



deVilliers Brownlie Associates

**Cape Peninsula National Park
Towards a Conservation
Development Framework Report
and Synthesis Mapping**

**Comments and Responses Report
Synthesis of Written Submissions
and Responses by Setplan**

August 2000

Client: South African National Parks

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EXECUTIVE SUMMARY

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

In June 2000, a draft document, entitled "Towards a Conservation Development Framework for the Cape Peninsula National Park", as well as a series of six maps synthesising available information on the CPNP, were made available for public comment.

This report synthesises the thirty comments received on the document and maps, and present Setplan's response to the comments, for consideration by the SANP.

A number of **general comments** were submitted, as follows:

- A number of positive comments on the current process.
- Suggestions for improved public participation.
- The legal implications for CPNP of the National Heritage Resources Act, 1999.
- Concerns about land ownership in the context of the scope of this study.

Comments on the Towards a Conservation Development Framework Report focused on:

- Lack of clarity concerning SANP and CPNP's management policies and plans.
- Significant shortcomings in the heritage resources information base which could affect the preparation of an adequate CDF.
- Suggestions for refining the planning principles on which the CDF will be founded.
- The need to incorporate the elements and principles of strategic environmental assessment.

Comments on the Synthesis Mapping focused on:

- Significant inadequacies of the information base used to prepare the Cultural and Historical Features Map.
- Certain shortcomings in the information base used in the ecological significance mapping, particularly with regard to the south Peninsula.
- Inconsistencies in the use of categories in mapping.
- Suggestions for revising and correcting inaccuracies on the different maps.

The suggestions and comments have added value to the planning process and are to be addressed in the CDF process. Setplan, in responding to the comments, has highlighted a number of key actions which need to be initiated, namely:

- ❑ Deficiencies in the information base on cultural/heritage aspects, including landscapes, must be addressed as a matter of urgency. To address this deficiency, CPNP has indicated its intention to prepare a Heritage Resources Management Plan. More specifically for the CDF process, CPNP is to prepare an improved, although provisional, heritage resources base map.
- ❑ Synthesis Maps should be revised to reflect specific spatial information provided in the comments where at all possible. Other comments on these maps, which require additional sourcing of information, standardisation of data, or research, are to be handed over to the SANP for attention and incorporation into the ongoing Geographic Information System for the Cape Peninsula National Park (CPNP); this system continually updates pertinent information on the CPNP.
- ❑ Comments on other aspects related to the preparation of a Conservation Development Framework (CDF) should be addressed in the draft CDF, in the manner indicated in the responses to comments provided.

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Addendum 1	List of Interested and Affected Parties who Submitted Written Comment on the Towards a Conservation Development Framework Report and Synthesis Mapping	A1.1
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INTRODUCTION

1. Background

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

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

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

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

Comment on the report and maps was invited by way of letters sent to all IAPs on the IEMS database and articles in local newspapers. The document and maps were placed in 10 local libraries within the Cape Metropolitan Area, as well as on the CPNP's website for public scrutiny. A deadline for submission of comment, namely 21 days, was stipulated. However, extensions to this deadline were granted on request, on a case by case basis.

2. Purpose of this Report

The purpose of this report is to:

- Synthesise comments which were submitted in writing on the Towards a Conservation Development Framework Report and the Synthesis Mapping.
- Respond to comment.

3. Approach to the Synthesis of Comments

deVilliers Brownlie Associates were responsible for synthesising the comments. Comments are grouped in one of three main sections, namely:

- A:** General comments on the Towards a Conservation Development Framework Report and the Synthesis Mapping
- B:** Comments on the Towards a Conservation Development Framework Report
- C:** Comments on the Synthesis Mapping.

The following approach was taken to the synthesis of comments:

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

Setplan's response to comments on both the Towards a Conservation Development Framework Report and the Synthesis Mapping is given in each section of this report.

4. Principal Comments

4.1 Comments Received

Addendum 1 contains a numbered list of parties who submitted written comment on the Towards a Conservation Development Framework Report (hereinafter the TCDF) and Synthesis Mapping. A total of 30 submissions were received, comprising :

- 4 submissions from individuals or groups of individuals.
- 15 submissions from non-government organisations (NGOs).
- 8 submissions from government departments, quasi-government departments or government bodies.
- 1 submission from a private nature reserve.

- ❑ 1 submission from a planning and development consultant.
- ❑ 1 submission from a representative of a professional institute.

4.2 Focus of Comments

The main comments are presented below as either 'general' comments on both the TCDF and the Synthesis Mapping, as comments on the TCDF, or as comments on the Synthesis Mapping.

4.2.1 General Comments

There were a number of general comments as follows:

1. A number of positive comments on the current process.
2. Suggestions for, and comments on the approach to communication and participation by interested and affected parties.
3. Legal implications of, and CPNP compliance with the National Heritage Resources Act, 1999.
4. Concerns about land ownership in the context of the scope of this study.

4.2.2 Towards a Conservation Development Framework Report

Comments focused on:

1. Lack of clarity concerning SANP and CPNP's management policies and plans.
2. Concerns about the shortcomings in the cultural sites and landscapes/heritage information base which could adversely affect the preparation of an adequate CDF.
3. Suggestions for refining the principles of environmental and financial sustainability, equitable access and participation and partnerships.
4. The need to incorporate the elements and principles of strategic environmental assessment.

4.2.3 Synthesis Mapping

Comments focused on:

1. Significant inadequacies of the information base used to prepare the Cultural and Historical Features Map. This Map is believed to be inadequate in a number of important respects, namely gaps in information, no clear criteria for deciding on such resources, and a narrow, restrictive interpretation of the subject.

2. Certain shortcomings in the information base used in the ecological significance mapping, particularly with regard to the South Peninsula.
3. Inconsistencies in the use of categories in mapping, particularly in relation to the maps on ecological sensitivity, cultural and historical features, and current land uses and activities.
4. Suggestions for revising, refining and correcting inaccuracies on, in order of decreasing comment received, the current land use and activities map, the cultural and historical features map, the ecological significance map, the visual features map, the hazardous and unstable areas map and the vehicular access routes and traffic map.

Section A

General Comments on the Towards a Conservation Development Framework Report and Synthesis Mapping

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

1. The scope of the Conservation Development Framework.
2. Positive feedback on the report and mapping.
3. Cultural/heritage aspects.
4. Legal considerations.
5. Communication.

1. Scope of CDF

- 1.1 Prior to preparing the CDF, the following aspects, reflecting an approach which covers the functional diversity of roles played by the CPNP, need to be addressed and/or considered (27):
 - The role of the CPNP needs to be identified from an international perspective through national to regional, metropolitan, submetro and local contexts, and the significance of these roles determined; ideally, the CDF should cater for the CPNP's role as seen from global through to local perspectives.
 - The functional relationships between different areas, elements and landscape forms within the CPNP which characterise its roles should be determined. [Newlands Forest is used to illustrate this point in the comment.]
 - The edge of the Park is a cadastral not a functional edge in all cases; the role of the Park in relation to the broader city context and transition from mountain to city needs to be assessed (27).
- 1.2 Concern that CDF is being compiled for areas not formally under SANP's ownership or management. Needs to be some form of buffer/'backup' zone

in case not all planned land acquisition is successful to avoid core of CPNP being at risk from disturbance (16).

- 1.3 It is recommended that this report should only deal with State, Provincial or Local Authority property, not with private land. There is concern that both the SANP and the SPM are “undertaking their own studies with seemingly the same agenda and strategy, and unilaterally determining development nodes” on privately owned land (23).

Response by Setplan to 1.1-1.3

1.1 The functional diversity of roles played by the CPNP, primarily in terms of biodiversity, heritage and tourism, was broadly addressed during the IEMS process that informed the Park’s Management Policy. The TCDF starts off by pointing out that the CDF initiative stems from the CPNP’s IEMS process and is identified as a requirement in the Park’s Management Policy.

Whilst the CDF will strive to determine the functional relationship between different areas, elements and landscapes – the level of detail will be commensurate with that of a metropolitan scale land use plan.

We agree that the role of the Park in relation to the broader city context needs to be assessed.

1.2 Principle of using buffer zone/s to protect core conservation areas is supported.

1.3 In terms of the request for the CDF to cover State held land only, we would point out that the CDF for the Park needs to be informed by an integrated perspective of the Cape Peninsula in its entirety, as reflected in the principle of ‘holism’ underpinning the Park’s Management Policy. The CDF’s proposals, however, will focus on public land within the CPPNE and strive to ensure land use compatibility with abutting privately held land. The CDF will not add to or take away from existing land use rights.

