

Public Comment: Tokai Cecilia Draft Implementation Plan (TCDIP)

Dear Wendy and Howard ...

Thank you for affording us the opportunity to comment on the [Tokai Cecilia Draft Implementation Plan](#) (TCDIP) and its [Annexure](#) released on 12 April 2022. Your efforts in bringing the Tokai-Cecilia Management Framework Review Process to Phase 3, i.e. [Outcomes of issues, concerns and proposals](#) and the issue of a Draft Revised Framework for public comment (as per your presentation of 3 June 2021) are greatly appreciated.

SANParks' mandate is therefore multi-objective (and these objectives may sometimes be in conflict) but it clearly prioritises 'biodiversity custodianship' as the primary purpose. The requirements of biodiversity conservation may thus not be put at risk through the activities of other, secondary, objectives.

[A Framework for Developing and Implementing Management Plans for South African National Parks](#)

Overview

I The Draft Implementation Plan

I am also grateful that, in your email of 23 May 2022, you convey the decision of SANParks Managing Executives Mr Property Mokoena and Dr Luthando Dziba "...to consider the current draft as an 'interim' draft for public comment" subject to "...another round of drafting and commenting".

Of course, I have no idea why Messrs Mokoena and Dziba felt such a further round of drafting and comment to be necessary, but I suspect that they saw grave shortcomings in the current TCDIP and Annexure. I do too, in the sense that, while **Annexure 1** provides a comprehensive listing of stakeholder recommendations and provides SANParks' feedback on their suitability (or otherwise) for implementation in terms of the [Table Mountain National Park: Park Management Plan 2005-2015](#) (TMNP PMP), the draft implementation plan **includes** Project and Programme items deemed "not feasible" or "impractical for implementation". **It cannot, therefore, be considered a feasible implementation plan.** Nor can it be considered a satisfactory outcome to **Phase 2: Focused workshops for issues, concerns and proposals.**

I attended the Biodiversity Management, Fire Management and History and Cultural Heritage Working Group meetings and, at all meetings, a SANParks employee was on

hand to advise us of the feasibility or otherwise of our recommendations. Their advice, as members of the working groups, was excellent and greatly appreciated. One can only surmise how we ended up with a TCDIP so riddled with impractical or, frankly, illegal recommendations.

That said, *any* plan containing elements deemed acceptable on the one hand and unacceptable on the other is inherently self-contradictory and, even should elements considered "not feasible" or "impractical for implementation" be assigned a lesser category, in this instance "Projects", they render the plan illogical or, more bluntly, useless. Put succinctly, **a plan that contradicts itself destroys itself.**

II The Process

The objectives of SANParks TMNP's public-participation model or stakeholder-engagement process are listed at **Section 4: Consultation** on page 26 of the TMNP PMP. They are to:

- Create a channel for the accurate and timely dissemination of information to interested and affected stakeholders;
- Create the opportunity for communication between SANParks and the public;
- Promote opportunities for the building of understanding between different parties;
- *Provide the opportunity for stakeholders to give meaningful input [my italics] into the decision-making processes that drive the development of the Park Management Plan.*

Consultation is not an arbitrary term. It is internationally recognised as the second rung on four-rung ladder of participation including **Inform** (provide opportunity for access to information), **Consult** (provide opportunity for input), **Involve** (provide opportunity for dialogue and interaction) and **Collaborate** (provide opportunity for partnership). [See also IAP2 Spectrum of Public Participation.pdf attached]

IAP2 Spectrum of Public Participation



IAP2's Spectrum of Public Participation was designed to assist with the selection of the level of participation that defines the public's role in any public participation process. The Spectrum is used internationally, and it is found in public participation plans around the world.

		INCREASING IMPACT ON THE DECISION				
		INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL		To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
	PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

In terms of legislation (the **National Environmental Management Act, Act 107 of 1998**, **National Environmental Management: Protected Areas Act, Act 57 of 2003**, **World Heritage Convention Act, Act 49 of 1999** and the **National Heritage Resources Act, Act 25 of 1999**), SANParks is obliged to *consult* with the public and provide it the opportunity to give *meaningful input* into SANParks' decision-making processes in terms of the TMNP PMP (see also [Stakeholder Participation in Developing Park Management Plans](#) and [Public Participation Guide: Selecting the Right Level of Public Participation](#)).

Many parties to this process seem incapable of understanding or abiding by the restrictions imposed on them by consultation. Moreover, SANParks' occasional ill-defined use of the words "partnership" and "collaboration" have done little to dissuade members of the public from believing that they have "a right" to see their recommendations implemented. They do not.

Because a consultative process ultimately vests the power to make decisions in SANParks, it is not a given that meaningful input from the public *must* drive SANParks' decisions.

Nor is it a given that all input from the public should be considered *meaningful*.

Much of it, in the context of the Tokai-Cecilia Management Framework Review Process, the TMNP PMP, and SANParks' eschewal of them in **Annexure 1**, may be considered *meaningless*. And yet SANParks has seen fit to include many of these "meaningless" recommendations into the TCDIP, rendering *it* meaningless or, at best, contradictory and insubstantial.

In so doing, SANParks has negated any benefits it may have gained from the first three bulleted points from the TMNP PMP above. It has clogged its channel of communication to interested and affected stakeholders, obfuscated communication between SANParks and the public and "blown out of the water" any nascent opportunities for building understanding between different parties.

It behoves SANParks to "grow a pair" and, when necessary, advise stakeholders – unambiguously – that their recommendations reach far beyond consultation and, as such, are not suitable for consideration.

