsula Heritage Area lilungile, okanye ungacinga iganta elingcono?

Ingxelo yeYunivesiti yaseKapa ingomgaqo noyilo, olubonisa Indicla enokulthula iguqulte ngayo iNcam yeKapa. Olu yilo luyimfuneko ukuze kuxbarnle abantu nendalo.

INcam yeKapa yeyomntu wonke ohlala nosebenza apha, ikwabalulekile nakubantu abayindwendwelayo. Ingxelo ezeleyo ithetha ngoyilo oluya kwenza uliuba wonke umntu ayonwabele le ndawo. Wonke umntu kufuneka axhamle kulo naluphi na uphuhliso olwenzeka •kwixesha elizayo. ftlalungabi lolwabantu abambalwa kuphela.

Ukuphuculwa kwellcam yeKapa kufuneka kuqhubeke, kodwa kufuneka ikhule ngendlela eyiyo, ukuze sifumane ukulingana phakathi kweernfuno zabantu neemfuno zendalo. Ukuba kukho esikutshabaialisayo, siyakutshabalalisa nokunye.

INGXELO EZELEYO IBONAKALISA UKUBA INCAM YEKAPA YINDAWO EYODWA KAIMULU.

- !tidal() esingqongileyo yenziwe ngolwandle, lintaba, amanzi, amahlathi namathafa. Zityebile xa zizonke nuezinto ezlnlnzl ezlkhula ziphile apho kuzo. Oku kuba slsebenzlsa obu butyebi kwamanye „Lilayeza ethu, iinkunl, ukutya nezinto zokwakha. lik IIIwandle, umhlaba, Izityalo nezilwanyana kuba zinceda ekucocent amanzi 1,,sckufunxenl ukungcola, zigcine umhlala wethu Liiciciivellso. Izityalo zlgcina umhlaba ubambene Lit I inteie ukhukhuliseko.

"Amaslko" ethu akwabaluleke ngokukodwa - ubuhle beNcam yeKapa baziwa phantse elizweni jikelele, kukho izakhiwo neembasa ezlnlnzl ezinika umdla - njengeNtaba yeTafle ngokwayo - kwiNcam yeKapa.

- Siphila, siphangele embindini wobu buhle nobutyebi, kodwa bungatshabalala Ma ukuba asibukhathalell ngendlela eyiyo. Bungasinceda slphile kakuhle ukuba siyabukhathalela.
- Kukwakho nabantu abandwendwela INcam yeKapa ukuza kubona indawo yethu eyodwa. Abaninzi kubo ngabakhenkethi yaye bavela kuMzantsi Afrika uphela naphesheya. Abakhenkethi babalulekile kwilleam kuba bezisa imali nernisebenzi kuthi. Ngoko kufuneka sigcinele bonke abantu aBahlala, nabandwendwela iNcam yeKapa "ukubaluleka okukodwa" kwale ndawo.

Ingxelo ezeleyo ithetha ngeengxaki ezirunyepwe yiYunivesiti le xa ibisenza uphando ngeNcam yeKapa phambi kokuba ibhale ingxelo.

Ingxelo ithetha ngeengxaki ngenxa yokukhula ngokukhawuleza kweNcam yeKapa, ngaphandle koyilo olululo. Ibonisa Indlela esinokuthi ngayo sitshabalalise izinto xa kunokwenzeka oku. Ingxelo ikwabonisa indlela ababeyila ngayo abanye abantu mandulo. Kodwa kwakukho abantu abaninzi abahlukeneyo neendlela ezininzi kakhulu ezahlukeneyo, ngoko ke Izinto azahamba kakuhle. Kwakhona, kwakungekho luthethwano nabo bonke abantu beNcam yeKapa yaye abayili babengalawull bonke abantu ababechatshazelwa lolu yilo.

Ingxelo ithi konke oku kufuneka kuguquke - kufuneka sisebenze ngendlela entsba. Kufuneka sifumene izimvo kubantu nemibutho emininzi kangangoko. Kufuneka kukho umgaqo omnye noyilo esinokusebenzela ludo xa sisonke. Ngale ndlela siya kukwazi ukulawula ulwando ngeyona ndlela Iyiyo.

NAZI EZONA NGONGOMA ZLPHAMBILI KUFUNeka ZIQWALASELWE NGUMGAQO NQYILO:

- * Umgaqo kufuneka ube nokusebenza, yaye imiqathango ebalulekileyo kufuneka ibe nokuhlala ixesha elide.
- * Umgaqo kufuneka ubonelele bonke abantu - kufuneka ube nobulungisa kwabo bahlala apha nabo bazlindwendwe.
- * Abahiall kufuneka babenakho ukuthatha inxaxheba kuyilo nolawulo lomgaqo. rigale ndlela sonke siya kubanakho ukuchaza indlela emayisetyenziswe ngayo iNcam yeKapa.
- * Abantu abasebenzisa umgaqo nabalawula uyilo imihla ngemihla kufuneka benenkathalo ngabantu kuyo yonke into abayenzayo. Kufuneka benenkathalo ngemali abayichithayo.
- * Ezinye iindawo zorngacro kufuneka zibenniIcho

ukuze xa iimfuno zabantu nezendalo ziguquka, nomgaqo ube nokulungiswa ungqinelane nazo.