2. Positive Feedback

- 2.1 “Good foundation for the preparation of the CDF” (3).
- 2.2 Synthesis maps are “extremely informative” and already point out problems that should be addressed and solved in the CDF (9).
- 2.3 On the whole the draft document provides a “satisfactory contextualisation of the proposed CDF” (14).
- 2.4 Support the notion of an overarching spatial framework for the entire CPNP and adjoining urban areas where appropriate, to identify nodes for

developing visitor facilities and use zones for conservation and various recreational activities, which will be drawn up through a participative and holistic planning process (24).

- 2.5 Support for the process (25) (30); the “report and maps show excellent insight” in what must be achieved to conserve Table Mountain (25).

3. Cultural/Heritage Aspects

- 3.1 CDF needs more conceptual development in the field of cultural landscapes and sites; once additional analysis is available and conceptual development has taken place, it will be possible to make decisions around particular sites. Such steps are needed to ensure that decisions aren't based on development intentions rather than empirical data and assessment (27).
- 3.2 Heritage analysis and cultural landscape studies that are lacking at present should be undertaken as soon as possible; if this information is not yet available it will have to be collected before a Heritage Impact Assessment (HIA) is completed (27).
- 3.3 Seems to be premature to identify development areas until basic heritage research has been undertaken (22).

Response by Setplan to 3.1-3.3

3.1 We agree that CDF needs more conceptual development in the field of cultural sites and landscapes.

3.2 Deficiencies in the information base concerning cultural/heritage aspects were acknowledged in the TCDF and must be addressed. To deliver a credible and useful CDF product, CPNP has indicated its intention to prepare an improved, albeit provisional, heritage resources map. This map will be improved over a longer term period as part of the proposed Heritage Resources Management Plan for the CPNP.

3.3 No areas for development have been identified. Rather, a number of studies have been commissioned on areas that are in need of urgent attention, to address a range of problems facing visitors and managers at these sites.

4. Legal Considerations

4.1 The National Heritage Resources Act, 1999 (Act 25 of 1999)

- In terms of the National Heritage Resources Act, specifically Section 38 of the Act, a developer must undertake a HIA if heritage resources would be affected by a development proposal. Table Mountain is a proclaimed National Monument in terms of the previous National Monument Act; all the 'gateway' sites have heritage significance. It is thus unlikely that exemptions from this requirement would be granted; SANP/CPNP would thus have to comply with this Section of the Act.

The SA Heritage Resources Agency would have to decide, on the basis of the HIA, whether to allow development and under what conditions (22).

- Conservation work requires compliance with the extended definitions of cultural sites and contexts as identified in the Act. Development or substantial alteration of sites in the fringe areas, and/or popular recreation areas would require HIA (27).

Response by Setplan to 4.1

4.1 CDF does not seek exemptions from the provisions of the National Heritage Resources Act, or from the Environment Conservation Act. Any proposals made in the CDF would still have to follow 'due process' before being implemented.

5. Communication

- 5.1 SANP should make more use of the media: A weekly bulletin on progress with the CPNP in the three major papers plus the local papers would do an "enormous amount to increase public awareness" (10).
- 5.2 Concern that SANP have thrown all user "eggs" into the same "basket". It would be beneficial to identify groups and individuals who have the capacity to help, rather than those who do nothing but criticise or don't not have the capacity to help, and "get them on their side". This approach would promote participation, and a sense of ownership in the CPNP (10).
- 5.3 Some institutions which are able to comment on cultural sites in the southern Peninsula – "Simon's Town Museum, SA Navy Museum, Heritage Museum and the Simon's Town Historical Society" - were not asked to do so (13) or did not receive documentation (18).
- 5.4 Important to inform the public of the completion of the CDF and facilitate access to the final report, to ensure accountability for decisions taken, an open participatory approach, and due consideration of alternatives (16).

- 5.5 Not sure why the owner of Erf 3410, Simon's Town, adjacent to Glencairn Hotel, zoned single residential, has been identified as "an important CPNP stakeholder" [documents attached to comment] (29).

Response by Setplan to 5.1-5.4

5.1 Suggestions for improving communication are welcomed and should be considered by CPNP. It should be noted, however, that CPNP already makes use of the media through a variety of means – newspapers, radio talk shows, television, the web site and through the widely circulated CPNP newsletter, Park News.

5.2 An interesting suggestion that should be considered by SANP.

5.3 All parties on CPNP data base were contacted directly for their comments. Documentation was not distributed but placed in public libraries. Additions to the list of I&APs welcomed. Suggest SANP invites institutions listed who are knowledgeable on cultural sites to the proposed workshop (see response 3.2).

5.4 We agree with the suggestion and recommend SANP follows this approach.

Section B

Comments on the Towards a Conservation Development Framework Report

This section contains eleven main groups of comment, addressed in separate sections. Three sections address broad issues around the TCDF, whilst eight groups of comment focus on specific sections of the TCDF, as follows:

1. Time allowed for comment.
2. Focus and emphasis of the CDF.
3. Reference to the Draft Development Framework.
4. "What is a CDF" [Section 1 of the TCDF].
5. "Why is a CDF being prepared" [Section 2 of the TCDF].
6. "How does the CDF fit in with the Park's plans" [Section 3 of the TCDF].
7. "What process will be followed to prepare the CDF" [Section 4 of the TCDF].
8. "What aspects will the CDF cover" [Section 5 of the TCDF].
9. "How are concerns previously raised on the DDF being addressed" [Section 6 of the TCDF].
10. "On what planning principles will the CDF be founded" [Section 7 of the TCDF].
11. "How does the CDF Fit in with Plans of Surrounding Local Authorities?" [Section 8 of the TCDF].

1. Time Allowed for Comment

- 1.1 Too short time in which to comment (2).

2. Focus and Emphasis of CDF

- 2.1 Impression that the “entire focus” of the CDF is on managing visitors. This consideration should not replace the primary aspect of conservation (9).
- 2.2 In some sections of the TCDF, it appears as if the emphasis is on conservation rather than development. Development opportunities must be realised as a key means to ensure protection of the natural environment (14).
- 2.3 “CDF” implies that the study is about “development of conservation”. The TCDF indicates that the study will be about “conservation and development”, which is misleading. (3).

Response by Setplan to 2.1-2.3

2.1 The primary - but not the entire - focus of the CDF is on visitor management. The overriding importance of protecting the Cape Peninsula’s internationally unique natural, cultural and visual resources is stated in the “Towards” document as the CDF’s point of departure. The CDF is not intended as CPNP Environmental Management Department’s action plan.

2.2 & 2.3..The CDF is about balancing conservation and development within a conservation ethic.

3. Reference to the Draft Development Framework

- 3.1 In the interests of “transparency and credibility” the DDF should not be referred to or included in the CDF process. The DDF was conceived without sufficient stakeholder participation and was considered as not reflecting public sentiment or a collective vision for the Park. The new IEMS process has redressed these grievances (27).

Response by Setplan to 3.1

3.1 We disagree that the DDF should not be referred to. At the time, SANP made an undertaking to those who commented that the issues raised on the DDF would be revisited and addressed.

4. “What is a CDF?”

- 4.1 The CDF idea needs further explanation and the approach needs to be ‘unpacked’. It is not clear how conservation and development are to be

weighted, nor what criteria conservation and/or development options are to be decided (27)

- ❑ What criteria were used to identify 'unique and internationally significant natural and cultural assets'? (27)
- ❑ Against what criteria are conservation and/or development options to be decided? For example, if disturbed, is a site developable, should it be restored and preserved, or preserved in view of the culturally significant nature of disturbance? (27)
- ❑ The conditions under which development would be allowed should be clearly stated to avoid conflict situations at a later stage (27).
- ❑ The CDF should show how human activities and development are to be integrated so that priorities are addressed to the benefit of both (16).

4.2 The 'relevant environmental procedures' referred to should be explained in more detail (16).

Response by Setplan to 4.1-4.2

4.1 We agree that the CDF should provide more detail than that given in the TCDF on the methodology adopted, inclusive of specifying assessment and prioritisation criteria used.

4.2 The CDF will specify relevant environmental procedures to be followed in the implementation of proposals.

5. "Why is a CDF being prepared?"

5.1 An overall spatial framework for the Park should be informed by an overall conceptual framework. Park management should try to place all their development and conservation intentions within this overarching framework (27).