III The Public and its Opinion

In neoliberal consumer societies increasingly dominated by income disparity and social media, financial wealth has displaced knowledge as a measure of power, value and worth. This is especially important in public-participation processes where wealth dictates access to (and manipulation of) broadcast media at every level. It leads our societies to believe that she who shouts loudest wins, resulting in an anti-intellectual thuggery antithetical to the principles of the environmental science and conservation biology championed by SANParks.

During this process (and reflected in the **Annexure** to the TCDIP) we have seen the undue influence of a self-professed community environmental and safety organisation that:

- exercises [undue influence over local media](#)
- uses ["lawfare" or litigation](#) to sabotage SANParks' conservation mandate
- abuses [social issues](#) to perpetuate a ["green apartheid"](#) and ["fear of crime"](#) rhetoric
- jeopardises our [World Heritage Status](#) by sending [baseless complaints to the World Heritage Centre](#); and...
- seeks to [oust SANParks from TMNP in order to privatise and develop our most precious natural asset](#).

That its office bearers and ordinary members dominated select Working Groups is evidenced by **most of the recommendations made to the TCMF Review Process and rejected by SANParks emanating from the Health and Wellbeing and Facilities Working Groups**. I believe that, in the 21st Century, it would be a good idea for us all to remind ourselves of necessary and desirable constraints to civic discourse so that we are able to avoid exercises such as this one descending into unnecessary and eminently avoidable chaos.

It must be emphasised here that all members of the public are welcome to submit recommendations to a consultative public-participation process. However, where the recommendations of populist lobbies are stated, in **Annexure 1**, as being "not feasible" or "impractical for implementation" but are included in the Draft Implementation Plan, other stakeholders (comprising private individuals and community organisations) cannot be accused of alarmism for believing that the interests of such populists are a) being favoured, or b) being treated with undeserved courtesy.

SANParks is our national conservation authority and must show itself to be impartial. By incorporating into the TCDIP the oft-daft recommendations of stakeholders hell bent on undermining its authority, it runs the risk of alienating many of those supporting its clearly stated conservation mandate.

In this regard, I align myself fully and unreservedly with the [letter submitted to you by Professor Tony Rebelo and Dr Alanna Rebelo on 30 May 2022](#).

Comments on the TCDIP

Each comment corresponds to the relevant section / project / programme in the TCDIP.

2. Introduction

Phase 3 of this stakeholder and public engagement process considered all the proposals received from the stakeholders during the focused workshops and consolidated the suggestions into meaningful projects and programmes of action

for implementation. This report represents the Draft Implementation Plan for the management of the Tokai and Cecilia areas for public comment.

Comment 1: See my comments at **I The Draft Interim Plan** above. I argue that "meaningful projects and programmes of action for implementation" cannot include recommendations considered by SANParks to be "not feasible" and/or "impractical for implementation".

3. Process to developing the Draft Implementation Plan

Biodiversity Management Working Group, Communications Working Group, Cultural Heritage Management Working Group, Facilities Working Group, Fire Management Working Group, Human Well Being Working Group, and Safety & Security Working Group.

Comment 2: The misnaming of the **History and Cultural Heritage** and the **Health and Well-being** Working Groups are not irrelevant. The first has unilaterally been renamed the Cultural Heritage Management Working Group, which is not acceptable. Heritage, subject to legislation, is underpinned by history and to lose sight of this is to open "heritage" to myriad specious interpretations – as has been done in the TCDIP.

Comment 3: Health and well-being or human wellbeing, [as is pointed out in this article](#), cannot be taken seriously as an alternative to the original name given the group, i.e. Recreation.

[T]hese proposals have been reviewed by SANParks in terms of their suitability and feasibility for implementation¹ in the Tokai Cecilia areas in collaboration with its stakeholders and partners as follows:

- ✓ Proposals well suited for implementation
- ✓✓ Proposals suited for implementation with minor amendment
- Proposals not feasible and/or are impractical for implementation

Of the 330 proposals, 94% are accommodated in the draft Implementation Plan. Of the 94%, approximately 35% are fully aligned to the draft IP, and 65% of the proposals are aligned with minor amendment. Only 6% of the proposals were not considered for inclusion due to their being unfeasible or impractical for implementation.

Comment 4: I quote the above for two reasons. First, to draw to your attention the following quotation from the [Cape Argus of 25 May 2022](#):

Parkscape founder Nicky Schmidt said: "The Draft Plan as it currently exists has reduced hundreds of hours of stakeholders' work, and rich and nuanced proposals, to mere one-line items to which a double tick, single tick and dash methodology has been applied."

"It barely begins to do justice to stakeholders' input, more so given some proposals (which represent the voices of thousands of people) have been rejected out of hand with no legally valid or viable explanation."

In light of **III The Public and its Opinion** above, wherein I point to SANParks' perceived appeasement of populist lobbies, such comments as that quoted here should demonstrate, amply, that such populist groups will never be satisfied. Had SANParks dedicated its time to developing a feasible and workable Draft Implementation Plan excluding recommendations already excluded in **Annexure 1**, it might have had time to point Ms Schmidt to the TMNP PMP and / or the **National Environmental Management: Protected Areas Act, Act 57 of 2003** and its lists and regulations.

Secondly, while it might be true that "94% of recommendations are accommodated in the draft Implementation Plan", I'd suggest the purpose of their accommodation is more important and deserving of recognition and comment than the statistic. That the recommendations of seven working groups are recast into seven "broad themes" readies one for the cross-pollination and mangling of several working groups' recommendations. More below ...

4. Alignment of Draft Implementation Plan to the SANParks / TMNP planning system

Comment 5: Programmes are defined as "[p]roposals that align with, or can be accommodated in, existing Park operational programmes *within the Park Management Plan*."