EKUGQIBELENI INGXELO YENZA IZINDULULO ZALO MGAQO MTSHA.

14⁻ Umgaqo kufuneka uqale ultusebenza ngokukhawuleza kangangoko, yaye Itufunelta usetyenziswe libhunga lolawulo eillilo.

tir⁻ Kufunelta senze iNcam yeKapa ibe elungileyo yabantu abahiala, ahasf-'l7 nabandwendwela kuyo.

Per Kufuneka sifumane indlela yoltukhathalela ubit We, beNcam yelcapa umhlaba, amanzi, amahlathi, lintaba nolwandle. Ngale ndlela, singazisebenzisa ukwenza ubomi bube ngcono Ruth!. Ukuba asikwenzi oko kuya kusenzela lingxaki ezizqatha. Kufuneka silyile silawule iNcam yelcapa ukuze sifumane okona kukuko kuyo eltusebenzeni nasemidlalweni yethu, ngaphandle kokutshabalalisa indalo okanye amasiko ethu.

146⁻ Ezinye iindawo kuya kufuneka zibe zilndawo ezizodwa yaye kuya kufuneka sizikhusele sizigcine bucala zodwa. Zingaba zezizodwa kwilmball zethu, iindawo esikhonzela kuzo, okanye apho indalo kufuneka iyekwe Ingaphazanyiswa ngabantu. Asinakho ukwalcha !Audit' sibase ImIlito sifuye nezilwanyana kwezil ndawo. Kodwa siya kubanakho ukuzindwendwela sizonwabele ezi

1* lindawo ezahlukeneyo zeNcam yeKapa kufuneka zisetyenziswe ngeendlela ezahlukeneyo. Isikhokelo somgaqo sibonisa indlela ezinolcuthi iindawo ezithile zisetyenziswe ngcono kwizinto ezithile kunezinye. Umzekelo, ezinye lindawo zilungele ukwakha izindlu, ezinye zilungele ukwonwaba kwabantu, kanti ezinye zilya kulungela ulcuba abantu bahambahambe kuzo bonwabele indalo.

Ingxelo ikwathi urhulumente kufuneka awise umthetho ukuze iNcam yeKapa xa kubandakanya amanzi ayo, illwandle, amahlathi nomhlaba, zikhuselwe ziphuculwe kakuhle. Ingxelo lyibiza le ndawo ngoluithi "yiCape Peninsula Heritage Area".

14 Zonke iinguqu kuyilo kufuneka zilawulwe ukuze kubekho ukulingana phakathi kweemfuno zabantu neemfuno zendalo.

Kufuneka kubekho ibhunga elinye lolawulo elilawula uyilo. Ingxelo ilibiza ngokuthi umthetho 'weCape Peninsula Heritage Area'. Eli bhunga kufuneka kwilkomiti zalo Jibe nabantu abavela kwilnkalo ezahlukeneyo, abamele bonke abemi beKapa. Eli bhunga kufuneka ligeinele abantu boNzantsi Afrika incam yeKapa.

11111 'mail kufuneka iphume kulawulo loluntu kumgangatho worhuluMente wesizwe, wengqingi nowesithill, nakuluntu oluzimeleyo. Le mall lya kuba yeyokuxhasa umsebenzi webhunga lolawulo. Ibhunga kufuneka libenakho ukungenisa imall ngokushishina, ukuze likwazi ukuqesha abantu abaya kukhathalela ihcam yeKapa.

Imo' Le umthetho "weCape Peninsula Heritage Area kufuneka ibe nawo amandla okusebenzisa umgalo, kwakuba kugqitylwe ngawo. Kufuneka ibe nakho ukulawula uphuculo kwiricam yeKapa ngeyona ndlela.

Wakuba ugqityiwe umgago, kuya kubaluleka ukuwuxhasa. Uya kuba ungowethu sonke yaye sonke siya kuxbamlala kuwo. IBhunga kufuneka liseke linjongo zetbutyana nezexesba elide noyilo, ezilya kuqwalaselw rhogo. rigale ndlela siya kuyibona Inkqubela: m ekhoyo.

versicillende planne en daarom het geen planne „ hoof lik uitgewerk nie. Verder is nie al die mense in ic,iapse Skiereiland se menings gevra nie, en die planners was riele werklik verantwoordelik teenoor al die mense wat deur hierdie planne geraak is nie.