- ❑ It is not clear how studies on a number of sites in the CPNP relate to the broader framework of the Park's management intentions or their 'vision' for future management of the Park.
- ❑ The CDF has focussed attention on areas of strategic importance (eg Constantia Nek and the Glen) without explaining how they contribute to the broad policy framework for the CPNP; it is essential to link the planning of such sites to the broader planning framework for the Park and the EIAs.
- ❑ Priority sites cannot really be assessed in the absence of a conceptual framework and vision in administrative, economic, social and environmental terms; subsequent work on the CDF should inform the analysis done on these strategic sites.

- 5.2 Suggest include another point in “Why is a CDF being prepared” that argues that if we aren’t seen to be realising value out of the land, it may be perceived as not being worth conserving and therefore receive little support (14).
- 5.3 The statistics of 4.5 million visitors pa are a distortion and must be placed in context – probably a major portion of that figure represents visitors/tourists to Cape Point and the Cableway, implying that different considerations should be given to these areas in contrast to the real conservation areas (20).

Response by Setplan to 5.1-5.3

5.1 The Park’s Management Policy provides an overarching framework for conservation and development in the CPNP, supported by the Strategic Management Plan, within which the spatial component – namely the CDF – is being developed.

A number of sites in the CPNP are in need of urgent attention as they are experiencing severe problems related to degradation and safety. These sites have not been earmarked for development, per se. Studies have thus been commissioned to address these problems. Planning for these sites will be undertaken in the context of the CDF. The necessary EIAs and HIAs will be carried out should any development be considered at these sites.

5.2 Agree with the suggestion made.

5.3 Visitor statistics presented are not a distortion, but rather a best estimate of overall magnitude of Park visits per annum. We agree that popular sites (eg: Table Mt cableway) require different considerations to the priority conservation areas and that where possible we should strive to disaggregate overall visitor numbers to specific sites. Unfortunately this information is not available at present.

6. “How does the CDF fit in with the Park’s plans?”

- 6.1 It is not clear from Figure 1 where the CDF fits into the framework (16).
- 6.2 It would be useful if an outline of the CPNP’s current Management Policy and Strategic Management Plan were included in the final CDF (16).
- 6.3 Confusion between the SANP’s Management Policy and the CPNP’s policy. CPNP should not be “encumbered” by SANP’s policy; it has a unique urban character (20).
- 6.4 The CDF should be informed by the Policy arising from the IEMS process and the Strategic Management Plan, and in turn should inform both. Thereafter, the Strategic Management Plan and CDF should inform the Business Plan and Implementation and Operation [diagram reflecting this suggestion attached in comment] (27).

Response by Setplan to 6.1-6.4

6.1 Agree that figure should be expanded to show where CDF fits in.

6.2 Agreed.

6.3 CPNP must operate within ambit of SANP policy, but CDF must also recognise and respond to unique metropolitan context of the Park.

6.4 Noted.

7. “What process will be followed to prepare the CDF?”

- 7.1 Would be worthwhile – in stage (d) or (e) of Section 4 - considering presenting a range of scenarios to IAPs, perhaps taking the form of a cost-benefit analysis, which would allow people to look at their possible future environment and desire to realise a ‘best case’ option (14).
- 7.2 The CDF should explain how the synthesis maps link to the 1996 Use Zones; this latter updated map was not included in Annexure A and no reference is made to it in that annexure (16).
- 7.3 Analysis of historically significant sites and a cultural landscape analysis must be done and incorporated into the CDF. Such information is likely to be a key decision-making tool and become increasingly critical. The sites identified as having most potential for development, ie the ‘disturbed’ sites, are often also the historical or culturally significant ones (27).
- 7.4 The process proposed is not adequate, as it should incorporate the key elements and principles of Strategic Environmental Assessment (SEA) such as sustainability objectives and criteria based on the limits of acceptable change, and cumulative impacts. [Reference is made to the CSIR’s guideline document on SEA in SA dated February 2000] (24):

Response by Setplan to 7.1-7.4

7.1 Agree that alternatives should be considered in the draft CDF.

7.2 There is no direct link between the 1996 Use Zone map and the 6 Synthesis maps presented in the TCDF. The CDF needs to use these 6 maps and generate others that are necessary to inform the updating and revision of the 1996 Use Zone map, as appropriate, as one of the products of the CDF.

7.3 See responses to 3.2 in Section A, and 5.1 above.

7.4 Although not presented in the same terminology, the approach proposed in the TCDF is intended to be consistent with SEA. In the CDF report we will make this link more explicit and set out the elements and principles of the SEA approach followed. The Park's Management Policy makes specific reference to protection of ecological, cultural and scenic resources, linked to ecological, social and economic sustainability, as well as commits the CPNP to develop sustainability indicators for the Park in collaboration with stakeholders. Broad sustainability indicators at Park level will be covered in the CDF; indicators relevant to specific areas and/or sites, and appropriate for monitoring and evaluation purposes, are to be addressed once specific management areas and/or use zones have been determined.

8. "What aspects will the CDF cover?"

- 8.1 The parallel exercise to incorporate the Peninsula's marine resources into the CPNP refers. It should be clarified that "only sections of the coast will be incorporated" and "will also include marine resources abutting the CPPNE" (16).
- 8.2 The CDF's focus should be on the "fringes of the *nature area*" instead of the 'fringes of the Park', because the Park boundaries are dynamic (24).
- 8.3 The CDF should address linkages with the surrounding urban metropolitan environment and consider the urban nature of the Park (27).
- 8.4 The content of the CDF should be amended to include the key elements and principles of SEA (24).

Response by Setplan to 8.1-8.4

8.1 Agreed that this clarification is needed.

8.2 Agree with this proposed clarification.

8.3 Agree that putting the Park in its metropolitan context is necessary.

8.4 Agree, but recognise the flexibility of the SEA approach as emphasised in the Dept. Environmental Affairs and Tourism's Guideline Document (2000).

9. “How are concerns previously raised on the DDF being addressed?”

- 9.1 Not happy with the interpretation of the main areas of concern, as they miss two critical points, namely (24):
- ❑ No notice was taken of public submissions made during workshops or in writing prior to the drafting of the DDF (numerous examples provided in comment). Input should be incorporated in the framework or adequate motivation must be given in rejecting this input.
 - ❑ No SEA was incorporated in the DDF procedure and the process used to arrive at the DDF recommendations was hard to fathom.

Response by deVilliers Brownlie Associates

9.1 Both points raised are accurately reflected in the DDF Comments Report. However, in the interest of clarity and brevity, each and every issue raised by different IAPs could not be given in the TCDF. Rather, only the key areas of concern have been provided. Both points, amongst others, have therefore been ‘collapsed’ into the ‘process’ area of concern, which focuses on the “questionable process followed, inadequate public participation” for the DDF.

10. “On what planning principles will the CDF be founded?”

- 10.1 Need more information on what form and process will be followed to develop a set of land use principles to guide the planning of the Park (23).
- 10.2 The planning principles on which the CDF is based should be amended to include the key elements and principles of SEA (24).
- 10.3 The basic principles are supported, but it is not clear how these are to be applied without sacrificing certain sites to maintain others (27).

Response by Setplan to 10.1-10.3

10.1 *The CDF needs to be based on planning principles that are consistent with the Constitution, the Development Facilitation Act, the National Environmental Management Act, the Provincial Planning and Development Act and the Park's Management Policy. Informed by this legislation and policy, and comments made on the TCDF, the consultants will refine the set of initial principles and document them in the draft CDF. Further comment on these principles will then be obtained from IAPs in the next iteration of consultation.*

10.2 *Agree, noting that SEA principles are consistent with those underpinning Integrated Environmental Management, to which the CDF subscribes, and are set within the context of NEMA (see above).*

10.3 *CDF will apply the principles with the aim of balancing conservation and development imperatives, not "sacrificing" sites.*

a) Environmental Sustainability

1. With regard to the maintenance of cultural integrity – the only culture in a nature park is that of fauna and flora; neither the culture of "spoiled rich tourists" nor the culture of locals is relevant (9).
2. River corridors and tributaries forming transverse corridors across valleys should be preserved to allow transitional zones with reduced densification towards the river, and migration routes for species (5).
 - Hout Bay River is the only remaining river on Table Mountain whose corridor could, and should, be restored and preserved in entirety (5).
 - Hout Bay River corridor could be used to create a "safe trail" from Kloof Nek to Hout Bay River and sea. It could be a model of "partnership ecotourism" between the community and the Park (5).
3. Degraded land inside and abutting the Park should be catalogued and assessed in terms of its ecological value, context and potential for restoration with a view to long term restoration (5).
4. 'Sustainability' should refer to cultural sites as well, with an emphasis on recognising and enhancing their authentic qualities, and with management systems in place to ensure their maintenance (27).