If this were not the case, the TMNP PMP would be meaningless.

Projects are defined otherwise; as requiring additional budgets, acceptance by SANParks, land or site-use change, implementation, and incorporation into SANParks operations.

The above definition of Projects omits mention of their need to align and comply with the TMNP PMP. A more cynical mind than mine might assume that Projects are defined this way to allow for their inclusion in the Draft Implementation Plan. However, such an omission does not preclude them being subject to the TMNP PMP. My lack of cynicism is also rewarded with **Figure 1: Draft Implementation Plan Projects and Programmes** [Figure 1 Draft Implementation Plan Projects and Programmes.jpg attached], which shows both Programmes and Projects to be subject to the TMNP PMP.

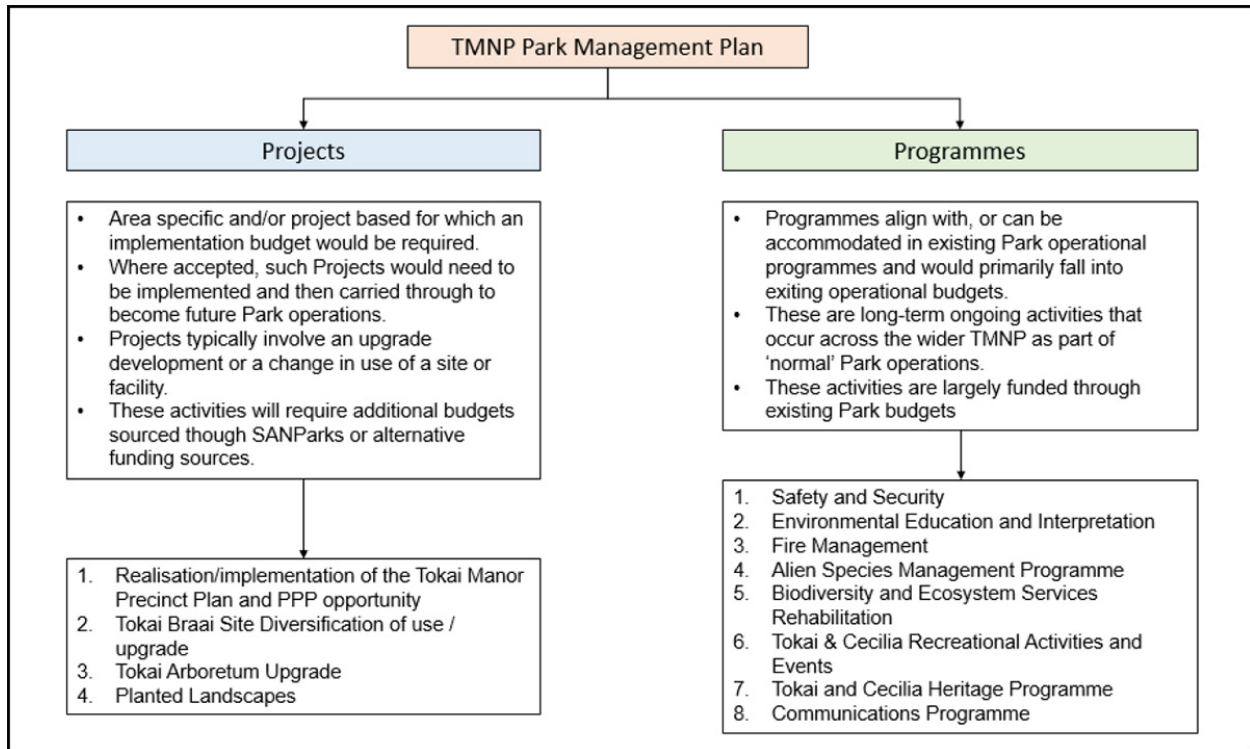


Figure 1 Draft Implementation Plan Projects and Programmes

5. Draft Implementation Plan

The WGs put forward a wide range and variety of proposals of which many are similar and often overlapping. To streamline these into an IP that SANParks and stakeholders can work with and implement, the proposals have been grouped and are presented in the draft IP in a summary table format.

Comment 6: This makes sense. However, as stated in **Comment 4** above, I'd still be mindful of the assumption relating to **Annexure 1**: "That the recommendations of seven working groups are recast into seven "broad themes" readyies one for the cross-pollination and mangling of several working groups' recommendations."

6. Draft Implementation Plan – Projects

6.1 Realisation / implementation of the Tokai Manor Precinct Plan and PPP opportunity

Additional information for consideration in the precinct area includes proposals for First Nations / indigenous cultural opportunities, heritage interpretation.

Comment 7: It is evident that these proposals were submitted by the Health and Well-being and Facilities Working Groups which are as ill-qualified to consider Heritage issues as I am to conduct Mindfulness sessions, Pilates classes or suitable facilities in which to hold them. History and Cultural Heritage fell within the purview of the History and Cultural Heritage Working Group (HCHWG), which made no such recommendation. At 2.6. **Proposal : Health and Wellbeing Working Group (HWWG)** in the [Summary](#)

[of Proposals by Working Group received during Phase 2 of the Tokai Cecilia Management Framework Review Process](#) (21 February 2022) the HWWG recommendation relating to Heritage is summarised thus:

The HWWG proposal provides for greater social connection through the establishment of First Nation Indigenous Cultural Heritage Centre, developing places of healing for traumatised youth, adults, and a Memorial as a representation against gender-based violence.