Volgens die verslag moet hierdie situasie verander ons moet op 'n nuwe manier begin werk. Ons moet soveel as moontlik idees kry van soveel mense en organisasies as moontlik. Daar moet een groot oorloepelende beleid en plan wees waarnatoe ons kan werk. So kan ons die groei die effektiese beheer.

HIER VOLG DIE HO OFSAIM WAT DIE NUWE BELEID EN PLAN MOET AANSPREEK:

- * Die beleid moet werkbaar wees, en die belangrikste beginsels moet vir 'n lang tyd nog geldig bly.
- * Die beleid moet in almal se beste belang wees dit moet regverdig wees teenoor inwoners, rowel as besoekers.
- * Dit moet 'n regverdige beleid wees wat vir almal werk vir grond-besitters, winkeliers, beleggers, werkende mense, en vir diegene wat die Skiereiland vir sport of ontspanning gebruik.

- * bade van die publiek moet kan deelneem aan die beplanning en bestuur van die beleid. Sodoende sal ons almal 'n seggenskap he in die gebruik van die Kaapse Skiereiland.

Die mense wat die beleid uitvoer en verantwoordelik is vir die daaglikse bestuur van die plan, moet geheel en al verantwoordelik wees teenoor die publiek in hul optrede. Flulle moet ook verantwoording doen vir die geld wat hulle spandeer.

- * Sommige dele van die beleid moet kan verander die beleid moet aanpasbaar wees, sodat die beleid aangepas kan word soos die behoeftes van mense en die omgewing verander.

DIE VERSLAG SLUIT AF MET VOORSTELLE VTR HIERDIE NUWE BELEID.

Die beleid moet so you moontlik toegepas begin word en 'n gepasde owerheid moet die beleid uitvoer.

Ons moet die Kaapse Skiereiland 'n vele plek maak vir die mense wat bier woon, werk en Ruler.

- 14- Ons moet 'n manier vind om te sorg vir die prag van die Kaapse Skiereiland - die grond, die water, die borne, die berge en die see. So kan ons die omgewing gebruik om ons lewens beter te maak. As ons dit nie doen nie, kan ons nog vir onself groot probleme veroorsaak. Ons moet die Kaapse Skiereiland beplan en bestuur sodat ons die meeste nut daaruit kan kry in ons werk en

ontspanning, sonder om die natuurlike en kulturele omgewing te vernietig.

Sommige areas sal spesiale areas wees wat ons sal moet beskerm en eenkant hou. Dis miskien plekke uit ons geskiedenis, plekke waar ons aanbid, of plekke waar die natuur alleen gelos moet word, sonder die inmenging van mense. In hierdie plekke sal ons nie kan huise bou, vure maak of diere aanhou nie. Maar ons sal hierdie plekke kan besoek en geniet.

Verskillende areas In die Kaapse Skiereiland behoort verskillend gebruik te word. Die beleid se riglyne wys uit hoe sommige areas meer geskik is vir 'n sekere doel as ander. Sommige areas, byvoorbeeld, is meer geskik vir huise, ander areas weer vir pieltreks, terwyl ander areas die gesitiltste is vir mense wat wil wandel en die natuur geniet.

Die verslag se ook dat die regering 'n wet moet aanneem wat sê dat die hele Kaapse Skiereiland dit sluit in die water, oseaan, bome en grond - behoorlik beskerm en verbeter word. Die verslag noem hierdie area die "Cape Peninsula Heritage Area".

1.1.1 Enige veranderinge aan die plan moet fyn beheer word sodat daar 'n balans is tussen die mens se behoeftes en die natuur s'n.

'n Enkele owerheid behoort die bestuur van die program te beheer. Die verslag noem dit die "Cape Peninsula **Heritage-Area** Owerheid". Hierdie

owerheid moet mense uit verskillende sektore op hul kornitees toelaat sodat al die mense van Kaapstad verteenwoordig word. Die owerheid moet namens die mense van Suid-Afrika as opsigter van die Kaapse Skiereiland optree.

Pit Geld behoort van die publieke sektor te kom in die vorm van die nasionale, provinsiale en plaaslike regerings, sowel as van die sakewereld (privaat sektor). Hierdie geld behoort vir die werk van hierdie owerheid te wees. Die Cape Peninsula Heritage-Area Owerheid behoort ook, soos 'n besigheid, geld te kan maak, sodat hulle mense kan werk gee om te help sorg vir die Kaapse Skiereiland.

Hierdie Cape Peninsula Heritage-Area Owerheid behoort ook genoeg mag te hê om die beleid uit te voer, nadat almal daarvoor saarngestem het. Dit behoort ontwikkeling in die Kaapse Skiereiland op die beste moontlike manier te beheer.

Wanneer die beleid gefinaliseer is, is dit belangrik om dit te ondersteun. Dit sal aan ons almal behoort en ons sal almal daarby betrokke. Die Owerheid moet kort- en langtermyn doelstellings en planne hê wat gereeld hersien kan word. So kan ons sien watter vooruitgang plaasvind.