Response by Setplan to 10.3a)

1. *Disagree that conservation of fauna and flora is of overriding importance. Reference is made to the Park's Management Policy where policy themes embrace the conservation of not only ecological but also cultural, historical and scenic resources for present and future generations..*
2. *Agree that establishment of ecological corridors (eg: along rivers) is important for environmental sustainability.*
3. *This practical suggestion should be taken up by CPNP environmental managers. A catalogue of degraded cadastral portions along the peninsula is beyond the scope of the CDF however.*
4. *Agree.*

b) Financial Sustainability

1. Financial sustainability should in no way compromise environmental sustainability (20). If economic sustainability is to be the driving force of the development planning process, the integrity of the Park will be severely jeopardised (23).
2. Terms such as 'financial sustainability' are meaningless and unsubstantiated without any corresponding detail; at no stage are the financial accounts and budgets of CPNP and SANP made readily available for public scrutiny (23).
3. It should not be conditional that the Park will pay for itself; the emphasis should be on its 'contributing' to financial sustainability(9).
4. Financial sustainability is likely to become an area of conflict unless it is made clear that finance accrued is ploughed back into the CPNP and not used to support other less financially successful national parks (27).
5. Financial sustainability should be achieved by:
 - Public sector funding: Substantial financial support from the public sector in return for increased economic benefits accruing to the Metropole and indeed the whole country; the area is a national and international treasure (20) (23).
 - Private sector contribution in acknowledgement of the increased economic benefits accruing to the Metropole – hotel and hospitality industry should pay a "bed tax" for the Park's benefit, and the Park should not compete with that industry (20).

- Charging users of the Park's facilities and amenities according to the degree of impact on the Park by way of, eg, season tickets (20).

Response by Setplan to 10.3b)

1. *Agree, TCDF speaks of the "imperative of environmental sustainability".*
2. *As stated in the CPNP Management Policy (Theme 1, Goal 1, Objective 1d)i) SANP compiles annual financial statements that are available to the public.*
3. *Agree, see CPNP Management Policy (Theme 1, Goal 1, Objective 1d).*
4. *This issue was addressed in the IEMS process where it was acknowledged that the CPNP is one in a family of nineteen national parks, which together must be managed on a sustainable basis.*
5. *Interesting suggestions that should be considered by CPNP management, as well as Unicity officials and councillors.*

c) Sense of Place

1. Development options should consider the impact on the Park within its urban context. Placing development on the Park fringes could place a strain on the visual integrity of the mountain urban edge and could "whittle away" visually and culturally significant edges (27).
2. The protection of elements associated with the history of the mountain constitutes the protection of a 'sense of place'; a sense of place relies not only on spatial and environmental qualities but is associated with memories and history. Protecting the sense of place thus includes protection of the historic stone pines and other mature trees and plantations (27).

Response by Setplan to 10.3c)

1. *Agree in principle: Any impact would depend on the nature of development and its siting.*
2. *Agree that 'sense of place' is also associated with memories and history. However we need to recognise that there are sometimes conflicting interests that have to be weighed up within the cultural realm (eg: pre-colonial versus colonial landscape values), and between cultural and ecological realms, applying accepted policies and making trade-offs as and when appropriate.*

d) Equitable Access

1. There would be strong objection to limiting numbers of visitors/users in certain areas. Suggest that this end could be achieved by recognising that certain areas should have difficult access (rough paths, few amenities). That is, most visitors would be subtly attracted to high impact areas with sophisticated facilities and amenities (20).
2. Implementation of this principle:
 - ❑ Numerous mountain bikers despair that CPNP will cater for their needs. Mountain biking is one of the most popular recreational activities in the world today; cyclists should be treated with fairness like other users of the CPNP - mountain bikers are excluded from over 99% of CPNP trails. Accepted that mountain bikes can cause erosion, but appropriate management could meet ends of conservation and mountain biking (11).
 - ❑ Additional access for mountain bikes sought in the spirit of the Silvermine Nature Reserve Management Plan of 1996. Still no response from CPNP to a detailed written proposal, after “many months”. [Attention is drawn to a copy of the proposal which is included with the comment, entitled “Proposal for Mountain Cycling in the Silvermine North Section of the CPNP” by Robert Breyer, PPA, dated 27 April 2000.] (11)

Response by Setplan to 10.3d)

1. *Agree that differential access and facility provision is a means of encouraging patronage of some areas and discouraging it at others.*
2. *Note taken of needs of mountain bike fraternity. CDF will not, however, resolve the specific needs of all categories of users but should establish an overall spatial framework within which Park management and organizations representing user groups can address these needs.*

e) Participation and Partnerships

1. Environmental community-based organisations (CBOs) should be involved in local conservation issues which impact on the park, and their opinions should be respected. *Ex officio* Park delegates should support and take part in conservation projects/activities undertaken by local CBOs; not necessarily financial support but facilitate funding from elsewhere or give technical expertise on an infrequent basis (5).
2. The approach to, strategy or plan regarding, and approach to evaluating and appointing commercial tourism operators, are not clear and need to be determined. Tourism is our future and ecotourism is the “figure-head” thereof. [A number of suggestions

and an offer of assistance in this regard are given in the comment. Reference is made to a “long document” submitted personally to the Environmental Manager (CPNP) on the screening and appointment of such operators (15)].

Response by Setplan to 10.3e)

1. *Interesting suggestion that CPNP should take note of. CBOs already interact with management in many areas around the Park and such interaction is encouraged.*
2. *Agree that criteria for the awarding of tourism concessions are necessary, but this aspect is beyond the scope of the CDF.*

11. “How does the CDF fit in with plans of surrounding Local Authorities?”

- 11.1 The CDF should fulfil the requirements of the “underlying principle” contained in the draft Southern South Peninsula Local Structure Plan (SSPLSP), as well as the requirements of Section 4.3(b) of the CMA: Peninsula Urban Structure Plan, 1988. In this regard, planning of the Plateau Road area is highly contentious (24). [Detailed reasons and history given in the comment.]
- 11.2 SANDF responsibility for, and role in, managing Klawer Valley and coastal batteries on Table Mountain are explained. [Details given in comment.] It should be noted that all SANDF property is the responsibility of the Dept Public Works. SANDF manages these areas in a sustainable way for further military use; should the need arises these areas would be handed back to this Dept for other-than military use (25).

Response by Setplan to 11.1-11.2

- 11.1 *Such principles will be considered in the CDF planning process.*
- 11.2 *SANDF comments noted.*

Section C

Comments on the Synthesis Mapping

This section contains two main groups of comment, addressed in separate sections, namely:

- C.1** General comment on the mapping.
- C.2** Comment on specific maps.

The response to both the general comments on the synthesis mapping, as well as on specific maps, needs to be seen within the broader context of GIS mapping.

Setplan's Overall Response to Comments Submitted on the Synthesis Mapping

The 6 thematic maps produced for the TCDF document were specified as a required output in the consultant's terms of reference from SANP. The subject matter, or themes, of the maps reflect some of the central concerns the CDF will address. As such, they were prepared to serve as one of the initial informants to the CDF. In the course of preparing the CDF it will be necessary to produce additional synthesis maps as well as refine those already produced.

The 6 synthesis maps produced to 'kick-start' the CDF process elicited considerable comment. For these comments and the additional information provided we are most appreciative. Aspects which need to be considered in evaluating the responses to comments may be summarised as follows:

- The maps are a geographical representation of some of the data contained in the Park's GIS. For every line segment, icon or polygon shown on a map, the GIS data base provides details (eg: name, registration date, source, description, etc) when that feature is 'clicked-on'. Where commentators have provided additional information in a GIS compatible format then it can be incorporated into the Park's spatial information system. If not in a GIS compatible format, then such information first has to be converted before it can be incorporated into the system. Whilst the conversion and geo-referencing of spatial data is beyond the CDF consultant's terms of reference, all information received will be passed on to CPNP for possible incorporation into their GIS. This process is ongoing, the speed of which is determined by the resources available to CPNP and their current priorities.*

- *Comment received on the maps highlights significant inconsistencies in the Park's information base concerning biophysical, cultural/heritage and visual resources. Traditionally the Cape Peninsula's biophysical environment has been extensively researched and consequently the spatial information base is relatively extensive. Unfortunately the same cannot be said of the cultural environment and of visual aspects. As SANP have recently been made custodians of all these facets of the environment, the comments made on the maps are indicative of the mounting pressure on CPNP to redress historical imbalances in environmental management of the Cape Peninsula. It will not be possible to redress historical imbalances in the short term, and resources need to be secured for the required research programme.*

- *Some of the commentators requested the findings of recent detailed botanical surveys to be included in the maps. In most cases, however, these detailed surveys have used a different classification system to that developed by the CSIR in their 1996 research. Before all information can be consolidated in a map, it is necessary first to standardise the classification systems. Whilst this exercise is beyond the terms of reference of the CDF, in our responses we have made suggestions on how the existing information base could be updated.*

Specific responses to the various comments made on the maps are set out in C.1 and C.2 below.