The Tokai Manor Precinct and the Arboretum are **Grade 2 (Provincial) Heritage sites** and, as such, are subject to the **National Heritage Resources Act, Act 25 of 1999**. As such, SANParks is obligated to maintain them in terms of the NHRA, precluding their uses for the purposes recommended above. **Such recommendations, inimical to a National Park, should be rejected.**

6.1.3 First Nations cultural site

Comment 8: This strategic action, containing as its Milestones "Investigate site for placement First Nations cultural site linked to the Tokai Precinct" and "Planning and establishment of First Nations cultural site linked to the Tokai Manor Precinct" arises from the following recommendations by the Health and Wellness and Facilities Working Groups:

046 Cecilia Identify and create a sacred site for ceremonies and worship for First Nations people.

047 Upper Tokai Create sacred site(s) for worship and ceremonies for First Nations people.

048 Upper Tokai Corporate picnic area re-opened with link to Arboretum and Manor House – possible site for KhoiSan cultural centre.

049 Manor House & Arboretum Khoi San overnight cultural “skerm” location, arena and cultural celebrations to be developed in the old corporate picnic site

050 Manor House & Arboretum Khoi San Cultural centre at old corporate picnic site, as part an array of family & tourist educational visit offerings. Food, beverage & craft trade to make self-funding

189 Lower Tokai Create and maintain heritage and cultural programmes, particularly as pertains to First Nations People, including art installations

In Smith A 2022 – [First People: The Lost History of the Khoisan](#), we read:

It might be argued that the picture we have of hunter-gathers from 20th-Century social anthropology is a modern vision, and it might have been somewhat different 2 000 years ago, when the first herders arrived in southern Africa. I would suggest, however, not only that it is the best we have but that the changes were probably minimal, at least from a social perspective of how people dealt with each other. There is no way that archaeology, even at its best, can offer such detail. For the Khoekhoen, things are even more difficult, because their society was ripped apart 300 years ago, and the observations from that time are limited and seen through the colonial prism.

Any lost history of the Khoekhoen must be viewed through the "colonial prism", **even by today's descendants of our First People** – who, in the Cape, were subject to genocide, slavery, indoctrination and a loss of culture by succeeding colonial occupations. It may be considered a sad fact, but we are all South Africans today. While we can do much to acknowledge our First People, the above recommendations suggest a [Saartjie Baartman](#) Resurrection Tour at Tokai, a cultural circus replete with the scent of caged animals, tawdry performative acts and the sad sawdust of the Big Top, produced and managed by descendants of those so ably described in Van Sittert L 2003 - [The bourgeois eye aloft - Table Mountain in the Anglo urban middle class imagination c1891-1952](#).

Any notion of what and who constitutes our First People demands intense historical analysis, such as that envisaged in **7.7 Tokai and Cecilia Heritage Programme** (in particular, Strategic Actions **7.7.1 Manage heritage areas in accordance with heritage guidelines and recommendation** and **7.7.2 Undertake new and continue with current heritage studies**). Any project pre-empting the findings of such studies risks insulting the lost history of our First People and should be considered only once such a history is recovered at Tokai.

6.3. Tokai Arboretum Upgrade

Comment 9: Planting at The Arboretum commenced in 1886.

6.3.1: Open Lister's Place

serve basic 'refreshments'

Comment 10: Both the use of Lister's Place as a source of "information and interpretation on the Arboretum [or, for that matter, the history of forestry at Tokai] and to serve basic 'refreshments'" is subject to the "preparation of a management and landscape plan", the Funding Source of which is **Project Funding** and **Fund Raising**. Lacking definition of **Project Funding**, one would assume that some of it would come from insurance monies claimed by SANParks following the building's destruction in 2015. It is proposed that the rest would be subject to "fundraising". It's regrettable and perhaps illegal that an amenity essential to the public's enjoyment and appreciation of the natural and cultural heritage of The Arboretum, a Provincial Heritage Site maintained by SANParks, should not be funded by SANParks' operational budget. Perhaps **Project Funding** requires clarification.

6.4 Planted Landscapes

Comment 11: Projects that do not fall within SANParks' operational responsibilities (the Tokai Manor Precinct and Picnic Area and fire-proofing the Arboretum do) or have not yet been beaten into compliance with the TMNP PMP and legislation are dependent on community partnerships and fundraising. This is especially true of **Planted Landscapes**. Moreover, this project is the only one falling into SANParks *corporate* (together with *Park Operations*, *Park Planning* and *Partnerships*) area of **Responsibility**. What is meant by and what are the implications of this?

Comment 12

Trees and associated landscapes are valued by many stakeholders and provide a range of values and benefits, e.g. scenic, cultural, recreational shade.

It is irrelevant, bar as an informant, that planted landscapes are "valued by many stakeholders" or "provide a range of values and benefits" if they do not comply with the TMNP PMP, SANParks' mandate and existing national legislation and international obligations.

Treed areas include both naturally occurring indigenous trees ...

See Poulsen ZC 2013 – [Changes in distribution of indigenous forest in Table Mountain National Park from 1880-2012](#)

6.4.1 Manage historical / heritage trees and plantings in line with heritage requirements

Comment 13: This strategic action must comply with the **National Heritage Resources Act, Act 25 of 1999**.

6.4.2 Identify sites within and adjacent to the Park where planted trees can be retained or introduced

Comment 14: The **Milestones**, *Investigate extension of the plantations Exit Lease* and *Identify and expand tree planting in other areas of the Park* go against "the original national government decision and the subsequent Tokai Cecilia 20 year 'exit' lease" referred to in the paragraph introducing **6.4 Planted Landscapes**.

Moreover, **Planted Landscapes** are regarded as a **Project**. In other words, it falls outside the criteria of a **Programme** in that it does not "align with" and **cannot** "be accommodated in existing Park operational programmes, within the Park Management Plan" (p7). However, as pointed out in **Comment 5** above, this "does not preclude [it] being subject to the TMNP PMP". [See also Figure 1 Draft Implementation Plan Projects and Programmes.jpg attached where Programmes and Projects are shown to be governed by the TMNP PMP.]

Comment 15: The TMNP PMP articulates the insuperable hurdles faced by any attempt to retain a fragmented, non-working plantation comprising alien vegetation in a National Park. Absent changes to several key pieces of legislation or a special dispensation granted by the Minister and agreed to by various state entities and the World Heritage Committee, this project is doomed to fail. Planted landscapes fly in the face not only of national legislation but SANParks' mandate and international treaty obligations. It is extremely doubtful that any court, using an extremely limited "public interest" argument, would upend such legislation.

I'd therefore contend that, in terms of the TCDIP, the **Planted Landscapes** project contradicts or violates that which SANParks views as practical, suitable or feasible for implementation. As such, it has no place in the Draft Implementation Plan.

Comment 16: To further clarify the above, SANParks has responded directly and unambiguously to recommendations made by the various Working Groups with regard to **Planted Landscapes**. Recommendations **153, 214, 215, 218, 220-222, 233-239** and **295-298** are, in the **Annexure**, described by SANParks as "proposals not feasible and/or impractical for implementation".

Among the recommendations thrown out by SANParks in [Annexure 1](#) are:

- 153 Lower Tokai:** Working with SANParks and conservationists, protect and preserve critically endangered Cape Flats Sand Fynbos contained within the existing central and northern sections of the park, while ensuring suitable density and height restrictions.
- 218 Middle and Upper Tokai:** Dogs permitted up to Level 1.5 – all dogs to be leashed at all times. Access to Level 1.5 via Tokai Section Office. Baboon monitors will be necessary.
- 220 Cecilia:** Create turning circle for horse boxes with place to offload and upload horses and riders
- 221 Tokai:** Cable way to Constantiaberg mast per plans ex 2006 (subject to economic feasibility study). Additional parking would be required.
- 233 Middle Tokai:** Replant hardwood grove around the Thatch Cottage
- 234 Upper Tokai:** Follow the Shout 4 Shade Proposal for shade provision viz. Formal planting between Tokai Arboretum and old gum stand and along the boundary with the wine farms
- 235 Upper Tokai:** Replant the old gum grove area (Fairie Glen) with mixed species (non-invasive introduced and Afrotemperate)
- 236 Upper Tokai:** Extend Arboretum by minimum of 30m to south of stream, extended west to level 1 and north to include corporate picnic site link to old gum grove area (Fairie Glen via introduced species (non-invasive or 'sterile pines') to create permanent shade.
- 237 Tokai & Cecilia:** Retain stands of existing pines as a shade canopy between which tall-canopied local species and non-invasive exotics can be grown on a phased transition basis. Transition planting from pines to local species to commence as a matter of priority in current plantation by creating 10, 15 and 30m clearings between pines planted with seedlings of Afrotemperate and introduced non-invasive species.
- 238 Lower Tokai:** Transitional tree planting, with non-invasive trees
- 239 Tokai & Cecilia:** Retain existing plantation and allow thinning to allow Afrotemperate forest to expand naturally into these "nursery" areas
- 296 Lower Tokai:** Maintain fynbos vegetation at a height of between 1.2 - 1.4 meters
- 297 Lower Tokai:** To improve security in fynbos areas, allow for 5 year burning of fynbos

Note: It is out of SANParks' rejection of recommendations **234, 235, 236, 237, 238** and **239** above that **Project 6.4.2** arises. SANParks views it as either not feasible or practical for implementation. Yet, contradictorily, it retains it as a "project". This is illogical and misleading. To preclude continuing ambiguity and to prevent it leading shaded-recreation lobby groups up the

garden path, SANParks must forego this project altogether and, given that it rejects several recommended "planted landscapes" as well as any fynbos "bio-engineering", it should stipulate where it foresees retaining heritage trees or planting indigenous shade trees (see **6.4.1 Manage historical / heritage trees and plantings in line with heritage requirements**).

7. Draft Implementation Plan - Programmes

7.1 Safety and Security Programme

Comment 17: The [Crime](#) page of the [Friends of Tokai Park](#) website articulates my views with regard to crime and how to contain or defeat it at TMNP. We thank SANParks, its public and private partners, community organisations, neighbourhood watches, volunteers and individuals for their practical commitment to combating crime effectively in the Park.

7.2 Environmental Education & Interpretation

Cultural heritage extends from the First Nations people though to the modern era.

Comment 18: Cultural heritage must be underpinned by historical fact. In terms of our First People, the Princess Vlei / Elephant's Eye legend introduces a blurring of recent folklore and local history.

Princess Vlei (formerly Diepe Vlei) was renamed after Victoria and Princess Roads in Plumstead (1807, after a London suburb) marking Victoria Estate in neighbouring Diep River / Southfield. Both Victoria (1819-1901), Queen of England and Victoria (1840-1904), Princess Royal, Empress of Germany and Queen of Prussia, died at the turn of the 19th Century and the City named the roads in their memory [see [City-of-Cape-Town-and-Environs-1930-Surveyor-General-s-Office-Princess-Vlei-Extract.jpg](#) attached].



Figure 2 City of Cape Town and Environs 1930: Surveyor General's Office – Princess Vlei Extract

Khoekhoe pastoralists at the Cape had no concept of royalty (Sonqua hunter-gatherers comprised egalitarian clans) and leadership titles ("*kaptein*") were imposed on individuals by the Dutch, who presented such unelected leaders with a staff (see Smith A 2022 – [First People: The Lost History of the Khoisan](#)).