C.1 : General Comments on the Synthesis Mapping

This section contains five main groups of comment, addressed in separate sections. The groups of comment relate to:

1. Omissions and shortcomings in mapping.
2. Selective use or manipulation of information.
3. Use of symbols on the maps.
4. Reference to CMC significance mapping.
5. Boundaries of the CPPNE.

1. Omissions and Shortcomings in Mapping

- 1.1 The scale of mapping should be at a “significantly finer scale” to enable attention to be given to more detailed elements (27).
- 1.2 Separation of ‘visual’ and ‘cultural and historical’ features is problematic; the former is a key part of the analysis of cultural landscape of the CPNP. Separating them makes cultural landscape analysis difficult (27).
- 1.3 Alien vegetation and fire cannot be considered “temporary occurrences”; management of conservation areas must include these assessments and therefore they should be mapped (12).
- 1.4 “Far too much reliance” on using Geographic Information Systems (GIS) and far too little consideration for new research to obtain relevant data to update GIS (24).
- 1.5 Should include a map of the current ownership, land use and occupation of land to identify all role players and neighbours who could influence the CPNP and who would be subjected to the final management plan (25).

Response by Setplan to 1.1-1.5

1.1 The nature of the CDF and concomitant resources allocated to the CDF project do not make allowance for “significantly finer scale mapping” – such mapping will take place through appropriate finer scale planning and research.

1.2 The two maps were originally combined. When presented to the Heritage Committee of the Institute of Architects and Landscape Architects the consultants were requested to separate the 2 maps!

1.3 *It should be noted that there is spatial information in CPNP's GIS concerning alien vegetation and fire. Both are rapidly changing variables and are not considered appropriate for plotting in the CDF; the presence of alien vegetation is sometimes used to motivate development when in fact the area may lend itself to rehabilitation, and fires are ongoing occurrences in the CPNP.*

1.4 *The cautionary comment regarding over-reliance on GIS is noted. We will strive to indicate where new research is needed to update the GIS.*

1.5 *Agree that this would be a useful informant to the CDF.*

2. Selective Use or Manipulation of Information

- 2.1 GIS is potentially a powerful tool for manipulating the outcome of spatial planning and thus there is concern about information in Maps 1, 4 and 6 in particular (24).

Response by Setplan to 2.1

2.1 *IAP and professional input is called for, to ensure that such manipulation does not occur.*

3. Use of Symbols on Maps

- 3.1 Symbols for 'religious sites' and 'historic buildings' are too similar (8).
- 3.2 The "RIP" icon is "unfriendly" for grave sites (12).
- 3.3 Disappointing that 'natural features' on the Peninsula (refer to Map 3) are depicted by a pine tree, a major threat to the natural environment (19) (24).
- 3.4 'Ruins' and 'buildings' are different structures and should be separated out (27).

Response by Setplan to 3.1-3.4

3.1 *Noted, will change.*

3.2 *Noted, will change.*

3.3 *Noted, will change.*

3.4 *Noted, will change where information is currently available.*

4. Reference to CMC Significance Mapping

- 4.1 Any reference to the CMC Environmental Significance Mapping should note that the maps are still in draft form and have not been adopted by the CMC. For this reason, priorities given to areas in these maps should not be used or referred to (16).

Response by Setplan to 4.1

4.1 Noted.

5. Boundaries of the CPPNE

- 5.1 Boundaries of CPPNE in all maps should be checked, eg whether Noordhoek wetlands are included (16).

Response by Setplan to 5.1

5.1 Boundaries are as currently recorded in CPNP GIS and are correct according to available information.

C.2 : Comments on Specific Maps

This section contains comment on the six synthesis maps, as follows:

1. Ecological significance map.
2. Visual features map.
3. Cultural and historical features map.
4. Current land uses and activities map.
5. Hazardous and unstable areas map.
6. Vehicular access routes and traffic map.

1. Ecological Significance Map

- 1.1 Adequacy of information base: On what research is GIS mapping based, and when was it undertaken? (24)
 - a. Concern that only the CSIR studies were used to compile this map; numerous other studies have been done which could be useful (16).
 - b. What about areas that are known to be under-researched (eg west of Red Hill Road) or researched after the CSIR studies? (24)
 - c. The recent Plateau Road environmental baseline study by the Environmental Evaluation Unit, UCT should be used in mapping ecological significance (26).
 - d. Recent environmental baseline studies for SPM should be incorporated in this mapping (details of these studies provided in comment) (30).

Response by Setplan to 1.1

Terrestrial environmental significance information was sourced from CSIR (1996) research. Marine environmental significance information was sourced from research undertaken on Marine Ecosystems as part of CMC Environmental Sensitivity Analysis and verified with Dr Barry Clark (CPNP Marine Co-ordinator). Floral classification also sourced from research done for CMC Environmental Sensitivity Analysis.

- a. *As outlined above, not only CSIR studies used.*
- b. *As explained above, not only CSIR 1996 data used.*

- c. *It is recognised that some areas are under-researched and CPNP should address this shortcoming in terms of its on-going research programme. In compiling the overall synthesis map the information arising from recent detailed studies was not used. Not all researchers use the same classification system. Standardisation of criteria used in the various detailed studies is necessary before synthesising these data. As part of its on-going research programme, it is recommended that SANP converts new information to a compatible format.*
- d. *See response to c above.*
- e. *See response to c above.*

1.2 With regard to primary plant hotspots, endemics and rare species:

- a. No definition of what constitutes a 'primary plant hotspot', 'endemic' or 'rare' species – are these species Peninsula endemics or rares, Red Data Book rares, etc? (26) These categories are not clear (12).
- b. The hotspot near Perdekloof Picnic Area is probably an inaccuracy (26).
- c. It is disputed that the greater Kleinplaas area has 'low' ecological value. [Numerous reasons are given in the comment.] (13):
- d. Query - are any plant hotspots in the Noordhoek wetlands? (30)
- e. Why are Signal Hill/Lions Head, Slangkop and Constantia 'hot spots'? According to what sources? (12)

Response by Setplan to 1.2

- a. *Definitions are as per CSIR 1996 study.*
- b. *Agree that it appears to be an anomaly, will check.*
- c. *The map does not classify this area as being of 'low' ecological value.*
- d. *In terms of the CSIR 1996 data and definitions used in compiling the map, there are no hotspots recorded.*
- e. *The CSIR 1996 study was the source of this information.*

1.3 With regard to fauna:

- a. Mammals, for example baboons, appear to be missing from this map. Foraging areas, movement routes and areas of potential conflict with humans are important. Fifteen conflict areas have been identified for baboons in the southern Cape Peninsula, south of the Kommetjie-Fish Hoek road, which contains 74% of the Cape Peninsula's baboons. [Attention drawn to a recent WWF funded study entitled "Baboon Management Strategy for the Cape Peninsula" by Ruth Kansky and Dr

Dave Gaynor (excerpts of this report, including “Chapter 7: Baboon hotspots and considerations for further development”, and a map showing numbered “problem spots’ for human development”, were included in the comment)] (6).

- b. Query – aren’t any important fauna areas along the Constantia Valley river corridors? (30)

Response by Setplan to 1.3

- a. *Information will be incorporated.*
- b. *There could be important fauna areas along the Constantia Valley river corridors, but CPNP’s GIS currently does not reflect any. This aspect could be incorporated into the Park’s research programme.*

- 1.4 Approach to ‘transformed land’ is inconsistent and should be explicit:
 - a. A portion of Plateau Road is marked as ‘transformed land’, whilst other transformed land is classified according to floral or veld type (24). Compare Wildeschutsbrand area and land east of Plateau Road (30).
 - b. The Perdekloof/Kilfinan/Wildeschutsbrand area is mapped as Sandplain Proteoid Fynbos although the majority of this area is transformed. Similar areas in the upper Klaasjagers river valley are marked as “transformed” (26).