The notion of a Khoekhoe "princess" linking Princess Vlei and Elephant's Eye Cave (more correctly, Prinskasteel Cave), is therefore tragically ironic in that it was fostered by colonial history and, in 1952, was presented by Dulcie Howes as a ballet, *Vlei Legend*, to commemorate the 300th anniversary of Van Riebeeck's landing at the Cape. Needless to say, the opera featured only white performers [see Dulcie-Howies-ballet-Vlei-Legend-1952.jpg attached].

Such manipulation of the beliefs of descendants of our First People continues and can now be seen in the manipulation of the [Tokai Cecilia Management Review Process](#) by people with political or other vested interests (see **III The Public and its Opinion** above).



Figure 3 Dulcie Howes' ballet *Vlei Legend* (Van Riebeeck Tercentenary Festival 1952)

We can, however, assume that the "Princess Legend" has its genesis in the poverty stricken area beyond Wynberg during the early part of the 20th Century and was fostered by colonial oppression. At the time, Princess Vlei was the only area providing a measure of recreation to Capetonians forced to live there.

7.2.2 Establish active / live interpretation

Comment 19: I agree with the three **Milestones** under this section, subject to the following:

1. Interpretation trails should not be established in core fynbos conservation areas

2. A Heritage Walk is best suited to the Tokai Manor Precinct and the Arboretum
3. A medicinal garden in keeping with farmstead gardens is well suited to the Tokai Manor Precinct if in keeping with the **National Heritage Resources Act, Act 25 of 1999**
4. The area surrounding the observation deck should be developed as an area of environmental / cultural education
5. The existing [Restoration Trail](#), not subject to a 2-3 year time lag is an invaluable fynbos interpretation trail and requires an upgrade
6. SANParks should detail its vision of such trails

7.3 Fire Management Programme

Comment 20: Any Environmental Education or Awareness campaign should **emphasise the benefits of fire** to the restoration and conservation of biodiversity in the Fynbos Biome. This point should either be incorporated into **7.2 Environmental Education & Interpretation** above or added to **7.3 Fire Management Programme** as a Strategic Action.

7.5 Biodiversity and Ecosystem Services Rehabilitation

The Tokai and Cecilia plantation areas and MTO 'exit' lease were Assigned to SANParks in 2005 by the then DWAF with the express purpose of "...the planned rehabilitation of the natural environment and the protection of its biodiversity."

Comment 21: This is in keeping with SANParks core conservation mandate and speaks to the impracticality of Project **6.4 Planted Landscapes** above. The TMNP PMP states, at **5.4 Operating values** (p 30), SANParks' mandated values with regard to biodiversity, ecosystem services, restoration and conservation. At page 19, it states "*...the mandate of SANParks is biodiversity management*" and, at p66, it is also quite clear about its mandate:

10.1.1 Land consolidation programme

The purpose of this programme is to consolidate the TMNP in accordance with the original government mandate by incorporating conservation worthy land through purchase or other means by following the SANParks land acquisition framework.

At **10.2 Biodiversity management** on page 70, the TMNP PMP states unequivocally:

Biodiversity management is the core mandate of Table Mountain National Park.

And at page 146, it:

Recognises that the **mandate** of SANParks is to conserve biodiversity and heritage resources of national and international significance, which vary across the landscape in both time and space, not only in terms of the NEM:PAA but also the National Heritage Resources Act (NHRA);

A reading of the TMNP PMP underlines that the operating values set out on page 30 of the TMNP PMP underpin all programmes, and therefore all Environmental Education in the Park and should not need to be restated here. However, as with Programmes 7.2 and 7.3 above, such values, as well as an understanding of processes undermining nature, e.g. land-use change, biodiversity loss, pollution, climate change, etc. need to be more forcefully incorporated into any Environmental Education programmes.

7.6.3 Improve visitor and family experience in the wider Tokai Manor precinct

Expand commercial offering e.g. commercial horse riding

Comment 22: Such improvements, expansions or provisions should be subject to EIAs open to public scrutiny.

7.7 Tokai and Cecilia Heritage Programme

7.7.3 Social Memorial

Comment 24: It seems the building of a "social memorial" is *fait accompli*. If it is, I'd like to know about it. By all accounts it would seem a memorial to victims or survivors of gender-based violence is planned. If it is, and as somebody deeply affected by the suffering of people subject to such violence, I am not in favour of it as it merely serves to perpetuate a "fear-of-crime rhetoric" (see **III The Public and its Opinion** above).

Sadly, many people have died in our Park (and will continue to do so through all manner of means), but we have not erected memorials to them. I think here of Working on Fire's Colonel Hendrik "Bees" Marais, who died at Cape Point fighting a wildfire. I doubt many have visited the spot where his helicopter went down. There is no memorial there to mark the spot or eulogise the memory of wildland firefighters, but it is a beautiful part of the Park and, when visiting the site, one cannot but reflect on the dangers each of us faces on a daily basis.

The rape and murder of a young girl at Lower Tokai Park has been abused for political purposes for far too long. But perhaps something constructive should come of her needless suffering and death. Perhaps residents now "moved" to erect a memorial in her memory would serve our greater community far better by funding educational programmes or refuges in her name (I think here of the [Saartjie Baartman Centre for Women and Children](#))? I am not sure, but has this option even been put to the public?

A Note on Cultural Landscapes

The subject of "cultural landscapes", a contested concept, was keenly debated by the History and Cultural Heritage Working Group and, as it relates to **7.7 Tokai and Cecilia Heritage Programme**, I feel I should comment on the topic in this submission as it might, given a second round of drafting and comments, rear its head again.

In **Annexure 1** of the TCDIP the concept of a "cultural landscape" receives only one mention, in recommendation **258**. The recommendation, relating to the Tokai Manor House concession and made by the Health and Wellbeing Working Group, reads:

Maintain and enhance the significances of the core Tokai Manor House werf within its **overall cultural landscape context**, recognising its linkages to different areas, functions and interventions over time, including grazing lands, vineyards, plantations and arboretum, orchards, vegetable gardens and 'waterleidings', as well as significant historical routes, avenues, axes and settings.

This recommendation is redundant in that the recommendations of the [History and Cultural Heritage Working Group](#) deal with these issues, with minor amendments, at length. Cultural landscapes are defined by the World Heritage Centre (see World Heritage Centre 2021 – [Operational Guidelines for the Implementation of the World Heritage Convention](#) Chapter II.A 47-47ter).

[They] are cultural properties and represent the "combined works of nature and of man" designated in Article 1 of the Convention. They are illustrative of the evolution of human society and settlement over time, under the influence of the physical constraints and/or opportunities presented by their natural environment and of successive social, economic and cultural forces, both external and internal. They should be selected on the basis both of their Outstanding Universal Value and of their representativity in terms of a clearly defined geo-cultural region. They should be selected also for their capacity to illustrate the essential and distinct cultural elements of such regions.

See also Mitchell N et al 2009 – [World Cultural Heritage A Handbook for Conservation and Management](#).

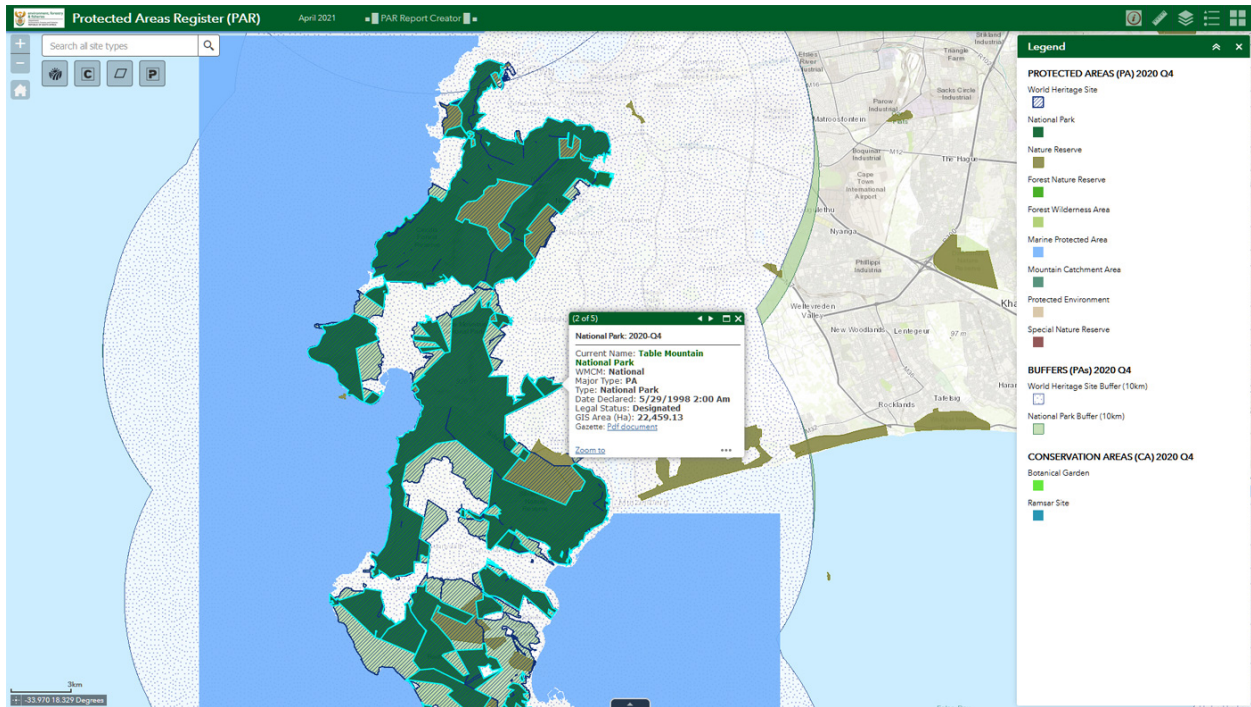
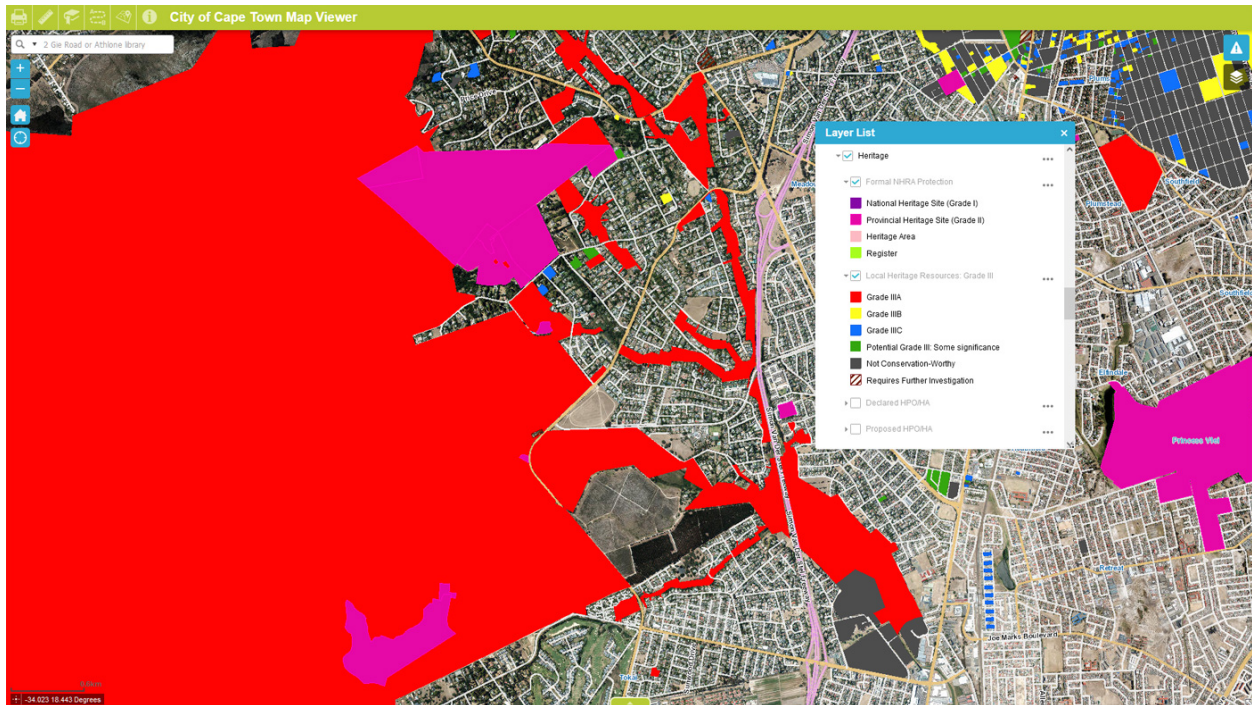