Response by Setplan to 1.4

- a. *The map will be amended to show floral classification underlying transformed land.*
- b. *See response 1.4a above.*

- 1.5 Vegetation, not ‘floral’ types, is shown. Neither public, nor interested and affected parties nor managers “will appreciate this classification scheme of Cowling *et al* 1996” (12).
- 1.6 The map is incomplete and requires further input with regard to the southern Peninsula from Fish Hoek southwards (13).
- 1.7 Wetlands seem to be missing from Hout Bay/Orange Kloof area (20).
- 1.8 The area from Kalk Bay Harbour to Clovelly should perhaps be ‘high’ rather than unrated (26).
- 1.9 Descriptions of vegetation of Newlands Forest should be revisited in the light of recent work which emphasises its significance, especially the pockets of Afro-montane forest. [Details of the vegetation are given in the comment.] (28).

- 1.10 How was marine ecological sensitivity determined? What do the thin black lines off the coast mean? Need a category to deal with eg oyster catcher breeding areas; there's a hotspot north of Slangkop Lighthouse (30).

Response by Setplan to 1.5-1.10

1.5 Noted.

1.6 *The map merely reflects a 'snap shot' of data currently in the Park's GIS. On-going updating and refinement of data is necessary and to this end the Park has a research programme.*

1.7 *Yes: these are not shown on the map as they fall within the urban area of Hout Bay which is classified as 'transformed land', as per the floral classification used as the underlay to this map. However, wetlands information is available as a separate data set in the Park's GIS.*

1.8 *Only the area around Kalk Bay harbour is unrated on the map, at the recommendation of Dr Barry Clark, the CPNP Marine Co-ordinator.*

1.9 *Agreed. We will strive to incorporate the useful information supplied into the map.*

1.10 *Marine ecological significance is shown on the map, not sensitivity. The information presented was sourced from the CMC and discussed with Dr Clark. As part of the parallel process underway to incorporate the marine areas into the Park, Dr Clark will refine and update the information presented. This will then be incorporated into the CDF process.*

2. Visual Features Map

- 2.1 Suggest call map 'Landform features which determine visual sensitivity' (30).
- 2.2 Lack of geology in the description of visual features. The three geosites compiled under the auspices of the Geological Society of South Africa are missing and should be included [relevant three brochures on the Sea Point Contact, the Chapman's Peak Drive and Table Mountain were included in comment] (7).
- 2.3 With regard to slopes:
- Klaasjagers and Schusters valleys should remain intact from human interference, as should the "steep slopes" and "gentle slopes" (yellow and off-white on the map) and alongside the Ocean View valley between the Slangkop and Fish Hoek mountains (9).
 - Odd that some areas are coloured as "gentle slopes" when the contour lines, which give the best indication of the lay of the land, contradict that notion eg Newlands and Constantiaberg slopes (24).

- 2.4 With regard to ridges and ridgelines, it is confusing that, according to the key, some ridges have no ridgeline and some ridgelines are not accompanied by ridges (24).

Response by Setplan to 2.1 – 2.4

2.1 *Noted.*

2.2 *Geological considerations will be incorporated into the description of visual features.*

2.3a. *Noted, this is an aspect the CDF will address.*

b. *Map will be revised to address anomalies.*

2.4 *The term ridge line has been used to describe both the crest of ridges (where prominent) and edges of escarpments.*

- 2.5 Viewing sites and lookout points seem to be “under collected” (13):
- a. There is a view site on the top of Red Hill overlooking False Bay which is not indicated on the map (13) (24).
 - b. Only lookout points accessible by vehicles are indicated on the map. Lookout points in remote areas are the critical vantage points that must be considered as they often provide views of natural areas, not built up areas or the sea like the ones shown on this map (24).
 - c. The entire coastline from Simon’s Town boundary to Smitswinkel has numerous view sites across False Bay to the Hottentots Holland as far as Hangklip (13).
 - d. Every mountain peak from Rooikrantz, Platkop, Elsies Peak, Grootkop, Platberg, Klaasjagersberg, Simonsberg, the entire Swartkop range and so on to Cape Point, are fantastic view sites (13).
 - e. Not enough emphasis given to the sweep of mountain peaks forming the Twelve Apostle Range and the magnificent views from Camps Bay Drive and at various points along Victoria Drive, without development. Likewise, Chapman’s Peak from Hout Bay to the crest of the Drive (20).
- 2.6 Klein Slangkop Point is not a wetland (30).
- 2.7 Should include areas of tree planting as these are a major visual resource or asset for conservation (27).

Response by Setplan to 2.5-2.7

2.5a. *Noted*

b. *Lookout points presented on map are as currently recorded in the Park's GIS. We agree that information on lookout points in remote areas would be useful and suggest CPNP includes this aspect in their research programme.*

c. *Noted.*

d. *Agreed.*

e. *Noted.*

2.6 *This mistake on the map will be corrected.*

2.7 *Where deemed relevant, this aspect will be addressed in the revised Heritage Resources map.*

3. Cultural and Historical Features Map

Comment by Setplan

As explained in our overall response to comments on the Synthesis Mapping, at the start of Section C, the CPNP will prepare a revised heritage resources map to address the shortcomings of the current map. The revised map is to serve as the provisional baseline informant to the CDF. The map will be upgraded over time as part of the preparation of a Heritage Resources Management Plan for the CPNP.

3.1 The **CPNP must be seen within its cultural context:**

- a. An understanding of the tangible and intangible patterns left by humans over thousands of years must be developed (22).
- b. The CPNP should be seen to be preserving a representative, not Eurocentric history of the Peninsula: The history and heritage of the indigenous people of the Cape is contentious (18), has been "hideously stigmatized" (19).

Response by Setplan to 3.1

- a. *Agreed. See our Section A3 response and recommendations.*
- b. *We agree that cultural and heritage resource preservation should not have a Eurocentric bias.*

3.2 The **map is inadequate** in a number of key respects:

- a. “Few major decisions” about cultural aspects can be made without “a great deal more information and evaluation”. The lack of cultural heritage analysis is a key omission (27).
- b. Map is of little value, “missing the point” and indefensible (4); skimpy and sometimes confusing” (24).
- c. Cultural landscape needs to be addressed:
 - ❑ The whole Peninsula mountain chain is a cultural landscape and contains an infinite number of cultural landscapes within it; the notion of a cultural landscape needs to be used as an analytical tool at all scales (27).
 - ❑ Heritage comprises far more than isolated sites; now recognised that ‘sites’ comprise potentially large areas of landscape, even entire landscapes (4).
 - ❑ Cultural and historical features may not be point specific and cannot be divorced from their landscapes (27).
- d. Omission of a number of cultural historical features:
 - ❑ Cultural features appear to be “grossly under-represented”; needs further input for the southern Peninsula south of Fish Hoek. (13)
 - ❑ The cultural sites on this map are not comprehensive (30), and a process of identification must be carried out to address this gap in baseline information as a matter of priority. A “proper audit” of these resources should “be a prerequisite” for any CDF (17).
 - ❑ The point data are not comprehensive; seems that a number of sites have not been indicated, both within the boundaries of the Park and those bordering on, and at times within the urban fringe (18) (27).
- e. No reference to historical open spaces or archaeological sites (27).
- f. Indicates lack of heritage resource research undertaken to date (22).
- g. Conservation areas, especially those abutting the CPNP, need to be mapped (27).

Response by Setplan to 3.2

- a. *Agreed. See our Section A3 response and recommendations.*
- b. *We are under no illusions with respect to deficiencies in the Park's information base on cultural and heritage resources. These deficiencies were acknowledged upfront in the TCDF document. We purposefully prepared the map based on the "skimpy and sometimes confusing" information currently available in order to illustrate the discrepancies between the biophysical and the cultural/heritage information base on the Cape Peninsula. We expected, and welcome, comment that highlights this anomaly. We hope that the CDF process can make a small contribution to redressing this imbalance. However, we recognise that substantive research is required on this important and contentious subject. Such research won't be completed within the time allowed for preparing the CDF. If the map generates action in redressing decades long neglect of the cultural environment, we would argue that the map has been of immense value.*
- d. *We agree with all these points. See our response above and those made in Section A3.*
- e. *Agreed. This should form part of a research programme.*
- f. *Very much so.*
- g. *We agree, and are still awaiting this information which we requested from the City of Cape Town in May 2000.*

3.3 Some of the **categories and criteria used in mapping are not clear.**

- a. Not clear what criteria were used to determine historical and cultural importance; these should be explained (16).
- b. The division of sites into 'natural' and 'historic' – meaning built or structural - resources is not supported by current heritage legislation (27).
- c. The criterion 'natural features' is "weird" in terms of cultural/historical features, particularly as there is such a wealth of such features on the Peninsula (24); not clear what kind of 'natural feature' is referred to in the key (27).
- d. 'Paths and tracks' need to be described in more detail; are they railway or pedestrian routes, used by specific people, etc (27).
- e. What is a 'landmark'? What criteria are used? (27)