Figure 4 DEFF Protected Areas Register 2020 National Park

The Tokai Manor Precinct does not itself, and in the context of Tokai Park and TMNP (a Protected Area in terms of the **National Environmental Management: Protected Areas Act, Act 57 of 2003**), constitute a cultural landscape [see DEFF-Protected-Areas-Register-2020-National-Park.jpg attached]. TMNP is recognised by the World Heritage Centre as a World Heritage Site of Outstanding Universal Value according to **Natural** rather than **Cultural** criteria (**Robben Island** is recognised in terms of **Cultural** criteria and the **Maloti-Drakensberg Park** in terms of **Mixed** criteria). As such, TMNP is also protected by the **World Heritage Convention Act, Act 49 of 1999**. The inclusion of "cultural landscape" in Recommendation **258** must therefore be seen as acknowledging the precinct's status as a Provincial Heritage Site that forms part of a "cultural landscape" falling **outside** the Park and including the historic farmlands of the Constantia Wine of Origin ward to the north.

It must be assumed that SANParks (and any concessionaire) sees it as such and will continue to, in line with the TMNP PMP, accord the Tokai Manor Precinct the highest level of protection afforded by the **National Heritage Resources Act, Act 25 of 1999** [see CoCT-Map-Viewer-Heritage-sites-Tokai-Park.jpg attached and DEA 2016 – **Cultural Heritage Survey Guidelines and Assessment Tools for Protected Areas in South Africa**]. The restoration and conservation of the **Tokai Manor Precinct** and its surrounding area, as requested by recommendation **258**, will greatly enhance its significance both as a Provincial Heritage site and a part of any cultural landscape into which it might fall.



It should be noted here that the History and Cultural Heritage Group considered several definitions of "cultural landscape", including the UNESCO definition above. In the South African context, work by Attwell and Todeschini on the contribution of vernacular architecture to cultural landscapes as well as Attwell's 2005 [Cultural Heritage Strategy for the City of Cape Town](#) (part of the City's [Integrated Metropolitan Environmental Policy \(IMEP\)](#)) were considered.

Conclusion

SANParks has attempted, by way of the TCDIP, to address the concerns of the public and other stakeholders at Tokai and Cecilia – and it has sought to accommodate them all. However, by not putting forward a workable or implementable vision derived from public recommendations and suited to SANParks mandate as our national conservation authority, it has let us down. In not directly addressing contentious issues, e.g. the retention of plantation pines and the desire for shade on the part of some stakeholders, it has delivered a document serving as an appendix to its 21 February document, [Summary of Proposals by Working Group received during Phase 2 of the Tokai Cecilia Management Framework Review Process: August 2021 to January 2022](#).

In trying to separate out workable from unworkable solutions by way of Projects and Programmes, it is perhaps guilty of that old cliché, rearranging deckchairs on the Titanic.

As our primary conservation authority, SANParks finds itself, at a time of existential crisis for humans and nature, charged with restoring and conserving our natural and

cultural heritage at Tokai and Cecilia. As such, it is in a strong position to tell the public what is feasible and what is not.

History and our current predicament shows us that, all too often, our focus on a transient culture of consumption comes at the expense of nature.

There is a reason TMNP is a World Heritage Site in terms of Natural rather than Cultural criteria. Where cultural landscapes have been declared, it is in places where, over centuries or millennia, people have lived in harmony with nature and each has shaped the past, present and future of the other. Our history at the foot of Table Mountain shows that we are all too willing to sacrifice nature at the altar of short-term cultural desire.

We can acknowledge our different cultures at the Cape, but we cannot use them to further shape nature in our own image. Similarly, we must allow nature to now play a greater role in shaping our dysfunctional cultures. SANParks is best placed to advise us how this can be done at Tokai and Cecilia. It's therefore my hope that the revised version of the TCDIP will be less ambiguous than this, the first "interim" draft.

As ever ...

Mike

Note: This submission constitutes my personal "take" on the Friends of Tokai Park submission, which I support. I have also read and unreservedly endorse the submissions of Dr Berta van Rooyen and Ian Preston.