Response by Setplan to 3.3

- a. *The information currently available in the Park's GIS was used. We agree that criteria need to be established for assessing the relative importance of the various sites and landscapes of the Cape Peninsula.*
- b. *Agreed.*
- c. *We agree that the 'natural features' shown are subjective and should not form part of a map of cultural and historic features.*
- d. *Agree that existing information on "paths and tracks of historical significance" needs to be rationalised as part of an overall cultural and historical research programme.*
- e. *Using the Park's inventory of cultural and heritage sites, man-made structures (eg; Dias Cross and Maclears Beacon) were classified as 'landmarks'.*

3.4 Suggestions with regard to improving the information base and map:

- a. A comprehensive research programme should be commissioned as soon as possible on Heritage Resources. [Cape Institute of Architects offers to assist CPNP in such work] (22).
- b. Should begin with a series of maps indicating the "morphological development" and use of the CPNP; then identify historic patterns of use, finally develop a rigorous set of criteria to measure cultural sites against (27).
- c. Suggest consult with, and refer to, the following, amongst others:
 - ❑ Work done by Cathy Salter-Jansen, Jim Hallinan and one of his associates on the cultural history of the southern South Peninsula [The Simon's Town Museum offers assistance in future] (18) (24).
 - ❑ Work done on areas such as Van Riebeeck Park, which is indicative of the added value of such work which creates exciting development potential (22).
 - ❑ The 'history' accessed on the CPNP's "Profile" section on the internet is "scant and Eurocentric" in outlook. Suggest contact UCT's Archaeology and History Departments and the indigenous people's organisations in Cape Town for a more balanced history (18).
 - ❑ Several books in the UCT library – "Hottentotica Toponimica" in particular – that should be consulted. Mr R Martin at National Monuments Council (contact phone number provided) should be consulted (19).
 - ❑ The Cape Cultural Heritage Development Organisation (contact names and phone numbers provided) (19).

- ❑ The Muslim Museum in Simon's Town (24).
- ❑ The Naval Museum in Simon's Town (24).
- ❑ Environmental Manager, SPM, for additions (30).

Response by Setplan to 3.4

- a. *We endorse this proposal and welcome the offer of assistance. See our Section A3 response and recommendation.*
- b. *Suggestion noted.*
- c. *All suggestions noted.*

3.5 Specific omissions or inaccuracies:

- a. Mines, quarries and kilns:
 - ❑ No accompanying description of the old mines, quarries and kilns shown on the map (7).
 - ❑ A few old quarries are missing; eg Strand Street and Lakeside Quarries [details thereof given in comment] (7).
 - ❑ Include sandstone quarries at Glencairn, Clovelly (30).
- b. Remains of the historic World War II secret military radar stations operated by the Special Signals Services (SSS): Only 2 or 3 radar sites seem to have been marked. There were a total of 17 stations in the Western Cape and today there are remains of 5 important transmitter/receiver sites. [Details of these 5 sites given in comment. Also, booklets entitled "Outposts that scanned the sea and sky", "A concise story of the SSS and SA Radar in WW2" included.] (8).
- c. Graves at Signal Hill, Bakoven and Devil's Peak, as well as Just Nuisance's grave on Red Hill, should be included (12), Clan Monroe graves (30).
- d. Need to include other shipwreck sites or, alternatively, exclude all on the coast (12). SS Kakapo is much further down the beach (30).
- e. Vergenoegd, Muizenberg beach; Imhoff's Gift Farmstead. Historic milkwoods, Kommetjie perhaps too (30).
- f. More significance should be given to the drive between Muizenberg and Clovelly which comprises a "considerable number" of national monuments (20).
- g. Chapman's Peak is a landmark (30).
- h. Hard to believe that Cape Point is overlooked as a 'natural feature' in terms of historical significance (24).

- i. Historic hedges; only one is listed and many more are left out (27).

Response by Setplan to 3.5

- a. *Space does not permit additional descriptions to be shown at this scale of mapping. However, as noted at the start of Section C, GIS allows for 'clicking on' a feature shown on the map to reveal the description as recorded in the Park's GIS data base files. Information on omitted quarries will be included on the map.*
- b. *Information will be included on the map.*
- c. *Where appropriate, additional information will be included on the map.*
- d. *Information will be included on the map. The location of Kakapo is confirmed as correct.*
- e. *Where appropriate, additional information will be included on the map.*
- f. *Noted.*
- g. *Noted.*
- h. *Noted.*
- i. *Agreed, should be addressed in research programme.*

4. Current Land Uses and Activities Map

4.1 Activities:

- a. Should differentiate between different types of organised sport, as they have "vastly different" impacts (2).
- b. **Walking trails:** Footpaths and walking trails should be marked on the map (1) (16).
 - The appropriate management of these paths and trails in forest areas is critical (28).
- c. **Surfing:** Need to include the rapidly growing number of sites for surfing on the Peninsula. [Numerous examples given in comment]. (14) (16).
- d. **Recreational road biking and walking** constitute "significant general activities" which should be considered to be added; significant points of departure for walking, eg Constantia Nek, Lions Head parking lots, should be included (14).

- e. Access for **dog-walkers** needs to be covered, either as discussion point or on map (2).
- f. The few, but high impact, **annual 'special events'** warrant consideration: eg Argus Cycle Tour, Two Oceans Marathon, Kloof Nek skateboarding event and the concerts in Kirstenbosch gardens (14).
- g. Numerous 'officially open', 'currently used', 'grey', 'occasionally open' and 'under negotiation' areas for **mountain biking** within and around the CPNP should be shown. [Details given in comment] (11) (16)
- h. The 1996 Use Zone Map showed a mountain biking trail from Cape Point to Lion's Head. The CPNP should honour this 1996 trail which was developed with extensive participation of various shareholders (11).
- i. **Horse riding**: Mention should be made of horse riding in the Red Hill – Glencairn Pass area, along the Cape Point Reserve fence near the Ostrich Farm (26).
- j. **Abseiling** is currently operated off Table Mountain, near the cableway (15).
- k. **Scouting**: No indication of the Appleton Camp on Signal Hill currently being leased by the SA Scout Association (until 2013), or indication of any plans for its future use (21).

Response by Setplan to 4.1

- a. *More details on organised sport are not currently available in the Park's GIS. This aspect should be considered as part of a research programme.*
- b. *Agreed. This information is now available in the Park's data base and will be incorporated into the map.*
- c. *Where appropriate, additional information will be included on the map.*
- d. *Noted.*
- e. *Noted.*
- f. *Noted.*
- g. *Noted. However, at this stage only designated routes will be shown on the map.*
- h. *Noted. CPNP have stated their intention to investigate biking and hiking trails on the Peninsula.*
- i. *Where appropriate, additional information will be included on the map.*
- j. *Where appropriate, additional information will be included on the map.*

4.2 Land uses:

- a. The **categorisation** of areas into 'existing rural, residential, smallholding areas' (light pink) and no assigned use (white) is controversial. [Reasons given in comment.] It is essential that the approach to describing private properties in the CPNP is consistent and explicit; all private properties within the CPPNE have the same legal rights and a legal precedent could be set by distinguishing between these properties and conferring different rights (24):
- b. The **demarcation and definition** of 'existing rural, residential, smallholding areas' is questioned in the Witsands to Perdekloof area: a private nature reserve is excluded from this category and should be incorporated (23).
- c. **Unauthorised, illegal trading:** The 'rural, residential, smallholding areas' along Plateau Road and at Perdekloof picnic area, with designated 'business sites', are cause for concern (9). These 'business sites' either need to be removed from the map or need to be qualified as "illegal trading sites" or "unauthorised" under current zoning and land use regulations (23) (24) (30).
- d. Should differentiate between picnic areas and braai areas (2).
- e. Public toilets and parking at access points should be addressed (2).
- f. Misty Cliffs, as registered with the Surveyor General, including erf 75, now makes up a larger area than Scarborough (23).
- g. What has happened to the 'wilderness' and 'high priority conservation' areas? That is, the 'limited access/use' areas? (12)
- h. With regard to visitor sites:
 - Smitswinkel should be included inside the Cape of Good Hope boundary (12).
 - Halfway up Red Hill road at the CPPNE boundary on the Winford/Buffelsfontein side, a 'visitor site' is indicated. There is no such site here (24).
- i. The motivation or rationale behind the rating of visitor sites is not explained. It is felt that Olifantsbos and Buffels Bay should be rated 'high' (12).
- j. Hout Bay has a "vast number" of B&B establishments which aren't shown (20).
- k. Why is Newlands Forest not included? (20)
- l. The Urban Edge Line should be indicated on the map. Although it does not have the "legal teeth" that the CPPNE does, it has achieved wide agreement and buy-in and indicates very clearly the extent to which urban development subdivision rights exist. In nearly all instances it is the more conservative of the two lines and provides a clear point of departure in considering the CDF (14).

Response by Setplan to 4.2

- a. *Noted – inaccuracies will be corrected.*
- b. *Noted – inaccuracies will be corrected.*
- c. *We agree and will change the description of these activities.*
- d. *Noted.*
- e. *Agree that CDF must address this aspect.*
- f. *CPNP's file of built up areas will be corrected.*
- g. *The CDF will be revising the 1996 Land Use zoning map.*
- h. *Private land cannot be designated as part of the CPNP. Inaccuracy in 'visitor site' noted – will be removed.*
- i. *Following discussion with CPNP management, beaches were rated in terms of their intensity of use. The parallel process underway, addressing the incorporation of the marine areas into the Park, will allow for the refinement of the information presented.*
- j. *Agreed, this will be corrected on the map.*
- k. *Newlands Forest is not marked as a commercial plantation; it is managed for recreation.*
- l. *Noted – the urban edge will be plotted.*

5. Hazardous and Unstable Areas Map

- 5.1 The geology is, in places, incorrect and will have to be rewritten (7).
- 5.2 Quarries:
 - a. Several quarries are missing. [A list of 25 quarries in the Cape Peninsula is included with comment; reference is made to a study by Dr Doug Cole entitled "Geological Commodities within and adjacent to the proposed Cape Peninsula National Park", dated March 1997, which was prepared for the SANP, which may be useful for Maps 3-5] (7).
 - b. Unsure of the abandoned quarry in the Rooikrans area (12).
- 5.3 Should be indicated that some areas along Chapman's Peak Drive are unstable/dangerous (16).

- 5.4 The Misty Cliffs and Kommetjie Pass areas should be indicated in the 'Falling rocks in cliffed sandstone areas' category (26).
- 5.5 The area on Red Hill which burned in the January 2000 fire is incorrectly shown on the map. Winford was singed on its southern and eastern boundaries, an area of about 70ha to the north west of Winford was not burned and most of CF999 did not burn (24).

Response by Setplan to 5.1-5.5

- 5.1. *Noted. The geology shown is as per the official 1:50 000 sheets, except for the granite and sand areas which were chosen to indicate potentially unstable areas.*
- 5.2 *Noted. Quarries will be shown.*
- 5.3 *Agreed.*
- 5.4 *Agreed.*
- 5.5 *Incorrect fire file inadvertently used in the map.*

6. Vehicular Access Routes and Traffic Map

- 6.1 Names of major roads should be indicated on the map for ease of reference (16).
- 6.2 Access routes for emergency vehicles should be identified or proposed in the CDF (16).
- 6.3 Access route to Sandy Bay through the Sunset Rocks residential area is totally inadequate; the Park authorities must open the access via Kronenzicht Estate on the Nek - this was a major condition of the development and property deal with the WWF (20).
- 6.4 Congestion areas:
- Unauthorised trading should not be used as motivation to build better roads in the CPNP (9).
 - Congestion occurs outside the main entrance to Cape Point Nature Reserve, not near the illegal trading points in the Plateau Road/Perdekloof area (23).
 - No parking congestion near Kogelfontein/Perdekloof since SPM brought out noise regulations in 1998, which stopped the rock concerts/raves on Kilfinan and Wildeschutsbrand, which was the cause of congestion (24). 'Parking congestion' at Perdekloof should be removed (30).

- d. Parking congestion at Kirstenbosch concerts should be considered (14).
- e. Areas where informal stopping at viewpoints causes congestion should be noted (16).
- f. Congestion on Constantia Nek Road should be shown on the map (16).
- g. The northern base of Ou Kaapse Weg can get congested at rush hour on weekdays (26).
- h. Vehicle theft:
 - At Signal Hill (16), Lion's Head (16), Tafelberg Road (16), Constantia Nek (16) (20), Red Hill (16), points on Chapman's Peak Drive, especially at the East Fort parking area and the start of the path to Sandy Bay from Llandudno (20).

Response by Setplan to 6.1–6.4

6.1 *Full description of roads available using 'click-on' feature on GIS. Whilst too many names on the map could make it cluttered, we agree that a few key names should provide a reference base.*

6.2 *Noted – this will be addressed by appropriate agencies separate to CDF process.*

6.3 *Noted.*

6.4a. *Agreed.*

b. Noted. Map will be amended accordingly.

c. Noted. Map will be amended.

d. Noted. Map will be amended.

e. Agreed.

f. Noted.

g. Noted.

h. Noted.

ADDENDUM 1

LIST OF INTERESTED AND AFFECTED PARTIES WHO SUBMITTED WRITTEN COMMENT ON THE TOWARDS A CONSERVATION DEVELOPMENT FRAMEWORK REPORT AND SYNTHESIS MAPPING

**List of Interested and Affected Parties who Submitted Written Comment on the
 Towards a Conservation Development Framework Report and Synthesis Mapping**

Ref No	Party	Organisation/s Represented	Enclosures
1.	Chris Goldschmidt	<input type="checkbox"/> Western Province Athletics (Cross Country and Road Running) <input type="checkbox"/> Peninsula Orienteering Club	
2.	Lawless Family		
3.	Mrs JA Hart and Dr PMG Hart		
4.	Prof Fabio Todeschini		
5.	Dave Cowley	Hout Bay & Llandudno Heritage Trust	
6.	Ruth Kansky	Cape Peninsula Baboon Project	Excerpts of "Baboon Management Strategy for the Cape Peninsula" by R Kansky and D Gaynor, including "Chapter 7: Baboon hotspots and considerations for further development", and a map showing numbered "problem spots" for human development"
7.	Dr Doug Cole	Council for Geoscience	Three brochures on: the Sea Point Contact, the Chapman's Peak Drive, Table Mountain
8.	Geoffrey Mangin	SSS Radar Group	Booklets: "Outposts that scanned the sea and sky" and "A concise story of the SSS and SA Radar in WW2"
9.	PAR Erasmus	Kommetjie Residents' and Ratepayers' Association	
10.	Kate Hopkins and Di Wilson		
11.	Robert Breyer	Pedal Power Association	"Proposal for Mountain Cycling in the Silvermine North Section of the CPNP" by Robert Breyer, PPA, dated 27 April 2000.
12.	Liz Ashton	Friends of Cape of Good Hope	
13.	Peter Salter	Simon's Town Flora Conservation Group	
14.	Kier Hennessy	Spatial Planning Department, Cape Metropolitan Council	
15.	Trevor Ball	Abseil Africa	

**List of Interested and Affected Parties who Submitted Written Comment on the
 Towards a Conservation Development Framework Report and Synthesis Mapping
 (continued)**

Ref No	Party	Organisation/s Represented	Enclosures
16.	Lorraine Smit	Environmental Management Department, Cape Metropolitan Council ("not the formal comment of the CMC")	
17.	DG Hart	SA Heritage Resources Agency	
18.	Cathy Salter-Jansen	Simon's Town Museum	
19.	R Ryklief	Cape Cultural Heritage Development Organisation	
20.	Neil van der Spuy	Llandudno Civic Association	
21.	Luke van der Laan	SA Scout Association – Cape Western Area Scout HQ	
22.	Henry Aikman	Cape Institute of Architects, Planning and the Environment and the Heritage subcommittees	
23.	Ivan and Danielle Harris	Baskloof Private Fynbos Nature Reserve	
24.	Alida Croudace	The Red Hill Conservation Group	
25.	Major M Laubscher	SANDF (RFIM Western Cape)	
26.	Nick Helme	Friends of Scarborough Conservation Group	
27.	Clive James	Environmental Management Branch, City of Cape Town	Fax of suggested revision to Figure 1, Section 3, Towards a Conservation Development Framework Report
28.	Patricia Littlewort	Afro-montane Information Forum	"Terminology for broad forest communities at Newlands Forest area", excerpts from McDowell, 1994, Newlands Long Term Plan, Dr Coert Gelenhuys' report
29.	Tim Turner	Tim Turner & Associates, Planning and Development Consultants	Copy of Surveyor-General's diagram and a locality plan showing Erf 3410, Simon's Town
30.	Mark Callaghan	South Peninsula Municipality	